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October 16, 2026

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

Project Name: 915 9th Street Residential Project
Project Record Numbers: PDS2025-TM-5665, PDS2025-DB-25-005,
PDS2026-STP-26-006
Environmental Log Number: PDS2025-ER-25-09-003
APN(s): 284-202-21-00; 284-203-08-00; 284-205-01-00;
284-244-01-00

Lead Agency Name and Address:
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Planning and Development Services
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Project Location:
The proposed 915 9th Street Residential Project (project) is located within an unincorporated area of the Ramona Community Plan area in eastern San Diego County. The approximately 19.65-acre project site is located at 915 9th Street Ramona, California 92065.

Project Applicant Name and Address:
Warmington Residential
3090 Pullman Street
Costa Mesa, CA 92626

General Plan

Community Plan:	Ramona Community Plan
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-2 and VR-7.3)
Density:	VR-2 and VR-7.3
Floor Area Ratio (FAR):	N/A

Zoning

Use Regulation:	Rural Residential (RR) and Variable Family Residential (RV)
Minimum Lot Size:	RR-.5 Acre and RV – 6000 square feet
Special Area Regulation:	Community Design Review Area, Airport Land Use Compatibility Plan Area

Description of Project:

The 915 9th Street Project (project) is located at 915 9th Street in the unincorporated community of Ramona, San Diego County, California. The site encompasses approximately 19.65 acres across four parcels and is mostly vacant, aside from an existing single-family residence and an aging barn located in the northeastern portion of the property. The existing single-family residence would remain while the existing barn would be demolished. The surrounding area is primarily developed with residential uses and includes a nearby school. The project consists of a Tentative Map, Density Bonus, Roadway Vacation, and a Site Plan application to subdivide approximately 19.65 acres across four parcels into 88 single-family residential lots and 12 lettered lots (for Private Streets, Open Space, Water Quality, Drainage and Utility Purposes). Development under the Tentative Map is proposed on APNs 284-202-21, 284-203-08, and 284-244-01. APN 284-205-01 is excluded from the Tentative Map and would not be physically subdivided or developed; however, it would remain as a remainder parcel and its allowable residential density would be transferred to the project.

The project proposes the development of 88 single-family homes across two land use designations. Approximately 2.64 acres of the site are designated Village Residential 7.3 (VR-7.3), allowing for 7.3 dwelling units per acre. Within this area, 16 units are proposed at a density of 6.06 dwelling units per acre. The remaining 17.02 acres are designated Village Residential 2 (VR-2), which allows for two dwelling units per acre. In this area, 72 units are proposed at a density of 4.23 dwelling units per acre, achieved through implementation of State Density Bonus Law, AB 1287, and the proposed density transfer from APN 284-205-01. This includes a commitment to provide eight units for very-low-income residents (15 percent) and three units for moderate-income residents (five percent), which qualifies the project for both an initial and additional density bonus. The resulting unit count in the VR-2 area reflects a base density of 35 units, plus 26 bonus units for very-low-income housing and 11 bonus units for moderate-income housing.

To accommodate the proposed lot layout, unit count, and density, the project proposes using waivers and incentives allowed by State Density Bonus Law. Waivers are requested for setback, lot depth, lot frontage, and cul-de-sac lot frontage in order to accommodate the project design

and proposed housing density. These waivers are applied across multiple lots and are intended to provide flexibility in lot configuration, building placement, and internal circulation while meeting applicable zoning and design standards. The project would also request a waiver to elect to pay in-lieu fee for parks, which is fully in compliance with the Park Land Dedication Ordinance and would not request a deviation from this fee. In order for the project to be constructed at the proposed densities, the project proposes the use of a waiver to remove the requirement to dedicate, construct, and maintain a portion of the Community Trails Master Plan (CTMP) Town Loop Connector Trail No. 113 that crosses the project site. While the project is waiving the trail itself, the project still delivers the access it was intended to provide. Continuous 5-foot sidewalks run through the entire community, connecting 9th Street to San Vicente Road through an ungated layout open to the public. This meets the connectivity purpose behind Trail No. 113 without the separate corridor. The project utilizes a density bonus incentive to allow existing and proposed utility infrastructure, including power poles, to remain above ground rather than requiring undergrounding. This incentive is requested to support project feasibility and site design while maintaining consistency with applicable utility provider requirements and County standards.

The single-family homes would be built using three different floor plans, ranging from 2,739 gross square feet to 3,436 gross square feet, four- and five-bedroom layouts, all two-stories in height. The development would be designed using three different styles – Spanish, Craftsman, and Monterey – each with three different but coordinating color schemes. Architectural elements would include stucco, decorative shutters, tile roofs, and horizontal hard plank siding.

The project is proposing three parks within the project site that would be privately maintained. These parks are not County recreational facilities. Park A is located on the northwest section of Neighborhood A and would include a picnic table and turf area. Park B is located in the northwest corner of Neighborhood B bordering first street. Park B would include a picnic area, bench seating, and sidewalk. Park C is the largest and is located off the new internal street in Neighborhood B. Park C would include barbecue, picnic table, sidewalk, community garden, turf area, planting area, play surface and a playground.

Landscaping for the project would consist of California-friendly, low and medium water use plant materials. Street trees are proposed to create a border around the development. Brisbane box trees, southern magnolia, and Muskogee crape myrtles would be used to front each home.

The project includes construction of internal private streets, sidewalks, utilities, and stormwater infrastructure. Access to the project would be provided from 9th Street via a system of private internal streets. The project includes the Roadway Vacation of a portion of 10th Street traversing the site. Following the roadway vacation, access at 10th Street would be restricted through the installation of a gated Emergency Vehicle Access (EVA) connection limited to emergency access only. Off-site improvements would include half-width roadway improvements along 9th Street fronting the project site and frontage improvements along San Vicente Road consistent with County standards.

Relative to public services and utilities, the project is located within San Diego County Fire Protection District. Water and sewer would be provided by Ramona Municipal Water District. In accordance with District conditions, the owner/developer is required to enter into an agreement stating that the owner/developer pay all actual costs of the facilities required by the project for water and sewer and make a deposit with the District to cover all costs for planning and system evaluation. School service for the area is provided by the Ramona Unified School District. The project would require connections to nearby SDG&E electricity and gas. The project would satisfy the requirements of the County's Park Lands Dedication Ordinance through payment of in-lieu fees.

The project site has a land use designation of Village Residential in the Ramona Community Plan. The Village Residential land use designation provides for residential development within designated Village areas, areas where a higher intensity and a wide range of land uses are anticipated by the General Plan. Additionally, the project site is located within the County's Draft North County Multiple Species Conservation Program in land designated as outside the Pre-Approved Mitigation Area.

The project is designed to complement the existing residential character of the community while contributing to local housing goals through the inclusion of affordable units and thoughtful site planning consistent with County zoning regulations and State housing law. Preliminary grading associated with the project includes approximately 176,831 cubic yards of cut, 60,900 cubic yards of fill, and 115,931 cubic yards of export.

Discretionary Actions:

Required discretionary approvals for the project include a Tentative Map, Density Bonus, Roadway Vacation, and Site Plan.

Overview of Section 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; or
- 2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR.

Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed 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 unincorporated San Diego County that meets community desires and balances environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all 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 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 area 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 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 General 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 would reduce or avoid environmental impacts.

Summary of Findings

The project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project and identified applicable mitigation measures necessary to reduce project specific impacts. The project implements mitigation measures identified in the GPU EIR that apply to the proposed project. (See 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 and Appendix C for a list of *GPU Mitigation Measures Applicable to the Project*.)

A comprehensive environmental evaluation has been completed for the project as documented in the attached Section 15183 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). All required findings can be made.

In accordance with CEQA Guidelines Section 15183, the project qualifies for an exemption because the following finding 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 project would develop 19.65 acres with 88 single-family homes across two zoning designations. Approximately 2.64 acres of the site are designated VR-7.3, allowing for 7.3 dwelling units per acre. Within this area, 16 units are proposed at a density of 6.06 dwelling units per acre. The remaining 17.02 acres are zoned VR-2, which allows for two dwelling units per acre or 35 units. In this area, 72 units are proposed at a density of 4.23 dwelling units per acre, achieved through the use of the State Density Bonus Law and AB 1287 consistent with the County's Zoning Ordinance and certified by the GPU EIR. This includes a commitment to provide eight units (15 percent of the project's development intensity) for very low-income families and three units (5 percent) of the project's development intensity for moderate income families, which qualifies the project for both an initial and additional density bonus. The resulting unit count in the VR-2 zone reflects a base density of 35 units, plus 26 bonus units for very low-income housing and 11 bonus units for moderate-income housing. Therefore, because the project is eligible for a density bonus, which is consistent with the County's Zoning Ordinance, the project is consistent with the development density established by existing zoning, community plan or General Plan policies.

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 that are peculiar to the project or its site. The project site is located in an area developed primarily with residential uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

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. However, applicable mitigation measures specified within the GPU EIR have been made requirements of the project.

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

The project includes off-site roadway and frontage improvements. Improvements would be consistent with the County standards and would not result in potentially significant impacts. With regard to cumulative impacts, the project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the project, and as explained further in the Section 15183 Checklist below., No potentially significant off-site or cumulative impacts have been identified that were not previously evaluated.

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

As explained in the 15183 Checklist, below, no new information has been identified that would result in a determination of more severe impacts than what had been anticipated by the GPU EIR.

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

As explained in the 15183 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

Date

Printed Name

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” indicated 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” indicated 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” indicated 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 mitigated 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?	☐	☐	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐

Discussion

- 1(a) The GPU EIR concluded this impact to be less than significant with mitigation. As described in the GPU EIR (County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR that have aesthetic value. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. If future development or infrastructure is developed that is inconsistent with these vistas, that future development could detract from the scenic value and cause a significant impact. Therefore, the GPU was found to have the potential to impact scenic vistas in the County requiring mitigation measures.

Mitigation measures Aes-1.1 through Aes-1.11 were included to reduce potentially significant impacts to below a level of significance. The mitigation includes a measure to ensure lands contributing to scenic vistas will not be developed with high density or intensity uses, protection of sensitive biological habitats and species, updates to Community Plans to minimize potential visual impacts, improved design review process for future development, preparation and implementation of a Conservation Subdivision Program, community review and specific compatibility finding for development projects that may have a significant adverse effect on scenic resources, programs and regulations that preserve agricultural lands, improved regulations that protect the County's unique topography, the identification of scenic resources in the County through a cooperative effort among stakeholders, requirement of the County to participate in local and regional planning efforts with other agencies/entities, and continuation of on-going efforts to require undergrounding of utilities for projects and convert existing overhead utilities.

Project

The project site is located in the Ramona Community Planning Area (CPA). The Ramona community is known for its rural lifestyle. The community plan intends to continue to balance the need for growth with the desire to maintain the existing balance of land uses. The environmental setting of Ramona contains scenic mountain views, expansive valleys, a variety of oak groves, scenic geology unique to the region. The project site is not located within an RCA. The nearest RCA is Hatfield Creek located approximately three miles northeast of the project site and is not visible from the project site.

In addition, the project site is not located near any scenic resources. The project is proposing a single-family residential community consisting of 88 homes constructed as two-stories and up to 28 feet in height. Surrounding land uses are primarily single-family residential, comprised of mostly one-story with some two-story residences, and a school. Therefore, the proposed residential land uses on the project site would not have a substantial effect on a scenic vista.

As previously discussed, the GPU EIR determined impacts on scenic vistas 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that future development consistent with the GPU would have the potential to result in the removal or destruction of scenic neighborhood or community resources, such as historic resources, trees, or rock outcroppings. Future development or redevelopment of GPU land uses along the two designated State Scenic Highways (SR-78 and SR-79) located in the County would have the potential to detract from the visual quality of the scenic highway. Therefore, the GPU EIR found a potential significant impact to State Scenic Highways would occur. Impacts would be mitigated to below a level of significant with implementation of mitigation measures Aes-1.1 through Aes-1.11, described under issue 1(a), above.

Project

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans California Scenic Highway Program). Generally, the area defined within a state scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. The project site is not located on or near a State Scenic Highway. The nearest officially designated State Scenic Highway is a portion of SR-78 near Anzo Borrego Desert State Park that is approximately

21 miles east of the project site. There are three County Designated Scenic Highways near the project vicinity, Highland Valley Road, San Vicente to Ramon Oaks Road, and Portions of State Route 78. The project site's northwest corner borders San Vicente Road. The project would not substantially affect the County Scenic Highway. In addition, the project would construct a single-family residential community that would be consistent with and blend in with the existing single-family homes near the project site along San Vicente Road. Project landscaping would focus on native drought-tolerant plantings that would create a uniform theme across the project site. The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.

As previously discussed, the GPU EIR determined impacts on scenic resources 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 within the GPU EIR. The project would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that implementation of the GPU includes land use designations resulting in increased development densities in some areas that would have the potential to degrade the existing visual character and quality of communities in unincorporated San Diego County. The GPU included policies in the Land Use, Mobility, and Housing Elements that would reduce the potential for visual character and quality impacts. However, mitigation measures were found to still be necessary. Mitigation measures Aes-1-1 through Aes-1.11 and Aes-3.1 and Aes-3.2 that implements existing standard, as well as the preparation of new, community right-of-way development standards that supplement County Road standards were found to only partially mitigate the significant impact.

The GPU EIR considered other mitigation to reduce impacts to visual character and quality, such as revising goals and policies to be prepared and incorporated into community plans that would severely limit the potential for development growth; expanding the Zoning Ordinance to specifically dictate the exact development type and design allowed in various areas; and approving only development that is comparable in size, scope, and use as existing development in order to avoid impacts to visual character and quality. However, these measures were found to be infeasible as they would conflict with the goals of the Housing Element to provide sufficient housing stocks and accommodate a reasonable amount of growth, would include detailed land development master plans for the entire County, and would result in restrictions on future development in areas identified for increased growth in the GPU and/or areas where existing land uses are not the same as the land uses proposed by the GPU. Because the measures listed above were found to be infeasible, the GPU EIR concluded that impacts to visual character and quality would remain significant and unavoidable.

Project

The project site is currently mostly vacant aside from an existing single-family residence and aging barn located in the northeastern portion of the property. The undeveloped portion of the property consists of disturbed land mostly grass and dirt with a few trees and wire fencing. The uses surrounding the project site include residential uses and a nearby school.

The project would construct buildings designed to blend aesthetically with the character of the surrounding community. The development includes three distinct themes, Spanish, Craftsman, and Monterey. The aesthetic elements of project buildings would include stucco light sand finish body, stucco window trim, white vinyl windows, decorative shutters, and tile roofs. Hardscape areas of the project would include asphalt driveways, concrete patios and walkways. The architectural design and style of the project are consistent with the rural character of the project site and surrounding area.

The project would not detract from or negatively contrast with the existing visual character and/or quality of the surrounding area. The project is consistent with the land use designations of the General Plan and is in conformance with the Ramona Community Plan. The location, size, and design of the proposed uses would be compatible with the uses in the immediate area. The project is similar to surrounding land use types.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The GPU would allow for additional growth in the County that would contribute new light sources with the potential to impact the County's dark skies. Policies in the GPU and mitigation measures Aes-4.1 through Aes-4.3 would be implemented to reduce impacts. Mitigation measure Aes-4.1 requires coordination with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls to reduce impacts to dark skies. Mitigation measure Aes-4.2 would maintain light and glare regulations found in the Light Pollution Code and Zoning Ordinances that minimize impact to adjacent properties, sensitive areas, community character, observatories, and dark skies. Mitigation measure Aes-4.3 requires participation in regional planning and planning by agencies within or adjacent to the County to the extent practicable. While implementation of these mitigation measures would reduce the impact associated with light or glare, the GPU EIR determined that impacts would not be mitigated to below a level of significance. Other mitigation measures were identified that would minimize the potentially significant impacts; however, the County determined that their implementation would be infeasible.

due to cost and that they would conflict with the goals of the Housing Element to provide sufficient housing stock. Therefore, impacts would remain significant and unavoidable.

Project

The project site is currently vacant except for a single-family residence and barn. Lighting on-site is minimal and includes streetlights along 9th Street. The project would add streetlights through the development on the newly created internal streets and lighting lining the sidewalk around Park C, as well as porch lights on the front of each single-family residence. Landscaping and architectural features associated with the proposed project may be illuminated.

The project is located within Zone B identified by the San Diego County Light Pollution Code. The project would not adversely affect nighttime views or astronomical observations, because the project is not located within the vicinity of either Palomar or Mount Laguna observatories. The project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the County Light Pollution Code (Sections 51.201–51.209) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to the issuance of a Building Permit. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources of light pollution on nighttime views. Thus, 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 previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that 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. Agricultural 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?	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	☐	☐	☐
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?	☐	☐	☐
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversions of Important Farmland or other agricultural resources, to non-agricultural use?	☐	☐	☐

Discussion

The following technical study was prepared for the project:

Agricultural Resources Report for the Ramona 9th Street Project, prepared by RECON Environmental, Inc., dated June 30, 2026.

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that the GPU would result in the direct conversion of 55,963 acres of agricultural resources to non-agricultural land uses. The GPU would result in potentially significant impacts to agricultural resources and mitigation measures are necessary. The GPU EIR identified mitigation measures Agr-1.1 through Agr-1.5 that reduce impacts associated with the direct conversion of agricultural resources but not to below a significant level.

Project

The site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency. The project site has been mapped by the

FMMP as “other land” and “Urban Built-up Land,” which are not considered significant agricultural lands in the County of San Diego. Furthermore, the project site is underlain by Placentia sandy loam and Fallbrook sandy loam. These soil types are listed as soil candidates for the FMMP Prime or Statewide Importance Farmland Categories.

The *Agricultural Resources Report* conducted a Local Agricultural Resource Assessment Model (LARA) that is approved by the County to determine the importance of agricultural resources in unincorporated areas of San Diego County. The LARA Model considers three required factors (water, climate, soil quality) and three complementary factors (surrounding land uses, land use consistency, and slope) in determining the importance of agricultural resources.

Based on the results of the LARA Model, the site is not considered an important agricultural resource. The project site received a high rating for the Climate factor and a moderate rating for the Water and Soil Quality factors. Since all three Required Factors were rated high or moderate, the Complementary Factors were also analyzed pursuant to the LARA Model requirements. The project site received a low rating for the Surrounding Land Use and Land Use Consistency factors, and a high rating for the Slope factor. Therefore, the results of the LARA Model show that the project does not qualify as an important agricultural resource.

Although the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, the LARA Model completed for the project determined that the project site does not qualify as an important agricultural resource. Furthermore, review of records during completion of the Phase I Environmental Site Assessment prepared for the project (Stantec, October 9, 2024), including aerial photographs, determined there is no historical evidence that the project site was ever used for agricultural production. Therefore, the project would not Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance, or other agricultural resources, to a non-agricultural use. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. The project would have a less-than-significant direct and indirect impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that implementation of the GPU would remove non-contracted lands from County adopted Agricultural Reserves and remove the “A” designator from those lands. By removing lands from a preserve boundary of a contract area, new incompatible land uses would be developed adjacent to existing agricultural resources. Therefore, a potential

land use conflict would occur and result in a potentially significant impact to Williamson Contract Lands. The GPU EIR identified mitigation measure Agr-2.1 to reduce impacts associated with conflicts with Williamson Act Contract Lands to below a level of significant. Mitigation measure Agr-2.1 states that an analysis shall be conducted to prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an “A” designator from a certain property, to ensure that the action removing the designation would not result in any significant direct or indirect adverse impacts.

Project

The project site is zoned Village Residential (VR-2 and VR-7.3). As mentioned above in Section 2(a), the project site would not be considered an agricultural resource. In addition, the project site is not within a Williamson Act Contract. There are no properties protected by a Williamson Act Contract or a County Agricultural Preserve surrounding the project footprints. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts on agricultural resources to be less than significant with mitigation. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified within the GPU EIR.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR, because Appendix G of the State CEQA Guidelines was amended to include significance criteria for Forestry Resources after the release of the Notice of Preparation for the GPU EIR.

Project

The project site is currently vacant except for an existing single-family residence and aging barn located in the northeastern portion of the property. The majority of the project site has been cleared. The project site does not contain any forest lands as defined in Public Resources Code Section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would not have an impact to forest resources for the reasons detailed above, the project would not create new impacts or increase impacts. Additionally, there is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

Project

As indicated in response 2(c), the project site is not located near any forest lands. The project site is currently vacant except for a single-family residence, aging barn and agricultural land. The uses surrounding the project site include residential uses and a retirement community consisting of manufactured homes. The project would not result in the 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.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would not have an impact to forest resources for the reasons detailed above, the project would not create new impacts or increase impacts. Additionally, there is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that the GPU would designate land uses that would allow additional growth and development to occur in the County that would have the potential to indirectly convert agricultural resources to non-agricultural use. The GPU EIR identified mitigation measures Agr-1.1 through Agr-1-5 to reduce impacts to the indirect conversion of farmland, although not to below a significant level. The GPU EIR considered a mitigation measure that would reduce impacts to below a level of significance. This measure stated that, within a half mile of any agricultural resource, approved development must be compatible in size and scope with the existing agricultural resource. However, the mitigation measure was found to be infeasible because it would restrict future development in areas identified for increased growth in the GPU. The GPU EIR concluded that impacts would remain significant and unavoidable.

Project

The project site is zoned Village Residential (VR-2 and VR-7.3). Per the *Agricultural Resources Report* prepared for the project, historically, the project site and adjacent area were not used for agriculture production. As discussed above under 2(a), while the project would result in the conversion of agricultural resource that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, the LARA model completed for the project determined that the project site does not qualify as an important agricultural resource. The project would not impact an important agricultural resource and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The project would have less-than-significant impacts to agricultural resources. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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
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)?	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐

Discussion

The following technical study was prepared for the project:

Air Quality Assessment, prepared by Ldn Consulting, Inc., dated July 7, 2026.

- 3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a nonattainment area for the Federal standards for ozone (O₃), as well as the state standards for O₃; particulate matter less than or equal to ten microns (PM₁₀); and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The San Diego Regional Air Quality Strategy (RAQS) and the region's portion of the State Implementation Plan (SIP) are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls.

The GPU EIR found that, while the GPU would allow development of residential, commercial, industrial, and other land uses in unincorporated County, future development would be required to comply with the strategies and measures adopted as part of the RAQS and SIP, as well as requirements of the County and/or Air Pollution Control District (APCD) to reduce emissions or particulate matter. With implementation of the requirement for consistency with emission control strategies in the RAQS and SIP, the GPU was found to not conflict with or obstruct implementation of the San Diego RAQS and/or applicable portions of the SIP. Impacts were found to be less than significant associated with conflicts to applicable air quality plans.

Project

Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP. Projects that propose development that is greater than that anticipated by the local general plans and SANDAG may be in conflict with the RAQS and SIP, and further analysis is required.

The project is proposing development of 88 single-family residences in two neighborhoods. This includes a commitment to provide eight units (15 percent of the project's development intensity) for very low-income families and three units (five percent) of the project's development intensity for moderate income families, which qualifies the project for both an initial and additional density bonus consistent with the County General Plan and certified by the GPU EIR. Therefore, because the project is eligible for a density bonus, which is assumed in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQs or SIP.

The project would include construction activities and operation of a single-family residential development. Grading operations associated with the construction of the

project would be subject to the Grading Ordinance, which requires the implementation of dust control measures and San Diego County Air Pollution Control District (SDAPCD) Rule 55.

As previously discussed, the GPU EIR determined impacts on air quality plans 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 3(b) The GPU EIR concluded this impact to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas and electricity), transportation (on-road mobile sources), and from short-term construction activities. The County has established Guidelines for Determining Significance for Air Quality (Air Quality Guidelines), which incorporate the SDAPCD-established air quality impact analysis Screening Levels Thresholds (SLTs) for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3.

Future development under the GPU would be required to comply with CARB motor vehicle standards, APCD regulations from stationary sources and architectural coatings, Title 24 energy efficiency standards, and the GPU goals and policies. However, even with implementation of these policies, the GPU EIR found that criteria pollutants associated with future development consistent with the GPU would exceed the SLTs for PM₁₀, PM_{2.5}, NO_x, and VOCs. Mitigation measures Air-2.1 through Air-2.13 were identified to reduce impacts, although not to a level below significance. Additional mitigation measures were identified that would reduce impacts to below a level of significance; however, the County determined that their implementation would be infeasible. These mitigation measures were found infeasible as they would limit which construction contractors would be allowed to work within the County, restrict future development in areas identified for increased growth, require the County to monitor and enforce the use of architectural coatings at all construction projects which it does not have the funding or staff available, increase infrastructure costs, severely limit development projects and conflict with the GPU's objectives. Impacts would remain significant and unavoidable.

Project

In accordance with GPU EIR mitigation measure Air-2-6, an Air Quality Assessment was prepared for the project. A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County's SLTs. Project construction would generate temporary air pollution emissions. Construction would generally consist of site preparation, grading, construction of the buildings and related improvements, paving and the application of architectural coating (painting). Air quality impacts related to construction and daily operations were calculated using California Emissions Estimator Model (CalEEMod) Version 2022.1.1.41. The current web-based CalEEMod platform is

maintained by ICF in collaboration with the Sacramento Metropolitan Air Quality Management District (SMAQMD), while earlier program versions were developed by the South Coast Air Quality Management District (SCAQMD). Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the project would include the following project design features, consistent with local, regional, and state regulations as well as GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

- Application of water three times daily during grading on active grading sites.
- Application of water three times daily to unpaved roads.
- Reduced speeds to 15 miles per hour (mph) on unpaved roads.
- Use of architectural coatings that are consistent with SDAPCD Rule 67.0.1, with a VOC content of 100 g/l or less for non-flat coatings and 50 g/l or less for flat coatings.
- Use of U.S. Environmental Protection Agency (USEPA) certified Tier 3 and Tier 4 engines with diesel particulate filters (DPF) during all grading and site preparation activities.

With the application of the measures listed above, project construction emissions associated with the proposed project are not anticipated to exceed the County's construction SLTs, as shown in Table 1, *Expected Maximum Daily Emissions* the project would not exceed the County's SLTs. Air quality impacts from project-related construction activities would be less than significant.

Table 1, Expected Maximum Daily Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀ (Total)	PM _{2.5} (Total)
2027	1.38	41.6	50.59	0.26	21.12	9.16
2028	36.8	2.63	13.19	0.02	0.36	0.11
Screening Level Threshold (lb/day)	75	250	550	250	100	55
% lower than Standard	50.87%	83.36%	90.80%	99.90%	78.88%	83.35%
Exceeds Threshold?	No	No	No	No	No	No

Operational emissions include emissions from landscaping and architectural coatings as part of regular maintenance, consumer products, and traffic generation. The expected daily project pollutant generation is shown below for the summer and winter scenarios in Table 2, *Expected Summer Daily Pollutant Generation*, and Table 3, *Expected Winter Daily Pollutant Generation*. As shown in Tables 2 and 3, the project operational emissions would not exceed the County's SLTs for VOC, ROG, NO_x, CO, SO_x, PM₁₀ or PM_{2.5}. Therefore, the project's operational emissions impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be less than significant.

Table 2, Expected Summer Daily Pollutant Generation

Sector	Estimated Emissions (lbs/day)					
	VOC	NOx	CO	Sox	PM ₁₀	PM _{2.5}
Mobile	3.74	3.24	37.35	0.10	9.67	2.50
Area	6.52	0.05	5.01	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total (Unmitigated)	10.26	3.29	42.35	0.10	9.67	2.50
Screening Level Thresholds (lb/day)	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

Daily pollutant generation assumes trip distances within CalEEMod.

The final numbers are all rounded within Excel and are reported as rounded numbers.

Table 3, Expected Winter Daily Pollutant Generation

Sector	Estimated Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Mobile	3.69	3.55	34.06	0.10	9.67	2.50
Area	6.08	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total (Unmitigated)	9.77	3.55	34.06	0.10	9.67	2.50
Screening Level Thresholds (lb/day)	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

Daily pollutant generation assumes trip distances within CalEEMod.

The final numbers are all rounded within Excel and are reported as rounded numbers.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would not result in an impact that was not previously identified in the GPU EIR with the incorporation of mitigation consistent with GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. As discussed in Air Quality 3(a), San Diego County is currently in non-attainment for O₃ under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O₃, PM₁₀, and PM_{2.5} under the California Ambient Air Quality Standard (CAAQS). O₃ is formed when VOCs and NO_x react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NO_x include any source that burns fuel. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Emissions of criteria pollutants associated with future development consistent with the GPU would result in a cumulatively significant impact associated with PM₁₀ and PM_{2.5}, and O₃ precursors under CAAQS. These emissions would primarily come from vehicles trips associated with new development under the GPU and equipment and construction materials used during construction of future development and infrastructure. Future development under the GPU would be required to comply with the RAQS, SIP, CARB

motor vehicle standards, APCD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and the GPU goals and policies. Mitigation measures Air-2.1 through Air-2.13 identified above would minimize impacts associated with non-attainment criteria pollutants. However, even with implementation of those measures, the GPU EIR found that criteria pollutants associated with future development consistent with the GPU would exceed the SLTs for PM₁₀, PM_{2.5}, NO_x, and VOCs. Additional mitigation measures were considered that would further minimize the potentially significant impacts; however, the County determined that their implementation would be infeasible. These mitigation measures were found infeasible as they would limit which construction contractors would be allowed to work within the County, restrict future development in areas identified for increased growth, require the County to monitor and enforce the use of architectural coatings at all construction projects which it does not have the funding or staff available, increase infrastructure costs, severely limit development projects and conflict with the GPU's objectives. Impacts would remain significant and unavoidable.

Project

The SDAB is designated under the California and National ambient air quality standards (AAQS) as non-attainment for O₃ and under the California AAQS as non-attainment for PM₁₀ and PM_{2.5}. Based upon the County guidelines, any project that conforms with the RAQS and does not exceed the SLTs, or can be mitigated to less than the SLTs, used as the threshold for determining a project's significant impacts, does not significantly add to a cumulatively considerable net increase in emissions with other projects.

The project is located in a rural area of the County, and construction activities occurring at the same time as construction of the project are not expected near the project site. It should be noted that project emissions are between approximately 65 and nearly 100 percent lower than County SLTs, as shown in Table 1, *Expected Maximum Daily Emissions*, above. Even if an identical project were constructed adjacent to the project site, cumulatively considerable construction impacts would not be likely. Given this, a less than significant cumulative construction impact would be expected. The project would not result in any adverse impacts to human health within the community due to air emissions.

The Project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Therefore, project operation would not 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, and impacts would be less than significant.

The project is located in a rural area and does not generate substantial traffic volumes. No signalized intersections with peak-hour trips exceeding 3,000 are located near the site. Therefore, the project would not be expected to result in a CO hotspot or cause an exceedance of the CO ambient air quality standards. As such, the project's contribution to localized CO impacts would be less than significant.

The project is proposing development that is consistent with the County's General Plan; thus, operational air emissions are considered to have been accounted for in the GPU EIR. The proposed project is consistent with the County's General Plan as these operational air emissions are considered to have been accounted for in the GPU EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Further, as described under Section 3(b), Project construction and operations would not result in emissions of criteria air pollutants greater than the County's SLTs. Therefore, the project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

As previously discussed, 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 within the GPU EIR, because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that future development consistent with the GPU would result in potentially significant emission of diesel particulate matter that would result in a potentially significant impact to sensitive receptors. Mitigation measure Air-4.1, which requires the use of policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for listing sensitive land uses, was identified that would minimize the potentially significant impact associated to sensitive receptors; however, not to below a level of significance. Some additional mitigation measures were identified that would reduce impacts associated with sensitive receptors to below a level of significance; however, the County determined that their implementation was infeasible. These mitigation measures were determined to be infeasible as the County cannot monitor and enforce all construction activities or diesel traffic within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from off-road construction equipment and vehicles. Impacts would remain significant and unavoidable.

Project

Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The nearest potential sensitive receptors to the project site are the residences located to the south, west, north, and east; Montecito High School, located 0.4

mile north of the project site; and a Montessori Children's Elementary School located 0.2 mile north of the project site. Due to the short-term construction duration and the limited construction emissions, there is very low potential for fugitive dust or diesel particulate matter (DPM) to impact sensitive receptors during construction. In addition, the project would incorporate project design feature ensuring that all construction equipment used on-site be rated Tier 4 final as defined by United States Environmental Protection Agency/CARB standards. The grading contractor shall submit a letter to the County of San Diego committing to his requirement.

Based upon air quality modeling, worst-case PM₁₀ from exhaust onsite during each of the construction tasks would cumulatively produce 0.00682 tons over the construction duration 552 days or an average of 0.000130 grams/second. The maximum cancer risk for the project was found to be 9.79 per one million exposed over the construction duration which would be considered a less than significant impact if T-BACT equipment is utilized. The cancer risk value represents the point of maximum modeled concentration at a conservative radial distance from the project boundary and not a specific offsite sensitive receptor. Since Tier 4 Final T-BACT equipment would be utilized as a design feature and as a condition of the project, the project construction activities would generate less than significant cancer health risks by remaining below the SDAPCD Rule 1200 Significance threshold of 10 in one million with implementation of T-BACT.

There are also known acute and chronic health risks associated with diesel exhaust which are considered non-cancer risks. These risks are calculated to yield a Health Hazard Index of less than one or 0.075 or less. Therefore, acute or chronic non-cancer risks are expected to be less than significant or below the SDAPCD Rule 1200 hazard index threshold of 1.0 with implementation of Tier 4 Final T-BACT equipment.

The Project is a residential use and would not generate TACs once fully operational. Given this, a less than significant health risk would be expected during project operations.

The project's construction and operational air pollutant emissions would not expose sensitive receptors to substantial pollutant concentrations and would result in a less than significant impact with project design measures in place.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. The project would have a less-than-significant impact to sensitive receptors. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. The GPU EIR found that, for odor sources such as agricultural operations and landfills in San Diego County, the County odor policies enforced by the APCD, including Rule 51 and County Code Sections 63.401 and 63.402, prohibit nuisance odors and identify enforcement measures to reduce

odor impacts to nearby receptors. Development consistent with the GPU that would have the potential to result in nuisance odors would be required to comply with these regulations and, therefore, impacts associated with objectionable odors would be less than significant and no mitigation is necessary.

Project

The proposed project would involve asphalt laying activities during construction that would be short term and are expected to be less than significant. The operations would consist of residential uses which do not typically generate offensive odors. Based on this, operational odor impacts would be less than significant odor impact. Therefore, impacts associated with other emission sources adversely affecting a substantial number of people would be less than significant.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures (Air-2.5, Air-2.6, Air-2.7, and Air-2.9 contained within the GPU EIR will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the project:			
a) 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?	☐	☐	☐
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?

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?

☐ ☐ ☐

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native residents or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ ☐ ☐

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ ☐ ☐

Discussion

The following technical study was prepared for the project:

Biological Resource Report, prepared by Alden Environmental, Inc. dated June 8, 2026.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that the GPU would have the potential to result in direct and indirect impacts to special status plant and wildlife species and their habitat. Mitigation measures Bio-1.1 through Bio-1.7 were identified to minimize potentially significant impacts. Mitigation measure Bio-1.1 created a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. Mitigation measures Bio-1.2, Bio-1.3, and Bio-1.4 implement and revise existing Habitat Conservation Plans/Polices to preserve sensitive resources within a cohesive system of open space, implement conservation agreements through Board Policy I-123, and coordinate with nonprofit groups and other agencies to acquire preserve lands, respectively. Mitigation measure Bio-1.5 states to utilize County Guidelines for Determining Significance for Biological Resources to identify impacts to biological resources and the County's Geographic Information System to located special status species populations on or near project site to avoid or mitigate impacts as appropriate. Mitigation measures Bio-1.6 and Bio-1.7 implement the Resource Protection Ordinance (RPO), Biological Mitigation Ordinance (BMO), and Habitat Loss Permit (HLP) Ordinance and minimize edge effects from development projects located near sensitive

resources by implementing the County's Noise Ordinance, Groundwater Ordinance, and Landscaping Regulations, and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. However, even with mitigation measures in place, impacts would remain significant. An additional mitigation measure was identified that would fully reduce impacts to below a level of significance; however, the County determined that its implementation would be infeasible. This mitigation measure was determined to be infeasible as the adoption of MSCP Plans for North County and East County would require the approval at the Federal and State levels which the County cannot guarantee ahead of time and the timing of these programs may not coincide with GPU impacts in these areas. Impacts remained significant and unavoidable.

Project

In compliance with GPU EIR Mitigation Measure Bio 1-5, a *Biological Resources Report* was prepared by Alden Environmental for the project utilizing the County Guidelines for Determining Significance for Biological Resource to identify impact.

The project site is approximately 19.65 acres; however, only 18.36 acres would be developed/disturbed and were included in the survey area. (As previously stated, APN 284-205-01 is excluded from the Tentative Map and would not be physically subdivided or developed; however, it would remain as a remainder parcel and its allowable residential density would be transferred to the project.) The survey area consists of eucalyptus woodland, disturbed habitat, and developed land. No special status plant species were observed on-site, and none are expected to occur because most of the survey area appears to have been under some form of disturbance since at least 1953 and is regularly tilled for fuel management purposes. Eucalyptus woodland and disturbed habitat are classified as Tier IV habitat/land cover types and are not considered sensitive. Developed land is also a non-sensitive land cover type. Non-native grassland occurs within the 100-foot-wide adjacent mapping buffer on the opposite side of San Vicente Road and is classified as a Tier III sensitive community; however, because it is limited to the mapping buffer and does not occur on the project site, it would not be directly affected by the proposed project.

The approximately 18.36-acre development area of the project site would be directly impacted by project construction. This area includes 0.26 acres of eucalyptus woodland, 16.50 acres of disturbed habitat, and 1.60 acres of developed land. An additional 2.75 acres would be impacted off-site for roadway and utility improvements, affecting 0.02 acres of eucalyptus woodland, 1.78 acres of disturbed habitat, and 0.95 acres of developed land. Construction of off-site roadway and utility improvements would affect an additional 2.75 acres, including 0.02 acre of eucalyptus woodland, 1.78 acres of disturbed habitat, and 0.95 acre of development land. All development impacts would be to non-sensitive eucalyptus woodland, developed land, and disturbed habitat. No special status plant species were observed or are expected to occur on-site.

The Crotch's Bumble Bee is currently in candidacy to become state listed as California Endangered or Threatened Species. A focused field survey was performed for the Crotch's Bumble Bee (*Bombus crotchii*) because some potential nectar resources are present. Crotch's Bumble Bee was not observed onsite during any of the field surveys.

Although burrowing owl can occupy open areas, including some disturbed and ruderal areas, most of the project site is regularly disced/tilled for fire-fuel management purposes. This vegetation-removal activity disturbs the soil and leaves little opportunity for the development of stable ground-squirrel burrow systems required by burrowing owl. No potential burrowing owl burrows were observed on the site. The eucalyptus woodland and ornamental portions of the site also lack suitable burrowing substrate and open ground. Based on the absence of suitable burrows and long-term disturbance conditions, the project site is considered to have low potential to support burrowing owl; a focused burrowing owl survey would not be warranted.

The project site supports eucalyptus woodland that could support nesting of Federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code protected birds. The project could impact nesting success of tree-nesting raptors and ground-nesting raptors through grading, clearing, fire fuel modification and/or other noise-generating activities such as construction. The project would be required to implement GPU EIR mitigation measure Bio 1.6. that requires breeding season avoidance to prevent brushing, clearing, grading, and/or other construction activities that may disturb nesting birds during the raptor breeding season (January 15- July 31). Implementation of mitigation measure Bio 1.6 would reduce potential impacts to below a level of significance. Impacts would be less than significant with implementation of mitigation.

Indirect Impacts

Potential indirect impacts can occur to adjacent sensitive biological resources because of project construction (from fugitive dust and noise, for example). Other potential indirect impacts can occur to adjacent sensitive biological resources from night lighting; invasive, non-native plant species; and public access due to occupation of the built project. The project site is, however, surrounded by non-sensitive vegetation communities and existing development. Therefore, there are no sensitive biological resources that would be affected indirectly by project construction or occupation.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. Project impacts were determined to be less than significant with implementation of project mitigation measures consistent with the GPU EIR mitigation measures Bio 1.6. Therefore, the project would be consistent with the analysis in the GPU EIR and would not increase impacts identified in the GPU EIR.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. The GPU has the potential to result in direct and indirect impacts to riparian habitat and other sensitive natural communities. Mitigation measures Bio-2.1 through Bio-2.4 were identified to

minimize the project's potentially significant impacts associated with the riparian habitat and sensitive natural communities. Mitigation measure Bio-2.1 includes revisions of the County's ordinance relating to water conservation for landscaping to incorporate appropriate plant types and regulations requiring planting of native, non-invasive plant species in new development. Mitigation Measure Bio-2.2 requires that development projects to obtain CWA Section 401/404 permits for all project-related disturbances of waters of the U.S. and/or associated wetlands and obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds. Mitigation measure Bio-2.3 states that whenever feasible ensure that wetlands and wetland buffer areas are adequately preserved to maintain biological functions and values. Mitigation measure Bio-2.4 requires the implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to project wetlands. However, even with these mitigation measures implemented, the GPU allows land uses and development to occur in areas outside of any adopted regional conservation plan thereby resulting in direct, indirect, and cumulative impacts to sensitive habitats. Impacts remained significant and unavoidable.

Project

As stated in the GPU EIR, riparian communities occur along rivers, streams, and other drainages in the unincorporated County. A survey of the project site was conducted as part of the Biological Resources Report and found no riparian habitats or sensitive natural communities on-site. The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the proposed project's impacts would be less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded that the GPU has the potential to result in impacts to Federal wetlands. Mitigation measures Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4 listed above under 4(a) and 4(b) would be implemented to mitigate impacts to Federally protected wetland to a less than significant level. Impacts were found to be less than significant with implementation of mitigation measures.

Project

As part of the Biological Resources Report, a site visit was conducted on July 5, 2025, to map and assess the project site. During the site visit, an assessment was conducted for the presence or absence of aquatic features potentially subject to regulation under federal, State, or local jurisdiction, including Section 404 of the Clean Water Act, Section 401

Water Quality Certification, California Fish and Game Code Section 1602, and County Resource Protection Ordinance (RPO). This assessment included a review of current and historical aerial imagery, the U.S. Fish and Wildlife Service National Wetlands Inventory (NWI), and the National Hydrography Dataset (NHD). Soils data from the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey was also reviewed to assess hydric soil potential. Field documentation included photo points focused on the area in question.

The assessment and review found that there are no County RPO wetlands or potential Army Corps of Engineers, California Department of Fish and Wildlife (CDFW), and RWQCB jurisdictional features on-site. Although a linear area of the site appears greener and wetter in aerial imagery, this condition results from localized runoff infiltration and not from stream flow, wetland hydrology, or other jurisdictional factors. Based on the site visit, the area is best characterized as upland and does not meet criteria for regulation under Federal, State, or local jurisdiction. As such, the project would not result in impacts to County RPO wetlands or potential Corps, CDFW, and RWQCB jurisdictional features. No permits would be required, as none of these resources occur on the project site. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to Federally protected wetlands as significant with mitigation. However, the project would not result in significant impacts to Federally protected wetlands, as described above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that the GPU has the potential to result in impacts to wildlife movement corridors and the use of native wildlife nursery sites. Mitigation measures Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3 from 4(a) and 4(b) above would be implemented to reduce impacts to wildlife movement corridors and nursery sites. Impacts were found to be less than significant with implementation of these mitigation measures.

Project

The project site does not provide habitat connectivity, is not a part of a wildlife movement corridor, and does not support nursery sites (i.e., established locations used repeatedly by some wildlife species for breeding purposes such as heron rookeries and bat maternal colony roosts). There are no unique features/resources such as habitat linkages, rock outcroppings, or sensitive soils on-site. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the project impacts were determined to be less than significant for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase

impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded that future projects proposed under the GPU would be required to comply with applicable local policies and ordinances and applicable Habitat Conservation Plans and Natural Community Conservation Plans. Regulatory processes to ensure compliance are already in place and, therefore, would not be affected by the GPU. Thus, a potentially significant impact associated with conflicts with local policies and ordinances would not occur. Impacts were found to be less than significant.

Project

The project site is located within the North County Multiple Species Conservation Program (MSCP) Subarea Plan Area but is outside of the Open Space Network. Development project construction would impact approximately 18.36 acres of the 19.65-acre project site consisting of eucalyptus woodland, disturbed habitat, and developed land. The project would be consistent with the County's Guidelines for Determining Significance for Biology, and the RPO. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances, as well as habitat conservation plans, and natural community conservation plans as less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures (Bio-1.5, and Bio-1.6) contained within the GPU EIR will be applied to the project.

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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5. Cultural and Paleontological 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 paleontological resource or site? | ☐ | ☐ | ☐ |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ |

Discussion

The following technical studies were prepared for the project:

Cultural Resources Study for the 915 Ninth Street Project, prepared by BFSA Environmental Services, dated June 26, 2026.

Phase II Cultural Resources Assessment for the 915 Ninth Street Project, prepared by BFSA Environmental Services, dated June 26, 2026.

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that implementation of the GPU could disturb designated and potentially significant historical resources during demolition, destruction, alteration, or structural relocation as a result of development or redevelopment. The County has a 50-year threshold to review for consideration of mitigation for projects affecting historic resources to ensure their consistency with CEQA Guidelines and the requirements of the California Register of Historic Resources and the National Register of Historic Places. Therefore, the GPU EIR concluded that the GPU would result in potentially significant impacts to historical resources and identified a GPU policy and measures to mitigate impacts to historical resources to below a level of significance.

Mitigation measures Cul-1.1 through Cul-1.8 include utilization of the RPO, CEQA, Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic resources; provide incentives through the Mills Act to encourage restoration, renovation, or adaptive reuse of historic resources; initiate new effort to identify and catalog historic and potentially historic resources; support Historic Site Board in their efforts to provide oversight for historic resources; ensure landmarking and historical listing of County owned historic sites, implement and update the County's Guidelines for Determining Significant for Cultural Resources to identify and minimize adverse impacts; identify potentially historic structures within the County and enter into

the Department of Planning and Land Use property database; and revise the RPO to apply to the demolition or alteration of identified significant historic structures. Implementation of these mitigation measures and the GPU policy were found to reduce impacts to below a level of significance.

Project

The project site was historically utilized for residential purposes. The project site includes a single-family residence, barn and four associated ancillary structures. According to the current project design, the barn and ancillary structures would be demolished, and the single-family residence would remain as part of the project. To protect and preserve the existing residence a Use, Maintenance, and Repair easement would be placed over the residence. As such, only the barn built in 1890 and ancillary structures built in 1900, 1935, and 1950 would be evaluated under California Register of Historical Resources (CRHR).

A *Cultural Resources Study* was conducted for the project site in accordance with GPU EIR mitigation measure Cul-1.1. The Study included an archaeological records search of a one-mile radius of the project site, identifying one cultural resource and one historic address recorded within the project site.

The 915 9th Street single-family property is currently listed in the Office of Historic Preservation's (OHP) Built Environment Resource Directory (BERD) for the County of San Diego, noting that the 915 9th Street single-family property is eligible for listing on the NRHP under Criterion 3 for reflecting distinctive characteristics of Rural Architecture within the context's period of significance (1870 to 1940).

The 915 9th Street property consists of a single-family residence, a barn, and four ancillary structures (a water tank house, a pump house, a storage shed, and a woodshed). The project proposes removal of the barn and ancillary structures. Demolition of the potentially historic barn and ancillary structures requires approval from the County of San Diego. CEQA eligibility criteria were used to evaluate the structures as potentially significant historic property. The Cultural Resources Study used criteria for listing on the CRHR to determine the potential significance of the barn and ancillary structures. The Cultural Resources Study evaluation found the barn is currently in very poor condition and damage to the structure has compromised the integrity to the barn. The northern two-thirds of the barn have caved in resulting in a loss of materials and original design. Additionally, two types of corrugated metal sheets are present on the roof, suggesting that portions of the original roofing have been replaced. Although the 915 9th Street single-family property was eligible under Criteria 3 for listing on the NRHP, the Cultural Resources Study concluded that the barn and ancillary structures lack integrity and do not embody the distinctive characteristics of a type, period, region, or method of construction; nor do they represent the work of an important creative individual or possess high artistic values. Therefore, the barn and ancillary structures are unlikely to yield any important information regarding the historic development of the area. As such, the barn and ancillary structures are neither significant nor eligible for the CRHR. Impacts would be less than significant.

The survey also identified one historic isolate, Iso-1, on the project site. Iso-1 consists of one historic well head located in the northeast corner of the parcel located east of San Vicente Road and Eleventh Street. There is no direct connection between the isolated water control feature and the historic single-family property. Furthermore, the well does not possess any integrity. As an isolate, the well head is not eligible for the CRHR and not considered a Historical Resources as defined by CEQA and does not require further evaluation. Impacts would be less than significant.

The project would not result in impacts to historical resources as none occur within the project site. No mitigation measures would be required.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The project would result in less than significant impact to historic resources. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that ground-disturbing activities, such as clearing, excavation and grading, have the potential to damage or destroy archaeological resources that may be present on or below the ground surface, particularly in areas that have not previously been developed. Implementation of the GPU would have the potential to result in a substantial adverse change in the significance of an archaeological resource, including the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory. Therefore, the GPU EIR concluded that the GPU would result in a potentially significant impact to archaeological resources, and mitigation measures were found to be necessary.

The GPU EIR identified mitigation measures Cul-2.1 through Cul-2.6 to mitigate impacts to below a level of significance. Mitigation measure Cul-2.1 requires for development of management and restoration plans for identified and acquired properties with cultural resources, while Cul-2.2 requires identification and acquisition of important resources through collaboration with agencies, tribes, and institutions. Cul-2.3 supports the dedication of easements that protect important cultural resources. Cul-2.4 requires protection of significant cultural resources through regional coordination and consultation with the Native American Heritage Commission and local tribal governments. Cul-2.5 calls for protection of undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources. Cul-2.6 protects significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies and institutions. Implementation of

these policies and mitigation measures were found to reduce impacts to below a level of significance.

Project

A Cultural Resources Survey was conducted for the project site by BFSA Environmental Services. Based on an analysis of records and a survey of the property one prehistoric archaeological resource (Site-Temp-1) was identified on the project site.

The survey identified one prehistoric resource, Site Temp-1, on the project site. Site Temp-1 consists of one bedrock milling feature located near the southeast corner of the parcel located south of I Street and west of 9th Street. The bedrock milling feature includes three milling slicks and one mortar and measures approximately 3.3 by 3.3 meters. No prehistoric historical artifacts were located on the subject property. Avoidance of the resource would not be feasible as it would result in the loss of a residential unit within the proposed project design. Therefore, in order to determine if the proposed project constitutes a potential impact to archaeological resources, as defined by CEQA, the bedrock milling feature associated with Site Temp-1 was evaluated to determine if it is significant.

A Phase II Cultural Resources Assessment was prepared to evaluate Site Temp-1. This assessment found that aside from the milling features, no other cultural elements were identified, and the subsurface tests did not produce any artifacts or evidence of occupational deposits. therefore, Site Temp-1 does not qualify as a significant resource as defined by the County of San Diego Historical Resources Guidelines and CEQA criteria. Impacts would be less than significant.

Regardless of the results of any focused studies of the cultural resources within the property, it is recommended that all future grading or earthwork within the project be subject to an archaeological and tribal monitoring program. The records search results and pedestrian survey found that the property was previously used for residential purposes as early as 1890. These impacts to the subject property occurred prior to CEQA and the adoption of environmental laws requiring the appropriate identification and handling of cultural resources. This characterization of the property as superficially disturbed is relevant to the consideration of cultural resources being present within the project. When parcels are cleared, disced, or otherwise disturbed, evidence of surface artifact scatters is lost. Regardless of whether cultural resources have ever existed within this property, the current state of the area appears to have affected the potential to discover any surface scatters of artifacts. Therefore, given the uncertainty of prior impact levels to the property coupled with the property's location near natural sources of water and the presence of a prehistoric resource within the project, and in accordance with GPU EIR mitigation measure Cul-2.5, monitoring of grading would be required.

Consistent with the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through implementation of the following mitigation

measures: grading monitoring under the supervision of a County-approved archaeologist and a Kumeyaay Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul 2.5. The project would be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

Pre-Construction

- The project proponent will Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities in the event of a significant discovery. The project Archaeologist shall perform the monitoring duties before, during and after construction.
- Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.

Construction Monitoring

- Both the Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will examine fill soils to ensure that they are negative for cultural resources. If cultural resources are identified:
 - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
 - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.

If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for

non-unique cultural resources. The preferred option for preserving cultural resources is preservation (avoidance).

Human Remains

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

Rough Grading

- Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally affiliated tribe who requests a copy.

Final Grading

- Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally affiliated tribe who requests a copy.

Cultural Material Conveyance

- The final report shall include evidence that any prehistoric materials collected have been curated at a San Diego curation facility or Tribal curation facility that meets Federal standards per 36 CFR Part 79 or alternatively have been repatriated to a culturally affiliated tribe.
- The final report shall include evidence that all historic materials have been curated at a curation facility that meets Federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The project would incorporate the GPU EIR mitigation measure Cul-2.5, which requires monitoring. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant with mitigation. Implementation of the GPU would have the potential to directly or indirectly destroy a unique paleontological resource or site. Areas of the County designated for high density land uses, such as village residential, commercial, or industrial, that also have a high or moderate paleontological sensitivity would have the potential to significantly impact paleontological resources from extensive excavation or grading activities associated with development. Therefore, the GPU EIR concluded that the GPU would result in a potentially significant impact to unique paleontological resources, and specific implementation programs are identified as mitigation. Mitigation measure Cul-3.1 requires the implementation of the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, requires a paleontological resources monitor during grading when appropriate and apply mitigation when impacts are significant. Cul-3.2 requires implementation of the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impact to paleontological resources.

Project

A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project site is located on geological formations with a low potential to contain unique paleontological resources. Therefore, the project would not have the potential to directly or indirectly destroy a unique paleontological resource. As such, a paleontological grading monitoring program is not required.

As previously discussed, the GPU EIR determined impacts on unique paleontological resources as less than significant with mitigation. As the project would have less than significant impacts for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase

impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that implementation of the GPU would result in new development that would have the potential to disturb human remains, including those discovered outside of formal cemeteries. Ground-disturbing activities from the development of land uses proposed in the GPU would have the potential to cause adverse impacts to human remains. The GPU EIR identified mitigation measure Cul-4.1 that includes regulations and procedures for discovery of human remains to reduce these impacts to below a level of significance. The GPU EIR also required incorporation of mitigation measures Cul-1.1 and Cul-1.6, listed above under 5(a), to reduce potentially significant impacts to below a level of significance.

Project

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. In the unlikely event that human remains are encountered onsite during earth-disturbing activities, GPU EIR mitigation measure Cul-2.5 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed project determined impacts to human remains as less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

Conclusion

With regards to the issue area of cultural/paleontological 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-1.1 and Cul-2.5) would be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
6. Energy – 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

The following technical study was prepared for the project:

Ramona 9th Street Energy Usage Letter, prepared by Ldn Consulting, Inc, dated March 27, 2026.

Energy use was not specifically analyzed in 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 in 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 greenhouse gases (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 design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG emissions. 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 gasoline consumption on the project site during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (California Public Resources Code, Section 21100(b)(3)). Neither the law nor the CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations, 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 visitors and employees.

Construction

During the construction phases of the project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. Based on the equipment quantity, work time, horsepower, the project would consume approximately 39,230.76 gallons of diesel for construction. Construction related energy use from worker commuting, vendor trips, and haulage activities during the construction period would amount to 437,987.48 miles and would consume approximately 18,176.48 gallons during construction. On-road vehicles are regulated by state and Federal regulations and vehicular fleet efficiencies are getting better each year. Additionally, the equipment required to construct the project would be maintained and operated in accordance with the equipment manufacturers recommendations. Since the construction equipment would not be in excess of what would be required to complete the project, the construction activities would not be wasteful, inefficient, or unnecessary as related to the required consumption of energy resources during project construction. Therefore, a less than significant energy impact would be expected during the construction activities of the project.

Operations

Energy-Utility Demand

The project has been designed to be all electric and would not have natural gas or propane installed onsite. The all-electric project would use 525,235 kWh of electricity per year. The project would be required to implement the latest Title 24 California Building Code requirements at the time building permits are issued. The project would be all electric and would comply with CALGreen Tier 2 to include greater than 30 percent indoor water savings and drought-tolerant landscaping and would be EV/solar ready. Further reductions in energy use would be expected with the incorporation of the County's Climate Action Plan (CAP) measures. As such, energy use associated with project operations would not result in wasteful, inefficient, or unnecessary use of energy.

Energy-Vehicular Usage

The project would generate an estimated 869 average daily trips (ADT) and 960,807 vehicle miles traveled (VMT) per year, resulting in an estimated consumption of approximately 101,241 gallons of fuel annually. This level of fuel consumption is consistent with typical suburban residential developments of similar size. Fleet efficiency is increasing due to National Highway Traffic Safety Administration (NHTSA) standards and California's ZEV requirements, so fuel demand would decrease over the project's life. Therefore, vehicle use from the project would have a less than significant impact on energy resources.

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 nor would it result in the wasteful, inefficient, or

unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines. Project impacts associated with energy would not be significant.

- 6(b) Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The proposed project would be designed and constructed in compliance with the current California Building Code, Title 14 Energy Standards, and CALGreen requirements. Energy efficiency and conservation measures include high-performance building envelopes, energy-efficient HVAC and water heating systems, and ENERGY-STAR-rated appliances and lighting. In addition, rooftop solar photovoltaic systems would be provided in accordance with Title 24 requirements. Battery energy storage systems are not required by the California Building Code; however, the project design allows for future installation should homeowners elect to add such system. Electric Vehicle ready garage infrastructure would be provided consistent with CALGreen including electrical capacity and conduit to allow homeowners to install electric vehicle charging equipment of their choosing in the future.

The project would be consistent with sustainable development and energy reduction policies such as Policy COS-15.4, through compliance with the most recent Title 24 Energy Efficiency 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. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficient.

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 regard 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained in 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
7. Geology and Soils – Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic groundshaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐
c) Be located on a geologic unit or soil that is instable, 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?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐

Discussion

The following technical study was prepared for the project:

Updated Preliminary Geotechnical Evaluation, Proposed 9th Street Major Subdivision, prepared by Petra Geosciences Inc., dated November 26, 2025.

- 7(a) The GPU EIR concluded this impact to be less than significant. The GPU EIR found that the GPU would allow development to occur in areas with geologic risks such as seismically induced ground shaking, liquefaction, and landslides. However, future development would be required to comply with all relevant Federal, State, and local regulations and building standards, including the California Building Commission (CBC) and County-required geotechnical reconnaissance reports and investigations. Therefore, impacts from seismically induced fault rupture, ground shaking, liquefaction, and landslides were found to be less than significant.

Project

The project site does not lie within an Alquist-Priolo Earthquake Fault Zone, liquefaction hazard zone, nor a landslide hazard zone. No active faults have been identified on the project site. The potential for active fault rupture at the site is considered to be very low.

The project site is mostly mapped within zones of “nominal” liquefaction potential and would be considered to have nominal liquefaction potential due to lack of groundwater and granite bedrock within 2.5 to five feet of the ground surface. The project site and immediate area exhibit level topography within no existing slopes within or immediately adjacent to the property. No landslide or rockfalls are mapped within or in proximity to the subject site. The County of San Diego, including the project site, is located in a seismically active area of southern California and may be subject to seismically related ground shaking. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the CBC. In addition, the project would be required to comply with the County’s Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a building permit. The report would review the qualities of the soil, its expansive characteristics, relative compaction, and any soil constraints, which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the Building Permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures to be constructed on the site. Therefore, compliance with the CBC and the County Building Code would ensure that the project would not result in a significant impact.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed project would have a less-than-significant impact, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. The GPU EIR found that the GPU allows the development of designated land uses that would have the potential to expose topsoil to erosion from water or wind resulting from construction or operational activities. Additionally, the development of land uses would result in a permanent increase in impermeable areas, which would increase surface water runoff and associated erosion.

All construction activities occurring under the GPU would be required to comply with CBC and the County’s Grading Ordinance, both of which would ensure implementation of appropriate measures during grading and construction activities to reduce soil erosion. The County Grading Ordinance also requires all clearing and grading to be carried out with dust control measures including watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures that would reduce potential for erosion from wind. Construction occurring under the GPU would be required to comply with the National Pollutant Discharge Elimination

System (NPDES) permit program, which requires stormwater pollution prevention plans (SWPPPs) to be prepared and best management. Compliance with these regulations would reduce potential impacts to below a level of significance.

Project

Development of the project has the potential to expose topsoil to erosion during earthmoving and grading activities. Project grading requires approximately 176,831 cubic yards of cut and 60,900 cubic yards of fill. 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. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. Additionally, the project would be required to implement best management practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan (SWQMP) and a Stormwater Pollution Prevention Plan (SWPPP).

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. Build-out of the GPU would have the potential to result in hazards associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. However, future development under the GPU would be required to comply with Federal, State, and local building standards and regulations, including the CBC and County required geotechnical reconnaissance reports and investigations. Compliance with such regulations would reduce impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse to a less than significant level.

Project

As indicated in response 7(a), the project site is mostly mapped within zones of “nominal” liquefaction potential and would be considered to have nominal liquefaction potential due to lack of groundwater and granite bedrock within 2.5 to five feet of the ground surface. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the CBC. In addition, the project would be required to comply with the County’s Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a building permit. Therefore, compliance with the CBC and the County Building Code would ensure that the project would not result in a significant impact.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the project would have a less-than-significant impact with the incorporation of standard conditions, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The GPU designates land uses that would allow for the development of structures on potentially expansive soils. Therefore, future construction projects in San Diego County were found to be affected by expansive soils. However, projects would be required to comply with all applicable Federal, State, and local regulations, including the International Building Code (IBC) and CBC. Compliance with such regulations would reduce potentially significant impacts to below a level of significance.

Project

The near surface soils within the project site exhibit expansion indices that are less than 20 and are considered non-expansive. In addition, the project would be in compliance with the Building Code, County Grading Ordinance, and implementation of standard engineering techniques would ensure structural safety.

As previously discussed, the GPU EIR determined impacts from expansive soils 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The GPU designates land uses that have the potential to allow development to occur in areas where soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. The GPU EIR states that all future development projects would be required to comply with all applicable Federal, State, and local regulations related to septic tanks and wastewater disposal, including County Department of Environmental Health (DEH) standards. Compliance with such regulations were found to reduce the potential for septic systems to be located in soils incapable of supporting such systems. Therefore, impacts were found to be less than significant.

Project

The project site is served by the Ramona Municipal Water District. The project would connect to District's existing water and sewer facilities located in 9th Street and 10th Street. The project would not include the use of septic tanks or alternative wastewater disposal systems. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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 by adhering to the project conditions of approval, which are consistent with the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
8. Greenhouse Gas Emissions – Would the project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted or the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐

Discussion

The following technical study was prepared for the project:

County of San Diego CAP Consistency Review Checklist, prepared by Atlantis Group Land Use Consultants, dated July 29, 2025.

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The goal of Assembly Bill (AB) 32 was to reduce 2020 emission to 1990 levels. The GPU was found to allow for additional growth in the County that would contribute to additional GHG emissions. Impacts to GHG emission were found to be potentially significant and

mitigation was required. Mitigation measures CC-1.1 through CC-1.19 were introduced to reduce the County's operation GHG emissions to a level below the 1990 levels and, when combined with Federal, State, and regional programs, reduce the Community GHG emissions to 1990 levels. These mitigation measures called for the preparation of a County Climate Change Action Plan to include detailed and comprehensive emissions reduction measures. Implementation of mitigation measures CC-1.1 through CC-1.19 were found to reduce impacts to below a level of significance

Project

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of "less than significant" for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. The CAP's attainment of the County's GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG-reduction features into the construction and operation of development projects (including County-initiated and privately-initiated projects).

The CAP Consistency Review Checklist establishes a two-step process that project proponents shall follow to determine if projects are consistent with the CAP and whether

they may have a significant cumulative impact under the County's adopted GHG thresholds of significance.

Step 1 of the project's CAP Consistency Review Checklist demonstrates consistency with the General Plan regional category and land use designations and the uses and development density, and intensity allowed under the Zoning Ordinance. The proposed project is consistent with the General Plan land use designations of Village Residential (7.3 du/ac) and Village Residential (two du/ac). Village Residential 7.3 (VR07.3) allows a maximum base density of 19 dwelling units on 2.64 acres; therefore, the project's proposed 16 dwelling units would be consistent with the land use designation. Village Residential 2 (VR-2) allows a maximum base density of 35 dwelling units on 17.02 acres; therefore, the project's proposed base density of 35 dwelling units would be consistent with the land use designation. The project is utilizing a Density Bonus Law application that proposes a total of 15 percent (eight units) of the base units set aside as very low income affordable and would implement AB 1287 with an additional five percent (three units) of the base units set aside as moderate income affordable. In total, the area mapped VR-2 would be comprised of 72 new dwelling units and one existing to remain single family home.

As determined under Step 2 of the project's CAP Consistency Checklist, the project would be consistent with the strategies and actions of the CAP, including built environment and transportation, energy, and water and wastewater. The project does not propose any cold storage or refrigerate warehouse facilities, and the electrification of loading docks would not be applicable to the project. The project would not include multi-family or non-residential construction and thus electric vehicle charging infrastructure installation and preferential parking for electric vehicles would not be required. The project does not propose any offsite roadway improvements beyond standard frontage, and no sidewalk or bikeways are identified in the County's Active Transportation Plan along the project frontage. As described in the CAP Consistency Review Checklist and required by County laws and regulations, the project would implement the following design features (included as conditions of approval by the County): the project would be all electric, comply with Tier 2 CALGreen requirements including 30 percent indoor water savings, EV/solar ready, and drought-tolerant landscaping that complies with the County's Landscape Ordinance. The County has not adopted a native tree ordinance, and there are no native trees on-site; thus, tree preservation would not apply to the project. The project would be consistent with the County's CAP and therefore would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

As previously discussed, 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 8(b) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded that the climate change impacts that would be most relevant to the unincorporated County were the effects on water supply, wildfires, energy needs, and impacts to public health. Impacts that may have affected the County as a result of climate change were found to be potentially significant. Mitigation measures CC-1.1 through CC-1.19 mentioned above would be implemented to reduce impacts to less than significant.

Project

As stated in the CAP Consistency Checklist prepared for the project (Atlantis Group, July 2025), the project would be consistent with the General Plan and Ramona Community Plan. Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. Therefore, the project would not conflict with SANDAG's 2025 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the project's proposed land uses are consistent with the County's General Plan land use designation, the project would not conflict with the General Plan or SANDAG's Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the project's impacts related to GHG emissions would be less than significant.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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?	☐	☐	☐
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
g) Expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐
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

The following technical studies were prepared for the project:

Fire Protection Plan, prepared by Dudek, dated June 2026.

Phase I Environmental Site Assessment, prepared by Stantec Consulting Services, Inc., dated October 9, 2024.

- 9(a) The GPU EIR concluded this impact to be less than significant. The GPU EIR found that the GPU would increase the transport, use, and disposal of hazardous materials. However, any future development, as designated under the GPU would be required to comply with applicable Federal, State, and local regulations related to hazardous materials. The required compliance with these regulations were found to ensure impacts related to transport, use, and disposal of hazardous materials would be less than significant.

Project

The project proposes construction of 88 single-family residences. The project site is largely vacant, undeveloped land, with the exception of residential structure and dilapidated barn located within the northeastern corner of the site. The existing residential structure would remain. The barn would be demolished as part of the project. Based on historical records and aerial photographs the existing development was constructed circa 1930's-1940's. There is potential for asbestos-containing materials (ACMs) and lead based paint (LBP) within the building materials. An ACM and LBP survey should be conducted to investigate potential presence of ACMS and LBP in accordance with applicable federal and local regulations, prior to demolition activities. If ACM or LBP materials are found, they would be abated in accordance with all applicable laws.

All construction and operational activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable Federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Typically, residential uses do not generate, store, dispose of, or transport large quantities of hazardous substances. Operation of the proposed development would include the storage and use of household hazardous materials and wastes. Typical household hazardous materials associated with the residential land uses could include cleaning products, paints, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, automotive lubricants, small combustion engine fuels and lubricants, expired pharmaceuticals, mercury thermometers, sharp or used

needles, and electronic wastes from household and car batteries. No special permits would be required for such limited use or disposal of common agents and products. Operation of the project would not expose on-site users or the surrounding community to significant health hazards from hazardous materials. Therefore, operation-related activities would not result in the release of hazardous materials into the environment and would have a less than significant impact.

As previously discussed, the GPU EIR determined impacts from transport, use, and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The GPU PEIR found that the GPU included land uses that have a high potential for hazardous materials usage to be located within one-quarter mile of an existing or proposed school or daycare. However, compliance with Federal and State regulations pertaining to hazardous wastes, including CEQA Guidelines specified above, would ensure that risks associated with hazardous emissions and schools would remain below a level of significance.

Project

The Montessori Children's Elementary School is within one-quarter mile of the project. However, the project would not emit hazardous emissions and the transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable Federal, State, and local regulations that control hazardous material handling. 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 previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(c) The GPU EIR concluded this impact to be less than significant. The GPU concluded that the implementation of GPU land uses and development could be located on a site such as those pursuant to Government Code 65962.5, burn dump sites, active, abandoned or closed landfills, areas with historic or current agriculture, or area with petroleum contamination. However, it was found that compliance with applicable existing regulations and processes would ensure that the GPU would not result in significant hazards to the public or the environment from future development on existing hazardous materials sites.

Therefore, impacts associated with existing hazardous material sites were found to be less than significant.

Project

Based on a review of EnviroStor and GeoTracker (accessed October 8, 2025) regulatory databases, the project site has not been subject to a release of hazardous substances. The Phase I Environmental Site Assessment prepared for the project site did not find any evidence of any known or suspected recognized environmental conditions (RECs), Controlled RECs, or Historical RECs at or near the project site. 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 previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that, in general, land uses proposed under the GPU within the vicinity of public airports include rural lands, open space, semi-rural lands, and Federal or State land. However, under implementation of the GPU, some public airports, such as Fallbrook Community Airpark, were found to have adjacent land uses such as village residential, which would maintain higher density populations. Although required to comply with the Airport Land Use Compatibility Plans (ALUCP), development within the Airport Influence Area (AIA) of a public airport was found to have the possibility of increasing the risk of people living or working in these areas to hazards associated with airport operations. Therefore, impacts were found to be potentially significant associated with public airports and specific implementation programs were identified as mitigation.

Mitigation measures Haz-1.1 through Haz-1.5 were identified to mitigate impacts to below a level of significance. These mitigation measures require the implementation of the Guidelines for Determining Significant Airport Hazards when reviewing new development, participation in the development of ALUCPS and future revisions, review of the AICUZ when reviewing new development project, facilitation of coordination between the County of San Diego Department of Public Works and County Department of Planning and Land Use staff when planning new airports or changes to current airport, and coordination with the San Diego County Regional Airport Authority and County Airports for issues related to airport planning and operations.

Project

The project site is located approximately 3.5 miles east of the Ramona Airport and is within the ALUCP for the Ramona Airport. The project site is also within the Airport Influence Area (AIA), Airspace Protection, Overflight Boundary, and Federal Aviation Administration Part 77 Noticing Area. The project is proposing construction of two-story single-family homes that would not be greater than 30 feet in height. Furthermore, the project does not propose construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded that the GPU could result in land use designations that allow development within two miles of a private airport and therefore was found to have the potential to result in safety hazards for people residing or working in the project area. Potentially significant impacts associated with private airports could result and mitigation was required.

The GPU EIR identified mitigation measures Haz-1.1 through Haz-1.5, described above under 9(d), and mitigation measure Haz-2.1 requiring the implementation and revision as necessary to the Zoning Ordinance requiring Multiple Use Permits for private airports and heliports. Implementation of these mitigation measures were found to reduce impacts to below a level of significance.

Project

The project is not within two miles of a private airstrip. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(f) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would increase land uses and development area that may not have accounted for the growth in existing Emergency Response and Evacuation plans and, therefore, was found to have the potential to impair Emergency Response and Evacuation Plans and result in potentially significant impacts.

Mitigation measures Haz-3.1 through Haz-3.3 were required to be implemented. These involve the facilitation of coordination between DPLU and the Office of Emergency service to implement and periodically update the Hazard Mitigation Plan, implementation of CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans, and preparation of Fire

Access Road network plans and include in Community Plans or other documents. Implementation of these mitigation measures were found to reduce impact to less than significant.

Project

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 project site 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 that could interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan.

9(f)(v) DAM EVACUATION PLAN:

The project site is not within a Dam Inundation Zone. Therefore, the project would not impair implementation of or physically interfere with an adopted Dam Evacuation Plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The GPU would result in land uses that allow residential, commercial, and industrial development in areas that are prone to wildland fires due to the fact that the majority of the unincorporated County is located in High or Very High fire threat hazard areas. Impacts were found to potentially significant, and mitigation was required.

Mitigation measures Haz-4.1 through Haz-4.4 were identified to reduce impacts. These mitigation measures require identifying and minimizing potential fire hazards by using and

maintaining a database that identifies fire prone areas and adhering to the County Guidelines for Determining Significant for Wildland Fires & Fire Protection, conducting effective and environmentally sensitive brush management measures, enforcing and complying with Building and Fire Code to ensure there are adequate fire service levels and implement General Plan Regional Category map and Land Use Maps, and creating a Conservation Subdivision Program that facilitate conversation oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations. Implementation of these mitigation measures were found to reduce the impacts to wildland fire hazards; however, not to below a level of significance.

Project

The project site is not located within an area designated as a Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Protection. The analysis of the project site and its fire environment found that the project site in its current undeveloped condition, is considered to include characteristics that, under favorable conditions, have the potential to facilitate fire spread. Once the project is constructed, the on-site fire potential would be lower than the current condition due to conversion of areas of wildland fuels to managed landscapes or paved areas and improved accessibility to firefighting personnel and equipment. It is not anticipated that fire has the potential to encroach upon the project site and subject the structures to wildfire, given the project does not have an interface with wildland.

The project site is within the San Diego County Fire Protection District's (SDCFPD) jurisdictional area. The SDCFPD operates at least two fire stations that could respond to an incident on the site in under ten minutes travel time, one of which could reach the site in under two minutes total response time (SDCFPD Station 80). In addition, automatic/mutual aid agreements are in place with neighboring fire agencies to augment response. The closest existing fire station to the project site is the SDCFPD Station 80, located at 829 San Vicente Road, Ramona, California, approximately 0.3 miles from the primary access to the development. SDCFPD Station 80 includes one (1) Type 1 Fire Engine that is staffed daily by five (5) personnel, and one (1) ALS Ambulance.

The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of fire safety standards would occur during the building permit process and is consistent with GPU mitigation measure Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the land use intensity established under the GPU with the use of the State Density Bonus. Therefore, for the reasons stated above, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Moreover, the project would 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.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. As the project would have a less-than-significant impact with consistency to mitigation measure Haz-4.3, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The GPU would be required to comply with existing regulations and processes associated with vector control and would, therefore, not create a significant hazard to the public or the environment by substantially increasing human exposure. Impacts were found to be less than significant.

Project

The project does not involve, or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve, or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural animal operations (chicken coops, dairies, etc.), solid waste facilities, or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. The proposed project would have a less-than-significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3).

	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?	☐	☐	☐
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?	☐	☐	☐
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	☐	☐	☐
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume 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 of planned uses for which permits have been granted?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	☐	☐	☐
h) Provide substantial additional sources of polluted runoff?	☐	☐	☐
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?

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

☐ ☐ ☐

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

☐ ☐ ☐

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

☐ ☐ ☐

m) Inundation by seiche, tsunami, or mudflow?

☐ ☐ ☐

Discussion

The following technical studies were prepared for the project related to hydrology and water quality:

Preliminary Drainage Report, prepared by C & V Consulting, Inc., dated October 2026.

County of San Diego Stormwater Quality Management Plan (SWQMP) for Priority Development Projects (PDPs), prepared by C & V consulting, dated October 2, 2026.

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that development of future land uses proposed within the GPU would contribute pollutants such as sediments, hydrocarbons, and paints in quantities that would otherwise significantly degrade surface water quality. Non-point source pollutants that would degrade surface water quality could result in potentially significant impacts to water quality in groundwater dependent areas that were experiencing groundwater contamination, exacerbating groundwater quality impacts. Therefore, it was concluded that the GPU would result in a potentially significant impact to water quality standards.

Mitigation measures Hyd-1.1 through Hyd-1.10 were identified to minimize impacts. These mitigation measures include update of the County of San Diego's Jurisdictional Urban Runoff Management Program; implementation and revision of Watershed Protection Ordinance; establishment and implementation of LID standards for new development; revision and implementation the Stormwater Standards Manual; utilization the County Guidelines for Determining Significant for Surface Water Quality, Hydrology, and Groundwater Resources; implementation and revision of Board Policy I-84 requiring discretionary project applications include commitment from available water and sanitation districts; assurance of County planning staff participation in review of wastewater facility improvement plans; allowance of wastewater facilities contingent upon approval of Major Use Permit to ensure facilities are adequately sized; review of septic system design, construction, and maintenance in cooperation with the Regional Water Quality Control

Board; and coordination with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative on-site Wastewater treatment systems. However, even with implementation of these mitigation measures, impacts would remain significant and unmitigated.

Project

Development projects have the potential to generate pollutants during both the construction and operational phases. During the construction phase the project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include the following erosion control BMPs: hydraulic stabilization hydroseeding; County Standard lot perimeter protection detail; silt fencing, gravel and sand bags, and storm drain inlet protection for sediment control; stabilized construction entrance, construction road stabilization, entrance/exit tire wash, entrance/exit inspection & cleaning facility, and street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction general Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the Storm Water Quality Management Plan (SWQMP), the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. BMPs would include hydraulic stabilization hydroseeding, County standard lot perimeter protection detail, use of silt fencing, fiber rolls, gravel and sandbags, and storm drain inlet protection for sediment control, stabilized construction entrance, construction road stabilization, entrance/exist tire wash, street sweeping and vacuuming, materials management, and waste management. The SWQMP prepared for the project was prepared in accordance with the County of San Diego BMP design manual (2019) and the Municipal Desperate Storm Sewer System (MS4) permit.

The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. As the project would have a less-than-significant impact to water quality as detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. Over 70 water bodies located within both incorporated and unincorporated San Diego County are in violation of water quality standards. Generally, pollutants of concern were found to include elevated coliform bacteria levels, elevated levels of iron, manganese, phosphorus, nitrogen, total dissolved solids, and various other pollutants. The GPU EIR found that implementation of the GPU would result in development that would contribute both point and non-point source pollutants to surface water bodies. The GPU would allow land uses and development that would contribute additional point and non-point source pollutants within watershed management areas (WMAs) that are in violation of water quality requirements. Impacts would be significant, and mitigation was required. Mitigation measures Hyd-1.1 through Hyd-1.9 described above were identified to minimize impacts. However, impacts were found to remain significant and unmitigated.

Project

The project site contains three parcels and slopes from east to west. Under existing conditions, stormwater runoff from Parcels 1 and 4 flows overland from the southeast corner to the northwest corner and into 10th Street. Runoff on Parcel 2 flows from the southeast corner to the northwest corner into San Vicente Road.

To preserve historic drainage patterns, post construction the project would be divided into two major drainage areas as the current condition discharges to two different locations (San Vicente Road and 10th Street). Runoff would be directed to the underground storm drain system until it discharges into the Santa Maria Creek which confluent with the Santa Ysabel Creek. The Santa Ysabel Creek eventually discharges into the San Dieguito River which outlets into the Pacific Ocean. The Santa Maria Creek is an earthen channel. Two 303 impaired water bodies are within the path of storm water from the project site to the Pacific Ocean, Hodges Lake and San Dieguito River. Hodges Lake identifies pollutants such as color, mercury, manganese, nitrogen, pH, phosphorus, and turbidity. San Dieguito River identifies benthic community effects, indicator bacteria, nitrogen, phosphorus, total dissolved solids, and toxicity as pollutants with indicator bacteria and the highest priority pollutant.

The project could contribute to release of these pollutants. However, the project would implement site design measures, source control BMPs, and structural BMPs and would not result in a significant increase of pollutants to receiving waters. Storm water runoff would be collected on-site, treated by a proprietary biofiltration system, and stored in the underground system. Discharge from the system would be metered by a stormwater sump pump and a parkway drain. The project would not result in an increase in any pollutant for which the water body is already impaired.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less-than-significant impact. Therefore, the project would be consistent with the analysis within the

GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR determined that the GPU would result in potentially significant impacts to water quality from proposing land uses in groundwater dependent areas that were experiencing groundwater contamination. Groundwater that has contaminants that exceed the Federal and State primary maximum contaminant levels (MCLs) is not considered potable. Impacts were found to be significant and mitigation measures were required. Mitigation measures Hyd-1.4 and Hyd-1.5 were identified to minimize impacts. While mitigation measures were introduced to minimize impacts, it was found that impacts would remain significant and unavoidable.

Project

As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies. The proposed project would have a less-than significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. Maximum build-out of the GPU would result in groundwater supply impacts in areas that experience a 50 percent reduction of groundwater in storage, areas that were at the time impacted by the combined drawdown of existing wells, areas that experience a high frequency of low well yield, and Borrego Valley. Potentially significant impacts to groundwater resources were found to occur and mitigation measures were required.

In addition to mitigation measures Hyd-1.1 through Hyd-1.5, described above, mitigation measures Hyd-2.1 through Hyd-2.5 were introduced to reduce impacts. These mitigation measures include implementing Board Policy I-84 and Board Policy G-15, implementing Groundwater Ordinance and revising Ordinance Relating to Water Conservation for Landscaping, establishing water credits program between the County and Borrego Water District to provide a streamlined and consistent process, coordinating with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation, and implementing and revising, as necessary, the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains/Floodways to restrict development in floodplains/floodways. However, even with implementation of these measures, impacts were found to remain significant and unavoidable.

Project

The project is within the service area of the Ramona Municipal Water District that obtains water from the San Diego County Water Authority, which imports water through the Metropolitan Water District of Southern California (MWD). MWD obtains its water from two sources, the Colorado River and the State Water Project. The project would not use groundwater for its potable water supply. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. As the project would have a less-than-significant impact to groundwater recharge, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that the future land uses as designated in the GPU had the potential to result in the alteration of drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Specific mitigation measures were identified to reduce the potentially significant impact associated with excessive erosion and siltation to below a level of significance.

In addition to mitigation measures Hyd-1.2, Hyd-1.3, and Hyd-1.5 (described above), mitigation measures Hyd-3.1 through Hyd-3.3 were identified to minimize impacts. These mitigation measures include requirements to implement and revise ordinances to require new development to be located down and away from ridgelines; to conform to natural topography; to not significantly alter dominant physical characteristic; to maximize natural drainage; to implement and revise the RPO and incorporate Board Policy I-73, the Hillside Development Policy; and to implement Grading, Clearing, and Watercourses Ordinance to protect development sites against erosion and instability. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The project would not result in substantial erosion or siltation on or off-site. Storm water quality management plans have been prepared for both the construction and post-construction phases of the development project. During the construction phase, the project would be required to prepare a SWPPP. The SWPPP would include the following erosion control BMPs: hydraulic stabilization hydroseeding; County Standard lot perimeter protection detail; silt fencing, gravel and sand bags, and storm drain inlet protection for sediment control; stabilized construction entrance, construction road stabilization, entrance/exit tire wash, entrance/exit inspection & cleaning facility, and street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009.

During the post-construction phase, as outlined in the SWQMP, the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP prepared for the project was prepared in accordance with the County of San Diego BMP design manual (2019) and the MS4 permit.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed.

Under existing conditions, the site has been divided into four major drainage areas, X1, X2, X3, and X4. Drainage Area X1 is located on the southeast end of the site and slopes from the northeast to the southwest. Runoff is directed overland from the property line along 9th Street to the property line along 10th Street. Drainage Area X2 consists of the northern portion of the site and slopes from the southeast to the northwest, directing runoff from the property line along 9th Street towards the unpaved portion of 10th Street. Runoff in drainage area X3 is conveyed overland from the east to the west. The offsite run on from 9th Street has been quantified and analyzed in the existing condition as its own drainage area, X4. Runoff from drainage areas X1, X2, and X3 generally flows overland from 9th Street to the existing catch basin at San Vicente Road and 11th Street.

Post construction residential development would be divided into six main drainage management areas (each with an initial subarea) which would be graded to match the existing drainage condition to the maximum extent possible. Proposed grading has been designed to limit retaining walls and to preserve the overall grades of the site.

Development of the project would result in an increase in runoff from a 100-year storm event by 61.7 percent. The increase in peak flow rate would be caused by the increase in impervious area and change in land use from the existing condition. The on-site detention system is sized to manage the increase in peak flow rate for the two, 10, and 100-year storm events, adhering to both San Diego County Hydrology and Hydromodification Control Requirements.

Post construction, stormwater runoff onsite would be conveyed via curb and gutter into proposed curb inlet catch basins and grated inlet catch basins that would route low flows into adjacent Modular Wetland (MWS) units for water quality treatment. MWS units are proprietary flow thru biofiltration vaults. When the water quality treatment flowrate is exceeded, runoff would bypass treatment within the MWS units and be conveyed into the underground storm drain detention system. The underground detention system would be sized to mitigate for hydromodification requirements and the 100-year storm event peak flow rate.

Although the historic and existing pattern of runoff from the site would be slightly altered by the project, the proposed development would improve the existing drainage patterns and adequately manage increase in peak flows. Therefore, the proposed project would not result in the flooding or other negative impacts to facilities downstream. Onsite landscaping included as part of the project would also prevent erosion and/or siltation onsite. Impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the project would have a less-than-significant impact to erosion or siltation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. Development of future land uses designated in the GPU has the potential to result in substantial alteration of existing drainage patterns and increase the rate or amount of surface runoff resulting in flooding on or offsite. Therefore, it was concluded that impacts associated with flooding were potentially significant.

Mitigation measures Hyd-1.1 through Hyd-1.5 and Hyd-2.5 (described above) were found to be applicable to this issue and were incorporated. In addition, mitigation measures Hyd-4.1 through Hyd-4.3 were identified to minimize impacts. These mitigation measures require implementation of the Flood Damage Prevention Ordinance, Grading Clearing and Watercourse Ordinance, and implementation and revision of necessary Board Policies. Implementation of these mitigation measures was found to reduce impacts to below a level of significance.

Project

The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. There are no rivers or streams located on the project site.

The project proposes grading to include approximately 176,831 cubic yards of cut and 60,900 cubic yards of fill. The project site is moderately sloped, and project grading would not create slopes on the project site. As discussed in 10 (e), the project would slightly alter the existing drainage patterns and would result in an increase in impervious area that result in an increase of peak flow rates. However, the existing drainage boundaries and discharges would remain at the same historical locations, ensuring no diversion of flow to adjacent properties as all onsite flows would be kept onsite and conveyed through the proposed underground storm drain system to the point of discharge. The project would not involve the alteration of any natural stream or river course. The existing headwall would be protected in place, with added erosion protection (concrete apron) to maintain headwall integrity.

Although the project introduces new impervious surfaces, on-site detention systems have been sized to attenuate peak flow rates for the 100-year storm event (as well as the two-through 10-year storm events per hydromodification requirements) to pre-development levels. This ensures that the rate and amount of surface runoff would not increase in a manner that would result in on- or off-site flooding. The project design adheres to the San Diego County Manual and the San Diego County Hydromodification requirements, specifically managing flow duration to prevent downstream erosion and flooding. Therefore, the project would have a less than significant impact on existing drainage patterns and would not result in flooding on- or off-site the onsite detention system would be designed for the increase in peak flow rate and would result in decreased peak flow rates in the developed conditions. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The project would have a less-than-significant impact with regards to flooding. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified in the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that the GPU had the potential to contribute to run-off in a manner that would exceed existing stormwater drainage facilities. Impacts would be significant, and mitigation was required.

Mitigation measures Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3, as described above, were found to be applicable to this issue of stormwater systems and were incorporated. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The project is proposing the construction of a single-family residential development consisting of 88 single-family homes. The project would increase impervious surfaces on the project site and would result in an increase in runoff for the 100-year storm event from 39.36 to 63.66 cfs. Post construction, stormwater runoff onsite would be conveyed via curb and gutter into proposed curb inlet catch basins and grated inlet catch basins that would route low flows into adjacent MWS units for water quality treatment. When the water quality treatment flowrate is exceeded, runoff bypasses treatment within the MWS units and would be conveyed into the underground storm drain detention system. The detention system is sized to meet hydromodification requirements and the 100-year storm event peak flow rate. Therefore, the project would detain stormwater on-site and would not increase peak flows. Post development drainage would be at or below pre-development rates of discharge with implementation of design features and improvements consistent

with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. The proposed project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would result in land uses and development that would increase the amount of impermeable surfaces throughout the County and potentially result in an excess of polluted runoff that would exceed the capacity of existing drainage facilities. Impacts would be significant, and mitigation was required.

Mitigation measures Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3, as described above, were found to be applicable to this issue of stormwater systems and were incorporated. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. The project would have a less-than-significant impact to water quality standards. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would result in the placement of housing within flood hazard areas. Impacts were found to be significant, and mitigation was required.

Mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, and Hyd-4.2, described above, were found to be applicable to this issue and were incorporated. In addition, mitigation measure Hyd-6.1 was identified. This mitigation measures required implementing the RPO to prohibit development of permanent structures for human habitation or employment in a floodway.

Project

Review of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) and San Diego County Floodplain Maps, show that the project site and surrounding area is located within Zone X, which is defined as an area of minimal flood hazard outside the one percent annual chance (100-year) floodplain. All runoff would be mitigated on-site and discharged at or below the existing condition flow rates. In addition, all habitable structures would be constructed with finished floor elevations that provide a minimum of one foot of freeboard above the adjacent natural grade or calculated water surface elevation to provide an extra margin of safety. The project site is not located within a County mapped floodway or County mapped floodplain. Therefore, the project would not place housing within 100-year flood hazard area which would impede or redirect flood flows. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that the GPU proposed village residential, village core mixed use, neighborhood commercial, general commercial, limited impact industrial, medium impact industrial, and high impact industrial land uses in areas located within a floodplain or floodplain fringe and that these land uses have the potential to contain structures that would impede or redirect flood flows. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1, described above, were found to be applicable to the issue of impeding or redirecting flood flows and were incorporated. Incorporation of these mitigation measures were found to reduce impacts to less than significant.

Project

The proposed project would not place structures within a 100-year flood hazard area in a manner that would impede or redirect flood flows. All parts of the proposed development, including habitable buildings and secondary structures, are located outside of mapped 100-year floodplains as delineated on FEMA FIRMs and County Floodplain Maps. By utilizing on-site detention systems sized for the 100-year storm, the project ensures that the velocity and volume of discharge would not cause downstream backwater effects or flow redirection. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from structures within a 100-year flood hazard area as 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would result in the potential to expose people or structure to a significant risk of loss, injury or death involving flooding by placing persons or housing in areas subject to flooding risks. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1, as described above, were found to be applicable to this issue and were incorporated. In addition, mitigation measures Hyd-8.1 and Hyd-8.2 were identified to minimize impacts. These mitigation measures required the performance of regular inspections and maintenance of County reservoirs to prevent dam failure and the review of discretionary projects for dam inundation hazards through the application of the County's Guidelines for Determining Significance for Emergency Response Plans. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The project does not propose development within any identified special flood hazard area. The project site is not identified on any FEMA or County-mapped floodplains and is not located within a flood hazard area. The project would not expose people or structures to a significant risk of loss, injury, or death involving flooding. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would result in the potential to expose people or structure to a significant risk of loss, injury or death involving flooding as a result of levee or dam failure by placing persons or housing in areas subject to flooding risks. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1, as described above, were found to be applicable to this issue and were incorporated. In addition, mitigation measures Hyd-8.1 and Hyd-8.2 were identified to minimize impacts. These mitigation measures required the performance of regular inspections and maintenance of County reservoirs to prevent dam failure and the review of discretionary

projects for dam inundation hazards through the application of the County's Guidelines for Determining Significance for Emergency Response Plans. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding due to the failure of a levee or dam. The project site is not located within a designated dam inundation zone or near any known levee systems. The site's location and elevation are outside the historical inundation areas of regional dams, such as Sutherland Reservoir or Lake Ramona, which are the primary large-scale water storage facilities in the greater Ramona area. The site is situated at an elevation and location that would place it outside the predicted path of floodwaters for both extremely high and high-hazard dams monitored by the California Division of Safety of Dams. According to the San Diego County Dam Inundation Map, the subject property is not encumbered by any inundation boundaries that would require specialized evacuation planning or structural mitigation. The project site is not located within or near a dam inundation area. Therefore, the project would not 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. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

10(m)(i) SEICHE:

The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would not result in land uses or development within areas subject to inundation from a seiche. Therefore, this was not considered a significant impact.

Project

The project site is not located along the shoreline of a lake or reservoir. The project site is not located within an area subject to inundation from a seiche. Impacts would be less than significant.

10(m)(ii) TSUNAMI:

The GPU EIR found that, due to the inland location of the unincorporated County and the history of minor tsunami events, implementation of the GPU would not expose people or structures to hazards associated with inundation by a tsunami. Therefore, impacts associated with a tsunami were found to be less than significant.

Project

The project site is not located in a tsunami hazard zone. The project site is located inland approximately 30 miles east of the Pacific Ocean at an elevation of approximately 1,511 feet above mean sea level. Considering the inland location and elevation of the project site, the project would not expose people or structures to hazards associated with inundation by a tsunami. Impacts would be less than significant.

10(m)(iii) MUDFLOW:

The GPU EIR concluded that the GPU would locate land uses and development in areas that would be considered susceptible to mudflow. Therefore, this was considered a significant impact and mitigation was required. Mitigation measures Hyd-3.1, Hyd-3.2, and Hyd-3.3, as described above, were found to be applicable to the issue of seiche, tsunami, and mudflow hazards and were incorporated. Incorporation of these mitigation measures were found to reduce impacts to less than significant.

Project

Mudflow is type of landslide. See response to question 7(a)(iv). The project would not expose people or structures to a hazard associated with inundation by a mudflow. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the project. The mitigation measures, as detailed above, requires the project applicant to comply with the guidelines for determining significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

	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?	☐	☐	☐
b) Conflict with an 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?	☐	☐	☐

Discussion

- 11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that the GPU had the potential to result in the division of an established community through the development of new roadways and result in potentially significant impacts.

Mitigation measures Lan-1.1 through Lan-1.3 were identified. These mitigation measures included requirements to coordinate with adjacent cities and other agencies regarding planning efforts and resource protection, to ensure both public and private development projects and associated infrastructure minimize impacts to established communities, and to maintain plans and standards for infrastructure and roads to that divisions of communities do not occur. Implementation of these mitigation measures were found to mitigate impacts associated with proposed new, extended, or widened roadways that would physically divide an established community to below a level of significance.

Project

The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The project is for 88 single-family residences. The project is consistent with Village Residential designation and is consistent with the County Zoning Ordinance Land Use Regulation and density established under the County of San Diego General Plan. Surrounding land uses are predominantly residential. The project does not propose any development that would be expected to divide the surrounding established community.

As previously discussed, the GPU EIR concluded relative to physically dividing an established community that the GPU would result in an impact that is less than significant with mitigation. The project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The GPU was found to not conflict with applicable land use plans, policies, and regulations, including the RCP, RTP, CMP, Basin Plan, ALUCPs, RAQS, CTP, SOI, community plans, Zoning Ordinance, and specific plans. Impacts associated with conflicts with applicable land use plan, policies, or regulations were found to be less than significant.

Project

The project proposes development of 88 single-family residences across two zoning designations. Approximately 2.64 acres of the site are zoned VR-7.3 which allows for 7.3 dwelling units per acres. Within this area 16 units are proposed at a density of 6.06 dwelling units per acres. The remaining 17.02 acres are zoned VR-2, which allows for two dwelling units per acre. In this area, 72 units are proposed at density of 4.23 dwelling units per acre. This density is achieved through the use of the State Density Bonus Law and AB 1287. The project includes a commitment to provide eight units (15 percent of the project's development intensity) for very low-income families and three units (five percent) of the project's development intensity for moderate income families, which qualifies the project for both an initial and additional density bonus. The resulting unit count in the VR-2 zone reflects a base density of 35 units plus 26 bonus units for very low-income housing and 11 bonus units for moderate-income housing. Therefore, because the project is eligible for a density bonus, which is assumed in the County's Zoning Ordinance, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.

3. No substantial new information has been identified that results in an impact that 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
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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?

☐
☐
☐

b) Result in the loss of availability of a locally-important mineral resources recovery site delineated on a local general plan, specific plan or other land use plan?

☐
☐
☐

Discussion

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The GPU proposes land uses in areas designated as Mineral Resource Zone (MRZ)-2 and MRZ-3 or those areas underlain by Quaternary alluvium that would be incompatible with these resources. The loss of availability of known or suspected mineral resources that would be of value to the region and residents of the State could result. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measures Min-1.1, Min-1.2, and Min-1.3 were identified to minimize impacts. These mitigation measures include assessing the impact of new development in mineral resources as required by the County Guidelines for Determining Significance for Mineral Resources, revising and updating the County ordinances to designate areas of known importance for mineral resources, and requesting the that the State Geologist mineral resources in previously unmapped areas of East and North County. However, even with implementation of these mitigation measures, it was found that continued development and growth under the GPU would occur in areas that are known or likely to contain mineral resources, such as MRZ-2, MRZ-3, and areas underlain by Quaternary alluvium. Additional mitigation measures were considered to reduce impacts associated with mineral resources to below a level of significant; however, the County determined that they were infeasible as they would conflict with the goal of the Housing Element to provide sufficient housing stock and would not minimize public costs and infrastructure. Impacts were found to be significant and unavoidable.

Project

The California Surface Mining and Reclamation Act (SMARA) required classification of land into MRZs. According to the County of San Diego Guideline for Determining Significance for Mineral Resources, the project site is classified as being within MRZ 3 Resources Potentially Present. MRZ-3 areas contain known mineral deposits that could qualify as mineral resources. However, the project site has been previously disturbed and contains an existing single-family residence and barn. In addition, the project site has no alluvium or mines and is surrounded by residential development and a school nearby. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to already developed land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. GPU includes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Min-1.1 through Min-1.3 were found to also reduce impacts associated with the reasonably foreseeable loss of mineral resource recovery sites, although not to below a level of significance, for the same reasons as are identified in section 12(a) above. In addition, the infeasible mitigation measures identified in 12 (a) would also reduce impacts to the loss of mineral resource recovery sites to below a level of significance; however, they were also found to be infeasible by the County and would not be implemented. Therefore, impacts were found to be significant and unavoidable.

Project

The project site is located in an area that is known or likely to contain mineral resources, MRZ- 3. There are no active mines located in the project area. Therefore, no potentially significant loss of availability of a known mineral resource or locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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
13. 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?	☐	☐	☐
b) Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels?	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
d) A substantial temporary permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
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 are to excessive noise levels?	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project are to excessive noise levels?	☐	☐	☐

Discussion

The following Technical Study was prepared for the project related to noise:

Noise Impact Study, prepared by MD Acoustics, LLC, dated June 9, 2026.

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would have the potential to expose noise sensitive land uses to excessive noise levels near

roadways or railroads. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measures Noi-1.1 through Noi-1.9 were identified to minimize impacts. These mitigation measures included the requirement for an acoustical analysis for new development that may result in existing or future noise sensitive land uses to on-site noise levels of 60 A-weighted decibel (dBA) or greater; revision of the Guidelines for Determining Significance for new development where exterior noise levels on patios or balconies exceeds 65 dBA; requirement for acoustical study for project proposed amendments to County General Plan Land use Element and/or Mobility Element; revision of the Guidelines for Determining Significance standard mitigation and project design considerations; coordination with Caltrans and SANDAG, MTS, and California High-Speed Rail Authority, as appropriate; work with project applicants during scoping phase of projects to consider impacts to sensitive land uses located outside the County's jurisdiction; implementation and/or establishment of procedures with Caltrans and the City of San Diego to ensure public participation forum is available for affected community; and coordination with Caltrans and the DPLU Landscape Architect and receive input from community representative as appropriate. Implementation of these mitigation measures were found to reduce impacts to below a level of significance.

Project

The project involves construction of a single-family residential development of 88 single-family homes. In accordance with GPU EIR mitigation measure Noi-1.1, an acoustical analysis (*Noise Impact Study*) was conducted to ensure the project meets the County's acceptable standards of the County Noise Element.

Construction Noise

Construction of the project would have the potential to result in temporary noise level increases as a result of operation of heavy equipment. The primary noise source from project construction would be from site preparation and building construction. Construction would include the use of heavy equipment such as bulldozers, loaders, scrapers, backhoes, graders, tractors, haul trucks, cranes, and miscellaneous trucks. Construction equipment noise would be considered significant if it exceeds an 8-hour average exterior noise level of 75 dBA or a maximum impulsive noise level of 82 dBA at an any adjacent property. Construction activities would take place across the project site within the allowable hours of 7 a.m. and 7 p.m.; thus, noise exposure at individual residences would vary.

Typical operating cycles for construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. A likely worst-case construction noise scenario assumes equipment operating as close as 30 feet and an average of 400 feet from the nearest sensitive receptor, the residences to the north of the project site (840 San Vicente Road). Construction noise from the project would reach up to 64 dBA during. Thus, construction noise would not exceed 75 dBA Leq (8-hour) as

required by County Noise Ordinance. Construction noise impacts would be less than significant.

Operational Noise

Noise from operation of the project would result from stationary sources and transportation related sources.

Stational Sources

On-site stationary operational noise includes heating ventilating and air conditioning (HVAC) equipment. Each single-family home would have one five-ton HVAC unit on a concrete slab in the backyard. Each HVAC unit is assumed to operate 24 hours a day. Equipment would be an average of 400 feet away from the closest adjacent residential use to the north. The maximum sound power level from a single unit is 78 dBA. At the nearest existing residence to the north, the sound pressure level from all 88 operating HVAC units is estimated to be 45 dBA. This is a conservative estimate, as most of the HVAC units would be shielded by the project's residential buildings. Thus, the maximum HVAC sound level at the adjacent residential receivers would be up to 45 dBA Leq and not exceed the 45 dBA Leq nighttime noise limit for residential uses outlined by the San Diego County General Plan. Therefore, operational noise from the proposed HVAC systems would be less than significant.

Future On-Site Noise

The future noise level on-site of the project would be impacted by transportation-related sources, including roadway traffic from 9th Street, 10th Street, and 11th Street. The project residential unit with the loudest expected traffic noise is the residence located closest to 10th Street and 11th Street. The potential on-site exterior noise impacts caused by the vehicular traffic was calculated at this residential exterior use. The exterior noise level at the exterior use due to nearby roadway traffic is projected to be 66 dBA CNEL. This noise level falls within the "Conditionally Acceptable" range in the Land Use Compatibility table in the City's General Plan.

The project must comply with the 60 dBA community noise equivalent level (CNEL) exterior noise standard for single-family residential uses presented in Table N-2 of the San Diego County General Plan. Thus, as a condition of the project, a six-foot tall block wall would be built along the property line of the residential units closest to 10th Street and 11th Street. The exterior noise level due to 10th Street and 11th Street traffic at the nearest exterior residential use would be reduced to 60 dBA CNEL with the use of six-foot tall walls.

The future interior noise level was calculated for the on-site sensitive receptor locations using a typical "windows open" and "windows closed" condition. The interior noise level would be 48 dBA CNEL with the windows open and 40 dBA CNEL with the windows closed. The project would include a six-foot tall wall along the northern and western property lines of the 16 residential plots closest to the 10th Street and 11th Street. This project design feature would ensure that interior noise levels would meet the interior noise standard of 45

dBA CNEL per Table N-2 of the San Diego County General Plan. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to excessive noise levels as less than significant with mitigation. The project would have a less than significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that the construction of new land uses in the GPU and placement of new development in proximity to existing railroads or extraction operations would have potential to result in impacts associated with excessive groundborne vibration. Impacts were found to be significant and mitigation measures were required.

Mitigation measure Noi-1.7, described above, would be required to reduce the potential for significant impacts. In addition, mitigation measures Noi-2.1 through Noi-2.4 were identified to minimize impacts. These mitigation measures included the requirement for a groundborne vibration technical study for land uses close to Sprint Rail Line right-of-way, revision of the County CEQA determinations of significance to reflect limits in the Noise Compatibility Guidelines and Noise Standards, review of project applications for industrial facilities to ensure location in areas that would minimize impacts to noise-sensitive and uses, and a requirement for an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive and uses. Implementation of the GPU EIR mitigation measures would reduce noise impacts to below a level of significance.

Project

The project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. Construction activities can produce vibration that may be felt by adjacent land uses.

The construction of the proposed project would not require the use of equipment such as pile drivers which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a vibratory roller. A vibratory roller has a vibration impact of 0.21 inches per second peak particle velocity (PPV) at 25 feet which is perceptible but below any risk to architectural damage. The nearest building to the project is a residential building located 30 feet north of construction operations. At a distance of 30 feet, a vibratory roller would yield a worst-case 0.172 PPV (in/sec), which may be perceptible but sustainably below any risk of damage (0.3 in/sec PPV is the threshold of old residential structures). The impact is less than significant, and no mitigation is required.

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. The project would have a less than significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 13(c) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR found that traffic on new roadways or roadway improvements, as well as operation of new industrial facilities and other noise-generation uses allowed under the GPU, would result in potentially significant permanent increases in ambient noise levels. Impacts were found to be significant and mitigation measures were required.

Mitigation measures Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3 and Noi-2.4, as described above, would be required to reduce impacts. In addition, mitigation measures Noi-3.1 and Noi-3.2 were identified to minimize impacts. These mitigation measures ensure that for new County Road improvement projects either the County's Noise Standards are used to evaluate noise impacts, or the project does not exceed three decibels over existing noise levels and work with project applicant during review to determine appropriate noise reduction site design techniques. Implementation of these mitigation measures were found to reduce impacts associated with permanent increased in ambient noise level but not to below a significant level. Impacts remain significant and unavoidable.

Project

The potential off-site noise impacts caused by the increase in vehicular traffic as a result of the project were calculated at a distance of 45 feet from 9th Street, 60 feet from 10th Street, and 50 feet from 11th Street. These distances are representative of approximate distances to existing single-family homes closest to the subject roadways impacted by the project. Table 1, *Change in Noise Levels as a Result of Project*, shows the change in noise levels from existing without project to existing with project.

Table 1, Change in Noise Levels as a Result of Project

Roadway ¹	Segment	CNEL from C/L to Existing Residences dBA ²			
		Existing Without Project	Existing With Project	Change in Noise Level	Potential Significant Impact
9 th Street	South of Main St	52.3	54.0	1.7	No
10 th Street	South of Main St	64.7	64.8	0.1	
11 th Street	South of Main St	62.1	62.1	0.0	

Notes: 1 Exterior noise levels calculated at five feet above ground level.

2 Noise levels calculated from centerline of subject roadway to existing residences.

As shown in Table 1, the addition of the project would cause a 0.1 to 1.7 dBA increase in traffic noise at the nearest residences from the centerlines of the three subject roadways. The increase in dBA would be inaudible and therefore the impact is less than significant, and no mitigation is required.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. The project would have a less than significant impact for the reasons detailed above. The project would have a less than significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. Future development under the GPU has the potential to result in temporary increase in ambient noise levels due to construction of new land uses and infrastructure, as well as an increase in nuisance noise in areas where development would be intensified. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measures Noi-4.1 and Noi-4.2 were identified to reduce impacts. These mitigation measures require the periodic review and revision of the Noise Ordinance and Section 6300 of the Zoning Ordinance, as necessary, and augment staff and equipment, as appropriate, to facilitate enforcement of the Noise Ordinance. Implementation of these mitigation measures was found to reduce impacts to below a level of significance.

Project

The project would not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Construction noise would be subject to the County's 75 dBA eight-hour average requirement between 7:00 a.m. and 7:00 p.m. at the boundary of the project site. Construction would occur during the hours proscribed by the County noise ordinance. Construction noise levels at the project property lines would not exceed 64 dBA Leq (eight-hours). The project would not result in substantial temporary or periodic increase in ambient noise levels. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. As the project would have a less than significant impact, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU includes land use designations that would locate noise sensitive land uses near a public airstrip, which would result in the exposure of persons to excessive noise levels. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measure Noi-5.1, which requires use of applicable Airport Land Use Compatibility Plan's as guidance/reference during development review of projects that are planned within an Airport Influence Area, would apply. Implementation of this mitigation measure would reduce impacts to below a level of significance.

Project

The project site is located approximately 3.5 miles east of the Ramona Airport and is within the ALUCP for the Ramona Airport. However, the project would incorporate GPU Mitigation Measure Noi-5.1 and would use the applicable Airport Land Use Compatibility Plan as guidance/reference during development review. The project site is outside the noise contour for Ramona Airport. As such, the project would not exposed people residing or working in the project area to excessive noise levels. Impacts would be less than significant.

Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than what is identified in the GPU EIR.

- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU includes land use designations that would potentially result in the development of noise sensitive land uses near a private airstrip that would result in the exposure of persons to excessive noise levels. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measures Noi-5.2 and Noi-5.3 were identified to reduce impacts. These mitigation measures require the evaluation of noise exposure impacts related to a private airport or heliport use or consistency with the FAA standards and consultation with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads. Implementation of these mitigation measures were found to reduce impacts to below a level of significance.

Project

The project site is not located within a one-mile vicinity of a private airstrip. No impacts would occur. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures (Noi-1.1 and Noi-5.1) contained within the GPU EIR would be applied to the project.

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

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The GPU would directly and indirectly induce population growth; however, the growth was found to be consistent with forecasted growth in unincorporated San Diego County. The GPU is a comprehensive plan that guides future growth and includes a framework for land use and development, as well as goals and policies, to prevent unanticipated or inappropriate population growth in the unincorporated County. Therefore, impacts were found to be less than significant.

Project

The project site is designated in the General Plan as Village Residential (VR-2 and VR-7.3). The project is proposing the construction of 88 single-family homes across two neighborhoods. The project would utilize the State Density Bonus Law and AB 1287 to provide eight units (15 percent of the project's development intensity) for very low-income families and three units (five percent) of the project's development intensity for moderate income families, which qualifies the project for both an initial and additional density bonus. Since the density bonus utilized by the project is assumed in the County's Zoning Ordinance, the project is consistent with the density allowable under the General Plan. Therefore, the project would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 14(b) The GPU EIR concluded this impact to be less than significant. The GPU would not result in displacing substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Project

The existing conditions of the project site include a single-family residence, barn, and four ancillary structures. The project proposes demolition of the barn; the single-family residence and four ancillary structures would remain. Furthermore, the single-family residence and its immediate surroundings would be subdivided from the remainder of the project into a separate parcel. The project does not propose the demolition of any residential structures and thus would not displace substantial numbers of existing housing. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 14(c) The GPU EIR concluded this impact to be less than significant. The GPU would not result in displacing substantial numbers of people necessitating the construction of replacement housing elsewhere. Impacts were found to be less than significant.

Project

As discussed above under 14(b), the project does not propose the demolition of any residential structures and thus would not displace substantial numbers of people. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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
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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) The GPU EIR concluded this impact to be less than significant with mitigation except for school services, which remained significant and unavoidable. The GPU includes land use designations that would increase population and housing within the unincorporated County, which was found to increase the demand for fire protection, police protection schools, parks, and library services.

Mitigation measures Pub-1.1 through Pub-1.9 and Pub-3.1 and Pub-3.2 were identified to minimize impacts. These mitigation measures include participation in interjurisdictional reviews; plan and site governmental facilities according to their location in village, semi-rural, or rural lands; review of General Plan Amendments for consistent with goals and policies such that development in hazardous wildfire areas will be limited to low-density uses; maintain and use the County GIS and the County Guidelines for Determining Significant impacts to identify fire prone areas during review of development projects; implement the Building and Fire code to ensure adequate fire protection in place; require CEQA review on new public facilities; and implement procedures to ensure new development projects fund their fair share toward fire services facilities. MM Pub-3.1 and Pub-3.2 include coordination with school districts to encourage siting new facilities in accordance with the County's General Plan and implement and revise as necessary, and Board Policy I-84 requiring that discretionary project applications include commitments from available school districts. These mitigation measures would reduce impacts to less than significant for all areas except for school services. The County does not have the authority to plan, design, approve, or construct school facilities and it is up to the individual school districts. Due to the County's limited authority over the construction or expansion of school facilities, the County would not be able to ensure that the construction of new facilities would have a less than significant impact on the environment. This impact would remain significant and unavoidable.

Project

The project involves construction of 88 single family homes. 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.

The project site is located within San Diego County Fire Protection District, which has sufficient capacity to serve the project. The nearest fire station is the Ramon Station 80, located at 829 San Vicente Road Ramon, CA 92065 approximately 0.3 miles west of the project site.

Police projection would be provided by the San Diego Sheriff's Department (SDSD). The project site is serviced by the Ramona Substation located at 1424 Montecito Road approximately one mile west of the project site. The project would not result in an increase of population and but would not create housing growth that would result in the need for increased law enforcement services. The Ramona Sheriff's substation is staffed by three professional staff personnel, a part-time Crime Analyst, a full-time Crime Prevention Specialist, 20 Deputies, five Sergeants, and a Lieutenant. The substation also had a dedicated team of 25 Volunteer Sheriff's Patrol Member and 13 Mounted Patrol Volunteers. The SDSD has sufficient capacity to serve the project.

School service for the area is provided by the Ramona Unified School District. The project would be served the Ramon Elementary School, Olive Peirce Middle School, and Ramona High School. Per the County's Project Facility Availability form prepared for the project, the additional student population from the proposed project would result in the overcrowding of Ramona Elementary School. The project would levy fees, or land would be dedicated in accordance with Education Code Section 17620 prior to the issuance of building permits. The project would not result in overcrowding for the middle of high school.

The project is subject to the County's Park Lands Dedication Ordinance (PLDO). Consistent with Density Bonus Law and the project's affordable housing commitments, the applicant proposes to pay in-lieu park fees rather than dedicate on-site parkland. Payment of in-lieu fees would allow park funding to be allocated toward improvements at existing park facilities serving the Ramona community.

Therefore, the project would 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. Based on the project's service availability forms, and the discussion above, the project would not result in the need for significantly altered services or facilities.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. The project would have a less-than-

significant impact for the reasons stated above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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 GPU EIR concluded this impact to be less than significant with mitigation. Increases in population as a result of the GPU was found to result in increased use of recreational facilities and forecasted increase in population in areas that currently do not have an abundance of local recreational facilities would have the potential to accelerate the deterioration of existing facilities. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Rec-1.1 through Rec-1.11 were identified to minimize impacts. These mitigation measures include implementing Board Policy I-44 to identify park and recreation

needs and priorities for communities; coordinating with communities, agencies, and organization to identify and develop park and recreation needs; preparing of a design manual to provide concepts for park and recreation facilities components; participating in discretionary project review of residential project with 50 or more units to identify park facility needs and attain funding for land acquisition and construction of recreational facilities by implementing the PLDO; soliciting grants and bonds to fund operation and maintenance; and forming Landscape Improvement Districts and County Service Areas. These measures also included to acquire trail routes across private lands through direct purchase or other means from a willing owner/seller, to prioritize the acquisition and development of trail segments in a manner to provide maximum environmental and public benefit, to implement and revise as necessary the Regional Trails Plan and Community Trails Master Plan, to consult with tribal councils to facilitate trail connections through tribal land, to develop procedures to coordinate the operation and maintenance or pathways for adjacent roads, and to prioritize open space acquisition needs through coordination with government agencies and private organizations. Implementation of these mitigation measures were found to reduce impacts to below a level of significance.

Project

The project would increase the use of existing parks and other recreational facilities as it is introducing 88 single-family homes and an increase in population. The project is proposing three parks within the project site that would be privately maintained. These parks are not County recreational facilities. Park A is located on the northwest section of Neighborhood A and would include a picnic table and turf area. Park B is located in the northwest corner of Neighborhood B bordering first street. Park B would include a picnic area, bench seating, and sidewalk. Park C is the largest and is located off the new internal street in Neighborhood B. Park C would include barbecue, picnic table, sidewalk, community garden, turf area, planting area, play surface and a playground. Additionally, the project would pay Park Land Dedication Ordinance in-lieu fees.

The project would not 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. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU does not specifically plan or site new recreational facilities. However, land uses under the GPU would allow for the development of future recreational facilities, including, parks, trails, athletic fields, and golf courses. The construction of these new recreational facilities or expansion of existing facilities was found to have the potential to result in physical environmental effects. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Rec-1.1, Rec-1.2, Rec-1.3, Rec-1.4, Rec-1.8, Rec-1.9, and Rec-1.11, described above, were found to also mitigate impacts from the construction of new recreational facilities and were incorporated. In addition, mitigation measures Rec-2.1 through Rec-2.6 were identified to minimize impacts. These mitigation measures include updating Community Plans to address potential impacts to visual resource, community character, natural resources, cultural resources, and traffic should be new or expanded recreational facilities be needed; using community design guidelines as a resource when designing park and recreation facilities; implementing the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods to provide connections to recreation networks; developing procedure to consider designation trails that correspond to existing trails; implementing Resource Management Plans to monitor an manage preserves and trails; and developing procedures to encourage the involvement and input of agricultural community relating to trails on or adjacent to agricultural lands. Implementation of these mitigation measures were found to reduce impacts to less than significant.

Project

The project is proposing three parks within the project site that would be privately maintained. These parks are not County recreational facilities. Park A is located on the northwest section of Neighborhood A and would include a picnic table and turf area. Park B is located in the northwest corner of Neighborhood B bordering first street. Park B would include a picnic area, bench seating, and sidewalk. Park C is the largest and is located off the new internal street in Neighborhood B. Park C would include barbecue, picnic table, sidewalk, community garden, turf area, planting area, play surface and a playground. While the project would not require the construction or expansion of recreational facilities, it is proposing three private parks for its residents. Construction of these parks has been evaluated as part of the project as a whole and no significant adverse impacts were identified. Therefore, the construction or expansion of recreational facilities would not have an adverse physical effect on the environment. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact that 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

The following technical studies were prepared for the project related to traffic:

Focused Traffic Impact Study, prepared by Linscott, Law, & Greenspan, Engineer, dated December 10, 2025.

Fire Protection Plan, prepared by Dudek, dated June 2026.

- 17(a) The GPU EIR concluded this impact to be significant and unavoidable. Implementation of the GPU would result in 136 deficient roadway segments resulting in a total of 253 deficient lane miles, which would exceed the level of service (LOS) standard established by the County. Impacts were found to be potentially significant as to unincorporated traffic and LOS levels, and mitigation measures were required.

Mitigation measures Tra-1.1 through Tra-1.7 were identified to minimize impacts. These mitigation measures included the coordination with SANDAG and adjacent cities during the Regional Transportation Plan updates, coordination with Caltrans for improvement to the freeway and State Highway network, implementation of the County Public Road Standards during review of new development projects, implementation of the Congestion Management Strategies identified in the Regional Transportation Plan, development of project review procedures to require large commercial and office development to use Transportation Demand Management Programs, and implementation of the San Diego County TIF Ordinance. Implementation of these mitigation measures was found to reduce impacts associated with unincorporated County traffic and LOS standard but not to a level below significance. Other measures were considered to further reduce the 136 deficient roadway segments; however, these measures were rejected as infeasible and would not be implemented. Additional mitigation measures were determined to be infeasible as the majority of them included new or expanded road and/or intersection construction which could result in environmental impacts and/or impacts to established development. Impacts were found to be significant and unavoidable.

Project

A *Focused Traffic Impact Study* has been prepared for the project, which evaluates consistency between the proposed project and the General Plan using the LOS metric. Based on the *Focused Traffic Impact Study*, the project would generate approximately 869 Average Daily Traffic (ADT) with 64 trips during the AM peak hour (17 inbound and 47 outbound) and 85 trips during the PM peak hour (54 inbound and 31 outbound). The study area intersections and street segments were found to operate acceptably at LOS D or better during the AM and PM peak hours with the addition of project and cumulative traffic. Based on the significance criteria, no significant cumulative impacts were calculated with the addition of project traffic and cumulative projects traffic. The study area street system would continue to operate within its existing and planned capacity with the addition of the proposed project traffic. In addition, the project would be required to participate in the County's Transportation Impact Fee program since it would be tiering off the County of San Diego General Plan. Additionally, the project would implement off-site improvements to include half-width roadway improvements along 9th Street fronting the project site and approximately 1,400 square feet of frontage improvements along San Vicente Road, consistent with County standards. The project would be considered consistent with the General Plan, as the study area circulation system would continue to operate within capacity with the additional project traffic.

Therefore, the project is considered consistent with the GPU from a transportation perspective. The proposed project would not interfere with existing pedestrian, bicycle, and transit facilities surrounding the project site. No significant direct or cumulative LOS impacts would occur, and mitigation measures would not be required. Thus, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of the effectiveness for the performance of the circulation system. Impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The County standard for the LOS on Mobility Element roads is LOS D. As previously described, the study area intersections and street segments were found to operate acceptably at LOS D or better during the AM and PM peak hours with the addition of project and cumulative traffic. An objective of the GPU is to plan for growth while preserving the County's environmental, cultural, and historical resources. The project would have a less than significant impact. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. As the project would have a less-than-significant impact for reasons stated above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. Implementation of the GPU would result in 34 roadway segments in adjacent cities that would exceed the LOS standard established by the respective city. Therefore, this was found to be a significant impact and mitigation measures were required.

Mitigation measures Tra-1.1, Tra-1.2, Tra-1.3, Tra-1.4, Tra-1.5, and Tra-1.6, as described above, and mitigation measure Tra-2.1 would be required to reduce impacts. Mitigation measure Tra-2.1 establishes coordination efforts with other jurisdictions when a development project will result in a significant impact on City roads. The GPU policies and mitigation measures would not fully reduce impacts to below a level of significance due to the magnitude of the traffic impacts. Therefore, other measures that would further reduce the proposed project's significant traffic impacts were considered. However, those measures were found to be infeasible as some involve improvements to adjacent jurisdictions roadways that are outside the jurisdictions of the County. Impacts were found to remain significant and unavoidable.

Project

The GPU EIR includes policies in the Land Use and Mobility Elements that address traffic and LOS standards. The relevant policies are: LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1,

M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, limit high-traffic uses in rural and semi-rural areas, encourage uses that would reduce the frequency of employee vehicle trips, require development to mitigate the significant impacts to existing service levels of public facilities, provide for an interconnected road network, encourage alternative transportation, establish LOS criteria, and apply appropriate road standards to future development. Adherence to these policies would further reduce impacts associated with County traffic and LOS standards from future development.

General Plan Policy M-2.1 sets forth the requirements for LOS. Policy M-2.1 requires development projects to provide associated road improvements necessary to achieve a LOS D or higher on all Mobility Element roads except for those where a failing LOS has been accepted by the County pursuant to the criteria specifically identified in the General Plan. When development is proposed on roads where a failing LOS has been accepted, feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element Road network would be required.

As discussed above under 17(a), the project would generate approximately 869 Average Daily Traffic (ADT) with 64 trips during the AM peak hour (17 inbound and 47 outbound) and 85 trips during the PM peak hour (54 inbound and 31 outbound). All study area street segments and intersection would operate at a LOS D or better with the addition of project and cumulative traffic. Therefore, the project would not cause the Mobility Element roadway network to operate below the desired level of service standard (LOS D or better) established in the County's General Plan. Based on the significance criteria, no significant cumulative impacts were calculated with the addition of project traffic and cumulative projects traffic. The study area street system would continue to operate within its existing and planned capacity with the addition of the proposed project traffic.

In addition to policies in the General Plan, the GPU EIR identified mitigation measures that would partially mitigate this significant and unavoidable impact. The mitigation measures applicable to the project are as follows:

- **GPU MM Tra-1.3** is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.
- **GPU MM Tra-1.4** is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and

mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the General Plan Update.

- **GPU Tra-1.7** is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

The project will be built to public road standards (GPU MM Tra-1.3), would comply with the County Guidelines for Determining Significance for Transportation and Traffic dated August 24, 2011 (GPU MM Tra-1.4), and would pay a fair share contribution into the County's Transportation Impact Fee (TIF) Ordinance.

The project is consistent with General Plan policies for the reduction of impacts from traffic and transportation and would implement the relevant and feasible mitigation measures from the GPU EIR. Therefore, the project would result in a less than significant impact on traffic and transportation. The GPU EIR concluded this impact to be significant and unavoidable.

The Guidelines for Determining Significance Transportation and Traffic, August 24, 2011 are the applicable guidelines and standards associated with projects consistent with the General Plan. GPU EIR mitigation measure Tra-1.4 requires implementation of the Guidelines for Determining Significance for Transportation and Traffic to, in part, require mitigation when significant impacts are identified. These 2011 Guidelines ensure that General Plan-consistent projects reduce impacts and mitigate to the extent feasible providing for analysis and disclosure of impacts addressed in the GPU EIR.

Since the GPU EIR was certified, CEQA Guidelines Section 15064.3 was revised to make VMT the metric for evaluating a project's transportation impacts. In accordance with GPU EIR mitigation measure Tra-1.4, the County revised these Guidelines for Determining Significance for Transportation and Traffic to update following passage of Senate Bill 743 requiring VMT analysis under CEQA and replacing LOS as the standard. Because the GPU EIR was certified prior to passage of SB 743, the County Guidelines for Determining Significance for Transportation and Traffic applicable to General Plan-consistent projects remain the August 24, 2011, Guidelines prepared to analyze traffic and transportation and mitigate any significant effects of projects consistent with the General Plan.

CEQA 21083.3 and CEQA Guidelines Section 15183 set forth the requirements for projects that are consistent with the County General Plan. CEQA Guidelines Section 15183(a) mandates that projects which are consistent with the development density established by the General Plan policies for which the GPU EIR was certified shall not require additional environmental review, except as necessary to examine if there are any project effects that result in new or more severe impacts to traffic and transportation. Because the project is

consistent with the General Plan, and all impacts from traffic and transportation would be reduced to a level of less than significant with application of existing General Plan policies and GPU EIR mitigation measures, the project would not result in any peculiar impacts.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. 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 GPU EIR concluded this impact to be less than significant with mitigation. The GPU was found not to result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that could result in substantial safety risks.

Project

The project site is located approximately 3.5 miles east of the Ramona Airport and is within the ALUCP for the Ramona Airport. The project site is also within the AIA, Airspace Protection, Overflight Boundary, and Federal Aviation Administration Part 77 Noticing Area. The project includes construction of two-story single-family homes that would not be greater than 30 feet in height. The project does not include construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport.

As such, the project would have a less than significant impact on air traffic patterns. Because the project would have a less than significant impact to air traffic patterns, 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 GPU EIR concluded this impact to be significant and unavoidable. The GPU's Mobility Element network includes existing roadways with horizontal and vertical curves that are sharper than existing standards and would be considered a potential transportation hazard. Additionally, the GPU EIR determined that implementation of the GPU may pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns and would also have the potential to result in hazards from at-grade rail crossings. Therefore, impacts to rural roadway safety and specific implementation programs were found to be potentially significant and mitigation measures were required.

Mitigation measures required in the GPU EIR include Tra-1.3, Tra-1.4, and Tra-1.6, described above. In addition, mitigation measure Tra-3.1, which requires coordination with SANDAG to obtain funding for operational improvements to State highways and freeways in the unincorporated area was also identified as a mitigation measure. Implementation of these mitigation measures was found to reduce impacts; however, impacts would not be reduced to below a level of significance. Additional mitigation measures were identified that would reduce impacts to below a level of significance; however, the County determined that their implementation would be infeasible. These mitigation measures were determined

to be infeasible due to related construction improvement costs; areas are not under County jurisdiction and would conflict with GPU's objectives to minimize public costs and support a multi-modal transportation network. Because the additional measures were found to be infeasible, impacts would remain significant and unavoidable.

Project

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. Access to the project would be provided from two full access driveways on 9th Street, which would also serve the residential units located on the parcel west of 10th Street. Access to the south on 10th Street would be limited to emergency vehicles only and gated. The driveways would meet County design standards and would provide adequate sight distance. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The project would have a less-than-significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. With implementation of the GPU, existing inadequate roadway widths, dead-end roads, one-way roads, and gated communities would continue to occur in unincorporated County, all of which were found to have the potential to impair emergency access. Therefore, impacts were concluded to be potentially significant and mitigation measures were required.

Mitigation measures Tra-1.3, Tra-1.4, and Tra-1.6, described above, were required to reduce impacts. In addition, mitigation measures Tra-4.1 through Tra-4.4 were identified to further reduce impacts associated with emergency access. These mitigation measures required updates to Community Plans to identify local public road and community emergency evacuation route networks and pedestrian routes as appropriate, implement the Building and Fire Codes to ensure adequate service levels, implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection, require fire protection plans to ensure requirements of County Fire Code are being met, and implement and revise as necessary the Subdivision Ordinance to ensure proposed subdivision meet design and accessibility standards. Implementation of these mitigation measures was found to reduce impacts to less than significant.

Project

Access to the project would be provided from two full access driveways on 9th Street, which would also serve the residential units located on the parcel west of 10th Street. Access to

the south on 10th Street would be limited to emergency vehicles only and gated. The project would not result in inadequate emergency access.

In addition, consistent with GPU EIR Mitigation Measures Tra-4.3, A Fire Protection Plan (6) was prepared for the project by Dudek (June 2026). According to the FPP, project site access, including fire lane, driveway, and entrance road widths, primary and secondary access, turnarounds, dead end lengths, signage, surface, and other requirements would comply with the County's roadway standards as identified in the most currently adopted San Diego County Consolidated Fire Code. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the Building and Fire codes, consistent with GPU EIR Mitigation Measure Tra-4.3. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR found that, while the GPU would create provisions for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks, many policies proposed in the GPU would require coordination between the County and the agencies responsible for public transportation planning. However, existing alternative transportation plans and policies would require modifications to be consistent with the goals and policies contained in the GPU. This was found to be considered a potentially significant impact and mitigation measures were required.

Mitigation measures Tra-5.1 and Tra-5.2 were identified to reduce impacts. These measures require when updating the Zoning Ordinance to review and revise parking regulations for senior housing and affordable housing and the preparation of town center plans for village areas that incorporate shared parking facilities and include in Community Plans were found to be applicable and were incorporated. Mitigation measures Tra-6.1 through Tra-6.9 were also identified to reduce impacts. These mitigation measures include during Community Plan updates establish police and design guidelines that encourage commercial centers in walkable configurations; establish comprehensive planning principals for transit nodes; locate County facilities near transit facilities; coordinate with SANDAG, Caltrans, and transit agencies to expand mass transit opportunities; and review the improvement plans for railroad facilities. They also require implementation and revision of Bicycle Transportation Plan every five years or as necessary, coordinate with SANDAG in the development of a Regional Bicycle Plan and implement and revise as necessary the County Trails Program for trail development and management. Implementation of mitigation measures as presented above was found to reduce impacts associated with alternative transportation to below a level of significance.

Project

The project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The project site is located near the southeast corner of the San Vicente Road and 11th Street intersection. The project site borders 9th Street, 10th Street, San Vicente Road, and a portion of 11th Street. Sidewalks are currently provided on both sides of 9th Street between Main Street and H Street, on both sides of 10th Street, on the west side of San Vicente Road, and intermittently on the east side of San Vicente Road between H Street and Hanson Lane. The nearest signalized intersection is located at the San Vicente Road and 11th Street intersection adjacent to the western boundary of the project site, providing a controlled crossing located with pedestrian push buttons and crosswalks. The project includes the addition of internal streets that would include sidewalks.

Class II bike lanes are currently provided on both sides of 10th Street, on both sides of San Vicente Road, and on both sides of Hanson Lane. There are no existing or planned bicycle facilities along 9th Street.

The nearest bus stop is located approximately 0.5 miles from the project site at the Main Street/10th Street intersection. Continuous sidewalk connectivity is available along 9th Street and 10th Street, between the project site and bus stop.

A portion of the Community Trails Master Plan (CTPM) Town Loop Connector Trail No. 113 crosses the project site. The project would use a Density Bonus Law waiver to remove the requirement to dedicate, construct and maintain this portion of the trail including the trail easement, construction, surfacing and ongoing maintenance. While the project would be waiving the trail itself, the project would still deliver the access it was intended to provide. Continuous five-foot sidewalks would run through the entire community, connecting 9th Street to San Vicente Road through an ungated layout open to the public. This meets the connectivity purpose behind Trail No. 113 without the separate corridor.

The project does not include any improvements which would inhibit the future performance of any public transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation to be significant and unavoidable. However, the project would have a less than significant impact. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures (Tra-4.3) contained within the GPU EIR would be applied to the project.

	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?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐
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?	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐

Discussion

The following technical studies were prepared for the project related to Utilities:

County of San Diego Storm Water Quality Management Plan (SWQMP) for Priority Development Projects (PDPs), prepared by C & V consulting, dated December 15, 2025.

Preliminary Drainage Report, prepared by C & V Consulting, Inc., dated December 2025.

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The development of future land uses as designated in the GPU would have the potential to result in the increased demand for wastewater treatment services at a rate disproportionate to treatment facility capabilities. The GPU EIR concluded that if new or expanded facilities were not provided to serve new development, a violation in wastewater treatment standards would occur. Therefore, impacts were found to be potentially significant, and mitigation measures were required.

Mitigation measures USS-1.1 and USS-1.3 were identified to reduce impacts. These mitigation measures require participation in interjurisdictional reviews to gather information on and review and provide comments, implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer/sanitation service for development projects, and ensure County planning staff participation on the review of wastewater facility long range and capital improvement plans. Implementation of these mitigation measures would reduce impacts to below a level of significance.

Project

The project site is served by the Ramona Municipal Water district and would connect to existing sewer and wastewater facilities. The project site does not propose to discharge domestic waste to on-site wastewater systems. The project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements as 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU has the potential to require or result in the construction of new water or wastewater treatment facilities or an expansion of existing facilities, the construction of which would have the potential to cause significant environmental effects in areas such as hydrology,

biology, and air quality. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures USS-2.1, USS-2.2, and USS-2.3 were identified to minimize impacts to new water and wastewater facilities. These mitigation measures include revising Board Policy I-63 to limit unexpected demands for new water and wastewater facilities, performing CEQA review on privately initiated water and wastewater facilities, and implementing and revising, as necessary, the Green Building Program to encourage project designs that incorporate water conservation measures, reducing the potential demand for new water purveyors. Implementation of these mitigation measures would reduce impacts related to new water and wastewater facilities to below a level of significance.

Project

The project would receive water and sewer service from the Ramona Municipal Water District. According to the County's Project Facility Availability – Sewer form and the County's Project Facility Availability – Water form prepared for the project, sewer and water facilities to serve the project are reasonably expected to be available within the next five years. The project would be required to adhere to the conditions in the project service availability letters provided by the County.

The project would require expansion of existing facilities for both water and sewer; however, the project would adhere to the conditions in the project service availability letters. The project would not result in significant environmental effects. Impacts would be less than significant.

The GPU EIR determined impacts associated with new water and wastewater treatment facilities to be less than significant with mitigation. As the project would have a less-than-significant impact, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. Implementation of the GPU has the potential to increase the amount of impermeable surfaces within the unincorporated County, thereby increasing stormwater runoff. The increase in stormwater runoff would require the construction of new stormwater facilities, or the expansion of existing facilities, to handle the increased runoff flow, which would have the potential to result in significant environmental impacts. Therefore, impacts were found to be potentially significant, and mitigation was required.

Mitigation measures USS-3.1 through USS-3.5 were identified to minimize impacts. These mitigation measures included amending the Subdivision Ordinance to add additional design requirements that encourage conservation oriented design, preparing Subdivision Design Guidelines to create a conservation oriented design for both the project and open spaces, using the County Guidelines for Determining Significance for Surface Water

Quality and Hydrology to identify adverse environmental effects on water quality, implementing the LID handbook and establish LID standards for new development to minimize runoff and maximize infiltration, and evaluating the environmental effects of all proposed stormwater drainage facilities and ensure significant effects are minimized and mitigated. Implementation of these mitigation measures was found to reduce impacts related to sufficient stormwater drainage facilities to below a level of significance.

Project

The project involves new storm water drainage facilities; however, these facilities would not result in any adverse physical effects. These new storm water facilities are identified and discussed in Section 10, *Hydrology and Water Quality*. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on stormwater drainage facilities 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable, because the GPU would increase the number of housing units and populations served within the service areas of the San Diego County Water Authority (SDCWA), member water districts, and groundwater dependent water districts. In addition, the GPU EIR determined that some groundwater basins throughout the County would be significantly impacted upon buildout of the GPU, resulting in some groundwater dependent water districts having a potentially inadequate water supply. The combined effect of the impacts related to obtaining additional water supplies, the uncertainties inherent in obtaining those supplies, and construction impacts related to extraction, processing, and/or conveyance of additional water supply led to the conclusion that impacts would be potentially significant and mitigation was required.

Mitigation measures USS-4.1 through USS-4.7 were identified to minimize impacts. These mitigation measures include review of General Plan Amendments for consistency with goals and policies of the GPU related to groundwater and water supply, implement and revise as necessary the County Green Building Program with incentives for energy efficient development, implement Policy I-84 requiring discretionary project to obtain water district commitment that water services are available, implement Groundwater Ordinance to balance groundwater resources with new development, and implement Watershed Ordinance to encourage removal of invasive species to restore natural drainage systems. Additionally, these mitigation measures require use of the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse impacts on groundwater resources; establish a water credits program between the County and Borrego Water District to encourage an equitable allocation of water resources; and to coordinate with the San Diego County Water

Authority and other water agencies to coordinate land use planning with water supply planning.

Project

The project would receive water from the Ramona Municipal Water District. According to the County's Project Facility Availability – Water prepared for the project, there is adequate water to serve the project. The project would not necessitate new or expanded entitlements. Impacts would be less than significant.

As the project would have a less-than-significant impact, 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) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU would result in increased demand on existing sewer systems due to increased sewage flows from residential, commercial, and industrial land uses. While some wastewater districts were found to have capacity to serve additional wastewater users, others were found to have inadequate capacity to serve increased demand, in addition to their existing commitments. Impacts were potentially significant, and mitigation measures were required. Implementation of mitigation measures USS-1.1, USS-1.2, and USS-1.3, described above, would reduce impacts to below a level of significance.

Project

The project would require wastewater services from the Ramona Municipal Water District, which has adequate services available to serve the project. Therefore, the project would not interfere with any wastewater treatments provider's service capacity. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities 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 within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be significant and unavoidable. The development of future land uses as designated in the GPU would have the potential to be served by landfills with insufficient capacity to accommodate the future solid waste disposal needs and that construction of additional landfills or expansion of existing landfills would be needed. Impacts were found to be potentially significant and mitigation measures were required.

Mitigation measures USS-6.1 through USS-6.8 were identified to minimize impacts. These mitigation measures include participation in interjurisdictional reviews to gather information, review all plans for large scale projects to ensure space allocation for on-site storage to

separate recyclable solid waste, promotion and enforcement of the Management of Solid Waste Ordinance requiring mandatory recycling, and promotion of the use of Board Policy B-67 requiring the County to purchase recyclable materials. Additionally, mitigation involves the regulation of refuse hauling companies through County Franchise Hauler Agreement permits, permitting and regulation of solid waste operators to ensure compliance with California Code of Regulations and Title 14 and 27, maintenance and monitoring of inactive solid waste disposal sites to ensure compliance with all applicable environmental regulations, and conduction of recycling and composting public education programs for residents, schools, and businesses. Implementation of these mitigation measures would minimize the potentially significant impact associated with sufficient landfill capacity but not to a level below significant. Additional mitigation measures were identified but were found to be infeasible by the County as they would prohibit future development in area identified for increased growth in the GPU and result in significant impacts from the construction of multiple solid waste facilities. Impacts would remain significant and unavoidable.

Project

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. Additionally, the project includes a residential development that is consistent with the land use designations of VR-7.3 and VR-2 and zoning designations of Rural Residential and Variable Family Residential for the project site and was, therefore, planned for in the County's solid waste disposal projections. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. The development of future land uses as designated in the GPU would be required to comply with Federal, State, and local statutes and regulations related to solid waste. In addition, GPU goals and policies regarding solid waste disposal would further ensure compliance with applicable regulations. Impacts associated with solid waste regulations were found to be less than significant.

Project

The project would deposit all solid waste at a permitted solid waste facility. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in 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 that were not discussed by the GPU EIR.
3. No substantial new information has been identified that 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 – Would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
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?	☐	☐	☐
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 risks or that may result in temporary or ongoing impacts in the environment?	☐	☐	☐
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as result of runoff, post-fire instability, or drainage changes?	☐	☐	☐

Discussion

The following Technical Study was prepared for the project related to Wildfire:

Fire Protection Plan, prepared by Dudek, dated June 2026.

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 GPU EIR concluded this impact to be significant and unavoidable.

Project

As discussed above under *Hazards and Hazardous Materials* 9(f), the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project site is not within a State Responsibility Area or an area designated as a Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). The project site is located within the Cal Fire/San Diego Fire Protection District (SDCFPD) jurisdictional response area. Emergency response for the project would be provided by SDCFPD Fire Station 80, located at 829 San Vicente Road, Ramona, CA 92065. The firefighting equipment located at Station 80 are Engine 80 and ALS Ambulance Paramedic 80 and the station is staffed with five responders 24 hours a day, seven days a week. Station 80 is approximately 0.3 miles from the entrance into the development on 9th Street, with a calculated travel time of approximately one minute and 20 seconds. Therefore, SDCFPD can respond to the project site within the County's adopted travel time standards, which call for a first-due unit to arrive within five minutes for urban areas, such as the project site. An electronic entrance gate would be constructed at the 10th Street entrance for emergency services only to meet the San Diego County Consolidated Fire Code requirements for both width and key switch access. Fire evacuation route signs would be provided to minimize confusion among visitors and employees in the event of an emergency evacuation order being issued. Therefore, the project would have a less than significant impact on emergency access.

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. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

19(b) The GPU EIR concluded this impact to be significant and unavoidable.

Project

As discussed above under *Hazards and Hazardous Materials* 9(g), the project would not exacerbate wildfire risks. The project site is not located within an area designated as a FHSZ by the California Department of Forestry and Fire Protection. The analysis of the project site and its fire environment found that the project site in its current undeveloped condition, is considered to include characteristics that, under favorable conditions, have the potential to facilitate fire spread. Once the project is constructed, the on-site fire potential would be lower than the current condition due to conversion of areas of wildland fuels to managed landscapes or paved areas and improved accessibility to firefighting

personnel and equipment. It is not anticipated that fire has the potential to encroach upon the project site and subject the structures to wildfire, given the project does not have an interface with wildland.

The project shall maintain an effective fuel modification zone by removing, clearing or modifying combustible vegetation and other flammable materials from areas within 100 feet from buildings or structures. Potential for wildfire encroaching onto the project would be unlikely due to the lack of wildland interface, however showering embers on the site would be possible, but the risk of ignition from such encroachments or ember showers would also be considered low based on the type of construction, fuel modification zones, and fire protection features that would be provided for the structures.

Implementation of these fire safety standards would occur during the building permit process and would be consistent with GPU mitigation measures Haz 4-2 and Haz-4.3. In addition, the project would be consistent with the Zoning Ordinance and the land use intensity established under the County of San Diego General Plan. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

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. The project would have a less-than-significant impact with the implementation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 for compliance with the building and fire codes. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

19(c) The GPU EIR concluded this impact to be significant and unavoidable.

Project

The project would require the installation and maintenance of the two driveways off 9th Street. The project includes the Roadway Vacation of a portion of 10th Street to restrict access at 10th Street through the installation of a gated entrance limited to emergency vehicle access only. The project includes construction of internal private drives, sidewalks, utilities, and stormwater infrastructure. Off-site improvements include half-width roadway improvements along 9th Street fronting the project site and approximately 1,400 square feet of frontage improvements along San Vicente Road, consistent with County standards. These proposed improvements would not exacerbate fire risk.

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 for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified in the GPU EIR.

- 19(d). The GPU EIR concluded that the GPU would result in land uses that allow residential, commercial, and industrial development in areas that are prone to wildland fires due to the fact that the majority of the unincorporated county is located in High or Very High fire threat hazard areas. Impacts were found to be potentially significant, and mitigation was required.

Mitigation measures Haz-4.1 through Haz-4.4 were identified to reduce impacts. These mitigation measures require identifying and minimizing potential fire hazards by using and maintaining a database that identifies fire prone areas and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection, conducting effective and environmentally sensitive brush management measures, enforcing and complying with Building and Fire Code to ensure there are adequate fire service levels and implement General Plan Regional Category map and Land Use Maps, and creating a Conservation Subdivision Program that facilitate conversation oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations. Implementation of these mitigation measures were found to reduce the impacts to wildland fire hazards however not to below a level of significance.

Project

As previously stated in item 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. The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a building permit. Therefore, for the reasons stated above, the project site 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.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, *Hazards and Hazardous Materials*. However, the proposed project would have a less-than-significant impact with for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than what is identified within the GPU EIR.

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-4.2 and Haz-4.3) would be applied to the project.

Attachments

Figure 1 - Project Location Map

Figure 2 – Project Site Aerial Photograph

Figure 3 – Project Site Plan

Figure 4 – General Plan Land Use Designation

Figure 5 – Zoning

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 C - GPU Mitigation Measures Applicable to the Project

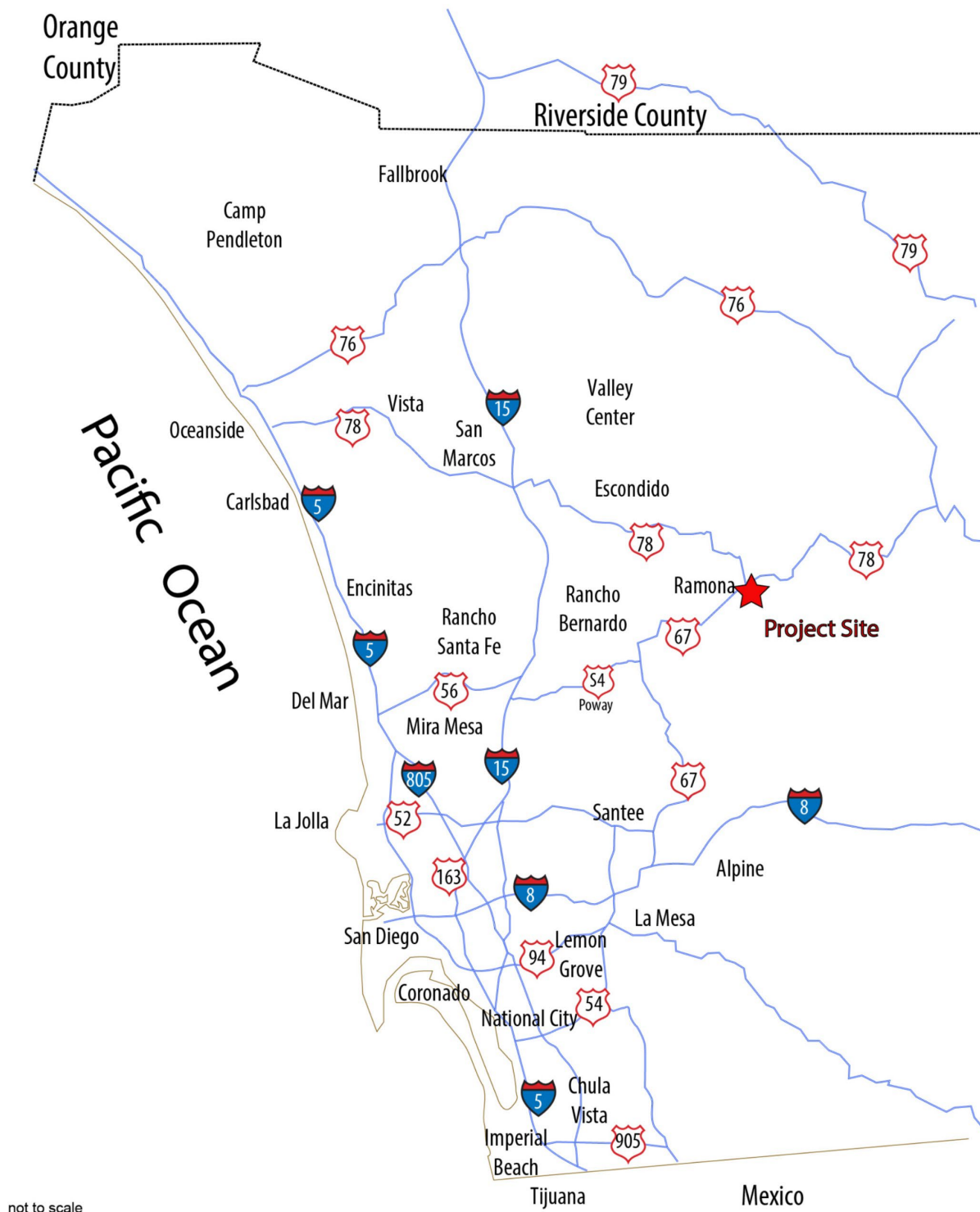


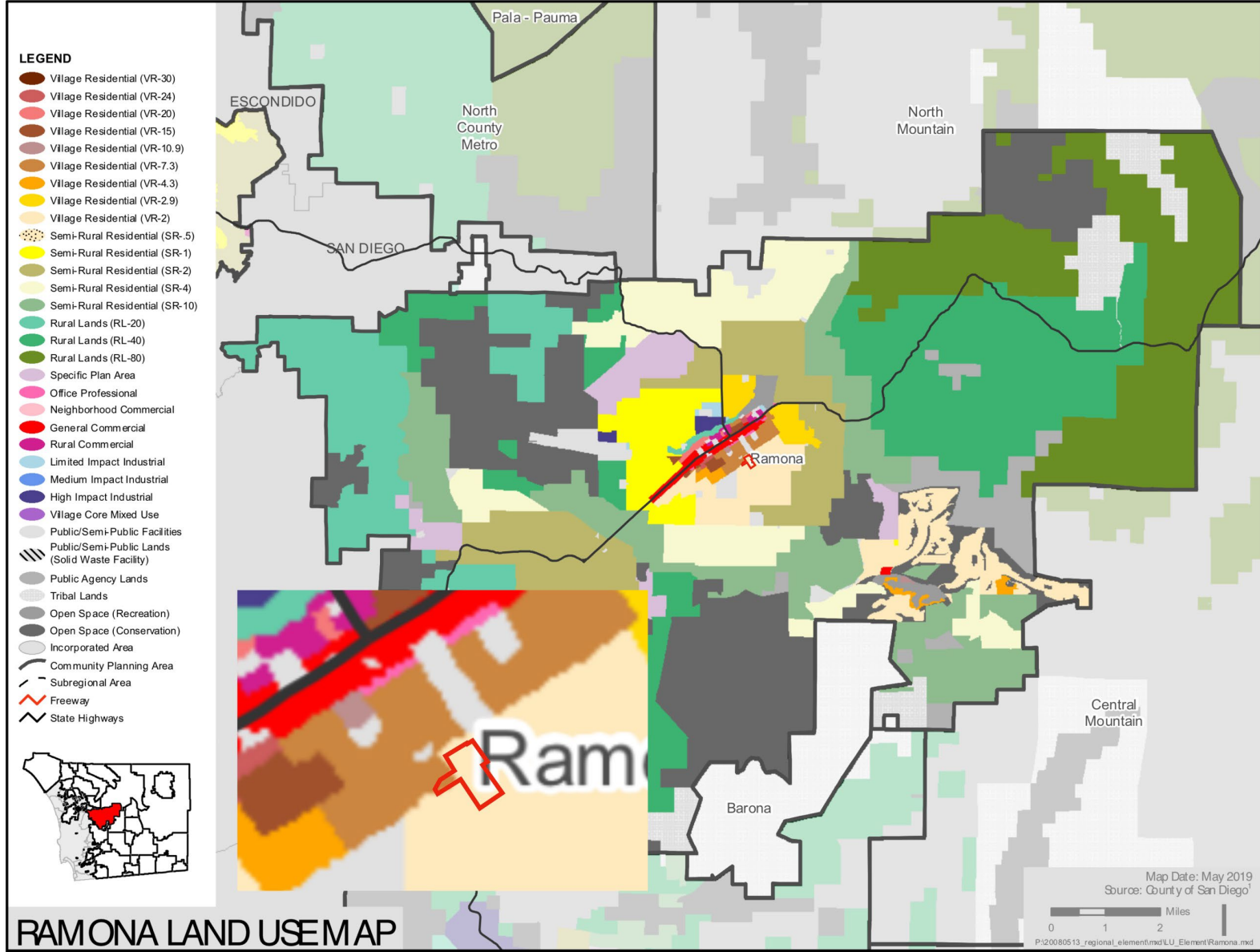
Figure 1 - Project Location Map



Figure 2 – Project Site Aerial Photograph



Figure 3 – Site Plan



San Diego County General Plan

Figure LU-A-18

Figure 4 – General Plan Land Use Designation

- Residential - Variable
- Residential Mobile Home
- Residential Single
- Rural Residential

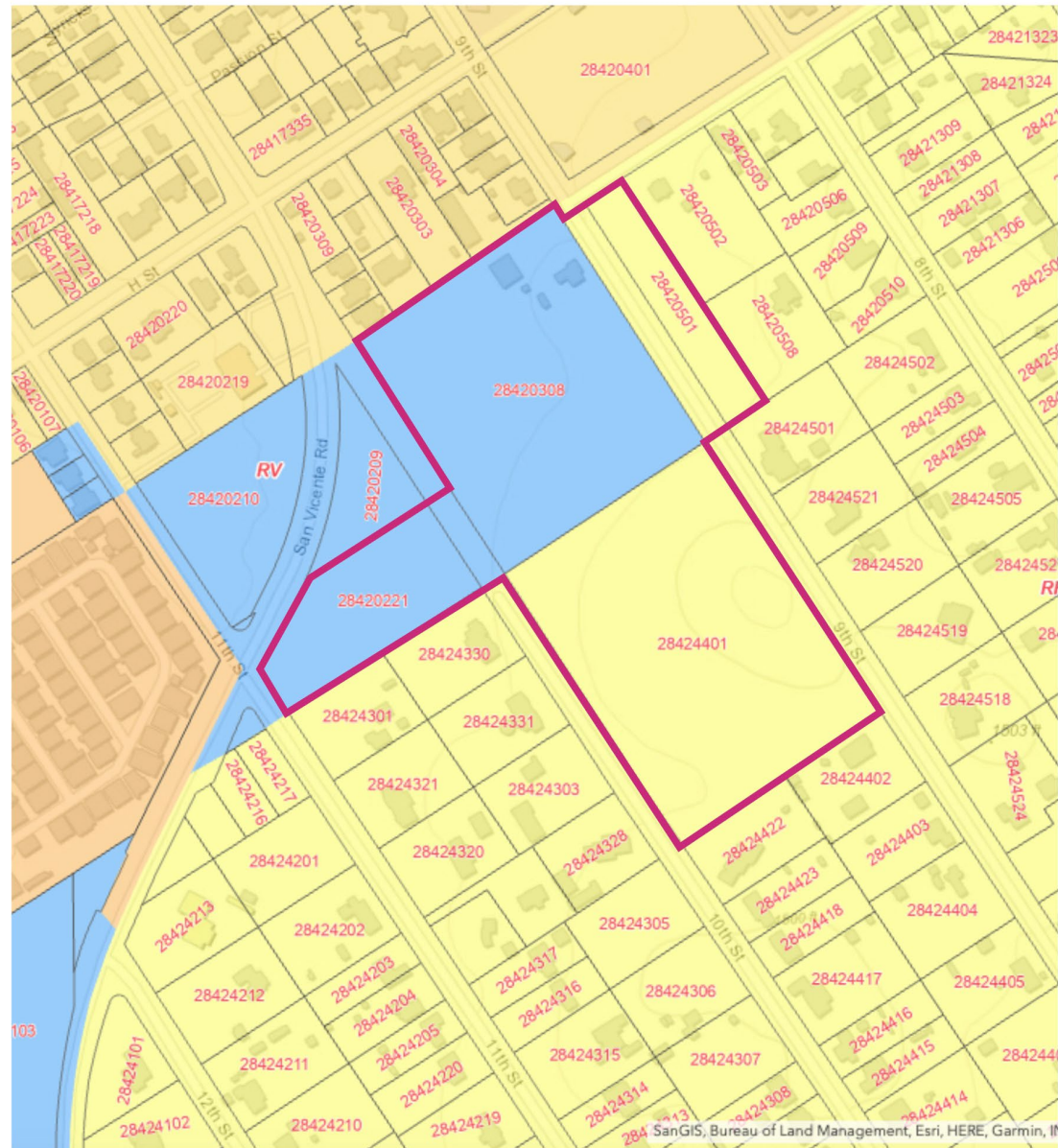


Figure 6 - Zoning

Appendix A

The following is the list of project specific technical studies used to support the project's environmental analysis. All technical studies are available on the website here https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Alden Environmental, Inc., *Biological Resource Report*, June 8, 2026.

Atlantis Group Land Use Consultants, *County of San Diego CAP Consistency Review Checklist*, July 29, 2025.

BFSA Environmental Services, *Cultural Resources Study for the 915 Ninth Street Project*, June 26, 2026.

BFSA Environmental Services, *Phase II Cultural Resources Assessment for the 915 Ninth Street Project*, June 26, 2026.

C & V Consulting, Inc., *Preliminary Drainage Report*, October 2026.

C & V consulting, *County of San Diego Stormwater Quality Management Plan (SWQMP) for Priority Development Projects (PDPs)*, October 2, 2026.

Dudek, *Fire Protection Plan*, June 2026.

Ldn Consulting, Inc., *Air Quality Assessment*, July 7, 2026.

Ldn Consulting, Inc., *Ramona 9th Street Energy Usage Letter*, March 27, 2026.

Linscott, Law, & Greenspan, Engineer, *Focused Traffic Impact Study*, December 10, 2025.

MD Acoustics, LLC, *Noise Impact Study*, June 9, 2026.

Petra Geosciences Inc., *Updated Preliminary Geotechnical Evaluation Proposed 9th Street Major Subdivision*, November 26, 2025.

RECON Environmental, Inc., *Agricultural Resources Report for the Ramona 9th Street Project*, June 30, 2026.

Stantec Consulting Services, Inc., *Phase I Environmental Site Assessment*, October 9, 2024.

References

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:

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

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:

http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf

Appendix C

GPU Mitigation Measures Applicable to the Project

GPU Mitigation Measure	Project Consistency
Air-2.5: Require that the following measures be implemented on all construction projects where project emissions are above the SLTs: • Multiple applications of water during grading between dozer/scrapper passes • Paving, chip sealing or chemical stabilization of internal roadways after completion of grading • Use of sweepers or water trucks to remove “track-out” at any point of public street access • Termination of grading if winds exceed 25 miles per hour • Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control • Use of low-sulfur fuels in construction equipment • Use of low-VOC paints • Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NO_x), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).	An Air Quality Assessment (March 2026) has been prepared for the project. That analysis concluded that the project would not result in significant air quality impacts with implementation of mitigation measures Air 2.5, Air-2.6, Air-2.7, and Air-2.9. The project would implement these measures during project construction.
Air-2.6: Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality.	An Air Quality Assessment (March 2026) has been prepared for the project. That analysis concluded that the project would not result in significant air quality impacts with implementation of mitigation measures Air 2.5, Air-2.6, Air-2.7, and Air-2.9.
Air-2.7: Implement County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction.	An Air Quality Assessment (March 2026) has been prepared for the project. The project would implement all County APCD regulations for air emissions from all s
Air-2.9: Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures	An Air Quality Assessment (March 2026) has been prepared for the project. That analysis concluded that the project would not result in significant air quality impacts with implementation of mitigation measures Air 2.5, Air-2.6, Air-2.7, and Air-2.9. The project would require all clearing and grading to be conducted with dust control measures in place.
Bio-1.5: Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also utilize the County’s Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.	A Biological Resource Report (February 2026) has been prepared for the project using the County Guidelines for Determining Significance for Biological Resources.
Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas,	A Biological Resource Report (February 2026) has been prepared for the project. That analysis concluded that the project could have a significant impact on nesting birds that are protected by the Federal Migratory Bird Treaty Act. The Biological Resource Letter Report identified mitigation that

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and populations of rare, or endangered plant or animal species.	would mitigate impacts by incorporating mitigation measure Bio-1.6 listed below. The project would comply with the RPO, BMO, and HLP Ordinance, as applicable.
Cul-1.1: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.	A Cultural Resources Study (December 2025) has been prepared for the project. That analysis found no significant impacts to historical or archaeological resources. Mitigation measures would not be required.
Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for all ground disturbing activities, and also, when feasible, during initial surveys.	A Cultural Resources Study (December 2025) has been prepared for the project. That analysis found potential for impacts to undiscovered buried archaeological resources. The project would include monitoring during ground disturbing activities as required by Cul-2.5.
Hyd-1.2: Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems.	A Preliminary Drainage Report (December 2025) and SWQPM (December 2025) were prepared for the project. The analysis found that the project would result in less than significant impacts with implementation of mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.4, and Hyd-1.5. The project would implement the Watershed Protection Ordinance, which would avoid polluted runoff discharges from the project site.
Hyd-1.3: Establish and implement LID standards for new development to minimize runoff and maximize infiltration.	A Preliminary Drainage Report (December 2025) and SWQPM (December 2025) were prepared for the project. The analysis found that the project would result in less than significant impacts with implementation of mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.4, and Hyd-1.5. The project would implement LID standards for new development to minimize project runoff and maximize infiltration on the project site.
Hyd-1.4: Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources.	A Preliminary Drainage Report (December 2025) and SWQPM (December 2025) were prepared for the project. The analysis found that the project would result in less than significant impacts with implementation of mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.4, and Hyd-1.5. The project would implement BMPs to prevent potential pollutants from entering storm water runoff.
Hyd-1.5: Utilize the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects.	A Preliminary Drainage Report (December 2025) and SWQPM (December 2025) were prepared for the project. These studies utilized the County Guidelines for Determining Significant for Surface Water Quality, Hydrology, and Groundwater Resources to identify the impacts of the project.
Noi-1.1: Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).	A Noise Impact Study (June 2026) has been prepared for the project. That analysis found that the project would not result in significant noise impacts.
Noi-5.1: Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the San Diego County Regional Airport Authority (SDCRAA) for review.	The project site is located approximately 3.5 miles east of the Ramona Airport and is within the ALUCP for the Ramona Airport. The project would use the ALUCP for the Ramona Airport as guidance/reference during development.
Tra-4.3: Implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection to evaluate adverse environmental effects of projects. Require fire protection plans to ensure the requirements of the County Fire Code and other applicable regulations are being met.	A Fire Protection Plan (December 2025) was prepared for the project. That analysis found that the project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the Building and Fire codes.

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Haz-4.2: Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection.	A Fire Protection Plan (December 20205) was prepared for the project. That analysis found that the project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the Building and Fire codes. The project would construct a six-foot-tall CMU block wall along the northwestern property line to further protect the project site from fire on the vacant lot to the northwest. The roadways surrounding the site on the northeast, west, and southwest are paved roadways providing approximately 50 feet, 30 feet, and 20 feet, respectively, of non-combustible roadway fuel breaks adjacent to the project site.
Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.	A Fire Protection Plan (December 20205) was prepared for the project. That analysis found that the project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the Building and Fire codes. Adequate service levels are available to serve the project; and the project has been designed to incorporate features that reduce fire hazards, such as all weather roads and parking stalls, irrigated landscaping, defensible space up to 200 feet from structures, and a heat deflecting CMU block wall along the northeastern edge of the project site.