

Attachment C-4

Montecito Ranch Project

Environmental Documentation

CEQA Findings (Cover)

CEQA Findings (Exhibit A – Mitigation)

CEQA Findings (Exhibit B – Overrides)

Recirculation Findings (Exhibit C)

**California Environmental Quality Act Findings for the Montecito Ranch
Project**

The Board of Supervisors makes the following findings pursuant to the California Environmental Quality Act (CEQA), relative to the Montecito Ranch Project, for which applications have been filed for a General Plan Amendment (GPA 04-013), Specific Plan (01-001), Zoning Reclassification (R-04-022), Vesting Tentative Map (VTM 20 RPL6), Site Plan (S09-019), Major Use Permit (04-045) and Major Use Permit (09-023):

1. The Board certifies that the Environmental Impact Report (EIR) dated April 2, 2010, on file with the Department of Planning and Land Use as Environmental Review Number 01-09-013, has been completed in compliance with CEQA and State CEQA Guidelines, that the Board reviewed and considered the information contained therein before approving the project, and that the EIR reflects the independent judgment and analysis of the Board.
2. The Board adopts the findings concerning mitigation of significant environmental effects attached hereto as Attachment C-4, Exhibit A, pursuant to State CEQA Guidelines section 15091.
3. The Board adopts the Decision and Explanation Regarding Recirculation of the Draft Environmental Impact Report attached hereto as Attachment C-4, Exhibit C, pursuant to State CEQA Guidelines section 15088.5(e).
4. The Board adopts the Statement of Overriding Considerations attached hereto as Attachment C-4, Exhibit B, pursuant to State CEQA Guidelines section 15093.
5. The Board adopts the Mitigation Monitoring or Reporting Program attached herein to this Board report as Attachment C-2, Vesting Tentative Map Resolution of Approval and Major Use Permit P04-045 Form of Decision, pursuant to CEQA Guidelines section 15091.

CEQA FINDINGS CONCERNING MITIGATION OF SIGNIFICANT EFFECTS

MONTECITO RANCH

**SP01-001; VTM 5250RPL⁶; P04-045; P09-023; GPA 04-013; R04-022; STP 08-019;
ER 09-013; Log No. 01-09-013
SCH No. 2002021132**

August 4, 2010

I. OVERALL FINDINGS

Pursuant to Section 21081 of the California Environmental Quality Act (CEQA) and Section 15091 of the State CEQA Guidelines, the Board of Supervisors finds as follows:

- A. For each significant effect identified in the Final Environmental Impact Report other than Significant Impact Nos. 2.1.3a, 2.1.3b, and 2.2.3a, changes or alterations have been required in, or incorporated into, the Project by Project conditions of approval of which mitigate or avoid each significant environmental effect, as explained below. (Public Resources Code section 21081, subd. (a)(1).)
- B. For significant direct impacts to roadway segments (Significant Impact No. 2.1.3a [SR 78 from Haverford Road to H Street] and Significant Impact No. 2.1.3b [SR 67 from Hunter Street to Poway Road]), the changes or alterations are within the responsibility and jurisdiction of another government agency and have been, or can and should be adopted by that other agency, and specific economic, legal and social considerations render full mitigation infeasible. (Public Resources Code Section 21081(a)(2) and (3).) Impacts would be partially mitigated by implementation of required intersection mitigation measures and other off-site improvements. The County, Caltrans and the Project Applicant have met and conferred regarding these impacts and appropriate mitigation. To fully alleviate the impacts to these two roadways, however, SR 78 would need to be widened to four lanes for a length of 2.0 miles and SR 67 would need to be widened to four lanes for a length of 9.5 miles. These improvements would require extensive conversion of existing land uses beyond the purview/ability of a private applicant and require regional highway improvements of a magnitude and scope disproportionate to the Project Applicant's development. Moreover, the Project would contribute less than 1% of the traffic to these two roadways. The resolution of existing inadequate service capacities along both of these regional arterials, which are designated state highways within the jurisdiction of Caltrans, must occur on a regional level. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the RTIP as an engineering study. However, there is no regional funding program in place for improvements to the remainder of the road way segment (SR 67 from Highland Valley Road/Dye Road to Hunter Street) for SR 78. Despite the Proposed Project intersection mitigation, impacts to roadway segments would remain significant and unmitigated. A Statement of Overriding Considerations is being adopted to address this significant and unmitigated impact.
- C. For temporary significant air quality impacts related to volatile organic compounds (VOC) emissions during construction of the Proposed Project (Significant Impact No. 2.2.3a), specific economic, technological or other considerations make the mitigation measure infeasible. (Public Resources Code Section 21080, subd. (a)(3).) The changes or alterations that could be incorporated into the Project to mitigate a temporarily significant air quality impact with respect to VOC emissions would

require the Project to paint less than one house per day. Where possible, the Project has incorporated use of low-VOC coatings that meet the requirements of Air Pollution Control District (APCD) Rule 67.0 as a matter of design. This is the industry standard and is commercially available. (Coatings generally would be water-based and typically meet a VOC content of 150 grams per liter or less, except for specialty coatings that may be needed in minor amounts on trim.) Implementation of this design consideration alone, however, would not reduce potential impacts to less than significant levels. Implementation of the measure noted above, which would stretch residential painting over a period of approximately two years, is considered infeasible for these temporary effects (i.e., it is not capable of being accomplished within a reasonable period of time, taking into account economic and technological factors), and there is no additional feasible mitigation to effectively reduce short-term impacts to below a level of significance. VOC emissions related to architectural coatings during construction for the Proposed Project would be temporarily significant and unmitigable. Therefore, impacts remain significant and unmitigated. A Statement of Overriding Considerations is being adopted to address this significant and unmitigated impact.

These findings are explained below and are supported by substantial evidence in the record of these proceedings, including materials in the County's files for this Project.

II. EXPLANATIONS OF FINDINGS BY IMPACT AREA

A. Transportation/Circulation (Subchapter 2.1 of the EIR)

Significant Impact No. 2.1.3a: Pine Street (State Route [SR] 78) between Ash Street and Main Street would operate at level of service (LOS) E under Existing Plus Project conditions, resulting in a significant direct impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.3a: This significant impact would be partially mitigated by implementation of required intersection mitigation measures (see Mitigation for Significant Impact Nos. 2.1.3c, 2.1.3f and 2.1.3g, below). To fully alleviate the impacts to this roadway segment, SR 78 would need to be widened to four lanes for a length of 2.0 miles.

Rationale: Intersections create "choke points" along a roadway, and intersection improvements facilitate better traffic flow overall as a result of better flow through the improved intersection. To fully alleviate the impacts to this roadway segment, however, SR 78 would need to be widened to four lanes for a length of 2.0 miles. Widening of smaller segments of the roadway would not alleviate the existing deficiency within this road segment. These improvements would require extensive conversion of existing land uses beyond the purview/ability of a private applicant and require regional highway improvements of a magnitude and scope disproportionate to the Project Applicant's development project. The resolution of the existing and projected inadequate service capacities along this regional arterial, which is designated a state highway and within the jurisdiction of Caltrans, must occur on a regional level. Therefore, direct impacts to this roadway segment would remain significant and unmitigable in the short-term. Refer to Section I.B., above, for additional justification. A Statement of Overriding Considerations has been prepared to address this significant and unmitigated impact.

Significant Impact No. 2.1.3b: SR 67 between Hunter Street and Poway Road would operate at LOS F under Existing Plus Project conditions, resulting in a significant direct impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.3b: This significant impact would be partially mitigated by implementation of required intersection mitigation measures (see Mitigation for Significant

Impact Nos. 2.1.3c, 2.1.3d, 2.1.3e and 2.1.3h, below). To fully alleviate the impacts to this roadway segment, SR 67 would need to be widened to four lanes for a length of 9.5 miles. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the Regional Transportation Improvement Program (RTIP) as an engineering study.

Rationale: Intersections create “choke points” along a roadway, and intersection improvements facilitate better traffic flow overall as a result of better flow through the improved intersection. To fully alleviate impacts to this roadway segment, however, SR 67 would need to be widened to four lanes for a length of 9.5 miles. Widening of smaller segments of the roadway would not alleviate the existing deficiency on this road segment. These improvements would require extensive conversion of existing land uses beyond the purview/ability of a private applicant and require regional highway improvements of a magnitude and scope disproportionate to the Project Applicant's development project. The resolution of the existing and projected inadequate service capacities along this regional arterial, which is designated a state highway within the jurisdiction of Caltrans, must occur on a regional level. Therefore, direct impacts to this roadway segment would remain significant and unmitigable in the short-term. Refer to Section I.B., above, for additional justification. A Statement of Overriding Considerations has been prepared to address this significant and unmitigated impact.

Significant Impact No. 2.1.3c: Pine Street/Main Street would operate at LOS E in the PM peak period under Existing Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.3c: The Project Applicant shall restripe the northern leg of the intersection of Pine Street/Main Street to provide a southbound to westbound right-turn/through lane or an eastbound left-turn lane onto Main Street prior to issuance of an occupancy permit on site and to the satisfaction of the Director of the County Department of Public Works (DPW).

Rationale: Expanding the northern leg of the intersection of the Pine Street/Main Street would improve LOS from E to D in the PM peak period. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the intersection impact to a less than significant level.

Significant Impact No. 2.1.3d: Main Street/Montecito Road would operate at LOS E in the PM peak period under Existing Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.3d: The Project Applicant shall acquire right-of-way and widen and restripe the northern leg of the intersection of Main Street/Montecito Road to provide a westbound right-turn lane onto Main Street, as well as signal modification, prior to issuance of an occupancy permit on site and to the satisfaction of the Director of DPW.

Rationale: Expanding the northern leg of the intersection of the Main Street/Montecito Road would improve LOS from E to D in the PM peak period. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.3e: SR 67/Highland Valley Road/Dye Road would operate at LOS F in the AM peak period under Existing Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.3e: The Project Applicant shall widen the intersection of SR 67/Highland Valley Road/Dye Road to provide dual northbound to westbound left-turn lanes prior to issuance of an occupancy permit on site and to the satisfaction of the Director of DPW.

Rationale: Expanding the intersection of the SR 67/Highland Valley Road/Dye Road would improve LOS from F to C in the AM peak period. By adding an additional turn lane (thus creating dual turn lanes), the queue to turn would decrease, thereby resulting in a decrease in delay and an improvement in LOS to C. The impact would therefore be reduced to a less than significant level.

Significant Impact No. 2.1.3f: Ash Street/Pine Street would operate at LOS E in the AM peak period and LOS F in the PM peak period under Existing Plus Project conditions, resulting in a significant cumulative impact to this intersection.

Mitigation for Significant Impact No. 2.1.3f: The Project Applicant shall install a traffic signal at the intersection of Ash Street/Pine Street (once the County and Caltrans determine that warrants are met), and widen and restripe the intersection to provide an eastbound to southbound right-turn lane onto Pine Street and a southbound to westbound right-turn lane onto Ash Street prior to issuance of the first occupancy permit on site and to the satisfaction of the Director of DPW.

Rationale: Expanding and signalizing the intersection of the Ash Street/Pine Street would improve LOS from E to C in the AM peak period and from F to C in the PM peak period. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS. The new lanes would decrease delay by moving turning traffic out of the through lanes, also resulting in improved LOS. This improvement in LOS would reduce the intersection impact to a less than significant level.

Significant Impact No. 2.1.3g: Initial projections indicated that the unsignalized intersection at Pine Street/Olive Street would operate at LOS E in the PM peak period under Existing Plus Project conditions, resulting in a significant impact to this intersection. Since analysis was completed, a signal was installed at this intersection.

Mitigation for Significant Impact No. 2.1.3g: The Project Applicant shall evaluate and potentially upgrade the existing signal at the intersection of Pine Street/Olive Street prior to issuance of an occupancy permit on site and to the satisfaction of the Director of DPW.

Rationale: Evaluation and potential upgrading of the existing signal at the intersection of the Pine Street/Olive Street would ensure operation at LOS D or better. This assurance in LOS would reduce the intersection impact to a less than significant level.

Significant Impact No. 2.1.3h: SR 67/Archie Moore Road would operate at LOS F in the AM peak period and LOS E in the PM peak period, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.3h: The Project Applicant shall install a three-way traffic signal (once the County and Caltrans determine that warrants are met) at the intersection of SR 67/Archie Moore Road prior to issuance of a permit for occupancy of homes 281 through 417 and to the satisfaction of the Director of DPW.

Rationale: Signalizing the intersection of the SR 67/Archie Moore Road would improve LOS from F to C in the AM peak period and from E to B in the PM peak period. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4a: Pine Street/10th Street between Haverford Road and H Street would operate at LOS E or F under Year 2010 Plus Project conditions, resulting in a significant cumulative impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.4a: The Project Applicant shall make a contribution via payment into the Transportation Impact Fee (TIF) program prior to issuance of an occupancy permit on site.

Rationale: Payment into the TIF would reduce the Year 2010 cumulative impact to Pine Street/10th Street between Haverford Road and H Street to a less than significant level because these fees would be used towards improvement of this roadway segment, which would improve LOS and reduce congestion. In addition, Project improvements to intersections along the roadway would help with the functionality of the road prior to full widening due to elimination of potential “choke points” along the segment.

Significant Impact No. 2.1.4b: SR 67 between Pine Street and Poway Road would operate at LOS E or F under Year 2010 Plus Project conditions, resulting in a significant cumulative impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.4b: The Project Applicant shall make a contribution via payment into the TIF program prior to issuance of an occupancy permit on site.

Rationale: Payment into the TIF would reduce the Year 2010 cumulative impact to SR 67 between 7th Street and Poway Road to a less than significant level because these fees would be used towards improvement of this roadway segment, which would improve LOS and reduce congestion. In addition, Project improvements to intersections along the roadway would help with the functionality of the road prior to full widening due to elimination of potential “choke points” along the segment.

Significant Impact No. 2.1.4c: Pine Street/Main Street would operate at LOS F in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4c: Same as Mitigation for Significant Impact No. 2.1.3c, above. The Project Applicant also shall make a payment into the TIF program prior to the issuance of the first occupancy permit.

Rationale: Expanding the northern leg of the intersection of the Pine Street/Main Street would improve LOS. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level. In addition, payment into the TIF would reduce the Year 2010 cumulative impact to the intersection of Pine Street/Main Street to a less than significant level because these fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion.

Significant Impact No. 2.1.4d: Main Street/Montecito Road would operate at LOS E in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4d: Same as Mitigation for Significant Impact No. 2.1.3d, above.

Rationale: Expanding the northern leg of the intersection of the Main Street/Montecito Road would improve LOS to D or better in the AM and PM peak periods. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4e: SR 67/Highland Valley Road/Dye Road would operate at LOS F in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4e: The Project Applicant shall make a contribution into the TIF program prior to issuance of a permit for occupancy of homes 281 through 417.

Rationale: Payment into the TIF would reduce the Year 2010 cumulative impact to the intersection of SR 67/Highland Valley Road/Dye Road to a less than significant level because these fees would be used towards future improvement of this intersection (an additional turn lane, thus creating dual turn lanes), which would improve LOS and reduce congestion. Improvements at this intersection would render it functional with the ultimate improvement of SR 67 to four lanes.

Significant Impact No. 2.1.4f: Ash Street/Pine Street would operate at LOS F in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4f: Same as Mitigation for Significant Impact No. 2.1.3f, above.

Rationale: Expanding and signalizing the intersection of the Ash Street/Pine Street would improve LOS to D or better in the AM and PM peak periods. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS. The new lanes would decrease delay by moving turning traffic out of the through lanes, also resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4g: Pine Street/Olive Street would operate at LOS F in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4g: Same as Mitigation for Significant Impact No. 2.1.3g, above.

Rationale: Evaluation and potential upgrading of the existing signal at the intersection of the Pine Street/Olive Street would ensure operation at LOS D or better. This assurance in LOS would reduce the intersection impact to a less than significant level.

Significant Impact No. 2.1.4h: SR 67/Archie Moore Road would operate at LOS F in the AM and PM peak periods under Year 2010 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4h: Same as Mitigation for Significant Impact No. 2.1.3h, above. The Project Applicant also shall make a payment into the TIF program prior to issuance of a permit for occupancy of homes 281 through 417.

Rationale: Signalizing the intersection of the SR 67/Archie Moore Road would improve LOS. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS and reducing the impact to a less than significant level. In addition, payment into the TIF would reduce the Year 2010 cumulative impact to the intersection of SR 67/Archie Moore Road to a less than significant level because these fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion.

Significant Impact No. 2.1.4i: Pine Street/10th Street between Haverford Road and H Street would operate at LOS E or F under Year 2030 Plus Project conditions, resulting in a significant cumulative impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.4i: Same as Mitigation for Significant Impact No. 2.1.4a, above.

Rationale: Payment into the TIF would reduce the Year 2030 cumulative impact to Pine Street/10th Street between Haverford Road and H Street to a less than significant level because these fees would be used towards improvement of this roadway segment, which would improve LOS and reduce congestion. In addition, Project improvements to intersections along the roadway would help with the functionality of the road prior to full widening due to elimination of potential “choke points” along the segment.

Significant Impact No. 2.1.4j: SR 67 between 7th Street and Poway Road would operate at LOS E or F under Year 2030 Plus Project conditions, resulting in a significant cumulative impact to this roadway segment.

Mitigation for Significant Impact No. 2.1.4j: Same as Mitigation for Significant Impact No. 2.1.4b, above.

Rationale: Payment into the TIF would reduce the Year 2030 cumulative impact to SR 67 between 7th Street and Poway Road to a less than significant level because these fees would be used towards improvement of this roadway segment, which would improve LOS and reduce congestion. In addition, Project improvements to intersections along the roadway would help with the functionality of the road prior to full widening due to elimination of potential “choke points” along the segment.

Significant Impact No. 2.1.4k: Pine Street/Main Street would operate at LOS F in the AM and PM peak periods under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4k: Same as Mitigation for Significant Impact No. 2.1.4c, above.

Rationale: Expanding the northern leg of the intersection of the Pine Street/Main Street would improve LOS. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level. In addition, payment into the TIF would reduce the Year 2030 cumulative impact to the intersection of Pine Street/Main Street to a less than significant level because these fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion. Improvements at this intersection would render it functional with the ultimate improvement of SR 67 and SR 78 to four lanes.

**Attachment C-4
Exhibit A**

Significant Impact No. 2.1.4l: Main Street/Montecito Road would operate at LOS E in the AM peak period and LOS F in the PM peak period under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4l: Same as Mitigation for Significant Impact No. 2.1.3d, above.

Rationale: Expanding the northern leg of the intersection of the Main Street/Montecito Road would improve LOS to D or better in the AM and PM peak periods. The new lane would decrease delay by moving turning traffic out of the through lane, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4m: SR 67/Highland Valley Road/Dye Road would operate at LOS F in the AM peak period under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4m: Same as Mitigation for Significant Impact No. 2.1.4e, above.

Rationale: Payment into the TIF would reduce the Year 2030 cumulative impact to the intersection of SR 67/Highland Valley Road/Dye Road to a less than significant level because these fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion. Improvements at this intersection would render it functional with the ultimate improvement of SR 67 to four lanes.

Significant Impact No. 2.1.4n: Ash Street/Pine Street would operate at LOS F in both the AM and PM peak periods under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4n: Same as Mitigation for Significant Impact No. 2.1.3f, above.

Rationale: Expanding and signalizing the intersection of the Ash Street/Pine Street would improve LOS to D or better in the AM and PM peak periods. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS. The new lanes would decrease delay by moving turning traffic out of the through lanes, also resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4o: Pine Street/Olive Street would operate at LOS F in both the AM and PM peak periods under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4o: Same as Mitigation for Significant Impact No. 2.1.3g, above.

Rationale: Evaluation and potential upgrading of the existing signal at the intersection of the Pine Street/Olive Street would ensure operation at LOS D or better. This assurance in LOS would reduce the intersection impact to a less than significant level.

Significant Impact No. 2.1.4p: SR 67/Archie Moore Road would operate at LOS F in both the AM and PM peak periods under Year 2030 Plus Project conditions, resulting in a significant impact to this intersection.

Mitigation for Significant Impact No. 2.1.4p: Same as Mitigation for Significant Impact No. 2.1.4h, above.

Rationale: Signalizing the intersection of the SR 67/Archie Moore Road would improve LOS. The proposed signal would reduce delays experienced at an unsignalized intersection, thereby improving LOS. This improvement in LOS would reduce the impact to a less than significant level. In addition, payment into the TIF would reduce the Year 2030 cumulative impact to the intersection of SR 67/Archie Moore Road to a less than significant level because these fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion to render it functional with the ultimate improvement of SR 67 to four lanes.

Significant Impact No. 2.1.4q: A significant impact would occur to the intersection of SR 78/Magnolia Avenue under Year 2030 Plus Project conditions.

Mitigation for Significant Impact No. 2.1.4q: The Project Applicant shall make a contribution into the TIF program prior to issuance of a permit for occupancy of homes 281 through 417. These fees will contribute to required mitigation at this location, including the addition of one lane north of SR 78 for a distance of approximately 175 feet, plus a 90-foot transition.

Rationale: Payment into the TIF would reduce the Year 2030 cumulative impact to the intersection of SR 78/Magnolia Avenue to a less than significant level because these contributions/fees would be used towards improvement of this intersection, which would improve LOS and increase the capacity of the road, thereby reducing congestion. This improvement would reduce the impact to a less than significant level.

Significant Impact No. 2.1.4r: A significant impact would occur to the intersection of Main Street/14th Street under Year 2030 Plus Project conditions.

Mitigation for Significant Impact No. 2.1.4r: The Project Applicant shall make a contribution into the TIF program prior to issuance of a permit for occupancy of the 281 through 417. These fees will contribute to required mitigation at this location, which may include a new northbound to eastbound right-turn lane, a minor signal modification, and curb returns at all corners.

Rationale: A fair-share contribution or payment into the TIF would reduce the Year 2030 cumulative impact to the intersection of Main Street/14th Street to a less than significant level because these contributions/fees would be used towards improvement of this intersection, which would improve LOS and reduce congestion. The new lane would decrease delay by moving turning traffic out of the through lanes, thereby resulting in improved LOS. This improvement in LOS would reduce the impact to a less than significant level.

B. Air Quality (Subchapter 2.2 of the EIR)

Significant Impact No. 2.2.3a: Project construction as proposed would have a temporarily significant air quality impact with respect to VOC emissions.

Mitigation for Significant Impact No. 2.2.3a: In order to mitigate temporary project-direct air quality impacts related to VOC emissions to less than significant levels, the Project would have to paint less than one house per day.

Rationale: The Project has incorporated use of low-VOC coatings that meet the requirements of APCD Rule 67.0 where possible as a matter of project design. The low-VOC coatings generally would be water-based and typically meet a VOC content of 150 grams per liter or less, except for specialty coatings that may be needed in minor amounts on trim. (This VOC content is the industry standard and is commercially available.) Implementation of this design consideration alone, however, would not reduce potential impacts to less than significant levels.

Implementation of the mitigation measure noted above, stretching residential painting over a period of approximately two years, is considered infeasible for these temporary effects. It is considered infeasible because it is not capable of being accomplished within a reasonable period of time, taking into account economic and technological factors, and there is no additional feasible mitigation to effectively reduce short-term impacts to below a level of significance. VOC emissions related to architectural coatings during construction for the Proposed Project would be significant and unmitigable. A Statement of Overriding Considerations has been prepared to address this significant and unmitigated impact.

Significant Impact No. 2.2.4a: Because the Project's VOC emissions during construction would be above the significance threshold, the Project would have a cumulatively significant, but temporary, impact on air quality.

Mitigation for Significant Impact No. 2.2.4a: The Project will require 10 percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters, and/or California Air Resources Board (ARB) certified Tier I, II, or III equipment.

Rationale: County Department of Planning and Land Use (DPLU) has determined that conversion of 10 percent of the construction fleet comprises a reasonable (feasible) percent given cost prohibitions. Ten percent was determined to be a reasonable requirement based on the amount of contractors whose fleets have already been retrofitted and engines repowered as a result of the local and neighboring Carl Moyer Programs (this was identified as effective mitigation by the South Coast Air Quality Management District and assumes current routine retrofit of construction equipment). With use of 10 percent of the construction fleet retrofitted and/or repowered and use of low-VOC coatings, the Project would mitigate significant emissions. Associated impacts, following mitigation, would be reduced to less than significant levels.

C. Land Use and Planning (Subchapter 3.1 of the EIR)

Significant Impact No. 3.1.3a: Potentially significant noise impacts to an estimated 88 on-site residences located within approximately 500 feet of the centerline of Montecito Ranch Road represent a potentially significant land use plan conflict with Policy 1 of the Noise Element of the RCP recommending land use and circulation patterns designed to minimize noise in residential neighborhoods.

Mitigation for Significant Impact No. 3.1.3a: Mitigation for Significant Impact Nos. 3.3.3c and 3.3.3d, which includes establishment of a noise protection easement on site at a distance of approximately 500 feet from the centerline of Montecito Ranch Road, as identified in Subchapter 3.3,

Noise, would reduce potentially significant land use plan impacts to on-site residences related to conformance with Policy 1 of the RCP Noise Element to below a level of significance.

Rationale: Mitigation from Subchapter 3.3, Noise, would include establishment of a noise protection easement on site at a distance of approximately 500 feet from the centerline of Montecito Ranch Road. Implementation of the proposed mitigation would ensure compliance with the County Noise Ordinance. The purpose of the Noise Ordinance includes controlling disturbing, offensive and excessive noise, providing an environment in which noise is not detrimental to life, health and enjoyment of property and “securing and promoting the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants” (County Code Sections 36.401[b], [d], and [e]). Because the noise standards specified in the ordinance have been defined based on industry standards regarding how sound travels and how it is generally perceived by sensitive receptors, compliance with the ordinance would ensure that noise generated on the Project site would fall within generally acceptable limits for on-site residences. With implementation of this mitigation, this impact would be reduced to a less than significant level.

Significant Impact No. 3.1.3b: Potentially significant noise impacts to two off-site residences along Montecito Way represent a potentially significant land use plan conflict with Policy 1 of the Noise Element of the RCP recommending land use and circulation patterns designed to minimize noise in residential neighborhoods.

Mitigation for Significant Impact No. 3.1.3b: Mitigation for Significant Impact No. 3.3.3e in Subchapter 3.3, Noise, would reduce potentially significant land use plan impacts due to noise levels along Montecito Way to below a level of significance. This measure includes construction of noise walls or rubberized asphalt in front of the two houses that would be significantly affected by noise levels.

Rationale: Mitigation identified in Subchapter 3.3, Noise, would reduce impacts to below a level of significance. Per noise mitigation required in Subchapter 3.3 and cited above, placement of four-foot high solid noise walls on private property between Montecito Way and these two houses would mitigate impacts to below a level of significance. If an agreement cannot be reached between the Project Applicant and the affected property owners, the noise walls shall be constructed within the right-of-way along Montecito Way or the roadway will be paved with rubberized asphalt in front of the homes and extending 300 feet north and south beyond the homes. Mitigation would reduce potentially significant land use plan impacts due to noise levels along Montecito Way to less than significant levels, because implementation of the proposed mitigation would lower roadway noise experienced at the receptor locations to meet County Noise Ordinance standards. Compliance with the noise limits in the Ordinance would ensure that noise generated by Project traffic and affecting off-site receptors would be within levels generally acceptable to noise-sensitive receptors.

Significant Impact No. 3.1.3c: Significant short-term impacts to community character would result along Montecito Way due to the removal of mature trees and additional pavement width.

Mitigation for Significant Impact No. 3.1.3c: Mitigation for Significant Impact No. 3.5.3a in Subchapter 3.5, Aesthetics, would reduce significant short-term community character impacts to the Montecito Way viewshed to below a level of significance. This measure includes planting the sides of the roadway with trees and shrubs similar to those currently present along the roadway.

Rationale: Per mitigation required in Subchapter 3.5 and cited above, mitigation would include the replacement trees and shrubs along Montecito Way to offset any loss as part of the Project design and would reduce the visual effect of remaining impacts related to increased pavement width to less than

significant levels. Landscaping along this roadway would include existing species in the area to ensure compatibility with the existing community character. Therefore, significant impacts would not be long-term.

Significant Impact No. 3.1.3e: Because of the significant impact to noise levels of two homes along Montecito Way, which would result in the placement of two noise walls in front of these homes, the Project would significantly affect the existing community character of Montecito Way.

Mitigation for Significant Impact No. 3.1.3e: Mitigation for Significant Impact No. 3.5.3a in Subchapter 3.5, Aesthetics, would reduce significant community character impacts due to noise levels along Montecito Way to below a level of significance. This measure includes planting of screening vegetation in front of the proposed walls along Montecito Way. Implementation of Mitigation for Significant Impact No. 3.1.3d also will help mitigate this impact.

Rationale: Mitigation identified in Subchapter 3.3, Noise, would reduce impacts to below a level of significance. Per noise mitigation required in Subchapter 3.3 and cited above, placement of four-foot high solid noise walls on private property between Montecito Way and these two houses would mitigate impacts to below a level of significance. If an agreement cannot be reached between the Project Applicant and the affected property owners, the noise walls shall be constructed within the right-of-way along Montecito Way or the roadway will be paved with rubberized asphalt in front of the homes and extending 300 feet north and south beyond the homes. Mitigation would reduce potentially significant land use plan impacts due to noise levels along Montecito Way to less than significant levels, because implementation of the proposed mitigation would lower roadway noise experienced at the receptor locations to meet County Noise Ordinance standards. Compliance with the noise limits in the Ordinance would ensure that noise generated by Project traffic and affecting off-site receptors would be within levels generally acceptable to noise-sensitive receptors.

D. Biological Resources (Subchapter 3.2 of the EIR)

Significant Impact No. 3.2.3a: The Proposed Project would result in direct impacts to 0.95 acre of on-site dense Engelmann oak woodland under both Wastewater Management Options 1 and 2.

Mitigation for Significant Impact No. 3.2.3a: Direct impacts to 0.95 acre of on-site dense Engelmann oak woodland shall be mitigated at a 3:1 ratio through the preservation of 2.85 acres of dense Engelmann oak woodland within on-site dedicated open space. (Wastewater Management Options 1 and 2)

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 2:1 ratio for this habitat within the Draft North County Multiple Species Conservation Program (MSCP) Subarea Area. Although not required as mitigation, an additional 9.80 acres of this habitat will be retained on site within dedicated open space as part of Project design.

Significant Impact No. 3.2.3b: The Proposed Project would result in direct impacts to 0.38 acre of on-site open Engelmann oak woodland under both Wastewater Management Options 1 and 2.

Mitigation for Significant Impact No. 3.2.3b: Direct impacts to 0.38 acre of on-site open Engelmann oak woodland shall be mitigated at a 3:1 ratio through the preservation of 1.14 acres of open Engelmann oak woodland within on-site dedicated open space. (Wastewater Management Options 1 and 2)

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 2:1 ratio for this habitat within the Draft North County MSCP Subarea Area. Although not required as mitigation, an additional 17.08 acres of this habitat will be retained on site within dedicated open space as part of Project design.

Significant Impact No. 3.2.3c: The Proposed Project would result in direct impacts to 69.31 acres of on-site Diegan coastal sage scrub under both Wastewater Management Options 1 and 2.

Mitigation for Significant Impact No. 3.2.3c: Direct impacts to 69.31 acres of on-site Diegan coastal sage scrub shall be mitigated at a 2:1 ratio through the preservation of 138.62 acres of Diegan coastal sage scrub within on-site dedicated open space. (Wastewater Management Options 1 and 2)

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat was developed based on Natural Community Conservation Planning (NCCP) Guidelines, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 1.5:1 ratio for this habitat within the Draft North County MSCP Subarea Area. Although not required as mitigation, an additional 111.0 acres of this habitat will be retained on site within dedicated open space as part of Project design.

Significant Impact No. 3.2.3d: The Proposed Project would result in direct impacts to 120.19 acres of on-site southern mixed chaparral under both Wastewater Management Options 1 and 2.

Mitigation for Significant No. Impact 3.2.3d: Direct impacts to 120.19 acres of on-site southern mixed chaparral shall be mitigated at a 0.5:1 ratio through the preservation of 60.10 acres of southern mixed chaparral within on-site dedicated open space. (Wastewater Management Options 1 and 2)

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. Although not required as mitigation, an additional 48.81 acres of this habitat will be retained on site within dedicated open space as part of Project design.

Significant Impact No. 3.2.3e: The Proposed Project would result in direct impacts to 12.26 acres of on-site chamise chaparral under both Wastewater Management Options 1 and 2.

Mitigation for Significant No. Impact 3.2.3e: Direct impacts to 12.26 acres of on-site chamise chaparral shall be mitigated at a 0.5:1 ratio through the preservation of 6.13 acres of chamise chaparral within on-site dedicated open space. (Wastewater Management Options 1 and 2)

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. Additionally, this standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. Although not required as mitigation, an additional 6.81 acres of this habitat will be retained on site within dedicated open space as part of Project design.

Significant Impact No. 3.2.3f: The Proposed Project would result in direct impacts to 26.91 acres of on-site non-native grassland under Wastewater Management Option 1 or 27.67 acres under Option 2. In addition, if wetland (riparian woodland) impacts associated with off-site road and/or sewer improvements are mitigated for on the Project site rather than through an off-site mitigation bank (see Mitigation for Significant Impact No. 3.2.3o), additional impacts to non-native grassland will occur (as creation of the wetlands would result in removal of non-native grassland).

Mitigation for Significant Impact No. 3.2.3f: Direct impacts to 26.91 acres of on-site non-native grassland shall be mitigated at a 1:1 ratio through the preservation of 6.63 acres of non-native grassland within on-site dedicated open space and the purchase of 20.28 acres of non-native grassland in an approved mitigation bank or area approved by the Director of DPLU. The 1:1 ratio accounts for a 0.5:1 mitigation ratio for impacts to non-native grassland habitat and an additional 0.5:1 mitigation ratio for impacts associated with the loss of raptor foraging lands in the Ramona Grasslands area. (Wastewater Management Option 1 only)

Direct impacts to 27.67 acres of on-site non-native grassland shall be mitigated at a 1:1 ratio through the preservation of 5.87 acres of non-native grassland within on-site dedicated open space and the purchase of 21.80 acres of non-native grassland in an approved mitigation bank or area approved by the Director of DPLU. The 1:1 ratio accounts for a 0.5:1 mitigation ratio for impacts to non-native grassland habitat and an additional 0.5:1 mitigation ratio for impacts associated with the loss of raptor foraging lands in the Ramona Grasslands area. (Wastewater Management Option 2 only)

If wetland (riparian woodland) impacts associated with off-site road and/or sewer improvements are mitigated for on the Project site, impacts to the on-site non-native grassland occurring as a result of their use for wetland creation also will require mitigation. Mitigation for impacted non-native grassland will be required at a 2:1 ratio because the proposed mitigation site is already allocated for mitigation from previous impacts to the property. This mitigation will be required to occur within a parcel approved by the Director of DPLU. Specifically, direct impacts to 0.24 acre of non-native grassland shall require the preservation of 0.48 acre of non-native grassland.

Rationale: Implementation of these mitigation measures would reduce the option impacts to a less than significant level because the mitigation ratios for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this

mitigation ratio. The 1:1 ratio accounts for a 0.5:1 mitigation ratio for impacts to non-native grassland habitat and an additional 0.5:1 mitigation ratio for impacts associated with the loss of raptor foraging lands in the Ramona Grasslands area. Additionally, this standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat.

Sufficient land currently exists within the Project's vicinity to meet the required mitigation measures for impacts to non-native grasslands, as described above. Specifically, three privately owned, large parcels containing approximately 197 acres are located within the Ramona Grasslands. Smaller parcels also occur within the region. Although not required as mitigation, up to an additional 16.68 acres of this habitat will be retained on site within dedicated open space as part of Project design under both Wastewater Management options.

Significant Impact No. 3.2.3g: The Proposed Project would directly impact approximately 3,500 linear feet of Waters of the U.S., all of which is considered jurisdictional by California Department of Fish and Game (CDFG) and 300 linear feet of Waters of the U.S. considered jurisdictional by the U.S. Army Corps of Engineers (Corps) under both Wastewater Management Options 1 and 2.

Mitigation for Significant Impact No. 3.2.3g: Prior to grading, sufficient evidence must be provided to the County Director of DPLU that all State and federal wetland permits have been obtained or that permits are not required. (Wastewater Management Options 1 and 2)

Direct impacts to 3,500 linear feet of on-site jurisdictional Waters of the U.S. shall be mitigated by the preservation of the remaining Waters of the U.S. on site (approximately 19,215 linear feet). (Wastewater Management Options 1 and 2)

Rationale: Implementation of these mitigation measures would fully mitigate impacts to these non-vegetated jurisdictional areas because the typical mitigation ratio for impacts to Waters of the U.S. is 1:1, which is a ratio the resource agencies reviewed and approved. The Project would mitigate at a 5.5:1 ratio. This exceeds the requirement by approximately 450 percent.

Significant Impact No. 3.2.3h: The Proposed Project would impact portions of occupied Diegan coastal sage scrub supporting two coastal California gnatcatcher (*Poliottila californica californica*) pairs.

Mitigation for Significant Impact No. 3.2.3h: Direct impacts to the coastal California gnatcatcher shall be mitigated by the preservation of 249.62 acres of suitable and occupied gnatcatcher habitat (Diegan coastal sage scrub) on site. (Wastewater Management Options 1 and 2)

If Project grading, clearing, or construction activities are scheduled to begin during the breeding season for coastal California gnatcatcher (February 15 through August 30), surveys pursuant to USFWS protocol shall be conducted to determine the presence or absence of the species in coastal sage scrub habitat within 300 feet of proposed activities. If it is determined that the species is absent, activities may proceed without restrictions. If the coastal California gnatcatcher is present, no grading, clearing, or construction activities shall be allowed between February 15 and August 30 within 300 feet of the habitat for this species or until the nest is vacated, as determined by a qualified biologist.

Rationale: The habitat preservation ratio for Diegan coastal sage scrub (2:1) is effective, because through retention of sustainable habitat, sensitive species can continue to thrive. Protected habitat

provides compensation for the wildlife value of Diegan coastal sage scrub. The specified habitat mitigation ratio for Diegan coastal sage scrub takes into consideration the importance of preserving areas necessary to ensure the continued survival of coastal California gnatcatchers. The mitigation would preserve species habitat, and thus, help ensure survival of gnatcatchers within the Project site (open space) and within the County. The Diegan coastal sage scrub mitigation ratio utilized for impacts to gnatcatcher habitats were developed based upon NCCP Guidelines intended to accomplish preservation of sensitive species, and the wildlife agencies have reviewed and approved this mitigation ratio. Mitigation for indirect impacts to coastal California gnatcatchers also includes cessation of grading or construction activities if species nests are located within 300 feet of a construction area. Gnatcatchers would be protected from disturbance associated with movement and noise from construction activities during the breeding season due to the required 300-foot distance between construction activities and active nests, a distance determined by the wildlife agencies to adequately attenuate the disturbance. Because the daily activities of this species would not be disrupted, breeding and nesting activities would continue within proposed on-site open space, thus helping to ensure the survival of this species. Implementation of these mitigation measures would reduce impacts to coastal California gnatcatchers to less than significant levels.

Significant Impact No. 3.2.3i: The reduction in foraging habitat for raptors would result in a significant impact.

Mitigation for Significant Impact No. 3.2.3i: Same as Mitigation for Significant Impact No. 3.2.3f, above.

Rationale: The habitat preservation ratio is effective, because through retention of sustainable foraging habitat, sensitive species can continue to thrive. The protected habitat sets aside grasslands with the same wildlife value as the impacted non-native grassland. The specified habitat mitigation ratio takes into consideration the importance of preserving areas necessary to ensure the continued survival of raptors. The mitigation would preserve species habitat, and thus, help ensure survival of raptors within the Project site (open space) and within the County. The mitigation ratio utilized for impacts to raptor habitats was developed based upon retention of foraging habitat, and the wildlife agencies have reviewed and approved this mitigation ratio. Implementation of this mitigation measure would reduce impacts to raptors to less than significant levels.

Significant Impact No. 3.2.3j(a): Indirect impacts from the proposed development on sensitive upland habitats would include diminished habitat quality along the edge of development areas, primarily because of exotic plants and animals, and increased chance of human encroachment.

Significant Impact No. 3.2.3j(b): Indirect impacts from the Proposed Project on riparian and woodland habitat (dense and open Engelmann oak woodland, southern coast live oak riparian forest, and southern riparian scrub) would include diminished habitat quality along the edge of development areas, primarily because of exotic plants and animals, and increased chance of human encroachment.

Significant Impact No. 3.2.3k: There is the potential for significant indirect impacts to sensitive plant species preserved within the open space (attributed to trampling, illegal off-road vehicle use, erosion due to excessive stormwater runoff, and plant collection).

Significant Impact No. 3.2.3l: The Proposed Project could result in significant indirect impacts to sensitive wildlife on site.

Significant Impact No. 3.2.3m: Removal of any Diegan coastal sage scrub during the gnatcatcher breeding season (February 15 through August 30) or any grading, clearing, or construction activities within 300 feet of an active coastal California gnatcatcher nest would be significant.

Significant Impact No. 3.2.3n: - Any grading, clearing, or construction within 300 feet of an active raptor nest between the raptor breeding season (February 15 and July 15) would be significant.

Mitigation for Significant Impact Nos. 3.2.3j through n: In summary, the Project Applicant shall participate in a Lighting and Maintenance District (LMD) as the funding mechanism for the long-term management of open space. Biological monitoring of clearing and grading shall be conducted. Should work occur during bird breeding seasons (including coastal California gnatcatcher), noise monitoring shall be conducted. The limits of the sensitive habitat and plant species populations shall be flagged or fenced prior to grading to prevent inadvertent impacts. If Project grading, clearing, or construction activities are scheduled to begin during the breeding season for raptors (February 15 through July 15), surveys shall be conducted by a qualified biologist to determine the presence or absence of nesting raptors within 300 feet of proposed activities. If it is determined that nesting raptors are absent, activities may proceed without restrictions. If an active raptor nest is present, no grading, clearing, or construction activities shall be allowed between February 15 and July 15 within 300 feet of the active nest or until the nest is vacated, as determined by a qualified biologist. Prior to issuance of an occupancy permit, a fence shall be installed to create a permanent barrier between residential yards and open space. The Project shall implement the required Resource Management Plan for the Proposed Project. Selected areas along on-site trails shall be fenced with lodgepole fencing at select locations to provide direction and prevent encroachment into the open space. Exotic plant species shall be removed from high quality woodlands, wetlands, and grasslands on an as-needed basis. Trash shall be removed from open space annually. All habitats and sensitive plant and animal species shall be monitored annually. Biological surveys shall be conducted every five years for sensitive plant and animal species.

Rationale: These mitigation measures would be adequate to avoid or reduce Project impacts because they would ensure that construction equipment and personnel would not be allowed outside of the limits of grading, thus preventing indirect impacts to habitats and sensitive species during construction. Species survival in this area would be ensured during grading and construction activities. A funding mechanism also would be provided to manage and preserve the open space in perpetuity. Mitigation for indirect impacts to gnatcatchers and raptors would include cessation of grading or construction activities if raptor nests are located within 300 feet of an area. This mitigation would be appropriate because raptors would be protected from construction activities and noise during the breeding season due to the required distance between construction activities and active nests. As stated above with regard to gnatcatchers, this distance has been approved by the wildlife agencies, because noise at this distance would not disrupt the daily activities of these species, supporting continuation of breeding and nesting activities within proposed on-site open space, and helping to ensure species' survival. Implementation of the required Resource Management Plan by an approved Resource Manager would ensure long-term maintenance of the proposed open space. Indirect impacts to habitat and sensitive plant and animal species during and after Project construction would be mitigated to less than significant levels.

Significant Impact No. 3.2.3o: The Proposed Project would result in direct impacts to 0.24 acre of off-site riparian woodland.

Mitigation for Significant Impact No. 3.2.3o: Direct impacts to 0.24 acre of off-site riparian woodland shall be mitigated at a 3:1 ratio through the creation of 0.24 acre (1:1 ratio) of riparian

woodland and the preservation of 0.48 acre of riparian woodland, for a total of 0.72 acre. Mitigation shall occur within an approved mitigation bank or area approved by the Director of DPLU.

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 2:1 ratio for this habitat within the Draft North County MSCP Subarea Area.

Significant Impact No. 3.2.3p: The Proposed Project would result in direct impacts to 2.20 acres of off-site Diegan coastal sage scrub.

Mitigation for Significant Impact No. 3.2.3p: Direct impacts to 2.20 acres of off-site Diegan coastal sage scrub shall be mitigated at a 2:1 ratio through the preservation and/or purchase of 4.40 acres of Diegan coastal sage scrub within on-site dedicated open space and/or an approved mitigation bank or area approved by the Director of DPLU.

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat was developed based on NCCP Guidelines, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 1.5:1 ratio for this habitat within the Draft North County MSCP Subarea Area.

Significant Impact No. 3.2.3q: The Proposed Project would result in direct impacts to 5.00 acres of off-site non-native grassland.

Mitigation for Significant Impact No. 3.2.3q: Direct impacts to 5.00 acres of off-site non-native grassland shall be mitigated at a 1:1 ratio through the purchase of 5.00 acres of non-native grassland in an approved mitigation bank or area approved by the Director of DPLU.

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. Additionally, this standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat.

Significant Impact No. 3.2.3r: The Proposed Project would result in direct impacts to 2.10 acres of off-site agriculture/pasture land.

Mitigation for Significant Impact No. 3.2.3r: Direct impacts to 2.10 acres of off-site agriculture/pasture land shall be mitigated at a 1:1 ratio through the purchase of 2.10 acres of mitigation credit in an approved mitigation bank or area approved by the Director of DPLU that is equal to or "like functioning" to the impacted pasture.

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat matches that of the similar non-native grassland. The ratio is effective because reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of foraging habitat for wildlife species, such as raptors.

Significant Impact No. 3.2.3s: Proposed improvements to Montecito Road would result in impacts to 0.24 acre of CDFG, Corps, and County Resource Protection Ordinance (RPO) wetlands.

Mitigation for Significant Impact No. 3.2.3s: Same as Mitigation for Significant Impact No. 3.2.3o, above.

Rationale: Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. This standard ratio has been applied to projects within the County since DPLU developed its first Biological Report Guidelines in the mid 1990s (adopted by the Board of Supervisors). The ratio is effective because these reviewing agencies have reached consensus that retention at these ratios will result in sustainable levels of this habitat. In addition, this applied mitigation ratio is greater than the recommended 2:1 ratio for this habitat within the Draft North County MSCP Subarea Area.

E. Noise (Subchapter 3.3 of the EIR)

Significant Impact No. 3.3.3a: Noise impacts associated with Project construction may be significant if equipment operates within 300 feet of existing residences.

Significant Impact No. 3.3.3b: Significant temporary construction noise impacts may occur to residences located adjacent to the proposed off-site road and utilities improvements (i.e., along Ash Street, Pine Street, Montecito Way, Montecito Road, Kalbaugh Street, and several of the proposed intersection improvement areas).

Mitigation for Significant Impact Nos. 3.3.3a and 3.3.3b: All construction equipment shall use properly operating mufflers.

All construction staging shall be performed as far as possible from occupied dwellings.

Anticipated heavy equipment operations for full workdays within 300 feet of any occupied dwelling shall require a noise control plan that either ensures that the residence is unoccupied during the workday or reduces the hours of allowable operation such that the 75 dB(A) noise standard is met. Alternatively, temporary, movable barriers could be utilized to mitigate noise impacts to residents adjacent to the proposed off-site road and utilities improvements.

Rationale: The goals of the Noise Ordinance are to control disturbing, offensive and excessive noise, provide an environment in which noise is not detrimental to life, health and enjoyment of property, and “secure and promote the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants” (County Code sections 36.401(b), (d) and (e)). The Noise Element likewise is designed to protect noise sensitive land uses from harmful noise. Compliance with the standards and criteria of the Noise Ordinance and the Noise Element will mitigate potential environmental impacts resulting from noise. This would occur because (1) the sensitive receptor would be absent (and therefore unaffected) or (2) cutting

operational time in half would reduce energy in half (or approximately 3 dB). As a result, the noise level averaged over eight hours can be reduced to less than 75 dB(A). Implementation of these mitigation measures would reduce short-term construction noise levels at off-site residential properties to less than the County Noise Ordinance standard of 75 dB(A). With implementation of this mitigation, the identified impact would be reduced to a less than significant level.

Significant Impact No. 3.3.3c: Significant exterior noise impacts would occur to an estimated 88 Montecito Ranch homes (on lots 1 through 8, 119, 120, 144, 145, 148 through 166, 235 through 244, 250 through 260, 268 through 275, 376, 377, 389 through 397, 398 through 400, and 412 through 425).

Significant Impact No. 3.3.3d: Noise impacts to the interior of proposed homes along Montecito Ranch Road would be significant.

Mitigation for Significant Impact Nos. 3.3.3c and 3.3.3d: A six-foot high solid barrier shall be constructed on the southern property line of all Project lots that have a Montecito Ranch Road frontage prior to occupancy of lots 1 through 8, 119, 120, 144, 145, 148 through 166, 235 through 244, 250 through 260, 268 through 275, 376, 377, 389 through 397, 398 through 400, and 412 through 425. The barrier's weight must be at least 3.5 pounds per s.f. of face area and have no decorative cutouts or line-of-sight openings between the houses and Montecito Ranch Road. All gaps (except for weep holes) shall be filled with grout or caulking. The barrier may be constructed using one of the following alternative materials: (1) masonry block; (2) stucco veneer over wood framing (or foam core) or one-inch thick tongue and groove wood of sufficient weight per s.f.; (3) glass (0.25-inch thick) or other transparent material with sufficient weight per s.f.; (4) earthen berm; or (5) any combination of these construction materials.

On the Final Map, the Project Applicant shall grant to the County of San Diego a noise protection easement over the entire area of lots 1 through 8, 119, 120, 144, 145, 148 through 166, 235 through 244, 250 through 260, 268 through 275, 376, 377, 389 through 397, 398 through 400, and 412 through 425 inclusive of VTM 5020RPL⁶. This easement is for the mitigation of present and anticipated future noise levels on residential uses of the affected parcels. The easement shall require:

Prior to the issuance of any building permit for any residential use within the noise protection easement, the Project Applicant shall:

- Complete to the satisfaction of the Director of DPLU, an acoustical analysis performed by a County-approved acoustical engineer, demonstrating that the present and anticipated future noise levels for the interior and exterior of the residential dwelling will not exceed the allowable sound level limit of the Noise Element of the General Plan (60 dB[A] CNEL exterior and 45 dB[A] CNEL interior) and the RCP (55 dB[A] CNEL exterior). Future traffic noise level estimates for Montecito Ranch Road must utilize an LOS C traffic flow for a rural light collector road classification, which is the designated General Plan Circulation Element buildout roadway classification.
- Incorporate to the satisfaction of the Director of DPLU all of the recommendations or mitigation measures of the acoustical analysis into the project design and building plans.

Rationale: The goals of the Noise Ordinance are to control disturbing, offensive and excessive noise, provide an environment in which noise is not detrimental to life, health and enjoyment of property, and "secure and promote the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants" (County Code sections

36.401(b), (d) and (e)). The Noise Element likewise is designed to protect noise sensitive land uses from harmful noise. Compliance with the standards and criteria of the Noise Ordinance and the Noise Element will mitigate potential environmental impacts resulting from noise. Implementation of these mitigation measures would reduce Project operation noise levels at on-site residential properties to less than the County Noise Ordinance standard of 60 dB(A) CNEL for exterior and 45 dB(A) CNEL for interior because the above exterior/interior noise study will be required as a condition of the Tentative Map. If subsequent impacts are identified for a second story, a Title 24 study will identify building elements to control interior noise to the 45 dB(A) CNEL. Typically these elements include enhanced glazing and/or enhanced residential shell walls. With implementation of this mitigation, the identified impacts would be reduced to less than significant levels.

Significant Impact No. 3.3.3e: Significant exterior noise impacts are anticipated to occur at two residences located along Montecito Way.

Mitigation for Significant Impact No. 3.3.3e: Four-foot high solid noise walls shall be placed on private property in front of the two houses that would be significantly impacted by traffic noise prior to or during the construction of proposed improvements along Montecito Way (refer to Figure 3.3-2 for wall locations). If an agreement cannot be reached between the Applicant and the affected property owners, the noise walls shall be constructed within the right-of-way along Montecito Way or the roadway will be paved with rubberized asphalt in front of the homes and extending 300 feet north and south beyond the homes. If walls are constructed, the northernmost wall will be approximately 90 feet long and the southernmost wall will be 80 feet long. The barrier's weight must be at least 3.5 pounds per s.f. of face area and have no decorative cutouts or line-of-sight openings between the houses and Montecito Way. All gaps (except for weep holes) shall be filled with grout or caulking. The barrier may be constructed using one of the following alternative materials: (1) masonry block; (2) stucco veneer over wood framing (or foam core) or one-inch thick tongue and groove wood of sufficient weight per s.f.; (3) glass (0.25-inch thick) or other transparent material with sufficient weight per s.f.; (4) earthen berm; or (5) any combination of these construction materials.

Rationale: The goals of the Noise Ordinance are to control disturbing, offensive and excessive noise, provide an environment in which noise is not detrimental to life, health and enjoyment of property, and "secure and promote the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants" (County Code sections 36.401(b), (d) and (e)). The Noise Element likewise is designed to protect noise sensitive land uses from harmful noise. Compliance with the standards and criteria of the Noise Ordinance and the Noise Element will mitigate potential environmental impacts resulting from noise. Implementation of this mitigation measure would reduce Project operation noise levels at off-site existing residential properties to less than the County Noise Ordinance standard of 60 dB(A) CNEL for exterior via rubberized asphalt (as the majority of automotive noise is generated by tires and softer asphalts reduces noise generation) or sound walls (because breaking the line of sight from the noise source reduces received noise by 5 to 15 dB[A]). With implementation of this mitigation, the identified impact would be reduced to a less than significant level.

Significant Impact No. 3.3.3f: Significant exterior and interior noise impacts to adjacent residences would occur due to the proximity of the emergency generators of the two sewer pump stations within the proposed residential development.

Mitigation for Significant Impact No. 3.3.3f: The pump station emergency generators (required under both Wastewater Management Options 1 and 2) shall be located in a cinder-block building that utilizes acoustical louvers to decrease the noise level at the adjacent residential property lines. The louvers shall be placed on the vent openings on the northern side of the building. The sides of the

building facing east, south, and west are required to be completely free of any openings or ventilation.

Once construction of the pump stations is completed and the pump stations are fully operational, a site-specific analysis shall be prepared to determine if additional measures are required to meet the property line noise standards.

Rationale: The goals of the Noise Ordinance are to control disturbing, offensive and excessive noise, provide an environment in which noise is not detrimental to life, health and enjoyment of property, and “secure and promote the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants” (County Code sections 36.401(b), (d) and (e)). The Noise Element likewise is designed to protect noise sensitive land uses from harmful noise. Compliance with the standards and criteria of the Noise Ordinance and the Noise Element will mitigate potential environmental impacts resulting from noise. Implementation of this mitigation measure would reduce Project operation noise levels at on-site residential properties to less than the County Noise Ordinance standard of 60 dB(A) CNEL for exterior and 45 dB(A) CNEL for interior because the above exterior/interior noise study will be required. If subsequent impacts are identified, a Title 24 study will identify building elements to control interior noise to the 45 dB(A) CNEL (e.g., thicker walls at the pump station). With implementation of this mitigation, the identified impact would be a reduced to less than significant level.

Significant Impact No. 3.3.3g: The proposed aboveground water booster pump station and surge tank at the northwestern corner of the Montecito Way/Montecito Road intersection may potentially result in significant exterior noise impacts to the closest residence.

Mitigation for Significant Impact No. 3.3.3g: Prior to operation of the water booster pump station at the intersection of Montecito Way/Montecito Road, a qualified acoustician shall verify that the emergency generator designs feature setbacks, quieter equipment, noise-attenuating enclosures, and/or reduced test times to prevent the daytime residential standard of 50 dB(A) L_{eq} from being exceeded. If necessary, additional architectural features shall be provided to reduce noise (e.g., thicker walls).

Rationale: The goals of the Noise Ordinance are to control disturbing, offensive and excessive noise, provide an environment in which noise is not detrimental to life, health and enjoyment of property, and “secure and promote the public health, comfort, convenience, safety, welfare, prosperity, peace and quiet of the County of San Diego and its inhabitants” (County Code sections 36.401(b), (d) and (e)). The Noise Element likewise is designed to protect noise sensitive land uses from harmful noise. Compliance with the standards and criteria of the Noise Ordinance and the Noise Element will mitigate potential environmental impacts resulting from noise. Implementation of this mitigation measure would reduce Project operation noise levels at off-site residential properties to less than the County Noise Ordinance standard of 60 dB(A) CNEL for exterior because a noise study will be required to determine if impacts would occur to off-site residences. If subsequent impacts are identified, necessary building elements to control noise levels (i.e., setback, thicker walls or specific equipment type) will be required. With implementation of this mitigation, the identified impact would be a reduced to less than significant level.

F. Cultural Resources (Subchapter 3.4 of the EIR)

Significant Impact No. 3.4.3a: Significant direct impacts to site SDI-12,506 would include ground-disturbing activities related to development of residential pads and fire protection zones.

Mitigation for Significant Impact No. 3.4.3a: In summary, mitigation for direct impacts to site SDI-12,506 shall include preparing and executing a data recovery plan for the site, which will include implementation of an approved research design plan, focusing on site mapping, diagnostic surface artifact collection, and subsurface data recovery excavation. Field work shall be undertaken upon approval of the research design by DPLU archaeological staff. Field work also shall be coordinated with local Kumeyaay, who expressed an interest in the Project. All cultural materials recovered during the data recovery mitigation phase will be combined with the materials recovered during the test phase and will be processed and curated according to current professional repository standards.

Rationale: Implementation of this mitigation measure would substantially lessen the significant impact because it would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved. The impacts would therefore be reduced to less than significant levels.

Significant Impact No. 3.4.3b: Impacts during on-site grading activities to any unknown cultural resources could potentially be significant.

Mitigation for Significant Impact No. 3.4.3b: In summary, direct impacts to buried, previously unrecorded, cultural resources shall be mitigated through the execution of a grading monitoring program. An adequate number of County-approved archaeologists and Native American monitors shall be contracted to implement a grading monitoring and data recovery program to the satisfaction of the DPLU Director. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on site full-time to perform full-time monitoring of the excavations. In the event that previously unidentified potentially significant cultural resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. If any human bones are discovered, the Principal Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated, and a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed.

Rationale: Mitigation measures discussed above would reduce potential impacts to unknown buried on-site CEQA- and/or RPO-significant cultural sites during grading activities. The mitigation would ensure that the archaeological monitor has the authority to halt or divert grading or excavation activity in the area of any discovery. Implementation of this mitigation measure would substantially lessen the significant impact, because it would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved, as well as ensuring that appropriate coordination with MLDs and repatriation of remains, as appropriate and necessary, has occurred. The impacts would therefore be reduced to less than significant levels.

Significant Impact No. 3.4.3c: If subsurface cultural resources were to be encountered during construction of the equestrian staging area, potentially significant impacts could occur to such resources.

Mitigation for Significant Impact No. 3.4.3c: Test excavations shall be completed prior to construction of the equestrian improvements to confirm the surface assessment that no cultural

resources are located in the area. If resources are discovered, the procedures listed in Mitigation for Significant Impact No. 3.4.3b would be implemented to ensure proper handling of such resources.

Rationale: Impacts would be reduced to less than significant levels through implementation of mitigation in the form of performing subsurface excavations prior to construction of the equestrian amenities. The mitigation also ensures that the archaeological monitor has the authority to halt or divert grading or excavation activity in the area of any discovery. Implementation of this mitigation measure would substantially lessen the significant impact, because it would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved, as well as ensuring that appropriate coordination with MLDs and repatriation of remains, as appropriate and necessary, has occurred.

Significant Impact No. 3.4.3d: Depending on the ultimate use of the Montecito Ranch House, there is the potential for significant indirect impacts to the house and its visual setting over time.

Mitigation for Significant Impact No. 3.4.3d: In summary, an Historical Preservation Plan has been prepared and would be implemented for the preservation and maintenance of the Montecito Ranch House. The Montecito Ranch Historic Complex (SDI-12,476H) shall be preserved and maintained by the County or cooperating group. An Historic Structures Evaluation shall be completed that includes lead-based paint and asbestos evaluation. The historic buildings will be used in a manner consistent with their historic character and maintained in accordance with the Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" and Secretary of the Interior Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" and the California State Historic Building Code. Any ground disturbing activities, such as landscape and/or hardscape installation, utility upgrades, driveway improvements, or equestrian facility improvements shall be reviewed for potential impacts by a qualified archaeologist who meets Secretary of the Interior Standards. Funds for the management and maintenance of the Montecito Ranch House shall be procured through the LMD. In addition, the Project Applicant shall prepare and submit to the County Historic Site Board an application for Landmark Designation in accordance with Ordinance 9493 (Local Register of Historical Resources adopted August 14, 2002) for the Montecito Ranch House and surrounding landscape.

Rationale: Development and dedication of the 11.9-acre historic park site surrounding the Ranch House would ensure that the visual setting of the historic structure would remain intact. Although the historic park site would include an equestrian staging area, this facility would be consistent with the rural, historic setting. Implementation of this mitigation would avoid or substantially lessen the significant impact, because it ensures that the future setting of the Ranch House would retain space between the house and off-site uses and would contain historical references. Procured funding through the LMD would ensure appropriate long-term maintenance of the Ranch House because the District has the ability to identify maintenance needs on an ongoing basis and assess greater or lesser amounts as necessary. Potential indirect impacts to the historic park based on modification of the structure setting would be mitigated to less than significant levels.

Significant Impact No. 3.4.3e: Potential significant indirect impacts to 13 cultural sites (CA-SDI-12,473, CA-SDI-12,474, CA-SDI-CA-SDI-12,475, CA-SDI-12,480, CA-SDI-12,481, CA-SDI-12,484H, CA-SDI-12,486, CA-SDI-12,489, CA-SDI-12,494, CA-SDI-12,496, CA-SDI-12,497, CA-SDI-12.498, and P-37-024282) within the Project site may occur.

Mitigation for Significant Impact No. 3.4.3e: In summary, mitigation would include monitoring during grading and construction activities and implementation of an RMP. The remaining 13

archaeological sites shall be placed within dedicated open space and shall be monitored throughout the development process. Allowable ground disturbing activities shall be limited to archaeological excavations guided by an archaeological research design approved by the County of San Diego. Any proposed archaeological research program should include provision for curation of collections and records. The required RMP for the Montecito Ranch development shall be prepared and shall include measures to deter vandalism of the sites. To ensure that no inadvertent impacts to archaeological sites occur post-construction, the following activities shall not be allowed within 100 feet of any archaeological site boundary: brush clearing, vegetation thinning, future trail development, or use of any type of mechanical equipment in the event of a brush fire or for any other purpose. Active measures for protection will be implemented as development proceeds, including rustic fencing to be placed periodically along road and trail alignments to protect natural and cultural resources. Interpretive signage shall be placed at trailheads to advise trail users of the cultural sensitivity of the area. An agency archaeologist should provide scheduled monitoring of archaeological sites.

Rationale: This mitigation would be adequate because monitoring would ensure that the sites are not disturbed during grading and construction activities, as equipment would be restricted to areas beyond site boundaries and construction workers would be advised to stay away from sites. After construction, trail users and other visitors to the area also could attempt to collect cultural materials or inadvertently disturb sites. Implementation of the RMP would ensure that post-construction activities would be restricted, as trails would be located at a minimum of 100 feet from sites, and trail users would be informed of the sensitivity of the areas and legal penalties for resource disturbance. These constraints would support keeping individuals from intentionally or inadvertently disturbing the site, thereby contributing to retention of the current state of preservation. In addition, it is anticipated that the dense vegetation on site would protect the cultural sites from vandalism. Potential indirect impacts to preserved cultural resources within on-site open space would be mitigated to less than significant levels.

Significant Impact No. 3.4.3f: Given the presence of archaeological and historic resources in the vicinity, currently unknown resources could be encountered during off-site road grading. Impacts to any unknown cultural resources could potentially be significant.

Mitigation for Significant Impact No. 3.4.3f: Direct impacts to buried, previously unrecorded, cultural resources for off-site improvements shall be mitigated through the execution of a grading monitoring program. A qualified cultural resource monitor shall be present during grading for proposed off-site roadway and utility improvements, including along Montecito Way in the vicinity of previously recorded sites and where surface visibility was poor during the survey, as discussed under Mitigation for Significant Impact No. 3.4.3b and the Archaeological Resources Review, Impact Assessment, and Preservation Plan (Appendix G), to prevent impacts to any unknown resources (including buried resources).

Rationale: Mitigation measures discussed above would reduce potential impacts to unknown buried off-site CEQA- and/or RPO-significant cultural sites during grading activities. The mitigation would ensure that the archaeological monitor has the authority to halt or divert grading or excavation activity in the area of any discovery. Implementation of this mitigation measure would substantially lessen the significant impact, because it would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved. The impacts would therefore be reduced to less than significant levels.

Significant Impact No. 3.4.3g: The proposed roadway improvements to Montecito Way and subsequent increased traffic along this roadway may result in potentially significant indirect impacts to the rural setting along the portion of Montecito Way containing historic structures.

Mitigation for Significant Impact No. 3.4.3g: Mitigation in the form of appropriate right-of-way improvements along this roadway segment shall be implemented to complement the setting, such as historically appropriate fencing and/or landscaping.

Rationale: To reduce potential indirect impacts to the rural setting of historic structures (e.g., houses and a barn) along Montecito Way, improvements within the right-of-way would be designed to complement the setting (e.g., historically appropriate fencing and/or landscaping). Implementation of this mitigation would avoid or substantially lessen this indirect impact, because it ensures that the existing historical setting of the roadway would still contain historical references. The potential impacts would therefore be reduced to less than significant levels.

Significant Impact No. 3.4.3h: Potentially significant impacts, including modification or removal, could occur to the Montecito Road Bridge.

Mitigation for Significant Impact No. 3.4.3h: The Montecito Road Bridge shall be recorded on DPR 523 Resource Record Forms, including appropriate photographs and drawings as documentation.

Rationale: Potentially significant impacts to the Montecito Road impacts would be mitigated by appropriate recordation of the bridge prior to disturbance, as determined in the Cultural Resources Review for Proposed Off-site Improvements (Appendix G of the EIR). This would ensure that any historical engineering data relevant to an understanding of the local or regional history would be documented, and therefore preserved for research purposes. The potential impacts would therefore be reduced to less than significant levels.

G. Aesthetics (Subchapter 3.5 of the EIR)

Significant Impact No. 3.5.3a: Short-term visual impacts along Montecito Way would be adverse and significant due to the approximate visual doubling of the existing pavement width (from 24 feet to 40 feet) and the addition of noise walls.

Mitigation for Significant Impact No. 3.5.3a: Following improvements to Montecito Way, the sides of the roadway shall be planted with trees and shrubs similar to what is currently present along the roadway. Trees will be planted with 24-inch container boxes and are anticipated to initially be approximately 12 to 15 feet in height. The trees have a growth rate of up to three feet per year. Tree species will include, but not be limited to eucalyptus (*Eucalyptus* spp.), Brisbane box tree (*Tristania converta*), coast live oak (*Quercus agrifolia*), and California pepper (*Schinus molle*). Trees will be spaced randomly along the roadway approximately every 30 to 40 feet. Shrubs will be used to screen the understory of the trees. Shrubs will be planted from five-gallon containers and would grow up to approximately two feet per year. Shrub species will include, but not be limited to, toyon (*Heteromeles arbutifolia*), manzanita (*Arctostaphylos* spp.), agave (*Agave* spp.), and lantana (*Lantana* sp.).

Screening vegetation (similar to that discussed above) shall be planted in front of the noise walls along Montecito Way.

Rationale: Screening plants similar to what is currently along the roadway would be installed following the removal of existing vegetation and implementation of roadway improvements. Upon maturity, this new vegetation would both provide similar coverage to what is currently present along

the roadway and screen the noise walls. This would be effective in mitigating the near-term community character impacts to less than significant levels.

III. PROJECT ALTERNATIVES

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of “a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Five alternatives to the Proposed Project were analyzed, including the No Project–No Development Alternative, No Project–Development Per Legal Parcels Alternative, Reduced Development Footprint Alternative, Reduced Density Alternative, and Closed Water System Alternative. These alternatives are compared to the impacts of the Proposed Project and are assessed relative to their ability to meet the basic objectives of the Proposed Project. In addition, a number of alternatives were considered and rejected, as described in Section 5.8 of the FEIR, pursuant to CEQA Guidelines Section 15126.6(c).

The following provides a summary of each alternative fully analyzed in Chapter 5.0 of the FEIR, as well as a rationale as to why the Proposed Project is preferred over each alternative and why each alternative has been rejected.

A. NO PROJECT–NO DEVELOPMENT ALTERNATIVE

1. Alternative Description

The No Project–No Development Alternative (refer to Subchapter 5.2 of the EIR) assumes that the Project site continues in an undeveloped state over the long-term, with portions of the site under agricultural use. Such uses would be allowed outside of the mitigation area for past farming activities on site; approximately 220.5 acres of open space in the westernmost portion of the SPA has been set aside as mitigation. Under the No Project–No Development Alternative, the Project site would remain in its current condition of native and non-native habitats, with the potential for continued dry farming of oat hay and/or cattle grazing. The 617.1 acres of native habitat throughout the site would remain, as would agricultural support facilities and service roads. The Proposed Project would not be constructed, including supporting infrastructure (i.e., roadways and utilities connections), nor would the proposed local park site, equestrian staging area, or open space preserve areas be created. Additionally, the historic Montecito Ranch House would not be dedicated within an historic park site and would remain on site in its current condition.

2. Rationale for Preference of the Proposed Project Over the Alternative

Under the No Project–No Development Alternative, Montecito Ranch Road would not be constructed, and the associated traffic impacts and benefits would not be realized. Intersection improvements would not be made to Ash Street/Pine Street, Main Street/Pine Street, Montecito Road/Main Street, Montecito Road/Montecito Way, SR 67/Highland Valley Road/Dye Road, and SR 67/Archie Moore Road. Unlike the Proposed Project, the No Project–No Development Alternative would not potentially upgrade the existing signal at the intersection of Pine Street/Olive Street. Many of the improvements identified as Project mitigation are needed today, and other sources of funds to initiate these improvements would need to be identified.

Continued agricultural use of the site would have some indirect biological resources impacts associated with noise impacts to gnatcatchers and other wildlife, as well as potential soil erosion impacts on adjacent habitats.

The No Project–No Development Alternative would potentially allow continued degradation of existing cultural resource sites due to ongoing agricultural activity within permitted areas and would not preserve the historic Montecito Ranch House within an historic park site. The Ranch House would remain on site in its current condition, and would not be preserved or maintained by the County or cooperating group.

It is possible that new agricultural activity would occur on site under the No Project–No Development Alternative following complete implementation of the mitigation agreement for past farming on site. This would result in views of agricultural activities from some existing homes near the Project site.

Although the No Project–No Development Alternative is environmentally superior to the Proposed Project because it would avoid the near-term environmental impacts associated with the Proposed Project, agricultural activities may occur on site under this alternative, which also would result in continued adverse environmental impacts, as described above. This alternative would result in less than significant or no impacts to traffic, air quality, land use, biological resources, noise, cultural resources and aesthetics, whereas the Proposed Project would result in significant impacts to all of these environmental issues (refer to pages 5-3 through 5-6 of the Final EIR). This alternative also would not develop housing on the Specific Planning Area (SPA), which is the land use specified in the Ramona Community Plan (RCP) for the Montecito Ranch SPA. The No Project–No Development Alternative would not meet any of the Project objectives, including: (1) development of a residential project (Objectives 1, 3, and 9); (2) permanent preservation of large contiguous blocks of open space/sensitive natural resources and the viewshed for the County Scenic Highway portion of SR 78 (Objectives 2, 4, and 5); (3) provision of the “loop road” system around downtown Ramona (Objective 6); and (4) preservation of the Montecito Ranch House as an historical park site, development of a local park, and dedication of land for trails (Objectives 2, 7, and 8). Therefore, the No Project–No Development Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

B. NO PROJECT– DEVELOPMENT PER LEGAL PARCELS ALTERNATIVE

1. Alternative Description

The No Project–Development Per Legal Parcels Alternative (refer to Subchapter 5.3 of the EIR) assumes that the existing legal parcels within the Montecito Ranch SPA would gradually develop via a series of applications from separate property owners according to the existing zoning for the site. Based on existing zoning, this could result in development of an estimated maximum of 196 single-family residential units on minimum two- to four-acre lots, on a total of 637.7 acres. Dedication of an historical park site containing the Montecito Ranch House would likely be required under this alternative, as this would be a requirement of any proposed development during the entitlement process. Topographical constraints were considered during the drawing of this conceptual plan, with lots containing steep slopes assumed to be a minimum of four acres. This alternative would not include a local park or equestrian staging area, and would likely result in less on-site open space than the Proposed Project (i.e., approximately 273 acres under this alternative versus a minimum of 573.8 acres under the Proposed Project). It is assumed that no off-site roadway improvements would be built as part of this alternative; each smaller development would likely pay a fair share toward the improvement of impacted roadways and intersections. The properties would use water wells and septic systems; therefore, this alternative would not include extension of an off-site sewer line (Wastewater Management Option 1) or construction of an on-site wastewater reclamation facility (WRF) (Option 2). The off-site water storage tank and associated pipeline, access road, and water booster pump station associated with the Proposed Project also would not be implemented under this alternative.

2. Rationale for Preference of the Proposed Project Over the Alternative

Although this alternative would result in a 59 percent reduction in the total number of vehicle trips, this reduction would not be expected to substantially alter the Project-related and cumulative traffic impact analysis and associated mitigation requirements compared with the Proposed Project, because several roadways and intersections are already operating at LOS E or F under existing conditions. Traffic impacts associated with this alternative would be less than those associated with the Proposed Project (2,412 versus 5,885 trips), but would remain significant and unmitigable.

Short-term construction-related air quality impacts associated with the No Project–Development Per Legal Parcels Alternative would be less than those associated with the Proposed Project, because of the reduced amount of earth movement associated with this alternative due to the reduction in homes and the elimination of the local park site. In addition, it is unlikely that all of the residential lots would be graded and built out at the same time, with smaller daily emissions expected to be stretched over a longer period of time. Accordingly, short-term construction impacts would be less than significant. With regard to implementation, because this alternative would generate less traffic, associated operational air quality impacts would be reduced as well when compared to the Proposed Project.

With regard to land use and planning, although each development under this alternative would be required to comply with the RCP, Resource Protection Ordinance (RPO), and other County land use requirements, there is also the potential under this alternative for conflicts with these requirements to occur. Like the Proposed Project, without mitigation this alternative may conflict with the Noise Element of the RCP, which recommends land use and circulation patterns that would minimize noise in residential neighborhoods. SA 603 would be built in some configuration through the SPA, possibly along an alignment similar to the Proposed Project's Montecito Ranch Road. Mitigation in the form of a noise protection easement along segments of SA 603 and Montecito Way may be required, as for the Proposed Project. With mitigation, impacts associated with this RCP inconsistency would be less than significant for this alternative and for the Proposed Project. It should also be noted that the Circulation Plan shows SA 603 being extended through the SPA westerly from existing Cedar Street, which has more houses closer to the road than Ash Street, where the Proposed Project would connect. Impacts associated with land use and planning would be significant under this alternative, but the impacts would be less than those associated with the Proposed Project.

Implementation of this alternative would be expected to result in greater impacts to biological resources than the Proposed Project. Based on the conceptual plan, up to approximately 662 acres of habitat would be impacted versus 394.69 acres for the Proposed Project. This alternative would be expected to impact more of each habitat, including much of the oak woodlands on the site. More than twice as much Diegan coastal sage scrub would be impacted and nine coastal California gnatcatchers could be directly affected. Additional impacts to jurisdictional areas would occur on site. The No Project–Development Per Legal Parcels Alternative, when compared to the Proposed Project, would designate smaller contiguous blocks of habitat within open space, as well as preserve a smaller area of the site within open space. Indirect impacts due to human and pet encroachment into designated open space within the SPA would be slightly reduced under this alternative, based on fewer residents/pets, but a correspondingly smaller remaining habitat area. In addition, the development footprint of this alternative would encroach into the proposed MSCP hardline preserve area.

With regard to implementation, because the No Project–Development Per Legal Parcels Alternative would generate less traffic, associated noise impacts would be less as well when compared to the Proposed Project. Off-site traffic noise impacts would, however, depend on actual traffic patterns created by gradual on-site development by several developers, including future points of access to the new

developments. If Cedar Street were to become the primary access to the site, impacts to residents along this street could be significant because homes are relatively close to the roadway. Under this alternative, no off-site roadway widening and associated construction noise would occur along Ash Street, Montecito Way, and Montecito Road. This alternative would not include installation of sewer or water pump stations, and, thus associated noise impacts would not occur.

Under the preliminary design of the No Project–Development Per Legal Parcels Alternative, 7 of the 15 cultural resource sites within the Project site that were determined to be CEQA-significant could potentially be impacted. The CEQA significant sites that could potentially be directly impacted by this alternative would include: SDI-12,469, SDI-12,480, SDI-12,489, SDI-12,494, SDI-12,497, SDI-12,498, and SDI-12,506. (Two sites, SDI-12,481 and P-37-024282, are both CEQA significant and also are addressed under the RPO. Because site SDI-12,481 is RPO-significant and site P-37-024282 is potentially RPO-significant, these two sites would be avoided during buildout under this alternative.) Actual direct impacts within the Project site would depend on future specific development plans under this alternative. It should be noted, however, that any cultural resource sites that are preserved under this alternative would be located within smaller, less contiguous blocks of preserve land, compared to the Proposed Project and would likely be subject to greater indirect impacts from human intrusion as a result. Overall, this alternative is expected to result in greater impacts to cultural resources than the Proposed Project.

Although the No Project–Development Per Legal Parcels Alternative would consist of a less intense development, which would provide for larger residential lots that would be more representative of existing development patterns in the general Project site area, development of this alternative would not provide the large contiguous open space areas afforded by the Proposed Project. Accordingly, this alternative would not comply with some of the land use conditions and policies with which the Proposed Project would comply. Areas that would be preserved in open space under the Proposed Project providing visual amenity would be subject to development and would not be included in dedicated open space under this alternative. Impacts associated with aesthetics would be significant under this alternative, but the impacts would be less than those associated with the Proposed Project.

In summary, this alternative would generally conform with the minimum lot sizes specified in the RCP and would result in slightly reduced impacts related to air quality, transportation/circulation, noise, and aesthetics, compared to the Proposed Project. Because of the larger lot sizes associated with this alternative, agricultural operations would be more likely to occur. The No Project–Development Per Legal Parcels Alternative would be expected to result in substantially greater impacts to biological resources and an increased likelihood of adverse impacts to cultural resources compared to the Proposed Project. The No Project–Development Per Legal Parcels Alternative would result in permanent preservation of a smaller portion of the site and the preserve land would be more fragmented. This would result in greater direct and indirect impacts to sensitive habitats, such as oak woodlands and Diegan coastal sage scrub, and the sensitive species that are present within these habitats, such as the coastal California gnatcatcher. This alternative would be expected to directly impact a greater number (7) of the 15 CEQA-significant historic and archaeological sites as compared to the Proposed Project, which would impact 1 of these sites. Therefore, the No Project–Development Per Legal Parcels Alternative is not considered to be environmentally superior to the Proposed Project, based on its substantially greater impacts to biological and cultural resources. In addition, while this alternative would contribute funds toward the future development of schools, parks, and substantial off-site road improvements, it would not dedicate and develop a park site, nor implement substantial off-site road improvements, such as those included as part of the Proposed Project. The No Project–Development Per Legal Parcels Alternative also would not meet any of the Project objectives, except the preservation of Montecito Ranch as an historical park site (Objective 7). Therefore, the No Project–Development Per Legal Parcels Alternative has been

rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

C. REDUCED DEVELOPMENT FOOTPRINT ALTERNATIVE

1. Alternative Description

The Reduced Development Footprint Alternative (refer to Subchapter 5.4 of the EIR) would include 417 single-family residential units on minimum 10,000-square foot (s.f.) lots. In addition, this alternative would retain the same park sites, equestrian staging area, and WRF (under Wastewater Management Option 2) as the Proposed Project. Because this alternative would have a smaller residential development footprint, more open space would be provided than under the Proposed Project. This alternative would provide the same multi-purpose trail system as defined for the Proposed Project. All off-site roadway and utility improvements under this alternative would be the same as those described for the Proposed Project.

The residential development within the SPA would encompass approximately 193.6 acres under this alternative, while approximately 684.3 acres (73.1 percent of the site) would be designated as open space under Wastewater Management Option 1. Under Option 2, this alternative would dedicate 659.6 acres (70.5 percent of the site) as open space. Open space easements would encompass areas such as steep slopes, sensitive biological habitats, important archaeological resources, buffers and other environmentally sensitive areas to create viable wildlife corridors and linkages, with no development permitted in the open space easements.

2. Rationale for Preference of the Proposed Project Over the Alternative

The Reduced Development Footprint Alternative would not reduce traffic impacts associated with the Proposed Project due to the same number of proposed residential units. Impacts to roadway segments would remain significant and unmitigated, as with the Proposed Project.

Although the Reduced Development Footprint Alternative would be expected to result in reduced short-term construction-related air quality impacts compared to the Proposed Project because of the smaller graded area and likely reduced amount of earth movement associated with this alternative, significant and unmitigable project-related and cumulative impacts would be anticipated with respect to short-term construction emissions due to the same number of proposed houses that would need to be constructed and painted.

The Reduced Development Footprint Alternative would result in similar plan conformance, land use compatibility, and community character impacts as the Proposed Project. This alternative would require amendments to the same conditions and policies as the Proposed Project. Significant impacts to community character would be more substantial than those associated with the Proposed Project, due to the smaller lot sizes under this alternative. Due to the smaller lot size, the Reduced Development Footprint Alternative would be less compatible with the rural character of the community of Ramona and less consistent with surrounding development densities.

Although the Reduced Development Footprint Alternative would impact less on-site habitat than the Proposed Project, impacts to sensitive plant and animal species would be the same for this alternative and the Proposed Project, with the exception that the impacts to coastal California gnatcatcher would be slightly less under this alternative versus the Proposed Project due to the reduced area of impact to Diegan coastal sage scrub.

The Reduced Development Footprint Alternative would not reduce construction noise impacts associated with the Proposed Project. Due to the smaller lot sizes associated with this alternative, there would be less space within each lot adjacent to Montecito Ranch Road to allow for setbacks to reduce on-site operational noise impacts. Architectural treatments necessary to mitigate noise impacts to homes and outdoor usable space could be more substantial than for the Proposed Project. Additionally, the Reduced Development Footprint Alternative, like the Proposed Project, would result in significant impacts to two homes located along Montecito Way.

This alternative would not reduce impacts to off-site cultural resources, nor would it reduce indirect impacts to on-site cultural resources; all cultural resource sites under either the Proposed Project or this alternative would be subject to the same degree of indirect impacts (e.g., potential vandalism). Direct impacts to on-site cultural resources would be less because no cultural sites would be impacted by construction of this alternative (one would be impacted under the Proposed Project).

The Reduced Development Footprint Alternative would not reduce visual resources impacts associated with the Proposed Project. Significant short-term impacts resulting from widening Montecito Way and construction of two noise walls along Montecito Way would occur under this alternative, as well as the Proposed Project. Although reducing the development footprint of the residential uses would afford larger areas of contiguous open space, which would provide greater visual continuity with adjacent undeveloped areas, views into the residential development from off-site areas would capture a higher intensity development that would contrast more with the surrounding neighborhoods than the Proposed Project.

In summary, this alternative would result in similar impacts to air quality, transportation/circulation, and noise as the Proposed Project, because each scenario proposes development of 417 residential units. This alternative also would have similar impacts to land use and aesthetics, although the higher residential density would contrast more with the surrounding neighborhoods. Such an impact would be at least partially offset by enhanced landscaped treatments and/or berming and larger areas of contiguous open space. The Reduced Development Footprint Alternative would be inconsistent with the same conditions and policies as the Proposed Project. Cultural resources impacts would be less, as this alternative would not impact any of the cultural resources on site. The Reduced Development Footprint Alternative would decrease impacts to on-site habitats, compared to the Proposed Project. These reduced impacts to cultural and biological resources would be the primary environmental benefits of this alternative. Although overall environmental impacts under this alternative would be less than the Proposed Project, the greater development densities associated with this alternative are generally not consistent with the surrounding residential development within Ramona. In addition, this alternative would not reduce significant and unmitigable impacts to air quality (construction-related) and transportation/circulation (operational) to a mitigable level. This alternative would be consistent with some of the objectives of the Proposed Project, the Reduced Development Footprint Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

D. REDUCED DENSITY ALTERNATIVE

1. Alternative Description

The Reduced Density Alternative (refer to Subchapter 5.5 of the EIR) would develop 244 single-family residential units on minimum one-acre lots within the same residential development footprint as the Proposed Project. While the overall site density under this alternative would be lower than that identified for the Proposed Project, the development footprint and open space areas would be similar.

This alternative would provide the same amount of parkland as the Proposed Project, and would provide the same multi-purpose trail system and equestrian staging area as defined for the Proposed Project. On-site road improvements would be similar to those associated with the Proposed Project. Montecito Way would be widened between the project site and Montecito Road, and Ash Street would be widened between the project site and Pine Street. The widening of Montecito Road would not be required to support the traffic generated by this alternative, and the impacts to biological and cultural resources associated with this road improvement would not occur. The improved traffic service within the community that would be associated with these roadway improvements under the Proposed Project also would not occur under this alternative. This alternative would either have to be sustainable with groundwater wells and septic systems/leach fields on the one-acre lots, or the water and sewer improvements associated with the Proposed Project would have to be implemented under this alternative as well. The water storage tank would be reduced to accommodate the lower demand associated with this alternative. With a sewer system, at least two sewer pump stations would likely be required. Potential implementation of Wastewater Management Option 2, the WRF, under this alternative would need to be analyzed for cost effectiveness.

2. Rationale for Preference of the Proposed Project Over the Alternative

Although this alternative would result in a 41 percent reduction in the total number of vehicle trips, this reduction would not be expected to substantially alter the Project-related and cumulative traffic impact analysis and associated mitigation requirements, compared with the Proposed Project, because many roadways and intersections are already operating at LOS E or F under existing conditions. In addition, this alternative would provide a fair share of transportation system improvements, commensurate with the number of residential units to be built, and it would not be feasible for this smaller alternative to build as many improvements as would the Proposed Project.

Short-term construction-related air quality impacts associated with the Reduced Density Alternative for the grading phase of construction would be similar to those associated with the Proposed Project. Although grading for 244 residential pads instead of 417 could result in reduced earth movement associated with this alternative, each entire lot is assumed to be disturbed and improved because there is no regulation or prohibition against disturbance of the lots by the property owner. Therefore, the same amount of grading is assumed for both the Proposed Project and the Reduced Density Alternative. Emissions associated with residential construction would be reduced from emissions estimated for the Project due to the smaller number of residences. Although emissions associated with the Reduced Density Alternative would be less than those estimated for the Proposed Project, this alternative would still result in significant, unmitigable impacts related to short-term grading/construction.

The Reduced Density Alternative would not reduce land use compatibility and community character impacts associated with the Proposed Project. This alternative would require amendments to the same conditions and policies as the Proposed Project. This alternative also would result in significant impacts to community character, similar to the Proposed Project.

Direct biological resources impacts within the project site would be similar under the Reduced Density Alternative compared to the Proposed Project, because both development scenarios have the same development footprint within the project site. The reduction in ADT (less than 280 homes) generated by this alternative would eliminate the need to improve Montecito Road; therefore, direct impacts to riparian woodland due to off-site roadway improvements would be eliminated because Montecito Road widening, with its associated wetland impacts at the bridge crossing of Santa Maria Creek, would not occur. Indirect impacts due to human and pet encroachment into designated open space within the SPA could be slightly less under this alternative because 41 percent fewer residents and pets would be expected to

reside within the SPA. These indirect impacts would remain significant, but mitigable. Overall, biological resources impacts under this alternative would be reduced compared to the Proposed Project.

The Reduced Density Alternative would not reduce construction noise impacts associated with the Proposed Project. Although residential vehicle trip generation would be approximately 41 percent less for this alternative compared to the Proposed Project, which would result in a reduced contribution to long-term traffic noise in the area, significant impacts would still occur to two homes located along Montecito Way, as assessed for the Proposed Project due to the decibel level produced by this level of traffic. Overall, operational noise under this alternative would be slightly reduced compared to the Proposed Project.

Although indirect impacts to cultural sites, such as potential vandalism, could be slightly less under this alternative because there would be approximately 41 percent fewer residents within the SPA, the Reduced Density Alternative would not reduce direct cultural resources impacts associated with the Proposed Project because one cultural resource site is assessed to be directly impacted.

The Reduced Density Alternative would result in visual impacts similar to those identified for the Proposed Project. Significant short-term impacts resulting from widening Montecito Way and construction of two noise walls along Montecito Way would occur under this alternative, as they would under the Proposed Project. Short-term impacts to the Montecito Way viewshed would remain significant, but mitigable.

In summary, this alternative would result in reduced long-term impacts related to air quality, transportation/circulation, biological resources and noise. Nonetheless, short-term construction-related air quality impacts and long-term cumulative impacts to the roadway network under the Reduced Density Alternative would remain significant and unmitigable. This alternative would result in similar impacts to land use and cultural resources, compared to the Proposed Project. The Reduced Density Alternative would not be able to support traffic improvements that would alleviate traffic congestion in downtown Ramona (Objective 6). Therefore, the Reduced Density Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

E. CLOSED WATER SYSTEM ALTERNATIVE

1. Alternative Description

The Closed Water System Alternative (refer to Subchapter 5.6 of the EIR) design would be the same as the Proposed Project, except that the off-site water storage tank, and the associated pipeline and access road, would not be constructed. This alternative would include the development of 417 single-family residential units and would dedicate land for various public improvements including an historic park site (developed and including an equestrian staging area), local park site (fully developed), and open space (with trails) within the Project site. This alternative also would include the same two wastewater management design options as the Proposed Project, only one of which would be implemented. This alternative would replace the need for a water tank by providing a pumping system as opposed to a gravity system for operation. The water line connections to the Project site and the water booster pump station south of the Montecito Way/Montecito Road intersection would still be required, and the booster pump station would be expanded to include an underground holding/surge tank on the 10,000 square foot lot. The additional water pumps at the Olive Street Pump Station also would still be required.

2. Rationale for Preference of the Proposed Project Over the Alternative

The Closed Water System Alternative would not reduce traffic and air quality impacts associated with the Proposed Project. Such impacts would remain significant and unmitigated. In addition, this alternative would not reduce land use compatibility, community character, construction and vehicle noise, and cultural resources impacts associated with the Proposed Project. Noises associated with the Montecito Way/Montecito Road water booster pump station would still occur under this alternative and would be slightly increased due to the inclusion of a surge tank. The Closed Water System Alternative would, however, result in fewer impacts associated with plan conformance, as no water tank or associated access road would be constructed along a ridgeline and no impacts to natural landforms would occur. Although impacts to Diegan coastal sage scrub and non-native grassland would be slightly less under the Closed Water System Alternative than the Proposed Project (a difference of 2.2 acres overall), impacts to sensitive species would remain the same. No additional visual impacts would occur due to the addition of the underground holding/surge tank at the Montecito Way/Montecito Road water booster pump station.

The Closed Water System Alternative would meet all of the objectives of the Proposed Project. Although (excluding noise) overall impacts under this alternative would be slightly less than the Proposed Project, this alternative was not pursued as a part of the Project because the construction of a water storage tank is preferred by the Ramona Municipal Water District, which has jurisdiction over the subject facilities. In fact, the District will not accept the Closed Water System Alternative as the long-term permanent facility. Therefore, the Closed Water System Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

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STATEMENT OF OVERRIDING CONSIDERATIONS

MONTECITO RANCH

**SP01-001; VTM 5250RPL⁶; P04-045; P09-023; GPA 04-013; R04-022; STP 08-019;
ER 09-013; Log No. 01-09-013
SCH No. 2002021132**

August 4, 2010

Background

Pursuant to Section 21081 of the California Environmental Quality Act (CEQA) and Section 15091 of the State CEQA Guidelines, the Board of Supervisors found that mitigation for the Project's direct traffic impacts to segments of SR 78 from Haverford Road to H Street (Significant Impact No. 2.1.3a) and SR 67 from Hunter Street to Poway Road (Significant Impact No. 2.1.3b) would be infeasible. To fully alleviate the impacts to these two roadways, SR 78 would need to be widened to four lanes for a length of 2.0 miles and SR 67 would need to be widened to four lanes for a length of 9.5 miles. The resolution of existing and projected deficient service capacities along both of these regional arterials, which are designated state highways, within the jurisdiction of Caltrans, must occur on a regional level. These improvements would require extensive conversion of existing land uses beyond the purview/ability of a private applicant and require regional highway improvements of a magnitude and scope disproportionate to the Project. Moreover, the Project would contribute less than 1% of the traffic to these two roadways. The County does not currently intend to convert existing uses abutting these roadways due to the pedestrian-friendly downtown Ramona area, historic structures, and the presence of heritage eucalyptus trees along SR 67. Although for purposes of the County's approval of the Project, the impacts remain significant and unmitigated, impacts to these roadways segments would be partially mitigated by implementation of required intersection mitigation measures. This is because intersections create choke points along a roadway, and intersection improvements facilitate better traffic flow overall as a result of better flow through the improved intersection. Widening of smaller segments of the roadway would not alleviate the existing deficiency within this road segment. The resolution of the existing and projected inadequate service capacities along these regional arterials, which are designated as state highways and within the jurisdiction of Caltrans, must occur on a regional level. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Maplevue Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the RTIP as an engineering study. However, there is no regional funding program in place for improvements to the remainder of the road way segment (SR 67 from Highland Valley Road/Dye Road to Hunter Street) or for SR 78. Therefore, the mitigation is within the responsibility and jurisdiction of another government agency and can and should be adopted by that other agency, and specific economic, legal and social considerations otherwise render full mitigation infeasible. (Public Resources Code Section 21081(a)(2) and (3).)

In addition, the Board of Supervisors found that mitigation for the Project's temporarily significant air quality impact during construction with respect to volatile organic compounds (VOC) emissions is infeasible. In order to mitigate temporary project-direct air quality impacts related to VOC emissions to less than significant levels, the Project would be required to paint less than one house per day. Where possible, the Project has incorporated use of low-VOC coatings that meet the requirements of Air Pollution Control District (APCD) Rule 67.0 as a matter of Project design; coatings generally would be water-based and typically meet a VOC content of 150 grams per liter or less, except for specialty coatings that may be needed in minor amounts on trim. Implementation of this design consideration alone, however, would not reduce potential impacts to less than significant levels. Implementation of the mitigation measure noted above, which would stretch residential painting over a period of approximately two years, is considered infeasible for these temporary effects (i.e., it is not capable of being accomplished within a reasonable period of time, taking into account economic and technological factors), and there is no additional feasible mitigation to effectively reduce short-term VOC impacts related to architectural coatings to below a level of significance. Therefore, for purposes of the County's approval of the project the impact remains significant and unmitigated on a temporary basis.

Pursuant to Section 15093 of the State CEQA Guidelines, when the lead agency approves a project that may result in the occurrence of significant effects that are identified in the Final Environmental Impact Report (EIR), but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record.

Statement of Overriding Considerations

The Board of Supervisors has adopted Findings Regarding Significant Effects for the Proposed Project, which identify that certain significant effects of implementing the Project are unavoidable even after incorporation of any feasible mitigation measures. The Board of Supervisors finds that the above-remaining unavoidable significant effects are acceptable due to each of the specific economic, legal, social, technological, or other Overriding Benefits that will result from approval and implementation of the Project, as listed below. All of these benefits are based on the facts set forth in the CEQA Findings Regarding Significant Effects, the Final EIR, and the record of the proceedings for the Proposed Project. Each of these benefits is a separate and independent basis that justifies approval of the Project, so that if a court were to set aside the determination that any particular benefit will occur and justifies Project approval, the Board of Supervisors finds that it would stand by its determination that the remaining benefit(s) are sufficient to warrant Project approval.

Overriding Benefits

The Board of Supervisors finds that the Proposed Project would have the following substantial Overriding Benefits:

1. The Project will preserve a large portion of the Ramona Grasslands within dedicated open space by the consolidation of development. Specifically, the Project will preserve 551.5 to 576.2 acres of land within open space, which will be contiguous with the preserved Ramona

Grasslands. The Ramona Grasslands preserve features habitat that has all but disappeared in the County and is acknowledged as constituting an exceptional part of the natural heritage of San Diego, as well as containing associated sensitive species. The preserve is a partnership of the County, The Nature Conservancy, and the Wildlife Research Institute, and is funded by a State Water Resources Control Board Proposition 13 grant. The additional preserved land set aside by the Proposed Project will enlarge the area available for use by the sensitive species and enhance the health of the preserve through providing additional preserved open space, buffering the preserve from abutting developed uses. This constitutes biological and scientific benefits of regional and state-wide significance. On a more local level, preservation of this large block of open space contributes to the character of the Ramona community as a whole.

2. The Project will place in dedicated open space all on-site southern coast live oak riparian forest, southern riparian scrub, and disturbed wetland. These biological habitats are not impacted by the Proposed Project. The open space will contain the totality of these on-site habitats, as well as rock outcrops and steep slopes. Retention of these areas in open space will provide biological benefit to species that use these habitats, as well as community/regional character and visual benefits related to retention of steep slopes and outcrops.
3. The Project will place a large amount of biological habitat into open space as required mitigation. Exceeding this required dedication, over 193 acres of sensitive habitat will be put into permanent open space. This includes 9.8 acres of dense Engelmann oak woodland, 17.08 acres of open Engelmann oak woodland, 111.0 acres of Diegan coastal sage scrub, 48.81 acres of southern mixed chaparral and 6.81 acres of chamise chaparral. This large-block contribution to regional open space will support to regional preserve planning as well as provide scientific and biological benefits on a regional level.
4. The Project will preserve habitat utilized by sensitive animal species, including coastal California gnatcatcher (*Polioptila californica californica*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), California thrasher (*Toxostoma redivivum*), loggerhead shrike (*Lanius ludovicianus*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), two-striped garter snake (*Thamnophis hammondi*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and San Diego desert woodrat (*Neotoma lepida* ssp. *intermedia*). This will support survival of these species at sustainable levels. This provides regional (and greater) biological and scientific benefits, as well as recreational benefits to the community of bird watchers.
5. The Project will improve off-site roadways, including segments of Ash Street, Montecito Way and Montecito Road. Improvements will include widening of pavement and right-of-way, as well as inclusion of bike lanes and multi-purpose trails along the roadways. These improvements will provide circulation and safety benefits to all users of these facilities. While these benefits would be expected to accrue most directly to residents of properties

abutting these streets, they will also benefit future residents of Montecito Ranch, as well as the larger Ramona community.

6. The Project will improve the intersections of Ash Street/Pine Street (SR 78), Main Street (SR 67)/Pine Street, Montecito Road/Montecito Way (SA 330), Main Street/Montecito Road, SR 67/Highland Valley Road/Dye Road, and SR 67/Archie Moore Road. Improvements will include widening, restriping and/or signalization. These improvements will provide circulation and safety benefits to all users of these facilities, minimizing wait times at the intersection and increasing certainty for the driver regarding cross traffic in crossing the intersection. As primary community roadways, these improvements will primarily benefit all users of the community transportation system, including the Ramona community as a whole as well as through traffic from other parts of the County. The Project will construct Montecito Ranch Road to create a “loop road” system from SR 78 to SR 67 via Ash Street, Montecito Ranch Road, and Montecito Road, which will improve regional traffic congestion. This circulation improvement will benefit the Project as well as other existing and future development within the surrounding community.
7. The Project will preserve and renovate the on-site historic (125-year old) Montecito Ranch House within a dedicated 11.9-acre historic park site. Preservation of this historic structure will provide educational benefits relevant to the San Diego region.
8. The Project will dedicate the historic Montecito Ranch House to the County or cooperating group for use as an interpretive center, community center, or museum. This is a social benefit that will serve both residents of Montecito Ranch as well as the larger Ramona community.
9. The Project will fully develop and dedicate an 8.3-acre local park that will provide social and recreational benefits to the future residents of Montecito Ranch, as well as other residents of the Ramona community. The local park will be developed with play fields, a tot lot, picnic areas and restrooms.
10. The Project will fully develop an equestrian staging area, which also would act as an overflow parking area for the parks site. The equestrian facilities to be provided at the staging area will include several 15-foot by 15-foot horse pens, an 80-foot diameter round pen, an animal wash down area, hitching posts, a 100-foot by 150-foot arena with bleacher seating, a picnic area, and parking (including horse trailer parking). This area will connect to the regional trail system. The availability of the staging area to trail users from outside the Proposed Project would provide social and recreational benefits to the larger Ramona community.
11. The Project will include a 6.8-mile multi-purpose trail system within the Project site, designed to accommodate outdoor activities such as hiking, horseback riding and bicycling. The proposed trail system includes multi-purpose community trails within proposed open space connecting to existing trails off site to the north, south, east and west, as well as a community pathway along proposed Montecito Ranch Road and the segment of Montecito Way within the Project site. Community feeder trails also will occur throughout the

proposed on-site residential development. The connections to off-site trails/pathways, as well as development of additional trails within the Project, will provide social and recreational benefits to residents of Montecito Ranch as well as the larger Ramona community.

12. The Project will place 13 significant cultural sites in dedicated open space and implement a Resource Protection Plan to deter vandalism (both intentional and accidental) and collection of cultural resources. These sites are considered significant as they contain data to address important research questions related to regional prehistory and/or history. Preservation will result in retention of scientific data that might otherwise be lost, providing an educational resource for the future that extends far beyond the immediate Project. In addition, preservation of these resources provides cultural benefits to the San Pasqual Band of Mission Indians (among others).
13. The Project will generate new construction employment opportunities over the anticipated three-to-five year buildout. This will provide an economic benefit to the community, and potentially the region as a whole.

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DECISION AND EXPLANATION REGARDING RECIRCULATION OF
DRAFT ENVIRONMENTAL IMPACT REPORT

MONTECITO RANCH PROJECT

SP01-001; VTM 5250RPL⁶; P04-045; P09-023; GPA 04-013; R04-022; STP 08-019;
ER 09-013; Log No. 01-09-013
SCH No. 2002021132

August 4, 2010

BACKGROUND: A Draft Environmental Impact Report (EIR) for the Montecito Ranch Project (hereinafter referred to as "Proposed Project" or "Project") was circulated for public review. Several federal, state and local agencies, private organizations, and individuals submitted comment letters on the Draft EIR. A total of 35 comment letters and 2 petitions were received by the County of San Diego (County), including 10 letters expressing support for the Project. The County prepared responses to all comments received during the public review period, which are included in the Final EIR. After public review, the Draft EIR was changed or modified in several places; either in response to public comments received, or the Project Applicant's or the County's desire to clarify a matter, or due to Project modifications. Pursuant to State California Environmental Quality Act (CEQA) Guidelines Section 15088.5(a), the County is required to recirculate the Draft EIR if significant new information is added after public review of the Draft EIR, but before certification. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the Project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the Project's proponents have declined to implement.

DECISION: The Board of Supervisors has reviewed the changes made to the Draft EIR following public review, and determines that no "significant new information" has been added and therefore, recirculation of the Draft EIR is not required. The following provides an explanation of the modifications made to the Draft EIR.

Project Description/Design Changes

1. Deletion of the Future School Site

Throughout Final EIR. The Draft EIR indicated that a 10.6-acre future school site would be located off of future Montecito Ranch Road in the vicinity of the proposed parks and wastewater reclamation facility (WRF). Additional coordination with the Ramona Unified School District (RUSD), however, indicates that the RUSD no longer considers the site a viable location for a future school. As a result, this use has been eliminated from the Final EIR. Any graphic or text references to the future school site in the Final EIR should be ignored by the reader. Upon Project approval, the future school site would be incorporated into open space set aside as part of the Project. Placement of this previously impacted area into open space would not result in any changes to the significance of impacts assessed to the Proposed Project.

2. Adjustments to the Fuel Modification Zone

Throughout Final EIR. The Fire Protection Plan for the Project (RC Biological Consulting, Inc. 2009; Appendix P) has been revised since public circulation based on requests from the Ramona Fire District (RFD). The Fire Protection Plan now incorporates a larger fuel modification zone along the northeastern portion of the Proposed Project development area, allowing for a 100- to 150-foot setback, instead of the 100-foot setback previously proposed. The modified impact footprint is reflected in the Final EIR on revised Figures 1-6 through 1-9 and on Page 1-11. In addition, this modification has led to the revision of all impacts acreages, as well as proposed open space acreages, throughout the Final EIR. The revisions to vegetation community impacts associated with the revised fuel modification zone are minimal (resulting in fewer impacts overall) and do not result in any changes to the significance of impacts assessed to the Proposed Project. Fewer impacts would occur because the footprint of the proposed residential area was “pulled in” in some locations; and although the fuel modification zone increased, the increase was made inside the proposed footprint.

3. Additional Upgrade to Potable Water Facilities

Throughout Final EIR. An additional upgrade to a potable water pipeline would occur within Alice and Olive Streets for a total length of approximately 5,000 feet of piping. The existing 14-inch facility within these streets would be replaced with a 24-inch main connecting to the existing 24-inch West End Transmission System at the intersection of Montecito Road and Alice Street on the south end of the pipeline in order to compensate for the additional flow demand resulting from the Proposed Project. The water line would be placed within existing roadway, and no disturbance would occur beyond the existing roadbeds with regard to placement of the pipeline. Upgrades would include pump installation at the existing Olive Street Pump Station (the northern terminus of the upgrade) to pump directly to the downtown service zone via the West End Transmission System. This additional upgrade has been analyzed as appropriate throughout the Final EIR, and would not result in any changes to the significance of impacts assessed to the Proposed Project.

4. Modification to Project Trails

In order to respond to wildlife agency concerns regarding Project trails through open space, a total of 0.97 linear mile of trail has been deleted from the Proposed Project, with 6.83 miles of trail and pathway retained. Figures 1-38, Proposed Ramona Community Trails and Pathways Network, as well as other EIR figures with underlying trail information, of the Final EIR have been revised to depict the final trail system, and text has been revised to show the corrected miles of trail throughout the Final EIR. Trails opening into or abutting protected open space associated with the Ramona Grasslands on the southwest corner of the project and off-site private property to the west have been deleted. On the east side of the project, a trail curving into Diegan coastal sage scrub on site west of Summer Glen Road, and paralleling Summer Glen Road to the property edge, has been deleted. Project trails would still tie into community trails and pathways shown on the Ramona Community Trails and Pathways Network. The deletion of the 0.97 mile of trail also would reduce impacts to Diegan coastal sage scrub.

5. Deletion of Draft EIR Proposed Water Tank Location

The Draft EIR noted that a potable water tank would be located on the neighboring property to the west. Any graphic, tabular or text references to water tank being located to the west of the Proposed Project, or to effects associated off-site water tank in the Final EIR should be ignored by the reader. Upon Project approval, and in lieu of that water tank, either a booster station will be constructed in accordance with the Closed Water System Alternative (addressed in Section 5.6 of the Final EIR), or

a water tank would be constructed on the Ramona Municipal Water District's John C. Bargar Water Tank Site, located on/east of Black Canyon Place. The removal of this off-site tank eliminates a land use inconsistency as well as biological and visual impacts related to the on- and off-site grading into Diegan coastal sage scrub and off-site steep slope. Placement of a new tank onto the Bargar site, a previously impacted and fully graded area, would not result in changes to the significance of impacts assessed to the Proposed Project. Similarly, all Project-associated water pipelines would be located within existing roadways, and temporary construction activities associated with placement of new or upgraded waterlines into disturbed and/or developed areas would not result in any changes to the significance of impacts assessed to the Proposed Project.

6. Other Minor Project Description/Design Changes and Clarifications

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

- Throughout Final EIR. The term "reclaimed water" has been changed to "effluent." The term "effluent" refers to the reclaimed/treated water produced by a WRF. In this case, effluent from the WRF would undergo a tertiary treatment process and meet Title 22, Division 4 of the California Administrative Code for unrestricted irrigation reuse. This is merely a clarification within the text.
- Throughout Final EIR. The term "roadway design exceptions" has been corrected to "requests for modifications to road standards."
- Throughout Final EIR. It was clarified that "minimum 0.5-acre residential lot(s)" were in actuality "minimum approximately 0.5-acre (20,000 square foot) residential lot(s)."
- Throughout Final EIR. Information regarding the Davis Specific Planning Area (SPA) was changed to state, "The Davis SPA was acquired by the County in 2008 with Endangered Species Act Section 6 funding." The Davis SPA is no longer owned by The Nature Conservancy.
- Page 1-1. The statement, "A separate Major Use Permit would be required for the WRF and will be processed prior to certification of the Final EIR if Option 2 is selected during Planning Commission consideration of the Project and prior to approval of the plan by the Board of Supervisors," was changed to, "A separate Major Use Permit has been prepared for the WRF (P09-023)."
- Page 1-4. The realignment of SA 330 between Montecito Road and State Route (SR) 67 was eliminated from the proposed General Plan Amendment.
- Page 1-5. The classification of proposed Montecito Ranch Road was changed from "special classification" to "modified rural light collector" for clarification.
- Page 1-5. "Landscape Maintenance District (LMD)" has been corrected to "Lighting and Maintenance District (L&MD)."

- Page 1-10. The phrase “if not completed by another entity” was removed from the following sentence: “Thus, the Project would improve the segment of Pine Street between B Street and Main Street to a pavement width of 40 feet within a 60-foot-wide right-of-way if not completed by another entity.” This is due to the fact that this improvement would be made by the Project Applicant.
- Page 1-11. The text was revised to state that the intersection of Pine Street/Olive Street has been signalized by Caltrans and that the Project Applicant would evaluate and potentially upgrade the existing intersection and signal.
- Page 1-11. Acceptance dates of the Fire Protection Plan were added.
- Page 1-12. The required width of fuel modification zones along either side of roadways was changed from 10 to 30 feet to be consistent with Section 603 of the Ramona Municipal Water District (RMWD) Code.
- Page 1-13. A reference to the Historical Resource Review, Impact Assessment, and Preservation Plan for the Montecito Ranch House Complex (CA-SDI-12,476/H) in EIR Appendix G was provided. It was also stated that this document “would require approval by the County prior to building permits for the renovation being obtained.”
- Page 1-13. The Open Space Easements and Trails discussion was altered to clarify that “a Landscape Maintenance District (LMD) would be formed to pay for the management and maintenance of the on-site open space,” and to provide a brief discussion of it.
- Page 1-14. The realignment of the SA 330 trail between Montecito Road and SR 67 was eliminated from the amendment to the Ramona Community Trails and Pathways Plan within the San Diego County Community Trails Master Plan (CTMP) due to the deletion of proposed SA 330 realignment south of Montecito Road.
- Page 1-16. The phrase “if capacity becomes available” has been deleted from the sentence which begins, “The wastewater from the Proposed Project ...”. Also, the Final EIR acknowledges that “expansion of the Santa Maria [wastewater treatment plant (WTP)] is analyzed under a separate CEQA document prepared by RMWD,” and not a part of this EIR. The footnote has been amended to note that the EIR was certified by the RMWD Board on May 25, 2010.
- Page 1-18. A clarification was made that the emergency generators for the proposed WRF and pump stations would require permits from the Air Quality Management Board, as part of Project design.
- Page 1-19. The following clarifying statement was added: “A County Maintenance District would be formed and would pay for the maintenance of [the] storm drain facilities.”
- Page 1-21. In the Development Phasing Strategy for Traffic Improvements matrix, improvements to the intersections of SR 67/Highland Valley Road/Dye Road and Pine Street/Main Street were moved from Phase 2 to Phase 1.
- Page 1-21. The fact that “no import or export of external fill would be required for the Project overall” was specifically called out.

- Page 1-21. The statement, “it is more likely that a maximum of 100 workers would be present on site,” was eliminated.
- Page 1-22. The following text was eliminated from the Final EIR: “The Project is unable to carry the entire economic burden for public facilities that would be provided by the Project and also would benefit others. Shared implementation responsibility (e.g., the historic park and charter high school site) and reimbursement through the County’s Transportation Impact Fee (TIF) program are anticipated. Cost sharing for the construction of public facilities that benefit the Project and others is subject to negotiation as part of the on-going project review and approval process.”
- Page 1-24. The sentence, “These impacts have been addressed and mitigated through the Natural Community Conservation Planning (NCCP) process, working with County and resource agency staff,” was altered to state, “These impacts have been addressed and mitigated through a County code enforcement action and a subsequent settlement agreement between the Project Applicant and the County.”
- Page 1-25. The following were eliminated from the Matrix of Project Approvals and Permits: Street Vacations, Execution of Irrevocable Offer to Dedicate right-of-way, Long-term Maintenance Agreement for Parks, and Signal Warrants for SR 67/Archie Moore and SR 78/Ash Street.
- Page 1-26. Within the Matrix of Project Approvals and Permits, Airport Land Use Compatibility Plan Consistency Determination was added as a discretionary approval. In addition, the approving agency of this approval, as well as Notice of Proposed Construction or Alteration – Off-airport Approval, was changed from Federal Aviation Administration to San Diego County Regional Airport Authority.
- Page 1-26. In Section 1.3.2, List of Related Environmental Review and Consultation Requirements, it was clarified that the Project Applicant had consulted with the County Department of Public Works, adjacent property owners, California Department of Transportation (Caltrans) and County Department of Parks and Recreation.
- Page 1-28. It was clarified in the Final EIR that, “The previously disked areas on site currently support non-native grassland.”
- Page 1-29. The Comprehensive Land Use Plan for Ramona Airport was replaced with the updated Ramona Airport Land Use Compatibility Plan.
- Page 1-30. An example was given as to why changing road classifications is appropriate based on the most current land use and traffic projections for the area.
- Page 1-31. A clarification was made that, “If the cost of improvements does not equal the fair share assessment, that portion of the fair share assessment exceeding the amount spent on Applicant-provided improvements will be contributed per the ordinance.”
- Page 1-31. Approval of a rezone was added to the last paragraph of Subchapter 1.5, Inconsistency With Applicable Regional and General Plan.

- Pages 1-31 through 1-33. Subchapter 1.6, List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area, was modified to state the appropriate cumulative study area for different environmental issues.
- Page 1-34. The following sentence has been deleted: “In spite of a slowing housing market, the demand for housing in Ramona has remained strong, with an estimated 2006 vacancy rate of only 2.6 percent (down from 3.5 percent in 2000; San Diego Association of Governments [SANDAG] 2006).”
- Page 1-37. Subchapter 1.8, Significant Irreversible Environmental Changes Resultant from Project Implementation, has been added to the Final EIR.
- Page 1-41 (Table 1-4, Summary of Proposed Intersection Improvements). The phrase, “Installation of a signal (if not already completed by another entity),” was removed from Pine Street/Olive Street and replaced with, “Evaluation and potential upgrade of existing signal,” as installation of a signal has already occurred. In addition, the table was revised to state that right-of-way acquisition would be required at Montecito Road/Montecito Way and Highland Valley Road/Dye Road/SR 67.
- Page 1-46 (Table 1-7, Additional Environmental Design Considerations) and M-19. Two design considerations were added under Air Quality – Operation: (1) Obtain permits from the Air Quality Management Board with regard to the emergency generators for the WRF and pump stations, and (2) provide natural gas fireplaces within proposed residences.
- Page 1-47 (Table 1-7, Additional Environmental Design Considerations) and M-20. The first bullet under Noise – Operation was deleted because it is actually a mitigation measure cited on Page 3.3-15 of the Final EIR, not an environmental design consideration.
- Page 1-58 (Table 1-7, Additional Environmental Design Considerations) and M-31. The first bullet under Public Services – Construction and Operation was modified to state, “Expanded police protection services would be funded from contributions made by the Project Applicant to the Sheriff’s Department, consistent with the Public Facility Element to fund police protection staff and services.” In addition, another environmental design consideration was added, which states, “The Project Applicant would pay the County’s Fire Mitigation Fee, based on the type and square footage of proposed structures, during the building permit phase of the Project.”
- Pages 1-73 through 1-85 (Table 1-10, Summary of Environmental Impacts of Related Projects). The Average Daily Traffic (ADT) column was eliminated from this table. Where traffic comprised an environmental issue, it was otherwise identified and this column did not provide necessary information.

Environmental Analysis Changes

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

1. Modifications to Chapter 2.0, Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented

The following discussion includes changes in the Final EIR to Subchapters 2.1, Transportation/Circulation, and 2.2, Air Quality.

a. *Subchapter 2.1, Transportation/Circulation*

- Page 2.1-2. The phrase “if the additional traffic would cause a noticeable or unacceptable increase in congestion or decrease in level of comfort for motorists” was eliminated from the following sentence: “An increase in volume-to-capacity ratio (V/C) of greater than two percent at LOS E or F may be determined a significant traffic impact if the additional traffic would cause a noticeable or unacceptable increase in congestion or decrease in level of comfort for motorists.” In addition the sentence now references County of San Diego Guidelines for Determining Significance – Transportation/Traffic, December 5, 2007.
- Page 2.1-2. The determination of existing and future capacity levels was clarified.
- Page 2.1-6. Clarification was added as to why SANDAG trip generation rates were used.
- Page 2.1-7. Clarification was added with regard to less than significant impacts to analyzed street segments exceeding their design capacities.
- Pages 2.1-8 through 2.1-10 and 2.1-16 through 2.1-18. Text within original Section 2.1.5, Effects Found Not to be Significant (Roadway Design Hazards and Pedestrian/Equestrian/Bicyclist Safety), was relocated to Section 2.1.3, Analysis of Project Effect and Determination as to Significance.
- Page 2.1-14. Language was added explaining how Public Facilities Element Transportation Policy 1.1 of the County General Plan states that peak hour roadway segment analysis provides a more realistic assessment of how a roadway actually would operate. In addition, the following sentence was added: “Peak hour analysis provides a snap shot analysis of the busiest hour and provides the most detail.”
- Page 2.1-14. The following sentence was added to provide clarity: “The segments are already over capacity or would not exceed capacity with the addition of Project-generated traffic (refer to Table 2.1-7).”
- Pages 2.1-14 and 2.1-15. Under both Year 2030 Without Project Intersection Level of Service and Year 2030 Plus Project Intersection Level of Service Before Project Mitigation (Significance Guideline Nos. 4 through 10), Year 2010 was changed to Year 2030.
- Page 2.1-14. The following sentence was deleted under Year 2030 Without Project Intersection Level of Service: “Under this scenario, the TIA assumes the construction of the proposed Montecito Way extension, regardless of whether the Proposed Project is built.”
- Pages 2.1-18 and 2.1-19. Analysis of Effects Associated With SA 330 Extension was deleted.

- Pages 2.1-19 and M-1. Text was added to clarify that construction of Montecito Ranch Road would be part of Project design.
- Pages 2.1-19 and 2.1-20. An explanation of the County's Transportation Impact Fee (TIF) program was added.
- Pages 2.1-20, S-12, M-1 and M-2. Timing on mitigation for significant impacts to the intersections of Pine Street/Main Street (Project-related direct and cumulative) and SR 67/Highland Valley Road/Dye Road (Project-related direct) was changed from "prior to the occupancy of the 281st house on site" to "prior to issuance of an occupancy permit on site."
- Pages 2.1-20, S-12 and M-2. The wording on mitigation for significant Project-related direct and cumulative impacts to the intersection of Main Street/Montecito Road was changed from "prior to issuance of the first occupancy permit on site" to "prior to issuance of an occupancy permit on site."
- Pages 2.1-21, S-13 and M-2. The wording on mitigation for significant Project-related direct and cumulative impacts to the intersection of Pine Street/Olive Street was changed from, "The Project Applicant shall make a fair share contribution to the County to be allocated toward the installation of a traffic signal at the intersection of Pine Street/Olive Street prior to issuance of the first occupancy permit on site and to the satisfaction of the Director of DPW. If the traffic signal is not installed by another entity prior to issuance of the first occupancy permit, the Project Applicant shall install a traffic signal," to, "The Project Applicant shall evaluate and potentially upgrade the existing signal at the intersection of Pine Street/Olive Street prior to issuance of an occupancy permit on site and to the satisfaction of the Director of DPW," because signalization at this intersection has occurred since public review.
- Pages 2.1-21, 2.1-22, S-13, S-14 and M-3. The wording on mitigation for significant impacts to the intersections of SR 67/Archie Moore Road (Project-related direct and cumulative) and SR 67/Highland Valley Road/Dye Road (cumulative) was changed from "prior to the occupancy of the 281st house on site" to "prior to issuance of a permit for occupancy of homes 281 through 417."
- Pages 2.1-21, S-14 and M-3. The following mitigation measure was added to mitigate Project-related cumulative impacts to both Pine Street/10th Street from Haverford Road to H Street and Main Street (SR 67) from 7th Street to Poway Road: "The Project Applicant shall make a contribution via payment into the TIF program prior to issuance of an occupancy permit on site."
- Pages 2.1-22, S-14 and M-3. Mitigation for Project-related cumulative impacts to the intersections of SR 78/Magnolia Avenue and Main Street/14th Street was changed to eliminate reference to "fair-share contribution via payment toward another project according to Board Policy J-25." The mitigation states in the Final EIR that, "The Project Applicant shall make a contribution into the TIF program prior to issuance of a permit for occupancy of homes 281 through 417."
- Pages 2.1-22 and 2.1-23. Additional text was added to the last paragraph under Section 2.1.5, Mitigation Measures Proposed to Minimize the Significant Effect, providing justification as to why significant direct impacts to roadway segments are significant and mitigation is infeasible.

- Pages 2.1-24 and 2.1-25. The conclusion was revised to reflect the above changes made in Subchapter 2.1.
- Pages 2.1-34 and 2.1-35 (Table 2.1-9, Traffic Mitigation and Project Design). This table was revised to reflect the above changes made in Subchapter 2.1, as well as correction of a reference to “Main Street” to “Montecito Road” under the discussion of Montecito Way.

b. *Subchapter 2.2, Air Quality*

- Pages 2.2-3 through 2.2-7. Heading levels under Climate Change in Section 2.2.1, Discussion of Existing Conditions Relating to Air Quality, were deleted to improve text flow and minimize confusion.
- Page 2.2-3. The following sentence was deleted: “The current U.S. President, George W. Bush, has indicated that he does not intend to submit the treaty for ratification.”
- Page 2.2-4. A sentence regarding greenhouse gas (GHG) reductions was revised to provide clarity.
- Page 2.2-6. The General Approach section was deleted because it (1) consisted of philosophical questions not directly required for the analysis and (2) contained duplicative language.
- Pages 2.2-9 and 2.2-10. The Guideline Sources/Methodology section was updated with the latest (as of mid-September 2009) information regarding global climate change.
- Page 2.2-16. A reference to Table 2.1-4 for Proposed Project trip-generation rates was added.
- Page 2.2-19. A statement has been added that, “No odors would be associated with the effluent [produced by the proposed WRF].”
- Pages 2.1-19 and 2.2-20. The maximum number of horses permitted within a residential lot would be two, as described in Chapter 1.0. The maximum number of horses was changed from four to two on this page. Additional clarification also was provided as to why odors from horse facilities on residential lots would be less than significant.
- Pages 2.2-20 and 2.2-26 through 2.2-28. Text within original Section 2.2.5, Effects Found Not to be Significant (Conformance with RAQS and SIP, Short-term Construction Emissions, Long-term Operation CO Hot Spots, Generation of Diesel Emissions and Toxic Air Contaminants, Generation of Odors, and Global Climate Change), specifically Diesel Odors and Off-site Odors, was relocated to Section 2.1.3, Analysis of Project Effect and Determination as to Significance. The rest of Section 2.2.5 was deleted, as it was repetitive.
- Page 2.2-23. Text was relocated from under Carbon Capture to Anticipated Emissions Reductions with Project Design Features.
- Page 2.2-24. References to Sections 4.1.4, Hazards and Hazardous Materials, and 4.1.5, Utilities/Service Systems, were added.

- Page 2.2-24. Analysis of Effects Associated With SA 330 Extension was deleted.
- Page 2.2-24. The phrase, “and the project’s contribution accounts for an insignificant proportion of the cumulative total emissions,” was deleted from the last sentence of the first paragraph under Section 2.2.4, Cumulative Impact Analysis.
- Page 2.2-44 (Table 2.2-17, Proposed Project Design Features to Reduce GHG Emissions). The following sentence was added to Afforestation/Reforestation: “Approximately 550 to 575 acres (depending on which Wastewater Management Option is implemented) would be placed in biological open space, which would help balance carbon storage with any loss associated with future landscaping and/or residences.” In addition, the following sentence was added to Hydrofluorocarbon Reduction: “The GHG emissions reductions associated with ongoing energy efficient appliance standards are expected to be approximately 7 million metric tons CO₂e by 2020.”
- Page 2.2-45 (Table 2.2-18, GHG Emissions Under Operational Control of Project Applicant). The following note was added to this table: “Wastewater Management Option 2 would require use of effluent generated by the proposed WRF. If Option 1 is selected, RMWD also would require use of reclaimed water.”

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

The following discussion includes changes in the Final EIR to Subchapters 3.1, Land Use and Planning; 3.2, Biological Resources; 3.3, Noise; 3.4, Cultural Resources; and 3.5, Aesthetics.

a. *Subchapter 3.1, Land Use and Planning*

- Pages 3.1-2, 3.1-8, 3.1-21, 3.1-22 and 3.1-59 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The reference to the Comprehensive Land Use Plan for Ramona Airport was replaced with a reference to the updated Ramona Airport Land Use Compatibility Plan.
- Page 3.1-10. A reference to Table 3.1-2 was added.
- Page 3.1-13. The discussion of water sufficiency to support irrigated cultivation on site was modified to state that there would be an insufficient on-site supply. In addition, the following text was added: “Well water contains minerals that can affect crop yield. Purchase of potable water for farming on site would make such activities infeasible due to costs of water. Dependence upon rain water might support some dry-farming activities, but would not support any activities requiring irrigation.”
- Page 3.1-15. The realignment of SA 330 between Montecito Road and SR 67 was eliminated from the proposed General Plan Amendment.
- Page 3.1-16. The following sentence was added under County of San Diego Board of Supervisors Policy I-78: “The findings include (1) the Project is located within the Urban Limit Line or within one mile of the Urban Limit Line or (2) annexation and hookup to a traditional sewer system shall be prohibited until the Urban Limit Line is extended.” In addition, a reference to Table 3.1-2 was added.

- Page 3.1-19. Additional justification as to why the Project would avoid potentially significant land use impacts associated with RPO conformance, specifically to wetland buffers, was added.
- Page 3.1-20. The realignment of the SA 330 trail between Montecito Road and SR 67 was eliminated from the amendment to the Ramona Community Trails and Pathways Plan within the CTMP due to the deletion of proposed SA 330 realignment south of Montecito Road.
- Pages 3.1-21 and 3.1-142 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The discussion of the North County Multiple Species Conservation Program (MSCP) Subarea Plan was updated to reflect that a preliminary draft of the North County MSCP Subarea Plan was released for public review on February 19, 2009. If the Proposed Project is approved after the adoption of the North County MSCP Subarea Plan, the Project would be required to make findings of conformance to the Subarea Plan. Such information was added to the text.
- Pages 3.1-21 and 3.1-22. The following text was added, “On December 16, 2008, the San Diego County Regional Airport Authority determined that the Project was conditionally consistent with area airports. The letter specifically addressed the compatible nature of proposed uses, structure heights, and Community Noise Equivalent Level (CNEL) contours. The letter also indicated that the WRF storage ponds may pose bird strike hazards to planes. As such, if Option 2 is selected by the County for implementation, the San Diego County Airport Land Use Commission must review the WRF under a separate consistency determination at the time of WRF development.” None of these conditions would result in a new significant impact.
- Page 3.1-27. The discussion of potentially significant noise impacts to building interiors was deleted from under Ash Street Community Character, as County guidelines relevant to interior noise apply only to new structures. In addition, the conclusion that impacts could be adverse was deleted; impacts would remain less than significant.
- Page 3.1-28. The word “interior” was removed from the following sentence: “Because of the significant impact to interior noise levels of two homes along Montecito Way, the Project would significantly affect the existing community character of Montecito Way, pursuant to Significance Guideline No. 2.”
- Page 3.1-29. A discussion of the effect of traffic and associated noise increases on the community character of Montecito Road was added; impacts would be less than significant.
- Page 3.1-30. Analysis of Effects Associated With SA 330 Extension was deleted.
- Pages 3.1-32. Text within original Section 3.1.5, Effects Found Not to be Significant (Plan Conformance with the County Subdivision Ordinance, RPO, County Light Pollution Code, Congestion Management Program, Natural Community Conservation Planning Program, Land Use Compatibility, and Community Character), was deleted, as it was repetitive.

- Pages 3.1-32, 3.1-33, S-16, S-17, M-5 and M-6. Mitigation for Significant Impact Nos. 3.1.3d (significant land use plan impacts) and 3.1.3f (significant community character impacts) were separated.
- Pages 3.1-32, S-16 and M-5. The word “interior” was removed from the following sentence in Mitigation for Significant Impact Nos. 3.1.3d: “This measure includes construction of noise walls or rubberized asphalt in front of the two houses that would be significantly affected by interior noise levels.”
- Page 3.1-33. The word “scrubs” was corrected to “shrubs” in Mitigation for Significant Impact No. 3.1.3e.
- Page 3.1-34. The conclusion was revised to reflect the above changes made in Subchapter 3.1.
- Pages 3.1-36 (Table 3.1-1, Land Use Conditions/Policies Guiding Project Development) and 3.1-59 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). Industrial Condition 28 under the Montecito Ranch Specific Planning Area Section of the Ramona Community Plan was changed to state “Airport Authority” instead of “SANDAG.”
- Page 3.1-39 (Table 3.1-1, Land Use Conditions/Policies Guiding Project Development). The last sentence in Residential Policy 5 under the Ramona Community Plan Land Use Element was deleted because it is not a part of the policy.
- Page 3.1-69 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The word “generally” was deleted from the following sentence under the Proposed Project Compliance column for Public Facilities Condition 48 of the Montecito Ranch Specific Planning Area Section of the Ramona Community Plan: “The Montecito Ranch GPA Report includes a financing plan generally outlining the improvements necessary to implement the Project.”
- Page 3.1-78 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was added to Residential Policy 3 in the Land Use Element of the Ramona Community Plan: “In addition, residential lots on the Project site would be large enough to accommodate garden areas for fruits and vegetables.”
- Page 3.1-86 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The realignment of SA 330 between Montecito Road and SR 67 was eliminated from the proposed General Plan Amendment.
- Page 3.1-90 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). References to the sparse lithic scatter identified within or near the location of the proposed off-site water storage tank pad was assessed for significance under CEQA and RPO have been deleted as the off-site tank has been deleted from the Proposed Project.
- Page 3.1-102 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was relocated within the compliance discussion of Environmental Goal 3.2 of the Regional Land Use Element of the San Diego County General Plan: “The generation and use of reclaimed water on site also would improve the energy efficiency of the Project.”

- Page 3.1-105 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was added to provide more clarity to the compliance discussion under Housing and Social Goal 6.1 of the Regional Land Use Element of the San Diego County General Plan: “Guest houses also would be permitted, which could provide an affordable housing option for certain population segments, such as the elderly.”
- Page 3.1-128 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The Proposed Project compliance discussion was modified to state, “A contribution would be made by the Project Applicant to the Sheriff’s Department, consistent with the Public Facilities Element, to fund expanded police protection staff and services resulting from the Proposed Project as well as from other cumulative developments in the Ramona area that contribute to the increased demands on police protection services,” under Law Enforcement Objective 1 and Policy 3.2 of the Public Facility Element of the San Diego County General Plan.
- Page 3.1-129 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was added to provide more clarity to the compliance discussion under Libraries Objective 2 and Policy 2.2 of the Public Facility Element of the San Diego County General Plan: “The policy is developed to implement an overall objective of equitable funding. The policy is advisory in that it requires the County to seek regulatory cooperation, but does not require the County to obtain such cooperation.”
- Page 3.1-130 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The phrase “in accordance with either Government Code Section 53080 or Section 65970 prior to the issuance of building permits” was added to the end of the following sentence under the compliance discussion within Schools Objective 1 and Policies 1.2 and 3.1 of the Public Facility Element of the San Diego County General Plan: “The Project Applicant would pay development impact fees to the school district.”
- Page 3.1-131 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The compliance discussion for Fire Protection and Emergency Services Policies 1.2 and 2.1 of the Public Facility Element of the San Diego County General Plan was updated as follows: “An acceptable response time (five minutes) is anticipated from Station No. 80 to the proposed residences, and CDF/RFD Station No. 80 is equipped to serve the Proposed Project residences and charter high school site (2006 Project Facility Availability Form). The Project Applicant would pay the County’s Fire Mitigation Fee during the building permit phase of the Project. This fee is based on the type and square footage of proposed structures. On a quarterly basis, collected fees are sent to the RMWD Fire Division and can be used to upgrade facilities.”
- Page 3.1-133 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The phrase “are expected” was replaced with “would be required” in the compliance discussion for Implementation Measure 2.1.1(d) of the Public Facility Element of the San Diego County General Plan.
- Page 3.1-134 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The compliance discussion for Implementation Measure 2.1.1(g) of the Public Facility Element of the San Diego County General Plan was updated to include the phrase, “as defined in the Master Reclamation Plan,” after the phrase, “the WRF would serve the entire sewer drainage basin.”

- Page 3.1-136 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was added to the end of the Project compliance discussion under Water Provision Systems Policies 1.2 and 1.3 of the Public Facility Element of the San Diego County General Plan: “A commitment letter from RMWD would be required prior to construction.”
- Pages 3.1-136 and 3.1-137 (Table 3.1-2, Land Use Conditions/Policies Consistency Evaluation). The following sentence was added to the beginning of Courts and Jails Policy 1.1 and Health Policy 4.1 of the Public Facility Element of the San Diego County General Plan: “The policy is developed to implement an overall objective of equitable funding. The policy is advisory in that it requires the County to seek regulatory cooperation, but does not require the County to obtain such cooperation.”

b. *Subchapter 3.2, Biological Resources*

- Page 3.2-1. The dates of when surveys and habitat assessments were performed were added.
- Page 3.2-12. The following sentences were added under Multiple Species Conservation Program: “A preliminary draft of the North County MSCP Subarea Plan was released for public review on February 19, 2009. The Project site is within the planning area of the proposed North County Segment of the MSCP.”
- Page 3.2-19. A reference to Section 3.1, Land Use and Planning, was added under Direct Impacts to On-site Jurisdictional Areas.
- Page 3.2-20. Under Direct Impacts to On-site Sensitive Animal Species, the phrase “a conservative assessment of potential impact is identified based on loss of the habitat” was added with regard to coastal California gnatcatcher.
- Page 3.2-21. An explanation as to why impacts to sensitive reptile species would be less than significant was added.
- Page 3.2-22. An explanation as to why indirect dust impacts to vegetation would be less than significant was added.
- Page 3.2-25. References to Subchapter 3.1, Land Use and Planning, and Appendix D were added under Direct Impacts to Off-site Jurisdictional Areas.
- Page 3.2-26. The phrase “prior to issuance of a grading permit” was added with regard to when a Habitat Loss Permit (HLP) would be obtained from the County.
- Pages 3.2-26, 3.2-27 and 3.2-30. The discussion of the North County MSCP Subarea Plan was updated to reflect that a preliminary draft of the North County MSCP Subarea Plan was released for public review on February 19, 2009. If the Proposed Project is approved after the adoption of the North County MSCP Subarea Plan, the Project would be required to make findings of conformance to the Subarea Plan. Such information was added to the text.
- Pages 3.2-27 and 3.2-28. Analysis of Effects Associated With SA 330 Extension was deleted.

- Page 3.2-28. A reference to the “significance guidelines identified in Section 3.2.2” was added under Section 3.2.4, Cumulative Impact Analysis.
- Page 3.2-30. Significant Impact No. 3.2.4a was deleted, as no significant cumulative impacts would occur to sensitive habitats. Similarly, the following sentence was added: “Further, the limitation of the allowable take of Diegan coastal sage scrub habitat to five percent of that remaining as of the date of the HLP ordinance (March 30, 1994) limits cumulative impacts to an amount not considered significant by USFWS and CDFG.”
- Page 3.2-30. The following sentence was deleted: “The Proposed Project would add to the regional cumulative loss of habitat, but is also designed to fully mitigate Diegan coastal sage scrub impacts by permanently preserving 249.62 acres of Diegan coastal sage scrub on site, 106.90 acres of which have been preserved as part of previous agricultural activities.” In addition, the sentence stating, “The related projects listed above would also be required to mitigate for any loss of Diegan coastal sage scrub under the NCCP guidelines or the proposed North County MSCP Subarea Plan,” was modified to state, “The related projects listed above would be required to mitigate for any loss of Diegan coastal sage scrub under the NCCP guidelines or the North County MSCP Subarea Plan once adopted.”
- Page 3.2-31: The sentence stating, “Upon agreement of the hardline for the Project, it would be in conformance with the North County MSCP Subarea Plan hardline,” was modified to state, “Upon adoption of the proposed hardline, the Project would be required to conform with the North County MSCP Subarea Plan.”
- Page 3.2-32. Text within original Section 3.2.5, Effects Found Not to be Significant (On- and Off-site Non-Sensitive Habitats and Wildlife Corridors), was deleted, as it was repetitive.
- Pages 3.2-33, 3.2-34, S-17 through S-19, M-6 and M-7. The sentence “Although not required as mitigation, as part of Project design, an additional [x] acres of this habitat will be retained on site within dedicated open space” was deleted from the mitigation measures for significant impacts to sensitive vegetation communities since it is Project design.
- Pages 3.2-33, S-25 and M-6. Mitigation for Significant Impacts No. 3.2.3c and 3.2.4a was changed to Mitigation for Significant Impact No. 3.2.3c, as 3.2.4a is no longer a significant impact because cumulative impacts were determined to be less than significant.
- Pages 3.2-36, 3.2-37, S-25, M-9 and M-10. Mitigation for Significant Impact No. 3.2.3s was deleted from Page 3.2-36; Mitigation for Significant Impact No. 3.2.3o also will mitigate Significant Impact No. 3.2.3s.
- Pages 3.2-37, S-25 and M-10. Mitigation for Significant Impact No. 3.2.3r was modified from, “Direct impacts to 2.10 acres of off-site agriculture/pasture land shall be mitigated at a 1:1 ratio through the purchase of 2.10 acres of agriculture/pasture land in an approved mitigation bank or area approved by the Director of DPLU,” to: “Direct impacts to 2.10 acres of off-site agriculture/pasture land shall be mitigated at a 1:1 ratio through the purchase of 2.10 acres of mitigation credit in an approved mitigation bank or area approved by the Director of DPLU that is equal to or ‘like functioning’ to the impacted pasture.”

- Pages 3.2-37 and 3.2-38. The conclusion was revised to reflect the above changes made in Subchapter 3.2.

c. *Subchapter 3.3, Noise*

- Page 3.3-2. Under Existing Ambient Noise Levels, a clarification was added that the results from the noise prediction model were consistent “with the existing conditions.”
- Page 3.3-5. The following was added to Significance Guideline 7a: “(thereby exceeding the 60 dB(A) CNEL threshold).” In addition, Significance Guideline 7b is rewritten as follows: “Project implementation would expose existing off-site NSAs to more than a one-dB increase in an identified significant cumulative impact. The Project’s more than one-dB contribution would be a cumulatively considerable impact.” Significance Guideline 7c was deleted.
- Page 3.3-5. The County of San Diego Guidelines for Determining Significance reference was changed from an incorrect reference to “Transportation/Traffic” to the correct reference “Noise.” In addition, a clarification was added to Significance Guideline 7.a. that exceedance of the 60 dB(A) CNEL threshold would result in a significant impact.
- Page 3.3-8. The interior noise analysis for off-site residences was deleted. In addition, text was added to clarify why impacts to off-site residences would be less than significant.
- Pages 3.3-9, 3.3-10, 3.3-12 and 3.3-13. Text within original Section 3.3.5, Effects Found Not to be Significant (Ramona Airport and WRF), was relocated to Section 3.3.3, Analysis of Project Effect and Determination as to Significance.
- Page 3.3-11. Analysis of Effects Associated With SA 330 Extension was deleted.
- Pages 3.3-14, S-27 and M-10. The first bullet under Mitigation for Significant Impact Nos. 3.3.3c and 3.3.3d was clarified to state which lots would be subject to mitigation.
- Pages 3.3-14 and S-27. Within the second bullet under Mitigation for Significant Impact Nos. 3.3.3c and 3.3.3d, “VTM 5020RPL⁵” was changed to “VTM 5020RPL⁶.”
- Pages 3.3-15, S-29 and M-11. Timing of when significant impacts would occur was added under Mitigation for Significant Impact No. 3.3.3e.
- Pages 3.3-15, S-30 and M-11. Clarification was added to Mitigation for Significant Impact No. 3.3.3f that sewer pump station emergency generators would be “required under both Wastewater Management Options 1 and 2.”
- Pages 3.3-15, S-30 and M-12. The location of the water booster pump station was added to Mitigation for Significant Impact No. 3.3.3g. In addition, the following sentence was added to the end: “If necessary, additional architectural features shall be provided to muffle noise (e.g., thicker walls).”
- Page 3.3-16. The conclusion was revised to reflect the above changes made in Subchapter 3.3.

d. *Subchapter 3.4, Cultural Resources*

- Page 3.4-1. A reference to Appendix G was made under Previous On-site Archaeological Surveys.
- Page 3.4-7. A reference to Appendix G was made under Preservation of the Historic Montecito Ranch House.
- Page 3.4-9. Analysis of Effects Associated With SA 330 Extension was deleted.
- Page 3.4-11. Text within original Section 3.4.5, Effects Found Not to be Significant (Archaeological Sites Not Considered Significant Under CEQA and/or RPO), was deleted, as it was repetitive.
- Pages 3.4-14, S-37 and M-15. The following text was added to the first bullet under Mitigation for Significant Impact No. 3.4.3d: “An Historic Structures Evaluation that includes an assessment for the presence of lead-based paint and asbestos shall be conducted, and a report documenting the analysis shall be completed and submitted to the satisfaction of the Director of DPLU. The report shall be prepared following the guidelines provided by the California Office of Historic Preservation.”
- Pages 3.4-16, S-40 and M-17. The term “would” was changed to “shall” under Mitigation for Significant Impact No. 3.4.3f.

d. *Subchapter 3.5, Aesthetics*

- Page 3.5-1. A reference to the slope analysis map prepared by Stevens-Cresto Engineering, Inc. was added.
- Page 3.5-12. A summary of construction-related visual impacts was added. Details were already provided within the text.
- Page 3.5-20. The word “interior” was deleted from the following sentence: “In addition, two four-foot-high masonry walls could be constructed within the proposed right-of-way as mitigation for interior noise impacts to two houses along Montecito Way.”
- Pages 3.5-33 and 3.5-34. Analysis of Effects Associated With SA 330 Extension was deleted.
- Pages 3.5-35 and 3.5-36. Text within original Section 3.5.5, Effects Found Not to be Significant, was deleted as it was duplicative.

3. Modifications to Chapter 4.0, Environmental Effects Found Not to be Significant

The following discussion includes changes in the Final EIR to Sections 4.1.1, Hydrology/Water Quality; 4.1.2, Geology/Soils and Minerals; 4.1.3, Agricultural Resources; 4.1.4, Hazards and Hazardous Materials; 4.1.5, Utilities/Service Systems; 4.1.6, Population and Housing/Growth; 4.1.7, Paleontological Resources; and 4.1.8, Public Services.

a. *Section 4.1.1, Hydrology/Water Quality*

- Page 4-2. The phrase “described above” was deleted and replaced with the term “noted.”
 - Page 4-14. The phrase “less than significant Project-level” was added as a descriptor of short- and long-term contaminants resulting from the Proposed Project.
- b. *Section 4.1.2, Geology/Soils and Minerals*
- Pages 4-16 and 4-20. “Uniform Building Code (UBC)” was replaced with the most up-to-date “International Building Code (IBC).”
 - Page 4-16. The phrase “described above” was deleted.
 - Page 4-19. The phrase “which are standard conditions of the grading ordinance” was added with regard to standard industry measures for surficial materials.
 - Page 4-20. The following was added with regard to mineral impacts: “the Project site is not located within an area of statewide or regional significance related to mineral resources.”
- c. *Section 4.1.3, Agricultural Resources*
- Page 4-23. The phrase “with associated potential impacts included in the above LESA Model evaluation (which evaluates the entire Project site)” was deleted. In addition, the word “sewer” was added to clarify the discussion of off-site facilities.
- d. *Section 4.1.4, Hazards and Hazardous Materials*
- Pages 4-34, 4-35 and 4-49. A paragraph was relocated from Page 4-49 (under Section 4.1.8, Public Services) to Page 4-34 (Fire Hazards). The wording that the Fire Protection Plan was “approved” was changed to “accepted by Ramona Fire District (RFD)/California Department of Forestry and Fire Protection (CDF) on August 26, 2009 and by the County Fire Marshal on October 14, 2009.”
 - Page 4-35. The sentence stating, “The Proposed Project would comply with all access, design, and fuel management policies as specified in the Uniform Fire Code, Article 9 and Appendix II-A, Section 16, as adopted, amended and titled ‘Consolidated Fire Code’ by the CDF/RFD (County 2001), as well as additional fire requirements specified by the CDF/RFD as included in Appendix O,” was changed to state, “The Proposed Project would comply with all access, design, and fuel management policies as specified in the 2009 Consolidated Fire Code (County 2009b), as well as additional fire requirements specified by the Ramona Fire Prevention Bureau Ordinances 07-338 and 07-339 as included in Appendix O.” In addition, the sentence stating, “All development projects must be designed in accordance with the Consolidated Uniform Fire Code (County of San Diego 2001) to minimize fire hazard risks to persons and property,” was altered to state, “All development projects must be designed in accordance with the Consolidated Fire Code (County of San Diego 2009b) to minimize fire hazard risks to persons and property.”
 - Page 4-36. The text was clarified that the Montecito Ranch SPA is outside of the Flight Activity Zone and Runway Protection Zone of the Ramona Airport.

- Page 4-37. The following sentence was added under Emergency Response and Evacuation Plans: “In fact, the Proposed Project would help implement emergency plans by providing a new road (i.e., Montecito Ranch Road) and improving existing roadways and intersections.”
- e. *Section 4.1.5, Utilities/Service Systems*
- Pages 4-39 through 4-42. The existing water supply discussion was revised to reflect the most up-to-date information as of mid-September 2009.
 - Page 4-43. The phrase “if capacity becomes available at the WTP” was deleted from the following sentence: “Wastewater would be transported via pipelines to the Santa Maria WTP, where the wastewater from the Montecito Ranch development would be treated, if capacity becomes available at the WTP.” The following sentence was added to the discussion: “The EIR addressing expansion of the Santa Maria WTP was certified by the RMWD Board on May 25, 2010.” The sentence “Based on annexation requirements ...” was deleted and the phrase “A second option is also under consideration” was deleted from the introduction paragraph which followed.
 - Page 4-44. Information regarding the landfills in the region was added under Solid Waste.
 - Page 4-45. The phrase “(through connection fees)” was added to the end of the following sentence: “The Proposed Project and each cumulative development project within the Santa Maria WTP service area would be required to pay a fair share of the required expansion cost.”
- f. *Section 4.1.5, Population and Housing/Growth*
- Page 4-46. The term “utilities” was replaced with “population and housing/growth” under Guidelines for the Determination of Significance.
- g. *Section 4.1.8, Public Services*
- Page 4-49. The phrase “and has a response time of 10 minutes or less” was deleted with regard to the fire station’s overall response time to eliminate confusion.
 - Page 4-50. The discussion of expanded fire protection services being “funded from increased property taxes and other revenues” was deleted.
 - Page 4-50. Acceptance dates of the Fire Protection Plan were added. In addition, “Consolidated Fire Code” was replaced with “Section 603 of the RMWD Code.”
 - Page 4-51. Changes were made to the Police Protection discussion based on the Law Enforcement Facilities Master Plan and the September 24, 2009 letter from the Sheriff’s Department. The sentence, “The Ramona Substation has indicated that it is in the process of acquiring a parcel to construct a larger station within approximately three to five years,” was replaced with, “A Law Enforcement Facilities Master Plan prepared in 2005 recognized the need to replace the existing substation with a new and larger facility by 2020.” The sentence, “The Ramona Substation is authorized to have 17 patrol deputies, but currently has only 13 due to personnel shortages throughout the department (refer to Appendix O),” was deleted.

- Pages 4-51 and 4-52. The text was modified to state, “It is estimated that the Proposed Project would require the assignment of five additional patrol deputies. A contribution would be made by the Project Applicant to the Sheriff’s Department, consistent with the Public Facilities Element, to fund expanded police protection staff and services...” The discussion of expanded police protection services being “funded from increased property taxes and other revenues” was deleted.
- Page 4-53. The text was modified to state, “The Project Applicant would pay development impact fees to the school district in accordance with either Government Code Section 53080 or Section 65970 prior to the issuance of building permits.” The discussion of the Project contributing a fair share toward school improvements was deleted.
- Page 4-54. The following sentence was deleted under Parklands: “The Project Applicant would work with County staff to develop an agreement regarding the appropriate improvements to be made to the local park.”
- Page 4-56. The cumulative impacts discussion were revised to reflect the above changes to fire and police protection.
- Page 4-57. Text was added to clarify that cumulative impacts to parks could be potentially significant, “excluding the Proposed Project.” In addition, it was clarified that, “Taking all of the Project-proposed parkland and open space into consideration, with the approval of the [Ramona Community Plan] amendment, impacts would be less than significant.”

4. Modifications to Chapter 5.0, Project Alternatives

The following discussion includes changes in the Final EIR to Chapter 5.0, Project Alternatives.

- Page 5-1. Additional information as to what constitutes a “reasonable” alternative was added.
- Page 5-1. The following clarification was added with regard to significant impacts associated with the Proposed Project: “Of those significant effects, significant and unmitigable impacts were identified for two street segments and for construction-period VOC emissions.”
- Page 5-1. Section 15126.6(f)(1) of the State CEQA Guidelines was referenced.
- Page 5-6. Objective 11 was changed to Objective 9 under Section 5.2.3, Rationale for Preference of the Proposed Project Over the No Project/No Development Alternative.
- Page 5-6. A clarification was added stating that dedication of the Montecito Ranch House “would be a requirement of any proposed development during the entitlement process.”
- Page 5-9. The phrase “as shown on Figures 2-1 and 5-2 of the Draft North County MSCP Subarea Plan” was added to the end of the following sentence: “In addition, the development footprint of this alternative would encroach into the proposed MSCP hardline preserve area.”
- Page 5-10. The following sentence was deleted under Section 5.3.2, Comparison of the Effects of the No Project-Development Per Legal Parcels Alternative to the Proposed Project: “Because no water storage tank would be constructed for this alternative, no associated impacts would occur to the potential CEQA- and/or RPO-significant site near the proposed tank pad.”

- Page 5-11. The phrase “or directly,” as well as the associated “or 8,” was deleted with regard to coastal California gnatcatcher impacts.
- Page 5-14. The phrase “as shown on Figures 2-1 and 5-2 of the Draft North County MSCP Subarea Plan” was added to the end of the following sentence: “Similar to the Proposed Project, the development footprint of this alternative would not encroach into the proposed MSCP hardline preserve area.”
- Page 5-14. The sentence stating, “Additionally, significant impacts would occur to two homes located along Montecito Way, due to increased interior noise levels greater than 45 dB(A) CNEL, as assessed for the Proposed Project,” was revised to state, “Additionally, significant impacts would occur to two homes located along Montecito Way, due to increased noise levels, as assessed for the Proposed Project.”
- Pages 5-14 and 5-15. The following sentence was deleted: “This would include potential impacts to the lithic scatter within the water storage tank pad.” In addition, the comparison of the Reduced Development Footprint Alternative to the Proposed Project was relocated.
- Page 5-18. The phrase “as shown on Figures 2-1 and 5-2 of the Draft North County MSCP Subarea Plan” was added to the end of the following sentence: “Similar to the Proposed Project, the development footprint of this alternative would not encroach into the proposed MSCP hardline preserve area.”
- Page 5-18. The following sentence was added under Section 5.5.2, Comparison of the Effects of the Reduced Density Alternative to the Proposed Project: “The reduction in ADT (less than 280 homes) generated by this alternative would eliminate the need to improve Montecito Road...”
- Page 5-19. The sentence stating, “Additionally, significant impacts would occur to two homes located along Montecito Way, due to increased interior noise levels greater than 45 dB(A) CNEL, as assessed for the Proposed Project,” was revised to state, “Additionally, significant impacts would occur to two homes located along Montecito Way, due to increased noise levels, as assessed for the Proposed Project.”
- Page 5-19. The following text was deleted: “...with one exception. If the off-site water storage tank is not needed under this alternative due to use of water wells or another alternate water supply system, then the cultural resource impacts associated with the water storage tank for the Proposed Project would be avoided.”
- Page 5-20. “Biological resources” was added to the list of environmental issue impacts that would be reduced under the Reduced Density Alternative when compared to the Proposed Project. In addition, the term “potentially” was added to the text regarding the feasibility of implementation of the Reduced Density Alternative.
- Page 5-20. Additional description was added to Section 5.6.1, Closed Water System Alternative Description and Setting.
- Page 5-21. The phrase “and homes also would be painted” was added under Section 5.6.2, Comparison of the Effects of the Closed Water System Alternative to the Proposed Project, to the following sentence: “Short-term construction-related air quality impacts associated with the

Closed Water System Alternative would be similar to those associated with the Proposed Project, because the area of disturbance would be the same.”

- Page 5-21. The phrase “as shown on Figures 2-1 and 5-2 of the Draft North County MSCP Subarea Plan” was added to the end of the following sentence: “Similar to the Proposed Project, the development footprint of this alternative would not encroach into the proposed MSCP hardline preserve area.”
- Pages 5-21 and 5-22. The Cultural Resources discussion under Section 5.6.2, Comparison of the Effects of the Closed Water System Alternative to the Proposed Project was modified to the following: “Impacts to cultural resources would be the same under the Closed Water System Alternative as the Proposed Project.”
- Page 5-22. Section 5.6.3, Rationale for the Preference of Proposed Project Over the Closed Water System Alternative, was modified to state that impacts to cultural resources under the Closed Water System Alternative would be similar to those of the Proposed Project.
- Page 5-22. A sentence under Subchapter 5.8, Alternatives Considered and Rejected, was modified to state, “These alternatives include three on-site development alternatives and one off-site road alternative, as well as a reduced grading per day alternative.”
- Pages 5-23 through 5-26. Explanations as to why the Alternatives Considered and Rejected were not considered reasonable alternatives were added.
- Pages 5-26 through 5-49 and 5-52 through 5-59. Since circulation of the Draft EIR, there has been a change in approach to potential future alignment of SA 330 south of Montecito Road. In the Draft EIR, this section of the Circulation Element (CE) road was addressed in two formats within Chapter 5.0, Alternatives (Section 5.8.6). The alignment joined a Project-proposed realignment of SA 330 north of Montecito Road and westerly of the alignment shown in the adopted CE. As detailed in the Draft EIR, this alternative was eliminated from detailed consideration due to lack of substantial reduction in significant impacts associated with the Proposed Project. Although not serving as a Project alternative, the Draft EIR also included detailed impact information in order to provide public circulation of relevant environmental effects should the County move forward at a later date with implementation of the roadway. Based on agency coordination regarding comments received from the Ramona Airport following close of public review, the proposed realignment of SA 330 south of Montecito Road has been dropped from further consideration at this time. As a result, all data related to alternative analysis of the portion of SA 330 south of Montecito Road has been deleted from the Final EIR. The deletion of this information does not affect analysis of the Proposed Project because the deleted information was not relevant to the Proposed Project, but was included to support possible future actions by the County.

Conclusions

Modifications to the Draft EIR for inclusion in the Final EIR are considered minor clarifications. Modifications are highlighted in the Final EIR by text underline and strikeout. Modifications do not show: (1) new significant environmental impacts from the Project or from new mitigation measures; (2) a substantial increase in the severity of environmental impacts; (3) feasible project alternatives or mitigation measures considerably different from others previously analyzed in the Draft EIR, and which the Project proponents decline to adopt; or (4) that the Draft EIR was so fundamentally and basically

inadequate and conclusory in nature that meaningful public review and comment were precluded. Modifications to the Draft EIR clarify and amplify information already contained in the document.

Based on the above discussions, none of the changes contained in the Final EIR constitute "significant new information" as defined in Section 15088.5 of the State CEQA Guidelines. Failure to recirculate would not deprive the public of a meaningful opportunity to comment on substantial adverse effects or feasible mitigation measures or alternatives. The described revisions in the Final EIR therefore do not require recirculation.

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