County of San Diego

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

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

   Freedom Ranch Alcohol and Drug Treatment and Recovery Facility; PDS2012-3301 74-011-07 (MUP); PDS2012-3910-1221002 (ER)

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

3. a. Contact Robert Hingtgen, Project Manager
   b. Phone number: (858) 694-3712
   c. E-mail: Robert.Hingtgen@sdcounty.ca.gov.

4. Project location:

   The project site is located at 1765, 1777, and 1813 Buckman Springs Road in the unincorporated community of Campo, California within the Campo/Lake Morena Community Plan Area.

   Thomas Guide Coordinates: Page 1317, Grid H2/J2

5. Project Applicant name and address:

   Owner: San Diego Freedom Ranch, Inc.
   P.O. Box 157, Campo, CA 91906

   Contact: Laurie Price, 518 Rosecrans Street, San Diego, CA 92106

6. General Plan

Community Plan:	Mountain Empire Subregional Plan
Land Use Designation:	Semi-Rural 10 (SR-10) and Rural Lands 20 (RL-20)
Density:	1 du/10 acre(s) and 1 du/20 acres

7. Zoning

Use Regulation:	S92 (General Rural)
Minimum Lot Size:	4 acres
Special Area Regulation:	-

8. Description of project: The project is a proposed expansion of the Freedom Ranch Alcohol and Drug Treatment and Recovery Facility that requires a modification of the facility's existing Major Use Permit (MUP). The facility will increase the number of beds available to clients from 50 to 125 including up to 25 beds for in a transitional living dormitory. The MUP area would expand from four to 112.6 acres on adjacent land owned by Freedom Ranch and incorporate an existing five-bed transitional living trailer while removing an existing six-bed residential building. The proposed expansion would occur in four phases as follows:

Phase 1: The exterior mud room (64 square feet) of the Main Building (Structure 1, 5926 square feet) would be removed; the Multipurpose Room (Structure 2, 1,800 square feet) would have the ADA access relocated; A storage room (Structure 3, ~~386~~368 square feet) would be removed; A walk-in cooler (Structure 5, 304 square feet) would be removed; A dry storage room (Structure 6, 510 square feet) would be removed; An abandoned pig shed (Structure 10, 528 square feet) would be removed; A new dining hall (Structure 23, 5,712 square feet) and new dormitory (Structure 24, 4,144 square feet) would be constructed along with a new access road/driveway and parking lot that would provide 35 new parking spaces (approximately 11 parking spaces are existing). The area of structures would increase by ~~8,064~~8,082 square feet in Phase 1; however, there would be no increase in clients as 25 existing beds in the Main Building would be moved to the new dormitory (Structure 24) once it is constructed.

Phase 2: The Main Building would be further remodeled by converting the dining room to a reception area, and a new dormitory (Structure 25, 4,144 square feet would be constructed. The area of structures would increase by 4,144 square feet in Phase 2; however, there would be no increase in clients as 25 remaining client beds in the Main Building would be moved to the new dormitory (Structure 25) once it is constructed.

Phase 3: The remainder of the Main Building would be converted to administration, board meeting room, staff quarters and storage space; two new dormitories (Structures 26 and 27, each 4,144 square feet) would be constructed. The area of structures would increase by 8,288 square feet in Phase 3. The population of the facility would expand by an additional 50 clients and three staff (estimated) after construction of Phase 3.

Phase 4: A cottage (Structure 15, 140 square feet) would be removed; Staff quarters (Structure 11, 320 square feet) would be removed; Transitional living (Structure 14, 690 square feet) would be removed and transitional living clients would be relocated

temporarily to the remodeled Main Facility; A garage (Structure 17, 576 square feet) would be removed; The existing six-bed residential structure (Structure 18, 1,192 square feet) would be removed; A new transitional living dormitory (Structure 28, 4,144 square feet) would be constructed; and, a new garage (Structure 29, 576 square feet) would be constructed The overall area of structures would increase by 1,802 square feet in Phase 4. For Phases 1 through 4, the overall area of structures would increase by ~~22,298~~22,316 square feet over the existing conditions.

The number of paid staff is anticipated to increase from five to ~~eight~~ten, client beds will increase from 50 to 100, and transitional living beds will increase from five to 12-25. The existing residential structure with 6 beds will be removed. Overall number of staff, clients, and transitional living clients on site will remain at 66 through Phase 2, and increase to 119 in Phase 3, and to between 120 and 133 in Phase 4.

The project site is groundwater dependent and utilizes onsite wastewater treatment systems (septic tanks and leach fields). New dormitories (Structures 26 and 27) that will be constructed in Phase 3 will require septic tank pumps and force mains to transport wastewater approximately 1,800 feet north to new horizontal pits. Wastewater from the new dormitory that will be constructed in Phase 2 (Structure 25) will initially flow to a nearby new leach field; however, the wastewater from this dormitory may need to be transported approximately 1,600 feet north to a new horizontal pit leach field in Phase 3 or Phase 4, which will be determined by Department of Environmental Health staff.

The new dormitory structures will be 22 feet in height and the new dining hall will be just over 24 ½ feet in height. These new structures will be one-story with composition shingle roofs, stucco walls, and stained wood doors, windows, and exposed framing on porches and railings. The facility will implement a landscape plan that will soften the views of the new structures and place new screening landscaping along property lines south of the existing Main Building and north of the existing residential building (or proposed Phase 4 area).

A total grading amount of 15,000 cubic yards is proposed. Phase 1 will require 14,800 cubic yards of cut and fill, with a maximum cut slope height of 19 feet and an a maximum fill slope height of 13 feet. Only 200 cubic yards of grading is anticipated for Phase 4.

Visiting hours will continue as presently scheduled, which is daily from 2 to 9 P.M.

Alcoholics Anonymous (AA) meetings will continue as presently scheduled, which is Monday through Friday from 8 to 9 P.M., Saturday at 4 P.M., and Sunday at 3 P.M. Narcotics Anonymous (NA) meetings will continue as presently scheduled, which is Monday, Wednesday and Friday from 6 to 7 P.M. AA and NA meetings are open to the public.

Three fund raiser events occur during the year, in April, July and October. These events currently draw 150 people to the facility. With the proposed expansion, these events are expected to attract 300 people.

Current average daily trips (ADT) generated by the facility is 47 and will increase by 49 additional ADT with the proposed expansion.

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

Land uses surrounding the project site are rural and contain residential, animal keeping, and avocational agricultural uses. Much area is also undeveloped. The Sunrise Powerlink crosses Buckman Springs Road about 2000 feet north of the proposed expansion area, but still on property owned by Freedom Ranch that is proposed to be part of the expanded MUP area. Cameron Corners at SR-94 lies 1.6 miles to the southeast along Buckman Springs Road, and the community of Campo lies another mile south of that. The topography of the project site and adjacent land is rugged. The site lies at approximately 2800 feet elevation along Buckman Springs Road and contains a seasonal drainage that flows north to south. Elevation increases to the east towards a north/south trending ridge that lies approximately 250 feet higher in elevation. Another north/south trending ridge lies to the west of Buckman Springs Road that is approximately 400 feet higher in elevation.

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

Permit Type/Action	**Agency**
Landscape Plans	County of San Diego
Major Use Permit Modification	County of San Diego
County Right-of-Way Permits Construction Permit Excavation Permit Encroachment Permit	County of San Diego
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
Septic Tank Permit	County of San Diego
General Construction Storm water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Fire District Approval	County Fire Authority

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 Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology & Soils
☐ Greenhouse Gas Emissions	☒ Hazards & Haz. Materials	☐ Hydrology & Water Quality
☐ Land Use & Planning	☐ Mineral Resources	☐ Noise
☐ Population & Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities & Service Systems	☒ 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, Planning & Development Services 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, Planning & Development Services 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, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

	March 13, 2015
Signature	Date
Robert Hingtgen	Land Use/Environmental Planner
Printed Name	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 on-site, 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 -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

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

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: Based on a site visit completed by County staff on April 24, 2012, the proposed project is located near or within the viewshed of a scenic vista. The viewshed and visible components of the landscape within that viewshed, including the underlying landform and overlaying land cover, establish the visual environment for the scenic vista. The visual environment of the subject scenic vista extends between the two north/south trending ridges east and west of the project site. The visual composition consists of fairly sparse residential and agricultural (including viticulture and the raising of animals) land uses in the valley that trends north to south and parallel to Buckman Springs Road. The hillsides above the valley floor are mainly undeveloped and contain Southern Mixed Chaparral habitat. Large oak trees are located mainly along the floor of the valley through the site, including the already developed portion of the site. The Sunrise Powerlink electric transmission line traverses the valley from east to west approximately 2000 feet north of the proposed expansion area. .

The proposed project will construct four new dormitories each 22 feet in height, one dining hall 24.5 feet height, and two parking lots containing 35 parking spaces on an approximately 6-acre area. This area proposed for expansion by the project lies approximately 1000 feet east of Buckman Springs Road and 40 to 90 feet higher in elevation. A 24-foot wide driveway will lead to the expansion area. Although this area will need to cleared for the proposed expansion, the project will have minimal grading for this area. A total of 15,000 cubic yards of grading is proposed. Maximum height of cut and fill is 19 feet and 13 feet, respectively. However, these would occur in very limited areas. The cut slope would occur east (behind) the proposed dining hall, and more common heights of fill slopes for the building pads for the dormitories is between five and eleven feet. In addition, the proposed expansion area is not very visible from Buckman Springs Road due to the tall and rather dense oak trees that exists along the seasonal drainage that is parallel to and on the east side of the road. The proposed buildings will be constructed with composition shingle roofs, wood framing and windows, stucco walls, and covered patios with wooden columns and railings that will be compatible with existing

residential development in the area. A Landscape Plan will be implemented that will further soften any views of the new structures. A fifth new dormitory that will be constructed in Phase 4 will be located approximately 140 feet from Buckman Springs Road and will require only 200 cubic yards of grading with no significant cut or fill slopes. This new structure will replace an existing residential structure located among existing oak trees and will be further screened by an existing orchard and additional landscaping that will be placed along Buckman Springs Road through implementation of the required Landscape Plan. Therefore, the proposed project will not have a substantial adverse effect on a scenic vista.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the scenic vista's viewshed, however the project will not contribute to any cumulative impact because the project will reflect the existing pattern of rural development and will be screened from views by existing vegetation and additional landscape plantings. Views of the project expansion area are well screened and fleeting from Buckman Springs Road and the southern portion of Lake Morena Drive. Any views of the proposed expansion area would not be concurrent with views of the proposed Star Ranch development, Cameron Solar project, or Campo Health Center. The proposed development portion of Star Ranch development is located just less than one mile to the south and at least 80 feet lower in elevation than the project site. The Cameron Solar project is located approximately one mile to the west and is separated from the project site by a ridge approximately 40 feet higher in elevation than the Freedom Ranch expansion area. The Campo Health Center is located approximately 1.5 miles to the south and 200 feet lower in elevation than the project site. Therefore, the project will not result in adverse project or cumulative impacts on a scenic vista.

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

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

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 proposed project is located near the viewshed of Lake Morena Drive and Buckman Springs Road south of Lake Morena Drive, which are both roadways in the County Scenic Highway System. These roadways lie over 1700 feet southwest of the proposed main expansion area. The site is not visible from that portion of Buckman Springs Road due to existing vegetation including large oak trees. There may be

fleeting views of the project site from Lake Morena Drive for a distance of 0.5 miles west of the intersection with Buckman Springs Road, between gaps in existing vegetation including large oak trees. Furthermore, the project site is not in the motorist's line of vision from Lake Morena Drive. A motorist would need to look 90 degrees to their left or right to see the project site from this roadway. After a distance of 0.5 miles from Buckman Springs road, Lake Morena Drive curves north behind a ridge which blocks any view of the project site area:

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Views of the project expansion area are well screened and fleeting from those portions of Lake Morena Drive and Buckman Springs Road that are part of the County Scenic Highway System. Any views of the proposed expansion area from these roadways are also quite distant (over 1700 feet) and would not be concurrent with views of the proposed Star Ranch development, Cameron Solar project, or Campo Health Center. The proposed development portion of Star Ranch is located just less than one mile to the south and at least 80 feet lower in elevation from the project site. The Cameron Solar project is located approximately one mile to the west and is separated from the project site by a ridge approximately 40 feet higher in elevation than the Freedom Ranch expansion area. The Campo Health Center is located approximately 1.5 miles to the south and 200 feet lower in elevation than the project site. Therefore, the project will not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

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

Less Than Significant Impact: 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. The existing visual character and quality of the project site and surrounding can be characterized as rural with residential, animal keeping, and avocational agricultural uses. The Sunrise Powerlink electrical transmission line also comes within 2000 feet of the proposed expansion area.

Although the project will develop a portion of the west-facing slope east of Buckman Springs Road, it is small in comparison to the overall west-facing slope of this ridge, and is not very visible from Buckman Springs Road due to intervening vegetation. The proposed buildings will be constructed with composition shingle roofs, wood framing and windows, stucco walls, and covered patios with wooden columns and railings that will be compatible with existing residential development in the area. A Landscape Plan will also be implemented that will further soften any views of the new structures. .

The project will not result in cumulative impacts on visual character or quality because the entire existing viewshed and a list of past, present and future projects within that viewshed were evaluated. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. The project will not contribute to any cumulative impact because the project will reflect the existing pattern of rural development and will be screened from views by existing vegetation and additional landscape plantings. Therefore, the project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

d) 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 proposed project will use outdoor lighting and is located within Zone A as identified by the San Diego County Light Pollution Code. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 51.201-51.209), including the Zone A lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1. The project will not install outdoor lighting that directly illuminates neighboring properties.
2. The project will not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project will not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project will not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that will be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project will not contribute to significant cumulative impacts on day or nighttime views because the project will conform to the Light Pollution Code. The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building

permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

In addition, the project's outdoor lighting is controlled through the Major Use Permit, which further limits outdoor lighting to that shown or stated on the approved Plot Plan. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensures that the project will not create a significant new source of substantial light or glare.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

a) 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 will be converted to a non-agricultural use.

b) 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 zoned S92, which is not considered to be an agricultural zone. Additionally, the project site's 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) 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
☐ Less than Significant Impact
☒ No Impact

Incorporated

No Impact: The project site including offsite improvements do not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, a rezone of the property 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) Result in the loss of forest land , conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

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

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

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

☐ 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 1 mile contains a small area of Farmland of Statewide Importance over ½ mile to the west-southwest and a parcel that is currently being used for viticulture approximately 1800 feet north of the proposed expansion area. There are no other 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, or known active agricultural operations within this 1 mile radius. The proposed expansion of the existing facility will not result in the conversion of these uses to non-agricultural use.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

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

Less Than Significant Impact: The proposed expansion of temporary residential use for alcohol and drug treatment and rehabilitation is consistent with growth projections for the Mountain Empire Subregional Area anticipated by SANDAG used in development of the RAQS and SIP. Operation of the project will result in emissions of ozone precursors that were considered as a part of the RAQS based on growth projections. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below the screening levels, and subsequently will not violate ambient air quality standards.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

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

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Land Use Environment Group (LUEG) has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), ~~the use of~~ the screening levels for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

Less Than Significant Impact:
The project proposes an expansion of a residential alcohol and drug treatment and recovery facility. Grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the LUEG guidelines for determining significance, as described in the Air Quality Technical Analysis prepared for the project by Scientific Resources Associated. Vehicle trips generated from the project will result in 49 additional Average Daily Trips (ADTs). ~~According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening level~~

~~criteria established by the guidelines for criteria pollutants.~~ Emissions of all criteria pollutants would be less than screening-level thresholds for project operations as described in the Air Quality Technical Analysis prepared for the project by Scientific Resources Associated. As such, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

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

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O_3). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) under the CAAQS. 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: 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.

Less Than Significant Impact: Air quality emissions associated with the project include emissions of PM_{10}, NO_x and VOCs from construction/grading activities, and also as the result of an increase in traffic from project implementation. However, grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, localized and temporary resulting in PM_{10} and VOC emissions below the screening-level criteria established by the LUEG guidelines for determining significance. The vehicle trips generated from the project will result in 49 Average Daily Trips (ADTs). Project construction and operational emissions would be below the County's screening level thresholds as demonstrated in the Air Quality Technical Analysis. ~~According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the LUEG guidelines for determining significance.~~

Emissions of nonattainment pollutants would be consistent with construction emissions evaluated in the RAQS and SIP for construction projects and would not be cumulatively considerable. In addition, because the project's operational emissions are less than the screening-level threshold for nonattainment pollutants, the project would not result in a cumulatively considerable impact.

d) Expose sensitive receptors to substantial pollutant concentrations?

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

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less Than Significant Impact: The project will introduce new "sensitive receptors" into the project area by increasing the number of beds for residential alcohol and drug treatment and rehabilitation. In addition, Campo Elementary School is located just under one-quarter mile south of the project site. However, the project will not generate substantial traffic and will not result in a Carbon Monoxide (CO) hotspot and less than significant impacts to sensitive receptors from CO would result. Project emissions would also be below the County's screening level thresholds for criteria pollutants and precursors.

Construction activities would result in temporary emissions of diesel particulate; however, given the short-term nature of the proposed construction, less than significant impacts would result from the construction phase and emissions will not contribute to cumulatively considerable impacts.

e) Create objectionable odors affecting a substantial number of people?

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

Less Than Significant Impact: The project could produce objectionable odors, which would result from volatile organic compounds, ammonia, carbon dioxide, hydrogen sulfide, methane, alcohols, aldehydes, amines, carbonyls, esters, disulfides dust and endotoxins from the construction and operational phases, including diesel exhaust from grading equipment. However, due to the temporary nature of construction activities and limited construction area, these substances would only be in very small amounts (less that 1 $\mu g/m^3$). Subsequently, no significant air quality – odor impacts are expected to affect surrounding receptors. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and will not contribute to a cumulatively considerable impact.

IV. BIOLOGICAL RESOURCES -- Would the project:

a) 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 CDFWU.S. Fish and Wildlife Service?

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

Less than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, site photos, and a Biological Resources Report dated January 16, 2014 prepared by Everett and Assoc., County staff biologist Maggie Loy has determined that the site and surrounding area supports some native vegetation, namely, southern mixed chaparral and non-native grassland. Sensitive plant (sticky geraea) and wildlife species (coastal western whiptail and western bluebird) were observed on the site. These species, though considered rare, are not considered threatened or endangered. The project site is currently developed with buildings for administration, housing, and activity areas, and the vicinity is developed to the north south and west with rural residential properties. The biological report indicates that impacts will be to 7.2 acres of southern mixed chaparral. The improvements are not expected to impact the noted sensitive plant species. Focused surveys for Quino Checkerspot, raptor nests and foraging, and large mammals, were negative. Therefore, removal of this habitat will not result in substantial adverse effects, either directly or through habitat modifications, to any candidate, sensitive, or special status species. Therefore, the impact is less than significant.

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

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

Less than Significant with Mitigation Incorporated: Based on an analysis of the County's Geographic Information System (GIS) records and a Biological Resources Report dated January 16, 2014 prepared by Everett and Associates, County staff biologist Maggie Loy has determined that the proposed project site contains southern mixed chaparral within the project boundaries. The project impacts to 7.2 acres of southern mixed chaparral community identified as sensitive in the County of San Diego Guidelines for Determining Significance for Biological Resources is significant and will be mitigated by conservation of 3.6 acres of compensatory land in an open space easement in the East County Focus Conservation Area.

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

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

No Impact: Based on an analysis of the County's Geographic Information System (GIS) records and a Biological Resources Report dated January 16, 2014 prepared by Everett and

Associates, County staff biologist Maggie Loy has determined that the proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts will occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.

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

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

Less than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, site photos, and a Biological Resources Report dated January 16, 2014 prepared by Everett and Associates, County staff biologist Maggie Loy has determined that the site has limited biological value and impedance of the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the proposed project for the following reasons: The vicinity is developed to the north, south and west, the site is developed. The proposed improvements include structures in an activity area which are adjacent to the existing development and adjacent to Buckman Springs Road where impacts due to construction and operation would be minimal. The proposed project includes paving of existing and proposed vehicle use areas which will lessen indirect impacts due to dust. Proposed trails are planned for existing paths and dirt roads where indirect impacts would have already occurred. Freedom Ranch does not allow biking, horseback riding or unsupervised hiking beyond the developed areas, so indirect impacts would be minimized.

The new residences would be adjacent to native habitat and there would be some additional noise and security lighting in that area. The project footprint would expand from 14 acres to 21 acres in a 112 acre site. The remainder of the site is southern mixed chaparral which is difficult to move through on foot for humans so human influenced indirect impacts would be reduced. The impact of having the new residential uses adjacent to the chaparral would be less than significant due to the regulated nature of the facility, the incorporation of the required fuel management area, and the nature of the dense chaparral. The project would not substantially interfere 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.

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

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

Less Than Significant Impact: Please refer to the attached Ordinance Compliance Checklist dated July 15, 2014. There are no adopted Habitat Conservation Plans, Natural Communities Conservation Plans, other approved local, regional or state habitat conservation plans, including Habitat Management Plans (HMP) or Special Area Management Plans (SAMP), that apply to the project. The project is not a project of interest under the Planning Agreement for the East County MSCP. The project complies with other local policies and ordinances that protect biological resources including the Resource Protection Ordinance (RPO).

V. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

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

No Impact: Based on an analysis of records and a survey of the property by County of San Diego approved archaeologist, Andrew Pigniolo, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, *"Cultural Resource Survey of the San Diego Freedom Ranch Major Use Permit Modification, Campo, San Diego, California"*, prepared by Andrew Pigniolo (January 2014).

b) 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: The project site has been surveyed by a County approved archaeologist, Andrew Pigniolo, and it has been determined that there are five archaeological sites present. An archaeological technical study entitled, *"Cultural Resource Survey of the San Diego Freedom Ranch Major Use Permit Modification, Campo, San Diego, California"* prepared by Andrew Pigniolo (January 2014) did not test the cultural sites for significance. Therefore, in the absence of testing, the cultural sites are designated both CEQA and RPO significant. One site (CA-SDI-17846) is a conglomeration of relocated mortars and pestles from the southwest and Mexico. As such, the resource is out of context. This site was determined not significant. Three (CA-SDI-20236, CA-SDI-20237, CA-SDI-20238) of the four remaining sites are located outside of the Major Use Permit boundaries. They will be avoided through project design. The final cultural site (CA-SDI-17845) is within the Major Use Permit boundaries but will be protected through its placement in an open space easement and the installation of temporary fencing during construction activities. The project

will also be conditioned with archaeological monitoring that includes a County-approved archaeologist and Native American monitor.

c) Directly or indirectly destroy a unique geologic feature?

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

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.

No 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.

d) Directly or indirectly destroy a unique paleontological resource or site?

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

No Impact: A review of the County's Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock and has no potential for producing fossil remains.

e) Disturb any human remains, including those interred outside of formal cemeteries?

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

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Andrew Pigniolo, it has been determined that the project will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report entitled, *"Cultural Resource Survey of the San Diego Freedom Ranch Major Use Permit Modification, Campo, San Diego, California"*, prepared by Andrew Pigniolo (January 2014). Requirements of project approval include compliance with the San Diego County Grading, Clearing, and Watercourse Ordinance (§87.101-87.804), CEQA §15064.5(d), and §7050.5 of the Health & Safety Code. Section 87.429 of the Grading, Clearance, and Watercourse Ordinance requires the suspension of grading operations when human remains or Native American artifacts are encountered.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, 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

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

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 all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Code ensures the project will 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 With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant With Mitigation Incorporated: The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Feasible foundation designs exist that can mitigate the liquefaction hazard (including liquefaction-induced lateral spreading). Prior to issuance of building permits, a geotechnical study shall be reviewed and approved which specifies foundation design adequate to preclude substantial damage to the proposed structure due to liquefaction. With a site-specific engineering design, impacts due to liquefaction would be less than significant.

iv. Landslides?

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

Less Than Significant Impact: : The project site is not within a "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 *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to 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% in grade because these soils are slide prone. Since the project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Result in substantial soil erosion or the loss of topsoil?

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

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as La Posta loamy coarse sand that has a soil erodibility rating of "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. However, the project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project will not result in unprotected erodible soils; will not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and will not develop steep slopes.
- The project has prepared a Stormwater Management Plan dated January 2014, prepared by Walsh Engineering & Surveying, Inc. The plan includes temporary construction, site design, source control, and treatment control Best Management Practices (BMPs) to ensure sediment does not erode from the project site.
- The project involves grading. However, the project is required to comply with the 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 minimizes the potential for water and wind erosion.

Due to these factors, it has been found that the project will not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, the project will not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the 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); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered.

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

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

Less Than Significant Impact: The proposed project involves 15,000 cubic yards of grading that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings (including those proposed on the project site) are adequately supported (whether on native soils, cut or fill), a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above.

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

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

Less Than Significant Impact: The project does not contain expansive soils as defined by Table 18-I-B of the Uniform Building Code (1994). The soils on-site are La Posta loamy coarse sand and Mottsville loamy coarse sand. These soils have a low shrink-swell behavior and represent no substantial risks to life or property. Therefore, the project will not create a substantial risk to life or property. This was confirmed by staff review of the Soil Survey for the

San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973.

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

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

Less Than Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project proposes a new OSWS for each proposed new building as shown on the Plot Plan. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCB to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH conceptually approved the project's OSWS design layout on May 7, 2014. Upon proposed project build out with Phase 4, the project is anticipated to generate 7,195 gallons of wastewater per day. In accordance with the project's approved Nitrate Mass Balance Study, once project effluent reaches half of this amount, wastewater must be pumped approximately 1,600 to 2,000 feet north to an adjacent basin to proposed OSWS's. Therefore, the project is consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.

VII. GREENHOUSE GAS EMISSIONS – Would the project

The responses to a) and b) below were revised due to pending litigation regarding the County's Climate Action Plan (CAP) and the release of updated guidance in 2015 by Planning & Development Services to address GHG emissions.

a) 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

Less Than Significant Impact: Greenhouse Gas (GHG) Emissions are said to 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 (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region[1] identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

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, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the ~~greenhouse gas~~GHG emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing ~~greenhouse gas~~GHG emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing ~~greenhouse gas~~GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional ~~greenhouse gas~~GHG reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. The County of San Diego has also adopted various GHG related goals and policies in the General Plan.

It should be noted that an individual project's GHG emissions will 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 15130(f) states that an EIR shall analyze ~~greenhouse gas~~GHG emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

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[1] San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center (EPIC), September 2008.

~~The County has prepared *Guidelines for Determining Significance* and *Report Format and Content Requirements* for addressing climate change in CEQA documents. The County has also adopted a Climate Action Plan (CAP) that includes GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32. A set of project-specific implementing thresholds are included in the Guidelines that will be used to ensure consistency of new projects with the County's CAP and the GHG emission reduction target. Development projects that could have cumulatively considerable GHG emissions impacts would need to incorporate relevant measures from the County's CAP and use one of the implementing thresholds from the Significance Guidelines Efficiency Threshold, Bright Line Threshold, Stationary Source Threshold, or Performance Threshold to assess significance. The Bright Line Threshold of 2,500 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year is used to assess the project's impacts.~~

~~GHG emissions associated with the project would be below the Bright Line Threshold of 2,500 metric tons per year. Project GHG impacts would not be cumulatively considerable.~~

The County has prepared a *Recommended Approach to Addressing Climate Change in CEQA Documents*, 2015 GHG Guidance. The guidance recommends a 900 metric ton screening level to identify those projects that would require further analysis and mitigation measures for GHG impacts. The 900 metric ton screening threshold is based on a threshold included in the California Air Pollution Control Officers Association (CAPCOA) white paper[2] that covers methods for addressing GHG emissions under CEQA. The CAPCOA white paper references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation. The 900 metric ton threshold was based on a review of data from four diverse cities (Los Angeles in southern California and Pleasanton, Dublin, and Livermore in northern California) to identify the threshold that would capture at least 90% of the residential units or office space on the pending applications list. This threshold will require a substantial portion of future development to minimize GHG emissions to ensure implementation of AB 32 targets is not impeded. By ensuring that projects that generate more than 900 metric tons of GHG implement mitigation measures to reduce emissions, it is expected that a majority of future development will contribute to emission reduction goals that will assist the region in meeting its GHG reduction targets.

The project is proposing the expansion of an alcohol and drug treatment and recovery facility for a net increase of 75 beds. The project would generate GHG emissions during construction and operations. Construction emissions would be associated with use of off-road equipment onsite and mobile source emissions from worker and vendor trips. Operational emissions would be associated with visitor trips, electricity and natural gas consumption, water consumption and solid waste generation. GHG emissions for the project were estimated using the California Emissions Estimator Model (CalEEMod Version 2013.2.2). Emissions were estimated for the net increase in number of beds using trip generation and project-specific data

[2] See CAPCOA White Paper : "CEQA &Climate Change: *Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act* " January 2008 (http://www.capcoa.org/rokdownloads/CEQA/CAPCOA%20White%20Paper.pdf).

from the project description. The project was assumed to be operational in 2017 after an 18-month construction period, consistent with the assumptions and emissions modeling in the Air Quality Technical Analysis (February 2013).

The project would generate an average of approximately 396 metric tons of carbon dioxide equivalent (CO_2e) during construction. The project's annual operational emissions would be approximately 335 metric tons of CO_2e per year. The project's total construction emissions were amortized over a 20-year period, consistent with County guidance. Accounting for the amortized construction emissions, the project's total annual emissions would be 375 metric tons CO_2e per year. Therefore, the project's emissions would be below the annual 900 metric ton screening level. Project GHG impacts would not be cumulatively considerable.

Furthermore, projects that generate less than ~~2,500 $MTCO_2e$~~ 900 metric tons CO_2e per year of GHG will also participate in emission reductions because air emissions including GHGs are under the purview of ~~the California Air Resources Board (~~CARB~~)~~ (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions[3], large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources[4]. As a result, even the emissions that result from projects that produce less than ~~2,500 $MTCO_2e$~~ 900 metric tons per year of GHG will be subject to emission reductions.

Therefore, it is determined that the project would result in less than cumulatively considerable impacts associated with GHG emissions and no mitigation is required.

b) 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 With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Less Than Significant Impact: In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the ~~greenhouse gas~~GHG emissions reduction goal for the State of California into law. The law requires that by 2020, State

[3] On September 15, 2009, the United States Environmental Protection Agency (EPA) and the Department of Transportation's National Highway Safety Administration (NHTSA) proposed a national program to reduce GHG emissions and improve fuel economy for new cars and trucks sold in the United States. The proposed standards would cut CO_2 emissions by an estimated 950 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program.

[4] California's Renewable Portfolio Standard (RPS) requires electric corporations to increase procurement from eligible renewable energy resources by at least 1% of their retail sales annually, until they reach 20% by 2010. In 2008, the governor signed Executive Order S-14-08 (EO) to streamline California's renewable energy project approval process and increase the state's Renewable Energy Standard to 33% renewable power by 2020. The Air Resources Board is in the process of developing regulations to implement the 33% standard known as the California Renewable Electricity Standard (RES).

emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires ~~the California Air Resources Board (~~ARB~~)~~ to set regional targets for the purpose of reducing ~~greenhouse gas~~GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego's General Plan incorporates various climate change goals and policies. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets~~ identified in the Climate Action Plan~~. The County's Climate Action Plan (CAP) ~~includes~~ included GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32. ~~A set of project-specific implementing thresholds are included in the County's Guidelines for Determining Significance and are used to ensure project consistency with the County's CAP, GHG emission reduction target, and the various General Plan goals and policies related to GHG emissions that support CAP goals.~~

~~As discussed in VII(a) above, the project's emissions would be below the Bright Line Threshold and would be consistent with the General Plan. As such, the project would not conflict with the County CAP or GHG goals and policies of the General Plan. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.~~

However, due to pending litigation on the CAP, the County can no longer rely on the Plan for CEQA streamlining. Until local plans are updated/adopted to address GHG emissions, the project is evaluated to determine whether it would impede the implementation of AB 32 GHG reduction targets. For the reasons discussed in the response to question VII.a), the project's GHG emissions would be below the screening level recommended by CAPCOA and therefore, it would not impede the implementation of AB 32 reduction targets. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through

reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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

Less Than Significant With Mitigation Incorporated: The project proposes and expansion of a residential alcohol and drug treatment and rehabilitation facility which involves the routine use and storage of hazardous materials. 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.

However, the project proposes to demolish, remove, or renovate structures on site that were constructed prior to 1980 and that may contain Lead Based Paint (LBP) and Asbestos Containing Materials (ACMs). 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 CCR Division 4.5, the worker health and safety requirements (Title 8 CCR Section 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, CalEPA, and the CalOSHA. Demolition or renovation operations that involve asbestos-containing materials must conform to San Diego Air Pollution Control District (SDAPCD) Rules 361.140-361.156. In accordance with existing regulations, the project will be required to complete asbestos and lead surveys to determine the presence or absence of ACMs or LBP prior to issuance of a building permit that includes demolition of onsite structures and prior to commencement of demolition or renovation activities.

The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan

facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections will occur in compliance with local, State, and Federal regulation; the project will result in less than significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

b) 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

No Impact: The project is not located within one-quarter mile of an existing or proposed school and will involve only the routine use and storage of hazardous materials. Therefore, the project will not have any effect on an existing or proposed school.

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

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

No Impact: Based on a site visit and regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank**,** and is not located on a site with the potential for contamination

from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

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

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

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, 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 will not constitute a safety hazard for people residing or working in the project area.

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

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

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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

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 will not interfere with this plan because it will 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 will 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 will 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 will 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 will not be interfered with because the project is not located within a dam inundation zone.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

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

Less Than Significant Impact: The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code.

Implementation of these fire safety standards will occur during the building permit process. Also, a Fire Service Availability Letter and conditions, dated March 1, 2012, have been

received from the San Diego County Fire Authority, and a Fire Protection Plan –Letter Report prepared by Wash Engineering & Surveying, Inc. has been accepted as complete. The conditions from the San Diego County Fire Authority include: Fire access roads must meet County Fire Code requirements; Dead-end roads or driveways more than 150 feet in length must provide an approved means for turning around fire apparatus; Fuel modification zone of not less than 100 feet is required around all structures; New buildings and garages shall be equipped with fire sprinklers to appropriate NFPA 13 Standards; and, Water storage tanks, waterlines, and hydrants must be installed and capable of full required fire flow. The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be 6.6 minutes. The Maximum Travel Time allowed pursuant to the County Safety Element is 20 minutes. Therefore, based on the review of the project by San Diego County Fire Authority, through compliance with the County Fire Code, and through compliance with the San Diego County Fire Authority conditions, the project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the County Fire Code.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ 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 will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by Robert Hingtgen on April 24, 2012 none of these uses are present on adjacent properties. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

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

Less Than Significant Impact: A Major Stormwater Management Plan (SWMP) was prepared by Walsh Engineering & Surveying, Inc. (January 2014) for the project. The project site proposes and will be required to implement temporary construction BMPs, site design measures, source control BMPs and treatment control BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff. The Major SWMP

demonstrates that implementation of these measures will enable the project to meet waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001 and amendments), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

Finally, the project's conformance to the waste discharge requirements listed above ensures the project will not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project will conform to Countywide watershed standards in the JURMP and SUSMP, derived from State regulation to address human health and water quality concerns. Therefore, the project will not contribute to a cumulatively considerable impact to water quality from waste discharges.

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 Canyon City hydrologic subarea (911.82), within the Tijuana hydrologic unit. The project is many miles upstream from impaired waters located in the lower reaches of the Tijuana River. As discussed above, the project will implement all appropriate BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff. The proposed BMPs are consistent with regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result the project will 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 storm water permitting regulation for County of San Diego includes the following: San Diego Region, Order No. R9-2007-0001, (NPDES No. CAS 0108758) and amendments; County Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO); 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 will 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 Watershed Protection Ordinance has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Therefore, the project will not result in an increase in any pollutants already impairing the lower reaches of the Tijuana River.

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 Regional Water Quality Control Board 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 Canyon City hydrologic subarea (911.82), within the Tijuana hydrologic unit that has the following existing and potential beneficial uses for inland surface waters: contact water recreation; non-contact water recreation; warm freshwater habitat; and, wildlife habitat. This hydrologic subarea also has the following beneficial uses for groundwater: municipal and domestic supply; agricultural supply; and, industrial service supply.

The project may generate the following pollutants: sediment, nutrients, litter, oxygen demanding substances, oil & grease, bacteria, and viruses. However, the project will implement temporary construction BMPs, site design measures, source control BMPs and treatment control BMPs in accordance with the project's Major SWMP to reduce potential pollutants in runoff to the maximum extent practicable, such that the proposed project will not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. .

In addition, the proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project will not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section VIII., Hydrology and Water Quality, Question b, for more information on regional surface water and storm water planning and permitting process.

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

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

Less Than Significant Impact: The modification of the Major Use Permit will result in increased groundwater use. Existing groundwater use at the facility is estimated to be approximately 4.4 acre-feet per year for 50 men in active treatment, 8 staff members, a garden, ducks, and a small orchard. The modification of the Major Use Permit would increase groundwater use to 10 acre-feet per year which includes 125 men in active treatment, 16 staff, a garden, ducks, and a small orchard. A groundwater investigation was prepared by AECOM dated June 2013 to evaluate potential direct and cumulative impacts from the increased pumping of groundwater at the facility. The investigation concluded that the increased groundwater pumping will have a less than

significant direct and cumulative impact on groundwater resources. To ensure proper management of groundwater resources, the project will be conditioned to cap groundwater use at a maximum of 10 acre-feet of pumping per year. Groundwater levels will also be required to be monitored for the life of the project and reported to PDS on an annual basis. Therefore, the changes in the project will not substantially deplete groundwater resources or interfere substantially with groundwater recharge.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

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

Less Than Significant Impact: As outlined in the Storm water Management Plan (SWMP) dated January 2014, the project will implement temporary construction BMPs, site design measures, source control BMPs, and treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. These measures will control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). The SWMP specifies and describes the implementation process of all BMPs that will address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The Department of Public Works will ensure that the Plan is implemented as proposed. In addition, the project does not propose to alter existing site drainage patterns of alter the course of a stream or river. Due to these factors, it has been found that the project will not result in significantly increased erosion or sedimentation potential and will not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation will be controlled within the boundaries of the project, the project will not contribute to a cumulatively considerable impact. For further information on soil erosion refer to VI., Geology and Soils, Question b.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

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

Less Than Significant Impact: The proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons, based on a Drainage Study prepared by Walsh Engineering and Surveying on March 20, 2012:

a. Drainage will be conveyed to either natural drainage channels or approved drainage facilities.
b. The project will not increase water surface elevation in a watercourse with a watershed equal to or greater one square mile by 1 foot or more in height.
c. The project will not increase surface runoff exiting the project site equal to or greater than one cubic foot/second.

Therefore, the project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Moreover, the project will not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project will not substantially increase water surface elevation or runoff exiting the site, as detailed above.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

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

Less Than Significant Impact: The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems. The project will increase runoff by 0.6 cfs, and this will result in no measurable increase in flow depth, width, or velocity

h) Provide substantial additional sources of polluted runoff?

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

Less Than Significant Impact: The project does not propose any substantial additional sources of polluted runoff: Refer to IX Hydrology and Water Quality Questions a, b, c, for further information.

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

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

Less Than Significant: Drainage swales, which are mapped on a FEMA floodplain map, a County Floodplain Map or have a watershed greater than 25 acres were identified on the project siteHowever, the project is not proposing to place structures with a potential for human

occupation within these areas. The existing dirt road that crosses the onsite drainage will be surfaced with Portland Cement Concrete to provide all-weather access to the new dining hall and four of the new dormitories. This will not impede or redirect the flow and will not limit access during flood events or affect downstream properties.

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

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

Less Than Significant: The project site contains drainage swales, which are identified as being 100-year flood hazard areas. However, the project is not proposing to place structures, access roads or other improvements which will impede or redirect flood flows in these areas. The existing dirt road that crosses this drainage will be surfaced with Portland Cement Concrete to provide all-weather access to the new dining hall and four of the new dormitories. This will not impede or redirect the flow.

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

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

Less Than Significant: A portion of the project driveway is located within the inundation limits of the 100-year storm. However, the proposed residential dormitories and dining hall are located at an elevation that would prevent exposure of people or property to flooding. In addition the Drainage Study submitted to the Department of Public Works identified no erosion or sedimentation hazards that would result in a potential flooding hazard. The portion of the driveway within the 100-year storm inundation limits will be paved with Portland Concrete Cement, and will have a maximum flow depth of 10 inches during a 10-year storm and the 100-year storm will be contained within the same limits as they currently exist. The project will not place any other access roads or other improvements which will expose people or structures to a significant risk of loss, injury or death involving flooding.

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

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

No Impact: The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately

downstream of a minor dam that could potentially flood the property. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

m) Inundation by seiche, tsunami, or mudflow?

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

Discussion/Explanation:

i. SEICHE

No Impact: The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

ii. TSUNAMI

No Impact: The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

Less Than Significant Impact: Mudflow is type of landslide. The site is not located within a landslide susceptibility zone. In addition, though the project does propose land disturbance that will expose unprotected soils, the project is not located downstream from unprotected, exposed soils within a landslide susceptibility zone. Therefore, it is not anticipated that the project will expose people or property to inundation due to a mudflow.

X. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

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

No Impact: The project does not propose the introduction of new infrastructure such as major roadways, water supply systems or utilities to the area. Therefore, the proposed project will not significantly disrupt or divide the established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- ☐ Potentially Significant Impact
- ☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The proposed project is subject to the General Plan Semi-Rural and Rural Lands Regional Categories and contains lands within the Semi-Rural 10 (SR-10) and Rural Lands 20 (RL-20) Land Use Designations. The project is also subject to the policies of the Mountain Empire Subregional Plan. Freedom Ranch is classified as a Major Impact Services and Utility by the County Zoning Ordinance (Section 1350). The property is zoned S92 General Rural which allows for the proposed expansion of the facility to be permitted with a Major Use Permit Modification pursuant to the Zoning Ordinance Section 2926.b.

Based on a Land Use & Community Character Analysis prepared by Laurie Price, AICP, the project will not conflict with the San Diego County General Plan, Mountain Empire Subregional Plan, or Board of Supervisors Goals or Policies related to mitigating environmental effects. Furthermore, the project has also been shown to comply with various County ordinances adopted for mitigating environmental effects. Please refer to the Land Use & Community Character Analysis (January 2014) and attached Ordinance Compliance Checklist dated July 15, 2014 for additional information.

XI. MINERAL RESOURCES -- Would the project:

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

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

Less Than Significant Impact:
The lands within the project site have not been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997). The project site is underlain by Cretaceous granitic rocks of the Peninsular Ranges batholith, or Upper Jurassic and Lower Cretaceous Santiago Peak metavolcanics, or Tertiary marine and non-marine sedimentary formations, which may contain mineral resource deposits suitable for crushed rock. However, due to the expensive mining and processing of crushed rock combined with transportation costs, this currently restricts crushed rock operations to urbanized areas within the Western San Diego Consumption Region of the County. Therefore, no potentially significant loss of availability of a known mineral resource of value to the region and the residents of the state will occur as a result of this project. Moreover, if the resources are not considered significant mineral deposits, loss of these resources cannot contribute to a potentially significant cumulative impact.

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

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

No Impact: The project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource(s).

Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

XII. NOISE -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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

Less Than Significant Impact:

General Plan – Noise Element

The project is a Major Use Permit Modification comprised of an expansion to an existing residential alcohol and drug treatment and recovery facility. The project modification is to add five dormitories and a dining hall. All noise sensitive areas on the project site would be exposed to future traffic noise levels less than 60 dBA CNEL in compliance with the Noise Element. Off-site direct and cumulative noise impacts from the additional project traffic contributions are minimal and are considered less than significant.

Noise Ordinance – Section 36.404

The project changes are subject to the County Code Noise Ordinance which regulates all permanent and temporary noise generating operations and activities. Permanent noise sources were identified as ground level HVAC units adjacent to each new building, including the dormitories, dining hall, and the living facility. The operations of the mechanical equipment would generate noise levels ranging from 30 dBA to 37 dBA at the southern property line (worst-case) which is below the 45 dBA requirement at the project property lines. Changes to the project associated with permanent noise sources would be considered less than significant and would comply with County noise standards.

Noise Ordinance – Section 36.409

Temporary construction equipment associated with the Major Use Permit Modification were also evaluated and determined to produce up to 75 dBA at the northwestern property line corner near dormitory 1 and at the southern property line near the living facility. The project would meet the 75 dBA eight hour average temporary construction noise requirement as levels have been identified to be 75 dBA and less at all property lines. Construction operations will occur only during permitted hours of operation pursuant to Section 36.409.

A Noise Analysis Report prepared for the project by Kimley-Horn and Associates, Inc., demonstrates that all noise sensitive areas on the site would be exposed to traffic noise levels less than 60 dBA CNEL, that project operational noise levels would be below 45 dBA Leq at the property lines, and that construction noise levels would be below 75 dBA Leq (8-hour) at the property lines. Please see the Noise Analysis Report (December 2012) for additional information.

Finally, 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 will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive areas; and the project will 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, the project will 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) Exposure of persons to or 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 and expansion of a residential alcohol and drug treatment facility where low ambient vibration is essential for sleeping conditions. However, the facilities are setback 200 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more. A setback of 200 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment* 1995). In addition, the setback ensures that the project will not be affected by any past, present or future projects that may support sources of groundborne vibration or groundborne noise.

Also, 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.

Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

c) A substantial permanent 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 Impact: The project will include additional HVAC units associated with the new dormitories and dining hall that may increase the ambient noise level. However, as indicated in the response listed under Section XI Noise, Question a., the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control.

d) 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 Impact: The project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor sound systems.

Also, general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), which are derived from State regulations to address human health and quality of life concerns. Construction operations will occur only during permitted hours of operation pursuant to Section 36-410. Also, it is not anticipated that the project will operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

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

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

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the

project will not expose people residing or working in the project area to excessive airport-related noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

XIII. POPULATION AND HOUSING -- Would the project:

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

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

No Impact: The proposed project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

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

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

No Impact: The proposed expansion will not displace existing housing. The number of beds available for temporary transitional living clients will increase from five to between 12 and 25.

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

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

No Impact: The proposed project will not displace existing housing but will increase the number of staff, clients, and transitional living clients on site from 66 to between 120 and 133 if and when all four proposed phases are constructed.

XIV. 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 With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Based on the service availability forms received for the project, the proposed project will not result in the need for significantly altered services or facilities. Service availability forms have been provided which indicate existing fire protection services are available to the project from the County Fire Authority. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

XV. 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 With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project does not propose an increase in residential growth that would increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. The project does propose an increase in residential use; however, this use is temporary with residents staying at the facility for a period of up to four months. Clients do not typically have access to personal vehicles while at the facility and typically remain onsite for the duration of their treatment. Freedom Ranch provides some limited recreational opportunities for their clientele onsite.

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 With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Although the project does not proposed to develop new onsite recreational facilities, it will dedicate trail easements to the County on as shown on the Plot Plan. The easements will be located along existing dirt roads both within and outside of an existing SDG&E easement for the Sunrise Powerlink. Because the trail easements are located along already existing dirt roads, additional improvements are not anticipated. However, potential impacts related to the trail easements have been addressed in the Biological Technical Report and Cultural Resources Survey that were prepared for the project. Specifically, refer to Sections IV and V for more information.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

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

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

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

Less Than Significant Impact: The proposed project is anticipated to result in an additional 49 ADT. However, the project will not have a direct impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project trips do not exceed any of the County's Guidelines for Determining Significance for direct impacts related to Traffic and Transportation. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips 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. Therefore, the project would not have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The additional 49 ADT will be distributed on Mobility Element roadways in the County some of which currently or are projected to operate at inadequate levels of service. The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The Transportation Impact Fee (TIF) program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. These new projects were based on SANDAG regional growth and land use forecasts, the SANDAG Regional Transportation Model was utilized to analyze projected build-out (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies will be corrected through improvement projects funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's Regional Transportation Plan (RTP). This plan, which considers freeway buildout over the next 30 years, will use funds from TransNet, State, and Federal funding to improve freeways to projected level of service objectives in the RTP.

Although these project trips therefore contribute to a potential significant cumulative impact, the potential growth represented by this project was included in the growth projections upon which the TIF program is based. By ensuring TIF funds are spent for the specific roadway improvements identified in the TIF Program, the project's potential cumulative impact is rendered less than cumulatively considerable and not significant pursuant to CEQA Section 15130(a)(3). Payment of the TIF is required at issuance of building permits.

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

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

The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the Regional Transportation Plan (RTP) of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System (MTS) and the North County Transit District (NCTD) is required to ensure that the impacts of new development on CMP transit performance measures are identified.

Less Than Significant Impact: The project proposes an increase of 49 ADTs which does not exceed the 2400 trips (or 200 peak hour trips) required for study under the region's Congestion Management Program. Additionally, the project does not propose a new primary use. Therefore the project will not conflict with travel demand measures or other standards of the congestion management agency.

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

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

No Impact: The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport; therefore, the project will not result in a change in air traffic patterns.

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

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

Less Than Significant Impact: The proposed project will not significantly alter roadway geometry on Buckman Springs Road. A safe and adequate sight distance shall be required at all driveways and intersections to the satisfaction of the Director of the Department of Public Works. The project will construct a northbound right-turn deceleration lane on Buckman Springs Road at its driveway entrance as shown on the Plot Plan. All road improvements will be constructed according to the County of San Diego Public and Private Road Standards. The proposed project will not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project will not significantly increase hazards due to design features or incompatible uses.

e) Result in inadequate emergency access?

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

Less Than Significant: The proposed project will not result in inadequate emergency access. The San Diego County Fire Authority, which is the Fire Authority Having Jurisdiction, has reviewed the proposed project, associated access roadways, and Fire Protection Plan – Letter Report, and has determined that there is adequate emergency fire access proposed. The main project access driveway will meet County Fire Code requirements and the access driveway for Phase 4 will provide an approved means for fire apparatus to turn around.

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

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

Less Than Significant: The proposed project is an expansion of an alcohol and drug rehabilitation facility and will generate an additional 49 ADT. Project implementation will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. The project will improve a San Diego Metropolitan Transit System bus stop along northbound Buckman Springs Road at the project's main driveway access as shown the Plot Plan by providing a 6-foot wide by 8-foot long decomposed granite drop off pad. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. Therefore, the project will not conflict with policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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

Less Than Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project proposes a new OSWS for each proposed new building as shown on the Plot Plan. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and

maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH conceptually approved the project's OSWS design layout on May 7, 2014. Upon proposed project build out with Phase 4, the project is anticipated to generate 7,195 gallons of wastewater per day. In accordance with the project's approved Nitrate Mass Balance Study (which was reviewed by RWQCB and DEH staff), once project effluent reaches half of this amount, wastewater must be pumped approximately 1,600 to 2,000 feet north to an adjacent basin to proposed OSWS's. Therefore, the project is consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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

No Impact: The project does not include the construction of new or expanded water or wastewater treatment facilities from a service district which could cause significant environmental effects.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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

Less Than Significant Impact:
The project's proposed treatment control BMPs include several bio-retention areas to treat runoff from proposed parking lots, building pads, and paved access driveway. Refer to the project Major SWMP dated January 2014 for more information. However, as outlined in this Environmental Analysis Form, the new facilities will not result in adverse physical effect on the environment. Specifically, refer to Sections IV and V for more information.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- ☐ 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 groundwater dependent area and the project proposal to expand the facility will result in increased groundwater use. Existing groundwater use at the facility is estimated to be approximately 4.4 acre-feet per year for 50 men in active treatment, 8 staff members, a garden, ducks, and a small orchard. The modification of the Major Use Permit would increase groundwater use to 10 acre-feet per year which includes 125 men in active treatment, 16 staff, a garden, ducks, and a small orchard. A groundwater investigation was prepared by AECOM dated June 2013 to evaluate potential direct and cumulative impacts from the increased pumping of groundwater at the facility. The investigation concluded that the increased groundwater pumping will have a less than significant direct and cumulative impact on groundwater resources. To ensure proper management of groundwater resources, the project will be conditioned to cap groundwater use at a maximum of 10 acre-feet of pumping per year. Groundwater levels will also be required to be monitored for the life of the project and reported to PDS on an annual basis. Therefore, sufficient water supplies are avaialbe to serve the project.

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

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

No Impact: The proposed project will rely completely on an on-site wastewater system (septic system); therefore, the project will not interfere with any wastewater treatment provider's service capacity.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

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

Less Than Significant Impact: Implementation of the project will generate solid waste. 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 the California Integrated Waste Management Board (CIWMB) 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.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

g) Comply with federal, state, and local 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: Implementation of the project will generate solid waste. 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 the California Integrated Waste Management Board (CIWMB) 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 project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential 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, 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: Per the instructions for evaluating environmental impacts in this Initial Study, the potential 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 the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly southern mixed chaparral habitat and cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes preserving compensatory habitat in the East County Focus Conservation Area, and placing the cultural resource site in open space. 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

Discussion/Explanation:

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
Star Ranch (4900 feet south) – Aesthetics, Air Quality, Biological and Cultural Resources, Land Use, and Traffic.	PDS2005-3800-05-008, PDS2005-3810-05-002, PDS2005-3600-05-019, PDS2005-3100-5459
Buckman Springs Borrow Pit (2900 feet south), approved in 2006 for 50 year extension – Aesthetics, Biological Resources, Hazards, Hydrology/Water Quality, Land Use/Community Character, Traffic	PDS2005-3301-71-519-03
Bartlett TPM (4900 feet west), approved end of 2005 – Biological and Cultural Resources, Traffic	PDS2003-3200-20754
Arellano TPM (6,000 feet northwest), approved Jan 2009 – Biological Resources, Traffic	PDS2003-3200-20756
Mountain Health and Community Services, Campo Health Center, Grading Plan (7,900 feet southeast) - Aesthetics, Biological and Cultural Resources, Land Use, and Traffic	PDS2014-LDGRMJ-00013
Cameron Solar, Major Pre-Application (5,200 feet west) – Aesthetics, Biological and Cultural Resources, Land Use, and Traffic	PDS2014-MPA-14-019

Less than Significant: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVII of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. 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 the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the following Geology and Soils (Section VI.a.iii) and Hazards and Hazardous Materials (Section VIII.a). However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes reviewing and approving a geotechnical study which specifies foundation design adequate to preclude substantial damage to the proposed structures due to potential liquefaction, and completing asbestos and lead surveys to determine the presence or absence of ACMs or LBP in structures to be demolished, prior to issuance of building permits. 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.

XIX. 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.

AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283. (http://www.leginfo.ca.gov/)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm)

Conceptual Landscape Plan, Laurie Price, January 2014

County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. ((www.co.san-diego.ca.us)

County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)

County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. (www.co.san-diego.ca.us)

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