



THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 546769

SCH No. N/A

SUBJECT: CASA DE LAS CAMPANAS (CDLC) RESIDENTIAL ADDITION: The project requests a Planned Development Permit (PDP) and Amendment to Conditional Use Permit (CUP) No. 99-0747 to demolish an existing 99-bed one-story skilled nursing building containing 33,320 square-feet of area and to construct a 140,087 square-foot five-story (above grade) senior residential care facility with one level of underground parking and the addition of 89 parking spaces (surface and covered) with a deviation to the 40-foot maximum height limit, located on a previously developed site at 18655 West Bernardo Drive. The 22.7-acre site is located in the RM-2-5 zone within the Rancho Bernardo Community Plan Area. The site is located within Geologic Hazard Categories 53, San Dieguito Watershed, Del Dios Watershed Sub-Area, Brush Management Overlay, Very-High Fire Severity Zone, Outdoor Lighting Zone 3 - Palomar Mountain Observatory Radius, and Council District 5. (LEGAL DESCRIPTION: Lot 8, Map No. 11273, City of San Diego, County of San Diego, State of California, Recorded July 3, 1985) APPLICANT: David Johnson.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): **NOISE**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS – PART I: Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS.**"
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II: Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

**Qualified Acoustical Representative
Qualified Structural Engineer or Geotechnical Engineer**

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division - 858-627-3200**

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) #546769 and /or Environmental Document #546769, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc).

Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.
4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

NOTE: Surety and Cost Recovery - When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary,

overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:**

The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/Approvals/ Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to Preconstruction Meeting
Noise	Temporary Noise Barrier Plan	During Construction
Noise	Vibration Monitoring Plan	During Construction
Bond Release	Request for a Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

B. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Noise Requirements

1. Noise barriers shall be constructed around the perimeters of all outdoor areas exceeding 65 CNL.
 - a) The continuous noise barrier enclosing the courtyard should be constructed out of a minimum 4 lb/psf material and have a minimum height of 12'-0". The barrier should extend around the entire perimeter of the courtyard and terminate at the exterior walls of the building.
 - b) Balconies and common decks exceeding an exterior CNEL of 77 shall be enclosed with a glass wall of a minimum 5/16" thick and 8'-0" high with no gaps.
 - c) Balconies and common decks exceeding an exterior CNEL of 72 should be enclosed with a glass wall of a minimum 5/16" thick and 6'-0" high with no gaps at the base and corners
2. All exterior doors and windows shall be well fitted and sealed.
 - a) Windows shall have a fixed sash or an efficiently weather stripped, operable sash. The sash shall be rigid and weather-stripped with material that is compressed airtight when the window is closed.
 - i. Recommendations for STC rated glazing assemblies, up to STC 45 for the worst-case scenario exterior noise locations, are detailed in the marked-up drawings in Appendix II

- b) Glass shall be sealed in an airtight manner with a non-hardening sealant or a soft elastomeric gasket or gasket tape.
 - c) The perimeter of window and door frames shall be sealed airtight to the exterior wall construction with a sealant conforming to one of the following Federal specifications: TT-S- 00227, TT-S-00230 or TT-S-00153.
 - d) Fresh air should be supplied by a ducted system that maintains the acoustical performance of the exterior building envelope
3. Exterior wall assemblies shall be comprised of the following minimum construction:
- 7/8" stucco or 1-1/4" simulated stone
 - 1-1/2" cold-formed framing – vert z-girt at 16" OC
 - 3-1/2" mineral fiber insulation
 - (2) layers 5/8" moisture-resistant sheathing
 - Cold-formed metal framing
 - (2) layers 5/8" gypsum wallboard
- a) Acoustic construction details are essential to the performance of any wall assembly. At the concrete slab, it is recommended that the layer of gypsum board on the unit side be sealed on top and bottom with resilient caulk, as well as around the junction boxes.
 - b) Window rough-in seams should be no greater than 'A", and all seams should be caulked with resilient caulking.
 - c) Seal, caulk, gasket or weather-strip all joints and seams to eliminate air leakage through these assemblies. This would include around windows and doorframes, at penetrations through walls, and all other openings in the building envelope.
4. The interior noise standard is to be met in all spaces with the windows and doors closed. Ventilation is required in all spaces per the Uniform Building Code and Uniform Mechanical Code standards in order to provide a habitable environment. Wall-mounted air conditioners shall not be used.
5. All supply and return ducts to the exterior shall have the first five feet from the exterior of 20-gauge steel duct that is internally lined with one-inch thick internal acoustic lining. For compliance with health and safety requirements, kitchen exhaust ducts should not be lined. Each duct shall include a 90 degree elbow within the first five feet from the exterior such that there is no direct line of sight through the duct. Where a 90 degree elbow cannot be used, two 45 degree elbows may be used so that there is no direct line of sight through the duct. Duct openings should not be oriented towards the freeway.
6. Attic vents, if any, should not be oriented towards the freeway.
7. Range exhaust ducts connecting the interior space to the exterior shall contain a weighted backdraft damper.
8. Skylights should not be used at the project site.
9. At any penetrations of exterior walls by pipes, ducts or conduits, the space between the wall and pipes, ducts or conduits shall be caulked or filled to form an airtight seal.
10. Any other exterior vents or penetrations should not be used.

During Construction:

11. To mitigate construction noise to within SDMC limits at the existing Casa de las Campanas facility, a temporary noise barrier should be installed from the existing structures. See Figure 12-1 below for recommended extents.
 - a) The barrier should consist of a minimum 1 lb/sf mass loaded vinyl
 - b) In areas shown in red in Figure 12-1, the barrier should be suspended from the roof levels of the existing building and extend to the ground level. Drape the barrier material onto the ground to prevent sound transfer beneath the gap. Overlap the material where seams occur to prevent gaps between the barrier material.
 - c) In areas shown in blue in Figure 12-1, the barrier should be mounted on the ground level and have a vertical extent of 20'. The barrier should be continuous and have no gaps at the bottom or at any seams.
12. To the extent feasible, heavy construction equipment (bulldozers, excavators, etc.) shall not operate within 115 feet of the existing residential buildings at Casa de las Campanas facilities in order to minimize annoyance. Where this is not feasible, activities should take place during daytime work hours to minimize adverse impact on the residents in the existing facility. Additionally, residents should be relocated if impacted significantly. To avoid potential building damage due to vibration, the following measures shall be implemented when use of such equipment will take place within 15 feet of the existing buildings:
 - a) Qualified structural and geotechnical engineers shall review the peak vibration velocities estimated in this report and determine if there are any risks to the building, including possible risks from dynamic soil settlement induced by the vibration. If the structural or geotechnical engineers identify any potential risks, they shall take all necessary steps to protect the building including, but not limited to, photographing and/or videotaping the building in order to provide a record of the existing conditions before construction.
 - b) If considered appropriate by a qualified structural engineer or geotechnical engineer, long-term continuous vibration monitoring will be provided. A vibration monitoring plan will be submitted upon request.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

CITY OF SAN DIEGO

Mayor's Office

Councilmember Mark Kersey

Development Services:

Development Project Manager

Environmental Review

Engineering Review

Geology Review

Landscape Review

Planning Review

Transportation Review

Fire-Plan Review

Environmental Services Review

Plan-Facilities Financing Review

PUD-Water and Sewer Review

MMC (77A)

San Diego Central Library (81A)

Rancho Bernardo Branch Library (81AA)

City Attorney's Office (93C)

OTHER ORGANIZATIONS AND INTERESTED PARTIES

Rancho Bernardo Community Council (398)

Rancho Bernardo Community Planning Board (400)

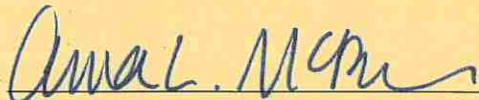
Oaks North Homeowners, Inc. (401)

The Bernardo Trails Homeowners Association (406)

VII. RESULTS OF PUBLIC REVIEW:

- (X) No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- () Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

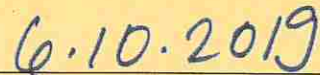
Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.



Anna L. McPherson, AICP
Program Manager
Development Services Department

5-14-2019

Date of Draft Report



Date of Final Report

Analyst: Rachael Lindquist

Attachments: Initial Study

Figure 1 – Location Map

Figure 2 – Site Plan

INITIAL STUDY CHECKLIST

1. Project title/Project number: Casa De Las Campanas (CDLC) Residential Addition / 546769
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Rachael Lindquist, Assistant Planner / (619) 446-5129
4. Project location: 18655 West Bernardo Drive, San Diego. CA. 92127 (APN 272-740-08)
5. Project Applicant/Sponsor's name and address: David Johnson. Casa De Las Campanas, 18655 West Bernardo Drive. San Diego. CA. 92127. (858) 344-7658
6. General/Community Plan designation: Residential / Medium-Density Residential
7. Zoning: Residential Multi-Family (RM-2-5)
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

The project requests a Planned Development Permit (PDP) and Amendment to Conditional Use Permit (CUP) No. 99-0747 to demolish an existing 99-bed one-story skilled nursing building containing 33,320 square-feet of area and to construct a 140,087 square-foot five-story (above grade) senior residential care facility with one level of underground parking, located on a previously developed site at 18655 West Bernardo Drive. The project proposes to construct the living facility to include 24 independent living apartments and 66 assisted living apartments for a total of 90 Units. Additionally, inclusive of the interior of project is an office suite for human resources personnel, common living areas, dining areas, and activity space on each floor, care stations, offices, and support stations for assisted living staff. Exterior elements include a central courtyard with decorated paved pathways, benches, ornamental landscaping and rock features. Prior to the demolition phase of the project, the residents of the existing one-story skilled nursing facility will be relocated to a new facility (currently under construction) at the southern end of the campus.
9. Surrounding land uses and setting:

To the North and West is the currently operating Casa De Las Campanas facility; Interstate 15 is directly to the East; To the South is the under-construction Phase II Expansion and further to the Southwest is Rancho Bernardo Community Park.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

None required

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

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego notified the Native Americans, both traditionally and culturally affiliated with the project area, of the proposed project. The tribes were notified via email and postal mail. Both Native American Tribes responded within the 30-day formal notification period requesting consultation. Consultation took place via in-person and was concluded on September 15, 2017. Please see Section XVII of the Initial Study for more detail.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Utilities/Service System |
| | | <input checked="" type="checkbox"/> Mandatory Findings Significance |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ 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.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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, 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) “Negative Declaration: 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 (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 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 (mitigated) 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 Measures 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) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) 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 significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is proposed on a previously developed site with existing buildings of similar bulk and height. The project would replace one building with another building; additionally, the project is not located in any view corridors or scenic vistas identified in the Rancho Bernardo Community Plan. The project would maintain all required setbacks and although the structure height is greater than what is allowed under the zone at forty feet, it would meet all General Development Regulations for Planned Development Permits (PDP) per Section 143.0410. Impacts would be less than significant.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

No such resources or state scenic highways are located on, near, or adjacent to the project site. No impacts would result.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would be located on an existing senior residential care facility campus with similar buildings. Although the maximum height of the proposed building would be approximately 70-feet, which would deviate from the 40-foot height limit allowed in this zone, the project would stagger with existing buildings on the campus and would have similar character with existing and proposed development such as the Casa De Las Campanas Phase II project currently under construction. The project would be constructed with an exterior finish that consists primarily of stucco and concrete roof tiles, which would match existing buildings on the site. Further, tall stands of eucalyptus trees and shrubs exist between Interstate-15 and the site that would help buffer the visual aspects of the project. Impacts would be less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would comply with the outdoor lighting standards contained in Municipal Code Section 142.0740 (Outdoor Lighting Regulations) that requires all outdoor lighting be installed, shielded, and adjusted so that the light is directed in a manner that minimizes negative impacts from light pollution, including trespass, glare, and to control light from falling onto surrounding properties. Therefore, lighting installed with the project would not adversely affect day or nighttime views in the area, resulting in a less than significant lighting impact.

The project would comply with Municipal Code Section 142.0730 (Glare Regulations) that requires exterior materials utilized for proposed structures be limited to specific reflectivity ratings. The structure would consist of mainly stucco and concrete roof tiles. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project::				
a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site does not contain any lands identified as Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as show on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency. Therefore, the project would not result in the conversion of such lands to non-agricultural use. No impacts would result.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to response II (a), above. There are no Williamson Act Contract lands on or within the vicinity of the project. The project is consistent with the existing land use and the underlying zone. The project would not conflict with any properties zoned for agricultural use or be affected by a Williamson Act Contract. No impacts would result.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur on-site. No impacts would result.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to response II (c) above. The project would not contribute to the conversion of any forested land to non-forest use, as surrounding land uses are built out. No impacts would result.

e) Involve other changes in the existing environment, which, due to their	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				

Refer to response II (a) and II (c), above. The project site is developed and does not contain any farmland or forest land. No changes to any such lands would result from project implementation. No impacts would result.

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is located in the San Diego Air Basin (SDAB) and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB). Both the State of California and the Federal government have established health-based Ambient Air Quality Standards (AAQS) for the following six criteria pollutants: carbon monoxide (CO); ozone (O3); nitrogen oxides (NOx); sulfur oxides (SOx); particulate matter up to 10 microns in diameter (PM10); and lead (Pb). O3 (smog) is formed by a photochemical reaction between NOx and reactive organic compounds (ROCs). Thus, impacts from O3 are assessed by evaluating impacts from NOx and ROCs. A new increase in pollutant emissions determines the impact on regional air quality as a result of a proposed project. The results also allow the local government to determine whether a proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with Federal and State AAQS.

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O3). The RAQS relies on information from the CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is designated residential pursuant to the City of San Diego's General Plan and the adopted Rancho Bernardo Community Plan. The project would be located in an existing retirement community and would replace an existing 99-bed health care building with a residential facility including 90 independent and assisted living units. The project would not result in an increase in traffic over the existing use. Based on City of San Diego's trip generation rates, the existing use generates 3 trips per bed for a total of 297 trips, which is similar to the 294 trips that would be generated by the project. While the project would provide additional units, it would not significantly alter the planned location, distribution, or growth of the human population in the area, as the project would serve seniors who have previously been living independently and require assisted living and health care support. The project would not result in a substantial increase in population and housing stock, as it is intended to serve residents currently living in the region. The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. Thus, the project would not obstruct or conflict with implementation of the RAQS. Impacts would be less than significant.

Additionally, the Air Quality Analysis (RECON Environmental, Inc. February 8, 2019) concluded project construction emissions would not exceed the applicable City emissions thresholds. These thresholds are designed to provide limits below which project emissions would not significantly change regional air quality. Therefore, as project emissions would be well below these limits, project construction would not result in regional emissions that would exceed the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) or contribute to existing violations. Further, construction emissions would be temporary, intermittent, and would cease at the end of project construction. Therefore, the project construction would result in a less than significant impact in regard to air quality standards. However, there are particularly sensitive receptors located on the project site. These sensitive receptors include seniors within the existing retirement community, particularly the seniors located immediately adjacent to the construction location. Although maximum construction emissions would be less than the applicable thresholds, due to the close proximity of sensitive receptors on-site, the following project design features are recommended and shall be included in the project's conditions of approval and identified on the construction plans:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize California Air Resources Board/U.S. Environmental Protection Agency Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.
- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's ACTM 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.
- Installation and maintenance of MERV-13 or better filters in all proposed units, as included in the project design, particulates entering the indoor air would be reduced, thus reducing cancer risk from diesel exhaust exposure.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Short-term (Construction)

The Air Quality Technical Report (Report) evaluated potential impacts to air quality from the construction phase of the project using the CalEEMod Model, Version 2016.3.2, which is the latest version of the California air quality model for land use projects. Project construction activities could potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. Further, the project would be required to implement the following protocols during the construction phase of the project:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize California Air Resources Board/U.S. Environmental Protection Agency Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.
- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's ACTM 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

It is anticipated that construction equipment would be used on-site for four to eight hours per day; however, construction would be short-term begin in October 2019 and last for approximately 18 months. Impacts to neighboring uses would be minimal (with implementation of project conditions) and temporary. Recon's analysis of emissions from construction, shown in Table 1, Estimated Maximum Daily Construction Emissions, demonstrates that construction emissions would be below the San Diego Air Pollution Control District Pollutant Thresholds for Stationary Sources, as shown in Table A-2 of the City of San Diego California Environmental Quality Act Significance Determination Thresholds (July 2016) for air quality. Therefore, construction would result in a less than significant impact on air quality.

Table 1 Maximum Construction Emissions (pounds per day)						
Construction	ROG	NOx	CO	SOx	PM10	PM 2.5
Demolition	1	12	10	0	4	1

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
Grading/Shoring/Basement	3	27	13	0	6	4
Undergrounding Utilities	0	3	3	0	0	0
Podium Structure	2	18	20	0	2	1
Metal Stud Structure/Roof	3	28	26	0	2	2
Exterior Skin	2	18	18	0	2	1
Architectural Coatings	17	2	2	0	0	0
Paving	1	7	8	0	1	0
Maximum Daily Emissions	17	28	26	0	6	4
Significance Threshold	137	250	550	250	100	67

Demolition, excavation, and grading can cause fugitive dust emissions. Construction of the project would be subject to standard measures required by a City of San Diego grading permit to reduce potential air quality impacts to less than significant. These measures include, but are not limited to, compliance with SDMC 142.0710, which prohibits airborne contaminants from emanating beyond the boundaries of the premises upon which the use emitting the contaminants is located. Some example measures are watering three times daily, reducing vehicle speeds to 15 miles per hour on unpaved or use architectural coatings that comply with San Diego Air Pollution Control District Rule 67.0 [i.e., architectural coatings that meet a volatile organic compounds (VOC) content of 100 grams per liter (g/l) for interior painting and 150 g/l for exterior painting] would be used during construction. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Long-term (Operational)

The Report evaluated potential impacts to air quality from the operational phase of the project using the CalEEMod Model, Version 2016.3.2, which is the latest version of the California air quality model for land use projects. The analysis of emissions from operations, shown in Table 2, Summary of Project Operational Emissions demonstrates that operational emissions would be below the San Diego Air Pollution Control District Pollutant Thresholds for Stationary Sources

Table 2 Summary of Project Operational Emissions (pounds per day)						
Source	ROG	NOx	CO	SOx	PM10	PM 2.5
Area Sources	4	0	7	0	0	0
Energy Sources	0	0	0	0	0	0
Mobile Sources	0	2	5	0	1	0
Total	4	2	12	0	0	0
Significance Threshold	137	250	550	250	100	67

Operational emissions were based on CalEEMod default assumptions, which provide a conservative means of estimating emissions. Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. After construction, air emissions from the project could result from heating, ventilation, and cooling (HVAC) systems typically associated with mixed-use development uses.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The analysis of emissions from operation, shown in Table 2, Summary of Project Operational Emissions demonstrates that project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, operations of the project would result in a less than significant impact on air quality.

Due to the project site being located within 500 feet of I-15, which carries more than 100,000 vehicles per day the Report recommended the following: *CAPCOA published a guidance document, Health Risk Assessments for Proposed Land Use Projects, that provides recommended measures that reduce concentrations of DPM (CAPCOA 2009). These include planting vegetation between the receptor and the freeway and installing newer electrostatic filters in adjacent receptor buildings. There is an existing line of trees and vegetation located between I-15 and the project site that reduces DPM concentrations. Additionally, the design for the project's ventilation system includes a pre-filtration system with MERV-8 filters and a final-filtration system with MERV-13 filters. Inclusion of these filters would be included in the project's conditions of approval. The MERV-13 filters would remove particulates entering the indoor air, thus reducing cancer risk from diesel exhaust exposure. Therefore, with the inclusion of these design elements, the potential increase in cancer risk and the non-cancer chronic risks would be less than significant.*

With implementation of the project design feature (Installation of MERV-13 Air Filters) the proposed project would be compatible with the surrounding residential development and is permitted by the community plan and zoning designation and impacts and would remain below a level of significance.

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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Short-term (Construction)

As described above in response III (a)-(b), construction operations may temporarily increase the emissions of dust and other pollutants; however, construction emissions would be temporary and short-term in duration, occurring over a period of approximately 18 months. Implementation of BMPs would reduce potential impacts related to construction activities to less than significant.

Long-term (Operational)

Operational air pollutant emissions resulting from such sources as HVAC systems, motorized equipment, and project traffic would not be generated in quantities that would result in exceedances of regulatory thresholds for criteria pollutants. Projects that propose development consistent with the growth anticipated by applicable general plans were considered in, and therefore are consistent with, the RAQS. The proposed project is consistent with the applicable land use plan (Rancho Bernardo Community Plan), and therefore, buildout of the project site has been accounted for in region-wide air quality plans. The project would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Short-term (Construction)

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Additionally, the protocols outlined above (for construction equipment) would reduce construction exhaust emissions, which would also reduce construction-related odors. Impacts would be less than significant.

Long-term (Operational)

Typical long-term operational characteristics of senior residential care facilities are not anticipated to generate odors which would affect a substantial number of people. Therefore, impacts related to odors generated from project operations would be less than significant.

IV. BIOLOGICAL RESOURCES – Would the project:

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| a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is located within the interior of an existing senior residential care campus and is surrounded by existing buildings. No habitat is located on-or immediately adjacent to the site. As such, the project would not directly or through habitat modification effect any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFW. No impacts would result.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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See response to IV (a) above. The project site does not contain any riparian habitat or other identified community, as the site is currently developed with buildings, paved parking areas and associated non-native landscaping. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
removal, filling, hydrological interruption, or other means?				

See response to IV (a) above. The site is currently developed with buildings, parking lot areas and nonnative-landscaping. It does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. No impacts would result.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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See response to IV (a) above. No wildlife corridors are on or near the project site, as the site is currently developed with buildings, parking lot areas and nonnative-landscaping. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The site is currently developed with buildings, parking lot areas and nonnative-landscaping. The project site is designated as "*Urban Developed*" pursuant to the MSCP (Multi-Species Conservation Plan and Multi-Habitat Planning Area (MHPA). There is MHPA (Subarea 115) located across West Bernardo Drive and westerly of the roadway at approximately 400 feet. There are no sensitive habitats or MHPA designated lands on or directly adjacent to the property. The project would implement Best Management Practices (BMP's) to address off-site drainage. As such, the project would not conflict with any local policies and/or ordinances protecting biological resources. No impacts would result.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See response to IV (a) above. The project site is not within the City's MHPA, and no other adopted conservation plans affect the subject site. Therefore, no impacts would result.

V. CULTURAL RESOURCES – Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

The City of San Diego criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. Projects requiring the demolition and/or modification of structures that are 45 years or older have the potential to result in potential impacts to a historical resource. The project site is currently developed, and the existing building is less than 45 years old, therefore the project was not reviewed for historic significance. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is located within a high sensitivity area on the City of San Diego's Historical Resources Sensitivity Map. Therefore, a record search of the California Historic Resources Information System (CHRIS) digital database was reviewed by qualified City Staff to determine presence or absence of potential resources within the project site and a one-mile radius. The record search did not identify archaeological sites within or adjacent to the project area. Further, the project site is completely developed with an existing senior residential campus and an associated parking lot and landscaping. As described under PTS 400695 Casa De Las Campanas: Rezone, Amendment to Conditional Use Permit No. 9867, and Planned Development Permit, "The entire project site has been disturbed by the existing Casa de las Campanas development. It is currently occupied by a parking lot. A previous Archaeological Survey prepared for the southern portion of the project site (Affinis, 1/3/96) concluded that no archeological sites or isolated artifacts have been recorded within the project area and no archaeological material was found during two independent surveys of the project site. The Affinis survey concluded that development of the parking lot at the southerly end of the project site would have no impacts to cultural resources and no further archaeology surveys or mitigation were required or recommended." Therefore, it was determined that there is no potential to impact any unique or non-unique historical resources. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

According to the Geotechnical Report (Kleinfelder September 26, 2018), the project site is underlain with Granite and Alluvium geologic formations. According to the City of San Diego CEQA Significance Determination Thresholds, these two formations have no sensitivity or a low sensitivity for the discovery of paleontological resources. Per the City's Significance Thresholds, no monitoring is required for project grading that impacts these formations. No impacts would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Disturb and human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

See response to V (a) above. It was determined that there is not potential to impact any unique or non-unique historical resources. Additionally, no formal cemeteries or human remains are known to exist on-site or in the vicinity. However, if human remains are discovered during ground-disturbing activities associated with redevelopment of the project site, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken. No impacts would result.

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.

☐ ☐ ☒ ☐

Based on the site-specific Geotechnical Investigation Report (Kleinfelder, September 26, 2018), no known active faults have been mapped at or near the project site. The project site is not located within a local fault hazard zone or State of California-designated Alquist-Priolo Earthquake Fault Studies Zone. The report noted that the nearest fault zones are approximated 15 miles east (Rose Canyon fault) and the next closest active fault is the Elsinore fault located approximately 20.2 miles to the northeast of the project site near Highway 76 in Pauma Valley. Provided this background, the geotechnical investigation report noted that the potential for ground rupture due to faulting at the site would be considered low. While the project site would be subject to seismic ground shaking from the active faults within the region, the project would not be in a fault hazard zone. Impacts would be less than significant.

- ii) Strong seismic ground shaking?

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Major seismic events on local and regional active faults described above under VI (a)(i) above could subject the site to ground shaking. While the project site, as well as most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would utilize proper engineering design and standard construction practices in accordance with the California Building Code which would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Liquefaction generally occurs when loose, unconsolidated, water-laden soils are subject to shaking, causing the soils to lose cohesion. The potential for soil liquefaction at the subject site is low due to the site being completely underlain with compacted fill and weathered granite rock noted in the geotechnical report. The project would be required to comply with the California Building Code that would reduce impacts to people or structures to an acceptable level of risk. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would remain less than significant.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The City of San Diego Seismic Safety Study (2008) classifies the site to be within a 53 Hazard Category Zone which is defined as an area of level or sloping terrain with unfavorable geologic structure with low to moderate risk. The Geotechnical Investigation Report (Report) described that through a visual evaluation, the slopes existing on-site did not indicate the presence of landslides or instability and through previous technical documents and maps, landslides would not be associated with the granitic rock or fill slopes in the project area. Impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project demolition and construction activities would have the potential to cause erosion and the downstream transport of sediment. However, these potential impacts would be addressed through conformance with applicable requirements under the California General National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges. This requirement typically involves the preparation and implementation of an approved Storm Water Pollution Prevention Plan (SWPPP), which includes erosion and sediment control BMPs. Based on the implementation of appropriate erosion and sediment control measures as part of an approved SWPPP under the NPDES Construction General Permit, potential impacts related to erosion and sedimentation hazards from the project would be less than significant.

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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As discussed in responses VI (a)(iii) and VI (a)(iv), the project would not result in significant impacts associated with liquefaction, seismically induced settlement, or landslides. As identified in the City of San Diego Seismic Study, the project site is designated as Geologic Hazards Category 53. Geologic Hazards Category 53 is defined as an area of level or sloping terrain with unfavorable geologic structure with low to moderate risk. Given the Geologic Hazard Category for the site, and the geologic conditions identified in the Report, the project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project. Further, the project

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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would adhere to proper engineering design and standard construction practices consistent with the California Building Code and impacts would remain less than significant.

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| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project's Report noted the *...majority of encountered soils within the fill and weathered rock are granular with low fines content (silt and clay), and are considered non-plastic. However, low plasticity clay was encountered between depths of 8 ½ feet and 20 feet in Boring 1. These soils are considered to have low plasticity and expansion characteristics. Based on the laboratory test results and visual descriptions of soil samples, it is our opinion that mitigation measures for expansive soils are not required.* Adherence to the geotechnical investigation recommendations for project design elements for the site, building, as well as implementation of proper engineering design and standard construction practices in accordance with the applicable California Building Code guidelines, impacts would be less than significant.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not propose any septic tank or alternative waste water disposal systems. The project site is located within the wastewater service area for the City of San Diego Metropolitan Sewerage System and Wastewater Branch of the City of San Diego Public Utilities Department. No impacts associated with soil suitability for supporting the use of septic tanks or alternative waste water disposal systems would occur. No impacts would result.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Climate Action Plan

In December 2015, the City adopted the Climate Action Plan (CAP; City of San Diego 2015). With implementation of the CAP, the City aims to reduce emissions 15 percent below the baseline to approximately 11.1 million metric tons of carbon dioxide equivalent (MMT CO₂E) by 2020, 40 percent below the baseline to approximately 7.8 MMT CO₂E by 2030, and 5 percent below the baseline to approximately 6.5 MMT CO₂E by 2035. The City has identified the following five CAP strategies to reduce greenhouse gas (GHG) emissions to achieve the 2020 and 2035 targets: (1) energy- and water-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero waste (gas and waste management); and (5) climate resiliency. The City's CAP Consistency Checklist, adopted July 12, 2016, is the primary document used by the City to ensure project-by-project consistency with the underlying assumptions in the CAP and thereby to ensure

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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that the City would achieve the emission reduction targets identified in its CAP.

CAP Consistency Checklist

The project is consistent with the City's CAP, as demonstrated in the project's CAP Consistency Checklist prepared by Kim Dominy with Casa de las Campanas, dated March 18, 2019. The CAP Consistency Checklist (Checklist) includes a three-step process to determine if a project would result in a GHG impact.

Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the Checklist, the project is consistent with the existing General Plan, Community Plan designations as well as zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP.

Completion of Step 2 of the Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as, electrical vehicle parking, short and long-term bicycle parking, and carpool/vanpool parking.

Step 3 of the Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone. The Checklist shows the project would be consistent with the requirements of the City's CAP; therefore, impacts from GHG emissions would be less than significant. Based on the project's consistency with the planned land use for the site and proposed implementation of applicable GHG reduction strategies, the project's contribution of GHGs to cumulative statewide emissions would be less than considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to response VII (a) above. The project has completed a Checklist and is consistent with the requirements of the City's CAP. As such, the project would not conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction and demolition activities would likely require the use of limited quantities of hazardous materials such as fuels for construction equipment, oils, and lubricants. The long-term operation of the site would result in the use of small quantities of hazardous materials associated with cleaning and normal building maintenance/operation. These materials would be stored, handled, used, and disposed of in accordance with applicable regulations and requirements, and would not create a significant hazard to the public or environment. Additionally, normal operations of the proposed residential care facility addition would be similar to other medical disposal activities occurring within the Casa De Las Campanas campus. Staff at the project site would be familiar with the requirements of handling, transporting, and disposing of biomedical waste from project residents. Adherence to established regulatory requirements for the small amounts of hazardous materials that would be present at the project site during construction and operation would ensure impacts associated with hazardous materials would remain less than significant.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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Refer to response VIII (a) above. Small amounts of hazardous materials would be present on the project site during demolition, construction and long-term operations of the site; however, these small quantities of materials are typical of construction and ongoing maintenance activities and would be similar to materials used at other construction sites and other buildings during long-term operation. These materials would be handled in accordance with appropriate regulatory requirements for the transport, storage, use, and disposal of such materials. Any associated accidental release would likely be easily contained due to the small quantities that would be present. Project activities would be completed in compliance with regulations, including the proper use, transport, and disposal of hazardous materials. The handling of these materials in compliance with regulations would ensure that impacts associated with reasonably foreseeable and accident conditions involving the release of hazardous materials into the environment would remain less than significant.

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

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The project is not located within a quarter mile of an existing or proposed school. No impacts would result.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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According to the California Department of Toxic Substances Control EnviroStor Database (<https://geotracker.waterboards.ca.gov/>), there are no listed hazardous materials sites for the subject property or within a 1,000-foot radius of the project site. No impacts would result.

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| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not located within any airport land use plan, the airport environs overlay zone, or the approach overlay zone. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project is not within the vicinity of private airstrips. No impacts would result.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project proposes development within an existing residential care facility development. No change to the existing circulation network would occur. Demolition and construction activities may have some closures with respect to internal driveway/parking improvements but would be temporary during construction activities. A condition of the project would be implemented that ensures the project applicant will coordinate with the City's Fire Department for submittal of a temporary access plan during demolition and construction activities to demonstrate that the project would not interfere with the implementation of or physically interfere with an adopted emergency response plan or evacuation plan. From an operational perspective, the project would not change emergency access, as no new access points or internal driveways are proposed within the redevelopment footprint of the site. Impacts would be less than significant.

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| h) 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is located within existing residential care facility development. The project site is surrounded by a Very-High Fire Severity Zone, but development would be located internal within the site and would be surrounded by existing multi-story structures and Interstate-15. City Fire-Plan staff reviewed the project and determined that there would be no issues with project implementation. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IX. HYDROLOGY AND WATER QUALITY - Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Potential impacts to existing water quality standards associated with the project would include minimal short-term construction-related erosion/sedimentation and no long-term operational storm water discharge. According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project and therefore, was required to prepare a Storm Water Quality Management Plan (SWQMP) (Pasco Laret Suiter & Associates, November 10, 2017) to identify and implement required structural Best Management Practices (BMP) for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards) as well as low impact development source control BMPs. These requirements would be implemented during construction and post-construction, which have been reviewed by qualified staff and would be re-verified during the ministerial process. Adherence with the standards would ensure that water quality standards are not violated and also preclude a cumulatively considerable contribution to water quality; therefore, a less than significant impact would result.

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| b) 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site would not require the construction of wells or the use of groundwater. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The project is located on a developed site which is currently operating where all infrastructures exist. The project would connect to the existing public water system. No impact would result.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

There are no streams or rivers within or adjacent to the project site. Limited grading is required for redevelopment of the site. Significant site alteration would not occur, as the site is already developed with an existing building, hardscaped and ornamental landscaped areas. Additionally, per the Drainage Study (Pasco Laret Suiter & Associates, November 14, 2017) the project's peak runoff is less than the existing condition peak runoff and was concluded that the project would not affect downstream facilities since the overall peak flow rate would decrease when compared to the existing condition. Therefore, the project would not 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,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

As indicated in Section IX (c), the project would not alter the existing drainage pattern of the site or significantly alter runoff volumes. Thus, the project would not significantly alter the overall drainage pattern for the site or area, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to response IX (a) through IX (d) above. The project would not exceed the capacity of the existing or planned storm water drainage system. All runoff from impervious surfaces would be treated as required by City Storm Water Regulations. To comply with current storm water regulations, on-site low impact design (LID) and integrated management practices (IMP) would be implemented to control peak runoff from the development. Qualified City staff determined that the project would not exceed the capacity of the existing storm sewer system. Adherence with the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to IX (a) above. The project is a Priority Development Project and is, therefore, required to implement structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). The project would implement LID and source control and treatment control BMPs as required by the City's Storm Water Standards. These requirements have been reviewed by qualified staff and would be re-verified during the ministerial process. Adherence to the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

According to a Federal Emergency Management Agency (FEMA) flood insurance rate map (FEMA, 2012) the project site is located within "Other Areas: Zone X, which are areas determined to be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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outside of mapped 100-and 500-year flood zones. No impact would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response to IX (h). No impacts would result.

X. LAND USE AND PLANNING – Would the project:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would be compatible with the surrounding land uses. Further, the project would be consistent with the General Plan and adopted Rancho Bernardo Community Plan. The project would include redevelopment of a portion of a previously developed site by replacing an existing skilled nursing facility with a new residential care facility. The project, therefore would not physically divide an established community. No impacts would result.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is designated Residential (residential density of 14-29 dwelling units per acre) per the adopted Rancho Bernardo Community Plan. The project is zoned RM-2-5 (Residential Multi-Family). The project is consistent with the adopted Rancho Bernardo Community Plan land use designations and the underlying zone. City staff reviewed the project and determined that it would be compatible with the urban design elements and the surrounding land uses pursuant to the Rancho Bernardo Community Plan. The demolition and construction of the project would occur within a previously developed site with similar development. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. The site is not located within or adjacent to the Multi-Habitat Planning Area (MHPA), therefore the project would not conflict with the City's Multiple Species Conservation Plan (MSCP). No impacts would result.

XI. MINERAL RESOURCES – Would the project:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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There are no known mineral resources located on the project site. The project site is not designated by the General Plan, Rancho Bernardo Community Plan, or other local, state, or federal land use plan for mineral resources recovery. The developed nature of the site and vicinity would preclude the extraction of any such resources. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to response XI (a), above. The project area has not been delineated on a local General Plan, specific plan, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. No impacts would result.

XII. NOISE – Would the project result in:

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

An Acoustical Analysis Report was prepared by A3 Acoustics (March 19, 2019) which analyzed the existing noise environment and the potential noise impacts associated with the construction and operation of the expansion at the existing Casa de las Campanas campus. Major existing noise sources at the project site include traffic noise from Interstate 15 and W Bernardo Drive. However, this would be reduced with project design features for the proposed structure. Major proposed noise sources would generate from construction activities, site traffic, parking lot activities, truck deliveries and onsite mechanical equipment.

Construction Noise

Construction activity would occur during allowable times, in compliance with Section 59.5.0404 of the San Diego Municipal Code. The San Diego Municipal Code state that construction noise in residential zones should not reach an average sound level greater than 75 dBA Leq during the 12-hour period from 7:00am to 7:00pm.

Short-term noise impacts would be associated with onsite demolition, grading, and construction activities of the project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area, but would no longer occur once construction is completed. Sensitive receptors (e.g. residential uses) occur in the immediate area and would be temporarily affected by construction noise. Results from the noise study indicates that the CNEL measured for the construction phase of the project would exceed the allowable 75 dBA and measurements taken at outdoor balconies and common areas of the exterior would exceed 65 dBA and interior locations within the proposed building where the CNEL would exceed 45 dBA, would result in a significant impact. Additionally, project construction may result in the exposure of persons to, or generation of, excessive ground-borne vibration or ground-borne noise levels

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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resulting in a significant impact. As a result, the noise study recommends mitigation measures for the construction phase of the project to reduce the impacts to a level below significance. To mitigate for construction noise, temporary noise barriers would be installed for the existing structures. Please see Section V of the Mitigation Monitoring and Reporting Program (MMRP) for more information.

Operational Noise

The project would not produce a substantial permanent increase in ambient noise levels in the project vicinity above the levels existing without the project. Traffic volumes associated with the project would not sufficiently raise the volume of traffic to create a significant impact. Operational noise would be less than significant.

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| b) Generation of, excessive ground borne vibration or ground borne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Refer to response XII (a) above. The project would implement conventional construction techniques and utilize conventional equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, and miscellaneous trucks would be used for construction. Potential effects from construction noise would be addressed through compliance with the City Municipal Code restrictions (Section 59.5.0404 of the Noise Abatement and Control Ordinance). Additionally, mitigation measures would be in place during construction activities as outlined in Section V of the MMRP which would reduce any impacts to below a level of significance.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to response XII (a). The project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. No impacts would result.

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|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Refer to response XII (a). The project would result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project. Mitigation measures outlined in Section V of the MMRP would reduce any impacts to a level below significance.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is not located within an airport land use plan or within airport noise contours. The project is located approximately 13 miles southwest of the closest airport, Marine Corps Air Station Miramar. Implementation of the project would not expose people residing or working in the area to excessive noise levels from a public airport. No impacts would result.

- 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?

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The project is not located within the vicinity of a private airstrip; therefore, people residing or working in the project area would not be exposed to excessive airport noise. No impacts would result.

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)?

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The project proposes to replace an existing residential care facility on an existing senior care campus. The site currently receives water and sewer service from the City, and no extension of infrastructure is required. As such, the project would not substantially increase housing or population growth in the area. No impacts would result.

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

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The project proposes to replace an existing 99-bed skilled nursing facility with a new 90-bed mixed assisted and non-assisted living residential care facility on an existing senior living campus. Substantial numbers of existing housing would not be displaced. No impacts would result.

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

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Refer to response XIII (b) above. No impacts would result.

XIV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provisions 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 rations, response times or other performance objectives for any of the public services:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The City of San Diego Fire-Rescue Department (SDFD) encompasses all fire, emergency medical, lifeguard, and emergency management services for the City. The closest fire station to the project site is Station 33, located at 16966 Bernardo Center Drive, San Diego, CA 92128 (approximately 2.4 miles south). The project would construct a living facility to include 24 independent living apartments and 66 assisted living apartments for a total of 90 units with associated amenities and parking. The project would not adversely affect existing levels of fire protection services to the area and would not require the construction of new or expanded governmental facilities. Impacts to fire protection would be less than significant.

ii) Police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The City of San Diego Police Department (SDPD) would serve the project. The project site is located within the SDPD's Northeastern Division, which serves a population of 234,394 people and encompasses 103.8 square miles. The Northeastern Division police station is located at 13396 Salmon River Road, San Diego, CA 92129, approximately 9 miles south of the project site. Similar to response XIV (i), the project would not result in a measurable adverse effect on police response times due to the project's infill location, the proximity of the existing police station, and the minimal increase in demand for police service that the senior residential population would generate. The project would not adversely affect existing levels of police protection services, create a significant new demand for police services, or require the construction of a new facility or expansion of an existing facility. Impacts would be less than significant.

iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not physically alter schools as it serves a senior population. Additionally, the project would not include construction of future housing or induce growth that could increase demand for schools in the area. No impacts would result.

iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is located in an urbanized and developed area where City-operated parks are available. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, the project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, no impacts would result.

v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is located in an urbanized area where City services are already provided. The project would not substantially increase the demand for libraries, electricity, gas, or other public facilities. No impacts would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?

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The project would result in the creation of new residents which would increase the demand for community parks. However, it was determined that recreation needs of residents would be satisfied with existing on-site amenities, or within the communities where local family members may live. Impacts would be less than significant.

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

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The project would not include the construction of recreational facilities nor does it require the construction or expansion of recreational facilities. No impacts would result.

XVI. TRANSPORTATION/TRAFFIC – Would the project?

- a) Conflict with an applicable plan, ordinance or policy establishing measures of 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?

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An Access Analysis for the project was prepared by Chen-Ryan (March 28, 2019), which analyzed trip generation, trip distribution/assignment, intersection level of service, and street segment level of service. It was concluded that the project would not change the existing circulation patterns on area roadways or require the redesign of streets, traffic signals, stop signs, striping, or other changes to the existing roadways or existing public transportation routes. Based on the driveway vehicle trip rate as identified in the City's Trip Generation Manual, the project is calculated to generate approximately 294 Average Daily Trips (ADT), with 15 AM and 21 PM peak hour trips. The study area roadway segments were all projected to operate at a LOS D or better with the addition of traffic from the proposed project under the "Near-Term Year 2020" and "Near-Term Year 2020 Plus Project conditions. All intersections are projected to operate at acceptable LOS C or better under all scenarios. Presently no forms of mass transit (e.g. buses, trolley) are present in the project area. A Class 2 designated bicycle path is present on West Bernardo Drive, which would remain in place with project implementation. Based on the analysis, it was determined that the project is not expected to create significant short-term or long-term increases in traffic volumes; therefore, it would not

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to response XVI (a). The project would not conflict with an applicable congestion management program and would not negatively affect level of service standards. Further, the project would not conflict with applicable plans or policies establishing measures of effectiveness for the performance of the circulation system. Impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not 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 in that the project would be consistent with land use plans and underlying zones. Implementation of the project would not result in a change in air traffic patterns, as they would not be constructed at a height that would impair air travel; nor result in either an increase in traffic levels or a change in location that results in substantial safety risks in that the project would be consistent with land use plans and underlying zones. The project would not result in a substantial safety risk. Impacts would be less than significant.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not alter existing circulation patterns on West Bernardo Drive for it would be relying on the two existing driveway access points. No design features or incompatible uses that would increase potential hazards are proposed. The project site is located on a site with existing operations. No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to response XVI (d). The project has been designed to be consistent with the City's engineering standards. No impacts would result.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
otherwise decrease the performance or safety of such facilities?				

The project site is accessed from West Bernardo Drive, which includes existing pedestrian facilities. No new bus stops or public transportation stops are included or proposed as part of the project. Additionally, the project utilizes an existing internal shuttle system for the residents. The project would not conflict with transit, bicycle, or pedestrian facilities, nor would the project decrease the safety or performance of these facilities. No impacts would result.

XVII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) 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 section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not cause a substantial adverse effect to Tribal Cultural Resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code Section 5020.1(k). No impacts would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) 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 section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditional and cultural affiliated geographic area (Public Resources Code § 21080.3.1(a)).

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision Public Resources Code Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. Although no resources occur on site, the project site is within one-mile radius of recorded archaeological sites. Therefore, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the Lipay Nation of Santa Isabel and

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the Jamul Indian Village, both traditionally and culturally affiliated with the project area via email on August 24, 2017. Both Native American Tribes responded within the 30-day formal notification period and consultation took place on September 15, 2017, with both Native American tribes who determined the project site would not contain any Tribal Cultural Resources traditionally or culturally affiliated with either tribe, and further evaluation was not necessary; consultation under Public Resources Code 21080.3.1 was therefore concluded. No impacts would result.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is located within a developed senior residential campus and is consistent with the land use and zoning designations for the site. The project is not anticipated to generate significant amounts of wastewater, increase demand for wastewater disposal or treatment, or exceed wastewater treatment requirements. On-site wastewater treatment facilities would not be required. Implementation of the project would not interrupt existing sewer service to the project site or other surrounding uses, and adequate municipal sewer services are available to serve the project. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would construct new water services which would not represent a substantial increase in water demand over existing conditions that would require new water treatment facilities as the site is already developed with a 99-bed facility and proposes the redevelopment inclusive of 90 Units. The project would have one connection to an existing private water main and one connection to an existing public water main located on-site. On-site water-use reduction and conservation measures and all public water facilities, including services and meters, must be designed and constructed in accordance with current City Water Facility Design Guidelines and City regulations. For wastewater treatment, the project would connect to an existing private sewer main. The City Public Utilities Department maintains the sewer system in this area and existing capacity was determined to be adequate to serve the project. Based on the above considerations, the project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. Existing water and sewer facilities are currently available to the existing development and would serve the project. Sewer and water capacity fees would be collected at the issuance of building permits. Thus, impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would construct on-site storm water drainage facilities and would not change the existing off-site runoff pattern. The project would not exceed the capacity of the existing storm water drainage systems and therefore, would not require construction of new or expansion of existing storm water drainage facilities. All on-site storm water drainage facilities would be consistent with the City's Drainage Design Manual and City Engineering Standards. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project does not meet the CEQA significance threshold of 500 residential units, requiring the preparation of a water supply assessment. The existing project site currently receives water service from the City, and the project would not result in a substantial increase in water demand. Adequate services are available to serve the proposed project without required new or expanded entitlements. Impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to response XVIII (a). Project operations would not adversely affect existing wastewater treatment services. Adequate services are available to serve the project site without required new or expanded facilities. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

A Waste Management Plan (WMP) was prepared for the project by BN Builders, Inc. (February 15, 2019) to identify the quantity of solid waste that would be generated during the demolition and construction phases of the project. The plan identified items to be recycled, collected and diverted, and tracked and monitored. A project condition would be provided to ensure that the protocols of the plan are implemented during the demolition and construction phases of the project. Project operations are anticipated to generate typical amounts of solid waste for a senior residential use; however, as it is a replacement of an existing facility, a significant increase in waste generation is not anticipated. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Comply with federal, state, and local statutes and regulation related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would comply with all Federal, State, and local statutes and regulations related to solid waste. The project would not result in the generation of large amounts of solid waste, nor generate or require the transport of hazardous waste materials other than minimal amounts generated during the construction phase. The project would be required to comply with all applicable City of San Diego requirements for diversion of both construction waste during the demolition phase and solid waste during the operational phase. Impacts would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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, 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

The project proposes redevelopment of a senior care facility on a previously developed site. The project site does not contain biological resources, and development of the project would not 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, 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. As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Noise. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study.

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project would be located on a developed site that is largely built out. No other construction projects are anticipated in the immediate area of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Noise, which may have cumulatively considerable impacts. As such, mitigation measures have been incorporated to reduce impacts to less than significant. Other future projects within the surrounding neighborhood or community would be required to comply with applicable local, State, and Federal regulations to reduce the potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute potentially significant cumulative environmental impacts.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project includes demolition of an existing skilled nursing facility and the construction of an assisted and non-assisted senior residential facility. As documented in this Initial Study Checklist, the project would not result in environmental effects that would cause either direct or indirect substantial adverse effects on human beings.

**INITIAL STUDY CHECKLIST
REFERENCES**

I. Aesthetics / Neighborhood Character

- ☒ City of San Diego General Plan
- ☒ Community Plans: Rancho Bernardo

II. Agricultural Resources & Forest Resources

- ☒ City of San Diego General Plan
- ☐ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
- ☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
- ☐ Site Specific Report:

III. Air Quality

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☒ Regional Air Quality Strategies (RAQS) - APCD
- ☒ Site Specific Report: *Air Quality Analysis for the Casa De Las Campanas Phase III Project*, RECON Environmental, Inc. (February 8, 2019)

IV. Biology

- ☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☒ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☐ Community Plan - Resource Element
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
- ☐ City of San Diego Land Development Code Biology Guidelines
- ☐ Site Specific Report:

V. Cultural Resources (includes Historical Resources)

- ☒ City of San Diego Historical Resources Guidelines
- ☒ City of San Diego Archaeology Library
- ☒ Historical Resources Board List
- ☐ Community Historical Survey:
- ☐ Site Specific Report:

VI. Geology/Soils

- ☒ City of San Diego Seismic Safety Study
- ☒ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Site Specific Report: *Geotechnical Investigation, Phase III Expansion Casa De Las Campanas*, Kleinfelder (September 26, 2018)

VII. Greenhouse Gas Emissions

- ☒ City of San Diego Climate Action Plan (CAP), (City of San Diego 2015)
- ☒ City of San Diego Climate Action Plan Consistency Checklist – Casa De Las Campanas Phase III Addition

VIII. Hazards and Hazardous Materials

- ☒ San Diego County Hazardous Materials Environmental Assessment Listing
- ☒ San Diego County Hazardous Materials Management Division
- ☐ FAA Determination
- ☒ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- ☐ Airport Land Use Compatibility Plan
- ☐ Site Specific Report:

IX. Hydrology/Drainage

- ☐ Flood Insurance Rate Map (FIRM)
- ☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- ☒ Site Specific Report: *Drainage Study, Casa De Las Campanas Phase III Expansion*, Pasco Laret Suiter & Associates (March 29, 2017)
- ☒ Site Specific Report: *Priority Development Project, Storm Water Quality Management Plan (SWQMP), for Casa De Las Campanas Phase III Expansion*, Pasco Laret Suiter & Associates (November 10, 2017)

X. Land Use and Planning

- ☒ City of San Diego General Plan
- ☒ Community Plan: Rancho Bernardo
- ☐ Airport Land Use Compatibility Plan
- ☒ City of San Diego Zoning Maps
- ☐ FAA Determination
- ☐ Other Plans:

XI. Mineral Resources

- ☒ City of San Diego General Plan
- ☒ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- ☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- ☐ Site Specific Report:

XII. Noise

- ☒ City of San Diego General Plan
- ☒ Community Plan: Rancho Bernardo
- ☐ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☐ Montgomery Field CNEL Maps

- X San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- X San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- X Site Specific Report: *Environmental Noise Impact Report, Casa De Las Campanas Phase III*, A3 Acoustics LLP (March 19, 2019)

XIII. Paleontological Resources

- X City of San Diego Paleontological Guidelines
- ___ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- X Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- ___ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ___ Site Specific Report:

XIV. Population / Housing

- X City of San Diego General Plan
- X Community Plan: Rancho Bernardo
- ___ Series 11/Series 12 Population Forecasts, SANDAG
- ___ Other:

XV. Public Services

- X City of San Diego General Plan
- X Community Plan: Rancho Bernardo

XVI. Recreational Resources

- X City of San Diego General Plan
- X Community Plan: Rancho Bernardo
- ___ Department of Park and Recreation
- ___ City of San Diego - San Diego Regional Bicycling Map
- ___ Additional Resources:

XVII. Transportation / Circulation

- X City of San Diego General Plan
- X Community Plan: Rancho Bernardo
- X San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- X San Diego Region Weekday Traffic Volumes, SANDAG
- X Site Specific Report: *Casa De Las Campanas – Access Analysis Study*, Chen Ryan Associates (March 28, 2019)

XVIII. Utilities

- X City of San Diego General Plan
- X Community Plan: Rancho Bernardo
- ___ Site Specific Report:

XIX. Water Conservation

____ Sunset Magazine, *New Western Garden Book*, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

 X Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html

____ Site Specific Report:

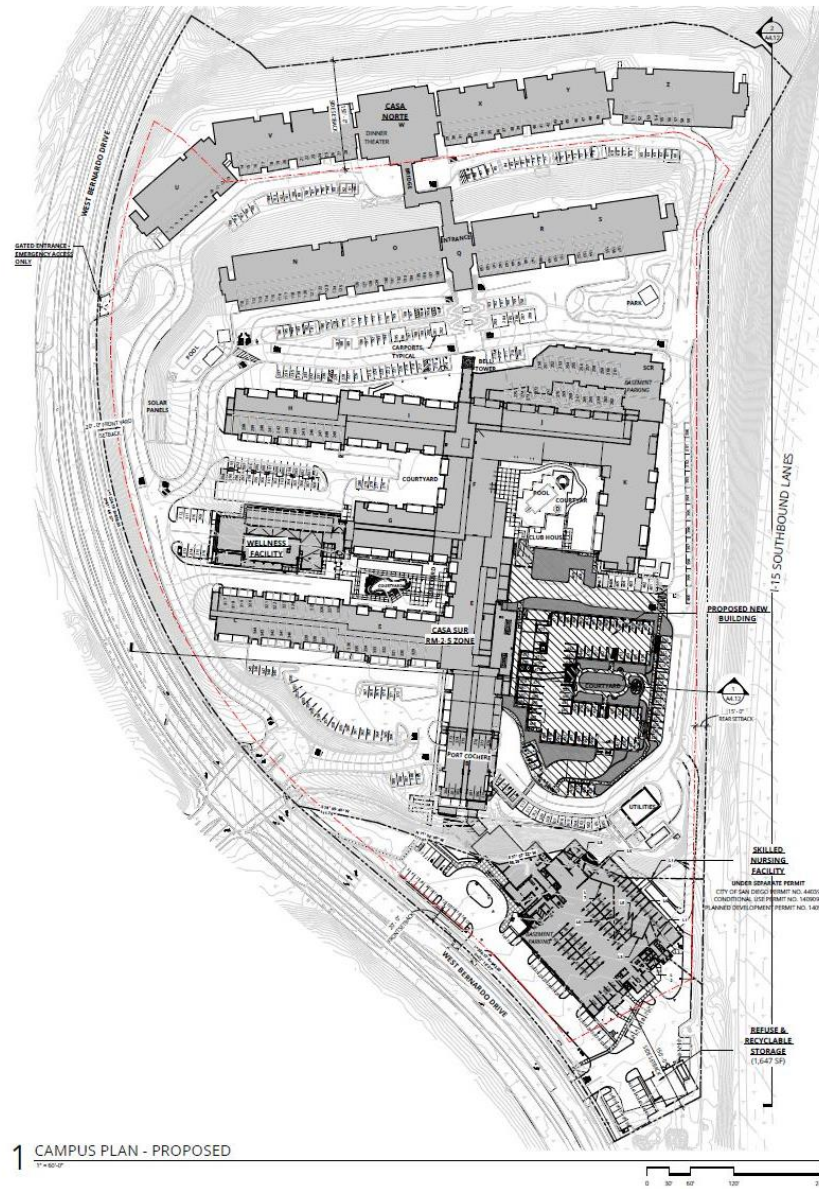


Location Map

CDLC Residential Addition- Project No. 546769
18655 West Bernardo Drive



Figure 1



Site Plan

1 CAMPUS PLAN - PROPOSED
1"=60'-0"

CDLC Residential Addition- Project No. 546769
18655 West Bernardo Drive

Figure 2