



County of San Diego

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August 9, 2008

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

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

Skyline Retirement Center

PDS2016-GPA-16-005 PDS2016-REZ-16-003

PDS2016-MUP-16-003 PDS2016-ER-16-19-001

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

3. a. Contact Jeff Smyser, Project Manager
b. Phone number: (858) 495-5438
c. E-mail: jeffrey.smyser@sdcounty.ca.gov

4. Project location:

Campo Road (SR94), East of Via Mercado and West of 11330 Campo Road, in Valle de Oro Community Plan Area, Unincorporated San Diego County

Thomas Guide Coordinates: Page 1271, Grid G5

Located within an unsectioned portion of the Jamacha Land Grant, Township 16 South, Range 1 West, on the 2010 Jamul Mountain, California, 7.5-minute U.S. Geological Survey (USGS) quadrangle

5. Project Applicant name and address:

Skyline Wesleyan Church, 11330 Campo Road, La Mesa, CA 91941

6. General Plan
Regional Category: No Jurisdiction
Community Plan: Valle De Oro
Land Use Designation: Open Space-Conservation (OS-C)
Density: -
Floor Area Ratio (FAR) -
7. Zoning
Use Regulation: Transportation and Utility Corridor (S94)
Minimum Lot Size: -
Special Area Regulation: -
8. Description of project:

The project proposes a General Plan Amendment, Rezone, and Major Use Permit for Major Impact Services and Utilities to construct a senior retirement center. The project proposes a full-service, senior living facility with multiple levels of care and facilities. The project consists of several structures. A multi-story main building would have three separate wings that connect to central common areas. The main building would include 147 assisted living units and 75 independent living units in the three wings. In addition, there would be five detached 3,000 s.f. duplex buildings for 10 more independent living units. The total number of units is 232. The planned central common areas of the main building are on two floors and include a lobby, offices, clinic services, exercise rooms, a commercial kitchen, and dining halls. The planned facility grounds include a pool, gym, landscaped courtyard and social grounds, a playground, and walking trails. Basement parking under one wing of the main building would include 77 spaces and 30 exterior spaces would be distributed along the main internal drive. The duplexes would have an additional 32 parking spaces, for a total of 139 on-site parking spaces. Sidewalk would be constructed to extend an existing sidewalk stub along Campo Road (SR94). A pedestrian trail would connect the western end of the retirement center to an existing sidewalk along Via Mercado.

The site includes approximately 8.9 acres of undeveloped land located on the north side of Campo Road (SR94), east of Via Mercado and northwest of the existing Skyline Wesleyan Church (11330 Campo Road) in the Valle de Oro Community Planning area, within unincorporated San Diego County (APNs: 506-140-06, 07). The site is subject to the General Plan Regional Category 'No Jurisdiction' and Land Use Designation Open Space-Conservation (OS-C). Zoning for the site is Transportation and Utility Corridor (S94). The site is undeveloped. The General Plan Amendment proposes: changing the Regional Category to Village; changing the Land Use Designation to Village Residential 30 (VR-30); and changing a map in the Valle de Oro Community Plan to reflect the Land Use Designation change to VR-30. The Rezone proposes changing the Use Regulations to Urban Residential (RU) and changing associated development regulation designators for animal regulations, building height, and setbacks.

Access to the Skyline Retirement Center would be provided from an existing private driveway off Campo Road (SR94), which connects to the adjacent Skyline Wesleyan Church's parking lots. The project would require imported water and sewer service from the Otay Water District, which are available adjacent to the site. No off-site extension of sewer or water utilities will be required by the project. The proposal includes no off-site streets or widening of existing streets. The proposal includes three BMP detention basins. Earthwork will consist of 35,000 yards of cut and 35,000 yards of fill material for a net import of 0 cubic yards. The following project design considerations would also be conditioned: use of ENERGYSTAR® certified appliances; solar panels; low-flow fixtures; water-efficient outdoor irrigation; adherence to California 2016 Title 24 Building Energy Efficiency Standards; solid waste diversion; landscape screening and an 8-foot noise wall. The project is proposed to be LEED Silver.

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

Lands surrounding the project site are used for multifamily and single family residential to the north and northeast; commercial uses to the west; the Skyline Wesleyan Church and parking area to the east; Campo Road (SR94) to the south and an SDG&E substation and open space south of Campo Road. The topography of the project site rises from an elevation of approximately 480 feet on the southeast corner of the site to approximately 550 feet along the site's northern boundary, with slopes varying across the site. Surrounding property on the north side of Campo Road reflects the rise in elevation from south to north. Existing multifamily and single family homes are on the top of the bluff on the north of the site and Campo Road forms the southern border of the site. The church and its parking are terraced on property to the east. To the south of Campo Road, the land rises from north to south.

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

| <u>Permit Type/Action</u> | <u>Agency</u> |
|--|---------------------------------------|
| Administrative Permit Grading and Clearing | County of San Diego |
| General Plan Amendment | County of San Diego |
| Landscape Plans | County of San Diego |
| Major Use Permit | County of San Diego |
| Rezone | County of San Diego |
| Grading Permit | County of San Diego |
| Improvement Plans | County of San Diego |
| State Highway Encroachment Permit | CalTrans |
| Air Quality Permit to Construct | Air Pollution Control District (APCD) |
| Air Quality Permit to Operate – Title V Permit | APCD |
| National Pollutant Discharge Elimination System (NPDES) Permit | RWQCB |

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| | |
|---|---|
| General Construction Storm Water Permit | RWQCB |
| Water District Approval | Otay Water District |
| Sewer District Approval | Otay Water District |
| Fire District Approval | San Miguel Consolidated Fire Protection District San Diego County Fire Authority |

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

YES

☒

NO

☐

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

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

☐ [Aesthetics](#)

☐ [Agriculture and Forest Resources](#)

☐ [Air Quality](#)

☒ [Biological Resources](#)

☒ [Cultural Resources](#)

☐ [Geology & Soils](#)

☒ [Greenhouse Gas Emissions](#)

☐ [Hazards & Haz. Materials](#)

☐ [Hydrology & Water Quality](#)

☐ [Land Use & Planning](#)

☐ [Mineral Resources](#)

☒ [Noise](#)

☐ [Population & Housing](#)

☐ [Public Services](#)

☐ [Recreation](#)

☒ [Transportation/Traffic](#)

☐ [Utilities & Service Systems](#)

☒ [Mandatory Findings of Significance](#)

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DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.


Signature

Jeff Smyser, AICP
Printed Name


Date

Land Use/Environmental Planner
Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

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I. AESTHETICS -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

Less Than Significant Impact: Based on a site visit completed by County staff Jeff Smyser on April 4, 2018, the proposed project is located near or within the viewshed of a scenic vista. The viewshed and visible components of the landscape within that viewshed, including the underlying landform and overlaying land cover, establish the visual environment for the scenic vista. Though no state scenic highway is affected, Campo Road (SR94), is designated as a County scenic highway from SR 125 to Interstate 8, a distance of approximately 50 miles. The visual environment of the subject scenic vista is the Campo Road (SR94), corridor, which extends from SR 125 west of the site to undeveloped mountains and hillsides east of the urbanized area near the site. The visual composition consists of visible urbanized development, vegetated hillsides and treed ridgelines, with distant mountains visible when traveling in the eastbound direction. Existing multifamily residential structures line the hilltop along the north boundary of the project site, constituting a dominant visual characteristic when viewing the site. A large church complex exists on the eastern border of the site, forming another dominant visual characteristic when traveling eastbound on the Campo Road (SR94) highway. Tall hills rise behind the church. The Rancho San Diego Town Center and Plaza Rancho commercial development areas are located approximately one mile east of the project site.

Existing multifamily residential structures line the hilltop along the north boundary of the project site, constituting a dominant visual characteristic when viewing the site. Power lines cross the west end of the site. Immediately east of the project site, the view on the north side of the highway consists primarily of a vegetated hillside, a retaining wall on one portion, and the entrance to the existing Skyline Wesleyan Church east of the wall, where Jamacha Boulevard forms a T intersection with Campo Road (SR94). Structures and parking lots on the church

campus can be seen rising above the highway from the eastbound lanes. Vegetated open space exists on the south side of the highway. East of the church on the north side of the highway is a short open space of less than 1000 feet and then commercial development. Commercial development of the Rancho San Diego Town Center and Plaza Rancho areas dominate the corridor along Campo Road in this segment, where Campo Road (SR94) turns south.

The proposed project is a senior retirement center. The project consists of: a multi-story main building with three separate wings that connect to central common areas; five duplexes; passive recreation areas; and internal circulation drives and parking. The project will not damage scenic resources along the County scenic highway and, based on a site visit by County staff on April 4, 2018 and photo simulations provided by Domus Studio Architecture (September 27, 2017), the project has been determined to be compatible with the existing visual environment in terms of visual character and quality for the following reasons:

1. The area of the site is almost fully developed. In fact, the site fits the definition of an “infill site” given in CEQA at Section 21061.3. The site also fits the definition of “infill” found in the County’s General Plan.
2. Residential, commercial, and institutional development frame the site and multi-family dwellings lining the hill above the site form a dominant visual feature of the site and the project buildings will be lower than those dwellings.
3. The project’s three-story main building, which will be visible from the Campo Road (SR94), is designed with a multi-family building appearance.
4. The project includes extensive landscaping and screening to add variety to the visual character of the site.
5. Urban development such as residential, commercial, and institutional uses exist west and east of the site along Campo Road (SR94). Though the road is a County scenic highway as it passes the project site, the existing uses are significant elements of the visual character of several miles of the western end of the highway.
6. Because the project site is lower than surrounding land on the north side of Campo Road (SR94), the tall hill in the open space to the east of the site, behind the church complex, will still be visible from the highway.
7. Mitigation of the project’s potential impacts on biological resources includes permanent biological open space easements on two parcels along the south side of Campo Road (SR94). The western mitigation parcel, directly across the highway from the southeastern portion of the site, includes approximately 2,000 linear feet of highway frontage. The eastern mitigation parcel, east of the church site, includes approximately 1,700 feet of highway frontage. The establishment of biological mitigation easements on these parcels will preserve vegetated open space along the highway, within the scenic landscape of the project site.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XIX. Mandatory Findings of Significance for a comprehensive list of the projects considered. This project will not contribute to a cumulative impact because:

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1. The area of the site is almost fully developed.
2. Residential, commercial, and institutional development frame the site and multi-family dwellings lining the hill above the site form a dominant visual feature of the site and the project buildings will be lower than those dwellings.
3. Because the project site is lower than surrounding land on the north side of Campo Road, the highlands in the open space to the east of the site, behind the church complex, will still be visible from the highway.
4. The establishment of biological open space easements will preserve vegetated habitat biological open space along the highway, within the scenic landscape of the project site.

Therefore, the project will not result in adverse project or cumulative impacts on a scenic vista.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic ([Caltrans - California Scenic Highway Program](#)). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. While there is no impact on a state scenic highway, the project site is located on a County scenic highway. Please see the discussion in I.a) above regarding the County scenic highway.

No Impact: Based on a site visit completed by County staff Jeff Smyser on April 4, 2018, the proposed project is not located near or visible within the composite viewshed of a State scenic highway. The nearest State scenic highway is a short segment (less than two miles long) of State Route 125 from Campo Road (SR94) to Interstate 8. This State scenic highway is approximately three miles west of the project site. The project site is not visible from that State scenic highway. While there is no impact on a state scenic highway, the project site is located on a County scenic highway. Please see the discussion in I.a) above regarding the County scenic highway.

Therefore, the project will not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the project site and surrounding can be characterized as an undeveloped site surrounded on three sides by commercial, residential, and institutional development with a highway forming the fourth side of the site.

The proposed project is a senior retirement center. The project consists of: a multi-story main building with three separate wings that connect to central common areas; five duplexes; passive recreation areas; and internal circulation drives and parking. The discussions of scenic resources and the scenic vista in Sections I.a) and I.b) provide detail of the visual character of the site and surroundings. Based on a site visit by County staff on April 4, 2018 and photo simulations provided by Domus Studio Architecture (September 27, 2017), the project will not damage scenic resources along the County scenic highway and is compatible with the existing visual environment in terms of visual character and quality for the following reasons:

1. The area of the site is almost fully developed. In fact, the site fits the definition of an "infill site" given in CEQA at Section 21061.3. The site also fits the definition of "infill" found in the County's General Plan.
2. Residential, commercial, and institutional development frame the site and multi-family dwellings lining the hill above the site form a dominant visual feature of the site and the project buildings will be lower than those dwellings.
3. The project's three-story main building, which will be visible from the Campo Road (SR94) highway, is designed with a multi-family building appearance.
4. The project includes extensive landscaping and screening to add variety to the visual character of the site.
5. Urban development such as residential, commercial, and institutional uses exist west and east of the site along Campo Road (SR94). Though the road is a County scenic highway as it passes the project site, the existing uses are significant elements of the visual character of several miles of the western end of the highway.
6. Because the project site is lower than surrounding land on the north side of Campo Road (SR94), the tall hill in the open space to the east of the site, behind the church complex, will still be visible from the highway.

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7. Mitigation of the project's potential impacts on biological resources includes permanent biological open space easements on two parcels along the south side of Campo Road (SR94). The western mitigation parcel, directly across the highway from the southeastern portion of the site, includes approximately 2,000 linear feet of highway frontage. The eastern mitigation parcel, east of the church site, includes approximately 1,700 feet of highway frontage. The establishment of mitigation easements on these parcels will preserve vegetated open space along the highway, within the scenic landscape of the project site.

The project will not result in cumulative impacts on visual character or quality because the entire existing viewshed and a list of past, present and future projects within that viewshed were evaluated. Refer to XIX. Mandatory Findings of Significance for a comprehensive list of the projects considered. This project will not contribute to a cumulative impact because:

1. The area of the site is almost fully developed.
2. Residential, commercial, and institutional development frame the site and multi-family dwellings lining the hill above the site form a dominant visual feature of the site and the project buildings will be lower than those dwellings.
3. Because the project site is lower than surrounding land on the north side of Campo Road, the tall hill in the open space to the east of the site, behind the church complex, will still be visible from the highway.
4. The establishment of biological mitigation easements will preserve vegetated habitat biological open space along the highway, within the scenic landscape of the project site.

Therefore, the project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code (San Diego County Code of Regulatory Ordinances, Title 5, Chapter 2). Being in Zone B means a site is not within a 15 mile radius of the Palomar Observatory or the Mount Laguna Observatory. The proposed project will not adversely affect nighttime views or astronomical observations because the project will conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

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In addition, the proposed project will control outdoor lighting and sources of glare through compliance with Zoning Ordinance Sections 6322, 6324, and 6326, which regulate outdoor lighting.

The project will not contribute to significant cumulative impacts on day or nighttime views because the project will be required through the MUP to conform to the Light Pollution Code. The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources of light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

In addition, the proposed project will control outdoor lighting and sources of glare through compliance with Zoning Ordinance Sections 6322, 6324, and 6326, which regulate outdoor lighting. In addition, the project's outdoor lighting is controlled through the Major Use Permit, which requires compliance with the outdoor lighting controls described above.

Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensures that the project will not create a significant new source of substantial light or glare.

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project site has land designated as Farmland of Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). However, based on a site visit and a review of historic aerial photography, there is no evidence of agricultural use on the project site since 1995 photos. This date is at least four years prior to

the last FMMP mapping date. In order to qualify for the Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance designations, land must have been cropped at some time during the four years prior to the last FMMP mapping date. Given the lack of agricultural use on the site within at least the past 22 years, the Farmland of Local Importance designation of this area according to the State is incorrect. The Farmland designation is likely misapplied as a result of the large scale of the Statewide mapping effort which assigns Farmland designations based on aerial photography and limited ground verification. Therefore, due to the lack of historic agricultural use at the project site, the site does not meet the definition of an agricultural resource and no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use will occur as a result of this project.

In addition, the County agricultural resources specialist, Nick Koutoufidis, evaluated the site to determine the importance of the resource based on the County's Local Agricultural Resources Assessment (LARA) model (March 27, 2018) which takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcountry.ca.gov/pds/docs/AG-Guidelines.pdf>.

In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource. Based on the results of the LARA Model, the site is not considered an important agricultural resource. The site received a low rating for water. The site received a high rating for climate and a moderate rating for soil. Therefore, the site's low water quality rating means that the site is not an important agricultural resource.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site is zoned Transportation & Utility Corridor (S94), which is not considered to be an agricultural zone. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site including offsite improvements do not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project site and surrounding area within radius of one mile have land designated as Farmland of Local Importance. However, as discussed in the Agricultural Resources Assessment prepared by Nick Koutifidis and dated March 27, 2018, on file with Planning & Development Services as Environmental Review Number PDS2016-ER-16-19-001, the project will not result in the potentially significant conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance for the following reasons:

The site was evaluated to determine the importance of the resource based on the County's Local Agricultural Resources Assessment (LARA) model which takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcountry.ca.gov/pds/docs/AG-Guidelines.pdf>.

In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or

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moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource. Based on the results of the LARA Model, the site is not considered an important agricultural resource. The site received a low rating for water. The site received a high rating for climate and a moderate rating for soil. Therefore, the site's low water quality rating means that the site is not an important agricultural resource.

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

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: An air quality report titled "Air Quality Assessment for the Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (September 2016). The project proposes a full-service senior living facility with up to 232 housing units divided between 85 retirement units and 147 congregate care units on approximately 8 acres. The site is currently designated as Conservative/Open Space in the County's General Plan. This change will require a General Plan Amendment and rezone of the site.

Trip generation rates from the proposed land uses would be greater than rates when compared to the open space designation because open space designations do not generate trips. However, the project will accommodate a use that is anticipated within the San Diego Association of Governments (SANDAG) growth projections for multi-level senior care centers. Residents of the project would come from the existing San Diego population, and the project would not be growth inducing; thus, the project's emissions would not exceed projected emissions for vehicles and buildings accounted for in the RAQS and SIP.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

Less Than Significant Impact: An air quality report titled "Air Quality Assessment for the Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (September 2016). Air emissions was modeled under conditions of project construction beginning in 2018 and to be completed in 18 months. Table 1 below summarizes the construction phases proposed for the project.

Table 1 Construction Schedule and Phasing

| Phase | Phase Name | Phase Type | Start Date | End Date |
|-------|-----------------------|-----------------------|------------|------------|
| 1 | Grading | Grading | 01/01/2018 | 02/28/2018 |
| 2 | Building Construction | Building Construction | 03/01/2018 | 06/30/2019 |
| 3 | Paving | Paving | 01/01/2019 | 06/30/2019 |
| 4 | Architectural Coating | Architectural Coating | 01/01/2019 | 06/30/2019 |

Construction activities include grading (balanced onsite), building construction, site paving, and architectural coating, which were quantified using the California Emissions Estimator Model (CalEEMod) Version 2013.2.2 computer program.¹ Grading activities associated with the construction of the project would be subject to SDAPCD Rule 50, Visible Emissions; Rule 51, Nuisance; and County of San Diego Grading Ordinance, which requires the implementation of dust control measures and SDAPCD Rule 55. SDAPCD Rule 55 requires the implementation of dust control measures such as application of water to graded/exposed surfaces and during loading/unloading activities, wheel-washing or other means to minimize track out dust on vehicles entering/leaving the project site, stabilization of dirt piles, and hydroseeding of graded areas to minimize dust emissions from exposed surfaces. To account for standard dust control measures, it was assumed that watering three times per day would reduce particulate matter emissions by 61 percent; reducing speeds on unpaved surfaces to 15 miles per hour; and paved roads would be cleaned which would have a control effectiveness of 25 percent for particulate matter emissions (see Air Quality Assessment for details). It was also assumed that architectural

¹ California Air Pollution Control Officers Association. 2013. *California Emissions Estimator Model (CalEEMod) Version 2013.2.2*. Available at: <http://www.caleemod.com/>.

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coatings would be compliant with SDAPCD Rule 67.0.1, which limits VOC content to 100 grams per liter (g/l) for exterior paints and 50 g/l for interior paints. The maximum daily estimated construction emissions are summarized in Table 2 below (see Appendix B for modeling results).

Table 2 Maximum Daily Estimated Construction Emissions (lb/day)

| Emission Source | VOC | NO_x | CO | SO_x | PM₁₀ | PM_{2.5} |
|--|--------------|-----------------------|--------------|-----------------------|------------------------|-------------------------|
| Grading | | | | | | |
| Fugitive Dust | - | - | - | - | 2.43 | 1.30 |
| Off-road Diesel | 3.00 | 31.07 | 24.00 | 0.03 | 1.72 | 1.58 |
| Haul Trips | 0.00 | 0.00 | 0.03 | 0.00 | 0.00 | 0.00 |
| Worker Trips | 0.04 | 0.05 | 0.55 | 0.00 | 0.12 | 0.03 |
| Total | 3.04 | 31.12 | 24.58 | 0.03 | 4.27 | 2.91 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Building Construction | | | | | | |
| Off-Road Diesel | 2.67 | 23.26 | 17.53 | 0.03 | 1.49 | 1.40 |
| Vendor Trips | 0.23 | 1.91 | 2.49 | 0.01 | 0.19 | 0.07 |
| Worker Trips | 0.48 | 0.57 | 6.13 | 0.02 | 1.38 | 0.37 |
| Total | 3.38 | 25.74 | 26.15 | 0.06 | 3.06 | 1.84 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Paving | | | | | | |
| Off-Road Diesel | 1.43 | 14.94 | 14.37 | 0.02 | 0.81 | 0.74 |
| Worker Trips | 0.04 | 0.05 | 0.51 | 0.00 | 0.12 | 0.03 |
| Total | 1.47 | 14.99 | 14.88 | 0.02 | 0.93 | 0.77 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Architectural Coatings | | | | | | |
| Architectural Coating | 14.07 | - | - | - | - | - |
| Off-Road Diesel | 0.27 | 1.84 | 1.84 | 0.00 | 0.13 | 0.13 |
| Worker Trips | 0.09 | 0.10 | 1.12 | 0.00 | 0.27 | 0.07 |
| Total | 14.43 | 1.94 | 2.96 | 0.00 | 0.40 | 0.20 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Maximum Simultaneous Emissions¹ | 18.90 | 40.15 | 42.97 | 0.08 | 4.27 | 2.92 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| CO = carbon monoxide; lb/day = pounds per day; NO _x = nitrous oxides; PM ₁₀ = respirable particulate matter; PM _{2.5} = fine particulate matter; SO _x = sulfur oxides; VOC = volatile organic compound Source: Modeled in 2015 using CalEEMod Version 2013.2.2 ¹ Maximum VOC, NO _x , CO, and SO _x emissions occur during simultaneous building construction, paving, and architectural coatings application. Maximum PM ₁₀ and PM _{2.5} emissions occur during grading. | | | | | | |

As shown in Table 2, maximum simultaneous emissions are below the screening-level thresholds for all criteria air pollutants and precursors.

Project operational activities include traffic, area sources (i.e., consumer products), energy use, and landscaping. Project operations were quantified using CalEEMod, assuming an operational year of 2020. Though it was assumed in the analysis that fireplaces would be natural gas and would only be in the retirement community dwellings, the MUP will include a condition prohibiting any fireplaces in the project. According to the project-specific traffic study, vehicle trips generated by the project include 2.5 trips per assisted living unit and 4 trips per retirement community unit. The project buildout emissions are summarized in Table 3 below (see Appendix B for modeling results).

Table 3 Total Operational Emissions

| Emission Source | VOC | NO_x | CO | SO_x | PM₁₀ | PM_{2.5} |
|---|--------------|-----------------------|--------------|-----------------------|------------------------|-------------------------|
| Summer (lb/day) | | | | | | |
| Area Sources | 7.70 | 0.22 | 19.21 | 0.00 | 0.22 | 0.22 |
| Energy Use | 0.06 | 0.50 | 0.21 | 0.00 | 0.04 | 0.04 |
| Vehicular Emissions | 2.13 | 4.43 | 21.52 | 0.06 | 4.34 | 1.21 |
| Total | 9.89 | 5.15 | 40.95 | 0.07 | 4.60 | 1.46 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Winter (lb/day) | | | | | | |
| Area Sources | 7.70 | 0.22 | 19.21 | 0.00 | 0.22 | 0.22 |
| Energy Use | 0.06 | 0.50 | 0.21 | 0.00 | 0.04 | 0.04 |
| Vehicular Emissions | 2.25 | 4.71 | 22.55 | 0.06 | 4.34 | 1.21 |
| Total | 10.02 | 5.43 | 41.98 | 0.06 | 4.60 | 1.46 |
| Screening-Level Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| Annual (tpy) | | | | | | |
| Area Sources | 1.32 | 0.02 | 1.73 | 0.00 | 0.01 | 0.01 |
| Energy Use | 0.01 | 0.09 | 0.04 | 0.00 | 0.01 | 0.01 |
| Vehicular Emissions | 0.39 | 0.85 | 3.99 | 0.01 | 0.77 | 0.21 |
| Total | 1.72 | 0.96 | 5.76 | 0.01 | 0.79 | 0.23 |
| Screening-Level Thresholds | 13.7 | 40 | 100 | 40 | 15 | 10 |
| Above Screening-Level Thresholds? | No | No | No | No | No | No |
| CO = carbon monoxide; lb/day = pounds per day; NO _x = nitrous oxides; PM ₁₀ = respirable particulate matter; PM _{2.5} = fine particulate matter; SO _x = sulfur oxides; tpy = tons per year; VOC = volatile organic compound Source: Modeled in 2015 using CalEEMod Version 2013.2.2 ¹ Maximum VOC, NO _x , CO, and SO _x emissions occur during simultaneous building construction, paving, and architectural coatings application. Maximum PM ₁₀ and PM _{2.5} emissions occur during grading. | | | | | | |

As shown in Table 3 above, emissions associated with project operations are below the County's screening-level thresholds for all criteria air pollutants.

Projects involving traffic impacts may result in the formation of locally high concentrations of carbon monoxide (CO), known as CO "hot spots". The project-specific traffic study² evaluated whether or not there would be a decrease in the level of service (LOS) at the roadways and/or

² LOS Engineering. 2015. *Skyline Retirement Center – Draft Traffic Impact Study*.

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intersections affected by the project. According to the traffic study, the project would not result in a degradation in LOS to E or worse at any of the study intersections. The project would not result in a CO hot spot due to its trip generation. Therefore, impacts would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County is presently in non-attainment under the California ambient air quality standard (CAAQS) and the National Ambient Air Quality Standards for ozone (O₃). San Diego County is also presently in non-attainment for the annual geometric mean for particulate matter less than or equal to 10 microns (PM₁₀) and particulate matter less than or equal to 2.5 microns (PM_{2.5}) and for the 24-hour concentrations of PM₁₀ under the CAAQS. Ozone is formed when VOCs and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of NO_x include automobiles, trucks and various non-road vehicles (e.g., construction equipment, boats, etc.) as well as industrial sources such as power plants, industrial boilers, cement kilns, and turbines. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact: An air quality report titled "Air Quality Assessment for the Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (September 2016). Air emissions associated with the project include emissions of PM₁₀, PM_{2.5}, NO_x, and VOCs from project construction and operations. Grading activities associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. Furthermore, as shown in III(b) above, project construction and operational-emissions would be below the County's screening-level thresholds for all criteria air pollutants.

In addition, a list of past, present and future projects within the surrounding area were evaluated and none of these projects emit significant amounts of criteria pollutants. Refer to XIX. Mandatory Findings of Significance for a comprehensive list of the projects considered. The proposed project as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria established by the County of San Diego Guidelines for Determining Significance, therefore, the construction and operational emissions

associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM₁₀, PM_{2.5}, or any O₃ precursors.

d) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

Less Than Significant Impact: An air quality report titled "Air Quality Assessment for the Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (September 2016). The proposed project would result in short-term diesel exhaust emissions from onsite construction equipment. The amount of diesel particulate matter emissions varies with project schedule and construction phasing. A health risk assessment was conducted to determine the potential impact associated with exposure to diesel particulate matter. The on-site construction equipment diesel particulate matter emissions quantified by CalEEMod was a total of 0.343 tons for the duration of project construction. The construction equipment sources were modeled as a series of elevated volume sources, as recommended in the SCAQMD's 2003 *Final Localized Significance Threshold Methodology*, in U.S. Environmental Protection Agency's (EPA's) approved air dispersion model, AERMOD. Preprocessed meteorological data was obtained for the El Cajon monitoring station provided by San Diego Air Pollution Control District. Risk impacts were estimated in accordance with the Office of Environmental Health Hazard Assessment's (OEHHA's) 2015 *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. The risk predicted was compared to a risk level of 10 in a million significance threshold with the implementation of Toxics Best Available Control Technology (T-BACT). The maximum excess cancer risk predicted at the nearest residential receptor would be 5.36 in a million, which is below the County's significance threshold of 10 in a million with implementation of T-BACT. In accordance with the County's requirements, the project will apply T-BACT by requesting construction contractors to provide 10 percent of the construction fleet that uses any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters, and/or California Air Resources Board (CARB) certified Tier III or IV equipment. In addition, the chronic hazard was calculated based on the potential for adverse non-cancer health effects with exposure to diesel particulate matter. The cancer hazard quotient for construction of the project would be 0.0708, which is below the County's significance threshold of 1.0 (risk calculations are provided in Appendix A of the Air Quality Assessment report).

The project site is surrounded by village residential uses and general commercial uses. These land uses do not include major stationary sources of TACs. The project is located adjacent to Campo Road (SR94). CARB's 2005 *Air Quality and Land Use Handbook* recommends avoiding siting sensitive land uses within 500 feet of an urban road with 100,000 average daily trips. Based on data from California Department of Transportation (Caltrans)³, the segment from Avocado Blvd to Jamacha Road upon which the project is located, has 44,500 average daily trips. The project would, therefore, be consistent with CARB's guidance on siting sensitive receptors. In addition, the project would not create the potential for CO hotspots at intersections, as described in III(b) above. As such, impacts would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: An air quality report titled "Air Quality Assessment for the Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (September 2016). No potential sources of objectionable odors have been identified in association with the proposed project. As such, no direct or cumulative impact from odors is anticipated. Construction activities would take place during the daytime hours when, generally, most people are away from their homes (e.g., school and work), and would be temporary (i.e., 18 months). The proposed project would not result in any new land uses typically considered to be associated with odorous emissions (e.g., refineries, coffee roasters, wastewater treatment plants, landfills etc.). In addition, odorous emissions disperse throughout the air as distance increases from the source. Therefore, considering that construction activities would be limited to the daytime hours, when people are likely not at home, would be temporary, and would disperse with increasing distance from the source, they would not affect a substantial number of people. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and will not contribute to a cumulatively considerable odor impact.

The proposed project is not an agricultural, commercial, or an industrial activity that would generate objectionable odors or place sensitive receptors next to existing objectionable odors, which would affect a considerable number of persons or the public. Therefore, impacts are less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional

³ California Department of Transportation. 2016. *Traffic Census Program*. Available: <http://dot.ca.gov/trafficops/census/>.

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plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: County staff reviewed a Biological Resources Report dated July 10, 2018, prepared by Catherine MacGregor, Senior Biologist at REC Consultants, for the project. Two special-status plant species, Palmer's goldenbrush and San Diego sunflower, and two special-status animal species, California gnatcatcher and orange-throated whiptail, were observed onsite. In addition, evidence of past use by San Diego desert woodrat was observed. Mitigation for impacts to the sensitive species shall be provided through habitat-based mitigation and preservation of California gnatcatcher habitat within a Biological Open Space Easement. Impacts to Palmer's goldenbrush will be mitigated through preservation of individuals within the Biological Open Space Easement. San Diego sunflower individuals are predominantly within an area identified as "Not A Part" and will be largely avoided by project impacts. These mitigation measures in conjunction with standard avoidance measures, such as temporary fencing, biological monitoring, and avoiding grading during the avian breeding season, will reduce the project's impacts to below a level of significance. Therefore, impacts to candidate, sensitive and special status species would be less than significant with the incorporated mitigation.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: County staff reviewed a Biological Resources Report dated July 10, 2018, prepared by Catherine MacGregor, Senior Biologist at REC Consultants, for the project. Staff have determined that the proposed project site does not contain riparian vegetation/habitat, with the exception of a drainage channel, located in the southeastern corner of the project site, which supports the growth of three arroyo willows. The drainage is located outside the MUP boundary in an area protected as "Not a Part." In the case of a Minor or Major Use Permit, areas designated as "Not a Part" "are protected just as areas within an open space easement" (County of San Diego 2010b). Through protection as "Not a Part" and establishment of a buffer of 25 to 50 feet with no fuel management permitted, this drainage area would be protected from project impacts. The project would result in significant impacts to approximately 5.6 acres of sensitive Diegan

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coastal sage scrub, 0.6 acres of non-native grassland, raptor foraging habitat, and unique coast cholla patches which provide suitable habitat for coastal cactus wren. Mitigation for habitat impacts will be provided by conserving 6.6 acres of coastal sage scrub (1.5:1 mitigation ration) and 2.7 acres of southern riparian woodland (1:1 mitigation ratio, up-tiered) in offsite Biological Open Space. Coast cholla will be salvaged through translocation into the US Fish and Wildlife Service's San Diego National Wildlife Refuge. These mitigation measures, in conjunction with standard avoidance measures, will reduce the project impacts to below a level of significance. Therefore, project impacts to riparian habitat and other sensitive natural communities would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant: County staff reviewed a Biological Resources Report dated July 10, 2018, prepared by Catherine MacGregor, Senior Biologist at REC Consultants, for the project. Staff have determined that the proposed project site does not propose significant impacts to wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. A drainage channel exists in the eastern portion of the site that qualifies as a non-wetland jurisdictional water of the U.S./State. The site also contains a small Resource Protection Ordinance (RPO) wetland in the southeastern boundary. The non-wetland drainage will be protected by a buffer of 25 to 48 feet onsite while an RPO wetland will be protected by a 50-foot buffer. The existing drainage and RPO wetland on site is located outside the MUP boundary in an area protected as "Not a Part." In the case of a Minor or Major Use Permit, areas designated as "Not a Part" "are protected just as areas within an open space easement" (County of San Diego 2010b). No fuel modification will encroach upon the buffer because the Project design was modified to prevent such an impact. Through protection as "Not a Part" and establishment of a buffer with no fuel management, the drainage will be protected from project impacts. Therefore, impacts to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

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Discussion/Explanation:

Less than Significant: County staff reviewed a Biological Resources Report dated July 10, 2018, prepared by Catherine MacGregor, Senior Biologist at REC Consultants, for the project. Staff have determined that the site has limited biological value for wildlife movement. The project site would not significantly impede the movement of any native resident or migratory fish or wildlife species or prohibit the use of an established native resident or migratory wildlife corridors. Use of native wildlife nursery sites would not be expected as a result of the proposed project. These findings are based on the following reasons:

1. The site is likely too urbanized and isolated from undeveloped areas to support large mammals.
2. The Project area is an infill in a developed neighborhood and does not likely serve as a wildlife corridor.
3. Wildlife would need to traverse expanses of developed areas or cross the six lane SR 94 to enter the project area.

Therefore, project impacts to the movement of native resident or migratory fish or wildlife species, movement through established native resident or migratory wildlife corridors, and impediments to the use of native wildlife nursery sites would be less than significant.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: County staff reviewed a Biological Resources Report dated July 10, 2018, prepared by Catherine MacGregor, Senior Biologist at REC Consultants, for the project. Staff have determined that the proposed project site is within the Metro-Jamul-Lakeside segment of the County's Multiple Species Conservation Program (MSCP). The project would directly impact Diegan coastal sage scrub habitat, non-native grassland, two-special status plant species, two special-status animal species, a unique habitat feature, and raptor foraging habitat. These impacts would occur within the MSCP County Subarea Plan and mitigation would be required. Mitigation ratios vary depending on the MSCP Tier of the habitat to be impacted and whether or not the impacted land and mitigation site meet the criteria for a Biological Resource Core Area (BRCA). Mitigation ratios are based on the County's Biological Mitigation Ordinance (BMO). It has been determined that both the impact site and mitigation sites are BRCA's. Based on the BRCA status of

both the impact area and mitigation areas, Table 4 has been created below to show the mitigation for habitat impacts:

Table 4 Mitigation for Habitat Impacts

| Habitats | Total Net Impacts (ac) | Mitigation Ratio | Mitigation Required (ac) | Habitat Available in Mitigation Parcels (ac) | Mitigation Parcel Acreage to be Used for Project Mitigation |
|-------------------------------------|------------------------|------------------|--------------------------|--|---|
| Diegan coastal sage scrub (Tier II) | 5.8 | 1:5:1 | 8.7 | 6.6 ³ | 6.6 + 2.1 SRW up-tier = 8.7 |
| Non-native grassland (Tier III) | 0.6 | 1:1 | 0.6 | 0.0 | 0.6 SRW up-tier |
| Southern Riparian Woodland (Tier I) | | | | 7.0 | |
| Total | 6.4 | | 9.3 | | 9.3 |

Implementation of the mitigation above, in combination with standard avoidance/ mitigation measures, would reduce any conflict with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources to a level below significance.

V. CULTURAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

No Impact: A cultural and historical resources report titled "Cultural Resource Survey and Testing for the Skyline Retirement Center, San Diego County, California" was completed by Scott H. Kremkau for the proposed project (November 2017). No historical resources were identified during the cultural resources study. Therefore, the project would not result in impacts to historical resources.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

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

Discussion/Explanation:

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Less Than Significant With Mitigation Incorporated: A cultural and historical resources report titled "Cultural Resource Survey and Testing for the Skyline Retirement Center, San Diego County, California" was completed by County-approved archaeologist Scott H. Kremkau for the proposed project (November 2017). No newly identified archaeological resources were identified during the cultural survey. The South Coastal Information Center records search for the project identified two archaeological resources mapped within the project site. These resources include a bedrock milling site (CA-SDI-5064) and a lithic and ceramic scatter (CA-SDI-5066). Archaeological site CA-SDI-5064 was not re-located during the cultural survey, and is assumed to have been destroyed over time due to grading and other disturbances. Testing was conducted at CA-SDI-5066. It was determined that the site does not qualify as a significant resource. Therefore, it has been determined that the archaeological resources are not significant pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, Section 15064.5. There is the possibility of encountering subsurface cultural resources during grading and construction activities. Mitigation to reduce impacts to unknown, buried, resources to less than significant will consist of the implementation of an archaeological monitoring program that will include a Kumeyaay Native American monitor.

c) Directly or indirectly destroy a unique geologic feature?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

No Impact: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources.

Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance.

The project has marginal potential for containing paleontological resources and will excavate the substratum and/or bedrock below the soil horizons. A monitoring program implemented by the excavation/grading contractor will be required. Equipment operators and others involved in the excavation shall monitor for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the Project Planning Division shall be notified, and a Qualified Paleontologist shall be retained by the applicant to inspect the find to determine if it is significant.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented. If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter will be submitted to the Planning & Development Services identifying who conducted the monitoring and that no fossils were found. If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

With the implementation of the above project requirements during project grading operations, potential impacts to paleontological resources will be less than significant. Furthermore, the project will not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas will be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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No Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Scott H. Kremkau, it has been determined that the project will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report entitled, "Cultural Resource Survey and Testing for the Skyline Retirement Center, San Diego County, California" (November 2017).

VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

- ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: A geology and soils report titled "Geotechnical Investigation Proposed Skyline Retirement Center" was completed by Construction Testing and Engineering, Inc. for the proposed project (October 17, 2016). To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. The County's Grading Ordinance requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the Grading Ordinance ensures the project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

- iii. Seismic-related ground failure, including liquefaction?

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- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poorly-consolidated soils that are saturated or have the potential to become saturated. Therefore, there will be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. A geotechnical investigation report prepared by Construction Testing & Engineering, Inc. dated October 17, 2016, on file with Planning & Development Services as Environmental Review Number PDS2016-ER-16-19-00, has determined that the area does not show evidence of landslides and the potential for landsliding is low, provided surface drainage is controlled and maintained, and site grading and slope requirements are performed as recommended. Therefore, there will be a less than significant impact from adverse effects of landslides.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: According to the Soil Survey of San Diego County, the on-site soils are identified as PfC Placentia sandy loam, 2 to 9 percent slopes; FxG Friant rocky fine

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sandy loam, 30 to 70 percent slopes; and VaB Visalia sandy loam, 2 to 5 percent slopes. The soils on site have a soil erodibility rating of "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

- 1) The project will not result in unprotected erodible soils; will not alter existing drainage patterns; and is not located in a floodplain, wetland, or significant drainage feature.
- 2) The project is required to prepare a Storm Water Quality Management Plan and implement Best Management Practices to ensure sediment does not erode from the project site.
- 3) The project involves grading. However, the project is required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations minimizes the potential for water and wind erosion.

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

In addition, the project will not contribute to a cumulatively considerable impact because all of the past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Stormwater Standards Manual adopted on February 20, 2002, and amended January 10, 2003 and August 5, 2003 (Ordinance Nos. 9426, 9518, and 9589). Refer to XIX. Mandatory Findings of Significance for a comprehensive list of the projects considered.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: A geology and soils report titled "Geotechnical Investigation Proposed Skyline Retirement Center" was completed by Construction Testing and Engineering, Inc. for the proposed project (October 2016). In order to assure that any proposed buildings (including those proposed on the project site) are adequately supported (whether on native soils, cut or fill), a Soils Engineering Report is required as part of the Building Permit process. This

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Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that the site is suitable for development when structures are constructed in accordance with structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: A geology and soils report titled "Geotechnical Investigation Proposed Skyline Retirement Center" was completed by Construction Testing and Engineering, Inc. for the proposed project (October 2016). The project contains some expansive soils as defined by Table 18-1-B of the Uniform Building Code (1994) in the southern portion of the site. According to the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973, the soils in this area are PfC Placentia sandy loam, 2 to 9 percent slopes. These soils have a high shrink-swell behavior. The site is also underlain by FxG Friant rocky fine sandy loam, 30 to 70 percent slopes and VaB Visalia sandy loam, 2 to 5 percent slopes with a low shrink swell behavior. Despite a portion of the site being underlain by expansive soils, the project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project will rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed.

VII. GREENHOUSE GAS EMISSIONS – Would the project

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact With Mitigation Incorporated: A greenhouse gas analysis report titled “Global Climate Change Evaluation for Skyline Retirement Center” was completed by Scientific Resources Associated for the proposed project (December 2017). Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, hydrofluorocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region⁴ identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 43 percent of the total regional emissions. Electricity and natural gas combustion were the second (24 percent) and third (9 percent) largest regional contributors, respectively, to regional GHG emissions.

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

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

Senate Bill (SB) 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. The San Diego Association of Governments (SANDAG) has prepared the region's Sustainable Communities Strategy (SCS) and the 2050

⁴ San Diego County Greenhouse Gas Inventory: *An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets Revised and Updated to 2010*. University of San Diego and the Energy Policy Initiatives Center (EPIC), March 2013.

Regional Transportation Plan (RTP) which are elements of the *San Diego Forward: The Regional Plan*. The strategy identifies how regional GHG reduction targets, as established by CARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego's General Plan, adopted in 2011, incorporates various climate change goals and policies. These policies provide direction for individual development projects to reduce GHG emissions.

The County adopted a Climate Action Plan (CAP) in February 2018. The CAP was prepared as a qualified plan for reduction of GHG emissions and provides streamlining provisions for projects that can demonstrate consistency with the CAP. The CAP established the following threshold of significance for GHG emissions:

A proposed project would have a less than significant cumulatively considerable contribution to climate change impacts if it is found to be consistent with the County's Climate Action Plan; and, would normally have a cumulatively considerable contribution to climate change impacts if it is found to be inconsistent with the County's Climate Action Plan.

The CAP includes a CAP Consistency Review Checklist to implement GHG reduction measures from the CAP that apply to new development projects. The Checklist follows a two-step process to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County's adopted GHG thresholds of significance. The Checklist first assesses a project's consistency with the growth projections and land use assumptions that formed the basis of CAP emissions projections. If a project is consistent with the projections and land use assumptions in the CAP, its associated growth in terms of GHG emissions would have been accounted for in the CAP's projections and project implementation of the CAP reduction measures will contribute towards reducing the County's emissions and meeting the County's reduction targets.

The proposed project site currently is in the General Plan Regional Category 'No Jurisdiction' and the General Plan Land Use Designation Open Space Conservation (OS-C). The project proposes a General Plan Amendment to change the Regional Category to Village and the Land Use Designation to Village Residential 30 (VR-30). The current zoning (Use Regulations) on the property is Transportation and Utility Corridor (S94). The project proposes a Rezone to change the Use Regulations to Urban Residential (RU).

The CAP Consistency Review Checklist was completed for the project. The proposed project requires a General Plan Amendment and a Zoning Reclassification that would result in a more GHG-intensive project when compared to existing designations that were accounted for in the CAP. Projects that may result in a more GHG-intensive project compared to existing designations as included in the CAP, the project must prepare a separate, more detailed project-

level GHG analysis. As outlined in the County's Guidelines for Determining Significance for Climate Change and Report Format and Content Requirements for Climate Change, this analysis must demonstrate how the project would offset the increase in GHG emissions over the existing designations. The project must also incorporate each of the CAP measures identified in Step 2 to mitigate cumulative GHG emissions impacts.

The project would comply with applicable measures in Step 2 of the Checklist. These measures will be included as conditions of approval for the project. Residential-related measures from the CAP checklist would apply to the project because the project does not propose a commercial use.

In addition, the project's GHG emissions were quantified to determine the amount necessary to be reduced above existing designations. A greenhouse gas analysis report titled "Global Climate Change Evaluation for Skyline Retirement Center" was completed by Scientific Resources Associated for the proposed project (December 2017). GHG emissions associated with construction including emissions from construction equipment, truck traffic, and worker trips were quantified using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 computer program.⁵ The project proposes to construct a full-service senior living facility with up to 232 housing units divided between 85 retirement units and 147 congregate care units on approximately 8 acres. Modeling was based on project-specific information (e.g., land use type, land use size, construction schedule) where available, and default values in CalEEMod that are based on the project's location and land use type. Construction is scheduled to begin in 2018. The total construction emissions were estimated to be 981 metric tons of carbon dioxide-equivalent (MTCO_{2e}). Amortized over 30 years, construction-generated GHG emissions were estimated to be 33 MTCO_{2e} annually and added to operational-generated GHG emissions.

To evaluate the loss in carbon sequestration attributable to removal of the scrub vegetation on site, it was assumed that 50 percent of the existing site is occupied by scrub vegetation and 50 percent is disturbed area. The loss in carbon sequestration was estimated to be 57 MTCO_{2e}. Amortized over 30 years, the annualized loss in carbon sequestration was estimated to be 2 MTCO_{2e} annually and added to operational-generated GHG emissions.

Operational GHG emissions were quantified using CalEEMod for area, energy use, water use, solid waste, and transportation sources. It was assumed that none of the assisted living units or retirement community units would be equipped with a fireplace. The energy intensity factors were adjusted to reflect San Diego Gas & Electric's (SDG&E's) attempt to achieve the SB 350 requirement to achieve 33 percent Renewable Portfolio Standard (RPS) by 2020 and 50 percent RPS by 2030. Buildings would be designed to meet the California 2016 Title 24 Building Energy Efficiency Standards. It was also assumed that the residential structures would be equipped with EnergyStar appliances. Furthermore, it was assumed that the residential structures would be equipped with low-flow water fixtures and water-efficient irrigation systems to reduce outdoor water use by 6.1 percent. The project was conservatively assumed to reduce its solid waste generation by 20 percent to meet the goals set forth by AB 341 that not less than 75 percent of

⁵ California Air Pollution Control Officers Association. 2016. *California Emissions Estimator Model (CalEEMod) Version 2016.3.1*. Available at: <http://www.caleemod.com/>.

solid waste generated by source to be reduced, recycled, or composted by the year 2020. According to the project-specific traffic study, vehicle trips generated by the project include 2.5 trips per assisted living unit and 4 trips per retirement community unit⁶. The trip lengths were based on default urban trip lengths within CalEEMod. The project would be operational in 2020.

Project-generated GHG emissions are shown below in Table 4 (see Appendix A for modeling results).

Table 4 Summary of Project's Greenhouse Gas Emissions with Reduction Measures

| Emission Source | Annual MTCO_{2e} |
|---|---------------------------------|
| Area Source | 3 |
| Electricity Use | 256 |
| Natural Gas Use | 110 |
| Water Consumption | 81 |
| Solid Waste Handling | 70 |
| Vehicles | 818 |
| Amortized Construction | 33 |
| Amortized Land Use Change | 2 |
| Total Emissions | 1,373 |
| MTCO _{2e} = metric tons carbon dioxide equivalent Source: Modeled in 2017 using CalEEMod Version 2016.3.1 | |

As shown above, the project's combined GHG emissions associated with the project would generate a total of 1,373 MTCO_{2e} annually. The project's existing designation would only allow for open space on the site, therefore, the project's emissions represent an increase from zero compared to CAP emissions projections. As such, the project could generate GHG emissions that may conflict with the County's CAP and may have a significant impact on the environment, and impacts could be considered potentially significant.

To fully mitigate the impact of GHG emissions, the project would purchase and retire carbon offsets, over a 30-year period, the operational GHG emissions from that incremental amount of development to net zero.

Total combined project GHG emissions for years 2020 through 2049 are summarized in Table 5 below (see Appendix A for modeling results).

Table 5 Total Greenhouse Gas Emissions – Years 2020 through 2049

| Year | Annual MTCO_{2e} |
|-------------|---------------------------------|
| 2020 | 1,266 |
| 2021 | 1,237 |
| 2022 | 1,207 |
| 2023 | 1,174 |

⁶ LOS Engineering. 2015. *Skyline Retirement Center Draft Traffic Impact Assessment*.

| | |
|--|---------------|
| 2024 | 1,144 |
| 2025 | 1,115 |
| 2026 | 1,089 |
| 2027 | 1,066 |
| 2028 | 1,045 |
| 2029 | 1,026 |
| 2030 | 1,008 |
| 2031 | 999 |
| 2032 | 991 |
| 2033 | 984 |
| 2034 | 978 |
| 2035 ^a | 974 |
| 2040 ^a | 963 |
| 2045 ^a | 963 |
| Total 30-year Period | 30,843 |
| MTCO _{2e} = metric tons carbon dioxide equivalent Source: Modeled in 2017 using CalEEMod Version 2016.3.1 ^a CalEEMod does not calculate individual years between 2035 and 2050; therefore, it was conservatively assumed that GHG emissions in 2035 represented GHG emissions for years 2035 through 2039; 2040 represented GHG emissions for years 2040 through 2044; and 2045 represented GHG emissions for years 2045 through 2049. | |

The project would purchase and retire a total of 31,881 MTCO_{2e} in carbon offsets to fully offset the project's impacts. The utilization of carbon offsets to mitigate GHG emissions is expressly authorized by CEQA Guidelines Section 15126.4(c)(3)-(c)(4), and would reduce impacts associated with the project to a less than significant level. This finding is consistent with the County's Guidelines for Determining Significance for Climate Change impacts. The impact would be less than significance with mitigation that requires purchase of carbon offset credits.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact With Mitigation Incorporated: As described under VII(a) above, the project would comply with all applicable measures from the County's CAP Consistency Review Checklist as conditions of approval and would implement mitigation measures to reduce the incremental increase in emissions from the proposed development to net zero. Therefore, the project would not conflict with the County's CAP which was intended to meet the County's GHG reduction targets consistent with AB 32 and SB 32. Therefore, this impact would be less than significant with mitigation incorporated.

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

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Rancho San Diego Kinder Care pre-school is located adjacent to the most northern portion of the project site. However, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or wastes. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The project would have less than significant impacts.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

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Discussion/Explanation:

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

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

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

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

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

iii. OIL SPILL CONTINGENCY ELEMENT

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

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iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

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

v. DAM EVACUATION PLAN

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

Implementation of these fire safety standards will occur during the building permit process. Also, a Fire Service Availability Letter with conditions, dated March 8, 2016, has been received from the San Miguel Consolidated Fire Protection District. The conditions from the San Miguel Consolidated Fire Protection District include: fire sprinklers in all structures; placement of visible and legible street numbers and addresses; fire apparatus access roads required for every building constructed when any portion of an exterior wall of the first story located more than 150 feet from the closest point of fire department vehicle access, including private residential driveways; provide and maintain signage identifying fire apparatus access roads; roads and driveways more than 150 feet in length must have an approved means for turning the fire apparatus around; and provision of fire hydrants. The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be 4 minutes. The Maximum Travel Time allowed pursuant to the County Safety Element is 5 minutes.

The San Miguel Consolidated Fire Protection District also reviewed and approved a Fire Protection Plan—Letter Report (REC Consultants, April 23, 2018) prepared for the project. The

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Fire Protection Plan—Letter Report describes how the project will provide required facilities and maps Fuel Management Zones around buildings.

In addition to approval by the San Miguel Consolidated Fire Protection District, the San Diego County Fire Authority also reviewed the project. Therefore, based on the review of the project by the San Miguel Consolidated Fire Protection District, San Diego County Fire Authority, through compliance with the County Fire Code, and through compliance with the San Miguel Consolidated Fire Protection District conditions, and consistency with the Fire Protection Plan—Letter Report, the project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the County Fire Code.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not involve or support uses that allow untreated water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). The project includes the construction of a pool, which would be treated with chlorine and other approved chemicals to prevent mosquito breeding. Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by County staff Jeff Smyser on April 4, 2018 there are none of these uses on adjacent properties. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

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

- a) Violate any waste discharge requirements?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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Less than Significant Impact: A hydrology and water quality report titled "CEQA Drainage Study for Skyline Retirement Center" was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project SWQMP was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The project will be a retirement facility which is proposing to disturb approximately nine acres of undeveloped land in order to accommodate site development and will be required to implement proper erosion control measures under the Construction General Permit (CGP) and Municipal Separate Storm Sewer System (MS4). The development of the project will create approximately four acres of impervious surfaces which facilitate and concentrate post project runoff. Measures have been included to accommodate the 100 year storm event flows and attenuate these flows to predeveloped conditions.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: A hydrology and water quality report titled "CEQA Drainage Study for Skyline Retirement Center" was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project SWQMP was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The proposed Best Management Practices (BMPs) are consistent with regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result the project will not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act (CWA) Section 303(d). Regional surface water and storm water permitting regulation for County of San Diego includes the following: San Diego Region, Order No. R9-2013-0001, (NPDES No. CAS 0109266); County Watershed Protection Ordinance (WPO); Stormwater Management, and Discharge Control Ordinance No. 10410; and the County BMP Design Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. With the implementation of BMPs and consistency with the above mentioned regulations, impacts would be less than significant.

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

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- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: A hydrology and water quality report titled “CEQA Drainage Study for Skyline Retirement Center” was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project SWQMP was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The Regional Water Quality Control Board has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the 909 Sweetwater hydrologic basin, within the 909.21 Jamacha hydrologic subarea that has the following existing and potential beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground water: municipal and domestic supply; agricultural supply; industrial process supply, industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; preservation of biological habitats of special significance; and rare, threatened, or endangered species habitat.

The project proposes the following potential sources of polluted runoff: Sediment, Nutrients, Heavy Metals, Trash, Debris, Oxygen Demanding Substances, Oil, Grease, Bacteria, Viruses, and Pesticides. However, the following site design measures, source control BMPs, and treatment control BMPs will be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the proposed project will not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses: preservation of existing vegetation, mulch, energy dissipators, silt fencing, sediment/desilting basin, fiber rolls, gravel/sand bags, storm drain inlet protection, trash storage areas, outlet protection, minimization of disturbances to natural drainages and minimization of impervious surfaces.

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

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

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- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The project will obtain its water supply from the Otay Water District that obtains water from surface reservoirs or other imported water source. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: A hydrology and water quality report titled "CEQA Drainage Study for Skyline Retirement Center" was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project Storm Water Quality Management Plan (SWQMP) was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The project proposes the construction of storm water facilities that are designed to filter pollutants prior to discharge as well as detaining erosive flows that can create downstream reach instability. As outlined in the SWQMP dated September 11, 2017 and prepared by REC Consultants, Inc., the project will implement the following site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff: preservation of existing vegetation, mulch, energy dissipators, silt fencing, sediment/desilting basin, fiber rolls, gravel/sand bags, storm drain inlet protection, trash storage areas, outlet protection, minimization of disturbances to natural drainages and minimization of impervious surfaces. These measures will control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2013-0001), as implemented by the 2013 MS4 Permit and San Diego County BMP Design Manual (BMP DM). The SWQMP specifies and describes the implementation process of all BMPs that will address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The Department of Public Works will ensure that the Plan is implemented as proposed. Due to these factors, it has been found that the project will not result in significantly increased erosion or sedimentation potential and will not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation will be controlled within the

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boundaries of the project, the project will not contribute to a cumulatively considerable impact. For further information on soil erosion refer to VI., Geology and Soils, Question b.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons, based on a Drainage Study prepared by REC Consultants, Inc. on September 13, 2017:

- Drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- The project will not increase surface runoff exiting the project site equal to or greater than one cubic foot/second.

Therefore, the project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Additionally, there is an existing watercourse that traverses the north eastern portion of the project site that will remain undisturbed through post project conditions. Moreover, the project will not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project will not substantially increase water surface elevation or runoff exiting the site, as detailed above.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: A hydrology and water quality report titled "CEQA Drainage Study for Skyline Retirement Center" was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project SWQMP was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The proposed project will result in the conversion of four acres (173,626 sf) of previously pervious

land to impervious surfaces. Analysis of the 100-year storm event resulted in findings that showed an increase of 5.3 CFS would be generated from site development. Detention Basins were designed to mitigate the increased flow rates and to reduce them to pre-developed conditions or less. The CEQA drainage study prepared by REC Consultants, Inc. provided detention routing calculations that shows a reduction of flow rates between existing conditions and the migrated-developed conditions of 5.3 CFS. Therefore, the project will not contribute runoff water that would exceed the capacity of existing storm water drainage systems.

h) Provide substantial additional sources of polluted runoff?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: A hydrology and water quality report titled "CEQA Drainage Study for Skyline Retirement Center" was completed by REC Consultants, Inc. for the proposed project (September 13, 2017) and a County of San Diego Priority Development Project SWQMP was completed by REC Consultants, Inc. for the proposed project (September 11, 2017). The project proposes the following potential sources of polluted runoff: on-site storm drain inlets; interior floor drains and elevator shaft sump pumps; indoor and structural pest control; landscape/outdoor pesticide use; pool; refuse areas; fire sprinkler test water; and plazas, sidewalks and parking lots. Pollutants anticipated from these sources include: Sediment, Nutrients, Heavy Metals, Organic Compounds, Trash & Debris, Oxygen Demanding Substances, Oil & Grease, Bacteria & Viruses, and Pesticides. However, the following site design measures and/or source control BMPs and/or Structural BMPs will be employed such that potential pollutants will be reduced in runoff to the maximum extent practicable: onsite storm drain inlets, storm drain stenciling or signage, interior floor drains and elevator shaft sump pumps, future indoor and structural pest control, and BMPs for landscaping and outdoor pesticide use, water features such as pools, spas, ponds; interior parking garages, plazas, sidewalks, walkways, and parking lots as source control measures. Site design measures to be implemented include maintaining natural drainage courses and waterways; conservation of natural soils, vegetation, and habitat; minimizing impervious surface areas and soil compaction areas, impervious area dispersion, run-off collection, as well as landscaping with native or draught tolerant species. With proper implementation of the aforementioned source control and site design measures, the probability of BMP failure is decreased. Refer to IX Hydrology and Water Quality Questions a, b, c, for further information.

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

| | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: No FEMA mapped floodplains, County-mapped floodplains or drainages with a watershed greater than 25 acres were identified on the project site. Therefore, no impact will occur.

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

| | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: No 100-year flood hazard areas were identified on the project site; therefore, no impact will occur.

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

| | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site lies outside any identified special flood hazard area. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

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

| | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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No Impact: The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

m) Inundation by seiche, tsunami, or mudflow?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

i. SEICHE

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

ii. TSUNAMI

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

iii. MUDFLOW

Less Than Significant Impact: Mudflow is a type of landslide. The site is located within a moderate to high landslide susceptibility zone. However, a Geotechnical Report prepared by Construction Testing & Engineering, Inc. dated October 17, 2016 and Hydrology Report prepared by REC Consultants, Inc. dated September 13, 2017 on file with Planning & Development Services as Environmental Review Number PDS2016-ER-16-19-001 has determined that the area does not show evidence of either pre-existing or potential conditions that could become unstable in the event of seismic activity or exposed soils. Therefore, it is not anticipated that the project will expose people or property to inundation due to a mudflow. Please see section VI, Geology and Soils, for more information.

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

a) Physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

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Discussion/Explanation:

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project site currently is in the General Plan Regional Category 'No Jurisdiction' and the General Plan Land Use Designation Open Space Conservation (OS-C). The project is also subject to the policies of the Valle De Oro Community Plan. The project proposes a General Plan Amendment to change the Regional Category to Village and the Land Use Designation to Village Residential 30 (VR-30). The amendment to the General Plan Land Use Designation must include consideration of project conformance to relevant policies of the Valle De Oro Community Plan. The change in the Land Use Designation also would be an amendment to the Valle De Oro Village Boundary Map, Figure 3 in the Valle De Oro Community Plan, to reflect the change of the Land Use Designation to VR-30.

County staff examined the policies in the Valle De Oro Community Plan, including policies relating to: Community Character, Open Space, Community Design, Mobility, Conservation, and Energy. County staff also reviewed the project and compared it to General Plan policies, including policies in all elements of the General Plan: Land Use, Mobility, Conservation and Open Space, Housing, Safety, and Noise. Staff determined that the proposed project does not conflict with the Valle De Oro Community Plan and that the project is consistent with the proposed General Plan Regional Category and Land Use Designation.

The current zoning (Use Regulations) on the property is Transportation and Utility Corridor (S94). The site formerly was included in planning for a freeway corridor. The project proposes a Rezone to change the Use Regulations to Urban Residential (RU). The proposed RU zoning is consistent with the proposed VR-30 General Plan Land Use Designation, in accordance with the Compatibility Matrix in Section of the Zoning Ordinance. The intent statement for the proposed RU zoning includes the following:

"The RU Use Regulations are intended to create and enhance areas where permanent family residential uses are permitted and institutional residential care uses are

conditionally permitted and civic uses are permitted when they serve the needs of the residents. Typically, the RU Use Regulations would be applied to rural, suburban, or urban areas where adequate levels of public services are available. Various applications of the RU Use Regulations with appropriate development designators can create areas which have a single-family character or areas which, because of the scale of structures, are recognizable as high-density uses”.

The Rezone also includes changing several development regulations designators as follows:

- Animal Regulations change from H to - - (only allows animals typical as household pets)
- Building Height from A (15 feet and one story) to P (60 feet and 4 stories)
- Setback change from B to V (setbacks established by the Major Use Permit)

Multi-family residential development exists on the north of the project site. A large church campus exists on the east. The proposed Rezone includes several development designators for the structures that will create an area consistent with the intent of the RU Use Regulations and that will avoid conflicts in the built environment. In addition, the proposed care facility is included in the category of “Major Impact Services and Utilities”, which is defined as a civic use and which requires a Major Use Permit under the proposed RU zoning. The project proposes a Major Use Permit which includes conditions that also will avoid conflicts in the built environment.

The site is in the Multiple Species Conservation Program (MSCP). The MSCP was developed to conserve both the diversity and function of the County’s rich ecosystem through preservation and adaptive management. A Biological Resource Letter Report (REC, May 11, 2018) was prepared for the project to analyze potential biological impacts. The project will require mitigation of impacts and a minor amendment to include one of the two proposed mitigation sites in the MSCP. Mitigation measures will be included as conditions on project approvals. Therefore, the project is consistent with the MSCP.

For the reasons stated above, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

XI. MINERAL RESOURCES -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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Less Than Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the project site is surrounded by densely developed land uses including single-family residential, multi-family residential, and institutional land uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

XII. NOISE -- Would the project result in:

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project is comprised of a full service senior living facility. Based on a Noise Analysis prepared by LDN Consulting dated April 5, 2017, noise measures are required to ensure the project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive area to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Based on a Noise Analysis prepared by LDN Consulting dated April 5, 2017, the proposed project is subject to the County Noise Element which requires exterior noise sensitive land uses to be 60 dBA CNEL or less. Additionally, anticipated noise exposure levels of 75 dBA CNEL is considered unacceptable and any new construction or development shall not be considered. The location of the project site is immediately adjacent to Campo Road (SR94) and is anticipated to have a high volume of traffic on this roadway. Based on this roadway line source alone, with no topography and no design features considered, future traffic levels of 75 dBA falls within portions of the proposed buildings facing this roadway. Noise measures are required in a form of a noise barrier along Campo Road to reduce the buildings traffic noise exposure level to below 75 dBA CNEL. Additionally, outdoor exterior use areas were assessed throughout the site. Incorporation of noise measures in a form of an eight-foot (8') high noise barrier along Campo Road (SR94) is required to reduce levels to 59.4 dBA CNEL. This noise measure is required to be consistent with the 60 dBA CNEL threshold standard. Due to proposed building facades exposed to future traffic noise levels of 60 dBA CNEL and above, an interior noise assessment will be required prior to issuance of building permits. This will be a condition of approval within the Major Use Permit decision. Therefore, the noise barrier design and interior noise assessment requirement will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404

The project is also subject to the County Noise Ordinance which regulates permanent noise generating operations and activities. Based on a Noise Analysis prepared by LDN Consulting dated April 5, 2017, permanent on-going noise sources associated with the project are comprised of normal residential activities, HVAC units, and pool equipment and pool activities. Ground level equipment were assessed and located at the northern and southern buildings. Roof top mechanical ventilation system will be designed with a proposed parapet wall on each of the buildings and will vary in height, approximately 1-foot higher than the HVAC units to shield them both visually and acoustically. Additionally, screening from intervening proposed buildings would help further reduce noise from the proposed mechanical equipment. Based on the noise report, the northern property line is considered the worst case property line to assess and would generate noise levels as high as 46.7 dBA which is below the arithmetic mean requirement of 47.5 dBA. Operational characteristics of the project comply with the County Noise Ordinance.

Noise Ordinance – Section 36.409

Temporary construction equipment operations are subject to an eight (8) hour average 75 dBA Leq requirement at any occupied property. Based on a Noise Analysis prepared by LDN Consulting dated April 5, 2017, the project site will be graded and constructed in a single phase with construction activities anticipated to be completed prior to occupancy. Two dozers a loader/tractor, a water truck and excavator will be required during the grading activities to complete the proposed grading operations. The equipment will be spread out over the site

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working in different areas for 1-4 weeks and then relocating to a different portion of the site as needed. No blasting and no rock crushing is anticipated during the grading operations. Based on the noise report, grading operation noise level are not anticipated to exceed the 75 dBA eight hour average sound level requirement at the neighboring occupied property lines. Construction operations will occur only during permitted hours of operation pursuant to Section 36.409. To ensure good construction equipment practices, the Major Use Permit will be conditioned to include additional noise reducing measures as part of the grading plan review.

Finally, the project's conformance to the County of San Diego General Plan and County of San Diego Noise Ordinance (Section 36.404 and 36.409) ensures the project will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive areas; and the project will not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the project will not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes residences where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the facilities are set back more than 50 feet from any County Circulation Element (CE) roadway using rubber-tired vehicles with projected groundborne noise or vibration contours of 38 VdB or less; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 50 feet from the roadway centerline for heavy-duty truck activities would insure that these proposed uses or operations do not have any chance of being impacted significantly by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment* 1995, Rudy Hendriks, *Transportation Related Earthborne Vibrations* 2002). This setback insures that this project site will not be affected by any future projects that may support sources of groundborne vibration or groundborne noise related to the adjacent roadways.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area.

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

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project involves the following permanent noise sources that may increase the ambient noise level: activities associated with a senior living center including mechanical equipment associated with air conditioning and pool facility operations. As indicated in the response listed under Section Noise, Question a., the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control.

The project is not expected to expose existing or planned noise sensitive areas to direct noise impacts over existing ambient noise levels based on the Noise Analysis prepared by LDN Consulting dated April 5, 2017. Additionally, the project will not result in cumulative noise impacts because a list of past, present and future projects within in the vicinity were evaluated. It was determined that the project in combination with a list of past, present and future project would not expose existing or planned noise sensitive areas to cumulative noise levels over existing ambient noise levels. Refer to XIX. Mandatory Findings of Significance for a comprehensive list of the projects considered.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor sound systems. Temporary construction equipment operations are subject to an eight (8) hour average 75 dBA Leq requirement at any occupied property pursuant to the County Noise Ordinance. The project site will be graded and constructed in a single phase

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with construction activities anticipated to be completed prior to occupancy. Two dozers, a loader/tractor, a water truck and excavator will be required during the grading activities to complete the proposed grading operations. The equipment will be spread out over the site working in different areas for 1-4 weeks and then relocating to a different portion of the site as needed. No blasting and no rock crushing is anticipated during the grading operations. Based on the noise report, grading operation noise level are not anticipated to exceed the 75 dBA eight hour average sound level requirement at the neighboring occupied property lines. To ensure good construction equipment practices, the Major Use Permit will be conditioned to include additional noise reducing measures as part of the grading plan review. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

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XIII. POPULATION AND HOUSING -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes a retirement residential facility for seniors and to amend the General Plan Regional Category from No Jurisdiction to Village; amend the General Plan Land Use Designation from Open Space—Conservation (OS-C) to Village Residential (VR-30); and amend the Use Regulation (zoning) from Transportation & Utility Corridor (S94) to Urban Residential (RU). However, this physical and regulatory change will not induce substantial population growth in an area because the senior retirement facility will accommodate many residents already living in the area who move from other types of housing, and the project does not include any infrastructure extensions because it can be served with existing water, sanitary sewer, and road infrastructure. Therefore, impacts are less than significant.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not displace any existing housing since the site is currently vacant.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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No Impact: The proposed project will not displace a substantial number of people since the site is currently vacant.

XIV. PUBLIC SERVICES

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

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Based on the service availability forms received for the project, the proposed project will not result in the need for significantly altered services or facilities. Service availability forms have been provided which indicate existing services are available to the project from the following agencies/districts: Otay Water District (water and sewer) and San Miguel Consolidated Fire Protection District. The proposed retirement facility would not house children that will require schools. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

XV. RECREATION

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
|---|--|

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- ☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project does not propose any residential subdivision, mobilehome park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. The project would be used as a full-service, senior living facility with multiple levels of care and facilities. The planned facility grounds include a pool, gym, landscaped courtyard and social grounds, a playground and walking trails. Due to the nature of the proposed facility, it is not expected that residents would utilize off-site recreational facilities to any significant degree. Nonetheless, residents of the project may utilize off-site recreational facilities. Complete dwelling units with kitchens will require a cash in lieu fee for park dedication. With regard to the off-site recreational facilities, due to the extensive acreage of existing publicly owned lands that can be used for recreation, the project will not result in substantial physical deterioration of recreational facilities or accelerate the deterioration of parkland. Moreover, the project will not result in a cumulatively considerable deterioration or accelerated deterioration of recreation facilities because even with all past, present and future residential projects a significant amount of recreational facilities will be available to County residents.

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project involves new on-site recreational facilities. The new facilities include a pool, gym, landscaped courtyard, social grounds, playground and walking trails. However, as outlined in this Environmental Analysis Form, the new facilities will not result in adverse physical effect on the environment because all related impacts from the proposed project, which includes those recreation facilities, have been mitigated to a level below significance. Refer to Sections IV, Biology; V, Cultural Resources; VII Greenhouse Gas Emissions; IX Hydrology and Water Quality; XII, Noise; XVI, Transportation and Traffic and XVIII, Utilities and Service Systems for more information.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant

components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant With Mitigation Incorporated: A Traffic Impact Study, dated September 30, 2015, prepared by LOS Engineering, Inc. was completed for the proposed project. The Traffic Impact Study identified that the proposed project would result in an additional 708 ADT. The project trips would be distributed to Mobility Element Roadways. However, it was found that the project would not have a direct impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project trips do not exceed any of the County's Guidelines for Determining Significance for determining significant direct impacts. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The proposed project generates 708 ADT. These trips will be distributed on Mobility Element roadways in the County, some of which may be projected to operate at inadequate levels of service in the future. The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. These new projects were based on SANDAG regional growth and land use forecasts, the SANDAG Regional Transportation Model was utilized to analyze projected build-out (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies will be corrected through improvement projects funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's Regional Transportation Plan (RTP). This plan, which considers freeway buildout over the next 30 years, will use funds from TransNet, State, and Federal funding to improve freeways to projected level of service objectives in the RTP.

These project trips therefore contribute to a potential significant cumulative impact and mitigation is required. The potential growth represented by this project was included in the growth projections upon which the TIF program is based. By ensuring TIF funds are spent for the specific roadway improvements identified in the TIF Program, the CEQA mitigation requirement is satisfied and the Mitigation Fee nexus is met. Therefore, payment of the TIF, which will be

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required at issuance of building permits, in combination with other components of the program described above, will mitigate potential cumulative traffic impacts to less than significant.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A Traffic Impact Study, dated September 30, 2015, prepared by LOS Engineering, Inc. was completed for the proposed project. The Traffic Impact Study identified that the proposed project would result in an additional 708 ADT. Project trips would be distributed to the following CMP designated facilities: Jamacha Boulevard, Campo Road (SR94), and SR 54. Cumulative impacts were identified to the following Congestion Management Program (CMP) roadways: Jamacha Boulevard, Campo Road (SR94), and SR 54. The following mitigation measures were identified to reduce cumulative impacts to identified CMP facilities to a less than significant level: the applicant shall participate in the TIF program. The incorporation of the identified mitigation would lead to the project not conflicting with the applicable congestion management program because CMP impacts would be fully mitigated.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

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Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter roadway geometry on Campo Road (SR94). Sight distance of 550 feet shall be required at the intersection with Campo Road (SR94) and the private road easement serving the project to the satisfaction of the Director of the Department of Public Works. All road improvements will be constructed according to the County of San Diego Public and Private Road Standards. The proposed project will not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project will not significantly increase hazards due to design features or incompatible uses.

e) Result in inadequate emergency access?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Additionally, roads used to access the proposed project site are up to County standards.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A Traffic Impact Study, dated September 30, 2015, prepared by LOS Engineering, Inc. was completed for the proposed project. The Traffic Impact Study identified that the proposed project would result in an additional 708 ADT and no near-term build-out traffic impacts were identified. The applicant's participation in the TIF program will address potential cumulative impacts to identified CMP facilities, Jamacha Boulevard (SR 54) and Campo Road (SR 94). Therefore, with mitigation, the project will not conflict with policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

XVII. TRIBAL CULTURAL RESOURCES -- Would the project:

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- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or
- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.
- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Pursuant to AB-52, consultation was initiated with culturally affiliated tribes. Formal consultation was conducted with the Lipay Nation of Santa Ysabel and the Jamul Indian Village per their request. No tribal cultural resources were identified during consultation. As such, there are no impacts to tribal cultural resources.

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

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes to discharge domestic waste to a community sewer system that is permitted to operate by the RWQCB. A project facility availability form has been received from the Otay Water District that indicates the district will

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serve the project. Conditions required by the Otay Water District can be seen in Project Facility Availability letter dated March 14, 2016: improvement plans must be reviewed by the District, all District easements must remain clear, and all fees must be paid. Therefore, because the project will be discharging wastewater to a RWQCB permitted community sewer system and will be required to satisfy the conditions listed above, the project is consistent with the wastewater treatment requirements of the RWQCB, including the Regional Basin Plan.

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

| | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: Based on the service availability forms received for the project, new or expanded water or wastewater treatment facilities are required. Service availability forms have been provided which indicate services are available to the project from the following agencies/districts: Otay Water District. Pursuant to the sewer and water service availability form, dated March 14, 2016, the following new onsite water or wastewater facilities must be constructed as a part of the project: water and sewer main extensions, service laterals, backflow devices, meters, among other facilities required by DPW, Water & Sewer districts, and the fire district. The onsite sewer main extensions will replace and relocate the existing onsite sewer main, so the new facilities will not increase the capacity of the existing infrastructure. In addition, as outlined in this Environmental Analysis Form, the new water and wastewater facilities will not result in adverse physical effect on the environment because all related impacts from the proposed project, which includes the water and wastewater facilities, have been avoided due to design elements or mitigated to a level below significance. Refer to Sections IV, Biology; V, Cultural Resources; VII Greenhouse Gas Emissions; IX Hydrology and Water Quality; XII, Noise; XVI, Transportation and Traffic and XVIII, Utilities and Service Systems for more information.

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

| | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: The project involves new and expanded storm water drainage facilities. The new and expanded facilities include three Biofiltration Basins, standard D-75 brow ditches, energy dissipaters, storm drain conveyance network, sewer manholes, catch basins, and

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rerouting of an existing onsite sewer segment. However, as outlined in this Environmental Analysis Form, the new and expanded facilities will not result in adverse physical effect on the environment, because related impacts from the proposed storm water facilities have been avoided due to design elements.

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

| | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project requires water service from the Otay Water District. A Service Availability Letter from the Otay Water District, dated March 14, 2016, has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the project will have sufficient water supplies available to serve the project.

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

| | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project requires wastewater service from the Otay Water District. A Service Availability Letter from the Otay Water District, dated March 14, 2016, has been provided, indicating adequate wastewater resources and entitlements are available to serve the requested wastewater resources. Therefore, the project will have sufficient wastewater service available to serve the project.

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

| | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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Less Than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE:

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated. Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the

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environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biological resources and cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes offsite biological open space with a resource management plan, biological monitoring during construction, and cultural resource monitoring. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

| PROJECT NAME | PROJECT NUMBER |
|---|------------------------|
| AVOCADO VILLAGE COMMERCIAL FACILITY Major Use Permit, Site Plan | P79-011, TM3898 |
| BAILEY SELF STORAGE, Site Plan | PDS2012-3500-12-004 |
| CAMPO ROAD SELF STORAGE Site Plan | PDS2017-STP-17-008 |
| FOOTHILLS UNIT.METHODIST CHURCH Minor Dev | PDS2010-3301-72-337-03 |
| FOOTHILLS UNITED METHODIST CHURCH Minor Dev | PDS2010-3301-72-337-04 |
| JAMACHA MOBIL Landscape Plan | PDS2011-3961-97-005 |
| KRAUSS PROF-COMMERCIAL, SPA84-006 Rezone | PDS2011-3600-84-055 |
| KRUEGER AUTO REPAIR / RETAIL, Site Plan | PDS2011-3500-90-063 |
| NEXT G AT&T MUP CELL SITE; P10-009 Major Use Permit | PDS2010-3300-10-009 |
| RANCHO SAN DIEGO TOWN CENTER Major Use Permit | PDS2001-3300-96-011 |
| RANCHO SAN DIEGO VILLAGE SHOPPING VILLAG Minor Use Permit | PDS2010-3400-95-008 |
| SHERIFF STATION Rezone and Open Space Vacation | PDS2009-3600-09-003 |
| SKYLINE CHURCH, (P88-039, MUP for church) | PDS2001-3300-88-039 |

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| PROJECT NAME | PROJECT NUMBER |
|--|---------------------|
| SKYLINE WESLEYAN CHURCH, Amend RSD Specific Plan | SPA94-001 |
| SKYLINE WESLEYAN CHURCH, Rezone to Accommodate Layout Change | R94-005 |
| SKYLINE WESLEYAN CHURCH, Major Use Permit Modification | P88-039W1 |
| SKYLINE WESLEYAN CHURCH, Tentative Map | TM-5059RPL4 |
| SKYLINE WESLEYAN CEMETERY, P95-001 Major Use Permit | PDS2011-3300-95-001 |
| T-MOBILE WEST RANCHO SAN DIEGO Site Plan, Wireless Equipment | PDS2010-3501-96-021 |
| US WEST CUYAMACA CELL FACILITY Wireless Tower and Equipment | PDS2011-3300-90-039 |

Less Than Significant With Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to project specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to GHG emissions and transportation and traffic. However, mitigation has been included that clearly reduces these cumulative effects to a level below significance. This mitigation includes purchase of carbon offset credits and payment into the TIF program. To mitigate cumulative GHG impacts, the project would purchase carbon offset credits to fully offset the project's impacts. The utilization of carbon offsets to mitigate GHG emissions is expressly authorized by CEQA Guidelines Section 15126.4(c)(3)-(c)(4), and would reduce impacts associated with the project to a less than significant level. Payment of the TIF, which will be required at issuance of building permits, will mitigate any potential cumulative traffic impacts to less than significant. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the following Sections: IV Biology; V Cultural Resources; VII Greenhouse Gas Emissions; IX

Hydrology and Water Quality; XII Noise; and XVI Transportation and Traffic. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes offsite biological open space with a resource management plan, biological monitoring during construction, cultural resource monitoring, purchase of carbon offset credits, a noise barrier, interior noise assessment, and payment into the TIF program. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

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