County of San Diego

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December 12, 2024

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

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

   Bradley Court Convalescent Center Major Use Permit Modification; PDS2021-MUP-85-053W2

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

3. a. Contact: Daniella Hofreiter, Planning Manager
   b. Phone number: (619) 629-4431
   c. E-mail: DaniellaT.Hofreiter@sdcounty.ca.gov.

4. Project location:

   The Bradley Court Convalescent Center Expansion Project (project) is located on 3.4 acres at 675 East Bradley Avenue in the Lakeside Community Plan Area within unincorporated San Diego County (Assessor's Parcel Number 387-142-36-00). The project location's regional location and vicinity are shown in Figure 1 and Figure 2.

5. Project Applicant name and address:

   El Cajon Real Estate, LLC
   6 Hutton Centre Drive, Suite 400
   Santa Ana, CA 92707
   Mr. Thomas Jurbala
   ThomasJurbala@LifeGen.com

6. General Plan
   Community Plan: Lakeside
   Regional Category: Village

Land Use Designation:	Village Residential (VR-24)
Density:	-
Floor Area Ratio (FAR)	-

7. Zoning

Use Regulation:	Residential – Urban (RU)
Minimum Lot Size:	6,000 square feet
Special Area Regulation:	C

8. Description of project:

A Major Use Permit Modification is required for the proposed project. The project involves expanding the existing Bradley Court Convalescent Center to construct a new 25,515 square-foot assisted living building with 66 resident beds, and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds. The total project site would include four buildings with 87 skilled nursing beds and 66 transitional care beds, for a total of 153 beds. The existing residential building would be converted to a controlled access building.

New sewer, domestic water, and fire water (including one additional fire hydrant) would be provided with the sitework. Two trash enclosures for refuse and recycled goods would be provided. Along with new landscaping throughout the facility, site lighting would be installed to provide a minimum of 1.0 FC of lighting along all egress paths to the public way.

The site currently takes access from Bradley Avenue, a County maintained road, via a single full access driveway on the west side of the Project site. This driveway is proposed to be relocated eastward to be more centered to the project site. The proposed project would include a new fire lane access road allowing access to the rear of existing Building 2 and the new Building 3. A new driveway approach along Bradley Avenue would be placed for full fire truck access. The existing parking area would be redesigned to accommodate the proposed buildings and provide 73 parking spaces, including 3 electric vehicle (EV) charging spaces. Access would continue to be provided off East Bradley Avenue.

The Transitional Care Building, located on the northern portion of the site, would be served by packaged terminal air conditioning (PTAC) units and split systems. The Skilled Nursing Building, located on the southern portion of the site, would be served by rooftop heating, ventilation, and air conditioning (HVAC) units. The project would include a 150-kW generator with enclosure to the southeast location of the existing generator, which would be removed. The project would also include a can wash; no mechanical equipment would be associated with the can wash.

The project would be served by Padre Dam Municipal Water District for sewer and with imported water from Helix Water District. Fire service would be provided by the San Miguel Fire Protection District.

Project construction would begin in April 2025 and be completed by June 2026. The proposed development would require site preparation and grading. An estimated 4,279 cubic yards of soil would be cut and recompacted on site. An additional estimated 4,909 cubic yards of fill would be imported to the project site. Staging would occur at the perimeter of the new buildings and the north court 'green' space of the existing building. The project is assumed to be operational in 2026.

The site is subject to the Lakeside Community Design Review, and the General Plan Category Village, Land Use Designation Village Residential (VR-24). Zoning for the site is Urban Residential (RU) with special designator "C". Access would continue to be provided off of East Bradley Avenue.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project is located in the Lakeside Community Plan Area within unincorporated San Diego County, immediately southwest of the City of El Cajon border. The project site is bounded by East Bradley Avenue to the north, North Mollison Avenue and Greenfield Drive to the east and south, and Sams Hill Road to the west. The project site is in a developed area with mobile home residences (RMH9) across East Bradley Avenue to the north; multi-family residences (RU and RV) to the east, south, and west; and commercial uses (C32) to the east and west.

The project site has a gentle rising slope from north to south, rising from an elevation of approximately 442 feet at the northern portion of the entrance to approximately 470 feet at the southern portion of the site. The project site is located approximately 0.4 mile east of State Route 67.

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

Permit Type/Action	**Agency**
Air Quality Permit to Construct	Air Pollution Control District (APCD)
County Right-of-Way Permits Construction Permit	County of San Diego
Fire District Approval	San Miguel Fire Protection District
General Construction Storm water Permit	RWQCB
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
Landscape Plans	County of San Diego
Sewer District Approval	Padre Dam Municipal Water District
Site Plan	County of San Diego
Water District Approval	Helix Water District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES	NO
☒	☐

Note: Conducting consultation early in the California Environmental Quality Act (CEQA) process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology & Soils	☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☐ Hydrology & Water Quality	☐ Land Use & Planning	☐ Mineral Resources
☒ Noise	☐ Population & Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities & Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

☐ On the basis of this Initial Study, PDS finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ On the basis of this Initial Study, PDS finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ On the basis of this Initial Study, PDS finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature	December 12, 2024 Date
Daniella Hofreiter Printed Name	Planning Manager Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS.

Except as provided in Public Resources Code §21099.

a) Would the project have a substantial adverse effect on a scenic vista?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

Less Than Significant Impact: As described in the General Plan Update (GPU) Environmental Impact Report (EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building in the unincorporated community of Lakeside. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. Sky Ranch Park is the nearest open space area to the project site, located approximately 0.62-mile northeast within the City of Santee. Other RCAs identified within the Lakeside Community Plan are located more than 4 miles away from the project site, including Sycamore Canyon (#56 of the Lakeside Community Plan), San Vicente Reservoir (#57 of the Lakeside Community Plan), and El Captain Reservoir (#58 of the Lakeside Community Plan). Due to distance and intervening highways, structures, and topography, no impacts would occur to these RCAs. Additionally, given the urban environment surrounding the project site, the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less than Significant Impact: The project site is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. The nearest designated State scenic highway is a portion of SR-125 located over 4 miles southwest of the project site. The project is located approximately 1 mile north of I-8 and approximately 1.1 miles southeast of the terminus of SR-52, both of which are identified as eligible for designation as a State Scenic Highway. I-8 is also listed as a Scenic Highway in the County's Conservation and Open Space Element of the General Plan. Due to distance, topography, and intervening structures, the project site is not visible from these highways. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and will not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

Less Than Significant Impact: The project site is located in an urbanized area and is surrounded by mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building on an existing developed site, which is consistent with the Urban Residential land use and zoning designations for the project site. The project would be required to include preparation of Landscape Plans pursuant to the

County's Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The project would also be in conformance with the County's Parking Design Manual, Grading Ordinance, and the Lakeside Design Guidelines, the requirements of the C Designator for the Gillespie Airport Land Use Compatibility Plan Area. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality.

d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project is located within Zone B as identified by the San Diego County Light Pollution Code. Zone B is any area of the unincorporated County that is not within 15 miles from the Mount Palomar or Mount Laguna observatory. The project would not adversely affect nighttime views or astronomical observations because the project would conform to the County's Light Pollution Code (Section 51.201-51.209). The Lighting Plan prepared for the project shows that the proposed lighting would not result in light pollution outside of the project site. Therefore, the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES.

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site is not zoned for agricultural use, nor is the land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning, and a rezone is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site does not contain any forest lands as defined in Public Resources Code § 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site and surrounding area within a radius of 0.25-mile does not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use by the proposed project.

III. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

a) Would the project conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: An Air Quality Report was prepared for the project by Rincon Consultants, Inc. (Rincon Consultants) dated September 17, 2024 (see Appendix A). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The regional air quality standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government's (SANDAG's) growth projections, which are developed based on proposed buildout of land uses identified in the County's General Plan. Because the RAQS and SIP project future air quality conditions based on growth projections assuming buildout of the County's General Plan, it is assumed that a project involving development that is consistent with the growth anticipated by the County's General Plan are consistent with the RAQS and SIP. According to the 2022 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore, can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

The proposed project would add 97 additional bedrooms for assisted living in the Lakeside Community Planning Area. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. Residents of the proposed project are expected to be existing residents in the region that would be relocated to the site; therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the RAQS and SIP. In addition, the construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under Section III(b), and would not violate any ambient air quality standards.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The San Diego APCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the San

Diego APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) will be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and $PM_{2.5}$. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For $PM_{2.5}$, the EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	--- *	55	10*
Nitrogen Oxides (NO_x)	25	250	40
Sulfur Oxides (SO_x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.
*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less Than Significant Impact: Currently, San Diego County is in "non-attainment" status for the NAAQS and CAAQS federal and state Ozone (O_3) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM_{10} and $PM_{2.5}$). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil);

solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute to construction and operational sources of criteria pollutant air emissions. An analysis of estimated construction and operational emissions was completed using SCAQMD's California Emissions Estimator Model (CalEEMod).

Project construction is estimated to take 14 months. On-site emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site emissions related to the project include vendor, hauling, and worker vehicle trips to and from the project site. Emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ would not exceed the County's SLTs during project construction, assuming adherence to applicable regulatory requirements, such as site watering during construction activities as required by the County grading permit and the use of low-VOC paint (50 g/L for flat coatings and 100 g/L for traffic marking coating) as required by SDAPCD Rule 67.0.1. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment (O_3, PM_{10}, and $PM_{2.5}$) under an applicable federal or state ambient air quality standard. The project's air quality emissions would not exceed the County's SLTs; therefore, as the thresholds were developed to protect the public health that align with ambient air quality standards, air quality impacts on public health would be less than significant, and no mitigation measures would be necessary (see Table 2 below and Appendix A).

Table 2. Estimated Project Construction-Related Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	31	100	No
Fine Particulate Matter ($PM_{2.5}$)	17	55	No
Nitrogen Oxides (NO_x)	58	250	No
Sulfur Oxides (SO_x)	<1	250	No
Carbon Monoxide (CO)	46	550	No
Volatile Organic Compounds (VOCs)	12	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

During operation, the project is expected to result in 263 average daily trips (see Section XVII. *Transportation*). Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Criteria air pollutant emissions generated during the operation of project would not exceed San Diego County SLTs for VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Air quality impacts would be less than significant, and no mitigation measures would be necessary (see Table 3 below and Appendix A).

Table 3. Estimated Project Operational Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	2	100	No
Fine Particulate Matter ($PM_{2.5}$)	<1	55	No
Nitrogen Oxides (NO_x)	1	250	No
Sulfur Oxides (SO_x)	<1	250	No
Carbon Monoxide (CO)	15	550	No
Volatile Organic Compounds (VOCs)	2	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with intensive phases of other construction projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10}. The project's estimated emissions of criteria air pollutants, specifically PM_{10}, were estimated to be 31 lb/day, which is under the County's SLTs of 100 lb/day during construction activities. In addition, due to the highly dispersive nature of PM, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} emissions than the project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The project is proposing development that is consistent with the County's General Plan; thus, operational air emissions are considered to have been accounted for in the General Plan Update EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Thus, the project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

c) Expose sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Less Than Significant Impact: The nearest sensitive receptors to the project site are mobile home residences approximately 125 feet to the north and the multi-family residences approximately 15 to 65 feet to the east, south, and west. The project would generate construction emissions in the vicinity of sensitive receptors.

Carbon Monoxide Hotspot Analysis
As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and federal CO standards. The SDAPCD measured a maximum 8-hour CO concentration of 1.4 parts per million (ppm) inn 2020 (SDAPCD 2021). CO concentrations were well below the federal standard 8-hour standard of 9 ppm.

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. The traffic study prepared for the project studies three intersections in the vicinity of the project site (Appendix I). The project would add 263 daily trips (which includes all project generated trips, including trucks), which include 19 AM peak hour and 26 PM peak hour trips Subsequent to the completion of the traffic study, the project size was reduced from 101 to 97 additional beds. Therefore, the analysis in this report reflects the 101 additional beds, which results in a conservative analysis.

The additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E. The traffic study concluded that the proposed project would not result in any significant intersection impacts (Appendix I). Therefore, a CO hotspot analysis is not required for the proposed project and project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)
Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 14 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site $PM_{2.5}$ emissions, which are used to represent DPM emissions for this analysis,4 would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for approximately two months, which represents less than one percent of the typical health risk calculation periods of 9 years, 30 years, and 70 years. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual.

Lastly, mobile emissions during project operations would primarily be composed of passenger and light-duty vehicles (55.4 percent) and light trucks (6.3 percent) accessing the proposed buildings and parking lot, as shown in Table 9 below. Approximately one percent of the vehicles visiting the project site would be heavy trucks according to CalEEMod, which takes fuel and consumer goods delivery trucks into account. Delivery truck trips would be made to the project site based on a schedule, and additional heavy-duty trucks driven by project customers may occur as well. However, the project is designed to primarily serve customers in light autos and trucks. The project would not attract a substantial number of trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the passenger vehicle-serving nature of the proposed use.

The proposed project would have a 150-kilowatt diesel generator on-site, which would be permitted by the SDAPCD. The on-site generator would comply with SDAPCD guidelines and would be tested and maintained 52 hours per year and would be required by the permit to be below health risk thresholds. Additionally, the proposed project land use type is not typical of a TAC emitter and would not constitute a cancer risk to sensitive receivers. Therefore, construction and operation of the proposed buildings and parking lot would not generate significant amounts of TACs that would adversely impact sensitive receptors in the vicinity of the project site.

As discussed in Section III(b), the proposed project would not result in construction or operational emissions that would exceed the County's SLTs for health risk. Thus, neither construction nor operation of the project would expose sensitive receptors to an incremental health risk.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a "considerable" number of persons in the area would be considered a significant, adverse odor impact.

The project would involve the temporary use of diesel-powered construction equipment, which would generate exhaust that may be noticeable for short durations at adjacent properties. However, construction activities would be temporary, and construction emissions would not exceed San Diego County SLTs.

The land use and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. The proposed operations of the buildings and parking lot are not typically associated with objectionable odors.

The sensitive receivers nearest to the project site are the mobile home residences approximately 125 feet to the north, and the multi-family residences approximately 15 to 65 feet to the east, south, and west. It is unlikely that the odors from the proposed project would be distinguishable from existing sources, given the vehicle emissions associated with adjacent roadways and State Route 67 in the vicinity of the project site. Furthermore, odors generated from proposed uses would dissipate and be reduced with increasing distance from the project site. Therefore, the project would not generate objectionable odors.

IV. BIOLOGICAL RESOURCES.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or CDFW, or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Biological Resources Letter Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix B). Due to the limited biological resources on site, extensive surrounding development, and absence of native vegetation communities, wetlands, and sensitive species, a full Biological Resources Report was not warranted. The Biological Resources Letter Report consists of a literature review and results of a field reconnaissance survey conducted on November 11, 2021. The following responses have incorporated the analysis from the report.

Less than Significant with Mitigation Incorporated: The Biological Resources Letter Report determined that the project site consists of urban/developed land and disturbed habitat. The project site contains 1.36 acres of urban/developed land cover including the special care facility, the driveway off Bradley Avenue, and the parking lot. Some of the observed ornamental vegetation during the site survey included Brazilian pepper (*Schinus terebinthifolius*), fan palm (*Washingtonia sp.*), queen palm (*Syagrus romanzoffiana*), blue jacaranda (*Jacaranda mimosifolia*), and Canary Island pine (*Pinus canariensis*). Disturbed habitat and urban/developed land cover are classified as Multiple Species Conservation Program (MSCP) Tier IV habitat (considered as being the least sensitive tier) and are not considered sensitive by state or federal agencies. Approximately 2.11 acres of disturbed habitat occur on site. Some

disturbed habitat species from the field survey included Russian thistle (*Salsola tragus*), iceplant (*Carpobrotus edulis*), ripgut brome (*Bromus diandrus*), black mustard (*Brassica nigra*), and slender wild oat (*Avena barbata*). The field survey conducted for the Biological Resources Letter Report identified sparsely scattered elements of Diegan coastal sage scrub species; however, these species were not expansive or dominant enough to constitute a distinct vegetation community within the project site. Individual species such as coyote brush (*Baccharis pilularis*), mulefat (*Baccharis salicifolia*), coast live oak (*Quercus agrifolia*), wild cucumber (*Marah macrocarpa*), and coast prickly pear (*Opuntia littoralis*) were found in the along the eastern and southeast edges of the site, within disturbed habitat and bare ground, abutting urban/developed areas.

The project site contains habitat for wildlife species that commonly occur within urban areas, including house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), and yellow-rumped warbler (*Setophaga coronata*). Small rodent burrows were also observed along the north, east, and southeast edges/berms of the project site; mammal species were not visually observed. Large mammals such as mule deer (*Odocoileus hemionus*) are not expected to utilize or move through the project site due to the urbanized condition of the project site.

The CNDDB results include 30 special-status plant species within five miles of the project site. The IPaC results include six federally listed plant species that are recorded in the vicinity of the project site. No special-status plant species were observed on the project site and the field survey confirmed the absence of suitable habitat for listed special-status plant species identified within the South County MSCP Subarea Plan (County of San Diego 2006).

The CNDDB results include 49 special-status wildlife species within five miles of the project site. The IPaC results include six federally listed wildlife species that are recorded in the vicinity of the project site. The potential for special-status animal species to occur on the project site was assessed based on known distribution, habitat requirements, and existing site conditions. No federal or state listed, or otherwise special-status animal species were observed or are expected to occur within or near the project site due to lack of suitable habitat. Additionally, no County Group 1 and 2, and County List A, B, C, and D animal species are expected to occur within the project site (County of San Diego 2006).

Although various locally common raptors are known to occur in the vicinity of the project area (such as red-tailed hawk [*Buteo jamaicensis*], red-shouldered hawk [*Buteo lineatus*], Cooper's hawk [*Accipiter cooperii*], American kestrel [*Falco sparverius*], and others), these bird species are recognized as tolerant of human presence, and none are listed as Rare, Threatened, or Endangered by either the state or federal governments. No raptors would be dependent on any resources provided solely by the project site. No highly sensitive raptors, such as prairie falcons (*Falco mexicanus*) or golden eagles (*Aquila chrysaetos*), would utilize the project site, given its location, current use, small size, and proximity to existing development. For these reasons, the project site does not constitute high-value raptor foraging or nesting habitat, and the project site does not constitute a significant biological resource with respect to local raptors.

The Quino checkerspot butterfly (*Euphydryas editha quino*) (Quino) is a federally endangered butterfly species native to southern California. Optimal habitat for Quino is characterized by patchy shrub or small tree landscapes with openings of several meters between large plants, or

a landscape of open swales alternating with dense patches of shrubs and appears to contain little or no invasive exotic vegetation (USFWS 2021). Rincon's biologist did not observe Quino during the field reconnaissance survey and confirmed that the project site does not contain suitable habitat or preferred host plants for this species. Therefore, Quino is not expected to occur on site.

Based on the determinations of the Biological Resources Letter Report, no designated critical habitat for special-status wildlife species exists at the project site. Sensitive biological resources on site include trees and other structures suitable for nesting birds. Given the potential for urban-adapted birds to nest within the ornamental trees and shrubs on-site, MM BIO-1 is recommended to avoid potential impacts to nesting birds from implementation of the project. With implementation of MM BIO-1, project impacts to species identified as a candidate, sensitive, or special status species would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less than Significant Impact: The project site is located in a highly urbanized setting, as residential and commercial development surrounds the project site. The nearest relatively natural habitat occurs approximately 350 feet southwest of the project site. This relatively natural habitat is comprised of open space but is isolated by surrounding development. The project site does not support any federal or state defined and regulated aquatic features wetlands. Therefore, the project would not have any substantial adverse effect on any riparian habitat, and project impacts to regulated (or non-regulated) aquatic habitat would be less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The A Biological Resources Letter Report did not conduct a formal jurisdictional delineation for the project site. Based on the desktop review and field reconnaissance survey, no state or federally defined unvegetated streams, swales, riparian/riverine habitat, wetland vernal pools, or potential vernal pools occur within the project site. The closest mapped feature is a riverine intermittent stream bed that is seasonally flooded. The streambed's most southern extent is located approximately 0.48 mile north of the project site at the intersection of Pepper Drive and Rockview Drive. The project would not impact by discharging into, directly removing, filling, or hydrologically interrupting, any federally protected wetlands near the project site. The preparation of a Stormwater Pollution Prevention Plan

(SWPPP) and associated best management practices (BMPs) would occur in accordance with the General Construction Permit for stormwater discharges to avoid indirect effects to downstream drainages (see Section X(a)). Additionally, project construction activities would occur in accordance with the County's Grading Ordinance to avoid erosion and sedimentation impacts on the ephemeral drainages. Therefore, no significant impacts would occur to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the USACE.

The Project would not impact state or federally protected wetlands and thus, would not contribute to a cumulative impact for such habitats.

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

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The Biological Resources Letter Report determined that the project site is not positioned inside a conservation planning linkage zone; the closest wildlife core linkage is located 23 miles northeast of the project site. The project site is surrounded by suburban homes and commercial development; therefore, the project site does not support any wildlife corridors or linkages. Due to the existing developed nature of the site the proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites. Therefore, no impact would occur.

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

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project site is located in the North Metro-Lakeside-Jamul Segment of the South County MSCP Subarea Plan. This plan does not identify the project site as being subject to habitat conservation. The proposed expansion of the existing development on the project site would therefore be in compliance with this or any other future habitat conservation plan insofar as all project impacts are mitigated to less than significant levels. Impacts to urban/developed land cover and disturbed habitat vegetation community types that occur within the project site do not have a grouping of ten or more individual plant species and do not require mitigation per the County's Biological Mitigation Ordinance. The project site does not contain any native or sensitive vegetation communities; therefore, future development at the site is not expected to conflict with the conservation goals of the MSCP, previously defined, nor any other local, regional, or state habitat conservation plan. Therefore, no impact would occur.

Mitigation Measures

BIO-1 Common, urban-adapted birds could potentially nest within the ornamental trees and shrubs on site. Therefore, the following measure is recommended to maintain compliance with the California Fish and Game Code and Migratory Bird Treaty Act with respect to nesting birds:

If initial clearing activities take place between February 15 and August 15, nesting bird surveys are recommended to be performed by a qualified biologist/ornithologist with results reported subsequently to the County prior to grading and clearing. If nesting birds are found, a County-approved construction buffer may be required until all young are determined no longer dependent on the nest.

V. CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Cultural Resources Technical Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted. The following responses have incorporated the analysis from the report.

Less Than Significant Impact: A Cultural Resource Assessment and Historical Evaluation was completed for the proposed project by Rincon Consultants. The project site is located in an area of sensitivity for prehistoric resources; however, no prehistoric resources were identified as part of the pedestrian survey completed for this project. The existing buildings on the project site are not recommended eligible for listing in the National Register of Historic Places or California Register of Historical Resources or for designation to the County of San Diego Historic Register, and therefore are not considered a historical resource as defined by CEQA. Further, the California Historical Resources Information System records search and a review of County of San Diego Historic Register failed to identify any other cultural resources, including historic districts, within close proximity to the project site. Because the resources are not considered significant historic resources pursuant to CEQA Guidelines §15064.5, loss of these resources cannot contribute to a potentially significant impact. Impacts would be less than significant.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: Archaeological resources were identified during the Cultural Resource Assessment prepared by Rincon Consultants. The Sacred Lands File search from the Native American Heritage Commission for the project identified 21 previously conducted cultural resources studies within a 0.5-mile radius of the project site, of which one included the entire project site. Additionally, the records search identified 16 previously recorded cultural resources within a 0.5-mile radius of the project site, none of which occur within the project site; however, one prehistoric resource is recorded within approximately 0.2-mile of the project site, and an undocumented prehistoric milling complex immediately southwest of the project site. Additionally, previous cultural resources studies within the vicinity recommend archaeological and Native American monitoring due to the presence of previously recorded resources and general sensitivity of the area. Based on the records search from the Cultural Resource Assessment, the project site is considered to have a moderate sensitivity for archaeological resources. Impacts would be reduced to less than significant with the implementation of MM CUL-1 through MM CUL-4, which would include a worker's environmental awareness program should by conducted prior to earthmoving activities, archaeological monitoring during ground disturbing activities by a qualified archaeologist, and provisions for unanticipated discoveries of cultural resources during project implementation.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☒	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant With Mitigation Incorporated: Based on an analysis of records and a survey of the property by Rincon Consultants, it has been determined that the project is not likely disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains**.** In the unlikely event that human remains are encountered onsite during earth-disturbing activities, MM CUL-2 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed. With implementation of MM CUL-2, potential impacts to disturbance of human remains would be less than significant.

Mitigation Measures

CUL-1 Prior to any clearing, grubbing, trenching, grading, or any land disturbances, the County-approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content

Requirements for Cultural Resources. The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring requirements. The Department of Public Works, Private Development Construction Inspection shall confirm the attendance of the approved Project Archaeologist.

CUL-2 The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.

b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:

   1. The Project Archaeologist or the Kumeyaay Native American monitor 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.
   2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
   3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
   4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
   5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
   6. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) “unique” cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

c. **Human Remains.** If any human remains are discovered:

1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

d. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

The Department of Public Works, Private Development Construction Inspection shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The Department of Public Works, Private Development Construction Inspection shall contact the Planning & Development Services, Project Planning Division if the Project Archeologist or applicant fails to comply with this condition.

CUL-3 Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2) and issuance of any building permit, the Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.

b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

The applicant shall submit the Archaeological Monitoring Report to Planning & Development Services, Project Planning Division for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the report or field monitoring memo for compliance with the project MMRP, and inform Department of Public Works, Private Development Construction Inspection that the requirement is completed.

CUL-4 Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

a. Department of Parks and Recreation Primary and Archaeological Site forms.
b. Daily Monitoring Logs
c. Evidence that all cultural materials have been conveyed as follows:
    1. Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.
    or
    Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
    2. Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the

curation facility stating that the historic materials have been received and that all fees have been paid.

d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

The applicant's archaeologist shall prepare the final report and submit it to Planning & Development Services, Project Planning Division for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, Planning & Development Services, Project Planning Division shall inform Planning & Development Services, Land Development Review and Department of Public Works, Private Development Construction Inspection, that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then Planning & Development Services, Project Planning Division shall inform Planning & Development Services *or* Department of Public Works, Fiscal Services to release the bond back to the applicant.

VI. ENERGY.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

During construction, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of construction activities. Construction would be conducted in compliance with local, state, and federal regulations (e.g., United States Environmental Protection Agency [USEPA] and the CARB engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible.

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project

would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, a high-reflectivity cool roof, and landscaping with climate adapted plants that require little-to-no water. Additional measures such as efficient water usage, high-efficiency LED street and area lighting, recycling, and composting, would be employed by the project. Additionally, the applicant proposes to install solar photovoltaic (PV) panels, which would minimize the electricity demand from the power grid. Therefore, the construction and operation of the project is not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

The proposed Project would use only the amount of energy necessary for the construction and operation of the proposed 97 skilled nursing and assisted living units that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. The proposed residences would also include rooftop solar systems to generate renewable energy and energy efficient features as described further in Section VI(b) below. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The Project would be required to implement renewable energy and energy efficiency measures as required by state law and county sustainability measures, including but not limited to:

a. Low-flow plumbing fixtures.
b. A high-reflectivity cool roof.
c. Incorporation of Title 24 energy standards.
d. Landscaping in compliance with the County's Water Conservation in Landscaping Ordinance.
e. Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
f. Composting in compliance with the County’s Strategic Plan to Reduce Waste (2017).
g. High-efficiency LED street and area lighting.
h. Solar PV provisions consistent with the requirements for residential land uses.
i. EV charging spaces in compliance with EV requirements in the most recently adopted version of CALGreen.

See Section VIII. Greenhouse Gas Emissions for a detailed list of the project design features that would be incorporated into the project to reduce energy demand. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is not located on or in proximity to any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Coronado Bank, San Jacinto, Elsinore and San Andreas Fault Zones (California Department of Conservation 2022). Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: To ensure the structural integrity of the proposed buildings, the project must conform to the Seismic Requirements as outlined within the California Building Code and the County Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. The project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, compliance with the Grading Plan, Geotechnical Investigation prepared by the registered Civil Engineer, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill or located within a floodplain. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The project site is not within a low/generally susceptible category "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (URS 2004). Landslide risk areas from the MJHMP were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on U.S. Geologic Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. The project site is currently developed and relatively flat. Therefore, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils onsite are identified as Placentia sandy loam that have a soil erodibility rating of "moderate" to "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. Construction of the project would include site grading, which has the potential to release sediment into downstream

receiving waters. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) and a Hydrology Report dated April 2, 2024 and June 10, 2024, respectively, prepared by Kimley-Horn and Associates, Inc. for the project (see Section X, Hydrology and Water Quality).
- The project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project proposes the expansion of the existing site with a new assisted living building and skilled nursing building. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Additionally, contaminated soils would be removed from the project site (see Section IX, Hazards and Hazardous Materials), and MM HAZ-2 would require these soils to be replaced by compacted fill in layers to ensure the structural integrity of the proposed structures. In addition, a Soils Engineering Report is required as part of the Building Permit process to assure that the proposed buildings are adequately supported. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. Therefore, the Grading Plan prepared by the registered Civil Engineer and compliance with the Grading Ordinance and MM HAZ-2 ensure the project would not result in a potentially significant impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII(a)(iii) through (iv) listed above.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Based on the Preliminary Review of Resources by PDS, the project site is not located within a High Shrink Swell Zone, which would indicate expansive soils. The project site and surrounding areas are currently developed with existing structures. Therefore, the project would not create a substantial risk to life or property and impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project would rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. Therefore, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

Less Than Significant Impact: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that have a low or marginal potential and sensitivity for paleontological resources. Additionally, the project site and surrounding areas have been previously extensively disturbed and are currently developed with existing structures. Therefore, the project is not anticipated to destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Greenhouse Gas Memorandum was prepared for the project by Rincon Consultants, dated November 30, 2024 (Appendix D). The following responses have incorporated the analysis from the report.

Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, and ocean and terrestrial species impacts, among other adverse effects.

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact.

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064.4[b]).

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

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. This CAP's GHG inventory assists in setting the project-specific GHG threshold, described below.

Less Than Significant Impact: A project-specific GHG efficiency threshold can be calculated to represent the rate of emissions reduction necessary for the proposed project to meet the County's 2030 reduction targets. The project is estimated to be operational by 2026. The 2026 GHG emissions target is an efficiency threshold generated by dividing the County of San Diego's GHG emissions target for 2026 by the County's service population projections (residents plus employees) for that year.

Estimated Construction-Related GHG Emissions

Construction of the project would generate temporary GHG emissions primarily from operation of construction equipment onsite, from vehicles transporting construction workers to and from the project site, and heavy trucks to import earth materials onsite. Construction equipment used for site preparation and grading typically generate the greatest amount of construction emissions.

Project construction is estimated to take 14 months. Emissions associated with the construction period were estimated in CalEEMod based on the projected maximum amount of equipment that would be used onsite at any given time during construction activities. Proposed development would require site preparation and grading, building construction, paving, and architectural coating. A total of 4,279 cubic yards of soil would be graded and recompacted on the project site and an additional 4,909 cubic yards of fill would be imported.

The CalEEMod air quality modeling conducted for the project determined that construction of the project is estimated to generate a total of 403 metric tons (MT) of carbon dioxide equivalent

(CO_2e). When amortized over a 30-year period[1], construction of the project would generate about 13.4 MT CO_2e per year.

Estimated Operational GHG Emissions

CalEEMod calculates operational emissions from the project, which include carbon dioxide (CO2), nitrogen oxide (N2O), and methane (CH4). For mobile sources, CO2, N2O, and CH4 emissions from vehicle trips to and from the site were quantified using CalEEMod. Trip generation rates were sourced from the Transportation Analysis prepared by Linscott, Law & Greenspan, Engineers (Appendix I). The trip generation rates in CalEEMod were adjusted to be consistent with the Transportation Analysis' estimated 263 daily vehicle trips generation. The project would include three parking spaces with EV chargers, which would reduce GHG emissions annually through encouraging the use of EVs over gasoline-powered vehicles. One EV charging station is estimated to reduce approximately 39,125 vehicle miles traveled (VMT) annually. The analysis estimates 72 trees and 264 plants would be implemented throughout the project site and would sequester GHG emissions.

Operation of the proposed project is estimated to generate a total of 253 MT CO_2e per year. When combined with the amortized construction emissions (13.4 MT CO_2e per year), the total annual emissions associated with the project would be approximately 266.4 MT CO_2e or 2.75 MT CO_2e per service population per year, which would not exceed the 2026 project-specific efficiency threshold of 3.29 MT CO_2e per service population per year. Therefore, impacts would be less than significant.

[1] Consistent with the industry standard and per SCAQMD guidance, total construction GHG emissions resulting from a project were amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of the project.

Additionally, the project would implement the following design features (included as conditions of approval by the County):

1. Low-flow plumbing fixtures, in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
2. A high-reflectivity cool roof.
3. Incorporation of Title 24 energy standards.
4. Landscaping along the frontage of East Bradley Avenue, as well as minor strips of landscaping within the site and boundary.
5. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plan.
6. Comply with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal), which requires recycling of 90 percent of inert and 65 percent of all other materials from construction projects.
7. Comply with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.
8. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.
9. Utilize architectural coatings compliant with SDAPCD Rule 67.
10. Install high-efficiency LED street and area lighting to achieve reduction in overall lighting energy.
11. The Project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI above).
12. The proposed building structures would incorporate photovoltaic (PV) provisions consistent with the requirements for residential land uses.
13. Achieve compliance with EV requirements in the most recently adopted version of CALGreen.
14. The project would have a less-than-significant impact from VMT (see Section XVII below).

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: There are numerous State plans, policies, and regulations adopted to reduce GHG emissions. The principal state plan and policy is Senate Bill (SB) 32 and the California Global Warming Solutions Act of 2006. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. Pursuant to the SB 32 goal and AB 1279, the 2022 Scoping Plan was created to outline goals and measures for the State to achieve the reductions. Additionally, SANDAG adopted San Diego Forward: 2021 Regional Plan in 2021, and the County of San Diego General Plan provides goals and policies to reduce GHG emissions. Therefore, the analysis is based upon the project's consistency with plans and

polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change, including the CARB 2022 Scoping Plan and SANDAG's 2021 Regional Plan.

2022 Scoping Plan

The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

The proposed project would be consistent with these goals through project design that would be consistent with latest California 2022 Energy Code. The proposed building structures would incorporate PV provisions consistent with the requirements for residential land uses. In addition, the 2022 CALGreen Standards state five percent of the total number of parking spaces shall be equipped with Level 2 electric vehicle supply equipment, which is approximately three to four electric chargers. Therefore, the proposed project's three electric chargers would be consistent with the latest CALGreen Standards. The proposed project would be served by San Diego Gas & Electric, which is required to increase its renewable energy procurement in accordance with SB 100 targets. The proposed project is served by San Diego Metropolitan Transit; the project is approximately 120 feet from the nearest transit bus stop, and 0.25 mile from four other bus stops. In addition, the project site is located within 0.5 mile of existing residential and commercial uses, which could encourage alternative modes of transportation such as walking, bicycling, and public transit. In addition, the project would be consistent with the County requirement of recycling 90 percent of inert and 65 percent of all other materials from construction projects, per County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal). Therefore, the proposed project would not conflict with the 2022 Scoping Plan.

San Diego Forward: 2021 Regional Plan

The 2021 Regional Plan provides a framework for meeting goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies and programs would confirm SANDAG's commitment to fully realizing the strategies in the 2021 Regional Plan. The Sustainable Communities Strategy (SCS) envisions a transportation system that is fast, fair, and clean, as well as a region that is resilient to economic and environmental changes. The 2021 Regional Plan polices are built around three core strategies:

- Invest In a Reimagined Transportation System. Build a network and fund services that include multimodal roadways; an expanded network of fast, frequent, and low-cost transit; 21st century technology that manages the entire transportation system and connects people to on-demand services; and zero-emissions options for vehicles and micromobility.
- Incentivize Sustainable Growth and Development. Collaborate with local jurisdictions and fund programs to accelerate housing production while also addressing equity, climate resilience, and mobility.

- Implement Innovative Demand and System Management. Reduce solo driving and congestion through increased remote work, carsharing, vanpooling, pricing strategies and parking management programs that leverage partnerships and technology.

The proposed project would add 97 additional bedrooms for assisted living in the Lakeside Community Planning Area. The proposed project would be consistent with the SANDAG growth projections. Residents of the project are expected to be existing residents in the region that would be relocated to the site; therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. The project is approximately 120 feet from the nearest transit bus stop, and 0.25 mile from four other bus stops. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the 2021 Regional Plan.

San Diego County General Plan

The General Plan provides a consistent framework for land use and development decisions consistent with an established community vision. As the equivalent of a local "constitution" for land use and development, the General Plan's diagrams, goals, and policies form the basis for the County's zoning, subdivision, and infrastructure decisions. The General Plan Conservation and Open Space, and Land Use Element provide the following goals, policies and objectives pertaining to greenhouse gas emissions that are relevant to this analysis:

- COS-14.3: Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.
- COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.
- LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

The project would comply with the latest Title 24 Energy Standards that reduces wasteful, expensive, inefficient or unnecessary use of energy. The project would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems. In addition, the project would be developed approximately 120 feet east of the nearest bus stop, which would provide alternative modes of transportation that could potentially reduce vehicle trips and VMT. Therefore, the project would be consistent with goals and policies in the San Diego County's General Plan to reduce GHG.

Conclusion

A project-specific efficiency threshold was calculated to represent the rate of emissions reduction necessary for the proposed project to meet the County's reduction targets. GHG emissions from project construction and operations would generate 266 MT CO_2e per year or 2.75 MT CO_2e per service population per year, which would be below the 2026 project-specific GHG efficiency threshold of 3.29 MT CO_2e. In addition, the proposed project would comply with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2022 Scoping Plan, 2021 Regional Plan, and the San Diego County General Plan. The project would be consistent with the 2021 Regional Plan since the anticipated residents would be located within the region

and would not increase population growth and housing needs. Consistency with the plans, policies, regulations, and GHG reduction actions/strategies would reduce the project's incremental contribution of GHG emissions. Therefore, the proposed project's GHG impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS.

a) Would the project create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Phase I Environmental Site Assessment was prepared for the project by GeoSoils, Inc. (GSI) dated June 9, 2021 (see Appendix E). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by California Department of Toxic Substances Control, the USEPA, and the San Miguel Fire Protection District. All construction activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Operationally, the project would involve the transport, use, and storage of gasoline and diesel fuel. However, the project will not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances will be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

Given the age of the existing structures on-site, it is possible that Asbestos Containing Materials (ACM) and Lead Based Paint (LBP) are present (Appendix E). Lead is a highly toxic metal that was used up until 1978 in paint used on walls, woodwork, siding, windows, and doors. Lead-containing materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5, the worker health and safety requirements (Title 8 CCR §1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Asbestos was used extensively from the 1940's until the late 1970's in the construction industry for fireproofing, thermal and acoustic insulation, condensation control, and decoration. The USEPA has determined that there is no "safe" exposure level to asbestos. It is, therefore,

highly regulated by the USEPA, the California Environmental Protection Agency (CalEPA), and the California Division of Occupational Safety and Health (CalOSHA). Demolition or renovation operations that involve ACMs must conform to SDAPCD Rules 361.140-361.156. However, the project would not demolish or renovate the existing on-site buildings. Therefore, the proposed project would not create a significant hazard to the public or the environment through the disturbance of ACM or LBP.

Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation: There is one school within 0.25-mile of the project site, Magnolia Elementary School. The project site is located approximately 938 feet (approximately 0.18 mile) northeast from the nearest corner of the school. As described further in Section IX(c), some residual contamination remains in the subsurface at the project site from a previous release of gasoline at the adjoining property (Price Management). In addition, two drums that formerly contained purged groundwater, with petroleum product, still exist on-site. However, a Soil Management Plan specifying the handling of contaminated soil if encountered during excavation and grading activities would be required under MM HAZ-1, to protect human health and the environment. Further, the two drums that exist on-site would be evaluated by an environmental consultant and properly disposed, in accordance with state and local criteria, as required by HAZ-2. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX(a)). Therefore, with implementation of HAZ-1 and HAZ-2, the project would not have a substantial adverse effect on an existing or proposed school.

c) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation: The Phase I ESA prepared for the project determined the adjoining property to the east of the project site, Price Management, had a release of gasoline which migrated onto the project site. Although the case received regulatory closure in 2014, some residual contamination remains in the subsurface at the project site and regulatory

limitations and requirements may exist for site redevelopment. In addition, two drums that formerly contained purged groundwater, with petroleum product, still exist on-site. A Vapor Encroachment Survey was performed as part of the Phase I ESA to evaluate the potential for soil vapors encroachment on the project site from potential risk sites near the project site. The following properties were identified as potential vapor encroachment concerns:

- Price Management
- Bradley Wash and Gas

A Soil Management Plan specifying the handling of contaminated soil if encountered during excavation and grading activities would be required under MM HAZ-1, to protect human health and the environment. Further, the two drums that exist on-site would be evaluated by an environmental consultant and properly disposed, in accordance with state and local criteria, as required by HAZ-2. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX(a)). Therefore, with implementation of HAZ-1 and HAZ-2, the Project would not create a significant hazard to the public or environment.

d) Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less than Significant Impact: The proposed project is located within Zone 6 (Traffic Pattern Zone) of the Gillespie Field Airport Land Use Compatibility Plan (ALUCP), as well as the Airport Overflight Notification Area and the Airport Influence Area (Review Area 1). Gillespie Field in El Cajon is located approximately 0.8-mile northwest of the project site. However, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

e) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

The following sections summarize the Project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project, plant, and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

f) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project is not located within the Wildland-Urban Interface Zone or a very high fire hazard severity zone (FHSZ). As such, the project is not required to prepare a Fire Protection Plan (FPP). The Building Plan for the project is required to be reviewed and approved by the County Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code (see Section XX, Wildfire). Based on review of the project by County staff, and through compliance with the County Fire Code and Consolidated Fire Code, impacts would be less than significant.

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

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (e.g., chicken coops, dairies, etc.), solid waste facility or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

Mitigation Measures

HAZ-1 In order to remediate impacts associate with petroleum hydrocarbons in the soil, as identified in Phase I Environmental Site Assessment (ESA) prepared by Rincon Consultants, dated June 9, 2021 or other contaminated soils discovered during grading or construction, remediation under the supervision of the County DEH, Site Assessment and Mitigation Program (SAM) is required prior to approval of any grading and/or improvement plans. The excavated soil should be stockpiled, tested, characterized for disposal, and transported off-site to an appropriate disposal facility.

For soil testing, a signed, stamped addendum to the Phase I ESA shall be prepared by a Registered Engineer or Professional Geologist. The addendum shall include the following information or as modified by County DEH:

a. Documentation that the soil sampling occurred between 6 inches to 2-3 feet in depth.

b. Findings which identify whether onsite soils in this location exceed regulatory screening levels for soil vapors, petroleum, heavy metals, or other contaminants.

c. If contaminated soils are detected, provide a copy of the contract and a signed sealed statement from the Registered Engineer or Professional Geologist, which states that they will implement the work plan approved by SAM. Grading required to implement the site remediation activities is permitted.

For remediation, a California Licensed Environmental Consultant company shall prepare a Soil Management Plan (SMP), for the remediation of hazardous materials as identified above. The plan shall be prepared and implemented pursuant to the County DEH SAM Manual under direction from the County DEH SAM. As part of the SMP, the following measures shall be implemented:

a. The applicant shall contract with a California Licensed Environmental Consultant to prepare the SMP and implement any required work plan for soil remediation.

b. All required grading work shall comply with the County of San Diego Grading Ordinance 87.101 et. al. If a grading permit is required for the remediation work, it shall be issued for the remediation work only.

c. The County DEH SAM or RWQCB shall oversee the progress of the remediation project.

d. Upon completion of the soil remediation, a "Closure Letter" from County DEH SAM or RWQCB shall be submitted to the PDS Project Planning Division (PPD) for approval. The PDS PPD shall review the closure letter for compliance with this condition.

e. Once contaminated soils are removed, these soils shall be replaced by compacted fill in layers to ensure the structural integrity of the proposed buildings.

f. If the Director of PDS determines the remediation work will take an enormous amount of time that would be detrimental to ultimate project implementation, approval of other engineering plans and/or issuance of other project permits may be permitted as long as there is no risk of effects to public health and safety. Concurrence from the County DEH SAM or RWQCB is required, and the applicant shall enter into a secured agreement for the completion of the remediation work.

g. Prior to the preconstruction meeting for the project, the following Grading and or Improvement Plan Notes shall be placed on the Preliminary Grading Plan and made conditions of the issuance of said permits:

   In the event that any activity, including earthmoving or construction, discovers the presence of contaminated soils on-site, the contractor and/or property owner shall notify County PDS and DEH. The presence of contaminated soils will require soil testing and remediation in accordance with standard County procedures. This process will be determined once the County is notified of the presence of contaminated soils.

HAZ-2 Prior to the preconstruction meeting for the project, the two existing drums on-site, formerly containing groundwater with petroleum products, shall be evaluated by a California Licensed Environmental Consultant and properly disposed, in accordance with state and local requirements.

X. HYDROLOGY AND WATER QUALITY.

a) Would the project violate any water quality standards *or* waste discharge requirements or otherwise substantially degrade surface or ground water quality?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The following technical studies have been prepared for the project:

- PDP SWQMP prepared by Kimley-Horn and Associates, Inc., dated April 2, 2024 (Appendix F).
- Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G).

The following responses have incorporated the analyses from these studies.

Less Than Significant Impact: Potential sources of water pollution would include construction phase disturbance of the soils through grading, materials delivery, and waste generation, and post-construction residential development, including impervious surfaces, landscaped areas (fertilizers/pesticides), pet waste, trash storage, and motor vehicles. However, as described in the PDP SWQMP for the proposed project prepared by Kimley-Horn and Associates, Inc., dated April 2, 2024 (Appendix F), the project is required to obtain a waste discharge identification number and a NPDES General Construction Permit for stormwater discharges from the State Water Resources Control Board (Region 9). The General Construction Permit for requires preparation and implementation of a SWPPP and associated BMPs. As noted in the PDP SWQMP for the proposed project, construction BMPs would include hydraulic stabilization hydroseeding in the summer, an erosion control blanket in the winter, energy dissipator outlet protection, silt fencing, gravel and sand bags, storm drain inlet protection, an engineered desilting basin (sized for a 10-year flow), a stabilized construction entrance, construction road stabilization, an entrance/exit inspection and cleaning facility with a tire wash, street sweeping and vacuuming, materials management, and waste management.

The project would be consistent with requirements of the County of San Diego BMP Design Manual, which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer System (MS4) Permit (Regional Water Quality Control Board [RWQCB], San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) requirements for stormwater management.

Additionally, the PDP SWQMP prepared for the project includes several long-term operational BMPs that would prevent degradation of surface or groundwater quality, including site design (landscaping and maintenance of common area and slopes with native or drought-tolerant species, dedication of open space outside of the development footprint), source control (storm drain stenciling/signage, protect trash storage areas, and others), directing runoff to pervious areas, and structural controls including biofiltration basins.

Given that the project would incrementally increase the area of impervious surfaces onsite, and includes construction and long-term operational BMPs, the project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project lies in the El Cajon Hydrologic Sub Area of the Lower San Diego Hydrologic Area of the San Diego Hydrologic Unit (907.13). The nearest impaired waterbody as listed on the Clean Water Act Section 303(d) list is Forester Creek approximately 1.15 miles south and 1.5 miles west of the project site. According to the Clean Water Act Section 303(d) list, the Forester Creek in hydrologic subarea 907.14 is impaired for benthic community effects, chloride, indicator bacteria, nitrogen, dissolved oxygen, phosphorus, selenium, total dissolved solids, and turbidity. Lake Jennings, Los Coches Creek, and the San Diego River (Lower) are also near the project site approximately 4.15 miles northeast, 2.5 miles north/northeast, and 2 miles north of the project site, respectively. According to the Hydrology and Hydraulics Report prepared for the project by H Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), drainage from the project site is tributary to a public storm drain system that discharges to the San Diego River. Specifically, the property drains primarily by overland flow to
two existing curb inlets located near the northeast corner of the site and northwest of the site along East Bradley Avenue.

The PDP SWQMP prepared for the project includes design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels during construction (e.g., hydraulic stabilization hydroseeding in the summer, an erosion control blanket in the winter, energy dissipator outlet protection, silt fencing, gravel and sand bags, storm drain inlet protection, an engineered desilting basin [sized for a 10-year flow], a stabilized construction entrance, construction road stabilization, an entrance/exit inspection and cleaning facility with a tire wash, street sweeping and vacuuming, materials management, and waste management). As part of this project, associated improvements would include three bio-filtration basins. Once of these would be used only for pollution control and flow control, while the other two would be used for pollution control and hydromodification control. The BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100; County Watershed Protection Ordinance (WPO; Sections 67.801 et seq.); County Stormwater Management, and Discharge Control Ordinance; and County Stormwater Standards Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that would reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water

as a resource; and to ensure the County is compliant with applicable state and federal laws. The WPO has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Each project subject to WPO is required to prepare a Stormwater Management Plan that details a project's pollutant discharge contribution to a given watershed and propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a). The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d).

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the El Cajon Hydrologic Sub Area of the Lower San Diego Hydrologic Area of the San Diego Hydrologic Unit (907.13) that has the following existing beneficial uses for groundwater: municipal and domestic supply, industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, and wildlife habitat (State Water Resources Control Board 2021).

Potential sources of polluted runoff resulting from the project are discussed in the PDP SWQMP prepared for the project. As described in Section X(a) and (b) above, a number of construction and operational BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.

d) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would obtain its water supply from the Helix Water District that obtains water from surface reservoirs or other imported water source. Limited water would be required during the construction phase for dust control and suppression and the project would not use any groundwater during construction or operation phases of the project.

In addition, the project would result in an incremental increase in impervious surfaces, which would not interfere with regional groundwater recharge, and would include landscaping bordering the paved surfaces which would allow for infiltration. The project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25-mile). Therefore, impacts would be less than significant.

e) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project proposes to create new impervious surfaces on the project site. As part of this project, associated improvements would include three bio-filtration basins. Once of these would be used only for pollution control and flow control, while the other two would be used for pollution control and hydromodification control. First flush runoff from the site would be treated in the biofiltration basins and piped via a proposed 18-inch storm drain to the existing 66-inch pipe along East Bradley Avenue to prevent scouring and erosion.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b). Several of these BMPs are intended to reduce erosion and siltation to the maximum extent feasible. In addition, as shown in Table 1 of the Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), the 100-year peak flow from the project site would be reduced following development of the site. Drainage patterns and basin areas would not be substantially altered by the project as shown in Table 1 of the Drainage Study. Therefore, the project would not result in substantial erosion or siltation on- or offsite.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Please refer to Section X(e)(i). The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff. As shown in Table 1 of the Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), the 100-year peak flow from the project site would be reduced following development of the site, and drainage patterns and basin areas would not be substantially altered. Therefore, the project would have a less than significant impact with respect to increasing the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b) and would have a less than significant impact with regard to substantial additional sources of polluted runoff. As described in Section X(e)(i) above, the project would not significantly alter established drainage patterns and would actually reduce the amount of runoff from the project site (Appendix G). Therefore, the project would have a less than significant impact with respect to creating or contributing runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

(iv) impede or redirect flood flows?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant: Please see Section X(e)(i) through (iii). The Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G) demonstrates that the Project would not impede or redirect flood flows.

f) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The proposed site lies within a Flood Zone “X’ as designated by FEMA, which defines the area determined to be outside the 500-year flood and protected by levee from 100-year flood. Therefore, the project site is not located in a flood hazard zone. Additionally, the

project site is located outside of a tsunami or seiche zone given its distance from a lake or the coast. Therefore, no impact would occur.

g) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See Section X(a) through (d). The project would implement construction and operational BMPs established in the PDP SWQMP prepared for the project to protect water quality. As a result, the project would not contribute to a direct or cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. As described in Section X(d) above, the project would not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. The project would be required to implement the PDP SWQMP, prepare and implement a SWPPP, and be in compliance with the County's WPO. Therefore, the project would have a less than significant impact with regard to implementation of the Basin Plan or a sustainable groundwater management plan.

XI. LAND USE AND PLANNING.

a) Would the project physically divide an established community?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☒	No Impact

No Impact: The project proposes the development additional buildings on a currently developed site. No component of the project would introduce a barrier or division to, or otherwise result in a conflict with, the surrounding residential, commercial, or industrial development or other established community. Because the project site's expansion exists within existing project boundaries, the proposed project would not significantly disrupt or divide the established community.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building in the unincorporated community of Lakeside, which is consistent with the Village Residential (VR-24) and Residential – Urban (RU) land use and zoning designations for the project site. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

XII. MINERAL RESOURCES.

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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

Less Than Significant Impact: The project site is not classified by the California Department of Conservation – Division of Mines and Geology as an area of "Potential Mineral Resource Significance." The project site is surrounded by developed residential land uses which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Additionally, the project site is less than four acres in size. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

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

No Impact: The project site is not located in a Mineral Resource Zone, nor is it located within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project.

XIII. NOISE.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Noise Report was prepared for the project by Rincon Consultants dated September 17, 2024 (see Appendix H). The following responses have incorporated the analysis from the report.

Less Than Significant With Mitigation Incorporated: The project would include construction and operation of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building.

General Plan – Noise Element
The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 dBA for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is located in an area in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. Project implementation is not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL.

The Noise Report evaluated potential noise impacts to the existing and future noise sensitive land uses from the proposed development. Based on the Noise Report, the nearest noise source to the project site is vehicle traffic on East Bradley Avenue. Vehicle traffic along this roadway would generate future noise levels as high as 49 dBA CNEL, which would be below the 60 dBA CNEL exterior noise standard applicable to the project. This demonstrates conformance with the County Noise Element. Interior noise levels would range from 10 CNEL to 45 CNEL. These levels are below the County of San Diego's 45 CNEL standard for interior noise levels and impacts would be less than significant. Furthermore, vehicle traffic associated with the project would not cause an increase in noise levels of more than 3 dBA CNEL on any roadway segment and no cumulative noise increase of 3 dBA CNEL or more was found. Therefore, the proposed project's direct and cumulative contributions to offsite roadway noise increases would not cause significant impacts to any existing or future noise sensitive land uses. The project would introduce sources of operational noise to the area, including HVAC and PTAC units and a new emergency generator. Operational noise during the daytime (HVAC/PTAC units and generator) and nighttime (HVAC/PTAC units) would not exceed the applicable County noise standards at the property line. Additionally, the generator would be tested twice a month for 30 minutes at a time during the daytime. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404

The project is also subject to the County Noise Ordinance. Temporary construction noise is subject to Section 36.408, 409, and 410 of the Ordinance. Construction equipment operations are subject to a 75 dBA 8-hour average sound level limit at the boundary of an occupied residence. General construction equipment for grading and preparation of the site would be required. Construction equipment is anticipated to be comprised of a backhoe, hi-lift (a type of front-end loader), sheepsfoot roller, dozer, and trackhoe (similar to an excavator). Grading equipment would be spread out over the project site from adjacent to the occupied properties to distances of over 135 feet away. The report identified that if grading activities involving these five pieces of equipment operate within 137.5 feet of occupied residences, the 8-hour average of 75 dBA would be exceeded, which would be a significant impact. The equipment would operate as close as 25 feet to the occupied residential properties; at this distance, maximum construction noise levels would reach up to 88 dBA L_{max}, which would exceed the County's 82 dBA L_{max} noise threshold. The approximate distance in which construction noise levels would not exceed 82 dBA L_{max} would be 50 feet. Therefore, if construction occurs within 50 feet of the nearby residential properties, construction impacts would be potentially significant. To reduce potential noise impacts from construction equipment, the Noise Report includes construction mitigation. MM NOI-1 would implement temporary sound barriers/blankets between the construction area and adjacent noise-sensitive receivers and provide contact information for noise complaints, as well as noise monitoring if a complaint is issued. The project would be conditioned to install these construction noise reductions prior to commencing grading and construction activities. With implementation of sound barriers/blankets required by MM NOI-1, construction noise levels would be reduced by at least 10 dBA. Therefore, construction noise levels would reach up to approximately 78 dBA L_{max} with mitigation, which would not exceed the County's 82 dBA L_{max} construction noise threshold. Therefore, incorporation of MM NOI-1 would reduce noise levels to comply with the County Noise Ordinances and result in a less than significant impact.

Non-transportation operational noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. The site is zoned Urban-Residential (RU) that has a 1-hour average sound limit of 45 between 10 P.M and 7 A.M and 50 dB between 7 A.M and 10 P.M. The adjacent properties are zoned Mobile-Home Residential (RMH9), Urban-Residential (RU), and Variable-Family Residential (RV), which have the same 1-hour average sound limits. Based on review by staff and the County Noise Specialist, the project's operational noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is 45 dB, because the project operation would not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

The project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, with MM NOI-1, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project proposes a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the project site is located more than 200 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A distance of 200 feet ensures that the operations would not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc. 1995). This distance ensures that the project would not be affected by any past, present, or future projects that may support sources of groundborne vibration or groundborne noise.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which may be used within 25 feet of the nearest off-site sensitive receivers (multi-family residences) to the east when accounting for setbacks. A dozer would create approximately 0.089 in/sec peak particle velocity (PPV) at a distance of 25 feet (Caltrans 2020). This would equal a vibration level of approximately 87 vibration decibels (VdB) and 0.022 one inch per second (in/sec) root mean squared (RMS). Non-transportation vibration sources such as impact pile drivers or hydraulic breakers are significant when their PPV exceeds 0.1 in/sec. While this would exceed the County's groundborne vibration and noise standards established in the Guideline for Determining the Significance of Ground-Borne Vibration and Noise Impacts, those standards would only apply if construction was occurring at nighttime (as Category 2 is for uses where sleeping may be occurring), for Category 3 buildings where quiet study is required (e.g., classrooms and libraries) or for Category 1 buildings where laboratory uses are located. Construction is not occurring at nighttime, and therefore Category 2 limits would not apply; none of the Category 1 or 3 uses would be located near the project site, and therefore those limits would not apply. In addition, the vibration level of 0.089 in/sec PPV would be lower than Caltrans thresholds of a distinctly perceptible impact for humans at 0.24 in/sec PPV and the structural damage impact to residential structures at 0.2 in/sec PPV. Therefore, although a dozer may be perceptible to nearby human receivers, temporary impacts associated with the dozer (and other potential equipment) would be less than significant.

The project does not propose any major, new or expanded infrastructure such as mass transit, highways, or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area. There are no existing or proposed operational activities on or near the proposed project site at this time which would cause any significant vibration levels to existing buildings near the project site. Project impacts related to groundborne vibration or groundborne noise levels would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project is subject to the County Noise Element which requires proposed residential development not to be exposed to noise levels exceeding 60 dBA CNEL. Based on the Noise Report (Appendix H), the nearest noise source to the project site would be from vehicle traffic on East Bradley Avenue. Vehicle traffic along this roadway would generate future noise levels as high as 49 dBA CNEL outside of the proposed skilled nursing and assisted living units. This demonstrates conformance with the County Noise Element. Additionally, the project-related contributions to vehicle traffic on nearby roadways would not result in offsite direct/cumulative noise impacts. No further noise mitigation and or measures are required for Noise Element conformance.

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. Urban-Residential (RU) that has a 1-hour average sound limit of 45 between 10 P.M and 7 A.M and 50 dB between 7 A.M and 10 P.M. The adjacent properties are zoned Mobile-Home Residential (RMH9), Urban-Residential (RU), and Variable-Family Residential (RV), which have the same 1-hour average sound limits. Based on review by staff and the County Noise Specialist, the project's operational noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant With Mitigation Incorporated: Temporary and periodic increases in ambient noise from grading activities and construction of the project are addressed above in Section XIII(a). Potential impacts that would be mitigated to less than significant were identified for those activities. Once the project is constructed, the resulting skilled nursing and assisted living land uses would not result in substantial temporary or periodic increases in ambient noise as compared to adjacent residential land uses.

e) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

☐ Potentially Significant Impact
☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The closest airport to the project site is Gillespie Field, located approximately 0.8 mile to the northwest. The project site is not within the Gillespie Field noise contours and is approximately 0.3 mile south of the 60 CNEL contour (San Diego County Regional Airport Authority 2010). Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

Mitigation Measures

NOI-1 The project applicant shall reduce construction noise levels at the adjacent residential uses to the east, south, and west of the project site to a noise level not to exceed the County's 82 dBA Lmax construction noise threshold when construction equipment is operating within 50 feet of nearby residential properties to the east, south, or west. This shall be accomplished through the following required measures:

- Installation of temporary sound barriers/blankets along the eastern, western, and southern boundaries adjacent to the multi-family receivers. The temporary barriers/blankets shall have a minimum sound transmission loss of 21 and noise reduction coefficient of 0.75. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches.
- Provide a sign at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action if necessary in a timely manner. The sign will have a minimum dimension of 48 inches wide by 24 inches high. The sign will be placed 5 feet above ground level.
- If a noise complaint(s) is registered, the contractor will retain a County-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements will be conducted for a minimum of 1 hour and will include 1-minute intervals. The consultant will prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

The following measures may also be used to reduce noise levels:

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
- Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators) or located as far from sensitive receivers, as feasible.

XIV. POPULATION AND HOUSING.

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project proposes an expansion of the existing Bradley Court Convalescent Center with a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds and a total of 153 beds at the Bradley Court Convalescent Center. The anticipated residents would be located within the region and would not increase population growth. The proposed expansion is consistent with the existing land use and zoning designations for the site. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The proposed project would not demolish the existing structures onsite. Therefore, the project would not displace existing people or housing, and impacts would be less than significant.

XV. PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

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

☐ Potentially Significant Impact
☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds and a total of 153 beds at the Bradley Court Convalescent Center. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The project is located immediately adjacent to San Miguel Fire Protection District Station 19. The San Diego County Sheriff's Department provides police protection to the Project site from the Lakeside Substation, which serves the communities of Lakeside and unincorporated El Cajon, California. The 66 assisted living beds and 31 skilled nursing beds would not result in increased demand for existing neighborhood and regional parks or other recreational facilities. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Therefore, the project would not result in the need for new or physically altered governmental facilities, the construction of which would cause a significant impact on the environment. Impacts would be less than significant.

XVI. RECREATION.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building in the unincorporated community of Lakeside. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The 66 assisted living beds and 31 skilled nursing beds would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur from the project.

XVII. TRANSPORTATION.

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds for transportation using VMT. The TSG also establish measures of effectiveness for the performance of the circulation system by incorporating standards from the County of San Diego Public Road Standards and 2011 General Plan Mobility Element.

A Transportation Analysis was prepared for the project by Linscott, Law & Greenspan Engineers dated November 8, 2022 (see Appendix I). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The Transportation Analysis identified that the proposed Project would generate 263 new daily trips. However, the project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the County's TSG. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. The El Cajon Transit Center is located approximately 3 miles from the project site, on the southwest corner of the Main Street/Marshall Avenue intersection. There are multiple bus stops along East Bradley Avenue. These stops are served by MTS bus route 833 which runs from the Santee Town Center to the El Cajon Transit Center. MTS bus route 833 runs along Mission Gorge Road, Magnolia Avenue, Graves Avenue, Pepper Drive, Mollison Avenue, Fletcher Pkwy and Arnele Avenue. Weekday service begins at 5:44 AM with 1-hour headways throughout the day and ends at 6:25 PM. Saturday and Sunday service begins at 8:51 AM with 1-hour headways throughout the day and ends at 5:41 PM. The project would take advantage of its proximity to these bus stops, and would not result in a conflict with transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system and no mitigation is required.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds and screening criteria for transportation VMT.

Less Than Significant Impact: The Transportation Analysis utilized the County of San Diego Transportation Study Guidelines (TSG) approved by the Board of Supervisors in September of 2022 (incorporated herein by reference). The TSG provides criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The TSG establishes the contents and procedures for preparing a Transportation Impact Analysis in the County of San Diego. The TSG was updated in 2022 to address legislative changes in SB 743, which changed the basis for evaluating transportation impacts in CEQA from the Level of Service (LOS) metric to the VMT metric. As noted in the TSG, "The legislative intent of SB 743 was to 'more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.'" To that end, the County performed a qualitative and quantitative analysis (found in Appendix D of the TSG) to determine the appropriate "infill" areas that support SB 743 goals. Qualitative measures included an analysis of the definition of "infill" used in State law, the Federal Census, and scholarly literature. Quantitative information included the use of population density; housing density; employment density; intersection density; access to jobs within a 15-mile radius; and access to shopping/restaurant uses within a 1-mile radius. The qualitative and quantitative information was applied to the County through GIS to create geographic maps of the County meeting the "infill" criteria.

The Transportation Analysis identified that the proposed project is located within an adopted Infill Area and would meet the proposed VMT screening criteria as the project is located in a Transit Opportunity Areas (TOA) and is not located in a High/Very High FHSZ. The TSG states that projects located within Infill Areas are screened from further VMT analysis and are considered to have a less than significant impact for transportation, because they meet the qualitative and quantitative criteria in the TSG to determine that they are located in a VMT-efficient area and meet the policy goals of SB 743. Development within Infill Areas meets the legislative intent of SB 743, which established VMT as the metric to evaluate transportation for CEQA because promoting development within the County's denser village areas create a greater diversity of land uses that would encourage transit and lower average VMT over time. Therefore, the project would result in a less than significant impact related to VMT, and no mitigation is required.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The proposed project would not significantly alter roadway geometry on East Bradley Avenue. The project site currently takes access from East Bradley Avenue, a County maintained road, via a single full access driveway on the west side of the project site. This driveway is proposed to be relocated eastward to be more centered to the

project site. In order to determine if vehicles turning left into the project site would cause a queue resulting in potential congestion and backups along Bradley Avenue in the westbound direction, the Transportation Analysis included a queuing analysis at the project's driveway. The Transportation Analysis determined that even with the provided on-street parking, vehicles traveling in the westbound direction should be able to maneuver around the project's inbound trips. Therefore, access to the project driveway would function adequately. A safe and adequate sight distance shall be required at the proposed realigned driveway to the satisfaction of the Director of the Department of Public Works. The driveway improvements would be constructed according to the County of San Diego Public and Private Road Standards. The proposed project would not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project would not significantly increase hazards due to design features or incompatible uses.

d) Would the project result in inadequate emergency access?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant: The project would not generate traffic volumes that would impede emergency access. The proposed plans are required to comply with the County's emergency access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. Additionally, San Miguel Fire Protection District Station 19 is located immediately east of the project site. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: As previously described, a Cultural Resources Technical Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted.

Less Than Significant Impact: Rincon Consultants contacted the Native American Heritage Commission on April 19, 2021, to request a Sacred Lands File search of the project site. As part of this request, Rincon asked the Native American Heritage Commission to provide a list of Native American groups and/or individuals culturally affiliated with the area who may have knowledge of cultural resources within the project site. The Native American Heritage Commission responded on May 19, 2021, stating the results of the Sacred Lands File search were positive. The Native American Heritage Commission recommended contacting the Baron Group of the Captain Grande, the Viejas Band of Kumeyaay Indians, and the Kumeyaay Cultural Repatriation Committee. On May 20, 2021, Rincon attempted to contact Mr. Clint Linton to discuss the project but a specific response regarding the project was not received.

Ms. Lisa Cumper, Tribal Historic Preservation Officer for the Jamul Indian Village was contacted to provide tribal monitoring for the project. Erica Gonzalez provided tribal monitoring during the pedestrian survey.

Pursuant to AB 52, consultation was initiated with culturally affiliated tribes. The County contacted Barona Band of Mission Indians, Campo Band of Kumeyaay Indians, Jamul Indian Village, Kwaaymii, Manzanita Band of the Kumeyaay Nation, San Pasqual Band of Mission Indians, Iipay Nation of Santa Ysabel, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians via email on April 18, 2024. Barona, Campo, San Pasqual, and Viejas requested consultation and were provided the Cultural Resources Technical Report with negative findings. All consulting Tribes requested concurrence for San Pasqual to be identified as the Native American tribal monitor for the pedestrian field survey conducted as part of the Cultural Resources Technical Report prepared for the project. Consultation with Barona concluded on August 21, 2024 and has concluded with Viejas due to no response. Consultation with the remaining two tribes (i.e., Campo and San Pasqual) is ongoing. No tribal cultural resources have been identified during consultation. As such, impacts to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS.

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building. The project is served by Helix Water District and no new or expanded water or wastewater facilities are required for the project. As outlined in this this Initial Study, the project would not result in an adverse physical effect on the environment because all related impacts from the proposed development have been mitigated to a level below significance. Refer to Section IV. Biological Resources, Section V. Cultural Resources, Section IX. Hazards and Hazardous Materials, and Section XIII. Noise for more information.

Therefore, because the project would not require the construction of new or expanded facilities that could cause significant environmental effects, less than significant impacts would occur.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is served by Helix Water District. Minimal water would be required during project construction for dust control and suppression. The project is consistent with existing land use and zoning designations for the site; therefore, the urban residential use type is integrated into Helix Water District's current and future water projections. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building in the unincorporated community of Lakeside. As such, wastewater from the project site is conveyed via a network of collector pipes, trunk lines, and pump stations to the City of San Diego's Point Loma Wastewater Treatment Plant for wastewater treatment. The Point Loma Wastewater Treatment Plant currently has wastewater treatment capacity of 240 million gallons per day (gpd) and currently only treats 175 million gpd (City of San Diego 2023). Therefore, the Point Loma Wastewater Treatment Plant has capacity to serve the project, and the project would not interfere with any wastewater treatment providers service capacity. Impacts would be less than significant.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, which would result in long-term operational solid waste generation. There are five, permitted active landfills in San Diego County with remaining capacity, including Borrego Landfill (111,504 cubic yards [cy] remaining capacity), Otay Landfill (21,194,008 cy remaining capacity), West Miramar Sanitary Landfill (11,080,871 cy remaining capacity), Sycamore Landfill (113,972,637 cy remaining capacity), San Onofre Landfill (1,057,605 cy remaining capacity), and Las Pulgas Landfill (9,503,985 cy remaining capacity). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals, and impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, which would result in long-term operational solid waste generation. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency, issues solid waste facility permits with concurrence from CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The County requires recycling of 90 percent of inerts and 70 percent of all other materials from construction projects, per County Ordinance Section 68.508 through 68.518 (Diversion of Construction and Demolition Materials from Landfill Disposal). The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan prior to the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements (refer to Section VIII. Greenhouse Gas Emissions). The project would deposit all solid waste at a permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The project site is not located within a high or very high FHSZ; therefore, the project is not required to prepare a Fire Protection Plan.

Less Than Significant Impact: The project would be served by the San Miguel Fire Protection District Station 19, immediately east of the project site. As described in Section IX(e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The project would include construction and operation of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building, with no growth-inducing project components since the anticipated residents would be located within the region and would not increase population growth. Therefore, no substantial demand beyond current conditions is required for emergency response. Project access would be from a driveway along Bradley Avenue. Project access would comply with County road standards (e.g., road and street grade below 20 percent, paved streets with capacity to support up to 75,000 pounds, etc.). Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is within a local responsibility area and is not within an identified FHSZ. Given that the majority of the County is in the high and very high FHSZ, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. Homes near the project site and their compliance with fuel modification requirements lower the fire threat and risk to the proposed project.

The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. To ensure the project does not exacerbate wildfire risks, the project would be required to include non-combustible roofing and non-combustible or standard fire-resistive building materials, per the San Miguel Fire Protection District requirements. Therefore, the project would not expose project occupants, such as employees or residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, San Miguel

Fire Protection District Station 19 is located immediately east of the project site. Impacts would be less than significant.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would include development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building and does not propose any structures or additional infrastructure that would exacerbate fire risk. Development and operation of the proposed project would be required to comply with the County Fire Code and Consolidated Fire Code, and compliance with the San Miguel Fire Protection District's requirements. Therefore, based on project coordination with County staff and compliance with the County's and San Miguel Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

d) Would the project expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would include development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, including associated grading and paving activities on-site. As described in Section X, Hydrology, the project site is not currently prone to flooding; therefore, the project site would not be prone to onsite flooding following construction of the project. In addition, contaminated soils would be removed from the project site (refer to Section IX, Hazards and Hazardous Materials), and project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Due to the aforementioned factors, the project site would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts are less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The potential of the Project to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in Section IV and Section V of this Initial Study. In addition to project-specific impacts, this evaluation considered the project's potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project. However, mitigation has been included that clearly reduces these effects to a level below significance. Please see Section IV, Section V, and Section IX, and Section XIII above. This mitigation includes nesting bird surveys, cultural monitoring and reporting, soil remediation, and temporary sound barriers during construction**.** As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT/MAP NUMBER	DETAILS
Lake Jennings Marketplace	TM 5590	Commercial Development, 6 buildings totaling 76,100 sq. ft., 10,992 ADT, Road and I-8 ramp/Lake Jennings Park Road improvements required, Cultural Resource

		monitoring, offsite mitigation for impacts to Coast live oak woodland and non-native grassland, onsite open space for wetlands, mitigation for construction phase noise.
Riker Ranch	TM 5592	Subdivide 6.24 acres into 21 single-family residential lots, 230 ADT, no direct traffic impacts, cumulative traffic impacts addressed by TIF payment, bio impacts - 1.4 acres non-native grassland mitigated at 0.5:1, impacts to cultural and historical resources mitigated through documentation including mapping, construction monitoring for subsurface resources, implement FPP requirements to address fire protection, implement SWMP to address potential for construction and post-construction phase pollutants .
El Monte Sand Mine	MUP-99-014W2	Sand mining for 12.5 million tons over 12 years plus 4 additional years to finish reclamation/revegetation, significant and unavoidable aesthetic, land use, and mineral resources impacts, impacts to 0.12 acres riparian habitat, 3.6 acres coastal sage scrub, 41.8 acres tamarisk scrub, 0.36 acres non-vegetated channel, and 86.6 acres non-native grassland are mitigated to less than significant, impacts to cultural resources mitigated to less than significant with open space and monitoring for unknown subsurface resources, impacts to paleontological resources mitigated to less than significant with monitoring for potential subsurface resources, noise impacts mitigated to less than significant through buffering distance, noise berms, limit operational hours, no queuing of trucks at project entrance, traffic impacts mitigated to less than significant with road/intersection improvements
Fanita Ranch	City of Santee project – GPA2017-2, AEIS2017-11	2,300+ acre project site, ~3,000 residential units, 80,000 sq. ft. commercial, 1,650 acres open space, impacts mitigated to less than significant with mitigation include air quality, biological resources (975 acres critical habitat for California gnatcatcher, 967 acres critical habitat for Hermes copper butterfly, Engelmann and Coast live

		oak trees, several other species and habitats), cultural resources (habitation site, artifacts), geology/soils, paleontological resources, greenhouse gas emissions, noise, and tribal cultural resources. Impacts that remain unavoidable with incorporation of mitigation include air quality, noise, and transportation/traffic (including VMT).

The potential for adverse cumulative effects were considered in Sections I through XX of Initial Study. In addition to project-specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, and in consideration of all mitigation required by the project, there were determined to be no potentially significant cumulative effects the project would have a considerable contribution to. Mitigation has been included for project impacts that clearly reduces any potential for a considerable contribution to any cumulative effects to a level below significance. Please refer to Section IV. *Biological Resources*, Section V. *Cultural Resources*, Section IX. *Hazards and Hazardous Materials*, and Section XIII. *Noise* above. This mitigation includes but is not limited to nesting bird surveys, cultural monitoring and reporting, soil remediation, and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, the project would have any considerable contribution to a cumulative impact. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in Section I. *Aesthetics*, Section III. *Air Quality*, Section VII. *Geology and Soils*, Section IX. *Hazards and Hazardous Materials*, Section X. *Hydrology and Water Quality*, Section XIII. *Noise*, Section XIV. *Population and Housing*, and Section XVII. *Transportation*. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to potential hazardous materials and noise impacts. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes soil remediation and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to http://www4.law.cornell.edu/uscode/. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

Appendix A – Air Quality Report

Appendix B – Biological Resources Letter Report

Appendix C – Cultural Resources Technical Report

Appendix D – Greenhouse Gas Memorandum

Appendix E – Phase I Environmental Site Assessment

Appendix F – Priority Development Project Storm Water Quality Management Plan

Appendix G – Preliminary Drainage Report

Appendix H – Noise Report

Appendix I – Transportation Analysis

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