County of San Diego

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November 12, 2019

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

1. Title; Project Number:

   Ashwood Street Corridor Improvements Project (1018734)

2. Lead agency name and address:

   County of San Diego, Department of Public Works
   5510 Overland Avenue, Suite 410
   San Diego, CA 92123-1239

3. a. Contact Jeff Kashak, Land Use/Environmental Planning Manager
   b. Phone number: (858) 694-3914
   c. E-mail: Jeff.Kashak@sdcounty.ca.gov

4. Project location:

   The proposed project is located along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the Ashwood Street/Willow Road intersection within the unincorporated community of Lakeside in San Diego County (see Figures 1 and 2).

   Thomas Guide Coordinates: Page 1232, Grids B1-B3,C1

5. Project Applicant name and address:

   County of San Diego, Department of Public Works
   5510 Overland Avenue, Suite 410
   San Diego, CA 92123-1239

6. General Plan

Community Plan:	Lakeside
Land Use Designation:	Village Residential 30 (VR-30), Semi-Rural 4 (SR-4), Public/Semi-Public Facilities (P/SP), and Public Agency Lands
Density:	N/A
Floor Area Ratio (FAR)	N/A

7. Zoning

Use Regulation:	A72 – General Agriculture, A70 – Limited Agriculture, S82 – Extractive Use, S80 – Open Space, RU – Urban Residential, RR – Rural Residential, C37 – Heavy Commercial

Minimum Lot Size: Varies
Special Area Regulation: N/A

8. Description of project:

The County of San Diego (County) Department of Public Works proposes to improve an approximately 1.3-mile segment of Ashwood Street within the unincorporated community of Lakeside in San Diego County (herein after referred to as proposed project). Specifically, improvements would occur on Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road (where Ashwood Street transitions into Wildcat Canyon Road). The goals of the proposed project are to improve traffic movement and sight distance at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. The proposed project would not impact the existing bicycle lanes or equestrian crossing associated with the San Diego River Park Regional Trail. All pedestrian curb ramps installed by the County would be compliant with the Americans with Disability Act (ADA) requirements.

Specifically, Mapleview Street will be improved by reconfiguring the existing striping to include a second left-turn lane for vehicles traveling eastbound turning north onto Ashwood Street. As motorists travel north, Ashwood Street would be widened to include an additional travel lane only for vehicles entering El Capitan High School. To enhance turning movements into and out of El Capitan High School, a traffic signal system would be installed at the school's entrance; however, the primary northbound travel lane on Ashwood Street would remain unsignalized. A raised median would be installed to separate through-traffic from vehicles entering the school. To accommodate the roadway widening near El Capitan High School, a soil nail retaining wall and a soldier pile wall would be installed along the east and west sides of Ashwood Street, respectively, due to the proximity of steep slopes.

To improve pedestrian access, a sidewalk would be installed on the west side of Ashwood Street between El Capitan High School and Cactus Park. A dedicated left-turn lane would also be installed for vehicles entering Cactus Park's western property. At the intersection of Ashwood Street and Willow Road, the existing all-way stop would be improved with traffic signals, ADA-compliant pedestrian ramps and crosswalk pavement markings would be installed, and a dedicated left-turn lane would be added in each direction.

Regarding drainage improvements, the proposed project includes the relocation of existing storm drain facilities to adequately convey stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets. The proposed project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street.

Following approval of the proposed project, the County would proceed with acquiring right-of-way (ROW) necessary to construct the road improvements, including areas for slopes, drainages, or other facilities. In addition, temporary easements would be required during construction activities. No structure demolitions are proposed. For the purposes of this environmental analysis, construction is anticipated to take approximately 24 months to complete.

9. Surrounding land uses and setting:

Ashwood Street is classified as a Major Road (4.1A) according to the County General Plan - Mobility Element. The proposed project is located in a semi-rural area with the closest land uses including El Capitan High School, single and multi-family residences, Cactus County Park, and

several ranches. The San Diego River and a segment of the San Diego River Regional Trail cross Ashwood Street in the vicinity of Cactus Park. Improvements along this section of Ashwood Street near the San Diego River is limited to paving within the existing road width. At the intersection of Willow Road, Ashwood Street terminates and transitions into Wildcat Canyon Road. Wildcat Canyon Road, north of Willow Road, is classified as a Community Collector (2.1D).

Ashwood Street currently is a two-lane highway with bike lanes on each side of the road, sidewalks on the west side from Mapleview Street to El Capitan High School, and a left turn pocket for the high school entrance. The intersection of Ashwood Street/Mapleview Street is currently signalized, including left turn lanes, curb returns, and pedestrian ramps at all four corners. The intersection of Willow Road with Ashwood Street/Wildcat Canyon Road is a stop-controlled intersection with no designated turn lanes.

Drainage flows from east to west across Ashwood Street within the proposed project area. Steep slopes exist on the east side of Ashwood Street south of the river crossing and on the west side of Wildcat Canyon Road.

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

Permit Type/Action	**Agency**
General Construction Storm Water Permit	Regional Water Quality Control Board (RWQCB)

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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES ☒ NO ☐

Pursuant to State Assembly Bill 52 (AB-52), consultation was conducted with cultural affiliated tribes. The County of San Diego Department of Public Works distributed consultation letters on September 27, 2016. Two tribes requested AB-52 Consultation: the Jamul Indian Village of California and the Iipay Nation of Santa Ysabel. At a meeting on June 7, 2019 with both tribes present (either in person or via telephone), all parties agreed with the construction monitoring as proposed in this Initial Study and supporting technical reports.

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

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

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

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

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

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

Jeff Kashak — Signature

11/12/19 — Date

Jeff Kashak — Printed Name

Environmental Planning Manager — Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

I. AESTHETICS -- Except as provided in Public Resources Code Section 21099, would the project:

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

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

Discussion/Explanation:

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

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

Less Than Significant Impact: The viewshed and visible components of the landscape within the viewshed, including the underlying landform and overlaying land cover, establish the visual environment for scenic vistas. As discussed in the Visual Impact Analysis dated June 18, 2019 prepared by KTU+A, the viewshed for the proposed project site was analyzed using aerial photographs, USGS topographic maps, and computer viewshed methodologies. The viewshed overlays SR-67, which is a designated County scenic roadway. SR-67 is located approximately 0.25 mile from the southern portion of the proposed retaining walls. Buildings and trees are located between the highway and the proposed project site. These features would block most direct views of the proposed retaining walls and provide small frames of viewing opportunities to a handful of points along the proposed wall alignments. The visual analysis revealed that a small portion of Willow Road near the interchange with SR-67 would have the opportunity to view either of the proposed walls. This area is approximately 0.5-mile northwest of the proposed walls. The viewsheds do not show that the proposed traffic signal at the intersection of Ashwood Street/Wildcat Canyon Road and Willow Road would be visible for more than 0.25 mile in either direction along Willow Road. Hillsides and mountains can easily be seen from the proposed project site because of the overall size and silhouette nature of these views, but since the project site is relatively small and within a valley, the site is not visually distinct in views from these distant locations.

To improve traffic movement and sight distance along Ashwood Street, an existing natural slope extending up to 40 feet tall would be graded, and a soil nail wall would be installed. The Visual Impact Analysis prepared for the proposed project includes photo simulations of the proposed improvements. Based on the results of the visual analysis, the project has been determined to be compatible with the existing visual environment in terms of visual character and quality for the following reasons: the proposed project would introduce visual elements that are visually similar in line and form to the existing slopes, roadway, and features in the surrounding area. In addition, the proposed retaining walls and slopes would be similar in scale and visual dominance as the existing slopes. Therefore, the proposed project would result in less than significant impacts to scenic vistas.

The proposed project will not result in cumulative impacts on a scenic vista because the proposed project, along with the cumulative list of projects listed in XVIII, would not result in incompatible changes in visual character or degrade the overall visual quality of a scenic vista. Therefore, the proposed project will not result in adverse project or cumulative impacts on a scenic vista.

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

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

Discussion/Explanation:

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

Less Than Significant Impact: The proposed project is not located within one mile of a State Scenic Highway. However, Table COS-1 of the County General Plan Conservation and Open Space Element states there are three roads that are part of the County Scenic Highway System within two miles of the proposed project site: SR-67, El Monte Road, and Willow Road. However, the proposed project would not substantially change the visual environment as seen from these scenic highways.

To accommodate the roadway widening near El Capitan High School, a soil nail retaining wall and a soldier pile wall would be installed along the east and west sides of Ashwood Street, respectively, due to the proximity of steep slopes. However, as noted above these project features would not be located within a State Scenic Highway, and the retaining walls would not be visually out of scale with the existing visual environment.

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

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

Discussion/Explanation:

Less Than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the proposed project site consists of landscape character units including village residential, rural residential, institutional, park, undeveloped hillsides, industrial, and the San Diego River. Each of the key views discussed in the Visual Impact Analysis encompass moderately high and high visual quality of the parks and undeveloped hillsides. Institutional elements within the high school are also visible within most of the views. Rural residential elements are visible in many of the views. Evenly spaced trees at the top of the hill above Ashwood Street are detectable in the background of each of the views. Residential structures are also visible along the top of the slopes. These are small scale elements and not highly distinct. Ashwood Street itself is a dominant feature, and a roadway internal to the high school property is a prevalent feature. In each of these views, fences, overhead utility lines and poles, and roadway elements such as striped travel lanes and safety barriers are also visible.

The proposed project improvements such as added turn lanes, traffic signals, and standard roadway elements such as striping, guardrails, sidewalks, and ADA curb ramps would not result in highly contrasting changes to the visual environment of the project site. Each of these elements would be visually similar to existing features, albeit larger, longer or wider. Except for new traffic lights, most all roadway improvements would be relatively low or ground-plane linear elements that would not be highly visible from a distance. These elements are all considered to be typical of roadways and tend to be located in low contrast with the existing roadway environment.

The proposed project would introduce visual elements that are visually similar in line and form to the existing slopes, roadway, and features in the surrounding area. The proposed retaining walls and slopes would be similar in scale and visual dominance as the existing slopes. The most visible differences include the color, texture, and diversity within the visual environment. The visual diversity of the naturally varying rocky faces would be lessened by the introduction of new human-made, mostly flat wall faces. Without any aesthetic treatment, the concrete soil nail wall would not match the geology of the existing rock outcrop slope and would not appear natural, specifically considering the close proximity of motorists to the retaining wall. The visual unity of the surrounding area would be reduced due to the lowering of intactness. Therefore, the following project design feature would be implemented to lessen the contrast and negative aesthetics of the proposed retaining walls.

Project Design Features

The proposed retaining walls (i.e., soil nail wall and soldier pile wall) would be treated with colors, textures, and/or patterns, to the extent feasible, similar to the surrounding natural environment resembling the strata lines and colors of the local geology.

As a project design feature, the aforementioned treatment condition will be included in the design and construction of the proposed project. Because the soldier pile retaining wall is located on El Capitan High School, it should be noted that the ultimate appearance of the wall will be subject to the school district's discretion. However, the County proposes the aesthetic treatment described above. As a result, the visual quality of the existing slopes would be lessened from a moderately high visual quality and character, to a moderately low visual quality and character. The slopes would be less visually vivid due to the changes to color and texture.

Despite the changes to the visual character, vividness and intactness resulting from the proposed retaining walls and slopes, the overall quality of the visual environment of Ashwood Street would not result in a significant visual character and quality impact. The silhouette of the ridgeline east of Ashwood Street would not be changed, and the surface level elements would not be highly visible from farther distances. These elements also would be visually similar to existing roadway features when viewed up close. Therefore, the contrast and the likely viewer reaction that would result is expected to be moderately adverse, but would result in a less than significant visual impact based on the provided simulations.

The project will not result in cumulative impacts on visual character or quality because the proposed bridge project, along with the projects listed in Section XVIII, would not degrade the existing visual character or quality of the site and its surroundings, or result in incompatible changes in visual character, or degrade the overall quality of a scenic vista. Therefore, the project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves roadway improvements to Ashwood Street including enhancement of turning movements along the corridor. The project is located within Zone B as identified by the San Diego County Light Pollution Code (Sections 51.201-51.209) approximately 14 miles west of Mount Laguna Observatory. Therefore, the proposed project will not adversely affect nighttime views or astronomical observations because the project will conform to the Light Pollution Code (Sections 51.201-51.209).

The type of luminaires to be installed for the traffic signal systems would be fully-shielded with 98 watt equivalent L.E.D. The fully-shielded L.E.D. lamps are in compliance with the County of San Diego Lighting Standards and are designed to reduce any "spill-over" effects; therefore, no backlight or uplight will occur. The luminaires will emit directly in front of the fixtures and will be positioned at the appropriate angle (downward) and height to reach the intended area to be lit.

In addition, the project does not propose building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Compliance with the San Diego County Lighting Standards and the Light Pollution Code ensures that the project will not create new sources of light pollution that could contribute to skyglow, light trespass or glare and adversely affect day or nighttime views in the area.

The Light Pollution Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources of light pollution on nighttime views. The standards in the Light Pollution Code are the result of this collaborative effort and establish an acceptable level for new lighting. Therefore, compliance with the Light Pollution Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project site includes land designated as Farmland of Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). However, based on a site visit by County's Department of Public Works staff, and a review of historic aerial photography, there is no evidence of recent agricultural use on the site. Furthermore, the project will not limit future agricultural uses because the proposed project activities on the land designated as Farmland of Local Importance is within the existing public road right-of-way. Therefore, due to the lack of current and historic agricultural use at the project site, the site does not meet the definition of an agricultural resource, and no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use will occur as a result of the proposed project.

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

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

Discussion/Explanation:

No Impact: The proposed project site includes seven different zones according to the County General Plan; two of which include general agriculture and limited agriculture; however, the project site is not under a Williamson Act Contract or currently being used for agricultural use. Therefore, the proposed project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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

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

Discussion/Explanation:

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

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

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

Discussion/Explanation:

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

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

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

Discussion/Explanation:

No Impact: The proposed project site contains land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance according to the FMMP. However, based on review of historic aerial photography, there is no evidence of recent agricultural use on the proposed project site. Proposed improvements would occur to the roadway corridor; therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations will be converted to a non-agricultural use.

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

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

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

Discussion/Explanation:

No Impact: The project proposes development that was anticipated in SANDAG growth projections used in development of the RAQS and SIP. The project would construct roadway improvements and does not propose a change in land use designation or development that would result in operational emissions. As such, the project would be consistent with SANDAG's growth projections and the project would not obstruct or conflict with the implementation of the RAQS.

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

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

Discussion/Explanation:

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

The proposed project is located within the San Diego Air Basin (SDAB). Under the California Ambient Air Quality Standard (CAAQS), the SDAB is presently in non-attainment for the 1-hour and 8-hour concentrations for Ozone (O_3). SDAB is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) and 2.5 microns ($PM_{2.5}$). O_3 is formed when VOCs and nitrogen oxides (NO_x) react in the presence of sunlight.

VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street within the unincorporated community of Lakeside in San Diego County. Specifically, improvements would occur along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road (where Ashwood Street transitions into Wildcat Canyon Road). The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

No operational source of emissions are proposed as part of the project. However, air quality emissions associated with construction of the proposed project include emissions of PM_{10}, $PM_{2.5}$, NO_x, SO_x, CO, and VOCs. Grading activities associated with the construction would be subject to the San Diego County Grading, Clearing and Watercourses Ordinance, which requires the implementation of dust control measures. As discussed in the project-specific Air Quality Analysis, dated October 17, 2019, prepared by RECON Environmental Inc., emissions from construction would be minimal, localized, and temporary resulting in PM_{10} and VOC emissions below the screening-level criteria established by the LUEG guidelines for determining significance (see Table 1).

Table 1
Maximum Daily Construction Emissions
(pounds per day)

	Pollutant					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Grubbing/Land Clearing	3	35	28	<1	22	6
Grading/Excavation	5	51	36	<1	22	6
Drainage/Utilities/Sub-Grade	3	29	32	<1	42	10
Paving	3	30	35	<1	2	1
Maximum Daily Emissions	**5**	**51**	**36**	**<1**	**42**	**10**
Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	No	No	No	No	No	No

As stated above, the goal of the project is to improve existing traffic movement and sight distance at various locations along Ashwood Street. The project would not increase vehicle trips, vehicles miles travelled, or roadway capacity. Therefore, potential construction emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase in criteria pollutants. As such, the proposed project's potential impacts due to cumulatively considerable net increase of criteria pollutants would be less than significant.

As shown in Table 1, the construction-related emissions of the criteria pollutants would not exceed the County's significance level thresholds for construction and would therefore not cause a significant direct impact. These thresholds were developed based on the CAA de minimis level, which are designed to provide limits below which project emissions from an individual project would not significantly affect regional air quality or the timely attainment of the NAAQS and CAAQS. As a project design feature, the County would water the grading areas a minimum of twice daily to minimize fugitive dust. Additionally, construction would be short-term (two years), and the project would not result in long-term operational emissions. Upon review of cumulative projects in the vicinity of the County's proposed project, none were identified that would contribute to a significant air quality impact in combination with the proposed

project. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Discussion/Explanation:

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

Less Than Significant Impact: The proposed project includes roadway improvements to the existing Ashwood Street for the purpose of improving traffic movement and sight distance at various locations. Sensitive receptors near the project site include El Capitan High School west of Ashwood Street, and residential uses at the intersection of Ashwood Street and Mapleview Street, east of El Capitan High School, and in the vicinity of the intersection of Ashwood Street/Wildcat Canyon Road and Willow Road. The closest receivers include the residences northwest of the intersection of Ashwood Street/Wildcat Canyon Road and Willow Road and the residence located at 10480 Ashwood Street, all of which are approximately 45 to 55 feet from the centerline of the alignment and construction activity. However, as discussed in the Air Quality Analysis, this project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near carbon monoxide hotspots. In addition, the project will not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project as well as the listed projects have emissions below the screening-level criteria established by the LUEG guidelines for determining significance. Therefore, the potential for the proposed project to expose sensitive receptors to substantial concentrations due to temporary construction or operational impacts of the proposed project would be considered less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project includes roadway improvements to the existing Ashwood Street for the purpose of improving traffic movement and sight distance at various locations. The project does not include the construction or operation of heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some temporary nuisance odors. However, exposure to odors associated with project construction would be short term and temporary in nature. There would be no permanent or operational source of odors associated with the project. Therefore, the project will not result in in the creation of objectionable odors that may affect a substantial number of people.

IV. BIOLOGICAL RESOURCES --Would the project:

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Based on the Biological Resources Report dated October 29, 2019 prepared by RECON Environmental, Inc., it was determined that the proposed project would result in impacts to special status species as discussed below. It should be noted that the proposed project site is located within the adopted South County Multiple Species Conservation Program (MSCP) and is located on lands designated by the MSCP as "Pre-Approved Mitigation Area" and "Unincorporated Land in Metro-Lakeside-Jamul Segment".

Coastal California Gnatcatcher
The proposed project site contains suitable habitat for the federally-threatened coastal California gnatcatcher (*Polioptila californica californica*; CAGN), and this species' presence was confirmed onsite during protocol surveys conducted in spring 2019. As a result, portions of the site are considered occupied by CAGN, and the proposed project has potential to result in direct impacts to this species. The following mitigation measures are proposed to reduce impacts to a level of less than significant:

- Permanent impacts would occur to approximately 0.70 acre of the project site that is considered occupied habitat (i.e., use area) by CAGN. As the project is located within the adopted South County MSCP, and as CAGN is a covered species by the MSCP, this direct impact would be fully mitigated below a level of significance through habitat-based compensation for the permanent loss of Diegan coastal sage scrub in accordance with the Biological Mitigation Ordinance.

- To mitigate direct impacts (e.g., vegetation removal): no grubbing or clearing of vegetation shall occur of occupied Diegan coastal sage scrub during the breeding season of the coastal California gnatcatcher (March 1 – August 15). All grading plans, improvement plans, and the final map shall state the same. If clearing or grading would occur during the breeding season for the gnatcatcher, a pre-construction survey shall be conducted to determine whether gnatcatchers occur within the impact area(s). If there are no gnatcatchers nesting (includes nest building or other breeding/nesting behavior) within that area, grading and clearing shall be allowed to proceed. If, however, any gnatcatchers are observed, but no nesting or breeding behaviors are noted, additional surveys for breeding/nesting behaviors shall be conducted weekly. If any gnatcatchers are observed nesting or displaying breeding/nesting behavior during the pre-construction survey or additional weekly surveys within the area, construction within 300 feet of any location at which birds have been observed shall be postponed until all nesting (or breeding/nesting behavior) has ceased or until after August 15.

- To mitigate indirect impacts (e.g., construction noise): if operation of construction equipment occurs during the breeding season for the coastal California gnatcatcher (March 1 – August 15), pre-construction survey(s) shall be conducted by a qualified biologist as appropriate to determine whether gnatcatcher occurs within the areas potentially impacted by noise. If it is determined at the completion of pre-construction surveys that active nests belonging to this species are absent from the potential impact area, construction shall be allowed to proceed. If

pre-construction surveys determine the presence of active nests belonging to this species, then construction shall: (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA or ambient, whichever is greater. Decibel output will be confirmed by a County approved noise specialist and intermittent monitoring by a qualified biologist to ensure that conditions have not changed will be required. All grading permits, improvement plans, and the final map shall state the same.

Other Sensitive Species

The project has the potential to impact six County Group 1 wildlife species or CDFW species of special concern. Although these species were not observed, the project's location, elevation, and habitat indicate the following species have potential to occur onsite: San Diego banded gecko, California glossy snake, Cooper's hawk, white-tailed kite, southern California rufous-crowned sparrow, and yellow-breasted chat. As described in the Biological Resources Report, potential impacts to San Diego banded gecko and California glossy snake would be less than significant. Cooper's hawk and white-tailed kite are not expected to nest within the project site but may nest within 300 feet. Thus, they have potential to be indirectly impacted by construction noise if construction occurs within 300 feet of an active Cooper's hawk or white-tailed kite nest. Southern California rufous-crowned sparrow has potential to nest in Diegan coastal sage scrub within the project site, as well as in the surrounding habitat within 300 feet. Thus it has potential to be directly or indirectly impacted if vegetation clearing would occur during the general bird breeding season (February 15 to August 15). Yellow-breasted chat is not expected to nest within the project site, but may nest within 300 feet. Thus, it has potential to be indirectly impacted by construction noise if construction occurs within 300 feet of an active yellow-breasted chat nest during the general bird breeding season (January 15 to July 15).

No County List C or D plant species are expected to be impacted. However, 11 County Group 2 wildlife species have potential to be impacted by the project: Belding's orange-throated whiptail, Blainville's horned lizard, rosy boa, coast patch-nosed snake, red diamond rattlesnake, red-shouldered hawk, common barn owl, western bluebird, yellow warbler, northwestern San Diego pocket mouse, and San Diego desert woodrat. While vegetation removal and construction noise has potential to impact these species, the impacts are small, linear, and occur adjacent to an existing roadway. As a result, they are not expected to affect local long-term survival and this impact would be considered less than significant.

Direct impacts and indirect noise impacts would potentially occur to sensitive migratory birds (coastal California gnatcatcher, western bluebird, and southern California rufous-crowned sparrow) and raptors (Cooper's hawk, white-tailed kite, red-shouldered hawk, and barn owl) if vegetation clearing, grubbing, grading, or construction is conducted during the respective breeding seasons. As such, the following mitigation measures are proposed to reduce the impact to a level of less than significant:

Mitigation Measure

- To avoid impacts to upland migratory birds, grading, brush clearing, and all other construction within or adjacent to upland vegetation should be conducted outside the general migratory breeding season of February 15 to August 15 (inclusive of coastal California gnatcatcher). To avoid impacts to tree-nesting raptors, construction within or adjacent to riparian habitat should occur outside the tree-nesting raptor breeding season of January 15 to July 15. If construction must occur during these periods, the following actions would be required:

    - A qualified biologist shall conduct a pre-construction clearance survey for nesting birds within suitable habitat to determine whether coastal California gnatcatcher, other upland or migratory avian species, or raptors are nesting within 300 feet of the construction area. The pre-construction nesting bird surveys must be conducted prior to the commencement of construction activities.

- If the aforementioned birds are not observed nesting within 300 feet of construction, no grading or construction restrictions would be required.

- If nesting birds are found, nests will be noted, and no grading or clearing shall occur within 300 feet of the active nest. Monitoring will occur to ensure that no nest is removed or disturbed until the young have fledged or the nest is no longer active.

- If construction must occur within 300 feet of an active nest, temporary sound barriers may be required or construction may be restricted near the nest site to reduce noise levels below an hourly average of 60 A-weighted decibels (dB[A] L_{eq}) or ambient, whichever is greater. Any temporary sound barriers must be placed within the impact areas and not in the adjacent habitat.

Cumulative impacts from the project were evaluated with regard to past, present, and future projects within the project vicinity. While there would be some permanent loss of habitat for special status wildlife species, the impacts would be minimal and are not expected to contribute to cumulative loss of habitat for these species.

As described in the Biological Resources Report, impacts to sensitive reptiles and mammals would be considered less than significant. Habitat-based mitigation would be used to mitigate project impacts to these species by providing in-kind foraging and nesting habitat.

Therefore, any substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service will be mitigated to a level below significant.

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Based on the Biological Resources Report dated October 29, 2019 prepared by RECON Environmental, Inc., it was determined that the proposed project would result in permanent and temporary impacts to the following sensitive vegetation communities: coast live oak woodland, Diegan coastal sage scrub, and non-native grassland.

Temporary impacts to sensitive vegetation communities (South County MSCP Tiers I-III) would be mitigated at a 1:1 ratio onsite through the restoration of these areas to pre-construction conditions.

Permanent impacts to sensitive vegetation communities would be mitigated in accordance with the Biological Mitigation Ordinance (BMO) as described below and summarized in Table 2. Also, portions of the project site meet the criteria of a Biological Resource Core Area (BRCA) as identified below. All permanent impacts would be mitigated in the form of either enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area; or other off-site preservation.

Coast Live Oak Woodland (Tier I)
Permanent impacts to coast live oak woodland, including 0.01 acre BRCA and 0.02 acre non-BRCA would be mitigated at a ratio of 2:1 and 1:1, respectively. This equates to a mitigation

total of 0.04 acre (0.02 acre BRCA and 0.02 acre non-BRCA) of coast live oak woodland. Temporary impacts to 0.06 acre of coast live oak woodland would be mitigated at a 1:1 ratio onsite through the restoration of these areas to pre-construction conditions.

Diegan Coastal Sage Scrub (Tier II)
Permanent impacts to Diegan coastal sage scrub, including 0.70 acre BRCA and 0.43 acre non-BRCA would be mitigated at a ratio of 1.5:1 and 1:1, respectively. This equates to a mitigation total of 1.48 acres (1.05 acres BRCA and 0.43 acre non-BRCA) of Diegan coastal sage scrub. Temporary impacts to 5.56 acres of Diegan coastal sage scrub would be mitigated at a 1:1 ratio onsite through the restoration of these areas to pre-construction conditions.

Non-native Grassland (Tier III)
Permanent impacts to non-native grassland, including 0.10 acre BRCA would be mitigated at a ratio of 1:1. This equates to a mitigation total of 0.10 of non-native grassland. Temporary impacts to 0.22 acre of non-native grassland would be mitigated at a 1:1 ratio onsite through the restoration of these areas to pre-construction conditions.

Table 2
Mitigation for Vegetation Communities[1]

Vegetation Community	Temporary [2]		Permanent						
	BRCA	Non-BRCA	BRCA			Non-BRCA			Total Mitigation
			Impact	Ratio	Mitigation	Impact	Ratio	Mitigation	
Tier I									
Coast live oak woodland	0.03	0.03	0.01	2:1	**0.02**	0.02	1:1	**0.02**	0.04
Tier II									
Diegan coastal sage scrub	4.85	0.71	0.70	1.5:1	**1.05**	0.43	1:1	**0.43**	1.48
Tier III									
Non-native grassland	0.22	--	0.10	1:1	**0.10**	--	--	--	0.10
Tier IV									
Non-native woodland	0.08	0.37	0.06	--	--	0.06	--	--	--
Eucalyptus woodland	0.01	0.02	0.02	--	--	0.03	--	--	--
Disturbed habitat	2.60	0.94	0.35	--	--	0.73	--	--	--
Agriculture	--	0.30	--	--	--	0.12	--	--	--
Urban/developed	1.65	5.00	0.42	--	--	6.94	--	--	--
TOTAL	**9.44**	**7.37**	**1.66**		**1.17**	**8.33**		**0.45**	1.62

BRCA=Biological Resource Core Area
[1]All areas are presented in acres, rounded to nearest 0.01.
[2]Mitigation for temporary impacts would occur on site with in-kind revegetation of the impacted vegetation community.
[3]Ratios were determined based on the BMO Attachment M.

With the above avoidance, minimization, and mitigation measures, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service and impacts would be reduced to a level of less than significant.

c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

Discussion/Explanation:

No Impact: Based on the Biological Resources Report dated October 29, 2019 and prepared by RECON Environmental, Inc., the project was designed to avoid the San Diego River and impacts to jurisdictional waters and waterways. As a result, the proposed project would not impact any jurisdictional wetlands and/or riparian habitats as defined by ACOE, CDFW, or RWQCB.

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

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

Discussion/Explanation:

Less Than Significant Impact: As analyzed in the Biological Resources Report dated October 29, 2019 prepared by RECON Environmental, Inc., the San Diego River represents a regional wildlife corridor through the project area, though the project would not cause impacts within the river channel or substantially alter or impede wildlife use of the corridor. Additionally, while the project would cause temporary and permanent impacts to Diegan coastal sage scrub and other upland vegetation communities that provide breeding habitat for native birds and other wildlife, this habitat is not located within the wildlife corridor. Therefore, the project would not impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

The project area itself does not connect large blocks of habitat and project implementation will not interfere with habitat connectivity. The San Diego River, which crosses through the project area, is a larger regional wildlife corridor connecting undeveloped habitat to the east of the project site with habitat in Lakeside, Santee, and the City of San Diego. The project avoids impacts to the San Diego River and its channel. Thus, the project would not substantially interfere with habitat connectivity or interfere with a local or regional wildlife corridor or linkage.

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

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

Discussion/Explanation:

Less Than Significant Impact With Mitigation Incorporated: The proposed project site is located with the adopted South County MSCP and is located on lands designated by the MSCP as “Pre-Approved Mitigation Area” and “Unincorporated Land in Metro-Lakeside-Jamul Segment”. The project

would comply with the County's MSCP Subarea Plan, Biology Guidelines, and BMO; therefore, the project would not affect the subregional NCCP Process.

Based on the Biological Resources Report dated October 29, 2019 prepared by RECON Environmental, Inc., the proposed project could potentially conflict with the Migratory Bird Treaty Act (MBTA). Specifically, the project has the potential to impact coastal California gnatcatcher, Cooper's hawk, red-shouldered hawk, white-tailed kite, common barn owl, western bluebird, southern California rufous-crowned sparrow, yellow-breasted chat, and other birds protected by the California Fish and Game Code (CFGC) if any vegetation clearing occurs during the breeding season of January 15 to July 15 for tree-nesting raptors, March 1 to August 15 for coastal California gnatcatcher, and February 15 to August 15 for other protected birds.

As such, mitigation measures discussed above in this Initial Study, Biological Resources - Section IV (a) and (b) are proposed to reduce the impact to a level of less than significant. By incorporating these measures, the proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

V. CULTURAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: Based on an analysis of records, and a survey of the proposed project site by a County-approved historian, Harry Price on April 19, 2017, it has been determined that there are one or more historical resources within the project site. Two historic sites (CA-SDI-12870H and P-37-036611) are within the proposed project site. A cultural resources report entitled, Cultural Resources Survey and Test Excavations Report for the Ashwood Street Corridor Improvements Project, dated October 15, 2019, and prepared by RECON Environmental, Inc. evaluated the significance of these two resources. Historic resources include a historic trash scatter (CA-SDI-12870H) and a subterranean water control feature (P-37-036611).

CA-SDI-12870H was previously tested and recommended not significant under County and CEQA eligibility criteria. The area had been disked since the 1920s and was determined not significant. Historic trash scatters are not structures or buildings and therefore do not embody distinctive characteristics required for this criterion. Therefore, any impacts to this site would not cause a significant impact and mitigation is not required.

P-37-036611 was not previously tested or evaluated, and therefore is assumed significant. Because P-37-036611 is located within the proposed project site, there is potential for the project to impact this historic feature. Potential impacts to P-37-036611 can be avoided by implementing the following project design features.

Project Design Features

- An Environmentally Sensitive Area (ESA) would be designated around P-37-036611 and demarcated by temporary fencing during construction. Temporary fencing would include the following requirements:

    - Temporary ESA fencing shall be required along the APE where it intersects near the boundaries of P-37-036611.

    - The location of the fencing shall be verified by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor and the County Archaeologist. Monitors shall be present if installation of fencing requires excavation.

    - Upon approval of the fencing installation, the fencing shall remain in place until the conclusion of grading activities after which the fencing shall be removed.

    - Both archaeological and Native American monitors shall be present during ground-disturbing activities, such as temporary fence installation, grading, within 20 meters of P-37-036611.

With the incorporation of the above project design feature, the proposed project would result in less than significant impacts to historical resources. Moreover, because the significant historic resources are completely protected and potential impacts would be avoided, the project would not contribute to a potentially significant cumulative impact on historical resources.

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Based on an analysis of records and a survey of the proposed project site conducted on April 19, 2017 by County-approved archaeologists, it has been determined that there are one or more archaeological resources within the proposed project site. Specifically, five prehistoric sites (CA-SDI-4901, -8126, -22117, -22118, -22119) are located within the project site, and one prehistoric site (CA-SDI-8128) is located outside the project site but within 100 feet. A cultural resources report entitled, Cultural Resources Survey and Test Excavations Report for the Ashwood Street Corridor Improvements Project, dated October 15, 2019, and prepared by RECON Environmental, Inc. evaluated the significance of these resources. Prehistoric sites were characterized by the presence of a temporary camp site, bedrock milling features, and lithic scatter.

CA-SDI-22117 was tested and is recommended not significant under County and CEQA eligibility criteria. Therefore, any impacts to these sites would not cause a significant impact and mitigation is not required.

CA-SDI-4901 has previously been tested and recommended a significant historical resource under County and CEQA eligibility criteria. CA-SDI-8126, -8128 (outside project site), -22118, and -22119 have not been tested for significance under County and CEQA guidelines and are, therefore, assumed significant resources under County guidelines.

The proposed project could potentially impact portions of CA-SDI-4901, -8126, -22118, and -22119, and may potentially impact undiscovered significant archaeological surface deposits. These impacts can be

mitigated to a level below significant through a data recovery program for CA-SDI-4901 and avoidance for CA-SDI-8126, -8128 (outside project site), -22118, and -22119 as stated in the following measures.

Mitigation Measures

- Impacts to CA-SDI-4901 would be mitigated through implementation of a Data Recovery Program prior to construction, in addition to a Construction Monitoring Program during construction.

    - Data Recovery Program (prior to construction):

      A research design is required as part of the Data Recovery Program. The research design will guide the Data Recovery Program by proposing research questions that could be addressed by the excavations. Such questions may include chronological site placement, site function, subsistence patterns practiced at the site, and trade and exchange patterns the site may have been a part of. For the field work portion of the Data Recovery Program, a two-phased data recovery program would be implemented:

      1) Phase I would consist of excavation of 30 1x1-meter units within this area. They would be excavated to the bottom of the cultural deposit. Thirty 1x1-meter units represent approximately 1.5 percent of the total impacts. It is felt that thirty units would adequately sample the full horizontal extent of the subsurface deposit and reveal any intra-site distribution of artifact types and spatial variations in quantities of artifacts/faunal remains not revealed during the testing. All excavations would be observed by a Native American monitor.

         All units would be hand-excavated in 10-centimeter increments, until two 10-centimeter levels have been dug into sterile subsoil. Soils would be dry-screened through a one-eighth-inch mesh screen. The artifacts and ecofacts will be removed and placed in appropriately labeled bags to be cleaned, cataloged, and analyzed. Shellfish remains would be speciated and weighed, but not counted. Any human remains or potential human remains and grave goods would be treated respectfully and appropriately and repatriated to the Native American community.

         The results from Phase I would be compared to the results from the test excavation conducted by RECON as discussed in the project's Cultural Resources Survey and Test Excavations Report. A lack of intra-site variation in artifact distribution, no noticeable increase in amounts of material recovered per volume excavated, or the lack of features would mirror the initial testing results and indicate redundancy in data. Redundancy is the point at which continued excavation would produce only larger amounts of already represented data.

      2) If intra-site variability in artifact type clustering, artifact density clustering, or features are discovered, redundancy would not be achieved and a second phase of data recovery would begin. Phase II would involve excavating up to an additional 30 1x1-meter units. These units would be placed in areas where Phase I units indicated variations in vertical or horizontal artifact distribution, density variation, or feature locations. The Phase II excavation would produce additional data for a greater opportunity to resolve research questions. A total of 3 percent of the site would be excavated at the end of Phase II.

         If human remains are discovered during the data recovery excavations, existing laws and protocols will be followed before proceeding with any project action that would further disturb the remains. Provisions set forth in California PRC Section 5097.98 and state Health and Safety Code Section 7050.5 would be implemented

in consultation with the Most Likely Descendent identified by the Native American Heritage Commission (NAHC).

After completion of the field investigations, an appropriate report shall be prepared. The report should include a discussion of the materials collected and an interpretation of the data within the research context. The artifact collection, along with all field notes and a copy of the final report, shall be curated at an approved curation facility, such as the SDAC.

- Construction Monitoring Program (during construction):

  - Prior to vegetation clearing and grading, a qualified archaeologist in consultation with the County DPW and a Native American representative would verify the location of ESA fencing installed by the contractor along the APE near CA-SDI-4901. No construction activity or equipment would be allowed in the areas behind the ESA fencing.

  - The Construction Monitoring Program would require both archaeological and Native American monitors to attend a pre-construction meeting and to be present during ground-disturbing activities, such as grading or installation of ESA fencing. The frequency of inspections would be determined by the Project Archaeologist in consultation with the Native American monitor and would vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.

  - If previously unidentified potentially significant cultural resources are discovered, construction activities would be diverted away from the discovery and the resources evaluated for significance. Isolates and non-significant deposits would be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, previously unknown archaeological sites, and human remains. The Principal Investigator would inform the County Archaeologist of the discovery and together determine its significance. To mitigate potential impacts to significant cultural resources, a Data Recovery Program for any newly discovered cultural resource would be prepared by the Principal Investigator, approved by the County Archaeologist, and implemented using professional archaeological methods. Construction activities would be allowed to resume after the completion of the recovery of an adequate sample and the recordation of features.

  - All cultural material collected during the Data Recovery and Construction Monitoring Programs would be processed and curated at a San Diego County facility that meets federal standards per 36 Code of Federal Regulations Part 79 unless the tribal monitors request the collection.

  - If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) will be followed. The Principal Investigator shall contact the County Coroner.

  - After the completion of the monitoring, an appropriate report shall be prepared. If no significant cultural resources are discovered, a brief letter shall be prepared. If significant cultural resources are discovered, a report with the results of the monitoring and data recovery (including the interpretation of the data within the research context) shall be prepared.

Project Design Features

- Temporary fencing and associated monitoring will include the following requirements:
    - Temporary ESA fencing shall be required along the APE where it intersects near the boundaries of CA-SDI-8126, CA-SDI-8128, CA-SDI-22119/P-37-036612, and CA-SDI-22118/P-37-036610.
    - The location of the fencing shall be verified by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor and the County Archaeologist. Monitors shall be present if installation of fencing requires excavation.
    - Upon approval of the fencing installation, the fencing shall remain in place until the conclusion of grading activities after which the fencing shall be removed.
    - Both archaeological and Native American monitors shall be present during ground-disturbing activities, such as temporary fence installation, grading, within 20 meters of CA-SDI-8126, CA-SDI-8128, CA-SDI-22119, and CA-SDI-22118.

With the incorporation of the above mitigation and avoidance measures, the proposed project would result in less than significant impacts to archaeological resources. Moreover, because the significant archaeological resources are completely protected and/or impacts will be fully mitigated, the project will not contribute to a potentially significant cumulative impact on archaeological resources.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

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

Discussion/Explanation:

Less Than Significant Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Carmen Zepeda-Herman, on April 19, 2017, it has been determined that the project will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report entitled, Cultural Resources Survey and Test Excavations Report for the Ashwood Street Corridor Improvements Project, prepared by RECON, Environmental, Inc., dated October 15, 2019.

The monitoring program for the project would mitigate potential impacts to undiscovered significant archaeological resources. The grading monitoring program would include the following: If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) would be followed.

VI. ENERGY -- Would the project:

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

☐ Potentially Significant Impact
☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes infrastructure improvements to an existing public roadway for the purpose of improving traffic movement and sight distance at various locations. The project does not involve or introduce ongoing operational uses that would create a new source of energy consumption. During construction, temporary consumption of energy resources would occur for the purpose of equipment and materials, but the duration and area of construction are limited. Compliance with local, state, and federal regulations, which limit engine idling times and require recycling construction debris would reduce short-term energy demand during the proposed project's construction to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards and related fuel efficiencies. Furthermore, individual project elements are required to be consistent with County policies and emissions reductions strategies, and therefore, would not consume energy resources in a wasteful, inefficient, or unnecessary manner.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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

Discussion/Explanation:

Less Than Significant Impact: State and local authorities regulate energy use and consumption through various means and programs. These regulations at the state level intended to reduce energy use and greenhouse gas (GHG) emissions. These include, among others, Assembly Bill (AB) 1493 – Light-duty Vehicle Standards, California Code of Regulations Title 24, Part 11-California Green Building Standards.

On February 14, 2018, the County Board of Supervisors adopted the Climate Action Plan (CAP), which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations. The CAP updates and implements the County's 2011 General Plan Update goals, policies, and mitigation measures to meet the state's 2020 and 2030 GHG reduction targets, and demonstrate progress towards a 2050 GHG reduction goal (County 2018). The CAP contains 11 strategies, 26 GHG reduction measures, and supporting efforts organized under five GHG emissions categories: Built Environment and Transportation, Energy, Solid Waste, Water and Wastewater, and Agriculture and Conservation. Although the County's CAP is currently in litigation, the proposed project's construction methods are consistent with the County's General Plan. Additionally, the project is consistent with County plans including the Strategic Energy Plan, Renewable Energy Plan, Comprehensive Strategic Plan to Reduce Waste, and is consistent with the SDG&E Long-term Resource Plan. Accordingly, the proposed project would not conflict with or obstruct plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS -- Would the project:

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

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

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

Discussion/Explanation:

No Impact: The proposed project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

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

Discussion/Explanation:

Less Than Significant Impact: The project proposes to improve an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. No buildings or structures are proposed to be constructed as part of the project. Therefore, the project will not result would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

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

Discussion/Explanation:

Less Than Significant Impact: The project site is located within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, a Draft Geotechnical Investigation Report, dated December 21, 2017 prepared by Amec Foster Wheeler Environment & Infrastructure Inc., identifies that given the presence of dense granitic rock at 16.5 to 20 feet, and the lack of evidence of current or previous groundwater within the alluvial deposits overlying the granitic rock, the risk of liquefaction or lateral spreading is considered to be low. Furthermore, the project proposes to improve mobility and access along an existing roadway corridor with no buildings or structures being constructed as part of the project. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

iv. Landslides?

☐ Potentially Significant Impact
☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone.

Less Than Significant Impact: The project is located within an identified Landslide Susceptibility Area and contains an area of steep slopes. However, a Draft Geotechnical Investigation Report, dated December 21, 2017 prepared by Amec Foster Wheeler Environment & Infrastructure Inc., identifies there are no known landslides within or near the proposed project site, and no evidence of landslides or deep-seated slope instability were noted. The existing cut slopes adjacent to Ashwood Street generally appear to have performed relatively well since the time of their construction circa 1961. No laterally extensive adverse jointing patterns likely to be associated with deep-seated instability were identified within the exposed cut slopes or rock core borings. However, relatively well-developed joints creating a blocky structure with adverse orientations with respect to surficial stability were observed locally. Some felsic dikes and joint sets oriented parallel to cut slope faces and forming a dip-slope condition were also observed locally, as well as evidence of previous shallow pop-outs and localized ongoing surficial slaking. It appears that new cut slopes should generally be feasible to achieve the proposed roadway improvements. In addition, the proposed project includes installation of two retaining walls to provide stability and prevent movement of rock exposed on the slope face after initial grading. This would include a soil nail retaining wall on the east side of Ashwood Street across from El Capitan High School, and a soldier pile retaining wall on the west side of Ashwood Street within the high school property. Existing conditions would be improved with the proposed project and, therefore, there would be a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

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

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

Discussion/Explanation:

No Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as on-site are identified as Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded (CnG2); Fallbrook-Vista sandy loam, 15 to 30 percent slopes (FvE); Ramona sandy loam, 5 to 9 percent slopes (RaC); Tunjunga sand, 0 to 5 percent slopes (TuB), and Visalia sandy loam, 0 to 2 percent slopes (VaA) that has a soil erodibility rating of “low” to “moderate” as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project will not in substantial soil erosion or the loss of topsoil for the following reasons:

- The project will not result in unprotected erodible soils and will not alter existing drainage patterns.

- The project design includes a Water Pollution Control Plan with Best Management Practices (BMPs), such as gravel bags, fiber rolls, and hydroseeding to ensure sediment does not erode from the project site.
- Although the proposed activities including grading, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to these factors, it has been found that the proposed project would not result in substantial soil erosion or the loss of topsoil that would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death.

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

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

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

Discussion/Explanation:

No Impact: The project proposes to improve mobility and access along the existing roadway corridor and does not involve substantial grading or alteration of land. Therefore, the project will not produce unstable geological conditions. For further information regarding landslides, liquefaction, and lateral spreading, refer to VII. Geology and Soils, Question a., ii-iv listed above.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project does not contain expansive soils as defined by Table 18-I-B of the Uniform Building Code (1994). The soils on-site are identified as Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded (CnG2); Fallbrook-Vista sandy loam, 15 to 30 percent slopes (FvE); Ramona sandy loam, 5 to 9 percent slopes (RaC); Tunjunga sand, 0 to 5 percent slopes (TuB), and Visalia sandy loam, 0 to 2 percent slopes (VaA). These soils have a shrink-swell behavior of low to moderate and represent no substantial risks to life or property. Therefore, the project will not create a substantial risk to life or property.

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

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

Discussion/Explanation:

No Impact: The project proposes to improve mobility and access along the existing roadway corridor by widening the roadway, adding passing, travel and turn lanes, improving capacity at the intersections and realigning portions of the roadway to improve sight distance for motorists. The project does not propose any septic tanks or alternative wastewater disposal systems since no wastewater will be generated.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources. Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered.

The proposed project site is located on quaternary alluvium, which has a low sensitivity rating for containing paleontological resources. Since an impact to paleontological resources does not typically occur until the resource is disturbed, as a minimization measure, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance.

Project Design Feature

A monitoring program implemented by the excavation/grading contractor will be required. Equipment operators and others involved in the excavation should watch for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the County's Permit Compliance Coordinator shall be notified, and a Qualified Paleontologist shall be retained by the applicant to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has:

- A Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.);
- Demonstrated knowledge of southern California paleontology and geology; and
- Documented experience in professional paleontological procedures and techniques.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented. If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter will be submitted to

the County Department of Public Works identifying who conducted the monitoring and that no fossils were found. If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

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

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:

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

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

Discussion/Explanation:

Background of County Climate Action Plan (CAP)

On February 14, 2018, the County Board of Supervisors adopted a CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations. The CAP aims to meet the State's 2020 and 2030 GHG reduction targets (AB 32 and SB 32, respectively), and demonstrate progress towards the 2050 GHG reduction goal. Concurrent with adoption of the CAP, the County adopted new Guidelines for Determining Significance for Climate Change (County of San Diego 2018a), which identifies that a proposed project would have a less than significant cumulatively considerable contribution to global climate change if it is consistent with the County's CAP (County of San Diego 2018b). As defined in these Guidelines, consistency with the CAP is determined through the CAP Consistency Review Checklist (Checklist; County of San Diego 2018b). The Checklist follows a two-step process to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County's adopted GHG thresholds of significance. The Checklist first assesses a project's consistency with the growth projections and land use assumptions that formed the basis of CAP emissions projections. The second step of the CAP Checklist is to review and evaluate a project's consistency with the applicable measures of the CAP. If a project is consistent with the projections and land use assumptions in the CAP, its associated growth in terms of GHG emissions would have been accounted for in the CAP's projections, and project implementation of the CAP reduction measures will contribute towards reducing the County's emissions and meeting the County's reduction targets.

However, the proposed project consists of improvements to an existing County-maintained roadway, so the project site does not have a County-designated zone or land use to compare against the assumed designations used in the CAP. As noted in the County's Guidelines for Determining Significance, projects that may intensify GHG emissions over existing designations (or would result in greater GHG emissions than assessed in the CAP) are required to (1) prepare a separate, project-level GHG analysis, (2) explain how the Proposed Project is consistent with the CAP, and (3) demonstrate that the Proposed Project will not prevent the County from meeting its share of emissions reductions.

Because the CAP and the County Guidelines are based upon land use assumptions of the 2011 General Plan, this means the CAP cannot be used to streamline the review of GHG emissions resulting from the proposed roadway improvement project. Also, the proposed project would not amend the General Plan. As such, the project is not required to use the "no net increase" or "net zero" thresholds of significance prescribed by the County's Climate Change Significance Guidelines, which anticipate a "no net increase" or "net zero" threshold for projects that amend the General Plan. As such, although the CAP cannot be used to streamline the review of GHG emissions from the project, a project-specific climate change analysis was completed in compliance with the CAP to analyze potential project-related emissions and to show consistency with the CAP. Therefore, following rationale presented in the CAPCOA Guidance, the aggregate emissions from all projects with individual annual emissions that are equal to or less than 900 MT CO_2E would not impede achievement of the state GHG emissions reduction targets codified by AB 32 (2006) and SB 32 (2016), and impacts under CEQA would therefore be less than cumulatively considerable.

Lastly, it should be noted that a ruling by the Superior Court of California dated December 24, 2018 ordered the County to set aside its February 14, 2018 approval of the CAP and the Supplemental Environmental Impact Report. In January 2019, the County appealed the San Diego Superior Court ruling which stayed the above described writ. As such, the CAP and its EIR are still in place during the appeal. Given the current legal instability concerning the County's CAP, and given the above explanation of the proposed project, the analysis prepared for the proposed project did not rely on the CAP to streamline the project's environmental analysis.

In accordance with CEQA Guidelines Section 15183.5 and the County's Guidelines for Determining Significance for Climate Change, projects that can demonstrate consistency with the adopted CAP, as demonstrated through completion of the CAP Consistency Review Checklist, would have a less than significant impact to climate change. However, as noted above, the project consists of improvements to an existing County-maintained roadway, and it does not have an unincorporated County-designated zone or land use to compare against the designations used in the County's CAP. Furthermore, because the project is limited to temporary construction activities and would not affect the long-term operational characteristics of the roadway, the CAP Checklist is not applicable. The CAP projections and Checklist focus primarily on typical land use development with operational components and do not capture emissions sources such as construction. As such, the CAP cannot be used to streamline the review of GHG emissions associated with the project. The project would apply the State CEQA Guidelines, Appendix G Environmental Checklist.

Less Than Significant Impact: Development projects typically result in GHG emissions from both construction and long-term operational activities. Operational activities are consistent sources of GHG emissions that continue for the entire lifespan of a project. Comparatively, construction emissions are often intensive and vary substantially between phases of construction, but they are emitted over a finite time and end at the termination of construction activities. Thus, construction emissions are considered short-term sources of GHG emissions. The annual emissions screening level of 900 MT CO_2E was originally developed to address operational impact of GHG emissions from land use development. Since the introduction of the CAPCOA guidance, several air districts in the state have issued additional guidance that construction emissions should be included in assessment of operational GHG emissions by amortizing the total GHG construction emissions over the lifespan of a project, and then adding that amortized total to the operational emissions. This approach ensures all GHG emissions that occur from a project are included in the assessment. While similar to land use developments, different improvements or maintenance activities can vary depending on the improvement, unlike typical land use developments where an average lifespan is used, infrastructure projects should be assessed based on the specific improvement life span (e.g., 21-year lifespan on asphalt-concrete resurfacing).

Industry standard practice has been to amortize construction over the life of the project and evaluate the emissions using the 900 MT CO_2E screening level. Comparing the summation of amortized construction emissions against a threshold intended to assess operational-related impacts is

considered an appropriate approach for assessment of construction-related emissions due to the short-term nature of the emissions source.

As discussed in the project-specific Greenhouse Gas Analysis, dated October 17, 2019, prepared by RECON Environmental Inc., construction emissions from the proposed project were calculated using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Road Construction Emissions Model, Version 8.1.0. Version 8.1.0 incorporates the most currently approved Emission Factor model and Off-Road emissions factors model. The Road Construction Emissions Model calculates air quality and GHG emissions from grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, and paving activities associated with construction projects that are linear in nature (e.g., road or levee construction, pipeline installation, transmission lines).

Construction activities emit GHGs primarily through the combustion of fuels in the engines of off-road construction equipment (primarily diesel) and in the engines of on-road vehicles used for the delivery of materials and the commute vehicles of the construction workers. Every phase of the construction process, including demolition, grading, paving, and building, emits GHGs in volumes proportional to the quantity and type of construction equipment used. Accordingly, Table 3 summarizes the estimated emissions from the proposed project.

Table 3
Construction GHG Emissions
(MT CO_2E)

Phase	Duration (months)	Soil/Asphalt Hauling	Worker Commute	Water Truck	Off-road vehicles	Total GHG Emissions
Grubbing/Land Clearing	2.4	0	6	3	114	123
Grading/Excavation	10.8	505	80	15	687	1,287
Drainage/Utilities	7.2	0	38	0	366	404
Paving	3.6	0	15	0	223	238
Total	24.0	505	138	18	1,390	2,052
Annual Emissions (amortized over 21 years)						**98**

Note: Totals may vary due to independent rounding.

As shown, the project would result in a total of 2,052 MT CO_2E over the entire two-year construction period for an average of 98 MT CO_2E per year when amortized over the lifetime of the project (21 years). Annual emissions would not exceed 900 MT CO_2E per year. As discussed in above and in the project-specific Greenhouse Gas Analysis, the annual 900 MT CO_2E screening level corresponds to the most ambitious state reduction target and is highly conservative. Projects with individual annual emissions that are equal to or less than 900 MT CO2 CO_2E E would not impede achievement of the state GHG emissions reduction targets codified by AB 32 (2006) and SB 32 (2016), and impacts under CEQA would therefore be less than cumulatively considerable. As the project would not exceed the 900 MT CO_2E screening threshold for GHG emissions, GHG impacts associated with the project would be less than significant. Further, once project construction is complete, GHG emissions associated with the project would no longer be emitted.

Therefore, it is determined that the project would not generate greenhouse gas emissions, either directly or indirectly, at a level that may have a significant impact on the environment.

The project's GHG emissions are found to be a less than cumulatively considerable contribution to GHG emissions because the project would not add capacity to the roadway or generate any additional average daily trip (ADTs). Therefore, the project would result in less than cumulatively considerable impacts associated with GHG emissions and no mitigation is required.

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

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

Discussion/Explanation:

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

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

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

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street within the unincorporated community of Lakeside in San Diego County. Specifically, improvements would occur along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road (where Ashwood Street transitions into Wildcat Canyon Road). The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

As discussed in VIII (a) above, the proposed project would emit a total of 98 MT CO_2E when amortized over 21 years, which is below the 900 MT CO_2E screening threshold for GHG emissions and does not involve new land use development that would generate long-term operational impacts. Once construction activities are complete, GHG emissions would cease and the project would not be an operational source of emissions. Thus, the project would not interfere with post-2020 GHG reduction goals. Therefore, the project would not conflict with the long-term GHG policy goals of the state. As such, the project's impacts with respect to the County and state's GHG emissions goals would be less than significant.

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

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

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

Discussion/Explanation:

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street within the unincorporated community of Lakeside in San Diego County. Specifically, improvements would occur along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road (where Ashwood Street transitions into Wildcat Canyon Road). The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

A former burn site (defined as debris, refuse, ash, and ash-contaminated soil that is produced from the open burning of municipal solid waste) is located within close proximity but outside of the proposed project site. The former Lakeside Burnsite at Cactus Park ceased operation in 1959, and has remained under oversight and management by the County Department of Public Works and the Department of Environmental Health (DEH; serving as the Local Enforcement Agency (LEA)). The site is currently monitored and inspected by the LEA on a quarterly basis (SWIS 37-CR-0043). Although the former burn site is not anticipated to be effected, it is located within 250 feet of the project site, and therefore there is potential for grading or clearing activities to encounter migrated burn ash material during construction. To ensure impacts are avoided or minimized to the extent feasible, the following project design features shall be incorporated.

Project Design Feature

- Prior to construction a Community Health and Safety Plan shall be prepared and implemented to protect the public and workers from potential burn ash material encountered during project construction.

Furthermore, any disturbance of burn site materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), and the worker health and safety requirements (Title 8 CCR Section 1532.1).

Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the project will occur in compliance with local, State, and Federal regulations; the project will not 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.

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

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

Discussion/Explanation:

No Impact: Although the project is located within one-quarter mile of El Capitan High School, the project does not propose the handling, storage, or transport of hazardous materials. Therefore, the project will not have any effect on an existing or proposed school.

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

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

Discussion/Explanation:

Less Than Significant Impact: Based on a site visit and regulatory database search, the project site has not been subject to any recent release of hazardous substances. While the project site is not included in any of the following lists or databases, six sites in proximity to the project are listed on the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA’s Superfund CERCLIS database or the EPA’s National Priorities List (NPL).

The project does not propose structures for human occupancy or significant linear excavation, is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank**,** and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

County DEH maintains the SAM list of contaminated sites that have previously or are currently undergoing environmental investigations and/or remedial actions. The project site is not listed in the DEH SAM Case Listing. Five sites are located within a quarter-mile of the project; however, these cases have been completed by DEH.

The proposed project site is within 2,000 feet of five properties listed in DTSC's Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database). Four sites have a clean-up status of Complete-Case Closed, and one site is El Capitan High School listed as Inactive. therefore not considered a contaminated property, and no precautions need to be taken by the proposed project as a result of this listing.

Therefore, although sites in the vicinity of the project are listed in the DEH SAM listing and CalSites Envirstor database, the project will not create a significant hazard to the public or the environment because all site remediation and clean up has occurred and will not contribute to a cumulatively considerable impact.

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 result in a safety hazard or excessive noise for people residing or working in the project area?

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

Discussion/Explanation:

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

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

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

Discussion/Explanation:

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

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

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments.

The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

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

iii. OIL SPILL CONTINGENCY ELEMENT

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

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

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

v. DAM EVACUATION PLAN

Less Than Significant Impact: The proposed project site is located in the dam inundation zones for Chet Harritt Dam, Cuyamaca Dam, El Capitan Dam, and San Vicente Dam. The Dam Evacuation Plans for these dams will not be interfered with because although the project is located within a dam inundation zone, the project is not a unique institution that would be difficult to safely evacuate in the event of a dam failure. Unique institutions, as defined by the Office of Emergency Services, include hospitals, schools, skilled nursing facilities, retirement homes, mental health care facilities, care facilities for patients with disabilities, adult and childcare facilities, jails/detention facilities, stadiums, arenas, amphitheaters, or a similar use. Since the project does not propose a unique institution in a dam inundation zone, the project would not impair implementation of or physically interfere with the implementation of an emergency response plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project is located in an area designated as moderate, high, and very high fire severity zones and in the Lakeside Wildland Urban Interface area. However, the project involves the improvement of an existing roadway corridor. Therefore, the proposed project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code. Moreover, the project will not contribute to a

cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the County Fire Code.

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

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

Discussion/Explanation:

No Impact: The project does not propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors. There are existing agricultural uses at El Capitan High School and equestrian facilities in the project area; however, the project will not place residents closer to these existing uses. The proposed project does include installation of biofiltration basins, which are intended to convey and treat stormwater runoff and are not designed to allow water to stand for a period of 72 hours (3 days) or more. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

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

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

The proposed project requires a NPDES General Permit for discharges of storm water associated with construction activities. This permit will be obtained prior to construction to demonstrate that the project will comply with all requirements of the NPDES General Permit. Because the project includes redeveloping an existing paved roadway, the project qualifies for the preparation of a Complete Green Streets Priority Development Project (PDP) Exempt Storm Water Quality management Plan (SWQMP), which identifies site design measures and source control BMPs and treatment control BMPs that will be implemented to reduce potential pollutants to the maximum extent practicable from entering storm water runoff. Project BMPs include temporary fiber rolls on graded areas, a temporary stabilized construction entrance, silt fences will be installed where storm water flow exits the roadway and along the perimeter of the project impact area. In addition, general site management including waste management, concrete waste management, solid waste management, sanitary waste management, hazardous waste management and spill prevention and control would be implemented. These measures will enable the

project to meet waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (Order No. R9-2013-0001 as amended by Order Nos. R9-2015-0001 and R9-2015-0100), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

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

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

The project does not propose the use of groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers. These activities and operations can substantially affect rates of groundwater recharge. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project does not include altering the existing drainage pattern of the site or area, including through the alteration of a course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site. The proposed project includes improvements to an existing public roadway. A portion of the improvements would include the relocation of existing storm drain facilities as well as the installation of concrete brow ditches to adequately convey and capture stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets to reduce the volume of runoff discharged from the site. The proposed project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street.

As part of the project's design and construction, the County would implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. Therefore, the proposed project would result in less than significant impacts from erosion or siltation on- or off-site.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons:

- Drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- The project will not increase water surface elevation in a watercourse with a watershed equal to or greater one square mile by 2/10 of a foot or more in height.

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project could potentially result in an increase in the amount of impervious surfaces due to the planned roadway improvements. However, drainage will be conveyed to either natural drainage channels or approved drainage facilities. Specifically, the proposed project includes the relocation of existing storm drain facilities as well as the installation of concrete

brow ditches to adequately convey and capture stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets to reduce the volume of runoff discharged from the site. The proposed project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street. Therefore, the project is not anticipated to create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide additional sources of polluted runoff.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project is located more than a mile from the coast; therefore, in the event of a tsunami, the project site would not be inundated. The project site is not located along the shoreline of a lake or reservoir; therefore, the project site could not be inundated by a seiche. As Ashwood Street currently travels over the San Diego River, this portion of the project is located within a local and FEMA-designated flood hazard zone. However, only resurfacing of the existing roadway is proposed in this area. This reduces the risk of the release of pollutants due to project inundation in a flood hazard area. Therefore, the project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. In addition, the proposed project includes the relocation of existing storm drain facilities as well as the installation of concrete brow ditches to adequately convey and capture stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets to reduce the volume of runoff discharged from the site. The proposed project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street.

Because the project includes redeveloping an existing paved roadway, the project qualifies for the preparation of a Complete Green Streets Priority Development Project (PDP) Exempt Storm Water Quality management Plan (SWQMP), which identifies site design measures and source control BMPs and treatment control BMPs that will be implemented to reduce potential pollutants to the maximum extent practicable from entering storm water runoff. Also, the project does not propose the use of groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

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

a) Physically divide an established community?

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

Discussion/Explanation:

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

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

The proposed project is located within the unincorporated community of Lakeside, which is guided by the Lakeside Community Plan (dated August 3, 2011). The plan identifies several Resource Conservation Areas, which are lands that require special attention to conserve resources in a manner best satisfying public and private objectives. Resource Conservation Area #58 (El Cajon Mountain – El Capitan Reservoir) is located just north of the project site, and would not be impacted by the proposed project.

Regarding the construction of retaining walls, the Lakeside Design Guidelines (July 17, 1989) encourages walls to be faced with local stone or treated to mimic earth-colors and textured concrete. As discussed in this Initial Study Section I – Aesthetics (c), the proposed project includes construction of a soil nail wall that would be stained with colors similar to the existing soil and textured to mimic existing conditions.

Therefore, the project does not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Identified Mineral Resource Significance" (MRZ-2). However, the project site is surrounded by developed land uses including El Capitan High School, single and multi-family residences, Cactus County Park, and several ranches. The San Diego River and a segment of the San Diego River Regional Trail cross Ashwood Street in the vicinity of Cactus Park. These uses are incompatible to future extraction of mineral resources. Furthermore, the project is limited to improving an existing roadway corridor; therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

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

Discussion/Explanation:

Less Than Significant Impact: As discussed above in the previous response, the project site is located in an area of "Identified Mineral Resource Significance" (MRZ-2). However, the project is limited to improvement of an existing roadway corridor. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of the proposed project.

XIII. NOISE -- Would the project result in:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the

intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

As analyzed in the project-specific Noise Technical Report, dated October 17, 2019, prepared by RECON Environmental Inc., the project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

Regarding noise sensitive land uses (NSLU), no NSLU currently exist on-site and none are proposed to be developed as part of the proposed project. The project includes roadway improvements of existing public roadways and construction of retaining walls. Thus, no impacts would occur to on-site NSLU.

Regarding off-site direct noise impacts, the project would not increase traffic volumes on local roadways. However, changes in noise levels could occur due to the realignment of the roadway segment. Direct impacts were determined by comparing the existing condition to the project after completion of the improvements. As the project would not include a traffic generating land use and would not increase the capacity of roadways, the project would not result in a cumulative impact. As discussed in the Noise Technical Report, upon completion of the improvements, the project would result in a decrease of noise levels at 11 of the modeled receivers, no change in noise levels at 4 of the modeled receivers, and a noise level increase at 13 of the modeled receivers. However, the increases in noise levels at these receivers would be less than 3 dB(A), which is not a perceptible increase in noise. As the project would result in a less than 3 dB(A) increase, the predicted noise level changes would be less than significant.

Regarding operational noise (non-construction), the project does not include the construction of any structures or stationary noise sources. Thus, no violation of Section 36.409 would occur and the project would have no impact relative to local property line limits.

Regarding construction noise, the proposed project would include a variety of construction activities, including: grading and clearing, demolition of the existing roadway surface, trenching, saw cutting for culverts, placement of subgrade material, construction of retaining walls, and paving. As analyzed in the Noise Technical Report, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq}. Therefore, noise levels from construction activities would not exceed the County threshold for construction, and would be less than significant.

To ensure construction noise is reduced to the extent feasible, the following design considerations are proposed.

Project Design Features

- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

- Whenever feasible, electrical power shall be used to run air compressors and similar power tools.

- Equipment staging areas should be located as far as feasible from occupied residences.

General Plan – Noise Element
The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas. Project implementation will not expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL. Therefore, the project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404
As discussed in the project-specific Noise Technical Report, dated October 17, 2019, prepared by RECON Environmental Inc., the project does not include installation or construction of any stationary operation related equipment and would not result in a violation of the County Noise Ordinance Section 36.404.

Noise Ordinance – Section 36.409
The project will not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations will occur only during permitted hours of operation pursuant to Sectiond 36.408 and 36.409. In the event night work is required for any individual components of the Proposed Project, County staff would work with the Noise Officer pursuant to the County Noise Ordinance Section 36.423 in obtaining a Noise Variance Permit that demonstrates the Proposed Project would be completed in a manner that minimizes noise impacts to surrounding parcels in conformance to the provisions of the Noise Ordinance. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

Finally, the project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36.404 and 36.410) ensures the project will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive areas; and the project will not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the project will not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Generation of excessive groundborne vibration or groundborne noise levels?

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

Discussion/Explanation:

No Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

The goals of the proposed project are to improve existing traffic movement and sight distance at various locations along the existing roadway corridor, as well as, enhance pedestrian access. The project is not designed to increase capacity of the roadway. Therefore, the project does not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

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

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

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Influence Area or governed by an Airport Land Use Compatibility Plan (ALUCP). Gillespie Field, which is the closest airport to the project, is located approximately four miles southwest of the proposed project site. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

XIV. POPULATION AND HOUSING -- Would the project:

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

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

Discussion/Explanation:

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

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. Therefore, the proposed project will not displace any existing housing since no existing residential structures will be directly impacted by the project.

XV. PUBLIC SERVICES

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

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements along Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park.

The proposed project would not impact the existing bicycle lanes or equestrian crossing associated with the San Diego River Park Regional Trail. All pedestrian curb ramps installed by the County would be compliant with the Americans with Disability Act (ADA) requirements, including truncated domes and crosswalk pavement markings. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

XVI. RECREATION

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

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

Discussion/Explanation:

No Impact: The goals of the proposed project are to improve traffic movement and sight distance at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan

High School and Cactus Park. The Project would not impact the existing bicycle lanes or equestrian crossing associated with the San Diego River Park Regional Trail. The project does not propose any residential use, included but not limited to a residential subdivision, mobilehome park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity.

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

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

Discussion/Explanation:

No Impact: The goals of the proposed project are to improve traffic movement and sight distance at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. The project would not impact the existing bicycle lanes or equestrian crossing associated with the San Diego River Park Regional Trail. To accommodate the proposed project, it is anticipated minor portions of County-owned Cactus Park would need to be acquired to allow for the roadway's improved alignment. In accordance with the Park Preservation Act of 1971, a public agency that acquires public parkland for non-park use must either pay compensation that is sufficient to acquire substantially equivalent substitute parkland, or provide substitute parkland of comparable characteristics. Therefore, while the County would comply with the Park Preservation Act, the project does not include direct improvement of recreational facilities or require the construction or expansion of recreational facilities that would have an adverse physical effect on the environment.

XVII. TRANSPORTATION -- Would the project:

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

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

Discussion/Explanation:

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

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. The proposed project is intended to improve the existing roadway by relieving traffic congestion and enhancing motorist safety; therefore, the project would not result in increased vehicle trips, vehicles miles travelled, or roadway capacity. Also, the proposed project would

not impact the existing bicycle lanes or equestrian crossing associated with the San Diego River Park Regional Trail. Therefore, the project would not conflict with any applicable plan, ordinance or policy establishing measures of the effectiveness of the circulation system.

To address temporary traffic conditions during construction, a detailed Traffic Control Plan will be prepared and implemented. Specifically, Ashwood Street would remain open throughout construction to motorists as well as pedestrians where access currently exists. Further, all phases of construction would continue to provide two travel lanes as currently exists (one lane in each direction) with the exception of a 100-foot segment. The 100-foot segment would be temporarily restriped to one travel lane north of El Capitan High School and would be regulated by traffic signals. At this location, additional space is temporarily needed along Ashwood Street's east side to construct the north end of a soil nail retaining wall. All remaining areas of Ashwood Street, Wildcat Canyon Road, and Mapleview Street would continue to provide the same number of travel lanes during construction as currently exists. It should be noted that various portions of the roads may be intermittently reduced to one lane with flaggers during daytime activity, but all lanes would be reopened after daytime work concludes. This temporary traffic control strategy is the minimum necessary to build the safety improvements while and avoid inconveniencing the community. Lastly, various driveways would be reconstructed to match the improved roadway, and coordination will occur with all surrounding properties whose access may be affected.

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

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

Discussion/Explanation:

No Impact: The proposed project involves transportation-related (i.e., existing public roadway) improvements. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. The proposed project is intended to improve the existing roadway by relieving traffic congestion and enhancing motorist safety. As the proposed project would not result in increased vehicles miles travelled, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b).

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

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

Discussion/Explanation:

No Impact: The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. Accordingly, the project would improve the existing roadway's geometric design and would not increase hazards, alter traffic patterns, place incompatible uses (e.g., farm equipment), or create or place curves, slopes, or walls which impedes adequate site distance on a road.

d) Result in inadequate emergency access?

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations. As discussed above, access along the Ashwood Street corridor would be provided at all times during temporary construction. The proposed project would not result in inadequate emergency access and will serve to improve the existing roadway corridor.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

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

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

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

Discussion/Explanation:

No Impact: Pursuant to AB-52, consultation was initiated with culturally-affiliated Native American tribes. County DPW submitted consultation letters on October 20, 2015, September 27, 2016, and June 14, 2017 to 13 tribes, including Barona Group of the Capitan Grande, Campo Band of Mission Indians, Ewiiaapaayp Band of Kumeyaay Indians, Iipay Nation of Santa Ysabel, Inaja Band of Mission Indians, Jamul Indian Village, Kwaaymii Laguna Band of Mission Indians, La Posta Band of Mission Indians, Manzanita Band of Kumeyaay Nation, Mesa Grande Band of Mission Indians, San Pasqual Band of Mission Indians, Sycuan Band of Kumeyaay Nation, and Viejas Band of Kumeyaay Indians.

The Jamul Indian Village requested to consult under AB-52 in conjunction with the Iipay Nation of Santa Ysabel. On June 7, 2019 with both tribes present (either in person or via telephone), all parties agreed with the construction monitoring as proposed in this Initial Study and associated Cultural Resources Survey and Test Excavations Report, dated October 15, 2019, prepared by RECON Environmental, Inc.

No tribal cultural resources were identified during consultation. As such, the proposed project would result in no impacts to tribal cultural resources. The project site lies within an area previously disturbed by the construction of the road corridor and surrounding development, however, per the requests made during Native American consultation, the County agreed to provide a Native American monitor and on-call archaeologist during project-related ground disturbing activities. If significant cultural resources are

discovered, construction activities would be diverted away from the discovery and the resources would be evaluated for significance.

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

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

Discussion/Explanation:

No Impact: No tribal cultural resources, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe were identified. Therefore, there is no impact to a tribal cultural resource associated with the project.

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. In addition, the proposed project includes the relocation of existing storm drain facilities as well as the installation of concrete brow ditches to adequately convey and capture stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets to reduce the volume of runoff discharged from the site. The Project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street.

While the proposed project would include relocation of existing utilities, the project does not involve construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities. The project does include minor modification to the existing stormwater drainage system as detailed above. However, as outlined in this Initial Study, the expanded facilities will not result in adverse physical effect on the environment. Specifically, refer to Sections IV, V and X for more information. Therefore there would be no significant environmental effects caused by the construction or relocation of these types of facilities associated with the project.

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project does not involve or require services from a water provider. Therefore, the project will not affect existing or future water supplies.

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

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

Discussion/Explanation:

No Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The project will not generate wastewater and therefore will not require a determination by a wastewater treatment provider regarding capacity.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road.

As part of the roadway improvements, the project may generate a negligible amount of solid waste or export material. All solid waste facilities, including landfills require solid waste facility permits to operate.

In San Diego County, the County DEH LEA issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). If the export of solid waste or other materials is needed, the project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, the project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The goals of the project are to improve traffic movement and sight distance at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road.

As part of the roadway improvements, the project may generate a negligible amount of solid waste or export material. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). If the export of solid waste or other materials is needed, the project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, the project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

XX. WILDFIRE -- If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

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

Discussion/Explanation:

No Impact: The project is limited to improving traffic movement and sight distance along Ashwood Street at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The project will not interfere with an adopted emergency response plan or emergency evacuation plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not result an impact to emergency plans.

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

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

Discussion/Explanation:

No Impact: The project is limited to improving traffic movement and sight distance along Ashwood Street at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. Occupants of Ashwood Street include motorists and pedestrians, and the proposed project would not result in an increased use of Ashwood Street. Therefore, the proposed project would not add or increase occupants, or exacerbate wildfire risks thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

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

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

Discussion/Explanation:

No Impact: The proposed project is limited to improving traffic movement and sight distance along an existing public roadway. To accommodate the proposed improvements, existing utility poles may need to be relocated outside of the roadway's alignment. As such, the project would not require the installation or result in the need for increased maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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

Discussion/Explanation:

No Impact: The proposed project is limited to improving traffic movement and sight distance along Ashwood Street at various locations including El Capitan High School, Cactus County Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. As part of the engineering design of the project, various slopes would be graded to accommodate the road's adjusted alignment; two of which would include retaining walls due to the presence of steep slopes. In addition, the proposed project includes the relocation of existing storm drain facilities as well as the installation of concrete brow ditches to adequately convey and capture stormwater runoff along Ashwood Street. Stormwater runoff would either be conveyed to proposed biofiltration basins for treatment or directed to curb inlets to reduce the volume of runoff discharged from the site. The proposed project would not alter or modify the existing culvert system that conveys flows from the San Diego River underneath Ashwood Street. Therefore, the project would not expose people or structures to significant risks, including downslope

or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV, V and X of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biological resources and cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes the following: pre-project nest surveys for impact avoidance; and temporary fencing in culturally sensitive areas with monitoring by an Archaeologist and Native American monitor. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

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

PROJECT NAME	PERMIT/MAP NUMBER
El Capitan Townhome Apartments	PDS2015-LP-15-012
Seven Church	PDS2015-MUP-73-050W1M3
Lakeside Christian Church	PDS2015-MUP-70-346M2
Elite Vision Senor Care Facility	PDS2015-MPA-15-016
Laurel Street Apartments	PDS2014-STP-14-002

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XX of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

Less Than Significant Impact: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, XVII. Transportation and Traffic and XX. Wildfire. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

PROJECT-SPECIFIC REFERENCES

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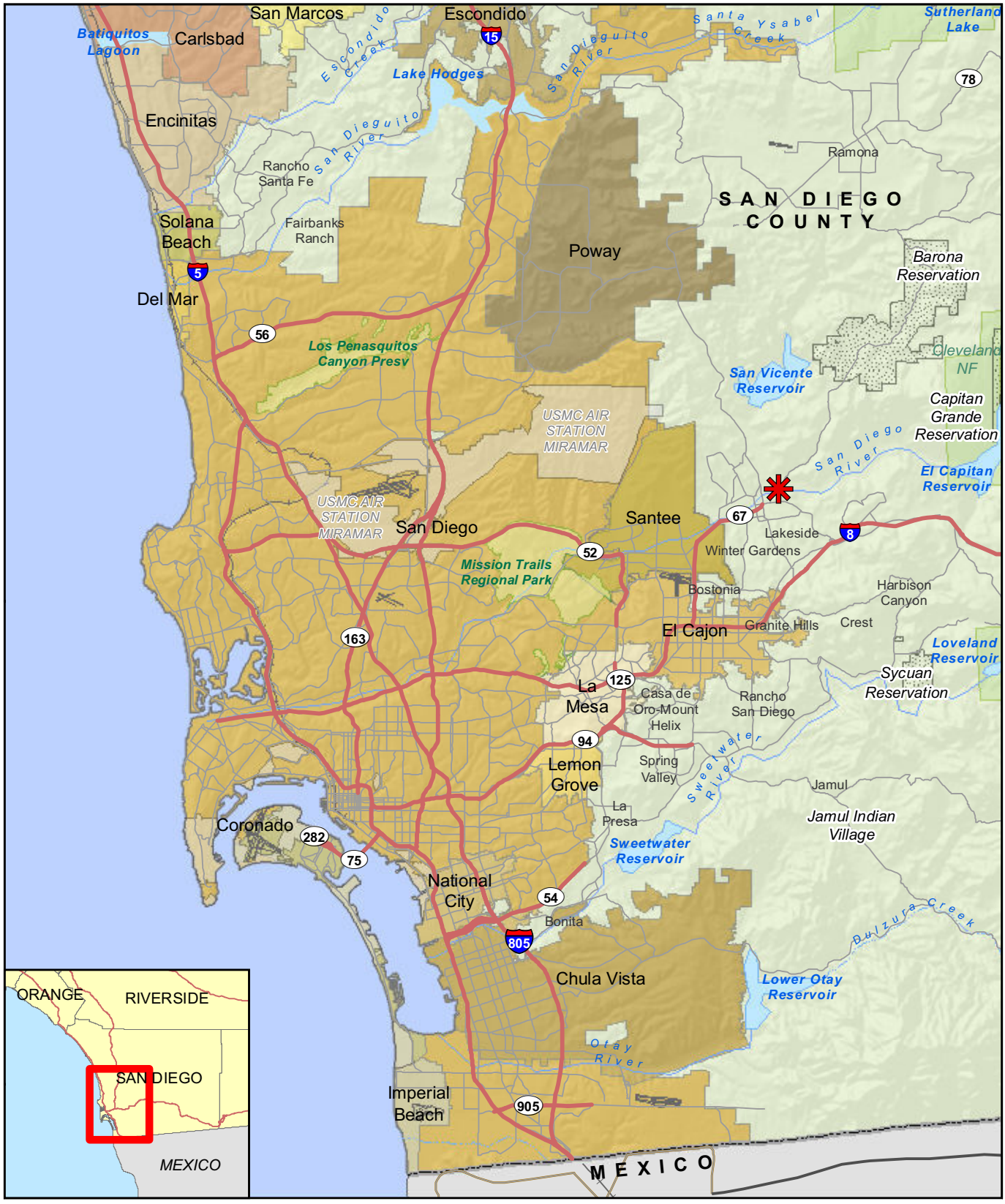

Project Location

FIGURE 1
Regional Map
Ashwood Street Corridor Improvements Project

Image Source: NearMap (flown September 2019)

Project Site

FIGURE 2
Project Vicinity Map
Ashwood Street Corridor Improvements Project