DRAFT ENVIRONMENTAL IMPACT REPORT

Edgemoor Facility Demolition
MH7922
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Lead Agency:

County of San Diego
Department of General Services, Facilities Management Division
5555 Overland Avenue, Suite 2207, Building 2, Room 220
San Diego, CA 92123-1294
Contact: Dahvia Lynch, AICP, Project Manager
(858) 694-2047
Contact: Betty Dehoney, Environmental Coordinator
(858) 712-8400

Preparer:

Betty Dehoney
HDR Engineering, Inc.
8690 Balboa Avenue, Suite 200
San Diego, CA 92123-1502

Project Proponent:

April F. Heinze, P.E., Director
Department of General Services,
County of San Diego

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ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
APCD	Air Pollution Control District
BMP	Best Management Practice
Cal EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CBC	California Building Code
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CH_4	Methane
CHBC	California Historical Building Code
CINA	Capital Improvements Needs Assessment
CNPS	California Native Plant Society
CO_2	carbon dioxidenitrous oxide
CO_2e	carbon dioxidenitrous oxide equivalent
CSC	California Species of Concern
CUPA	Certified Unified Program Agency
DDA	Development and Disposition Agreement
DEH	Department of Environmental Health
EIR	Environmental Impact Report
GHG	Greenhouse gas
HABS	Historical American Building Survey
HMD	Hazardous Materials Division
LCDF	Las Colinas Detention Facility
LBP	Lead-Based Paint
MBTA	Migratory Bird Treaty Act
MMT	Million metric ton
MSCP	Multiple Species Conservation Program
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
N_2O	Nitrous oxide
OHP	Occupational Health Program
SDAPCD	San Diego Air Pollution Control District
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service

SUMMARY

S.1 Project Synopsis

The Edgemoor Facility Demolition project (project) proposes the demolition and removal of 26 historical buildings within the City of Santee (Table S.1-1).[1] There are 27 total structures on the site, and all on-site structures are treated as historical resources due to their contribution to the overall context of the site. The 26 buildings proposed for demolition are currently associated with the Edgemoor Geriatric Hospital, which is owned and operated by the County of San Diego, as well as other buildings that surround the hospital. Since their construction (ranging from 1913 to 1961), most of the buildings have been in continual use. Five of the buildings have been vacant since the early 1980s. One of the buildings is used by the Santee Food Bank on an interim basis unrelated to the hospital operations[2]. One building, the Polo Barn, will be retained on site since it is listed in both the National Register of Historical Places and the California Register of Historical Resources.

No development is proposed as part of the project. New development consistent with the City of Santee's General Plan or Town Center Specific Plan could be built on-site in the future. Environmental review has been completed for both the City's General Plan and Town Center Specific Plan. The project does not propose any modifications to any planned land uses that differ from any adopted plan. Furthermore, any future development on the project site would require separate environmental review.

The project site is located within the Master Plan Boundary identified in the Santee Town Center Specific Plan (Specific Plan) Amendment and EIR (SCH No. 1999031096), which was approved by City of Santee on February 8, 2006. The Santee Town Center Specific Plan Amendment serves as the Master Plan for the site as more particularly described in Section 108 of a Development and Disposition Agreement (DDA) between the County of San Diego and Ryan Companies US, Inc approved by the County's Board of Supervisors on December 9, 2003. The DDA provides Ryan with development rights for the County-owned property south of the San Diego River in Santee located outside of the Sheriff's Department Las Colinas facility. The Master Plan component of the DDA implements the provisions of Board of Supervisors Policy F-38 Edgemoor Property Development that address preparation of a comprehensive master plan for the management and development of the property in consultation and cooperation with the City of Santee.

In 2004, the San Diego County Board of Supervisors concluded that the buildings comprising the Edgemoor Geriatric Hospital were obsolete and deteriorating and that it would be more cost effective to build a new hospital than to rehabilitate the old buildings. In addition, the Board of Supervisors adopted Policy F-38 that establishes future development policy for the project site with the goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.

As part of a separate project, a new skilled nursing facility is under construction and is scheduled to be ready for occupancy in late 2008. This new facility will be a 160,000 square foot state-of-the-art skilled nursing complex and will be located northeast of the Polo Barn. Current patients and staff at the Edgemoor Geriatric Hospital will be transferred to this new facility at that time. Once the patients and

[1] It should be noted that while there is a total of 27 buildings located on-site, Building 10 (Polo Barn) would be preserved and is not proposed for demolition.

[2] Three of the buildings proposed for removal by the proposed project (#13 Rehabilitation Building, #16 Dietary Building, and #17 Santa Maria building) are also proposed for removal by the Las Colinas Detention Facility (LCDF) project. A separate EIR (SCH# 2006091036) is being prepared for the LCDF project.

staff have been transferred, all of the buildings at the current facility would become unoccupied. Once the new facility is operative, no use for the existing facilities on the project site has been identified. Once the patients and staff are relocated, the unoccupied buildings would pose a public health and safety hazard. Unoccupied structures attract illegal activities.

Foreseeable events occurring as a result of unauthorized entry to unoccupied buildings could include personal injury, property damage, fire, and vandalism. The buildings would pose a public heath and safety hazard due to the presence of asbestos containing materials (ACM) and lead-based paint (LBP). If the buildings are abandoned and no longer maintained, the risk of exposure to ACM or LBP would be difficult to monitor and the unknowing public could accidentally be exposed to these substances. Elimination of the risk of danger would be necessary to protect trespassers from harm, as well as the general public from unauthorized or unlawful activities that could occur at the property.

Additionally, the cost of maintenance of unoccupied buildings is not justified, as the money dedicated to the maintenance of the unoccupied buildings could better be applied to other capital and major maintenance projects.

Demolition activities would commence when the new Skilled Nursing Facility is operational and all patients and staff have been transferred to the new facility (late 2008)[3]. As identified above, construction of the new skilled nursing facility was processed under separate environmental review and is not included as part of the proposed project. All demolition activities associated with the proposed project would only occur in previously developed or disturbed areas of the project site. No excavation, grading, vehicle movement, or transport of materials is proposed in undisturbed natural areas. Generally, the existing landscaping would be left in place except in areas where the removal of vegetation is necessary to demolish the structures (e.g., vegetation located so close to the buildings that removal of the building damages the vegetation).

The proposed project includes demolition and removal of the following:

- Twenty-six buildings and foundations;
- Concrete walkways, curbs, and walls;
- Some site lighting (e.g., around buildings); and
- Minimal landscaping near the buildings (with the exception of the oak trees).

It is estimated that demolition and exportation of demolition material would occur over approximately 180 days. The demolition portion is assumed to take up to 120 days and would be limited to 260 cubic yards of material per day. Existing storm drain systems would remain intact. Any unnecessary underground irrigation, piping, plumbing, and electrical systems would be properly capped and plugged below grade. As identified above, some landscaping (e.g., shrubs around buildings) would be removed incidental to demolition; however, all oak trees located on-site would remain.

Once demolition of any structure commences, no unauthorized person would be permitted to enter the construction area. Fencing would be installed surrounding the work area at least a distance equivalent to the height of the building. This buffer would provide an adequate work space to safely demolish the buildings and provides an area for staging equipment and debris. Demolition would be conducted in compliance with the County's Noise Abatement and Control Ordinance. Furthermore, although the City of Santee Noise Ordinance (Chapter 8.12.290 of the City's Municipal Code) does not apply to this

[3] The new Skilled Nursing Facility was analyzed in a previous Mitigated Negative Declaration.

County project, demolition equipment activities would be limited to between the hours of 7 a.m. and 7 p.m. which is consistent with the County and City Noise Ordinances. Site security would be provided during non-construction hours. Access to the project site for demolition and hauling equipment would be provided via Edgemoor Drive. Existing water and wastewater service to the Polo Barn, including potable water and water used by fire hydrants would not be disrupted.

Demolition materials would be recycled or salvaged in accordance with the applicable of construction and demolition regulations, County Code of Regulatory Ordinances Section 68.508-68.518

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Significant impacts were identified for the project and include impacts in the areas of biological resources, cultural (historical) resources, and hazards and hazardous materials. Table S.2-1 provides a summary of all project and cumulative impacts, and identifies mitigation measures to reduce the impacts.

Impacts related to biological resources include potential impacts to the following resources: 1) sensitive or special status bats; and 2) raptors. Mitigation measures are identified to reduce these potential impacts to below a level of significance.

Impacts related to hazards and hazardous materials were identified due to demolition of buildings that contain asbestos-containing materials and lead-based paints. Mitigation measures are identified to reduce these potential impacts to below a level of significance.

Impacts to historical resources were also identified for the project due to the demolition of 26 historical buildings. Mitigation measures were identified; however, even with incorporation of all listed mitigation measures, impacts to historic resources would remain significant and unmitigated.

S.3 Areas of Controversy

A Notice or Preparation (NOP) for the project was circulated on December 4, 2007 for a 30-day review period. The following agencies and interested organizations submitted comment letters in response to the NOP:

- Native American Heritage Commission,
- California Department of Transportation,
- City of Santee, and
- San Diego County Archaeological Society.

Issues raised in these letters included:

Comment Letter Issue Area	Where Addressed in the EIR or Initial Study
Cultural Resources	See Section 2.2 of the EIR
Construction activities that may affect operation of Gillespie Field	See Section VII of the Initial Study
Aesthetics	See I of the Initial Study
Air Quality	See Section III of the Initial Study
Biological Resources	See Section 2.1 of the EIR

Comment Letter Issue Area	Where Addressed in the EIR or Initial Study
Geology and Soils	See Section VI of the Initial Study
Hazards and Hazardous Materials	See Section 2.3 of the EIR
Hydrology and Water quality	See Section VIII of the Initial Study
Noise	See Section XI of the Initial Study
Population and Housing	See Section XII of the Initial Study
Transportation and Traffic	See Section XV of the Initial Study
Utilities and Service Systems	See Section XVI of the Initial Study
Climate Change	See Section 3.1.1 of the EIR

All NOP comment letters are included in Appendix A of the Environmental Impact Report (EIR). All issues raised in these comment letters have been addressed in this Draft EIR. In addition, where applicable, the Initial Study was revised based on comments received. No substantial changes or new impacts were identified, so recirculation of the Initial Study and NOP is not necessary. Minor changes to the Initial Study are identified in the attached document in strikeout/underline format (Appendix A).

In response to the issue raised regarding climate change by the City of Santee, and in the absence of a specific section in either the Initial Study or EIR in which to discuss this issue, a brief discussion follows.

S.4 Issued to be Resolved by the Decision-Making Body

The following issues are to be resolved by the decision-making body:

- Determine if proposed project or any of the project alternatives should be adopted.
- Determine if mitigation measures adequately address impacts to biological resources.
- Determine if mitigation measures adequately address impacts to hazards and hazardous materials.
- Determine if there are adequate considerations to override the significant impact to historical resources.

S.5 Project Alternatives

The Draft EIR analyzed three alternatives to the proposed project. These include the No Project Alternative (no reuse and reuse scenarios), the Reduced Project/Adaptive Reuse Alternative (public and private uses), and the Relocation/Adaptive Reuse Alternative (public and private uses). Alternatives were selected for their ability to meet the project objectives and reduce environmental impacts. Table S.5-1 provides a comparison table for the impact associated with each of the alternatives compared to the project.

Alternatives were considered based upon the impact identified for the project, as well as the objectives of the project. The project objectives are to:

- Carry out the purpose and intent of Board Policy G-15, which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost.

- Eliminate risks of liability, particularly with regard to fire.
- Carry out the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.
- Reduce maintenance costs to the County of San Diego for unoccupied buildings.

See Section 4.0 for a complete discussion of the alternatives.

S.5.1 No Project- No Reuse Alternative

Under the No Project – No Reuse Alternative, the on-site structures would not be demolished and the County would construct a fence surrounding the property to discourage unauthorized trespass onto the property and vacant structures. Under this alternative, the existing conditions for each environmental issue as described in Section 2 of the EIR would remain. Potential environmental impacts associated with both conditions of the No Project-No Reuse Alternative are further discussed below.

Biological Resources

The No Project – No Reuse alternative would not demolish any on-site structure; therefore, there would be no potential to impact sensitive biological resources such as smooth tarplant or raptors. Therefore, impacts would be less than under the proposed project.

Cultural Resources

Under the No Project – No Reuse Alternative, the historical resources identified on-site would not be impacted, since the on-site structures would not be demolished. Compared to the proposed project, this alternative would decrease the overall level of impacts to cultural resources and would eliminate the significant and unmitigated impact identified for the project.

Hazards and Hazardous Materials

No demolition would take place under the No Project – No Reuse Alternative; therefore, existing hazardous materials located on-site, such as asbestos-containing materials (ACM) or lead-based paint (LBP), would not be disturbed due to these activities. These materials would remain in their present condition and they would not pose a threat to individuals in the area through routine transport, storage, use, or disposal. However, unoccupied buildings could create the hazard of an attractive nuisance for trespassers. Foreseeable events occurring as a result of unauthorized entry to unoccupied buildings could include personal injury, property damage, fire, and vandalism. If the buildings are abandoned and no longer maintained, the risk of exposure to ACM or LBP would be difficult to be monitored and the unknowing public could accidentally be exposed to these substances. Therefore, hazards and hazardous material impacts for the No Project Alternative could result in an increased impact compared to the proposed project.

Transportation and Traffic

The No Project – No Reuse alternative would result in similar impacts to transportation and traffic as the proposed project, since no tenants or other uses would be located on-site.

Objectives

Assuming all current patients and staff at the Edgemoor Geriatric Hospital are relocated to the new Skilled Nursing Facility, if the No Project – No Reuse alternative is implemented, the on-site buildings would remain unoccupied and the No Project – No Reuse alternative would not meet any of the identified project objectives. Specifically, it would not carry out the purpose and intent of Board Policy G-15which seeks to maintain safe, functional, and aesthetically pleasing public property at a reasonable cost. This alternative would not eliminate risks of liability, particularly with regard to fire. It would not carry out the purpose and intent of Board Policy F-38, which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. Nor would it reduce maintenance costs to the County of San Diego for unoccupied buildings.

S.5.2 No Project-Reuse Alternative

Under the No Project – Reuse Alternative, the on-site structures would not be demolished and would instead be reused with minimal rehabilitation activities. Although substantial rehabilitation would not occur under the No Project – Reuse Alternative, reuse of the structures would require modifications to meet current applicable California Building Code (CBC), California Historical Building Code (CHBC), and Americans with Disabilities Act (ADA) codes. All upgrades would be required to be consistent with all applicable historic standards, including the Secretary of the Interior's Standards for Rehabilitation. Under this alternative, the existing conditions for each environmental issue as described in Section 2 of the EIR would remain. Potential environmental impacts associated with both conditions of the No Project-Reuse Alternative are further discussed below.

Biological Resources

Under the No Project – Reuse alternative occur, activities associated with bringing all on-site structures up to code could potentially impact sensitive bats located within Building 12 if it was reused. Impacts would be substantially similar to those identified for the proposed project as related to bats if reuse of the on-site structures is proposed.

Cultural Resources

The No Project – Reuse alternative would require updating on-site structures to meet current CBC, CHBC, and ADA codes. The rehabilitation would be completed consistent with the Secretary of the Interior's Standards for Rehabilitation. Compared to the proposed project, the No Project-Reuse Alternative would decrease the overall level of impacts to cultural resources as it would retain the structures on the site. This would eliminate the significant and unmitigated impact identified for the project.

Hazards and Hazardous Materials

Under the No Project – Reuse alternative is implementation of required CBC, CHBC, and ADA upgrades has the potential to disturb on-site ACM or LBP. This represents a significant, but mitigable impact, which is a similar level of impact as the proposed project.

Transportation and Traffic

Implementation of the No Project – Reuse Alternative would generate increased transportation and traffic impacts, as new tenants would be located on-site. If the project site is developed according the City of Santee Town Center Specific Plan and subsequent Riverview Amendment, the project site could be developed as a combination of institutional, office, research or financial institution type uses. Trip generation for the institutional uses would depend on the type of institutional use that was developed. According to traffic generation rates included in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* prepared by the San Diego Association of Governments trip generation could range anywhere from 120/acre for a two-year college/technical school to 300/acre for low-rise office. Therefore, traffic generation under the reuse alternative would be greater than the proposed project, as the proposed project does not propose any new uses. If this alternative is selected, supplemental environmental review would be necessary.

Objectives

Assuming all current patients and staff at the Edgemoor Geriatric Hospital are relocated to the new Skilled Nursing Facility, if the buildings were reused for public uses under the No Project – Reuse alternative, the buildings would be required to be rehabilitated to current CBC, CHBC, and ADA codes. Maintenance activities would continue, thereby eliminating a public health and safety hazard associated with ACM and LBP. Furthermore, the No Project – Reuse alternative would eliminate an attractive nuisance, since the structures would be occupied, thereby meeting the majority of the purpose and intent of Board Policy G-15which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost. This alternative would minimize the risks of liability, particularly with regard to vandalism and fire, as the buildings would be occupied and not at risk for arson from trespassers. This alternative would not meet the purpose and intent of Board Policy F-38, which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. Due to the costs associated with rehabilitating the various structures (ranges from $2 million to $5 million) it would not maximize revenue.

S.5.3 Reduced Project/Adaptive Reuse Alternative

The Reduced Project/Adaptive Reuse Alternative would demolish 15 buildings and foundations (Buildings 1, 5, 11, 13, 16-17, and 19-27), and remove concrete walkways, curbs, and walls; site lighting around buildings; and landscaping near buildings (with the exception of the oak trees) that is incidental to building demolition. None of these buildings were included in the listing of the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district on the California Register of Historical Resources (California Register) in 1987. Buildings 2-4, 6-9, 12, 14-15, and 18 would be retained and rehabilitated. Once rehabilitated, the buildings would be available for either public or private reuse.

Similar to the proposed project, underground irrigation, piping, plumbing, and electrical systems for all buildings demolished would be properly capped and plugged below grade. Underground irrigation, piping, plumbing, and electrical systems for all buildings not demolished would be retained.

Biological Resources

The demolition of 15 on-site structures and extensive rehabilitation activities associated with bringing 11 buildings up to code may potentially impact sensitive bats associated with Building 12. In addition, similar to the proposed project, these activities could impact raptors if demolition activities were to

encroach into areas supporting smooth tarplant or disturbance occurred within 300 feet of an occupied nest during the raptor nesting season. Mitigation identical to that identified for the proposed project would be required to reduce potential impacts to these resources to less than significant levels through avoidance (e.g., sighting staging areas away from smooth tarplant and pre-demolition bat and nesting bird surveys). When compared to the project, this alternative would be substantially similar to those identified for the proposed project as related to smooth tarplant, raptors, and bats.

Cultural Resources

Implementation of the Reduced Project/Adaptive Reuse Alternative would not substantially impact any of the structures officially included on the National or California Register or any of the structures identified as important contributors to the Dairy and Polo Pony Farm-era historic district. However, a majority of the buildings comprising the potential Geriatric Hospital-era historic district would be demolished. In addition, three of the 15 buildings that comprise the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district would also be demolished under this alternative.[4] As identified in Section 2.2, Cultural Resources, Buildings 1, 13, 16, 17, and 21-25 are components of a potential Geriatric Hospital-era historic district. Building 20 (the microfilm storage bunker) would also be demolished under this alternative, but this structure has no to low historical significance. The buildings comprising the potential Geriatric Hospital-era historic district are eligible for state listing under Criterion A for representing a pattern in the development of publicly-funded nursing and rehabilitation care and ultimately the facility's transition to a pioneering institution in the field of geriatrics and Criterion C for associated architectural designs based on current concepts of Modern Architecture. The buildings comprising the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district are eligible for listing under a combination of Criterion A for their association with the establishment and development of pre-New Deal concepts of social welfare and institutions for the care and treatment of the dependent poor in California, Criterion B for their association with Walter Dupee, and Criterion C for embodying the distinctive characteristics of a type, period, and method of construction and for representing the work of recognized Master Architects. Compared to the project, this alternative would result in fewer impacts to cultural resources than the proposed project. However, similar to the proposed project, impacts to the 15 historical buildings would remain significant and unmitigated.

Hazards and Hazardous Materials

Hazards and hazardous material impacts resulting from implementation of the Reduced Project/Adaptive Reuse Alternative would be identical to those resulting from the proposed project. ACM or LBP may be present on-site due to the age of the structures that would be demolished and reused, requiring mitigation for potential impacts resulting from disturbance of these materials. Similar to the proposed project, this mitigation would reduce impacts to hazards and hazardous materials to below a level of significance. Therefore, impacts to hazards and hazardous materials resulting from implementation of the Reduced Project/Adaptive Reuse Alternative would be mitigated to below a level of significance. Compared to the proposed project, implementation of this alternative would result in similar significant and mitigable impact for this environmental issue issue.

[4] It should be noted that the three Poor Farm-era buildings that would be impacted under this alternative (Buildings 19, 26, and 27) were not officially listed on the California Register; however, they were deemed eligible contributors to the district (See Section 2.2 and Appendix C).

Transportation and Traffic

Implementation of the Reduced Project/Adaptive Reuse alternative would generate increased transportation and traffic impacts, as new tenants would be located on-site. If the project site is developed according the City of Santee Town Center Specific Plan and subsequent Riverview Amendment, the project site could be developed as a combination of institutional, office, research or financial institution type uses. Trip generation for the institutional uses would depend on the type of institutional use that was developed. According to traffic generation rates included in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* prepared by the San Diego Association of Governments trip generation could range anywhere from 120/acre for a two-year college/technical school to 300/acre for low-rise office. Therefore, traffic generation under the reuse alternative would be greater than the proposed project, as the proposed project does not propose any new uses. If this alternative is selected, supplemental environmental review would be necessary.

Objectives

Reuse of some of the on-site structures for public or private use would require rehabilitating the buildings up to current CBC, CHBC, and ADA codes. Maintenance activities would continue, thereby eliminating a public health and safety hazard associated with ACM and LBP. Furthermore, reuse of the buildings would eliminate an attractive nuisance, since the structures would be occupied. Although reuse of the on-site structures would require the County to pay maintenance costs for the buildings; the buildings would be occupied. In addition, maintenance costs would be reduced, as some of the on-site structures would be proposed for demolition under the Reduced Project/Adaptive Reuse Alternative. Therefore, this alternative would generally carry out the purpose and intent of Board Policy G-15 which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost. It would also minimize the risk of liability, particularly with regard to vandalism and fire and reduce the maintenance costs to the County of San Diego for unoccupied buildings.

This alternative would not meet the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. The building and structural assessment prepared by Matalon Architecture & Planning (May 2008) determined the structural integrity of the on-site structures and provided a base cost estimate for the rehabilitation of the structures that was applied to determine financial feasibility. A Financial Feasibility Analysis prepared by Keyser Marston Associates, Inc. (May 2008) determined the feasibility of specialty retail, office, or research and development uses as potential tenants of the rehabilitated buildings. It was determined that the costs of rehabilitation outweigh the potential rent revenue by approximately $25 million for general commercial use. For specialty retail uses, the costs of rehabilitation outweigh the potential rent revenue by approximately $22.5 million. Therefore, the costs of rehabilitation far exceed the revenue generated from the buildings if they were to be reused and this alternative would not meet the project objective of ensuring a positive financial return to support the new skilled nursing facility.

S.5.4 Relocation/Adaptive Reuse Alternative

This alternative would move Buildings 2, 3, 6, 14, and 15 to an on-site location surrounding the Polo Barn. Buildings 7-9 and 12 would remain in place, as they are currently located adjacent to the Polo Barn. All other on-site structures would be demolished. Once the buildings are relocated, rehabilitation of the structures would be required and would occur in accordance with the Secretary of the Interior's Standards for Rehabilitation. Adaptive reuse of the relocated structures for public or private use may also

occur under this alternative, at which point the buildings would need to be updated to meet current applicable CBC, CHBC, and ADA codes.

Biological Resources

The relocation of five structures, rehabilitation of nine structures, and demolition of 17 on-site structures has the potential to impact sensitive bats located within the structures or raptors nesting in the on-site trees or buildings. Therefore, mitigation similar to that identified for the proposed project (e.g., performing pre-demolition bat and nesting bird surveys) would be required to reduce potential impacts to less than significant levels. Additionally, demolition activities and relocation of the structures may encroach on surrounding habitat, potentially impacting smooth tarplant. Mitigation would need to be incorporated to avoid impacts to smooth tarplant (e.g., sighting staging areas away from smooth tarplant) and ensure the buildings would not be relocated to an area containing this resource. When compared to the project, this alternative would have a similar level of impact to biological resources including smooth tarplant, raptors, and bats.

Cultural Resources

Under the Relocation/Adaptive Reuse Alternative, Buildings 2, 3, 6, 14, and 15 would be relocated to an on-site location surrounding the Polo Barn and rehabilitated. Buildings 7-9 and 12 would remain in place and would be rehabilitated. While the on-site buildings would be relocated and structurally preserved, according to the United States Department of the Interior, "the relationship between a property and its historic associations is destroyed if the property is moved" (DOI, 1990). However, since the buildings would be relocated within the same general property, relocation as proposed under this alternative is not considered to significantly diminish the integrity of the buildings. However, demolition of Buildings 1, 4-5, 11, 13, and 16-27 would result in significant impacts. Therefore, mitigation similar to that identified for the proposed project would be required to be incorporated (e.g., preparation of Historical American Building Survey (HABS) documentation, an historic interpretive site model, and an historic interpretive display). However, even with the incorporation of mitigation, impacts to those structures comprising the Dairy and Polo Pony Farm, Edgemoor Farm San Diego County Home for the Aged and Indigent-era, and Geriatric Hospital era historic districts would remain significant and unmitigated.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts resulting from implementation of the Relocation/Adaptive Reuse Alternative would be similar to those resulting from the proposed project. Due to the age of the structures that would be relocated (ranging from 1913 to 1926), adoption of the Relocation/Adaptive Reuse Alternative would require mitigation for potential impacts resulting from disturbance of ACM or LBP (e.g., ACM and LBP surveys and, if appropriate, ACM and LBP removal). In addition, mitigation measures would need to be incorporated to reduce impacts associated with ACM or LBP during demolition activities to below a level of significance. Compared to the proposed project, implementation of this alternative would result in similar impacts for this environmental issue area.

Transportation and Traffic

Depending on the ultimate uses under this alternative, traffic generation could be similar to that being generated currently to substantially more. For example office or commercial uses are likely to have greater trip generation compared to residential uses. If this alternative is selected, additional environmental review would be necessary.

Objectives

Relocation and reuse of some of the on-site structures would require rehabilitating the buildings up to current CBC, CHBC, and ADA codes. Maintenance activities would continue, thereby eliminating a public health and safety hazard associated with ACM and LBP. Furthermore, reuse of the buildings would eliminate an attractive nuisance, since the structures would be occupied. Although reuse of the on-site structures would require the County to pay maintenance costs for the buildings; the buildings would be occupied. In addition, maintenance costs would be reduced, as some of the on-site structures would be proposed for demolition under the Reduced Project/Adaptive Reuse Alternative. Therefore, this alternative would generally carry out the purpose and intent of Board Policy G-15 which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost. It would also minimize the risk of liability, particularly with regard to vandalism and fire and reduce the maintenance costs to the County of San Diego for unoccupied buildings.

This alternative would not meet the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. The building and structural assessment prepared by Matalon Architecture & Planning (May 2008) determined the structural integrity of the on-site structures and provided a base cost estimate for the rehabilitation of the structures that was applied to determine financial feasibility. A Financial Feasibility Analysis prepared by Keyser Marston Associates, Inc. (May 2008) determined the feasibility of specialty retail, office, or research and development uses as potential tenants of the rehabilitated buildings. It was determined that the cost of rehabilitation would outweigh the potential rent revenue by approximately $17.7 million for the new office/research and development uses (in addition to the adaptively reusing the relocated structures for specialty retail uses). The cost of rehabilitation of the site for a mixed use development (in addition to adaptively reusing the relocated structures was estimated to outweigh the potential rent revenue by $17 million. Therefore, the costs of rehabilitation far exceeds the revenue generated from the buildings if they were to be reused and this alternative would not carry out the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.

Table S.1-1. On-Site Structures

Building Number	Historic Use[1]	Contemporary Use[2]
1	Administration Building	Administration Building
2	Women's Ward	Offices, Pharmacy, Conference Room, Storage
3	Dining and Recreation Hall	Mess Hall, Housekeeping, Laundry
4	Unknown	Auxiliary Buildings/Library, Linen, Public Lounge
5	Men's Ambulatory Ward	Building Fragment
6	Men's Ward	Wheelchair repair, patient storage, thrift store
7	Dairy Barn/Men's Ambulatory Ward	Vacant
8	Dairy Barn/Men's Ambulatory Ward	Vacant
9	Dairy Barn/Men's Ambulatory Ward	Santee Food Bank
10[3]	Polo Barn	Barn, Storage
11	There was no historic use for this structure.	Connecting Corridor
12	Unknown	Garden Shop, Vehicle Garage, Gardener's Office
13	Rehabilitation Building/Semi-Ambulatory Building	Rehabilitation
14	Workshop	Engineering, Carpentry and Paint Shops, Carpenter's Shop
15	Boiler Plant, Building Maintenance and Engineering	Boiler Plant, Building Maintenance and Engineering
16	Dietary, Dining Room and Kitchen	Dietary, Dining Room and Kitchen
17	Santa Maria Building	Santa Maria Building
18	Enclosed Ward, Psychiatric Ward, Custodial Wards, Men and Women	Custodial Wards
19	Enclosed Ward, Psychiatric Ward, Custodial Ward, Men and Women	Custodial Wards
20	Microfilm Library, Bunker	Vacant
21	Employee Apartments	Vacant
22	Employee Apartments	Vacant
23	Employee Apartments	Vacant
24	Employee Apartments	Vacant
25	Employee Laundry	Vacant
26	Employee Gas Station[4]	Vacant
27	Water Storage Tank and Pump House	Water Storage Tank and Pump House
N/A	Breezeways	Breezeways

Notes: [1] Historic usage refers to the original use of the structures.
[2] Contemporary usage refers to subsequent uses of the structures.
[3] The Polo Barn would be retained on-site.
[4] The underground diesel storage tanks were removed in October and November 1998, at which point the gas station was no longer in service (see Section VII, Hazards and Hazardous Materials, of the Initial Study included as Appendix A to this EIR).

Table S.2-1. Summary of Project Impacts and Proposed Mitigation Measures

Impact Number	Project Impact	Proposed Mitigation	Conclusion and Mitigation Effectiveness
SIGNIFICANT IMPACTS MITIGATED TO BELOW A LEVEL OF LESS THAN SIGNIFICANT			
Biological Resources (See Section 2.1)			
Impact BIO-1	Potential impacts to sensitive or special status bats	MM BIO-1 A pre-demolition clearance survey for sensitive bats shall be conducted prior to the demolition of Building 12. Surveys shall be conducted within one week prior to building demolition. Should any bats be found inhabiting the building, demolition shall be avoided from March through August in order to avoid impacts to pregnant females or young incapable of flying. Bats found inhabiting a maternity colony after August shall be allowed to exit the roost and prevented from reentering.. Demolition will not occur until all bats have departed.	Implementation of MM BIO-1 would reduce direct impacts to less than significant levels by avoiding impacts to pregnant females or young.
Impact BIO-2	Potential impacts to raptors	MM BIO-2 In accordance with the Migratory Bird Treaty Act, potential nesting vegetation (i.e., trees, shrubs, ground cover, etc.) and buildings supporting raptors shall be avoided during the nesting season, recognized from February 15 through August 31. Should demolition occur between these dates, a qualified biologist shall conduct a survey no more than three days prior to demolition activity to identify any active nests. If active nests are identified during the surveys, then the nesting vegetation or buildings shall be avoided until the nesting event has completed and the juveniles can survive independently from the nest. The biologist shall flag the areas that are considered to support sensitive raptors and establish a 500 foot buffer (e.g., exclusionary flagging/fencing) around these areas, consistent with the San Diego County Multiple Species Conservation Program (MSCP). Demolition activities shall not occur within the buffer until the nesting event has been completed.	Potential direct impacts to nesting raptors would be reduced through implementation of MM BIO-2, which provide a sufficient buffer around occupied nests, ensuring direct impacts to these species would not occur.

Impact Number	Project Impact	Proposed Mitigation	Conclusion and Mitigation Effectiveness
Hazards and Hazardous Materials (Section 2.3)			
Impact HAZ-1	ACM found in the on-site structures would be disturbed during demolition	MM HAZ-1 Prior to any demolition, renovation, or any other activity that may disturb known or potential ACM, either an inspection shall be performed by the Department of Environmental Health (DEH), Occupational Health Program (OHP), or the affected materials shall be handled as asbestos-containing in accordance with all federal and state requirements, including the County of San Diego Administrative Manual Asbestos Policy 0050-01-9. If future sampling identifies any such materials as ACM, they shall be properly abated and disposed of by a state-licensed abatement contactor prior to disturbance or demolition in accordance with all federal and state requirements. In addition, the Air Pollution Control District (APCD) and Cal/OSHA have notification requirements pertaining to the disturbance of ACM. When applicable, these notifications must be made prior to the activity as follows: • Ten day notification to APCD for renovation/demolition activities. • 24-hour notification of Cal/OSHA.	Through implementation of MM HAZ-1, all affected materials shall be properly abated and disposed of by a state-licensed abatement contractor prior to disturbance or demolition. Implementation of this mitigation measure would reduce potential impacts due to ACM to below a level of significance.
Impact HAZ-2	LBP found in the on-site structures would be disturbed during demolition	MM HAZ-2 Prior to any activity that may cause lead exposure to workers, LBP sampling shall be performed in accordance with all federal and state requirements. Should future demolition disturb any suspect paint, a LBP inspection or risk assessment shall be conducted by a state or federally certified LBP inspector/assessor to identify areas of potential worker exposure in accordance with all federal and state requirements, including Title 17, CCR Section 35005. Should any LBP be identified, such painted surfaces shall be included in an approved interim controls (Operations and Maintenance) program and disposed of by a state-licensed abatement contractor.	Implementation of MM HAZ-2 would reduce potential impacts resulting from exposure to LBP to below a level of significance because it would ensure that any risks associated with LBP disturbance are properly handled by a federally or state certified LBP inspector/assessor in accordance with all federal and state requirements. Implementation of this mitigation measure would reduce potential impacts due to LBP to below a level of significance.

<table>
<tr><th>Impact Number</th><th>Project Impact</th><th>Proposed Mitigation</th><th>Conclusion and Mitigation Effectiveness</th></tr>
<tr><td colspan="4">SIGNIFICANT IMPACTS NOT MITIGATED TO BELOW A LEVEL OF LESS THAN SIGNIFICANT</td></tr>
<tr><td colspan="4">Cultural Resources (See Section 2.2)</td></tr>
<tr><td>Impact CR-1</td><td>Impacts to historic resources</td><td>MM CR-1
The project applicant shall prepare appropriate level Historical American Building Survey (HABS) documentation in accordance with the National Park Service's Historic American Building Survey Guidelines for Preparing Written and Historical Descriptive Data as identified below:
<table>
<tr><th>Building Number</th><th>HABS Level</th></tr>
<tr><td>1</td><td>III (Architectural Significance; District Contributor)</td></tr>
<tr><td>2</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>3</td><td>II (Historical and Architectural Significance; District Contributor erroneously left off original list)</td></tr>
<tr><td>4</td><td>II (Historical Significance; District Contributor)</td></tr>
<tr><td>5</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>6</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>7</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>8</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>9</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>10</td><td>Not required; demolition of this structure would not occur</td></tr>
<tr><td>11</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>12</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>13</td><td>III (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>14</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>15</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>16</td><td>III (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>17</td><td>III (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>18</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>19</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>20</td><td>IV (District Contributor))</td></tr>
<tr><td>21</td><td>IV (District Contributor))</td></tr>
</table></td><td>Impacts would be reduced with implementation of MM CR-1, which identifies the appropriate HABS documentation for each on-site structure. The appropriate level of HABS documentation is based on the amount and type of material available relating to each structure, as well as their significance and integrity. Additionally, implementation of mitigation measure MM CR-2, which requires preparation of an interpretive site model depicting the various on-site structures and uses as they appeared during the interpretive period would further reduce impacts to these resources. Implementation of mitigation measure MM CR-3, which requires preparation of an historic interpretive display about the history of the project site and surrounding landscape as well as the salvage of historic artifacts or building features would convey a sense of history at the project site, further reducing impacts to these resources. However, even with implementation of these mitigation measures impacts to historical resources would remain significant. Therefore, a Statement of Findings and Overriding Considerations would be required pursuant to CEQA Guidelines Sections</td></tr>
</table>

<table>
<tr><th>Impact Number</th><th>Project Impact</th><th>Proposed Mitigation</th><th>Conclusion and Mitigation Effectiveness</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th>Building Number</th><th>HABS Level</th></tr>
<tr><td>22</td><td>IV (District Contributor))</td></tr>
<tr><td>23</td><td>IV (District Contributor))</td></tr>
<tr><td>24</td><td>IV (District Contributor))</td></tr>
<tr><td>25</td><td>IV (District Contributor))</td></tr>
<tr><td>26</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>27</td><td>II (Historical and Architectural Significance; District Contributor)</td></tr>
<tr><td>Breezeways</td><td>IV (District Contributor))</td></tr>
</table>
Note: Buildings requiring HABS Level IV documentation exhibit moderate to no significance in and of themselves; however, HABS documentation would still be required due to the buildings' contribution to the overall context of the site.

MM CR-2
An historic interpretive site model shall be prepared including buildings constructed prior to the 1960s. Interpretive information, such as light-up coded information showing the different phases of use, shall be included. The interpretive model shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the interpretive model shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board

An historic interpretive display shall be prepared and shall include a combination of wall-mounted, pedestal, and table-top displays and interactive activities. Information presented in the interpretive display shall include, but is not limited to: a site model, a historic description of the various uses of the project site and surrounding landscape, enlarged historic photographs, excerpts from oral interviews, a documentary film running on a monitor when activated by a visitor, or representative salvaged artifacts from the demolished buildings. The documentary film shall include site footage, interviews with current and former staff and patients, music, titles/captions, and historic photographs.</td><td>15091 and 15093.</td></tr>
</table>

Impact Number	Project Impact	Proposed Mitigation	Conclusion and Mitigation Effectiveness
		The interpretive display shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the interpretive display shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board.	

Table S.5-1. Comparison of Project Alternative Impacts to Proposed Project Impacts

Alternative	Buildings to be Retained and Rehabilitated	Buildings to be Relocated and Rehabilitated	Buildings to be Demolished	Issue Area			
				Biological Resources	Cultural Resources	Hazards and Hazardous Materials	Transportation and Traffic
Proposed Project	N/A	N/A	All on-site structures with the exception of Building 10 (Polo Barn)	Mitigated to below a level of significance	Significant and unmitigated	Mitigated to below a level of significance	No significant impact
No Project (No Reuse)	N/A	N/A	N/A	Less impactive than proposed project; no significant impact	Less impactive than proposed project; no significant impact	Greater impact than proposed project; mitigated to below a level of significance	Less impactive than proposed project; no significant impact
No Project (Reuse)	N/A*	N/A	N/A	Similar impact as proposed project; mitigated to below a level of significance	Less impactive than proposed project; less than significant impact	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review
Reduced Project/ Adaptive Reuse (public and private uses)	2, 3, 4, 6, 7, 8, 9, 12, 14, 15, and 18	N/A	1, 5, 11, 13, 16, 17, 19, 20, 21, 22, 23, 24, 25, 26, and 27	Similar impact as proposed project; mitigated to below a level of significance	Less impactive than proposed project; significant and unmitigated	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review

Alternative	Buildings to be Retained and Rehabilitated	Buildings to be Relocated and Rehabilitated	Buildings to be Demolished	Issue Area			
				Biological Resources	Cultural Resources	Hazards and Hazardous Materials	Transportation and Traffic
Relocation/ Adaptive Reuse (public and private uses)	7, 8, 9, and 12	2, 3, 6, 14, and 15	1, 4, 5, 11, 13, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, and 27	Similar impact as proposed project; mitigated to below a level of significance	Similar impact as proposed project; significant and unmitigated	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review

Note: * It should be recognized that all on-site structures are proposed for retention and upgrading under the No Project – Reuse Alternative; however, no rehabilitation activities would occur to any on-site structure. Upgrading is characterized as making basic improvements to make the structures habitable. Rehabilitation is characterized as brining the structures up to compliance with CBC, CHBC and ADA requirements.

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1.0 PROJECT DESCRIPTION, LOCATION AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The Edgemoor Facility Demolition project (project) proposes the demolition and removal of 26 buildings within the City of Santee (Table S.1-1).[1] The 26 buildings are currently associated with the Edgemoor Geriatric Hospital, which is owned and operated by the County of San Diego. Since their construction (ranging from 1913 to 1961), most of the buildings have been in continual use. Seven of the buildings have been vacant since the early 1980s. One of the buildings is used by the Santee Food Bank on an interim basis unrelated to the hospital operations[2].

In 2004, the San Diego County Board of Supervisors concluded that the buildings comprising the Edgemoor Geriatric Hospital were obsolete and deteriorating and that it would be more cost effective to build a new hospital than to rehabilitate the old buildings. In addition, the Board of Supervisors adopted Policy F-38 that establishes future development policy for the project site with a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.

The project site is located within the Master Plan Boundary identified in the Santee Town Center Specific Plan Amendment (Specific Plan) and EIR (SCH No. 1999031096), which was approved by City of Santee on February 8, 2006. The Specific Plan serves as the Master Plan for the site as more particularly described in Section 108 of a Development and Disposition Agreement (DDA) between the County of San Diego and Ryan Companies US, Inc. approved by the County's Board of Supervisors on December 9, 2003. The DDA provides Ryan with development rights for the County-owned property south of the San Diego River in Santee located outside of the Sheriff's Department Las Colinas facility. The Master Plan component of the DDA implements the provisions of Board of Supervisors Policy F-38 Edgemoor Property Development that address preparation of a comprehensive master plan for the management and development of the property in consultation and cooperation with the City of Santee.

No development is proposed as part of the project. New development consistent with the City of Santee's General Plan or Town Center Specific Plan could be built on-site in the future. Environmental review has been completed for both the City's General Plan and Town Center Specific Plan. The project does not propose any modifications to any planned land uses that differ from any adopted plan. Furthermore, any future development on the project site would require separate environmental review.

As part of a separate project, a new skilled nursing facility is under construction and is scheduled to be ready for occupancy in late 2008. This new facility will be a 160,000 square foot state-of-the-art skilled nursing complex and will be located northeast of the Polo Barn (Building 10 on Figure 1.2-1). Current patients and staff at the Edgemoor Geriatric Hospital will be transferred to this new facility at that time. Once the patients and staff have transferred, all of the buildings at the current facility would then become unoccupied. Once the new facility is operative, no use for the existing facilities on the project site has been identified. Once the patients and staff are relocated, the unoccupied buildings would pose a public health and safety hazard. Unoccupied structures attract illegal activities.

[1] It should be noted that while there is a total of 27 buildings located on-site, Building 10 (Polo Barn) would be preserved and is not proposed for demolition.

[2] Three of the buildings proposed for removal by the proposed project (#13 Rehabilitation Building, #16 Dietary Building, and #17 Santa Maria building) are also proposed for removal by the Las Colinas Detention Facility (LCDF) project. A separate EIR (SCH# 2006091036) is being prepared for the LCDF project.

Foreseeable events occurring as a result of unauthorized entry to unoccupied buildings could include personal injury, property damage, fire, and vandalism. The buildings would pose a public heath and safety hazard due to the presence of asbestos containing materials (ACM) or lead-based paint (LBP). If the buildings are abandoned and no longer maintained, the risk of exposure to ACM or LBP would be difficult to be monitored and the unknowing public could accidentally be exposed to these substances. Elimination of the risk of danger would be necessary to protect the trespassers from harm, as well as the general public from unauthorized or unlawful activities that could occur at the property.

Additionally, the cost of maintenance of unoccupied buildings is not justified, as the money dedicated to the maintenance of the unoccupied buildings could better be applied to other capital and major maintenance projects.

Therefore, the following objectives were identified for the Edgemoor Facility Demolition:

- Carry out the purpose and intent of Board Policy G-15 while seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost.
- Eliminate risks of liability, particularly with regard to fire.
- Carry out the purpose and intent of Board Policy F-38, which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.
- Reduce maintenance costs to the County of San Diego for unoccupied buildings.

1.2 Project Description

1.2.1 Project's Component Parts

The project consists of demolition and removal of 26 buildings, including the existing Edgemoor Geriatric Hospital and associated structures (Figure 1.2-1). The Polo Barn, which is listed in the National Register of Historic Places and the California Register of Historic Resources (Building 10), would be preserved and maintained on the project site. Table 1.2-1 lists and describes the historical and contemporary uses of each structure located on-site. Seven of the structures (Buildings 20–26) are currently vacant. The occupied structures are currently used on an interim basis as a geriatric hospital and for two non-profit social services. These uses are ending by late 2008 and the buildings will be vacant at that time.

Demolition activities would commence when the new Skilled Nursing Facility is operational and all patients and staff have been transferred to the new facility (late 2008). Construction of the new skilled nursing facility was processed under a Mitigated Negative Declaration and is not included as part of the proposed project. All demolition activities would occur only in previously developed or disturbed areas of the project site. No excavation or grading is proposed in undisturbed natural areas. Generally, the existing landscaping would be left in place except in areas where the removal of vegetation is necessary to demolish the structures (e.g., vegetation located so close to the building that removal of the building damages the vegetation) (Figure 1.2.2).

The proposed project includes demolition and removal of the following:

- Twenty-six buildings and foundations;
- Concrete walkways, curbs, and walls;

- Some site lighting (e.g., around buildings); and
- Landscaping near the buildings (with the exception of the oak trees) that is incidental to building demolition.

It is estimated that demolition and exportation of demolition material would occur over approximately 180 days. The demolition portion is assumed to take up to 120 days and would be limited to 260 cubic yards of material per day. Existing storm drain systems would remain intact. Any unnecessary underground irrigation, piping, plumbing, and electrical systems would be properly capped and plugged below grade. As identified above, some landscaping (e.g., shrubs around buildings) would be removed incidental to demolition; however, all oak trees located on-site would remain.

Once demolition of any structure commences, no unauthorized person would be permitted to enter the construction area. Fencing would be installed surrounding the work area at least a distance equivalent to the height of the building. This buffer would provide an adequate work space to safely demolish the buildings and provide an area for staging equipment and debris. Demolition would be conducted in compliance with the County's Noise Abatement and Control Ordinance. Demolition activities would be limited to between the hours of 7 a.m. and 7 p.m. consistent with the City's Noise Ordinance. Site security would be provided during non-construction hours. Access to the project site for demolition and hauling equipment would be provided via Edgemoor Drive. Existing water and wastewater service to the Polo Barn, including potable water and water used by fire hydrants would not be disrupted.

Demolition materials would be recycled or salvaged in accordance with the applicable of construction and demolition regulations, County Code of Regulatory Ordinances Section 68.508-68.518.

1.2.2 Technical, Economic, Environmental Characteristics

The general conditions of the structures on-site indicate functional and age-related deterioration and deficiencies. A number of structures were constructed before building codes were adopted. Additionally, all on-site structures were built before modern seismic standards were established, as well as standards for access under the Americans with Disabilities Act (ADA). Other building codes, such as the California Building Code (CBC), have been updated multiple times since the buildings' construction. Furthermore, the on-site structures have been identified as historic (see Section 2.2 and Appendix C). Any rehabilitation activities would need to conform to the Secretary of the Interior's Standards for Rehabilitation and California Historical Building Code (CHBC) standards. Therefore, if the on-site structures are intended for long-term use, rehabilitation would require costly structural upgrades and improvements consistent with seismic, ADA, CBC, and CHBC codes.

There are numerous limitations to using these buildings for public or commercial uses, including:

- The layout, size, and condition of the buildings generally do not lend themselves to modern office, commercial, or public uses without significant costly upgrades;
- The County has not identified a suitable current public use for the buildings, nor a long term capital need for the buildings;
- The cost of rehabilitating the structures is substantial[3];

[3] Based upon an Adaptive Reuse Study prepared by Matalon Architecture (2008), rehabilitation of the buildings would range from $2.5 to $5.5 million dollars per building. The rehabilitation cost varies based upon the buildings current condition and the improvements needed to bring it up to current codes.

- The cost of maintaining historic buildings is substantially higher compared to modern buildings[4];
- The County of San Diego Capital Improvements Needs Assessment (CINA) is a county-wide summary of near and long-term (five year time frame) capital improvements/facilities that are needed for various County Departments to enhance or improve their services to the public. No facilities or improvements are funded or planned for the Santee area.

For a private commercial use, the site layout, the building floor plans, building configuration, size, and cost of rehabilitation limits the types of potential tenants (see Section 4.0, Project Alternatives for a more detailed discussion of the potential for adaptive uses of the structures). The County recognized these deficiencies and chose to construct a new skilled nursing facility to support the medical needs of the residents instead of rehabilitating the existing facility.

Board of Supervisors Policy F-38, developed to guide future use of the site, provides for the future planning, development, use, or lease or sale of the Edgemoor property in accordance with the Santee Town Center Specific Plan. The Policy emphasizes a need to maximize revenue generation for the County. The revenues generated from activities at Edgemoor are needed to support the new Skilled Nursing Facility. Revenue generation from activities at the project would come from future uses on the project site. As detailed earlier in this section, there are no new uses proposed at this time.

Project Design Features

The following design features are identified and assumed to be a part of the project:

Air Quality

Standard mitigation requirements and project design considerations listed in Section 5.1 of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Air Quality would be implemented for the project. Implementation of these required measures would reduce PM_{10}, NO_x, and VOC emissions from demolition and debris removal activities.

Demolition and exportation of demolition material would occur over 180 days. The demolition portion is assumed to take up to 120 days and would be limited to a maximum of 260 cubic yards of material per day.

The project would comply with APCD Rule 51 and California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700, which prohibit discharge of any pollutants that would be considered a nuisance or endangers the comfort, health, or safety of any person.

Cultural Resources

In the unlikely event that human remains are encountered, the project would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98(b), which prohibit further disturbance of such remains, as required by State law.

[4] Maintenance of historic structures is more expensive due to the need for more regular or more extensive maintenance. Repair parts for older buildings can be more difficult to acquire, thus adding cost. Additionally, repairs to historic structures must be undertaken with great care as to not damage the integrity of the building.

Geology and Soils/Hydrology and Water Quality

A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented to incorporate site design measures or short- or long-term source of treatment control Best Management Practices (BMPs) in compliance with the both the City of Santee and County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance and both the City's and County's Standard Urban Stormwater Mitigation Plan (SUSMP).

Hazards and Hazardous Materials

All storage, handing, transport, emission, and disposal of hazardous substances would be in full compliance with local, state, and federal regulations.

Noise

The project would comply with the construction noise standards of the San Diego County Code of Regulatory Ordinances. Construction equipment operations would occur only between 7 a.m. and 7 p.m. This is consistent with the City of Santee Noise Ordinance (Chapter 8.12.290 of the City's Municipal Code).

1.3 Project Location

The project site covers approximately 21 acres and is located in San Diego County within the City of Santee (Figure 1.3-1). The County-owned site is approximately five miles northeast of Lake Murray, south of the San Diego River, and northwest of the corner of the intersection of N. Magnolia Avenue and Park Avenue within the City of Santee's Town Center Specific Plan area (Figures 1.3-2 and 1.3-3). Regional access is provided to the site by State Route 67 (SR-67), a north/south freeway that runs between Interstate 8 (I-8) and the community of Ramona, and SR-125, a north/south freeway that runs between I-8 and SR-52. Local access is provided along N. Magnolia Avenue. The project site is north of Mission Gorge Road, and is bounded to the west by Cottonwood Avenue, to the north by Chubb Lane, to the east by N. Magnolia Avenue, and to the south by Park Avenue.

1.4 Environmental Setting

The project site is currently developed with the Edgemoor Geriatric Hospital, related structures, and a community garden. The site is surrounded by the Las Colinas Detention Facility to the west, open space and the San Diego River to the north, multi-family residences to the east, and single family residences to the south.

Topography on the project site and adjacent land is generally flat, with gentle slopes southeast of the project site. The northern 3.26 acres of the project site are located within a 100-year flood hazard area.

For more site specific information, please refer to the Existing Conditions sections for each issue area, including Sections 2.1.1, 2.2.1, and 2.3.1.

1.5 Intended Uses of the EIR

This EIR is a document which will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible way to minimize significant effects, and

describe reasonable alternatives to the project [California Environmental Quality Act (CEQA) Guidelines Section 15121(a)].

The EIR prepared for this project is a project EIR, because the discretionary actions are for site-specific approvals, as compared to a Program or Master Program approval. As indicated under State CEQA Guidelines Section 15161, the analysis for a project EIR shall focus primarily on the changes in the environment that would result from the development within the project area, including planning, construction, and operation.

1.5.1 Matrix of Project Approvals/Permit

The following permit(s) shall be acquired as a condition of approval of the proposed project:

Permit Type/Action	Agency
Demolition Permit Hauling Permit	County of San Diego City of Santee

It is important to note that a County project located in a City generally is not subject to regulation by the City. For example, a City's zoning and building ordinances do not apply to a County project located in the City[5] A City's General Plan does not apply to a County project located in the City[6]. Other City ordinances, even though enacted specifically to regulate a County, have also been found not to apply to a County project located in the City[7].

Consequently, because the proposed project is a County project, it is exempt from the City of Santee's ordinances and General Plan. However, even though Government Codes do not require the County to abide by City Ordinances, the proposed project would be consistent with many of the City's ordinances.

1.5.2 Related Environmental Review and Consultation Requirements

No additional environmental review or consultation requirements have been identified for the project.

1.6 Project Inconsistencies with Applicable Regional and General Plans

Implementation of the proposed project would not conflict with any Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plans, local policies, or ordinances. Although the Multiple Species Conservation Program (MSCP) has a number of subarea plans, the City of Santee has not finalized the approval process for their Subarea Plan. The draft Subarea Plan being prepared by the City of Santee designates this area as urban/developed. Since the project's use and Subarea Plan designation are the same (as of March 2008), the project is consistent with the draft subarea plan.

The project site is generally located within the City of Santee Town Center Specific Plan. Within the Specific Plan, approximately four acres of the project site is identified for commercial/office development within Planning Area E and approximately 16 acres of the project site is also identified for

[5] Government Code Sections 53090 and 53091; and 40 Ops.Cal.Atty.Gen. 243 (1962).
[6] Lawler v. City of Redding, 7 Cal.App.4th 778(1992).
[7] County of Los Angeles v. City of Los Angeles, 212 Cal.App.2d 160 (1963).

commercial/office development within Planning Area J (Figure 1.6-1). The entire Specific Plan area is designated by an office park overlay, which establishes an option for a master planned corporate office park, pursuant to City Council Resolution No. 145-2000. Therefore, demolition of the structures on the project site would not conflict with the Specific Plan.

1.7 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

The CEQA Guidelines define cumulative effects as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." The CEQA Guidelines further state that the individual effects can be the various changes related to a single project or the changes involved in a number of other closely related past, present, and reasonable foreseeable probable future projects (Section 15355).

A list of past, present, and reasonably anticipated future projects in the area considered and evaluated as a part of this EIR is presented in Table 1.7-1. Figure 1.7-1 illustrates the location of these projects. The closest projects are the Las Colinas Detention Facility and the Walgreens II development.

1.8 Growth Inducing Impacts

The proposed project involves the demolition and removal of existing structures and does not propose any new development on the project site. The project does not propose the extension or expansion of any public services or utilities, nor does it propose the extension of roadways. New development consistent with the City's General Plan and Town Center Specific Plan, including potential institutional or residential uses, could be built on-site in the future, but is not proposed at this time.

The removal of the buildings has the potential to make future development easier to construct, as the site would already be cleared. However, this future development has been contemplated in the EIRs prepared for both the Santee General Plan and the Town Center Specific Plan. While the demolition and removal of the buildings has the potential to make the site easier to develop, it would not encourage any development that has not already been considered in the two plans previously mentioned nor result in additional impacts. Future development of the site in accordance with these plans has been evaluated within either the City of Santee General Plan EIR or the Town Center Specific Plan EIR. Future development would be subject to review under these plans and CEQA. Pursuant to CEQA Guidelines Section 15162(a)(2), if any on-site conditions change, new environmental analysis would be required when future development is proposed for the project site. Since the project does not propose new development and does not extend any existing infrastructure, the project is determined to not be growth inducing.

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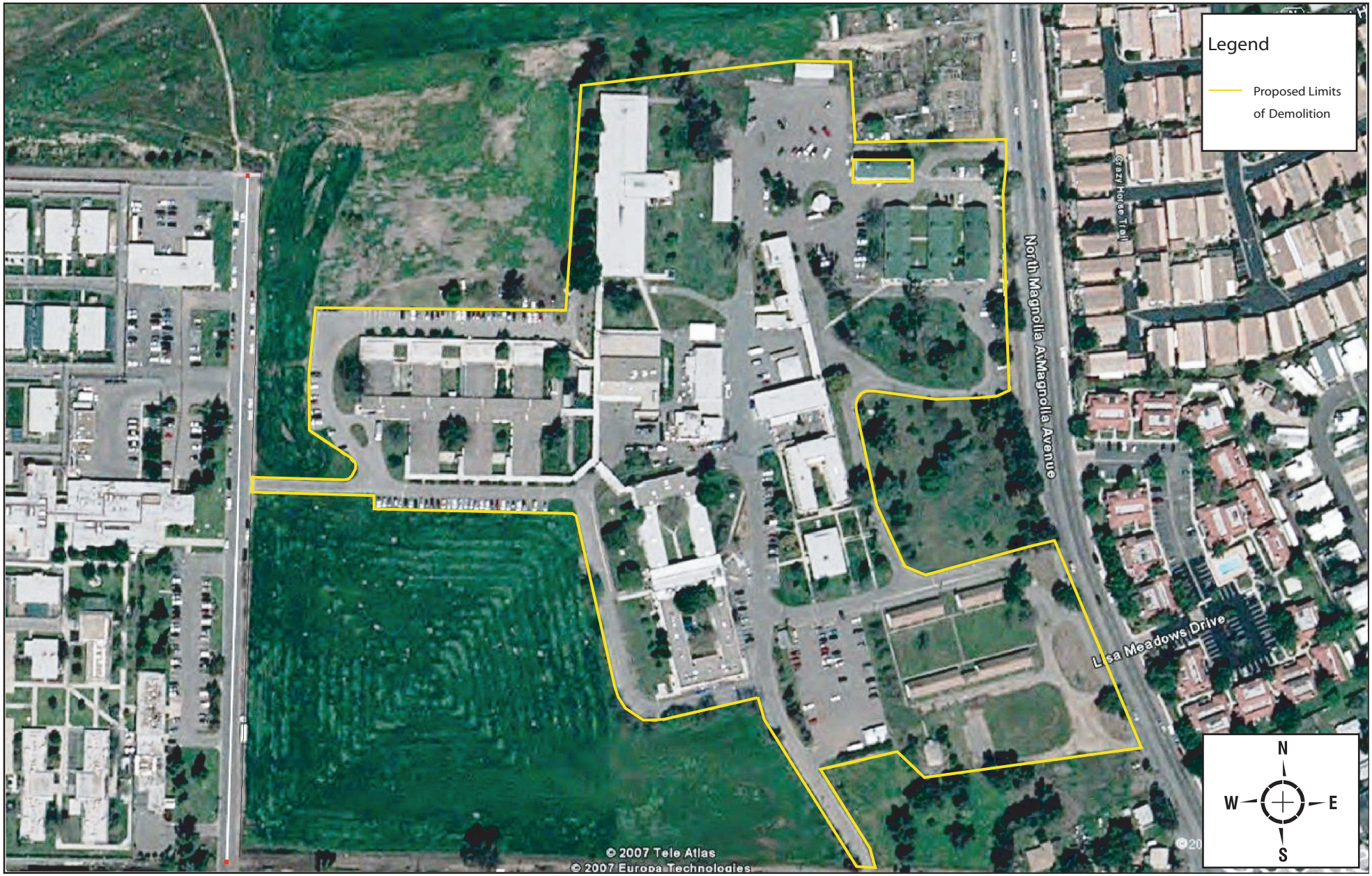
Source: SanGIS; 2006 | G:\Projects\63610_EDGEMOORDEMO\map_docs\mxd\EIR\BuildingLocations.mxd | Last Updated :06-05-08

Building Locations

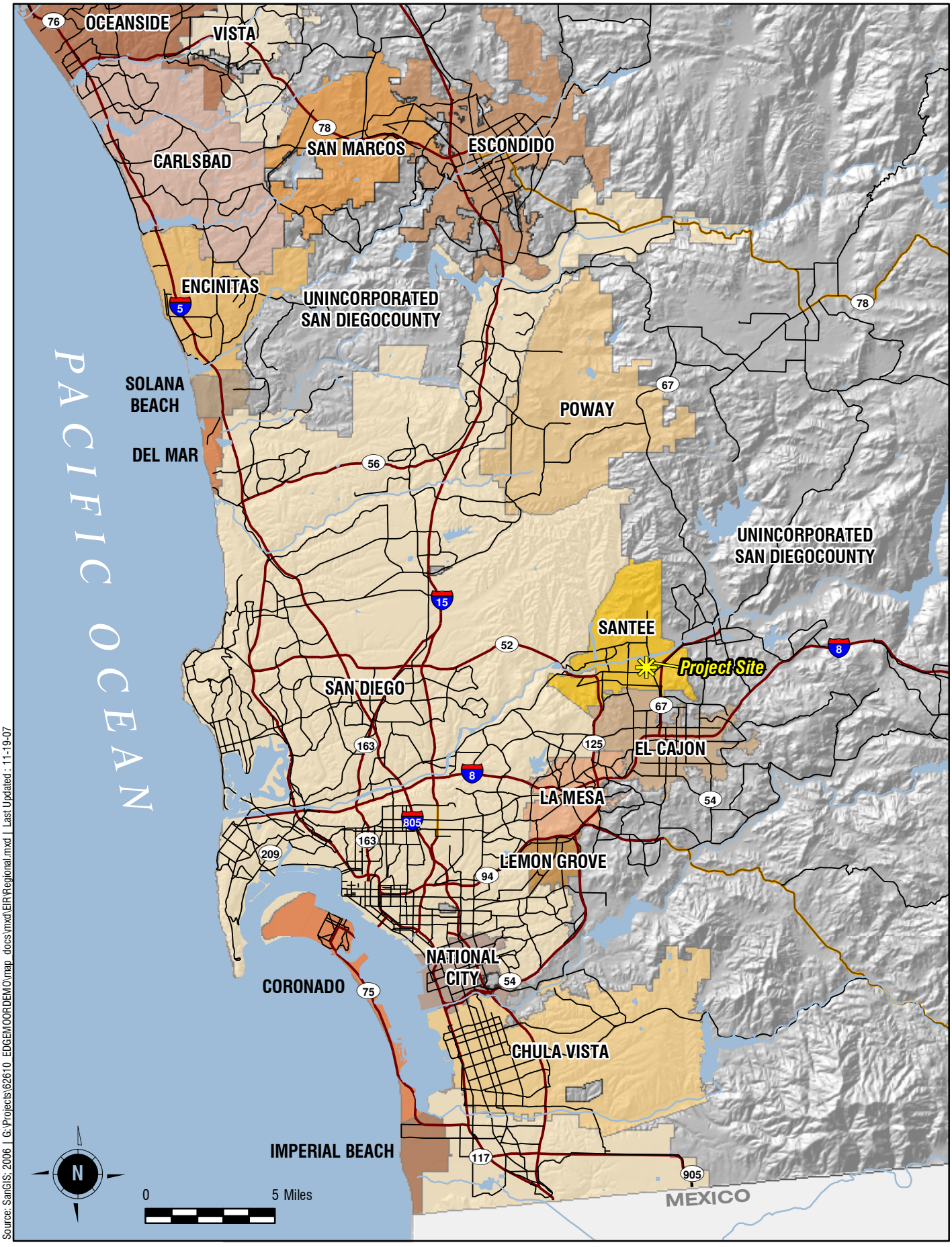
FIGURE 1.2-1

Source: First Source; Google Earth | \\SDG-G:\Projects\63610_EDGEMOORDEMO\graphics\docs\existingconditions.ai | Last Updated : 06-02-08



Limits of Proposed Demolition

FIGURE 1.2-2

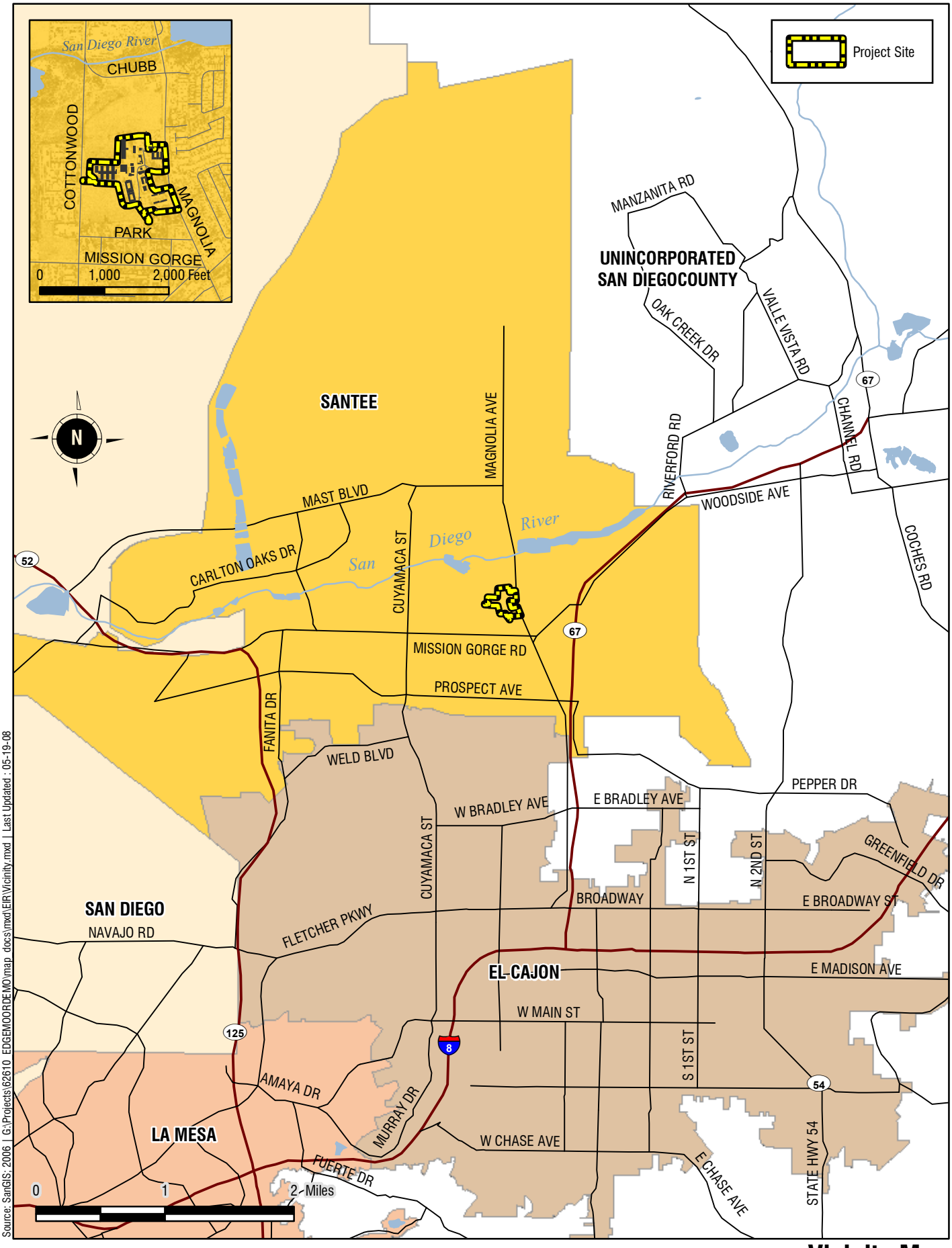


Source: SanGIS; 2006 | G:\Projects\62610 EDGEMOORDEMO\map docs\mxd\EIR\Regional.mxd | Last Updated : 11-19-07

Regional Location

FIGURE 1.3-1

HDR
ONE COMPANY | *Many Solutions*℠



Source: SanGIS; 2006 | G:\Projects\62610 EDGEMOORDEMO\map docs\mxd\EIR\Vicinity.mxd | Last Updated : 05-19-08

Vicinity Map

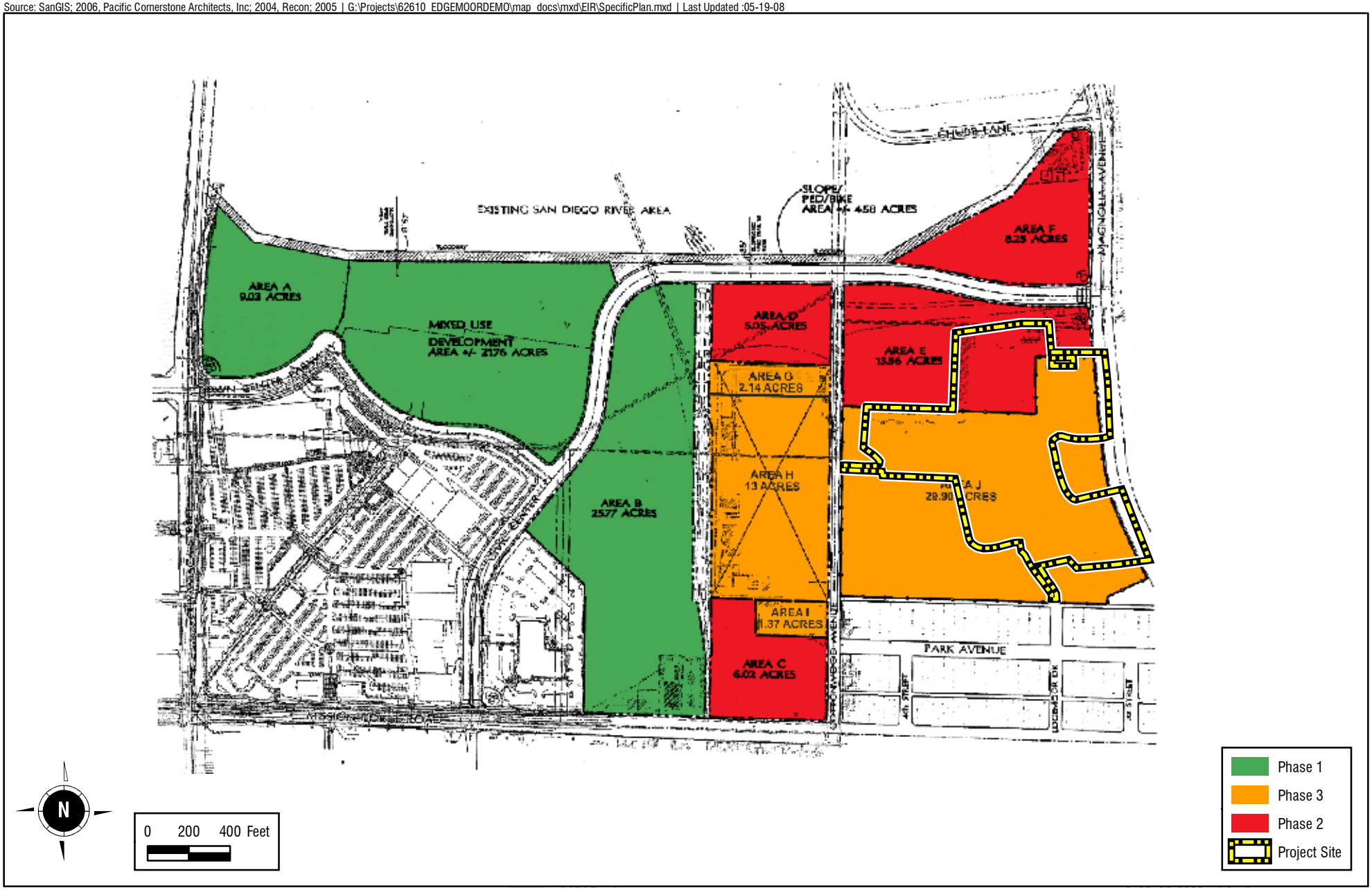
FIGURE 1.3-2

Source: SanGIS; 2006 | G:\Projects\62610 EDGEMOOR\DEMO\map docs\mxd\EIR\ProjectSite SurroundingLU.mxd | Last Updated : 05-19-08

Project Site and Surrounding Land Use

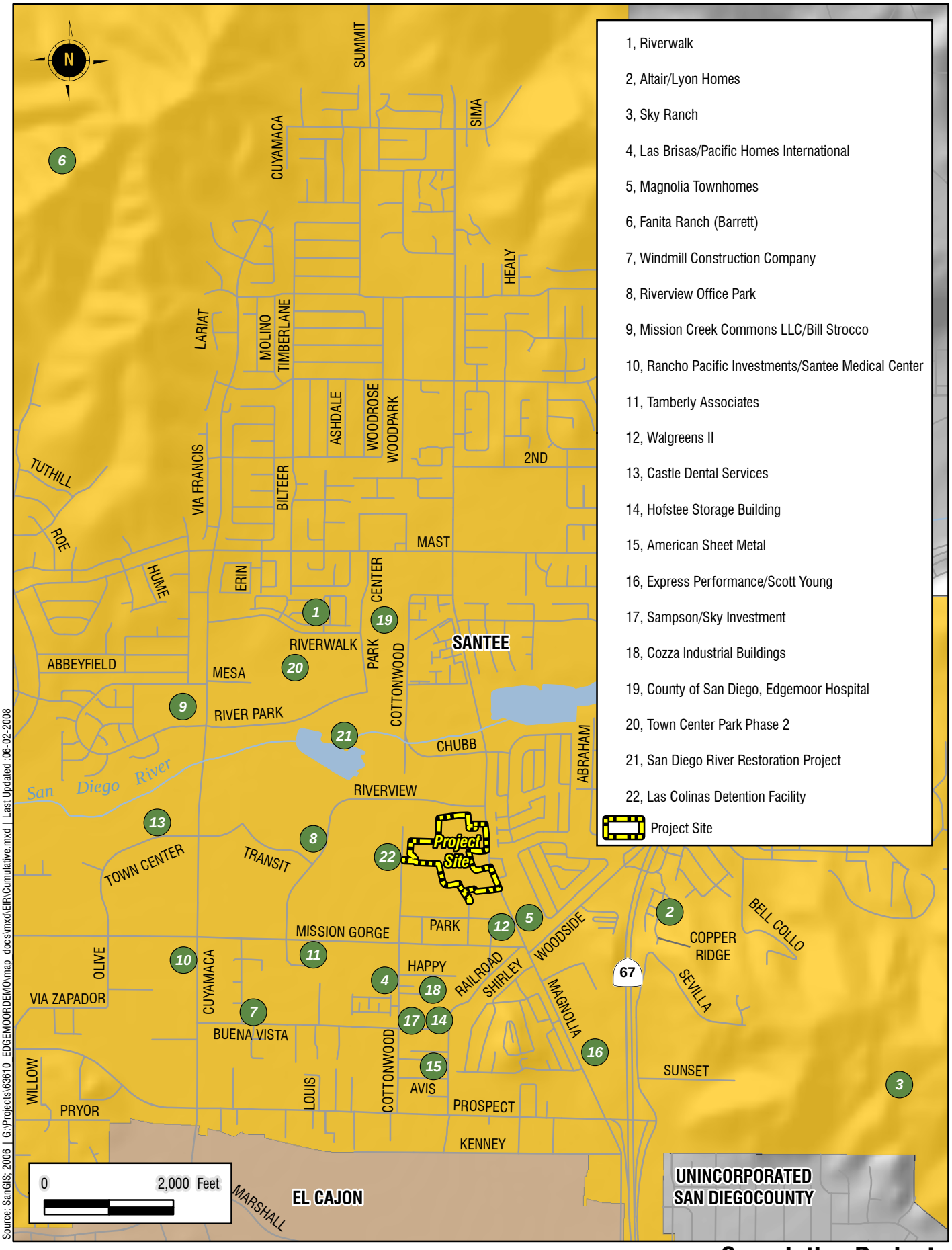
FIGURE 1.3-3

Source: SanGIS; 2006, Pacific Cornerstone Architects, Inc; 2004, Recon; 2005 | G:\Projects\62610_EDGEMOORDEMO\map_docs\mxd\EIR\SpecificPlan.mxd | Last Updated :05-19-08



Project Area Designations within Santee Town Center Specific Plan

FIGURE 1.6-1



Source: SanGIS; 2006 | G:\Projects\63610_EDGEMOORDEMO\map_docs\mxd\EIR\Cumulative.mxd | Last Updated :06-02-2008

Cumulative Projects

FIGURE 1.7-1

HDR ONE COMPANY | *Many Solutions*℠

Table 1.2-1. On-Site Structures

Building Number	Historic Use[1]	Contemporary Use[2]
1	Administration Building	Administration Building
2	Women's Ward	Offices, Pharmacy, Conference Room, Storage
3	Dining and Recreation Hall	Mess Hall, Housekeeping, Laundry
4	Unknown	Auxiliary Buildings/Library, Linen, Public Lounge
5	Men's Ambulatory Ward	Building Fragment
6	Men's Ward	Wheelchair repair, patient storage, thrift store
7	Dairy Barn/Men's Ambulatory Ward	Vacant
8	Dairy Barn/Men's Ambulatory Ward	Vacant
9	Dairy Barn/Men's Ambulatory Ward	Santee Food Bank
10[3]	Polo Barn	Barn, Storage
11	There was no historic use for this structure.	Connecting Corridor
12	Unknown	Garden Shop, Vehicle Garage, Gardener's Office
13	Rehabilitation Building/Semi-Ambulatory Building	Rehabilitation
14	Workshop	Engineering, Carpentry and Paint Shops, Carpenter's Shop
15	Boiler Plant, Building Maintenance and Engineering	Boiler Plant, Building Maintenance and Engineering
16	Dietary, Dining Room and Kitchen	Dietary, Dining Room and Kitchen
17	Santa Maria Building	Santa Maria Building
18	Enclosed Ward, Psychiatric Ward, Custodial Wards, Men and Women	Custodial Wards
19	Enclosed Ward, Psychiatric Ward, Custodial Ward, Men and Women	Custodial Wards
20	Microfilm Library, Bunker.	Vacant
21	Employee Apartments.	Vacant
22	Employee Apartments	Vacant
23	Employee Apartments.	Vacant
24	Employee Apartments	Vacant
25	Employee Laundry	Vacant
26	Employee Gas Station[4]	Vacant
27	Water Storage Tank and Pump House	Water Storage Tank and Pump House
N/A	Breezeways	Breezeways

Notes: [1] Historic use refers to the original use of the structures.
[2] Contemporary use refers to current use of the structures.
[3] The Polo Barn would be retained on-site.
[4] The underground diesel storage tanks were removed in October and November 1998, at which point the gas station was no longer in service (see Section VII, Hazards and Hazardous Materials, of the Initial Study included as Appendix A to this EIR).

Table 1.7-1. Cumulative Projects

Number[1]	Project Name	Description	Location
1	Riverwalk	218 single and multifamily units on 20.66-acre site with common recreation facilities	East of Cuyamaca St., south of Mast Boulevard, and north of Hoffman Lane
2	Altair/Lyon Homes	85 multi-family residences (condos) and one open space lot (7.93 acres) on a 17.6-acre parcel; swimming pool, spa, and tot lot	10887 Woodside Avenue (Padre Dam site off Woodside Avenue)
3	Sky Ranch	373 units (224 single-family and 149 multi-family) on 382.4 acres of vacant property	Western Portion of Rattlesnake Mountain
4	Las Brisas/Pacific Homes International	28 residential condos, pool, and tot lot on a 1.84-acre site	8834 and 8846 Cottonwood Avenue
5	Magnolia Townhomes	Subdivision of 1.081-acre site into 10 two-story detached residential buildings with common amenities including tot lot with playground and swimming pool	8943-59 Magnolia Ave.
6	Fanita Ranch (Barrett)	1,380 single-family residences and 25,000 sq. ft. commercial center	North of Fanita Parkway terminus
7	Windmill Construction Company	25 condominiums on 2-acre site surrounded by existing development.	Southeast corner of Buena Vista Avenue and Mission Greens
8	Riverview Office Park	6 commercial buildings totaling 63.504 sq. ft., surface parking and landscaping on 4.65 acres	Portion of Mixed use site in RiverView Office Park, within Town Center and north of Santee Trolley Station
9	Mission Creek Commons LLC/ Bill Strocco	4 buildings totaling 18,359 sq. ft. within the existing Mission Creek commercial center on Cuyamaca Street	9450, 9456, 9460, and 9466 Cuyamaca Street
10	Rancho Pacific Investments/ Santee Medical Center	Conversion of an existing building into 6 condominiums	8772 Cuyamaca Street
11	Tamberly Associates	8,724 sq. ft. one-story commercial building w/ 2,400 sq. ft. fast food restaurant, 57 parking spaces, 40 space R.V. storage lot, and approximately 9,728 sq. ft. of landscaping	10050-10055 Mission Gorge Road
12	Walgreens II	14,820 sq. ft. pharmacy and retail building on 1.59 acre lot. Located at 10512 Mission Gorge Road	10512 Mission Gorge Road at Magnolia
13	Castle Dental Services	3,000 sq. ft. bldg. on vacant building pad in the Santee Promenade Shopping Center	246 Town Center Parkway
14	Hofstee Storage Building	1,000 sq. ft. storage building	10358 Buena Vista Ave

Number[1]	Project Name	Description	Location
15	American Sheet Metal	An 11,619 sq. ft. industrial building off Railroad Avenue, will include 4,944 sq. ft. of landscaping, and 24 parking spaces on two parcels, totaling 0.75 acres	9472 Railroad Avenue
16	Express Performance/Scott Young	25,101 sq. ft. industrial and retail building on 1.5-acres of vacant property on Magnolia Avenue	8711 Magnolia Avenue
17	Sampson/ Sky Investment	14,954 sq. ft. industrial building on .87 acres. 8779 Cottonwood Avenue	8779 Cottonwood Avenue, NE corner with Buena Vista
18	Cozza Industrial Buildings	Subdivision of 6 parcels totaling 2.2 acres into 5 two-story industrial condos totaling 38,961 sq. ft., 79 parking spaces, and 9.920 sq. ft. of landscaping	Southeast end of Lunar Lane
19	County of San Diego Edgemoor Hospital	Two-story, 192-bed skilled nursing facility, 201-space parking lot, roadway improvements, drainage, and utility improvements	South of Mast Boulevard between Cottonwood Road and the proposed Woodrose Avenue
20	Town Center Park Phase 2	Approximately 55 net acres of community park located in central portion of City of Santee	Located in mixed use area of Town Center, with Magnolia Avenue to the east, Cuyamaca Street to the west, Mast Blvd. to the north, and San Diego River to the south.
21	San Diego River Restoration	Enhancement of approximately 140 acres of riparian habitat which could be used to provide mitigation for development projects.	San Diego River is bound by Cuyamaca Street, North Magnolia Avenue, and generally along the southern boundary of the 100-year floodplain of the river.
22	Las Colinas Detention Facility	Replacement of existing Las Colinas Detention Facility with a new 1,216-bed facility. Proposes 512,537 sq .ft. of inmate housing, administration facilities, visitation center, security administration and other facilities.	Northern terminus of Cottonwood Road, north of George Road, immediately west of the Edgemoor Hospital site.

Note: (1) Please see Figure 1.7-1 for a location of each cumulative project.

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2.0 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

This chapter of the EIR provides a detailed discussion of those subject areas for which project implementation would result in either (1) significant impacts that cannot be avoided and/or (2) significant impacts that can be avoided, reduced, or minimized through mitigation measures. This includes information developed during the Initial Study and the response period for the Notice of Preparation (NOP). The following environmental issue areas are discussed in this chapter:

- Biological Resources (Section 2.1)
- Cultural Resources (Section 2.2)
- Hazards and Hazardous Materials (Section 2.3)

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2.1 Biological Resources

This section presents a discussion of sensitive species that would be affected by implementation of the proposed project. Impacts to riparian or other sensitive habitats, federal and state protected wetlands, migratory fish and wildlife species, and local plans or ordinances were determined to be less than significant in the Initial Study prepared for the project (Appendix A). The following analysis is based on a bat survey letter report (2007) and smooth tarplant survey memorandum (2008) prepared by HDR Engineering, Inc. The letter report and memorandum are included in Appendix B. The study area consisted of the Edgemoor Facility Demolition project site.

2.1.1 Existing Conditions

2.1.1.1 Habitats/Vegetation Communities

The project site currently consists of the developed Edgemoor Geriatric Hospital and associated structures (Table 1.2-1). Habitats and vegetation communities found on-site are categorized under the Holland Code as non-native grassland (42200), extensive agriculture (18300), and urban/developed land (12000).

Non-native grassland is a mixture of annual grasses and broad-leaved, herbaceous species that comprise from 50 percent to more than 90 percent of the vegetative cover. Most annuals are nonnative species. Usually, the annual grasses are less than three feet in height, and form a continuous or open cover. Table 2.1-1 presents a list of the non-native plant species that were observed within the proposed demolition area. Emergent shrubs and trees may be present, but do not comprise more than 15 percent of the total vegetative cover.[1] The extensive agriculture found on-site is arable land that is not currently under rotation. Urban/developed land includes the on-site structures and landscaped vegetation (e.g., lawn, trees, shrubbery).

The trees on-site are predominantly eucalyptus; however, coast live oaks (*Quercus agrifolia*) are also found within the limits of the project area. Within the proposed demolition area, there are six mature and healthy oaks along Magnolia Avenue. These trees are estimated to be 75 years old. One multi-trunked sapling, approximately 5-10 years in age, is found adjacent to the library/microform bunker building in the southeast portion of the project site. Four additional oaks along Magnolia Avenue are not located within the proposed demolition area. No other oak trees were identified during the survey. In addition, the project site is located approximately 1,160 feet south of existing riparian vegetation within the San Diego River basin.

2.1.1.2 Sensitive Species

While no sensitive species or habitats were identified on-site, there is a potential for smooth tarplant, a California Native Plant Society (CNPS) List 1B species[2], to occur within the non-native grassland areas of the project site. Smooth tarplant have been identified approximately 1,160 feet north of the project site (City of Santee 2006). This population is one of only four known in San Diego County. The other three are located in the desert. Due to the presence of non-native grassland and known occurrence of this species on adjacent properties, a smooth tarplant survey was conducted by HDR (2008). No smooth

[1] County of San Diego Land Use and Environment Group, Report Format and Content Requirements, Biological Resources. December 2007.
[2] CNPS List 1B species include plants that are rare, threatened, or endangered in California and elsewhere.

tarplant were detected during the survey. Please see Appendix B for a summary memo of the smooth tarplant survey.

In addition, a number of sensitive bats have been identified within the County inhabiting structures similar to those located on-site. A pallid bat roost was known to occur historically on-site. Furthermore, the riparian vegetation located north of the project site supports least Bell's vireo, a federally- and state-listed endangered species[3] (HDR 2007).

2.1.2 Analysis of Project Effects and Determination as to Significance

The following section identifies guidelines for the determination of significance, analyzes the impacts associated with the proposed project, and provides a conclusion of significance for impacts to sensitive species. The significance criterion described below is based upon the County of San Diego Guidelines for Determining Significance for Biological Resources (December 2007).

2.1.2.1 Sensitive Species

Guidelines for the Determination of Significance

For the purposes of this EIR, the proposed project would result in significant impacts to biological resources if it has 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 (CDFG) and Game or U.S. Fish and Wildlife Service (USFWS).

Analysis

Due to the lack of suitable habitat, no candidate, sensitive, or special-status species were identified or have the potential to occur on-site with the exception of smooth tarplant, sensitive bats, and raptors. The San Diego River, which is located approximately 1,160 feet from the project site, is known to support least Bell's vireo. Potential impacts to smooth tarplant, sensitive bats, raptors, and least Bell's vireo are discussed in more detail below.

Smooth Tarplant

Smooth tarplant has been identified approximately 1,160 feet north of the project site (City of Santee 2006). Due to the presence of non-native grassland and known occurrence of this species on adjacent properties, a smooth tarplant survey was conducted by HDR (2008). No smooth tarplant were detected during the survey. Please see Appendix B for a summary memo of the smooth tarplant survey. Therefore, no impact to this sensitive species will occur and no significant impact is identified.

Sensitive or Special Status Bats

Bat surveys were conducted for the project site in October 2007 (Appendix B). Although the project site has been identified as an historic location of a pallid bat roost, no signs of bats (i.e., guano or carcasses) were identified at any location, with the exception of Buildings 7 and 12. The majority of the on-site

[3] Habitat assessments for the San Diego River Restoration Project – Edgemoor Property have identified this species within the vicinity of the San Diego River.

structures do not provide appropriate bat habitat or are well-sealed to prevent entry. While bat signs (guano) were present at two structures, it is unlikely that bats have recently inhabited the site due to the aged condition of the guano. Re-roofing of Building 7 has occurred within the last six months and has likely disturbed any bats that may have been located within the building and sealed up potential entry/exit points. Therefore, building 7 is no longer of concern from a sensitive bat species perspective as it can no longer provide suitable habitat.

However, Building 12 remains open, providing opportunity for bat access, and small- and medium-sized bats (e.g., Townsend's big-eared bats or pallid bats) to inhabit the structure. Townsend's big-eared bat and pallid bat are listed as County-sensitive species, are considered sensitive by the CDFG, and are a California Species of Concern (CSC). While the guano does not suggest recent use, due to the nature of the structure, it is possible that sensitive bat species may be present within Building 12, including maternity colonies.

The removal of a structure that has the potential to supports maternity colonies (pregnant bats or bats caring for their young) is of concern. Pregnant bats could either be killed directly due to project demolition, or if the structure is no longer available, they may not have adequate time to find another suitable and secure roost before giving birth. Pregnant bats are also more susceptible to predation. For those bats that may use the structure with their young, these bats will leave their young that are not yet able to fly at the roost while they leave to feed. Young bats that are not able to fly could be killed either through building demolition or starvation due to abandonment. Therefore, removal of Building 12 would result in a significant direct project impact if bats are pregnant or caring for their young in the building during demolition (Impact BIO-1).

The structure can also be considered "habitat" in that it provides a suitable place for bat roosting. From a habitat perspective, the loss of one building is not considered significant, as it would represents the loss of only one building. Therefore, the removal of Building 12 would not be significant from a habitat perspective.

Raptors

The project site supports coast live oak trees, eucalyptus trees and some small patches of non-native grassland, which can provide nesting and foraging areas for raptors. Due to the presence of these resources on the project site, there is a potential for CSC raptors (birds of prey) to be present. Should demolition-related activities (e.g., staging) extend off the pavement into these areas, there is a potential to temporarily impact non-native grasslands. However, as this impact would only be temporary and the non-native grassland would continue to serve as viable foraging habitat after demolition occurs, this impact would be considered less than significant. Should a raptor be nesting in the on-site trees, and demolition were to occur within 500 feet of the nest, there is a potential for a significant direct project impact to occur (Impact BIO-2).

Least Bell's Vireo

The project is located approximately 1,160 feet south of existing riparian vegetation within the San Diego River basin. This vegetation supports least Bell's vireo, a Federally- and State-listed endangered species. Demolition activity could generate noise which may impact the species. However, given the rate at which noise attenuates over distance, there is no potential for the demolition activities to impact riparian habitat that could be used by sensitive avian species. The 1,160 feet is an adequate buffer for any demolition-

related noise to attenuate and precludes any direct or indirect impacts. Therefore, potential impacts to least Bell's vireo would be less than significant.

2.1.3 Cumulative Impact Analysis

As identified in Section 2.1.2, demolition activities associated with the project have the potential to impact sensitive species. Townsend's big-eared bat or pallid bat could be impacted by demolition activities if the species are found to roost in Building 12 at the time of demolition. Similarly, if raptors, are nesting in on-site trees, they too could be impacted by demolition activities. Therefore, this cumulative impact analysis focuses on these two issue areas, as those are the only issue areas where the project would have the potential add to a cumulative impact.

The cumulative impact study area for biological resources includes the cumulative projects identified in Table 1.7-1. The cumulative analysis area for biological resources includes projects proposed within the San Diego River floodplain and adjacent habitats within an approximate one-mile radius of the project site. Please see Figure 1.7-1 for the location of each of the cumulative projects. Each of the projects was analyzed to determine the type of biological resource impacts associated with each project.

Table 2.1-1 summarizes the biological resources impacts for each of the cumulative projects. Several of the cumulative projects included in Table 2.1-1 are under environmental review. Determinations of impacts for these projects were based upon project file review at the City of Santee Department of Development Services.

Sensitive or Special-Status Bats

Potentially significant impacts to sensitive bat species were identified for the project. Cumulative projects in the vicinity of the proposed project were reviewed to determine if any of those projects would also have potential impacts to sensitive bat species. All of the cumulative project identified in Section 1.7 of this EIR.

According to project file review at the City of Santee Department of Development Services, none of the cumulative projects reviewed would have the potential to impact sensitive bat species. Therefore, no cumulative impact related to sensitive bat species is identified and the project would not add to any type of cumulative impact to sensitive bat species.

Raptors

Construction activities associated with the County of San Diego, Edgemoor Hospital and demolition activities associated with the proposed project have the potential to impact nesting raptors in nearby trees. Cumulative projects in the vicinity of the proposed project were reviewed to determine if any of those projects would also have potential impacts to raptors. All of the cumulative project identified in Section 1.7 of this EIR.

According to project file review at the City of Santee Department of Development Services, two of the cumulative projects reviewed have the potential to impact raptors. Construction activities associated with the County of San Diego, Edgemoor Hospital and the Riverview project have the potential to impact nesting raptors in nearby trees. However, the impact is reduced to below a level of significance through the implementation of timing restrictions on demolition when raptors are presents. None of the other cumulative projects considered would have the potential to impact nesting raptors.

Some of the cumulative projects reviewed have the potential to indirectly impact raptors through the loss of nonnative grassland, which can serve as raptor foraging habitat. Six of the cumulative project will result in nonnative grassland impacts. Those projects include: Altair/Lyon Homes, Fanita Ranch, Riverview Office Park, San Diego River Restoration, Sky Ranch and Town Center Phase 2. Each of these cumulative projects will mitigate for their loss of nonnative grassland through the purchase of replacement habitat at a suitable mitigation bank. Therefore, other foraging habitat for raptors will be preserved in perpetuity.

Mitigation measures identified for the project, as well as the cumulative project will ensure that direct impacts to raptor due to construction activities do not occur. Further, mitigation identified for the cumulative projects that impact nonnative grassland will ensure that suitable foraging habitat is preserved. Therefore, cumulative impacts to raptors are determined to be less than significant and the project would not add to any type of cumulative impact to raptors.

2.1.4 Growth Inducing Impacts

The proposed project involves the demolition and removal of existing structures and does not propose any new development on the project site. The project does not propose the extension or expansion of any public services or utilities, nor does it proposed the extension of roadways which would have the potential to impact biological resources. New development consistent with the City's General Plan and Town Center Specific Plan, including potential institutional or residential uses, could be built on-site in the future, but is not proposed at this time.

The removal of the buildings has the potential to make future development easier to construct as the site would already be cleared. However, this future development has been contemplated in the EIRs prepared for both the Santee General plan and the Town Center Specific Plan. While the demolition and removal of the buildings has the potential to make the site easier to develop, it would not encourage any development that has not already been considered in the two plans previously mentioned nor result in additional impacts. Future development of the site in accordance with these plans has been evaluated within either the City of Santee General Plan EIR or the Town Center Specific Plan EIR. Future development would be subject to review under these plans and CEQA. Pursuant to CEQA Guidelines Section 15162(a)(2), if any on-site conditions change, new environmental analysis would be required when future development is proposed for the project site. Since the project does not propose new development and does not extend any existing infrastructure, the project is determined to not be growth inducing.

2.1.5 Significance of Impacts Prior to Mitigation

Implementation of the project has the potential to impact sensitive species including sensitive bats and raptors. Sensitive bats could be directly impacted due to the removal of Building 12. Sensitive raptors could also be impacted due to demolition activities should raptors be nesting in adjacent trees. Both of these impacts related to the project are determined to be potentially significant.

2.1.6 Mitigation

The following mitigation measures shall be implemented to reduce impacts to biological resources to below a level of significance.

Mitigation for Impact BIO-1: Sensitive Bats

MM BIO-1 A pre-demolition clearance survey for sensitive bats shall be conducted prior to the demolition of Building 12. Surveys shall be conducted within one week prior to building demolition. Should any bats be found inhabiting the building, demolition shall be avoided from March through August in order to avoid impacts to pregnant females or young incapable of flying. Bats found inhabiting a maternity colony after August shall be allowed to exit the roost and prevented from reentering. Demolition will not occur until all bats have departed.

Mitigation for Impact BIO-2: Raptors

MM BIO-2 In accordance with the Migratory Bird Treaty Act, potential nesting vegetation (i.e., trees, shrubs, ground cover, etc.) and buildings supporting MBTA-covered species shall be avoided during the nesting season, recognized from February 15 through August 31. Should demolition occur between these dates, a qualified biologist shall conduct a survey no more than three days prior to demolition activity to identify any active nests. If active nests are identified during the surveys, then the nesting vegetation or buildings shall be avoided until the nesting event has completed and the juveniles can survive independently from the nest. The biologist shall flag the areas that are considered to support sensitive raptors and establish a 500 foot buffer (e.g., exclusionary flagging/fencing) around these areas, consistent with the San Diego County Multiple Species Conservation Program (MSCP). Demolition activities shall not occur within the buffer until the nesting event has been completed.

2.1.7 Conclusion

Due to the presence of bat sign (i.e., guano) and the open-nature of Building 12, there is a potential for sensitive bats to be present on-site. Prior to building demolition, pre-demolition clearance surveys shall be conducted which would identify if there are any sensitive bats on-site and provide methods to avoid impacts to the species. Implementation of MM BIO-1 would reduce direct impacts to less than significant levels. Since the project avoids all impacts, no significant cumulative impacts to bats were identified. Cumulative impacts to sensitive bat species were determined to be less than significant.

Due to the presence of appropriate foraging habitat and mature trees on-site, there is a potential for raptors to be present. Potential direct impacts to nesting raptors would be reduced through implementation of MM BIO-2, which establish buffers and avoid any occupied nests. This would ensure direct impacts to these species would not occur. Cumulative impacts to raptors were determined to be less than significant.

Table 2.1-1. Non-native Grassland Species Observed on the Project Site

Scientific Name	Common Name
Ambrosia psilostachya	western ragweed
Amsinckia menziesii	fiddleneck
Anagallis arvensis	scarlet pimpernel
Avena barbata	slender wild oat
Avena fatua	wild oat
Bromus catharticus	rescuegrass
Bromus diandrus	ripgut brome
Bromus madritensis	red brome
Camissonia sp	suncups
Chamaesyce albomarginata	rattlesnake spurge
Chenopodium alba	tumbleweed
Chenopodium murale	goosefoot
Conyza bonariensis	flax-leaf fleabane
Conyza canadensis	horseweed
Cynodon dactylon	Bermuda grass
Eremocarpus setigerus	quail mullein
Erodium cicutarium	red-stem filaree
Hirschfeldia incana	field mustard
Hordeum jubatum	foxtail barley
Hordeum vulgare	barley
Lactuca serriola	prickly lettuce
Lolium perenne	English ryegrass
Malva parviflora	cheeseweed
Polypogon monspeliensis	rabbitsfoot
Salsola pestifer	Russian thistle
Schinus molle	Peruvian pepper
Schismus barbatus	split grass
Sysimbrium irio	London rocket
Urtica urens	pygmy nettle

Table 2.1-2. Biological Resources for Cumulative Projects

Project Name	Description	Project Type	Impacts to Biological Resources
Altair/Lyon Homes	85 multi-family residences (condos) and one open space lot (7.93 acres) on a 17.6-acre parcel; swimming pool, spa, and tot lot	Residential Approved or Under Construction	Project would impact 2.23 of 3.78 acres of non-native grassland. No gnatcatchers or raptors were observed, but mitigation includes compliance with Migratory Bird Treaty Act (MBTA). All impacts would be reduced to below a level of significance.
American Sheet Metal	An 11,619 sq. ft. industrial building off of Railroad Avenue, will include 4,944 sq. ft. of landscaping, and 24 parking spaces on two parcels, totaling 0.75 acres	Industrial Approved or Under Construction	No significant impacts
Castle Dental Services	3,000 sq. ft. bldg. on vacant building pad in the Santee Promenade Shopping Center	Commercial/Office Under Review	No significant impacts
County of San Diego Edgemoor Hospital	Two-story, 192-bed skilled nursing facility, 201-space parking lot, roadway improvements, drainage, and utility improvements	Civic, Non-profit, Institutional Approved or Under Construction	No sensitive plants would be impacted. Raptor nest observed in the eucalyptus on-site; loss would represent significant impact but mitigation including compliance with the MBTA would reduce impacts to below a level of significance.
Cozza Industrial Buildings	Subdivision of 6 parcels totaling 2.2 acres into 5 two-story industrial condos totaling 38,961 sq. ft., 79 parking spaces, and 9.920 sq. ft. of landscaping	Industrial Under Review	No significant impacts
Express Performance/Scott Young	25,101 sq. ft. industrial and retail building on 1.5-acres of vacant property on Magnolia Avenue	Industrial Approved or Under Construction	No significant impacts
Fanita Ranch (Barrett)	1,380 single-family residences and 25,000 sq. ft. commercial center	Residential Under Review	Direct and long-term indirect impacts to raptor foraging habitat would occur; however, these impacts would be less than significant. Raptor roosting habitat would also experience long-term indirect impacts. These impacts would also be less than significant because the habitat would be buffered and fenced. Construction activity may result in short-term impacts to sensitive nesting birds. These impacts would be reduced to

Project Name	Description	Project Type	Impacts to Biological Resources
			below a level of significance through implementation of the proposed open space (1,412 acres + 210 acres off-site) and associated design features. The project would impact 204.4 acres of non-native grassland. These impacts would be mitigated through the preservation of open space and implementation of a proposed Habitat Restoration Plan.
Hofstee Storage Building	1,000 sq. ft. storage building	Commercial/Office Under Review	No significant impacts
Las Brisas/Pacific Homes International	28 residential condos, pool, and tot lot on a 1.84-acre site	Residential Approved or Under Construction	No significant impacts
Las Colinas Detention Facility	1,216-bed detention facility	Civic, Non-profit, Institutional Under Environmental Review	No significant impacts
Magnolia Townhomes	Subdivision of 1.081-acre site into 10 two-story detached residential buildings with common amenities including tot lot with playground and swimming pool	Residential Approved or Under Construction	No significant impacts
Mission Creek Commons LLC/ Bill Strocco	4 buildings totaling 18,359 sq. ft. within the existing Mission Creek commercial center on Cuyamaca Street	Commercial/Office Approved or Under Construction	No significant impacts
Rancho Pacific Investments/ Santee Medical Center	Conversion of an existing building into 6 condominiums	Commercial/Office Approved or Under Construction	No significant impacts
Riverview Office Park	6 commercial buildings totaling 63.504 sq. ft., surface parking, and landscaping on 4.65 acres	Commercial/Office Approved or Under Construction	Impacts to non-native grassland would be mitigated through purchase of credits at an approved mitigation bank. A smooth tarplant relocation plan and subsequent long-term management plan for this plant exist. Impacts would be less than significant.
Riverwalk	218 single and multifamily units on 20.66-acre site with common recreation facilities	Residential Approved or Under Construction	There is potential to impact nesting raptors if construction occurs during breeding season. Mitigated through compliance with the MBTA. Potential impacts to non-native grassland would be mitigated at a 0.5:1 ratio.

Project Name	Description	Project Type	Impacts to Biological Resources
Sampson/ Sky Investment	14,954 sq. ft. industrial building on .87 acres. 8779 Cottonwood Avenue	Industrial Under Review	No significant impacts
San Diego River Restoration	Enhancement of approximately 140 acres of riparian habitat which could be used as mitigation for development projects.	Civic, Non-profit, Institutional Approved or Under Construction	Indirect impacts to sensitive wildlife have the potential to result during construction activities. These potential impacts would be reduced to below a level of significance through avoidance and minimization mitigation measures. Sensitive species include: least Bell's vireo, California gnatcatcher, yellow warbler, Cooper's hawk, San Diego black-tailed jack rabbit, and American white pelican. 35.1 acres of vegetation will be impacted (0.402 acres of freshwater marsh, 0.20 acres of Diegan Coastal Sage Scrub, 0.50 acres Baccharis Scrub, 23.5 acres of non-native grassland, 5.60 acres of agricultural land, 1.60 acres of disturbed habitat, 3.00 acres of tamarisk scrub, and 0.30 acres of southern cottonwood willow riparian habitat). Habitat enhancement through project implementation would reduce impacts to below a level of significance and provide additional high value habitat.
Sky Ranch	373 units (224 single-family and 149 multi-family) on 382.4 acres of vacant property	Residential Approved or Under Construction	Potentially significant impacts to raptors and raptor habitat. Impacts would be mitigated through compliance with the MBTA. Impacts to 0.2 acre of non-native grassland would be mitigated at a 0.5:1 ratio. All impacts would be mitigated to below a level of significance.
Tamberly Associates	8,724 sq. ft. one-story commercial building w/ 2,400 sq. ft. fast food restaurant, 57 parking spaces, 40 space R.V. storage lot, and approximately 9,728 sq. ft. of landscaping	Commercial/Office Approved or Under Construction	No significant impacts

Project Name	Description	Project Type	Impacts to Biological Resources
Town Center Park Phase 2	Approximately 55 net acres of community park located in central portion of City of Santee	Major City Capital Improvement Projects	Potentially significant direct impacts to raptor foraging habitat (24.79 acres of non-native grassland). Impacts would be mitigated through obtaining non-native grassland credits at a 0.5:1 ratio. Impacts to raptor nesting habitat (2.24 acre eucalyptus woodland) are also potentially significant, and would be mitigated through compliance with MBTA.
Walgreens II	14,820 sq. ft. pharmacy and retail building on 1.59-acre lot. Located at 10512 Mission Gorge Road	Commercial/Office Under Review	No significant impacts
Windmill Construction Company	25 condominiums on 2-acre site surrounded by existing development	Residential Under Review	No significant impacts

Note. Please see Figure 1.7-1 for a location of the cumulative projects.

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2.2 Cultural Resources

The following section analyzes the project's impacts to historical resources. This analysis is based on a Historical Resources Evaluation Report prepared by Heritage Architecture & Planning and IS Architecture in March 2008 (Appendix C). The report evaluated all on-site structures that collectively comprise the current Edgemoor Geriatric Hospital (Figure 1.2-1). Impacts to archaeological and paleontological resources as well as human remains were determined to be less than significant in the Initial Study prepared for the project (Appendix A).

2.2.1 Existing Conditions

Pre-European-contact Native Americans used the San Diego River Valley for centuries. Once the Europeans came to the Valley, the area has been occupied by a variety of uses including Mission grazing lands, and later as a ranch and commercial dairy farm, polo pony ranch, County Poor Farm and Home for the Aged and Indigent, and finally as a publicly-funded geriatric, rehabilitation, and mental health facility as it remains today. Historical uses on the site can be characterized in three distinct periods: (1) the Dairy and Polo Pony Farm era (1913-1921); (2) the Poor Farm era (1923-1949); and (3) the Edgemoor Geriatric Hospital era (1950-2008). The project site is currently developed with 27 structures (including the Polo Barn which would be retained) that comprise the Edgemoor Geriatric Hospital. The following discussion provides information on the historical events as well as the architectural integrity of the structures on the site during these eras.

The Dairy and Polo Pony Farm Era (1913-1921)

Although dairy ranching on-site started as early as 1902, the uses on the site beginning in 1913 contributed to local, national, and international events. The Dairy and Polo Pony Farm era began with the purchase of Edgemoor Farms, which included residences and a number of barns and outbuildings, by Walter Dupee in 1913. Dupee constructed a number of additional structures, including a residence (demolished in the 1950s) and the following extant buildings between 1913 and 1915: Polo Barn (Building 10), three dairy barns (Buildings 7, 8, and 9), a gardener's shop (Building 12), and a small square hut (Building 4). The Polo Barn, constructed by Dupee in 1913, is the only historic resource at the site that is currently listed on the National Register of Historic Places. The six extant buildings associated with the Dairy and Polo Pony Farm Era (Buildings 4, 7, 8, 9, 10, and 12) are not officially designated as a historic district, but meet the definition of a historic district.[1] These buildings, however, are listed in the California Register. Additional discussion of these buildings qualification for the California Register is presented in the Poor Farm Era discussion that follows on the next page. See Figure 1.2-1 for a location of these buildings.

Even before Dupee purchased Edgemoor Farms, it was a successful commercial dairy with a major physical and economic presence in Santee and the El Cajon Valley. Dupee expanded operations on-site and ran a successful dairy farm using an imported herd of Guernsey cattle. It brought national recognition to the region's thriving dairy industry. Dupee's groundbreaking and scientific approach to animal husbandry gained him national and international recognition. Under Dupee, the farm was responsible for increasing knowledge and raising standards in cattle rearing and dairy production. Through experiments

[1] According to 36 CFR 60, Section 60.3(d), an historic district is "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history."

with modern scientific methods and equipment, Edgemoor Farms became the country's leading authority in Guernsey cattle.

In addition to the dairy operations, Dupee also raised fancy polo ponies. These ponies put Santee on the map internationally. From Edgemoor Farms, Dupee's polo ponies were sent to exclusive country clubs all over the state and country. A polo player of note, Dupee is credited with the notable distinction of having been instrumental in promoting the spread of polo both nationally and internationally.

The Poor Farm Era (1923-1949)

In relation to the proposed project, the Poor Farm era began in 1923, when the County of San Diego purchased Edgemoor Farms for use as a sustainable farm facility which provided care of the aged, indigent, and other disenfranchised members of society, such as orphans and the mentally ill. Edgemoor was one of the last and largest county or municipality-funded poor farms and homes for the aged and indigent in the state and the nation.

The 1930s saw the enactment of post-Great Depression New Deal social policies, the end of the funding of new poor farms, and the transition of existing facilities to county-run hospitals. All of the state's poor farms were eventually phased out, or they evolved into specialized geriatric care facilities.

San Diego's first poor farm was established in Mission Valley in 1883. Patients were moved to the new County Hospital in Hillcrest in 1904, and subsequently to Edgemoor in 1923. This County home was founded primarily for the benefit of able-bodied elderly persons of sound mind who were lacking the financial means necessary to live in private old age homes.

Following the purchase of the property, the County commissioned Quayle Brothers Architects to design a number of buildings on-site between 1923 and 1929. These buildings include Buildings 2, 3, 6, 14, 15, and 18, which were used as a women's ward, dining hall, men's ward, boiler building, and enclosed wards (the architectural context of these buildings is discussed below). Buildings 19 (Enclosed Ward), 26 (Employee Gas Station), and 27 (Water Tank/Pump House) were also constructed during the Poor Farm Era. Please see Figure 1.2-1 for a location of these buildings.

In 1947, the poor farm was officially renamed the *Home of the Aged and Indigent of San Diego County*. By the end of the decade, farming activities had been substantially scaled back and the focus on the emerging field of geriatric medicine was intensifying.

The Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district was nominated but not accepted for placement on the National Register of Historic Places (National Register) in 1987. However, the determination of National Register eligibility triggered the listing of the site on the California Register of Historical Resources (California Register) in 1987 due to its role in the development of poverty relief and social services prior to the enactment of Federal New Deal policies during the Great Depression. Buildings included in the State listing included Buildings 2, 4, 6-10, 12, and 14-15. According to San Diego County Ordinance No. 9493 of August 2002, as a State-listed property, the Historic District is also eligible for listing on the San Diego County Local Register of Historical Resources. All buildings associated with the Poor Farm Era fit the definition of an historic district, including those not officially listed on the California Register.

Geriatric Hospital Era (1950-2008)

By the end of the 1940s, farming had been substantially scaled back at Edgemoor and the institution was rapidly transitioning into a medical geriatric facility. A new patient care facility, the Santa Maria Building (Building 17), was under construction by 1950, as were new employee apartment units located in the southeast corner of the property close to Magnolia Avenue (Buildings 21 through 25). In addition, a connecting corridor (Building 11) was constructed in 1954 as a building element to join Buildings 18 and 19 and breezeways were constructed in 1960 to provide a roofed passageway between buildings. The dedication ceremony for the new facilities, including a new kitchen and dining room (Building 16), took place on January 23, 1951. Please see Figure 1.2-1 for a location of these buildings.

The construction of the Santa Maria Building, Kitchen & Dining Building, Staff Apartments and Administration Building (Building 1) modernized the look of the then over twenty-year-old campus. By 1955, farming had been completely phased out and thus completed the transition of the Edgemoor facility to exclusively hospital operations. With an expanded bed capacity of 596 patients, Edgemoor became the third largest facility of its kind in the state, one of the largest in the country.

The facility was licensed in 1956 as a Public Medical Institution under the name "Edgemoor Geriatric Hospital." With the general population of elderly people increasing, Edgemoor's new function had developed directly out of its earlier role as home for aged indigents. In 1961, Edgemoor was the first institution of its kind to receive a State license for a Specialized Hospital in the Field of Geriatrics.

In the early 1970s, Edgemoor was re-licensed as a "Skilled Nursing Facility" with a primary focus on rehabilitation and short-term care for both the young and the elderly. By the end of the 1980s, Edgemoor had become a health provider for poor people with AIDS, Alzheimer's, Huntington's and other disabling diseases. Medi-Cal, or in a few cases by private coverage, contribute to fund operational costs.

The converted dairy barns (Buildings 7, 8 and 9), which are no longer used by the hospital, are used by a non-profit food bank on an interim basis. The Polo Barn (Building 10), is currently used for storage.

The facility is still functioning as a skilled nursing facility; however, a replacement facility is being constructed and will be ready for occupancy in late 2008. The new facility would be an approximately 160,000 square foot, state-of-the-art 192-bed skilled nursing complex north of the existing facility.

The buildings associated with the Geriatric Hospital era have not been listed as an historic district but meet the requirements for designation, as identified in Section 2.2.2.1.

Architectural Integrity of the On-Site Structures

The Quayle Brothers are locally recognized Master Architects responsible for designing over one hundred buildings in the San Diego region, and nearly every building and facility constructed by the County of San Diego, between 1906 and 1939.[2] Charles and Edward Quayle were the sons of another recognized Master Architect, William Quayle. While a great deal of their work has been lost, several Quayle Brothers resources have been designated historic and listed on the National Register of Historic Places and California Register of Historical Resources (e.g., the Old San Diego Police Headquarters, the Owl Drug Building at 402 Broadway in San Diego, the Pythias Lodge at 211 E Street, the Whitney Building at

[2] According to the U.S. General Services Administration Eligibility Assessment Tool, a Master Architect is defined as "a prominent architect whose work has an important influence on a community, region, state, or Country" (GSA).

743 4th Avenue, and the Ingle Building at the Northeast corner of 4th and F Street in San Diego, which are contributors to the National Register Gaslamp Quarter Historic District).

The Quayle Brothers were commissioned to design many schools, hospitals, theatres, commercial buildings, residences, fire stations, warehouses and other building types in the region. As such the Quayle Brothers influenced the area's visual character while creating the infrastructure needed to support its rapidly expanding population. The extensive and eclectic body of work attributed to the Quayle Brothers defined the physical transformation of San Diego from a small western frontier town near the Mexican border into a bona fide city.

The Quayle Brothers became local leaders in the design of hospitals and other public institutions and were tasked with planning many publicly funded facilities throughout San Diego during the 1910s and 1920s. Versatility was demonstrated in their ability to design a number of different building types with various specialized and complex functions. The architects exhibited a depth of knowledge ranging from the latest in medical practices and social philosophies to up-to-date mechanical systems.

In 1923, the Quayle Brothers were commissioned by the County to design a series of buildings for the newly acquired Edgemoor Dairy Farm, to be converted into the County's poor farm and home for the aged and indigent. The Quayle Brothers-designed Edgemoor complex of poor farm-related buildings has been identified as a unique resource and rare example of early Transitional Modern, Proto-International style architecture with subtle Pueblo and Mission Revival influences in the San Diego-Southern California region. The six extant buildings consist of Buildings 2, 3, 6, 14, 15, and 18, which were used as a women's ward, dining hall, men's ward, boiler building, and enclosed wards.

The Quayle Brothers buildings are simple, utilitarian, and economically designed with minimal adornment. The buildings feature southern California regional influences and demonstrate the architects' experimentation with new architectural theories to create functional, economical and attractive commissions for their largest client, the County of San Diego. The buildings are some of the last known surviving examples of County-commissioned Quayle Brothers' projects.

2.2.2 Analysis of Project Effects and Determination as to Significance

The following section identifies guidelines for the determination of significance, analyzes the impacts associated with the proposed project, and provides a conclusion of significance for impacts to historical resources. The significance criterion described below is based upon the County of San Diego Guidelines for Determining Significance for Cultural Resources (December 2007).

The analysis considered the impact of the project from an historical perspective as it pertains to both architectural features, as well as the impact that the loss of buildings could have to an historical district. That is to say, some building may be important in their own right (architecturally) and are also important in the context (contributing to events that were important to the region's history) of an historical district. Other buildings may only be important as they contribute collectively to an historical district but individually do not have architectural significance.

2.2.2.1 Historical Resources

Guidelines for the Determination of Significance

For the purposes of this EIR, the proposed project would result in significant impacts to historical resources if it causes a substantial adverse change in the significance of a historical resource.

According to State CEQA Guidelines Section 15064.5(a)(1), historical resources shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852).

A substantial adverse change is characterized as the physical demolition, destruction, relocation, or alternative of the resources or its immediate surroundings such that the significance of the historical resource would be materially impaired (State CEQA Guideline Section 15064.5(b)(1).

The State (CEQA Guidelines, Section 15064.5 states that "a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.[3]"

[3] Hereinafter referred to as Criteria A-D

National historic significance is based on similar criteria. Historic evaluations conducted for the on-site buildings by IS Architecture and Heritage Architecture & Planning assessed the significance of the historical resources based on a review of historical records and an architectural evaluation.

Analysis

The historical resources evaluation report identified that the on-site structures retain high levels of integrity of location, design, setting, materials, workmanship, feeling, and association overall and demonstrate significance within one or more periods of significance: the Dairy and Polo Pony Farm Era (1913-1921), the Poor Farm Era (1923-1949), and the Geriatric Hospital Era (1950-2008). Table 2.2-1 identifies each structure located on-site and its date of construction, identifies whether the structure contributes to an historic district, and under which criteria, provides a description of each structure's historical integrity[4]. Table 2.2-1 also provides a qualitative assessment of the buildings as related to alterations from its original construction.

Dairy and Polo Pony Farm Era (1913-1921)

Within the context of the Edgemoor Dairy and Polo Pony Farm era, six extant buildings constructed during this period of significance and the surrounding landscape, which was previously used for polo and grazing fields, have a strong association with Walter Dupee, a figure instrumental in promoting the spread of polo and influential in the breeding of cattle for the dairy farming industry (Buildings 4, 7-10, and 12). As identified above, Dupee trained and bred polo ponies on-site and became one of the Country's leading authorities in the husbandry of such horses. The six extant Dairy and Polo Pony Farm era buildings have a direct connection to Dupee and represent the infrastructure of his regionally-, nationally-, and internationally-recognized commercial dairy and polo pony ranch which he operated for eight years. This association qualifies the historic district for National Register eligibility at the state level of significance under Criterion B for its strong association with Walter Dupee. A description of each building comprising the Dairy and Polo Pony Farm Era historic district is provided below.

Building 4 (Auxiliary Building)

Building 4 was constructed in 1913 and the interior and exterior was heavily altered between 1923 and 1949. Building 4 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee.

Building 7 (Dairy Barn No. 1)

Constructed in 1913, this building was originally used as a dairy barn. The exterior of Building 7 has been altered by replacement of the original clapboard siding with stucco. The building exterior

[4]Historical integrity for each structure was evaluated based on seven aspects including location (the place where the historic property was constructed or place where the historic event occurred), design (the combination of elements the create the form, plan, space, structure, and style of a property), setting (the physical environment of an historic property), materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form an historic property), workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory), feeling (a property's expression of the aesthetic or historic sense of a particular period of time), and association (the direct link between an important historic event or person and an historic property). This evaluation is consistent with the National Park Service *National Register Bulletin, No. 15: How to Apply the National Register Criteria for Evaluation.*

configuration has also been altered by the addition of connecting rooms at the south ends of the buildings. The interior was heavily altered between 1923 and 1949. It retains high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee.

Building 8 (Dairy Barn No. 2)

Constructed in 1913, Building 8 was originally used as a dairy barn. The exterior of Building 8 has been minimally altered, while the interior has been heavily altered between 1923 and 1949. It retains high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee.

Building 9 (Dairy Barn No. 3)

Constructed in 1913, this building was originally used as a dairy barn. The exterior of Building 9 has been minimally altered, while the interior has been heavily altered between 1923 and 1949. It possesses high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee.

Building 10 (Polo Barn)

Constructed in 1913, the Polo Barn was placed on the National Register of Historic Places in 1985 due to its association with Walter Dupee, its role in the scientific development of the national dairy farming industry, and its place in the national and international history of polo. This building retains high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee. Alterations to the interior and exterior have been minimal.

Building 12 (Garden Shop)

Constructed in 1913, both the interior and the exterior of Building 12 have been minimally altered. Building 12 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association as related to Walter Dupee.

The Poor Farm Era (1923-1949)

A total of 15 buildings and the surrounding landscape are associated with the Poor Farm era (Buildings 2-4, 6-10, 12, 14-15, 18-19, and 26-27). This includes the six extant Dairy and Polo Pony Farm era buildings identified above as well as the now fallow agricultural fields surrounding the buildings. The 15 Poor Farm era buildings express national, state, and local significance within the context of poverty relief and social policy. The on-site collection of buildings associated with this era is one of the most intact surviving examples of a Pre-New Deal County-operated poor farm left in the country with minimal architectural modifications.

Ten[5] of these structures were identified in 1987 as comprising the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district (Buildings 2, 4, 6-10, 12, and 14-15) and have been listed on the California Register of Historical Resources under Criterion A for their association with the establishment and development of pre-New Deal concepts of social welfare and institutions for the care and treatment of the dependent poor in California. According to the historical resources evaluation report

[5] At the time of listing, Buildings 7-9 were reported as one structure, so the nomination was for eight buildings.

(Appendix C), five additional structures (Buildings 3, 18, 19, 26, and 27) are also considered to contribute to the historic district; however, these buildings are not part of the California Register of Historic Resources listing.

The historical resources evaluation report also assigned a higher level of significance and greater degree of integrity than identified in 1987 to the site. Applicable nomination criteria were also expanded to include Criterion C, for embodying the distinctive characteristics of a type, period, and method of construction and for representing the work of recognized Master Architects. Eligibility under Criterion C was based on the architecturally-significant Quayle Brothers buildings, as discussed below.

Six extant Poor Farm era buildings (Buildings 2, 3, 6, 14, 15, and 18) were designed by the Quayle Brothers, recognized Master Architects for their contribution to the region's architecture. These buildings constitute a unique Quayle Brothers resource and are some of the last known surviving examples of County-commissioned Quayle Brothers' projects. Furthermore, these six buildings are a rare intact and relatively unaltered example of the Quayle Brothers' stark and utilitarian style buildings with boxy massing and minimal adornment that placed them at the forefront of architectural innovation during the 1920s.

In summary, the 15 buildings associated with the Poor Farm era are significant under a combination of Criteria A, B, and C. A brief description of each building is provided below.

Buildings 4, 7-10, and 12, which were identified above as comprising the Dairy & Polo Pony Farm era historic district that is eligible for listing based on Criterion B, are also components of the Edgemoor Farm and San Diego County Home for the Aged and Indigent era historic district. Buildings 4, 7-10, and 12 were included on the original state listing of the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district in 1987 under Criterion A for their association with the property's important agricultural activities of this period.

Building 2 (A1 – Women's Ward)

Constructed in 1926, Building 2 was designed by the Quayle Brothers for use as a Women's Ward and has been minimally altered. It was also included on the original state listing of the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district in 1987 under Criterion A. It retains high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 3 (Dining & Recreation Hall)

Constructed in 1923-24, Building 3 was designed by the Quayle Brothers and has been minimally altered, with the exception of two small additions to the rear portion of the building. It was not included on the original state listing of the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district in 1987, but is eligible for listing. Building 3 retains high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 6 (A3 – Men's Ward)

Building 6 was constructed in 1926 and designed by the Quayle Brothers for use as a men's ward. It has been minimally altered, with non-historic door openings in place of a window on the north end of the building, as well as new partitions. It was also included on the original state listing of the Edgemoor

Farm and San Diego County Home for the Aged and Indigent historic district in 1987 under Criterion A. Building 6 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 14 (Workshop)

This building was constructed in 1926 and designed by the Quayle Brothers for use as a workshop. It has been minimally altered and was also included on the original state listing of the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district in 1987 under Criterion A. Building 14 retains high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 15 (Boiler Plant)

Building 15 was phased in construction in 1926 and 1929 and designed by the Quayle Brothers. It has been minimally altered and was also included on the original state listing of the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district in 1987 under Criterion A. Building 15 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 18 (A4 – Enclosed Ward)

Building 18 was constructed in 1929 and designed by the Quayle Brothers for use as an enclosed psychiatric ward. It has been minimally altered. Building 18 was not included on the original state listing of the district in 1987, but is eligible for listing. It retains high integrity of location, design, setting, materials, workmanship, feeling, and association for both Poor Farm and architectural components.

Building 19 (A5 – Enclosed Ward)

Building 19 was constructed in 1945 and designed by E.L. Freeland for use as an enclosed psychiatric ward. It has been minimally altered. Building 19 was not included on the original state listing of the district in 1987, but is eligible for listing. It possesses high integrity of location, design, setting, materials, workmanship, feeling, and association for its relationship to the Poor Farm.

Building 26 (Employee Gas Station)

Building 26 was constructed in 1940 for use as an employee gas station. Building 26 was not included on the original state listing of the district in 1987. It has been minimally altered and possesses high integrity of location, design, setting, materials, workmanship, feeling, and association for its relationship to the Poor Farm.

Building 27 (Water Storage Tank/Pump House)

Building 27 was constructed in ca. 1940 for use as a water storage tank and pump house. Building 27 was not included in the original state listing of the district in 1987. It has been minimally altered and possesses high integrity of location, design, setting, materials, workmanship, feeling, and association for its relationship to the Poor Farm.

The Geriatric Hospital Era (1950-2008)

The Geriatric Hospital era historic district, eligible for local listing under Criteria A and C, consists of nine buildings (Buildings 1, 13, 16-17, and 21-25).[6] Except for Building 13 all other buildings are over 50 years old. Eligibility of this district under Criterion A for representing a broad pattern in the state and national development of publicly-funded nursing and rehabilitation care for the dependent aged and indigent is based on the buildings which represent the facility's transition to an early institution in the field of geriatrics. Eligibility under Criterion C for embodying the distinctive characteristics of a type, period, and method of construction is based on the facility's transition away from a farm and "old folks home" into a skilled medical care facility for the County's dependent aged and critically sick and associated architectural designs based on current concepts of Modern Architecture. As a collection, the buildings illustrate Edgemoor's historic transition from a Poor Farm into a specialized care facility. A brief description of each building is provided below.

Building 1 (Administration Building)

Constructed in 1958, Building 1 has been minimally altered. Building 1 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Building 11 (Connecting Corridor)

Constructed in 1954, Building 11 has been minimally altered. Building 11 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Building 13 (Rehabilitation Building)

Constructed in 1961, Building 13 has been minimally altered. Building 13 retains high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Building 16 (Dietary)

Constructed in 1951, Building 16 has historically been used as a dining room and kitchen. It has been minimally altered. Building 16 retains high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Building 17 (Santa Maria Building)

Building 17 was constructed in 1951 and has been minimally altered. Building 17 possesses high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

[6] It should be noted that Buildings 2-4, 6-9, 12, 14-15, 18-19, and 26-27, which are contributors to the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic districts, also contribute to the Geriatric Hospital Era historic district. Buildings 4, 7-9, and 12 contribute to the Dairy and Polo Pony Farm era, the Edgemoor Farm and San Diego County Home for the Aged and Indigent historic districts, and the Geriatric Hospital Era historic district. See the analysis above for a discussion of the integrity of these buildings.

Buildings 21-25 (Employee Apartments and Laundry)

Constructed in 1951, these five buildings have historically been used as employee apartments and laundry facilities. They have been minimally altered. Buildings 21-25 retain high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Breezeways

Constructed in 1960, the breezeways are not 50 years old. They are unaltered and possess high integrity of location, design, setting, materials, workmanship, feeling, and association related to the field of geriatric medicine.

Landscaping

Landscaping located close to structures that are proposed for demolition may be removed. However, to the greatest extent practicable, no trees or extensive amount of landscaping will be disturbed. The minor removal of landscaping that may need to be removed due to adjacency of buildings does not constitute a significant impact.

The existing on-site structures retain historical significance under a combination of Criteria A, B, and C. As the project proposes to demolish all existing on-site structures with the exception of the National Register-listed Polo Barn (Building 10), it would result in a significant impact to these resources (Impact CR-1). While no direct impact to Building 10 would occur, removal of the surrounding buildings would reduce its historic setting, which represents an aspect of the integrity of the resource.

Based on the results of this evaluation, it has been determined that demolition of the historic resources located on-site would be significant pursuant to CEQA Guidelines, Section 15064.5.

2.2.3 Cumulative Impact Analysis

The cumulative projects in the vicinity of the proposed project are listed in Section 1.7 of this EIR. It should be noted that the cumulative analysis for this project reaches beyond just those projects on the cumulative project list, since the buildings have regional, state and national importance as one of the largest geriatric facilities in the country and the only publicly funded facility of its kind in the country.

According to project file review, none of the projects contained on this list have significant historical resources with the exception of the Las Colinas Detention Facility (LCDF). The LCDF project would require the demolition of three buildings that are also being considered for demolition under the proposed project. These include the Santa Maria Building, the Dietary Building and the Rehabilitation Building within the Edgemoor site. While the cumulative projects in the immediate project vicinity do not result in any loss to historical resources beyond those already considered in the project EIR; the unique nature of the historical resources on the project site result in a cumulative impact if demolished. This is due to the fact that there has been a regional loss of buildings designed by the Quayle Brothers, the loss of buildings designed by the Quayle Brothers on the Edgemoor site would be significant from a cumulative perspective. In addition, the loss of one of the largest geriatric facilities in the country and the only publicly funded facility of its kind in the country represents a significant cumulative impact. Further, the loss of the buildings associated with the dairy and polo pony farm era on the project site adds to the loss of agricultural landscapes and early farming operations in San Diego County. Further, the farm was associated with Walter Dupee, a figure instrumental in promoting the spread of polo and influential in the

breeding of cattle for the dairy farming industry. Therefore, the loss of these resources that have a regional, state and national importance also contributes to a significant cumulative impact.

2.2.4 Growth Inducing Impacts

The proposed project involves the demolition and removal of existing structures and does not propose any new development on the project site. The project does not propose the extension or expansion of any public services or utilities, nor does it proposed the extension of roadways which would result in additional impacts to cultural resources. New development consistent with the City's General Plan and Town Center Specific Plan, including potential institutional or residential uses, could be built on-site in the future, but are not proposed at this time.

The removal of the buildings has the potential to make future development easier to construct as the site would already be cleared. However, this future development has been contemplated in the EIRs prepared for both the Santee General plan and the Town Center Specific Plan. While the demolition and removal of the buildings has the potential to make the site easier to develop, it would not encourage any development that has not already been considered in the two plans previously mentioned nor result in additional impacts. Future development of the site in accordance with these plans has been evaluated within either the City of Santee General Plan EIR or the Town Center Specific Plan EIR. Future development would be subject to review under these plans and CEQA. Pursuant to CEQA Guidelines Section 15162(a)(2), if any on-site conditions change, new environmental analysis would be required when future development is proposed for the project site. Since the project does not propose new development and does not extend any existing infrastructure, the project is determined to not be growth inducing.

2.2.5 Significance of Impacts Prior to Mitigation

The proposed demolition of the project site would adversely affect buildings and districts that meet the criteria contained within CEQA Guidelines Section 15064.5, including National Register-listed, National Register-eligible, State Register-listed, and State Register-eligible properties that cover three periods of significance.

2.2.6 Mitigation

The following mitigation measures shall be implemented to reduce impacts to cultural resources.

Mitigation for Impact CR-1: Historical Resources

MM CR-1 The project applicant shall prepare appropriate level Historical American Building Survey (HABS) documentation in accordance with the National Park Service's *Historic American Building Survey Guidelines for Preparing Written and Historical Descriptive Data* as identified below:

Building Number	HABS Level
1	III (Architectural Significance; District Contributor)
2	II (Historical and Architectural Significance; District Contributor)
3	II (Historical and Architectural Significance; District Contributor erroneously left off original list)
4	II (Historical Significance; District Contributor)

Building Number	HABS Level
5	II (Historical and Architectural Significance; District Contributor)
6	II (Historical and Architectural Significance; District Contributor)
7	II (Historical and Architectural Significance; District Contributor)
8	II (Historical and Architectural Significance; District Contributor)
9	II (Historical and Architectural Significance; District Contributor)
10	Not required; demolition of this structure would not occur
11	II (Historical and Architectural Significance; District Contributor)
12	II (Historical and Architectural Significance; District Contributor)
13	III (Historical and Architectural Significance; District Contributor)
14	II (Historical and Architectural Significance; District Contributor)
15	II (Historical and Architectural Significance; District Contributor)
16	III (Historical and Architectural Significance; District Contributor)
17	III (Historical and Architectural Significance; District Contributor)
18	II (Historical and Architectural Significance; District Contributor)
19	II (Historical and Architectural Significance; District Contributor)
20	Not required; unassociated County of San Diego facility
21	IV (District Contributor)
22	IV (District Contributor)
23	IV (District Contributor)
24	IV (District Contributor)
25	IV (District Contributor)
26	II (Historical and Architectural Significance; District Contributor)
27	II (Historical and Architectural Significance; District Contributor)
Breezeways	IV (District Contributor)

Note: Buildings requiring HABS Level IV documentation exhibit moderate to no significance in and of themselves; however, HABS documentation would still be required due to the buildings' contribution to the overall context of the site.

MM CR-2 An historic interpretive site model shall be prepared including buildings constructed prior to the 1960s. Interpretive information, such as light-up coded information showing the different phases of use, shall be included. The interpretive model shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the interpretive model shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board.

An historic interpretive display shall be prepared including buildings constructed after 1960 and shall include a combination of wall-mounted, pedestal, and table-top displays and interactive activities. Information presented in the interpretive display shall include, but is not limited to, a site model, an historic description of the various uses of the project

site and surrounding landscape, historic photographs, excerpts from oral interviews, a documentary film running on a monitor when activated by a visitor, or representative salvaged artifacts from the demolished buildings. The documentary film shall include site footage, interviews with current and former staff and patients, music, titles/captions, and historic photographs. The interpretive display shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the interpretive display shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board.

2.2.7 Conclusion

The proposed demolition of the Edgemoor site would result in the loss of the Dairy and Polo Pony Farm era historic district, the California Register-listed Edgemoor Farm and San Diego County Home for the Aged and Indigent historic district (which includes representative buildings from the Quayle Brothers, Master Architects), and the Geriatric Hospital Era historic district through direct demolition. The National Register-listed Polo Barn would be indirectly impacted by demolition of nearby structures. While the Polo Barn is not proposed for demolition, the removal of the surrounding buildings would eliminate its historic setting, which represents a major aspect of the integrity of the resource.

Impacts would be reduced with implementation of MM CR-1, which identifies the appropriate HABS documentation for each on-site structure. The appropriate level of HABS documentation is based on the amount and type of material available relating to each structure as well as their significance and integrity. Additionally, implementation of mitigation measure MM CR-2, which requires preparation of an interpretive site model depicting the various on-site structures and uses as they appeared during the interpretive period would further reduce impacts to these resources. Implementation of mitigation measure MM CR-2 also requires preparation of an historic interpretive display about the history of the project site and surrounding landscape as well as the salvage of historic artifacts or building features, which would convey a sense of history at the project site, further reducing impacts to these resources. However, even with implementation of MM CR-1 and MM CR-2, impacts to the Dairy and Polo Pony Farm era, Poor Farm era, and Geriatric Hospital era historic districts would remain significant. Therefore, a Statement of Findings and Overriding Considerations would be required pursuant to CEQA Guidelines Sections 15091 and 15093.

Implementation of the proposed project would also result in a significant contribution to a cumulative impact to historical resources. Implementation of mitigation measures MM CR-1 and MM CR-2, which have been identified for the proposed project would help to reduce some of the impact, however, the cumulative impact would remain significant and unmitigated, and a Statement of Findings and Overriding Considerations would be required pursuant to CEQA Guidelines Sections 15091 and 15093.

Table 2.2-1. On-Site Structures and Historical Integrity

Bldg. No.	Bldg. Name	Date of Construction	Historic District			Register Criteria[1]				Integrity						
			Dairy & Polo Pony Farm (1913-1922)	Edgemoor Farm San Diego County Home for the Aged and Indigent (1923-1949)	Geriatric Hospital (1950-2008)	A	B	C	D	Location	Design	Setting	Materials	Workmanship	Feeling	Association
1	Admin. Building	1958			X	X		X		X	X	X	X	X	X	X
2	A1 (Women's Ward)	1926		X	X	X		X		X	X	X	X	X	X	X
3	Dining & Recreation Hall	1923-24		X	X	X		X		X	X	X	X	X	X	X
4	Auxiliary Building	ca.1913	X	X	X	X	X			X	X	X	X	X	X	X
5	Building Fragment	ca.1913								X		X				X
6	A3 (Men's Ward)	1926		X	X	X		X		X	X	X	X	X	X	X
7	Dairy Barn No. 1	ca.1913	X	X	X	X	X			X	X	X	X	X	X	X
8	Dairy Barn No. 2	ca.1913	X	X	X	X	X			X	X	X	X	X	X	X
9	Dairy Barn No. 3	ca.1913	X	X	X	X	X			X	X	X	X	X	X	X
10	Polo Barn	1913	X	X		X	X			X	X	X	X	X	X	X
11	Connecting Corridor	ca. 1954			X					X	X	X	X	X	X	X
12	Garden Shop	ca.1913	X	X	X	X	X			X	X	X	X	X	X	X
13	Rehabilitation Building (Pico Building)	1961			X	X		X		X	X	X	X	X	X	X
14	Workshop	ca.1926		X	X	X		X		X	X	X	X	X	X	X
15	Boiler Plant	1926, 1929		X	X	X		X		X	X	X	X	X	X	X
16	Dietary	1951			X	X		X		X	X	X	X	X	X	X
17	Santa Maria Building	1951			X	X		X		X	X	X	X	X	X	X
18	A4 (Enclosed Ward)	1929		X	X	X		X		X	X	X	X	X	X	X
19	A5 (Enclosed Ward)	1945		X	X	X		X		X	X	X	X	X	X	X
20	Microfilm Records Storage Bunker	1954	Unassociated County of San Diego Facility			N/A				N/A						
21	Employee Apartments	1951			X	X		X		X	X	X	X	X	X	X
22	Employee Apartments	1951			X	X		X		X	X	X	X	X	X	X
23	Employee Apartments	1951			X	X		X		X	X	X	X	X	X	X
24	Employee Apartments	1951			X	X		X		X	X	X	X	X	X	X
25	Employee Laundry	1951			X	X		X		X	X	X	X	X	X	X
26	Employee Gas Station	ca.1940		X	X					X	X	X	X	X	X	X
27	Water Tank/Pump House	ca.1940		X	X					X	X	X	X	X	X	X
N/A	Breezeways	ca.1960			X					X	X	X	X	X	X	X

[1] Explanation of Register Criteria
A: Is associated with events that have made a significant contribution to the broad patterns of our history/Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
B: Is associated with the lives of persons significant in our past
C: Embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
D: Has yielded, or may be likely to yield, information important in prehistory or history.

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2.3 Hazards and Hazardous Materials

The following section analyzes the project's impacts resulting from routine transport, storage, use, or disposal of hazardous wastes. Impacts resulting from accidental spills, presence of hazardous materials near schools or on-site, proximity to public or private airports, interference with an emergency response plan, wildfire risk, and exposure to vectors were determined to be less than significant in the Initial Study prepared for the project (Appendix A).

2.3.1 Existing Conditions

Hazardous materials include solids, liquids, or gaseous materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, could pose a threat to human health or the environment. Hazards include the risks associated with potential explosions, fires, or release of hazardous substances in the event of an accident or natural disaster, which may cause or contribute to an increase in mortality or serious illness, or pose substantial harm to human health or the environment.

The project site is currently developed with the Edgemoor Geriatric Facility, which is composed of 26 buildings. On-site structures were constructed between 1913 and 1961. According to communication with County staff, the County Department of Environmental Health (DEH) has surveyed some of the buildings and identified asbestos-containing material (ACM) in a number of the structures. The materials include: spray-applied ceiling material, ceiling tiles, interior drywall/joint compound systems, plaster, vinyl flooring, exterior stucco, roofing materials, etc. Asbestos is a strong, non-combustible material which was used in many commercial products prior to the 1940s and up until the early 1970s. If inhaled, asbestos fibers can result in serious health problems.

Low levels of lead-based paint (LBP) have also been detected in two buildings by the County DEH. Prior to 1978, LBP was commonly used in consumer products.[1] Additionally, based upon the age of the other on-site structures (ranging from 1913 to 1961), it is likely that LBP was used and is present on-site, as all on-site structures were constructed prior to 1978. Intact LBP is not considered a hazardous material; however, disturbed LBP or LBP in poor condition (peeling and cracking) can create potential health hazards for people living or working in the vicinity.

Two 2,000 gallon underground diesel storage tanks and one 1,200 gallon above-ground diesel storage tank associated with the gas station (Building 26) were located on the project site. These three tanks were removed in October and November 1998. According to the DEH (Appendix D), releases from the two underground storage tanks were identified. Diesel range hydrocarbons were detected in shallow soil samples collected from below the concrete floor of the basement of the facility's mechanical room. Concentrations of diesel were low and decreased substantially with depth. Corrective action was taken for the affected material in compliance with the requirements of subdivisions (a) and (b) of Section 25299.37 of the Health and Safety Code and no further action related to the petroleum releases at the site is required. No groundwater, drinking water, or surface water has been affected by the releases of the tanks.

The nearest existing sensitive receptors to the project site include residents located approximately 100 feet east of the project site. In addition, the new Skilled Nursing Facility will be located approximately 0.5 mile north of the project site.

[1] In 1978, the U.S. Consumer Product Safety Commission banned the application of lead-based paint for consumer use (16 CFR 1303).

2.3.2 Analysis of Project Effects and Determination as to Significance

The following section identifies guidelines for the determination of significance, analyzes the impacts associated with the proposed project, and provides a conclusion of significance for impacts resulting from routine transport, storage, use, or disposal of hazardous wastes. The significance criterion described below is based upon the County of San Diego Guidelines for Determining Significance for Hazardous Materials and Existing Contamination (July 2007).

2.3.2.1 Demolition of Structures Containing Hazardous Materials

Guidelines for the Determination of Significance

For the purposes of this EIR, the proposed project would result in significant hazards and hazardous materials impact creates a significant hazard to the public or environment through the demolition of structures containing hazardous materials (e.g. lead based paint or asbestos containing materials).

Analysis

The project proposes the demolition and removal of all existing on-site structures, with the exception of the Polo Barn. Due to the age of the structures, as well as past investigations by the County, ACM or LBP are known to occur in some of the buildings. Therefore, demolition of the buildings has the potential to make ACM and LBP particles airborne.

Disturbed ACM particles could enter the air, and workers exposed to ACM could develop health problems. Additionally, sensitive receptors (multi-family residential units) are located approximately 100 feet east of the project site. Therefore, removal of structures containing ACM represents a significant impact to workers and a potential impact to adjacent sensitive receptors if workers are not informed that ACM are in the buildings and the proper handling of materials are not conducted (Impact HAZ-1). Therefore, mitigation is required to reduce potential impacts to below a level of significance.

Demolition of the structures would also disturb surfaces painted with LBP, resulting in lead in the air which could impact workers if inhaled. Additionally, sensitive receptors (multi-family residential units) are located approximately 100 feet east of the project site. Therefore, removal of structures containing LBP represents a significant impact to workers and a potential impact to adjacent sensitive receptors if workers are not informed that LBP are in the buildings and the proper handling of materials are not conducted (Impact HAZ-2). Therefore, mitigation is required to reduce potential impacts to below a level of significance.

2.3.2.2 Transport, Storage, Use, or Disposal of Hazardous Wastes

Guidelines for the Determination of Significance

For the purposes of this EIR, the proposed project would result in significant hazards and hazardous materials impact if it creates a significant hazard to the public or the environment through the transport, storage, use, or disposal of hazardous materials or wastes.

Analysis

With the exception of the presence of ACM and LBP, as noted above, there are no hazardous materials that would be located on-site or could be released to the environment. All storage, handling, transport, emission, and disposal of hazardous substances would be in full compliance with federal, state, and local regulations. Specifically, the San Diego County DEH Hazardous Materials Division (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. 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. As identified above, two underground diesel storage tanks and one above-ground diesel storage tank were formerly located on the project site with documented releases; however, according to DEH (Appendix D), remediation has occurred in compliance with the requirements of subdivisions (a) and (b) of Section 25299.37 of the Health and Safety Code and no further action is required.

Due to the strict requirements that regulate hazardous substances outlined above and the fact that initial planning, ongoing monitoring, and inspections would occur in compliance with federal, state, and local regulations, the project would not create any significant hazard to the public or environment related to the routine transport, storage, use, and disposal of hazardous substances, with the exception of ACM or LBP.

2.3.3 Cumulative Impact Analysis

Significant impacts related to the disturbance and transport of ACM and LBP-containing materials were identified for the project. Cumulative projects in the vicinity of the proposed project were reviewed to determine if any of those projects would also have impacts related to the demolition and transport of ACM- and LBP-containing materials. All of the cumulative projects identified in Section 1.7 of this EIR were considered in this cumulative analysis.

According to project file review at the City of Santee Department of Development Services, none of the cumulative projects reviewed would result in significant impacts due to disturbance or transport of ACM or LBP, as these materials were not identified on any cumulative project site. Furthermore, no demolition of existing structures was identified in any of these projects. Therefore, no cumulative impact related to hazards and hazardous materials is identified and the project would not add to any type of cumulative impact related to hazards and hazardous materials.

2.3.4 Growth Inducing Impacts

The project proposes the demolition and removal of all existing on-site structures, with the exception of the Polo Barn. No development is proposed as part of the project. New development consistent with the City's General Plan or Town Center Specific Plan could be built on-site in the future. Environmental review has been completed for both the City's General Plan and Town Center Specific Plan. The project does not propose any modifications to any planned land uses that differ from any adopted plan. Furthermore, any future development on the project site would require separate environmental review. Therefore, there would be no growth inducing impacts.

2.3.5 Significance of Impacts Prior to Mitigation

The project proposes the demolition and removal of 26 existing structures. Impacts associated with the routine transport, use, or disposal of hazardous substances are potentially significant due to the presence of ACM or LBP in the on-site structures. Demolition of the on-site structures would disturb these existing materials, resulting in potentially significant impacts to workers.

2.3.6 Mitigation

The following mitigation measures shall be implemented to reduce potentially significant impacts to workers resulting from the disturbance of ACM and LBP to below a level of significance.

Mitigation for Impact HAZ-1: Asbestos-Containing Materials

MM HAZ-1 Prior to any demolition, renovation, or any other activity that may disturb known or potential ACM, either an inspection shall be performed by the DEH, Occupational Health Program (OHP), or the affected materials shall be handled as asbestos-containing in accordance with all federal and state requirements, including the County of San Diego Administrative Manual Asbestos Policy 0050-01-9. If future sampling identifies any such materials as ACM, they shall be properly abated and disposed of by a state-licensed abatement contactor prior to disturbance or demolition in accordance with all federal and state requirements.

In addition, the Air Pollution Control District (APCD) and California Occupational Safety and Health Administration (Cal/OSHA) have notification requirements pertaining to the disturbance of ACM. When applicable, these notifications must be made prior to the activity as follows:

- Ten day notification to APCD for renovation/demolition activities.
- 24-hour notification of Cal/OSHA.

Mitigation for Impact HAZ-2: Lead-Based Paint

MM HAZ-2 Prior to any activity that may cause lead exposure to workers, LBP sampling shall be performed in accordance with all federal and state requirements. Should future demolition disturb any suspect paint, a LBP inspection or risk assessment shall be conducted by a state or federally certified LBP inspector/assessor to identify areas of potential worker exposure in accordance with all federal and state requirements, including Title 17, CCR Section 35005. Should any LBP be identified, such painted surfaces shall be included in an approved interim controls (Operations and Maintenance) program and disposed of by a state-licensed abatement contractor.

2.3.7 Conclusion

Implementation of the project would result in potentially significant impacts due to the disturbance and possible release of ACM or LBP. ACM was determined to be present on the project site by the San Diego County DEH and is likely to be located within other on-site structures do to their age. The demolition of structures with ACM could result in serious health problems if asbestos fibers are inhaled. However, through implementation of MM HAZ-1, all affected materials shall be properly abated and

disposed of by a state-licensed abatement contractor prior to disturbance or demolition. Implementation of this mitigation measure would reduce potential impacts due to ACM to below a level of significance. Also, LBP was detected on-site in at least two of the structures proposed for demolition. Due to the age of the structures on-site, the presence of LBP in other structures is considered likely. Demolition of the structures may result in lead in the air, which represents a potentially significant impact to workers and adjacent sensitive receptors, if inhaled. Implementation of MM HAZ-2 would reduce this potential impact to below a level of significance because it would ensure that any risks associated with LBP disturbance are properly handled by a federally or state certified LBP inspector/assessor in accordance with all federal and state requirements.

In conclusion, with implementation of mitigation, potential impacts related to hazards and hazardous materials would be reduced to below a level of significance.

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3.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

3.1 Effects Found Not Significant as Part of the EIR Process

3.1.1 Global Climate Change

The following section analyzes the project's contribution to global climate change due to project emissions. This analysis is based upon a Greenhouse Gas/Global Warming Risk Assessment prepared by Investigative Sciences and Engineering. The complete report is included in Appendix H of the EIR.

3.1.2 Existing Conditions

Global climate change, or variations on a global scale in the earth's temperature and weather patterns, is an emerging environmental concern being raised on statewide, national, and global levels. It has been attributed to combined worldwide greenhouse gas (GHG) emissions. GHGs are gases that trap infrared radiation as heat in the earth's atmosphere. While GHGs play a role in keeping the Earth's temperature in a range conducive for life, emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the naturally-occurring greenhouse effect.

GHGs are naturally occurring; however human activities can increase emissions of such gases through industrial/manufacturing, combustion, agricultural activities, and landfills. GHGs include, but are not limited to, carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4). Transportation is responsible for 41 percent of the state's GHG emissions, followed by the industrial sector (23 percent), electricity generation (20 percent), agriculture and forestry (8 percent), and other sources (8 percent) (California Energy Commission 2006).

Emissions of CO_2 and N_2O are byproducts of fossil fuel combustion, among other sources. CH_4 results from off-gassing associated with agricultural practices and landfills, among other sources. Sinks[1] of CO_2 include vegetation and the ocean. As shown in Table 3.1-1, California GHG emissions in 2004 totaled approximately 492 million metric tons carbon dioxide equivalent (MMT-CO_2e).

Assembly Bill (AB) 1493 of 2002 required the California Air Resources Board (CARB) to develop and adopt the nation's first GHG emission standards for automobiles. On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-2005 (Cal EPA 2007), which calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions by 2050. In addition, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006 (Health & Safety Code Section 38500 et seq.), in September 2006. AB 32 codified the state's GHG emissions target by requiring that California's global warming emissions be reduced to 1990 levels by 2020. In addition, AB 32 directs CARB to make available a list of early action GHG emission reduction measures by June 30, 2007. These measures were updated in October 2007 (CARB 2007). Regulations to implement these measures shall be adopted before January 1, 2010, and the finalized emissions reduction measures will become operative and enforceable January 1, 2012.

[1] A CO_2 sink is a resource that absorbs CO_2 from the atmosphere. The classic example of a sink is a forest in which vegetation absorbs CO_2 and produces oxygen through photosynthesis.

Environmental Consequences of Global Climate Change

According to CEQA Guidelines Section 15002(a)(1), one of the basic purposes of CEQA is to "inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities." Although a discussion of global warming impacts is not currently required by the CEQA Statutes or Guidelines, it is the view of the State Legislature (as expressed in its adoption of AB 32) that global warming poses a potentially significant adverse effect to the environment of the state of California and the entire world. In addition, the global scientific community has expressed at least 90 percent confidence that global warming is anthropogenic (i.e., caused by humans) and that global warming will lead to adverse climate change effects around the globe (IPCC 2007). Therefore, the potential global warming impacts of the proposed project are analyzed below.

3.1.3 Analysis of Project Effects and Determination as to Significance

Guidelines for the Determination of Significance

Section 15328 of the CEQA Guidelines defines a significant impact as "… a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Although global warming and the associated greenhouse gas effects are not explicitly defined under CEQA and yet to have any defined set of significance standards, Section 15382 is sufficiently broad enough in definition to allow its discussion within the air quality topic of CEQA.

Analysis

This analysis considered the GHG emissions from both the demolition and the hauling portions of the project. The entire demolition and hauling is assumed to take 180 days, with demolition occurring for 120 of the 180 days.

Demolition

For the demolition the project was assumed to use two CAT D8 bulldozers and two loaders as well as a water truck for dust control. Demolition is assumed to take up to 120 days. The emissions of this demolition equipment are presented in Table 3.1-2.

N_2O has a global warming potential of 296 with respect to CO_2. This means that one pound of N_2O is equivalent to 296 pounds of CO_2 with regard to its global warming potential. The equivalent CO_2 is notated as CO_2e. Therefore, the 25.7 pounds of N_2O has a CO_2e of 7,607.2 pounds[2]. Thus, the final equivalent CO_2 GHG load due to the demolition of the structures would be the sum of the N_2O plus CO_2, as shown in Table 3.1-2, or 8,617 CO_2e per day. Since demolition could occur for up to 120 days, the net CO_2e level due to onsite activities at the project site would be 1,034,040 pounds[3].

[2] 25.7 pounds X 296 = 7607.2 pounds
[3] 8,617 CO_2e/day X 120 days

Vehicle Emissions Due to Hauling

Motor vehicles are a secondary source of GHG emissions associated with the project. While the project does not propose and development that would result in long-term vehicle emissions, there are emissions associated with the haul truck and worker vehicles. A total of 1,900 vehicles and a trip length of 15 miles were assumed for this analysis. Hauling activity is assumed to take up to 180 days. Table 3.1-3 presents the vehicular emissions.

Again, since N_2O has a global warming potential of 296 with respect to CO_2, the 174.6 pounds of N_2O can be expressed as a CO_2e of 51,681.6 pounds[4]. Thus, the final equivalent CO_2 GHG load due to the hauling of the demolition material would be the contribution of N_2O and CO_2, as shown in Table 3.1-3, or 125,345.5 CO_2e per day[5]. Since hauling could occur for up to 180 days, the net CO_2e level due to onsite activities at the project site would be 15,041,460 pounds.[6]

The GHG emissions budget for the project would be the total of the CO_{2e} for the demolition and the hauling truck and vehicles. For this project, that would be 16,105,500pounds.[7] The local annual warming effect due to this level of project emissions was found to be 0.0011 F (0.0006 C). While there are no adopted thresholds of significance for the issue of GHG, an increase of 0.0011 F represents approximately one ten-thousandth of a degree. The net contribution of this amount on the planet as a whole is considered to be less than significant.

3.1.4 Cumulative Impact Analysis

According to the Greenhouse Gas/Global Warming Risk Assessment prepared by Investigative Science and Engineering, Inc. (Appendix H), the project's combined CO_2 equivalent emissions would correlate to an increase in surface air temperature of 0.0011F. While there are no standards or thresholds against which to compare this temperature change, the development of the project would be considered to have a significant cumulative impact if it would contribute to non-compliance with the state's attainment of Executive Order S-3-2005 goals. This Executive Order calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions by 2050.

Implementation of the project would not contribute to non-compliance with Executive Order S-3-2005. Aside from the short-term emissions associated with the demolition and hauling, the project would not result in any new development. Since the project does not propose any development and actually results in an overall reduction in vehicular emissions compared to the trips currently associated with the project site, the project result in a decrease of emissions and reduces the current contribution of emissions that could influence global climate change. Therefore, the project does not contribute to non-compliance with Executive Order S-3-2005 and no cumulative impacts are identified.

3.1.5 Conclusion

Based upon the analysis presented in this section, emissions from the project will not have a significant contribution to global climate change and no impact is identified.

[4] 174.6 pounds X 296 = 51,681.6 pounds
[5] 73,663.9 pounds + 51,681.6 pounds = 125,345.5 pounds
[6] 125,345.5 X 120 days = 15,041,460 pounds
[7] 1,034,040 pounds + 15,041,460 pounds = 16, 075,500 pounds

3.2 Effects Found Not Significant During Initial Study

The following environmental issue areas were determined to be less than significant during preparation of the Initial Study for the project.

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources (riparian or other sensitive habitats, federal and state protected wetlands, migratory fish and wildlife species, and local plans or ordinances). See Section 2.1 of the EIR for analysis of other biological resources issue areas.
- Cultural Resources (archaeological resources, paleontological resources, and human remains) See Section 2.2 of the EIR for analysis of historical resources.
- Geology and Soils
- Hazards and Hazardous Materials (accidental spills, hazardous materials near schools, hazardous materials on-site, proximity to public airport or private airstrip, interference with emergency response plan, wildfire risk, and exposure to vectors). See Section 2.3 of the EIR for analysis of hazardous materials issue areas.
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services, Utilities and Service Systems
- Recreation
- Transportation and Traffic

Table 3.1-1. Net Greenhouse Gas Emissions in 2004

Region	Carbon Dioxide Equivalent (CO_2e) (million metric tons)
California[1]	492
United States[2]	6,378.9

Notes:

[1] California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 – 2004. CEC-600-2006-013-SF. December 22, 2006. <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>.

[2] U.S. EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990 –2005, April 15, 2007. <http://www.epa.gov/climatechange/emissions/downloads06/07CR.pdf>.

Table 3.1-2. Demolition Equipment GHG Emissions Levels (pounds/day)

Equipment Classification	Quantity	Hours/ Day	CO	NO_x	CO_2	N_2O
Dozer – D8 CAT	2	6	21.6	55.2	583.2	16.6
Loader	2	6	12.2	17.8	329.4	5.3
Water Truck	1	6	3.6	12.6	97.2	3.8
Total			37.4	85.6	1009.8	25.7

Table 3.1-3. Hauling Truck and Vehicle GHG Emissions Levels (in pounds)

Vehicle Classification	Total Trips	CO_2	N_2O
Light Duty Autos	380	3622.7	1.3
Heavy Duty Autos	1520	70,041.2	173.3
Total	1900	73,663.9	174.6

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4.0 PROJECT ALTERNATIVES

An Environmental Impact Report (EIR) must describe and evaluate a "range of reasonable alternatives to the project, or to the location of the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project…." [State California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a)].

4.1 Rationale for Alternative Selection

Alternatives were selected for analysis based upon their ability to meet the requirements of CEQA and also for their ability to reduce the significant impacts identified for the project. Pursuant to State CEQA Guidelines Section 15126.6(e)(1), a No Project Alternative must be analyzed. The purpose of the No Project Alternative is to provide a comparison of the environmental impacts that would result if the project is approved with what would occur if the project was not approved.

The project would result in impacts to biological resources (sensitive species) and hazards and hazardous materials (routine transport, storage, use, or disposal of hazardous wastes) that can be mitigated to below a level of significance. Significant and unmitigated impacts are identified for cultural resources (historical resources). The alternatives chosen for analysis were selected based on their ability to reduce the significant impacts associated with implementation of the proposed project while still reasonably attaining the project objectives. The following objectives have been identified for the proposed project:

- Carry out the purpose and intent of Board Policy G-15 which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost.
- Eliminate risks of liability, particularly with regard to fire.
- Carry out the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility.
- Reduce maintenance costs to the County of San Diego for unoccupied buildings.

Alternatives were evaluated predominantly on their ability to reduce impacts to historical resources. The first priority in the alternatives analysis was to determine if it was feasible to avoid the impact; and thus, the No Project Alternative was evaluated. The No Project Alternative considered the impacts of what would happen environmentally if the buildings were not demolished and what, if any, beneficial uses the buildings could provide to best meet some of the project objectives. Thus, two scenarios for the No Project Alternative were evaluated. One scenario was considered in which the buildings were not demolished and no uses of the structures would occur. The second scenario under the No Project Alternative was to consider if the buildings are not demolished and could be reused.

The next phase in alternative development was looking at the project objectives and determining whether the impacts could be reduced while meeting some, if not all, of the project objectives. Thus, an alternative was developed reducing the number of buildings demolished. The selection of the buildings to be demolished focused on the age, potential for reuse and condition of the structures, and the reason the building was being proposed for historic significance. The older buildings were considered to have a higher priority for retention than the newer buildings. This is because the newer buildings did not contribute to multiple historical eras on the project site. Buildings that were determined to be significant from an architectural perspective were prioritized higher than those in which the building significance was associated with broad patterns of history. To meet the project objective of gaining some financial

return and reducing maintenance costs, it was assumed that the buildings retained would be reused. Thus, a Reduced Project/Adaptive Reuse Alternative was evaluated. The Reduced Project/Adaptive Reuse Alternative represents a reduction in the number of buildings to be demolished, retaining 11 on-site buildings and utilizing them for other uses.

The next phase of alternative development was to determine if it was feasible to consider relocating structures, allowing a greater proportion of the site to become available for future redevelopment under the City of Santee Town Center Specific Plan. Thus, a Relocation/Adaptive Reuse Alternative was considered. The Relocation/Adaptive Reuse Alternative would move five on-site buildings to an area surrounding the Polo Barn and rehabilitate these buildings in addition to Buildings 7-9 and 12.

A discussion on the structural and financial feasibility of the reduced impact alternatives is provided in the discussion below. In addition, impacts associated with each alternative are identified. Table 4.0-1 summarizes the impacts associated with each alternative and provides a comparison of the magnitude of impacts of each alternative to the proposed project.

One alternative was considered but rejected as infeasible. This was an adaptive reuse alternative whereby all on-site structures would be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation and utilized for other purposes. Pursuant to CEQA Guidelines Section 15064.5(b)(3), rehabilitation of all on-site structures in accordance with the Secretary of the Interior's Standards for Rehabilitation would reduce impacts to historical resources to below a level of significance. However, for this alternative, while it was determined to reduce the impacts to below a level of significance, costs would prove economically infeasible. As identified under Section 4.3, rehabilitation and reuse of 12 on-site structures would cost approximately $22.5 to 25 million, or approximately $2 million per building. This cost is associated with the upgrades that are required to bring the buildings up to applicable California Building Code (CBC), California Historical Building Code (CHBC)[1], and Americans with Disabilities Act (ADA) codes. Where applicable, the more flexible requirements of the CHBC were assumed for the cost estimating.

Assuming a cost of approximately $2 million per buildings, that costs associated with rehabilitation and reuse of 26 on-site structures could cost up to $52 million. This is above and beyond any revenues that could be generated from leasing out the renovated buildings on the site. Since this alternative was considered fiscally prohibitive, it was not evaluated further in the EIR.

4.2 Analysis of the No Project - No Reuse Alternative

4.2.1 No Project-No Reuse Alternative Description and Setting

Existing patients of the Edgemoor Geriatric Hospital are proposed to be transferred to a new skilled nursing facility located north of the project site in late 2008. At that time, the on-site hospital structures would no longer be occupied. The County has been working with the Santee Food Bank, which currently occupies some of the on-site structures to find alternative locations to operate.

[1] The California Historical Building Code provides regulations and standards for the rehabilitation, preservation, restoration (including related reconstruction) or relocation of historical buildings. The standards are intended to allow the restoration or change of occupancy so as to preserve the historical building's original or restored elements and features. The Code also encourages energy conservation and a cost effective approach to preservation; provides for reasonable safety from fire, seismic forces, or other hazards for occupants and users of historical buildings; and provides reasonable availability and usability by the physically disabled. In general, the California Historical Building Code provides flexibility in meeting code requirements.

Under the No Project – No Reuse Alternative, no structures on the project site would be demolished. The existing conditions for each environmental issue as described in Section 2 of the EIR would remain with no change. Under the No Project – No Reuse Alternative, the County would construct a fence surrounding the property to discourage unauthorized trespass onto the property or within the vacant on-site structures. Minimal maintenance would be conducted and the buildings would not be used for any purpose. It is anticipated that the County of San Diego would conduct sufficient maintenance to prevent/control termite and weather damage (i.e., exterior painting).

4.2.2 Comparison of the Effects of the No Project-No Reuse Alternative to the Proposed Project

The following presents a comparison of the impacts associated with implementation of the proposed project to biological resources, cultural resources (historical), hazards and hazardous materials, and transportation and traffic for the No Project–No Reuse. Transportation was added to the discussion of alternatives since there was a potential that reuse of the buildings could have an adverse effect to this issue area, whereas the Initial Study prepared concluded that impacts to transportation and traffic would not be significant for the proposed project.

Biological Resources

Under the No Project – No Reuse Alternative, biological resource conditions on-site would remain as identified in Section 2.1.1. This alternative would not involve demolition of any on-site structure; therefore, there would be no potential to impact sensitive biological resources such as sensitive bats or raptors. Although the proposed project identified mitigation measures to reduce potential impacts, the No Project – No Reuse alternative would avoid impacts to these biological resources. Therefore, impacts under the No Project – No Reuse Alternative would be less than under the proposed project.

Cultural Resources

No demolition would take place under the No Project –No Reuse Alternative. Since the on-site structures would be retained, the historical resources identified on-site would not be impacted. This alternative would result in no impact to historical resources. Compared to the proposed project, this alternative would avoid the impacts to cultural resources and would eliminate the significant and unmitigated impact identified for the proposed project.

Hazards and Hazardous Materials

No demolition would take place under the No Project – No Reuse Alternative; therefore, existing hazardous materials located on-site, such as asbestos-containing materials (ACM) or lead-based paint (LBP), would not be disturbed due to these activities. Under the No Project – No Reuse Alternative, these materials would remain in their present condition and they would not pose a threat to individuals in the area through routine transport, storage, use, or disposal. Since no demolition is proposed under the No Project – No Reuse Alternative, ACM and LBP would not be disturbed. Furthermore, a fence would be constructed surrounding the property to discourage trespass. Although the impacts associated with the demolition and transport of hazardous materials would be less, unoccupied buildings could create the hazard of an attractive nuisance for trespassers. Foreseeable events occurring as a result of unauthorized entry to unoccupied buildings could include personal injury, property damage, fire, and vandalism. The buildings would pose a public heath and safety hazard due to the presence of asbestos containing materials (ACM) or lead-based paint (LBP). If the buildings are abandoned and no longer maintained, the

risk of exposure to ACM or LBP would be difficult to monitor and the unknowing public could accidentally be exposed to these substances. Therefore, hazards and hazardous material impacts for the No Project – No Reuse Alternative could result in an increased impact compared to the proposed project.

Transportation and Traffic

Project-related impacts to transportation and traffic were eliminated from consideration based on the Initial Study (Appendix A). Similar to the proposed project, implementation of the No Project – No Reuse Alternative would not generate any long-term traffic and, since no tenants or other uses would be located on-site and no traffic generated once the buildings have been vacated.

Objectives

Assuming all current patients and staff at the Edgemoor Geriatric Hospital are relocated to the new Skilled Nursing Facility, if the No Project – No Reuse alternative is implemented, the on-site buildings would remain unoccupied. This alternative would not meet any of the identified project objectives. Specifically, it would not carry out the purpose and intent of Board Policy G-15 which seeks to maintain safe, functional and aesthetically pleasing public property at a reasonable cost. This alternative would not eliminate risks of liability, particularly with regard to vandalism and fire. Additionally, it would not carry out the purpose and intent of Board Policy F-38 which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. Nor would this alternative reduce maintenance costs to the County of San Diego for unoccupied buildings.

4.3 No Project-Reuse Alternative Description and Setting

Under the No Project – Reuse Alternative, the on-site structures would not be demolished and would instead be reused with minimal rehabilitation activities. Although substantial rehabilitation would not occur under the No Project – Reuse Alternative, reuse of the structures would require modifications to meet current applicable California Building Code (CBC), California Historical Building Code (CHBC), and Americans with Disabilities Act (ADA) codes. Where applicable, the more flexible requirements of the CHBC were assumed. All upgrades would be required to be consistent with all applicable historic standards, including the Secretary of the Interior's Standards for Rehabilitation.

The types of improvements to the buildings that would be required for reuse vary among the buildings, but many items/systems would need to be corrected to both the exterior and interior of the buildings. These improvements could include windows retrofitting or replacement with dual-glazing for energy conservation. Exterior cement plaster walls in poor condition would need to be repaired. Many of the current concrete entry ramps do not meet updated ADA requirements or CHBC alternatives. Therefore these ramps would need to be removed and replaced with updated ADA ramps and railings. The existing stairs would need to be removed and designed to work with the new ramp. On the building interiors, all flooring would be replaced, the plaster walls would be patched, repaired and painted as needed, all wood doors should be replaced with new doors (and ADA-compliant hardware) and the ceilings would be removed and replaced with gypsum board. While the ceiling area is exposed, the new updated fire sprinkler system would be placed up in the attic area. New common ADA-compliant restrooms would need to be added. Additional improvements related to heating, venting and air conditions would be required as well as structural improvements to meet either CHBC or CBC requirements.

Under this alternative, the existing conditions for each environmental issue as described in Section 2 of the EIR would remain.

4.3.1 Comparison of the Effects of the No Project-Reuse Alternative to the Proposed Project

The following presents a comparison of the impacts associated with implementation of the proposed project to biological resources, cultural resources (historical), hazards and hazardous materials, and transportation and traffic for the No Project- Reuse Alternative. An analysis of transportation was added to the discussion of alternatives since there was a potential that reuse of the buildings could have an adverse effect to this issue area, whereas the Initial Study prepared concluded that impacts to transportation and traffic would not be significant for the proposed project.

Biological Resources

Under the No Project – Reuse Alternative, biological resource conditions on-site would remain as identified in Section 2.1.1. This alternative would not demolish any on-site structure; therefore, there would be no potential to impact sensitive biological resources such as raptors. However, activities associated with bringing all on-site structures up to code could potentially impact sensitive bats located within Building 12, if it was reused. Therefore, mitigation similar to that identified for the proposed project, including avoiding impacts to material colonies or roosts would be required to reduce impacts to below a level of significance. Therefore, impacts under the No Project – Reuse Alternative would be substantially similar to those identified for the proposed project as related to sensitive bats. Impacts to raptors would not occur.

Cultural Resources

No demolition would take place under the No Project – Reuse Alternative. Since the on-site structures would be retained, the historical resources identified on-site would not be impacted. Reuse of the on-site structures would require updating to meet current applicable CBC, CHBC, and ADA codes and it has been assumed that these improvements would be consistent with the Secretary of the Interior's Standards for Rehabilitation. Implementation of this alternative would result in a less than significant impact to historical resources. Compared to the project, this alternative would decrease the overall level of impacts to cultural resources and would eliminate the significant and unmitigated impact.

Hazards and Hazardous Materials

No demolition would take place under the No Project – Reuse Alternative; therefore, existing hazardous materials located on-site, such as ACM or LBP, would not be disturbed due to these activities. Should reuse of the on-site structures occur, implementation of required CBC, CHBC, and ADA upgrades has the potential to disturb on-site ACM or LBP. Mitigation similar to that identified for the proposed project including proper handling or disposal of ACM or LBP would be required to reduce impacts to below a level of significance. Hazard and hazardous materials impacts under the No Project – Reuse Alternative would be similar to the proposed project with the exception of potential impacts resulting from unauthorized/illegal activities.

Transportation and Traffic

Project-related impacts to transportation and traffic were eliminated from consideration based on the Initial Study (Appendix A). Implementation of the No Project – Reuse Alternative would likely generate increased transportation and traffic impacts, as new tenants would be located on-site If the project site is developed according the City of Santee Town Center Specific Plan and subsequent Riverview

Amendment, the project site could be developed as a combination of institutional, office, research or financial institution type uses. Trip generation for the institutional uses would depend on the type of institutional use that was developed. According to traffic generation rates included in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* prepared by the San Diego Association of Governments trip generation could range anywhere from 120/acre for a two-year college/technical school to 300/acre for low-rise office. Therefore, traffic generation under the reuse alternative would be greater than the proposed project, as the proposed project does not propose any new uses. If this alternative is selected, additional environmental review would be necessary.

Objectives

Depending on the use of the on-site structures, implementation of the No Project – Reuse Alternative would meet some of the identified project objectives.

If the buildings were reused for public uses, such as an historic park or County facility, the No Project – Reuse Alternative would meet some of the project objectives. Long-term reuse of the on-site structures would require bringing the buildings up to current applicable CBC, CHBC, and ADA codes, thereby eliminating a public health and safety hazard associated with ACM and LBP. Furthermore, reuse of the buildings would eliminate an attractive nuisance, as the structures would be occupied. Reuse of the on-site structures for public uses would still require the County to pay maintenance costs for the buildings, however the buildings would be occupied. However, if the buildings were reused for public purposes, revenue would not be generated to support the new skilled nursing facility. Therefore, if reused for public uses, the No Project – Reuse Alternative would meet all project objectives with the exception of maximizing revenue generation to support the new skilled nursing facility in accordance with Board of Supervisors Policy F-38.

Public uses could include using the site as an historic park or for County offices. It may not be practicable to use the site as an historic park. Some of the issues that would need to be considered include the following:

- There already exists a 55-acre multi-purpose community recreational park proximate to the site within the Santee Town Center area.
- There has not been a demonstrated broad public interest in the history of modern rehabilitative care to warrant the development of an historic park.
- There could be some public interest in the history of polo in the United States; however, the components of the project site that retain significance in relation to the development of polo include only six buildings. Therefore, development of a stand-alone park dedicated to the history of polo is not practical.

From a practical standpoint, the Edgemoor site is not highly conducive to providing services to the general public or for use by the County for office space. Some of the concerns include the following:

- There are no identified needs in the County of San Diego Capital Improvements Needs Assessment (CINA). CINA is a county-wide summary of near- and long-term (five-year time frame) capital improvements/facilities that are needed for various County Departments to enhance or improve their services to the public.

- The project site is not located within proximity to other County services (which are concentrated in Kearny Mesa and Downtown San Diego) or in an area with a dense population, as compared to the rest of the County.

If private uses, such as residential or commercial tenants, were to occupy the rehabilitated buildings, the No Project – Reuse Alternative could meet some of the project objectives. Specifically, long-term reuse of the on-site structures would require bringing the buildings up to current applicable CBC, CHBC, and ADA codes, thereby eliminating a public health and safety hazard. Furthermore, reuse of the buildings would eliminate an attractive nuisance for vandalism and arson, as the structures would be occupied and would be generally consistent with Board Policy G-15. Reuse of the buildings by private tenants would provide a limited source of revenue to assist with maintenance costs as well as support the new skilled nursing facility; however it would not maximize the revenues. Some of the other potential constraints and limiting factors associated with this alternative include:

- The small building size and sprawling configuration of the on-site buildings is more attractive to smaller tenants. Smaller tenants have higher turnover rates due to the potential for growth and associated need for larger space. High turnover rates correspond to higher vacancy rates.
- The on-site apartments would not be viable to use as housing for the general public because amenities such as kitchens are lacking.
- No rehabilitation activities would occur; therefore, it is unlikely the buildings would capture a high rent value.

Therefore, the No Project – Reuse Alternative would meet some identified project objectives if reused for private uses.

4.4 Analysis of the Reduced Project/Adaptive Reuse Alternative

4.4.1 Reduced Project/Adaptive Reuse Alternative Description and Setting

The goal of the Reduced Project/Adaptive Reuse Alternative would be to reduce impacts to historical resources. This alternative would preserve the historical setting of the site by retaining and rehabilitating Buildings 2-4, 6-9, 12, 14-15, and 18 for other uses. These buildings were selected for salvage and reuse primarily due to their age and architectural significance, but also because they form an historic core for the site, representing buildings from the Dairy and Polo Pony Farm and Edgemoor Farm San Diego County Home for the Aged and Indigent historic districts (see Section 2.2 for a discussion of historical resources on-site). All other on-site structures would be demolished (Figure 4.3-1).

None of the buildings proposed for demolition under this alternative were included in the listing of the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district on the California Register of Historical Resources (California Register) in 1987. The buildings included in the Geriatric Hospital were considered less significant because they were newer building compared to those proposed for preservation from the Dairy, Polo Pony Farm, and Edgemoor Farm San Diego County Home for the Aged and Indigent historic districts. The Dairy and Polo Pony Farm and Edgemoor Farm San Diego County Home for the Aged and Indigent historic districts had greater architectural importance compared to the Geriatric Hospital buildings. As newer buildings, those associated with the Geriatric Hospital did not contribute to multiple eras of use on the project site. In addition, the architecture associated with the other two districts was more important from the perspective that many of those buildings were designed

by a Master Architect. Once rehabilitated, the buildings would be available for reuse. Potential uses for the buildings may include specialty retail, office, or research and development uses.

Demolition and removal of the following would occur under the Reduced Project/Adaptive Reuse Alternative:

- 15 buildings and foundations (Buildings 1, 5, 11, 13, 16-17, and 19-27);
- Concrete walkways, curbs, and walls;
- Some site lighting (e.g., around buildings);
- Landscaping near the buildings (with the exception of the oak trees) that is incidental to building demolition.

Similar to the proposed project, underground irrigation, piping, plumbing, and electrical systems for all buildings demolished would be properly capped and plugged below grade. Underground irrigation, piping, plumbing, and electrical systems for all buildings not demolished would be retained. Rehabilitation of the remaining structures would occur in accordance with the Secretary of the Interior's Standards for Rehabilitation. In addition, reuse of the structures would require updating to meet current applicable CBC, CHBC, and ADA codes. The types of improvements to the buildings that would be required for reuse vary among the buildings, but many items/systems would need to be corrected to both the exterior and interior of the buildings. These improvements could include windows retrofitting or replacement with dual-glazing for energy conservation. Exterior cement plaster walls in poor condition would need to be repaired. Many of the current concrete entry ramps do not meet updated ADA requirements or CHBC alternatives. Therefore these ramps would need to be removed and replaced with updated ADA ramps and railings. The existing stairs would need to be removed and designed to work with the new ramp. On the building interiors, all flooring would be replaced, the plaster walls would be patched, repaired and painted as needed, all wood doors should be replaced with new doors (and ADA-compliant hardware) and the ceilings would be removed and replaced with gypsum board. While the ceiling area is exposed, the new updated fire sprinkler system would be placed up in the attic area. New common ADA-compliant restrooms would need to be added. Additional improvements related to heating, venting and air conditions would be required as well as structural improvements to meet either CHBC or CBC requirements.

The rehabilitated buildings were considered for public uses (such as County services) and private users.

4.4.2 Comparison of the Effects of the Reduced Project/Adaptive Reuse Alternative to the Proposed Project

The following presents a comparison of the impacts associated with implementation of the proposed project to biological resources, cultural resources (historical), hazards and hazardous materials, and transportation and traffic for the Reduced Project/Adaptive Reuse Alternative scenario (public and private use). Transportation was added to the discussion of alternatives since there was a potential that reuse of the buildings could have an adverse effect to this issue area, whereas the Initial Study prepared concluded that impacts to transportation and traffic would not be significant for the proposed project. In addition, the structural and financial feasibility of rehabilitation and reuse of the on-site structures under the Reduced Project/Adaptive Reuse Alternative is discussed below.

Biological Resources

Under the Reduced Project/Adaptive Reuse Alternative, biological resource conditions on-site would remain as identified in Section 2.1.1. The demolition of 14 on-site structures and extensive rehabilitation activities associated with bringing 12 buildings up to code may potentially impact sensitive bats located within the structures, as bat sign was identified within Buildings 12. In addition, similar to the proposed project, these activities could impact raptors if demolition activities were to occur within 300 feet of an occupied nest during the raptor nesting season. Mitigation identical to that identified for the proposed project would be required to reduce potential impacts to these resources to less than significant levels through avoidance. When compared to the project, this alternative would result in impacts that would be substantially similar to those identified for the proposed project as related to raptors and sensitive bats.

Cultural Resources

Implementation of the Reduced Project/Adaptive Reuse Alternative would not substantially impact any of the structures officially included on the National or California Register or any of the structures identified as important contributors to the Dairy and Polo Pony Farm-era historic district, as these structures would remain in their present location, be rehabilitated, and adaptively reused. However, a majority of the buildings comprising the potential Geriatric Hospital-era historic district would be demolished. In addition, three of the 15 buildings that comprise the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district would also be demolished under this alternative. [2]

As identified in Section 2.2, Cultural Resources, Buildings 1, 13, 16, 17, and 21-25 are components of a potential Geriatric Hospital-era historic district. Building 20 (the microfilm storage bunker) would also be demolished under this alternative, but, as an unassociated County of San Diego facility, this structure has no to low historical significance. The buildings comprising the potential Geriatric Hospital-era historic district are eligible for state listing under Criterion A for representing a pattern in the development of publicly-funded nursing and rehabilitation care and ultimately the facility's transition to a pioneering institution in the field of geriatrics and Criterion C for associated architectural designs based on current concepts of Modern Architecture.

The buildings comprising the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district (Buildings 2-4, 6-10, 12, 14-15, 18-19, and 26-27) are eligible for listing under a combination of Criterion A for their association with the establishment and development of pre-New Deal concepts of social welfare and institutions for the care and treatment of the dependent poor in California, Criterion B for their association with Walter Dupee, and Criterion C for embodying the distinctive characteristics of a type, period, and method of construction and for representing the work of recognized Master Architects.[3]

In accordance with CEQA Guidelines Section 15064.5(b)(3), rehabilitation of the on-site structures in accordance with the Secretary of the Interior's Standards for Rehabilitation would reduce potential impacts to the rehabilitated buildings to less than significant levels. However, mitigation similar to that identified for the proposed project for impacts to the demolished buildings would apply to the Reduced Project/Adaptive Reuse Alternative. This mitigation includes Historic American Building Survey (HABS) documentation and development of an interpretive site model and display. Similar to the proposed project, incorporation of the proposed mitigation would reduce, but not eliminate, impacts to the

[2] It should be noted that the three Poor Farm-era buildings that would be impacted under this alternative (Buildings 19, 26, and 27) were not officially listed on the California Register; however, they were deemed eligible contributors to the district (See Section 2.2 and Appendix C).

two buildings that would be demolished under this alternative that are associated with the Edgemoor Farm San Diego County Home for the Aged and Indigent historic district as well as the buildings comprising the Geriatric Hospital era historic district. Therefore, compared to the project, this alternative would result in fewer impacts to cultural resources than the proposed project. However, similar to the proposed project, impacts to the 14 buildings would remain significant and unmitigated.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts resulting from implementation of the Reduced Project/Adaptive Reuse Alternative would be identical to those resulting from the proposed project. Due to the age of the structures that would be demolished and reused (ranging from 1913 to 1961), existing ACM or LBP may be present on-site. Therefore, adoption of this alternative would require mitigation for potential impacts resulting from disturbance of these materials. These measures include proper handling or disposal of ACM or LBP. Similar to the proposed project, this mitigation would reduce impacts to hazards and hazardous materials to below a level of significance. Therefore, impacts to hazards and hazardous materials resulting from implementation of the Reduced Project/Adaptive Reuse Alternative would be mitigated to below a level of significance. Compared to the proposed project, implementation of this alternative would result in similar impacts to hazards and hazardous materials.

Transportation and Traffic

Project-related impacts to transportation and traffic were eliminated from consideration based on the Initial Study (Appendix A); however, implementation of the Reduced Project/Adaptive Reuse Alternative would likely generate increased transportation and traffic impacts If the project site is developed with uses that are identified City of Santee Town Center Specific Plan and subsequent Riverview Amendment, the project site could be developed as a combination of institutional, office, research or financial institution type uses. Trip generation for the institutional uses would depend on the type of institutional use that was developed. According to traffic generation rates included in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* prepared by the San Diego Association of Governments trip generation could range anywhere from 120/acre for a two-year college/technical school to 300/acre for low-rise office. Therefore, traffic generation under the reuse alternative would be greater than the proposed project, as the proposed project does not propose any new uses. If this alternative is selected, additional environmental review would be necessary.

Objectives

Public Use

If the rehabilitated buildings were reused for public uses, the Reduced Project/Adaptive Reuse Alternative would meet some of the project objectives. This alternative would either reuse the on-site structures which would require bringing the buildings up to current applicable CBC, CHBC, and ADA codes or demolish them, thereby eliminating a public health and safety hazard. In addition, according to a building and structural assessment prepared by Matalon Architecture & Planning (May 2008) (Appendix E), substantial upgrades would be required to correct the following deficiencies and bring the buildings up to code:

- Age-related deficiencies such as cracking and spalling of the exterior stucco and water damage in the interiors.
- Exterior cladding is deteriorated with potential mold risk.

- Insulation is substandard.
- The fire sprinkler systems are out of date and do not provide current code coverage.
- Many buildings are structurally or seismically deficient.
- Foundations are deteriorated.
- Building system components, including electrical wiring, plumbing, and windows are beyond their useful life.

Reuse of the buildings would eliminate an attractive nuisance, as the structures would be occupied. With building occupancy, vandalism and potential arson risks would be reduced and would be consistent with the intent of Board Policy G-15. Reuse of the on-site structures for public uses would still require the County to pay maintenance costs for the buildings; however, the buildings would be occupied. In addition, maintenance costs would be reduced, as some of the on-site structures would be proposed for demolition under the Reduced Project/Adaptive Reuse Alternative. However, if the buildings were reused for public purposes, revenues would not be maximized to support the new skilled nursing facility. In addition, there are no identified facility or improvement needs in the CINA that are funded or planned for the Santee area. If reused for public uses, the Reduced Project/Adaptive Reuse Alternative would meet all project objectives with the exception of maximizing revenues to support the new skilled nursing facility in accordance with Board of Supervisors Policy F-38.

Private Use

If private uses were to occupy the rehabilitated buildings, the Reduced Project/Adaptive Reuse Alternative could meet some of the project objectives. Specifically, reuse of the on-site structures would require bringing the buildings up to current applicable CBC, CHBC, and ADA codes or demolishing them, thereby eliminating a public health and safety hazard. Furthermore, reuse of the buildings would eliminate an attractive nuisance, as the structures would be occupied. With building occupancy, vandalism and potential arson risks would be reduced and the intent of Board Policy G-15 would be met. However, as discussed below, rehabilitation and reuse of the buildings by private tenants would not carry out the purpose and intent of Board Policy F-38, which includes a goal of maximizing revenue generation to support the new Edgemoor Skilled Nursing Facility. The following discusses the costs associated with rehabilitating and adaptively reusing some of the on-site structures.

The building and structural assessment prepared by Matalon Architecture & Planning determined the structural integrity of the on-site structures and provided a cost estimate for the rehabilitation of the structures (Appendix E). The assessment analyzed five representative structures (Buildings 2, 3, 8, 16, and 19).[4] Conclusions from these structures are applicable to the remaining 22 structures that were not analyzed. Assumptions for the structures not analyzed were made based on similarities in age, size, and conditions of the structures. Table 4.4-1 presents a summary of the following:

- The buildings evaluated;
- Other buildings that are representative of the findings for each building evaluated;

[4] Structures were selected based on size (at least 3,000 square feet) and age (both historic and modern buildings were selected) in order to provide a sample cost for buildings of varying conditions. Similar buildings were eliminated from further consideration; however, conclusions based on the representative structures are applicable to the other on-site structures.

- The construction date for each buildings;
- Square footage of each building;
- Overall building conditions; and
- Safety characteristics of the buildings as they relate to rehabilitation activities.

Costs have been estimated for the upgrades required for each building, namely exterior repairs and bringing the buildings up to applicable ADA, CBC, and CHBC codes. Where applicable, the more flexible requirements of the CHBC were assumed for the cost estimating. All upgrades and repairs would conform to the Secretary of the Interior's Standards for Rehabilitation. Table 4.4-2 summarizes the cost to rehabilitate each representative structure. It should be noted that the building and structural assessment provided the base cost estimate for rehabilitation and a limited amount of costs related to the direct rehabilitation of the five representative buildings. These costs were applied to Buildings 4, 6-7, 9, 12, 14-15, and 18. The detailed estimate can be found in Appendix E.

A Financial Feasibility Analysis was prepared by Keyser Marston Associates, Inc. (May 2008) to determine the feasibility of specialty retail, office, or research and development uses as potential tenants of the rehabilitated buildings (Appendix G). The total estimate of rehabilitation costs in the Financial Feasibility Analysis was based on the base cost estimates as provided in the building and structural assessment prepared by Matalon Architecture & Planning. Additional direct and indirect costs associated with typical rehabilitation projects were applied to the base cost estimates. The analysis considered the potential net operating income for each potential use and compared this with the estimated cost of rehabilitation of the on-site structures to determine financial feasibility. As shown in Table 4.4-3, it was determined that the costs of rehabilitation outweigh the potential rent revenue by approximately $25 million for general commercial use (see Alternative 1, Appendix G). For specialty retail uses, the costs of rehabilitation outweigh the potential rent revenue by approximately $22.5 million (see Alternative 2, Appendix G). While specialty retail uses were determined to be more economical than general commercial uses, the costs of rehabilitation would far exceed the revenue generated from the buildings if they were to be reused.

4.5 Analysis of the Relocation/Adaptive Reuse Alternative

4.5.1 Relocation/Adaptive Reuse Alternative Description and Setting

The goal of the Relocation/Adaptive Reuse Alternative would be to reduce impacts to historical resources. This alternative evaluated relocating buildings and adaptive reuse clustering the historic buildings and allowing the future redevelopment of the remainder of the property. This alternative would move Buildings 2-3, 6, and 14-15 to an on-site location surrounding the Polo Barn. Buildings 7-9 and 12 would remain in place, as they are currently located adjacent to the Polo Barn. Buildings 1, 4-5, 11, 13, and 16-27 would be demolished under this alternative. Similar to the Reduced Project/Adaptive Reuse Alternative, Buildings 2-3, 6-9, 12, and 14-15 were selected for reuse because they are architecturally significant and form an historic core of the site, representing buildings from both the Dairy and Polo Pony Farm and Edgemoor Farm San Diego County Home for the Aged and Indigent historic districts. Furthermore, it was determined that these buildings were structurally feasible to be relocated without compromising their integrity. All other on-site structures would be demolished (Figure 4.3-1). Once the buildings are relocated, rehabilitation of the structures would be required. Rehabilitation of the buildings would occur in accordance with the Secretary of the Interior's Standards for Rehabilitation. Adaptive reuse of the relocated structures would also occur under this alternative, at which point the buildings

would need to be updated to meet current applicable CBC, CHBC, and ADA codes. Where applicable, the more flexible requirements of the CHBC were assumed for the improvements. The types of improvements to the buildings that would be required for relocation and reuse vary among the buildings, but many items/systems would need to be corrected to both the exterior and interior of the buildings. These improvements could include windows retrofitting or replacement with dual-glazing for energy conservation. Exterior cement plaster walls in poor condition would need to be repaired. Many of the current concrete entry ramps do not meet updated ADA requirements or CHBC alternatives. Therefore these ramps would need to be removed and replaced with updated ADA ramps and railings. The existing stairs would need to be removed and designed to work with the new ramp. On the building interiors, all flooring would be replaced, the plaster walls would be patched, repaired and painted as needed, all wood doors should be replaced with new doors (and ADA-compliant hardware) and the ceilings would be removed and replaced with gypsum board. While the ceiling area is exposed, the new updated fire sprinkler system would be placed up in the attic area. New common ADA-compliant restrooms would need to be added. Additional improvements related to heating, venting and air conditions would be required as well as structural improvements to meet either CHBC or CBC requirements. New foundations for the relocated buildings would also be required.

The relocated buildings were considered for public uses including County services and, alternatively, private users. The structural and financial feasibility of rehabilitation and reuse of the on-site structures under the Relocation/Adaptive Reuse Alternative is discussed below.

4.5.2 Comparison of the Effects of the Relocation/Adaptive Reuse Alternative to the Proposed Project

The following presents a comparison of the impacts associated with implementation of the proposed project to biological resources, cultural resources (historical), hazards and hazardous materials, and transportation and traffic for the Relocation/Adaptive Reuse Alternative (public and private use). Transportation was added to the discussion of alternatives since there was a potential that reuse of the buildings could have an adverse effect to this issue area, whereas the Initial Study prepared concluded that impacts to transportation and traffic would not be significant for the proposed project.

Biological Resources

Under the Relocation/Adaptive Reuse Alternative, biological resource conditions on-site would remain as identified in Section 2.1.1. The relocation of five structures, rehabilitation of nine structures, and demolition of 17 on-site structures as well as extensive rehabilitation activities and activities associated with bringing the buildings up to code may potentially impact sensitive bats located within the structures or raptors nesting in the on-site trees or buildings. Therefore, mitigation similar to that identified for the proposed project would be required to reduce potential impacts to less than significant levels. When compared to the project, this alternative would have a similar level of impact to biological resources including raptors and sensitive bats.

Cultural Resources

The on-site structures represent three significant historical districts. The buildings comprising the Dairy and Polo Pony Farm-era historic district (Buildings 4, 7-9, 10, and 12) are eligible for listing under Criterion B for their direct connection to Walter Dupee and represent the infrastructure of his regionally-, nationally-, and internationally-recognized commercial dairy and polo pony ranching operations. The buildings comprising the Edgemoor Farm San Diego County Home for the Aged and Indigent historic

district (Buildings 2-4, 6-10, 12, 14-15, and 18) are eligible for listing under a combination of Criterion A for their association with the establishment and development of pre-New Deal concepts of social welfare and institutions for the care and treatment of the dependent poor in California, Criterion B for their association with Walter Dupee, and Criterion C for embodying the distinctive characteristics of a type, period, and method of construction and for representing the work of recognized Master Architects. The buildings comprising the potential Geriatric Hospital-era historic district (Buildings 1, 13, 16-17, and 21-25) are eligible for listing under Criterion A for representing a pattern in the development of publicly-funded nursing and rehabilitation care and ultimately the facility's transition to a pioneering institution in the field of geriatrics and Criterion C for its associated architectural designs based on current concepts of Modern Architecture (Figure 1.2-1).

As identified above, Buildings 2-3, 6, and 14-15 would be relocated to an on-site location surrounding the Polo Barn and rehabilitated under this alternative. While the on-site buildings would be relocated and structurally preserved, according to the United States Department of the Interior, "the actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved" (DOI, 1990). Furthermore, movement of a property outside of its period of significance is considered to degrade the integrity of its historical significance. All buildings on-site were constructed at their current locations, and have remained in place, except Building 4, which was relocated during the 1920s. Building 4 retains significance from 1913-1949, spanning two historical contexts. Because it was relocated from a nearby, on-site location during its period of significance, Building 4 retains full integrity of location, as do all other on-site structures. Considering the fact that the buildings would be relocated within the same general property, relocation as proposed under this alternative is not considered to significantly diminish the integrity of the buildings. The fact that the buildings may be configured or arranged differently than in their current location would not diminish the integrity of the buildings. The fact that the buildings are kept together is more critical than that the buildings retain their specific orientation to each other. Preserving and rehabilitating Buildings 2-3, 6-9, 12, and 14-15 would slightly compromise the historic integrity of the structures. Demolition of Buildings 1, 4-5, 11, 13, and 16-27 would generate significant impacts.

Mitigation similar to that identified for the proposed project would apply to the Relocation/Adaptive Reuse Alternative. This mitigation includes HABS documentation and development of an historic interpretive site model and display. Similar to the proposed project, incorporation of mitigation would reduce, but not eliminate, impacts to those structures comprising the Dairy and Polo Pony Farm, Edgemoor Farm San Diego County Home for the Aged and Indigent-era, and Geriatric Hospital era historic districts. Impacts would remain significant and unmitigated. Compared to the proposed project, this alternative would result in slightly reduced, but similar, impacts to cultural resources.

Hazards and Hazardous Materials

Hazards and hazardous material impacts resulting from implementation of the Relocation/Adaptive Reuse Alternative would be similar to those resulting from the proposed project. Due to the age of the structures that would be relocated (ranging from 1913 to 1926), adoption of the Relocation/Adaptive Reuse Alternative would require mitigation for potential impacts resulting from disturbance of ACM or LBP. In addition, mitigation measures would need to be incorporated to reduce impacts associated with ACM or LBP during demolition activities. These measures include proper handling or disposal of ACM or LBP. Similar to the proposed project, this mitigation would reduce impacts to hazards and hazardous materials to below a level of significance. Therefore, impacts to hazards and hazardous materials resulting from implementation of the Relocation/Adaptive Reuse Alternative would be mitigated to below a level of

significance. Compared to the proposed project, implementation of this alternative would result in similar impacts to hazards and hazardous materials.

Transportation and Traffic

Project-related impacts to transportation and traffic were eliminated from consideration based on the Initial Study (Appendix A); however, implementation of the Relocation/Adaptive Reuse Alternative would likely generate increased transportation and traffic impacts. The magnitude of the impacts is unknown without specifying the type of land uses. If the project site is developed according the City of Santee Town Center Specific Plan and subsequent Riverview Amendment, the project site could be developed as a combination of institutional, office, research or financial institution type uses. Trip generation for the institutional uses would depend on the type of institutional use that was developed. According to traffic generation rates included in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* prepared by the San Diego Association of Governments trip generation could range anywhere from 120/acre for a two-year college/technical school to 300/acre for low-rise office. Therefore, traffic generation under the reuse alternative would be greater than the proposed project, as the proposed project does not propose any new uses. If this alternative is selected, supplemental environmental review would be necessary.

Objectives

Public Use

If the rehabilitated buildings were reused for public uses, the Relocation/Adaptive Reuse Alternative would meet some of the project objectives. The reuse of some of the on-site structures and demolition of others would eliminate the public health and safety hazard. In addition, according to a building assessment prepared by Matalon Architecture & Planning (Appendix E), substantial upgrades would be required to correct the following deficiencies:

- Age-related deficiencies such as cracking and spalling of the exterior stucco and water damage in the interiors.
- Exterior cladding is deteriorated with potential mold risk.
- Insulation is substandard.
- The fire sprinkler systems are out of date and do not provide current code coverage
- Many buildings are structurally or seismically deficient.
- Foundations are deteriorated.
- Building system components, including electrical wiring, plumbing, and windows are beyond their useful life.

Reuse of the buildings would eliminate an attractive nuisance, as the structures would be occupied. With building occupancy, vandalism and potential arson risks would be reduced and would be consistent with the intent of Board Policy G-15. Reuse of the on-site structures for public uses would still require the County to pay maintenance costs for the buildings, however the buildings would be occupied. In addition, maintenance costs would be reduced, as some of the on-site structures would be proposed for demolition under the Relocation/Adaptive Reuse Alternative. However, if the buildings were reused for public purposes, revenue generation would not be maximized to support the new skilled nursing facility.

In addition, there are no identified facility or improvement needs in the CINA that are funded or planned for the Santee area. If reused for public uses, the Relocation/Adaptive Reuse Alternative would meet all project objectives with the exception of generating revenue to support the new skilled nursing facility in accordance with Board of Supervisors Policy F-38.

Private Use

If private uses were to occupy the rehabilitated buildings, the Relocation/Adaptive Reuse Alternative could meet some of the project objectives. Specifically, reuse of some of the on-site structures and demolition of others would eliminate a public health and safety hazard. Furthermore, reuse of the buildings would eliminate an attractive nuisance, as the structures would be occupied. However, as discussed below, relocation and reuse of the buildings by private tenants would not ensure a source of revenue to assist with maintenance costs as well as support the new skilled nursing facility in accordance with Board of Supervisors Policy F-38. The following discusses the costs associated with relocating and adaptively reusing some of the on-site structures.

A building and structural assessment was prepared by Matalon Architecture & Planning (May 2008) to review the structural integrity of the on-site structures and provide a cost estimate for the rehabilitation of the structures (Appendix E). The potential for relocation of the structures was also assessed. The assessment analyzed five representative structures (Buildings 2, 3, 8, 16, and 19). Table 4.5-1 identifies the characteristics of the buildings as they relate to relocation activities.

The estimated cost associated with relocation and rehabilitation of the representative structures is presented in Table 4.5-2, and includes costs associated with construction of new foundations for the relocated buildings, the lift and movement of the structures, and bringing the structures up to applicable CBC, CHBC, and ADA code (see Section 4.3 for an assessment of rehabilitation of the structures). Conclusions from the representative structures are applicable to the remaining 22 structures that were not analyzed. Assumptions for the structures not analyzed were made based on similarities in age, size, and condition (see Table 4.4-1). All rehabilitation activities would conform to the Secretary of the Interior's Standards for Rehabilitation. Table 4.5-2 summarizes the cost to rehabilitate and relocate each representative structure. It should be noted that the building and structural assessment provided the base cost estimate for relocation and rehabilitation and a limited amount of costs related to the direct relocation and rehabilitation of the five representative buildings. These costs were applied to Buildings 6-7, 9, 12, and 14-15. The detailed estimate can be found in Appendix E.

A Financial Feasibility Analysis was prepared by Keyser Marston Associates, Inc. (May 2008) to determine the feasibility of specialty retail, office, or research and development uses as potential tenants of the rehabilitated buildings (Appendix G). Relocation of the on-site structures was also considered. The total estimate of relocation and rehabilitation costs in the Financial Feasibility Analysis was based on the base cost estimates as provided in the building and structural assessment prepared by Matalon Architecture & Planning. Additional direct and indirect costs associated with typical relocation and rehabilitation projects were applied to the base cost estimates. In addition to the estimate to relocate and rehabilitate the on-site structures, the potential for construction of office/research and development or mixed-use residential uses was included to determine economic viability. As identified in Section 4.3.2, it was determined that specialty retail uses were more economical as future tenants of the structures than general commercial uses. As shown in Table 4.5-3, it was determined that the costs of rehabilitation outweigh the potential rent revenue by approximately $17.7 million for the new office/research and development uses (in addition to adaptively reusing the relocated structures for specialty retail uses) (see Alternative 3, Appendix G). The cost of rehabilitation of the site for a mixed-use residential development

(in addition to adaptively reusing the relocated structures for specialty retail uses) was estimated to outweigh the potential rent revenue by approximately $17 million (see Alternative 4, Appendix G). While it was determined that construction of new mixed-use residential uses (in addition to adaptively reusing the relocated structures for specialty retail uses) would be more economical than construction of new office/research and development uses, the costs of relocation and rehabilitation far exceed the revenue generated from the buildings if they were to be reused.

4.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that the Environmentally Superior Alternative be identified. A summary and comparison of the impacts for each issue area and alternative is presented below.

Biological Resources

Of the three alternatives analyzed, only the No Project – No Reuse Alternative eliminates all impacts to biological resources. The No Project – Reuse Alternative, the Reduced Project/Adaptive Reuse Alternative, and the Relocation/Adaptive Reuse Alternative would result in a similar level of impact to biological resources as the proposed project. These impacts can be mitigated to below a level of significance and do not affect the selection of an environmentally superior alternative.

Cultural Resources

The No Project – No Reuse Alternative eliminates all impacts to cultural resources. The No Project – Reuse Alternative would result in fewer impacts than the proposed project, as the buildings would be upgraded to the Secretary of the Interior's Standards for Rehabilitation. Impacts under the No Project – Reuse Alternative would be less than significant. The Reduced Project/Adaptive Reuse Alternative would also result in fewer impacts than the proposed project, as fewer buildings would be proposed for demolition under this alternative. However, similar to the proposed project, impacts resulting from demolishing the buildings would remain significant and unmitigated. Similar to the proposed project, the Relocation/Adaptive Reuse Alternative would impact all on-site structures, resulting in significant and unmitigated impacts to cultural resources.

Hazards and Hazardous Materials

All of the alternatives have a relatively similar magnitude of impacts relating to hazards and hazardous materials. There is no clearly identifiable environmentally superior alternative when considering hazards and hazardous materials.

Transportation and Traffic

The No Project – Reuse Alternative as well as the Reduced Project/Adaptive Reuse Alternative and Relocation/Adaptive Reuse Alternative would result in increased impacts to transportation and traffic over the proposed project. The No Project – No Reuse Alternative would result in similar impacts to transportation and traffic as the proposed project.

No alternative would reduce all environmental impacts and meet the project objectives. The No Project – No Reuse Alternative would reduce all environmental impacts and eliminate the significant and unmitigated impact to historical resources; however, this alternative would not meet any of the project

objectives. As shown in Table 4.0-1, both the No Project – Reuse Alternative and the Reduced Project/Adaptive Reuse Alternative would result in similar or fewer environmental impacts to all issue areas in comparison to the proposed project; however, it should be recognized that impacts to historical resources would remain significant and unmitigated under the Reduced Project/Adaptive Reuse Alternative. In addition, the No Project – Reuse Alternative would meet some of the identified project objectives if used for private uses. The Reduced Project/Adaptive Reuse Alternative would also meet some of the identified project objectives if the buildings were to be reused for either public or private uses. Therefore, the environmentally superior alternative would be the No Project – Reuse Alternative (reuse of the on-site structures for private use); however, CEQA Guidelines Section 15126.6(e)(2), states that if the environmentally superior alternative is the "no project" alternative, the EIR shall identify an environmentally superior alternative among the other alternatives. Therefore, the environmentally superior alternative is the Reduced Project/Adaptive Reuse Alternative with either public or private uses.

Source: SanGIS; 2006 | G:\Projects\62610 EDGEMOORDEMO\map docs\mxd\EIR\Alternatives.mxd | Last Updated :05-19-08

Buildings to be demolished under Reduced Project and Relocation Alternatives

FIGURE 4.3-1

Table 4.0-1. Comparison of Project Alternative Impacts to Proposed Project Impacts

	Issue Area			
	Biological Resources	Cultural Resources	Hazards and Hazardous Materials	Transportation and Traffic
Proposed Project	Mitigated to below a level of significance	Significant and unmitigated	Mitigated to below a level of significance	No significant impact
No Project – No Reuse	Less impactive than proposed project; no significant impact	Less impactive than proposed project; no significant impact	Greater impact than proposed project; mitigated to below a level of significance	Less impactive than proposed project; no significant impact
No Project – Reuse	Similar impact as proposed project; mitigated to below a level of significance	Less impactive than proposed project; less than significant impact	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review
Reduced Project/ Adaptive Reuse (public or private uses)	Similar impact as proposed project; mitigated to below a level of significance	Less impactive than proposed project; significant and unmitigated	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review
Relocation/ Adaptive Reuse (public or private uses)	Similar impact as proposed project; mitigated to below a level of significance	Similar impact as proposed project; significant and unmitigated	Similar impact as proposed project; mitigated to below a level of significance	Equal or greater amount of traffic would be generated compared to proposed project. CEQA significance to be determined with supplemental environmental review

Table 4.4-1. Buildings Evaluated and Similar Buildings

Buildings Evaluated	Similar Buildings	Date of Construction	Approximate Square Footage	Overall Condition	Specific Safety Characteristics	General Safety Characteristics
Building 2		1925	7,600	Fair to poor		Age-related deficiencies such as cracking and spalling of the exterior stucco and water damage in the interiors were noted. Exterior cladding is deteriorated with potential mold risk that could create a safety hazard for workers in the project area. Insulation is substandard. The fire sprinkler systems are out of date and do not provide current code coverage, many buildings are structurally or seismically deficient, and foundations are deteriorated. Building system components, including electrical wiring, plumbing, and windows are beyond their useful life. In addition, none of the surveyed buildings currently comply with ADA, CHBC, or 2007 CBC requirements. Substantial upgrades would be required to correct these deficiencies and bring the buildings up to code.
	Building 6	1926	5,300			
	Building 14	1926	3,600			
	Building 15	1926	5,400			
Building 3	--	1923/4	5,000	Fair to poor		
Building 8		1913	5,000	Fair to poor	Wood eve rot was observed in several locations	
	Building 7	1913	5,000			
	Building 9	1913	5,000			
	Building 12	1913	4,600			
Building 16		1951	12,500	Fair		
	Building 13	1961	24,000			
	Building 17	1951	41,200			
	Building 1	1958	4,500			
Building 19		1945	15,400	Good		
	Building 18	1929	15,400			
Structures Eliminated From Evaluation Based on Size						
	Building 4	1913	900			
	Building 5	1913	1,000			
	Building 11	1954	1,400			
	Building 20	1954	1,200			
	Building 21	1951	2,700			
	Building 22	1951	2,700			
	Building 23	1951	2,700			
	Building 24	1951	2,700			
	Building 25	1951	144			
	Building 26	1940	144			
	Building 27	1940	144			

Notes: Building 10, the National Register-listed Polo Barn, would not be reused under this alternative.
Approximate square footage obtained from calculations made by Nasland, October 11, 2007 (Appendix F).

Table 4.4-2. Total Rehabilitation Costs

Building	Historic Use(1)	Contemporary Use(2)	Rehabilitation Costs (in dollars)
2	Women's Ward	Offices, Pharmacy, Conference Room, Storage	$2,421,580
3	Dining and Recreation Hall	Mess Hall, Housekeeping, Laundry	$1,423,246
8	Dairy Barn/Men's Ambulatory Ward	Senior Center	$1,690,210
16	Dietary, Dining Room and Kitchen	Dietary, Dining Room and Kitchen	$3,185,088
19	Enclosed Ward, Psychiatric Ward, Custodial Wards, Men and Women	Custodial Wards	$4,282,232

Notes: 1 Historic use refers to the original use of the structures.
2 Contemporary use refers to current use of the structures.
These costs do not include various fees and insurance requirements associated with rehabilitation activities.

Table 4.4-3. Residual Land Value, Reduced Project/Adaptive Reuse Alternative

	General Commercial Use	Specialty Retail Use
Capitalized Value of Net Operating Income (NOI)		
Existing Buildings NOI	$11,080,000	$14,843,000
New Development NOI	$0	$0
Total Capitalized Value of NOI	$11,080,000	$14,843,000
(Less) Cost of Sale/Developer Profit	($4,994,000)	($5,263,000)
Supportable Investment	$6,086,000	$9,580,000
(Less) Rehabilitation/New Development Costs*	($31,078,000)	($32,118,000)
Residual Land Value	($24,992,000)	($22,538,000)

Note: *This cost was based on the base cost estimates provided by Matalon Architecture & Planning and includes additional direct and indirect costs.

Table 4.5-1. Building Characteristics

Buildings Evaluated	Similar Buildings	Overall Condition	Specific Safety Characteristics	General Safety Characteristics
Building 2	Building 6 Building 14 Building 15	Fair to poor	Relocation of these buildings would be structurally feasible.	Age-related deficiencies such as cracking and spalling of the exterior stucco and water damage in the interiors were noted. Exterior cladding is deteriorated with potential mold risk that could create a safety hazard for workers in the project area. Insulation is substandard. The fire sprinkler systems are out of date and do not provide current code coverage, many buildings are structurally or seismically deficient, and foundations are deteriorated. Building system components, including electrical wiring, plumbing, and windows are beyond their useful life. In addition, none of the surveyed buildings currently comply with ADA, CHBC, or 2007 CBC requirements. Substantial upgrades would be required to correct these deficiencies and bring the buildings up to code.
Building 3	--	Fair to poor	Relocation of these buildings would be structurally feasible.	
Building 8	Building 7 Building 9 Building 12	Fair to poor	Due to the nature of the concrete structure of the buildings, structural integrity would be compromised in these buildings during relocation.	
Building 16	Building 13 Building 17 Building 1	Fair	Due to the nature of the concrete structure of the buildings, structural integrity would be compromised in these buildings during relocation.	
Building 19	Building 18	Good	Due to the nature of the concrete structure of the buildings, structural integrity would be compromised in these buildings during relocation.	

Buildings Evaluated	Similar Buildings	Overall Condition	Specific Safety Characteristics	General Safety Characteristics
Structures Eliminated From Evaluation Based on Size				
	Building 4 Building 5 Building 11 Building 20 Building 21 Building 22 Building 23 Building 24 Building 25 Building 26 Building 27			

Table 4.5-2. Total Relocation and Rehabilitation Costs

Building	Historic Use(1)	Contemporary Use(2)	Relocation Costs (in dollars)	Rehabilitation Costs (in dollars)	Total (Relocation and Rehabilitation)
2	Women's Ward	Offices, Pharmacy, Conference Room, Storage	$720,383	$2,421,580	$3,141,963
3	Dining and Recreation Hall	Mess Hall, Housekeeping, Laundry	$417,833	$1,423,246	$1,841,079
8	Dairy Barn/Men's Ambulatory Ward	Senior Center	--	$1,690,210	$1,690,210
16	Dietary, Dining Room and Kitchen	Dietary, Dining Room and Kitchen	--	$3,185,088	$3,185,088
19	Enclosed Wards, Psychiatric Ward, Custodial Wards, Men and Women	Custodial Wards	--	$4,282,232	$4,282,232

Notes: 1 Historic use refers to the original use of the structures.
2 Contemporary use refers to current use of the structures.
These costs do not include various fees and insurance requirements associated with relocation activities.

Table 4.5-3. Residual Land Value, Relocation/Adaptive Reuse Alternative

	Specialty Retail Use, Development of New Office/Research and Development Uses	Specialty Retail Use, New Development of Mixed-Uses
Capitalized Value of Net Operating Income (NOI)		
Existing Buildings NOI	$7,920,000	$7,920,000
New Development NOI	$86,554,000	$90,645,000
Total Capitalized Value of NOI	$94,474,000	$98,565,000
(Less) Cost of Sale/Developer Profit	($15,431,000)	($16,576,000)
Supportable Investment	$79,043,000	$81,989,000
(Less) Rehabilitation/New Development Costs*	($96,713,000)	($98,991,000)
Residual Land Value	($17,670,000)	($17,002,000)

Note: * This cost was based on the base cost estimates provided by Matalon Architecture & Planning and also includes additional direct and indirect costs.

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6.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

EIR Preparers

Lead Agency

County of San Diego
Department of General Services
Facilities Management Division
5555 Overland Drive, Suite 2207
Building 2, Room 220
San Diego, CA 92123-1294

Dahvia Lynch, AICP, Project Manager
Dennis Verrilli, Project Manager

Environmental Consultants

Environmental Impact Report

HDR Engineering, Inc.
8690 Balboa Avenue, Suite 200
San Diego, CA 92123

Betty Dehoney, CEP, Program Manager
Sophia Habl Mitchell, Project Manager
Meghan Scanlon, Lead Environmental Analyst
Katie Wu, Environmental Analyst
Anders Burvall, GIS/Graphics
Terri Parsons, Document Specialist

Biological Resources Letter Report and Smooth Tarplant Memorandum

HDR Engineering, Inc.
8690 Balboa Avenue, Suite 200
San Diego, CA 92123

Eric Peffer, Wildlife Ecologist

Historical Resources Evaluation Report

Heritage Architecture & Planning
625 Broadway, Suite 800
San Diego, CA 92101

David Marshall, AIA, NCARB, Principal Architect
Eileen Magno, MA, Principal Reviewer
Robert Cromwell, MA, Research

IS Architecture
5649 La Jolla Boulevard
La Jolla, CA 92037

Ione Stiegler, AIA, Historic Preservation Architect
Jaye Furlonger, MA, Historical Research, Field Work, Site Analysis, Technical Writing, Photography

Adaptive Reuse Study

Matalon Architecture & Planning
910 Grand Avenue, Suite 203
San Diego, CA 92109

Michael Matalon
Jenny Sauernheimer

Structural Assessment

Nasland Engineering
4740 Ruffner Street
San Diego, CA 92111

William A. Moser, PE

Economic Feasibility Analysis

Keyser Marston Associates, Inc.
1660 Hotel Circle North, Suite 716
San Diego, CA 92108

Gerald M. Trimble, Managing Principal
Reena M. Arvizu, Senior Analyst

Greenhouse Gas Analysis

Investigative Science and Engineering, Inc.
P.O. Box 488
Ramona, CA 92065

Rick Tavares, PhD, Principal

7.0 LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS

7.1 Mitigation Measures

Biological Resources

Mitigation for Impact BIO-1: Sensitive Bats: Potential Demolition Impacts to Individuals or Nests

MM BIO-1 A pre-demolition clearance survey for sensitive bats shall be conducted prior to the demolition of Building 12. Surveys shall be conducted within one week prior to building demolition. Should any bats be found inhabiting the building, demolition shall be avoided from March through August in order to avoid impacts to pregnant females or young incapable of flying. Bats found inhabiting a maternity colony after August shall be allowed to exit the roost and prevented from reentering. Demolition will not occur until all bats have departed.

Mitigation for Impact BIO-2: Raptors: Potential Demolition Impacts

MM BIO-2 In accordance with the Migratory Bird Treaty Act, potential nesting vegetation (i.e., trees, shrubs, ground cover, etc.) and buildings supporting raptors shall be avoided during the nesting season, recognized from February 15 through August 31. Should demolition occur between these dates, a qualified biologist shall conduct a survey no more than three days prior to demolition activity to identify any active nests. If active nests are identified during the surveys, then the nesting vegetation or buildings shall be avoided until the nesting event has completed and the juveniles can survive independently from the nest. The biologist shall flag the areas that are considered to support sensitive raptors and establish a 500 foot buffer (e.g., exclusionary flagging/fencing) around these areas, consistent with the San Diego MSCP. Demolition activities shall not occur within the buffer until the nesting event has been completed.

Cultural Resources

Mitigation for Impact CR-1: Historical Resources

MM CR-1 The project applicant shall prepare appropriate level Historical American Building Survey (HABS) documentation in accordance with the National Park Service's *Historic American Building Survey Guidelines for Preparing Written and Historical Descriptive Data* as identified below:

Building Number	HABS Level
1	III (Architectural Significance; District Contributor)
2	II (Historical and Architectural Significance; District Contributor)
3	II (Historical and Architectural Significance; District Contributor erroneously left off original list)
4	II (Historical Significance; District Contributor)
5	II (Historical and Architectural Significance; District Contributor)

Building Number	HABS Level
6	II (Historical and Architectural Significance; District Contributor)
7	II (Historical and Architectural Significance; District Contributor)
8	II (Historical and Architectural Significance; District Contributor)
9	II (Historical and Architectural Significance; District Contributor)
10	Not required; demolition of this structure would not occur
11	II (Historical and Architectural Significance; District Contributor)
12	II (Historical and Architectural Significance; District Contributor)
13	III (Historical and Architectural Significance; District Contributor)
14	II (Historical and Architectural Significance; District Contributor)
15	II (Historical and Architectural Significance; District Contributor)
16	III (Historical and Architectural Significance; District Contributor)
17	III (Historical and Architectural Significance; District Contributor)
18	II (Historical and Architectural Significance; District Contributor)
19	II (Historical and Architectural Significance; District Contributor)
20	Not required; unassociated County of San Diego facility
21	IV (District Contributor)
22	IV (District Contributor)
23	IV (District Contributor)
24	IV (District Contributor)
25	IV (District Contributor)
26	II (Historical and Architectural Significance; District Contributor)
27	II (Historical and Architectural Significance; District Contributor)
Breezeways	IV (District Contributor)

Note: Buildings requiring HABS Level IV documentation exhibit moderate to no significance in and of themselves as indicated in Table 2.2-1; however, HABS documentation would still be required due to the buildings' contribution to the overall context of the site.

MM CR-2 An historic interpretive site model shall be prepared including buildings constructed prior to the 1960s. Interpretive information, such as light-up coded information showing the different phases of use, shall be included. The interpretive model shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the model shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board. An historic interpretive display shall be prepared including buildings constructed after 1960 and shall include a combination of wall-mounted, pedestal, and tabletop displays and interactive activities. Information presented in the interpretive display shall include, but is not limited to, a site model, an historic description of the various uses of the project site and surrounding landscape, historic photographs, excerpts from oral interviews, a documentary film

running on a monitor when activated by a visitor, or representative salvaged artifacts from the demolished buildings. The documentary film shall include site footage, interviews with current and former staff and patients, music, titles/captions, and historic photographs. The interpretive display shall be made available, by the County of San Diego, to an appropriate museum or interpretive center, as determined by the County Historian or County Historical Site Board, for a minimum of one year after the current Edgemoor facility is closed. Subsequently, the interpretive display shall be maintained in the archives of the County Historian and displayed as deemed appropriate by the Historian or the County Historical Site Board.

Hazards and Hazardous Materials

Mitigation for Impact HAZ-1: Asbestos-Containing Materials

MM HAZ-1 Prior to any demolition, renovation, or any other activity that may disturb known or potential ACM, either an inspection shall be performed by the Department of Environmental Health (DEH), Occupational Health Program (OHP), or the affected materials shall be handled as asbestos-containing in accordance with all federal and state requirements, including the County of San Diego Administrative Manual Asbestos Policy 0050-01-9. If future sampling identifies any such materials as ACM, they shall be properly abated and disposed of by a state-licensed abatement contactor prior to disturbance or demolition in accordance with all federal and state requirements.

In addition, the Air Pollution Control District (APCD) and Cal/OSHA have notification requirements pertaining to the disturbance of ACM. When applicable, these notifications must be made prior to the activity as follows:

- Ten day notification to APCD for renovation/demolition activities.
- 24-hour notification of Cal/OSHA.

Mitigation for Impact HAZ-2: Lead-Based Paint

MM HAZ-2 Prior to any activity that may cause lead exposure to workers, lead-based paint (LBP) sampling shall be performed in accordance with all federal and state requirements. Should future demolition disturb any suspect paint, a LBP inspection or risk assessment shall be conducted by a state or federally certified LBP inspector/assessor to identify areas of potential worker exposure in accordance with all federal and state requirements, including Title 17, CCR Section 35005. Should any LBP be identified, such painted surfaces shall be included in an approved interim controls (Operations and Maintenance) program and disposed of by a state-licensed abatement contractor.

Design Considerations

As identified in Section 1.2.2, the following design features are identified for the project:

Air Quality

- Standard mitigation and project design considerations listed in Section 5.1 of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for

Air Quality would be implemented. These considerations would reduce PM_{10}, NO_x, and VOC emissions from demolition and debris removal activities.

- The project proponent has established a limit on the demolition and transport activities to a maximum of 260 cubic yards of material per day over 180 days.
- The project would comply with APCD Rule 51 and California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700, which prohibit discharge of any pollutants that would be considered a nuisance or endangers the comfort, health, or safety of any person.

Cultural Resources

- In the unlikely event that human remains are encountered, the project would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98(b), which prohibit further disturbance of such remains, as required by State law.

Geology and Soils/Hydrology and Water Quality

- A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented to incorporate site design measures or short- or long-term source of treatment control Best Management Practices (BMPs) in compliance with the both the City of Santee and County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance and both the City's and County's Standard Urban Stormwater Mitigation Plan (SUSMP).

Hazards and Hazardous Materials

- All storage, handing, transport, emission, and disposal of hazardous substances would be in full compliance with local, state, and federal regulations.

Land Use and Planning

- Development would be in accordance with the City's Town Center Specific Plan (Chapter 17.18 of the City's Municipal Code)

Noise

- The project would comply with the construction noise standards of the San Diego County Code of Regulatory Ordinances. Construction equipment operations would occur only between 7 a.m. and 7 p.m. This is consistent with the City of Santee Noise Ordinance (Chapter 8.12.290 of the City's Municipal Code).

Implementation of project-specific mitigation measures and project design features would reduce impacts; however, significant impacts would still be identified for historical resources. Therefore, a Statement of Findings and Overriding Considerations would be required pursuant to CEQA Guidelines Sections 15091 and 15093.