Mitigated Negative Declaration

Project Name	Encompass Health
Project Location	517 Shinohara Lane Chula Vista, California 91911
Assessor's Parcel No.:	644-040-01-00
Project Applicant:	Encompass Health California Real Estate, LLC. 9001 Liberty Parkway Birmingham, Alabama 35242 Contact: John Tschudin 205.970.5677
Case No.:	IS19-0003
Date of Draft Document:	February 24, 2021
Date of Final Document:	TBP

A. PROJECT SETTING

The proposed Encompass Health Chula Vista project (proposed project) is located at 517 Shinohara Lane, east of Interstate 805 (I-805), west of Brandywine Avenue, and north of Main Street. The site is on the U.S. Geological Survey 7.5-minute Imperial Beach Quadrangle in Section 19 in Township 18 South and Range 2 West (Figure 1, Project Location). The project site consists of the Assessor's Parcel Number (APN), which is 644-040-01-00 and is a total of 9.79-acres (Figure 2, Aerial Image). Due to its abnormal configuration, it is further noted that the parcel for this site includes two disjointed areas; the main area where the proposed structures are located and a narrow long strip that is located to the south of Shinohara Lane and extends to Main Street.

The site is within an urbanized portion of the City of Chula Vista (City). The site is surrounded by residential to the north and west, and industrial uses to the east and south. The surrounding residential includes the Mendocino multi-family development to the north and the Princess Manor single-family subdivision to the west. To the east and south are industrial uses such as Jabil manufacturing, Penske Collision Center, Lyon Technologies, Surgical Specialties, Curbell Plastics, and Technico Corporation.

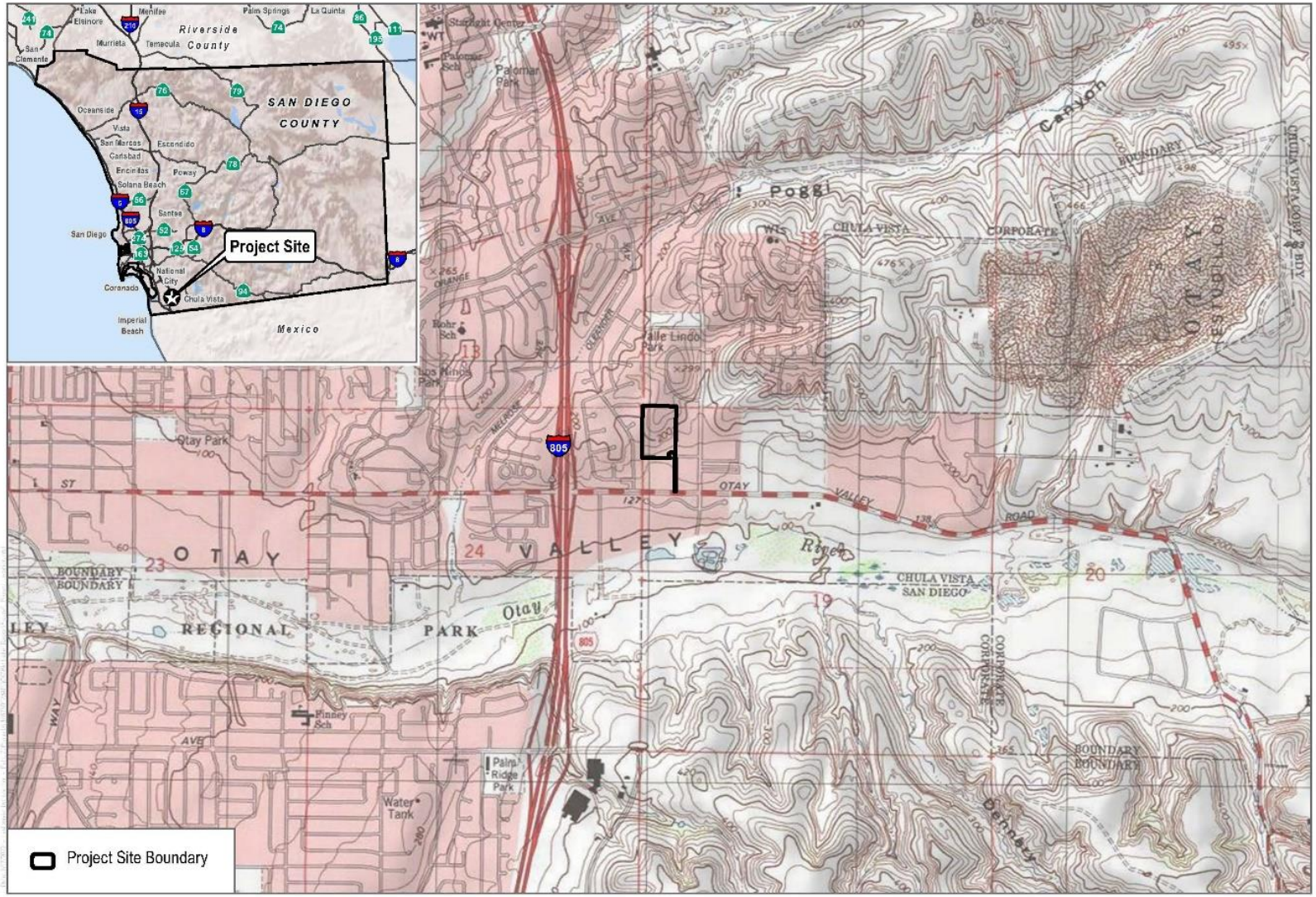
The project site has been previously disturbed and graded. The site is vacant with steep terrain sloping north downward to the south. Elevations range from approximately 143 above mean sea level (amsl) in the southeastern portion of the site, and up to approximately 257 feet amsl in the north portion of the site. There are existing concrete v-gutter drainage channels within the project site, as well as bordering the site to the east and south. An unlined drainage channel also exists directly west of the site. Surface flows under existing conditions drain toward the southern end of the site.

The City of Chula Vista General Plan, Land Use Element designates the proposed project site as Limited Industrial (IL), which is intended for light manufacturing; warehousing; certain public utilities; auto repair; auto salvage yards; and flexible-use projects that combine these uses with associated office space (City of Chula Vista 2017).

The project site is zoned Limited Industrial – Precise Plan Modifying District (ILP). The proposed inpatient rehabilitation center is an Unclassified Use pursuant to Section 19.54.020(h) of the Chula Vista Municipal Code (CVMC). As such, the proposed use would be permitted in this zone subject to approval of a Conditional Use Permit approved by the Planning Commission. The project includes a waiver from CVMC Section 19.58.360, which requires a site wall to screen the development from neighbors. This waiver is requested because the topography, proximity of uses, existing fencing, and landscaping would provide sufficient visual screening and protection between the property and the neighbors. The project site is surrounded by residential and industrial land use designations.

B. PROJECT DESCRIPTION

The project proposes up to an 80-bed inpatient rehabilitation facility with supporting amenities on the 9.79-acre site (Figures 3a and 3b, Site Plan). The project would be developed in two phases with phase 1 consisting of up to 50 beds and phase 2 providing an additional 30 beds. Figure 3a shows the phase 1 site plan. Figure 3b shows the phase 2 site plan. The proposed inpatient rehabilitation center uses would be to provide recovery from medical issues such as amputation, multiple trauma, arthritis, neurological disorders, brain injuries, burns, stroke, or spinal cord injury. As such, the center would include specialized rehabilitation and evaluation rooms in addition to patient rooms. Patients are assumed to be transported to the facility via a non-emergency ambulance and stay at the center until their release. Considering the type of care to be provided and based on similar facilities operated by the applicant, the 80-bed facility is expected to have approximately 210 daily employees.



SOURCE: USGS 7.5-Minute Series Imperial Beach Quadrangle(s)
Township 18S/Range 1W/Sections 18-19

DUDEK 0 1,000 2,000 Feet

FIGURE 1

Project Location

Encompass Health Chula Vista

INTENTIONALLY LEFT BLANK

SOURCE: SANDAG Aerial Imagery Basemap, 2014

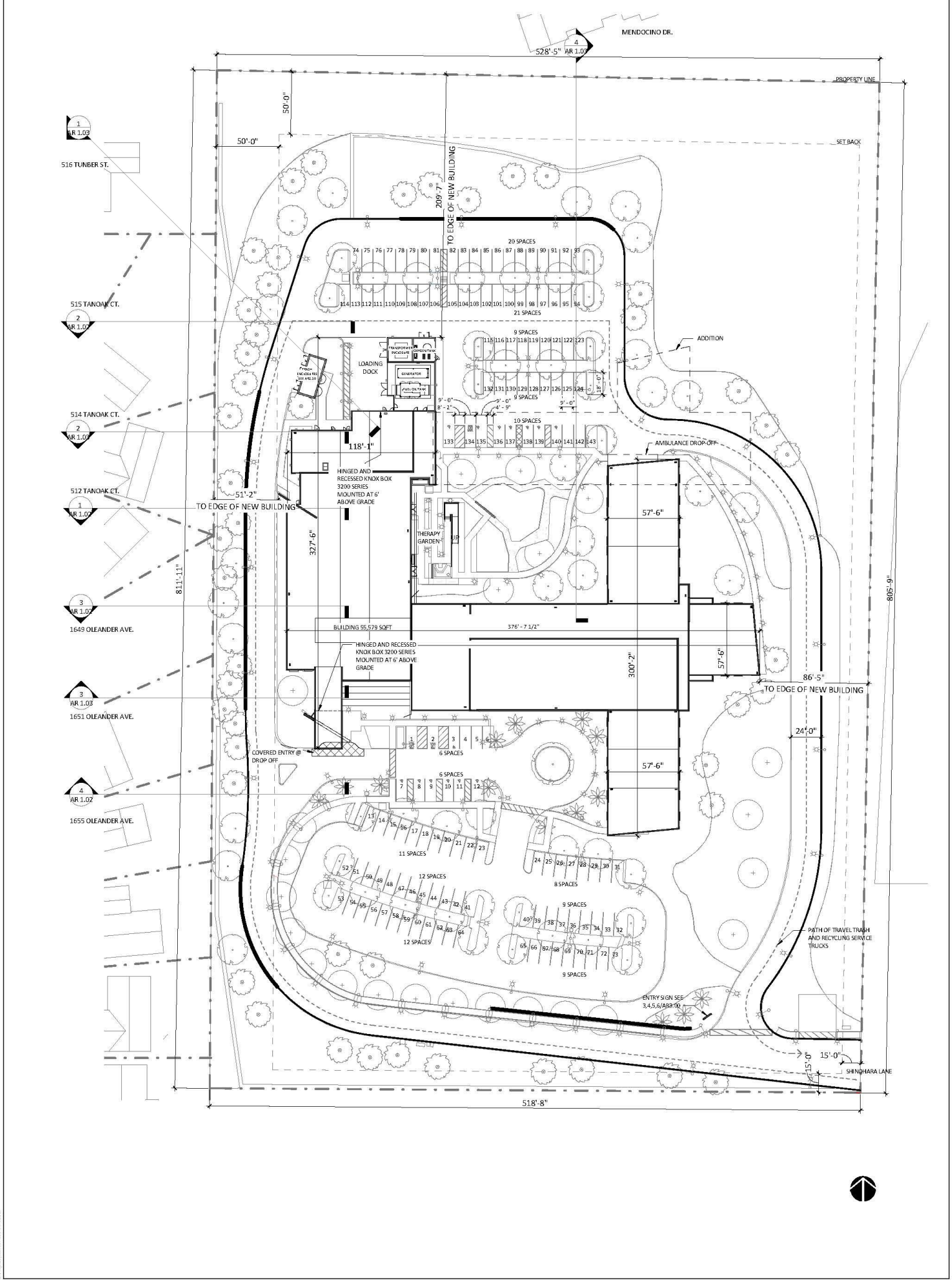
DUDEK 0 75 150 Feet

FIGURE 2

Aerial Image

Encompass Health Chula Vista

INTENTIONALLY LEFT BLANK



SOURCE: Boulder Associates 2020

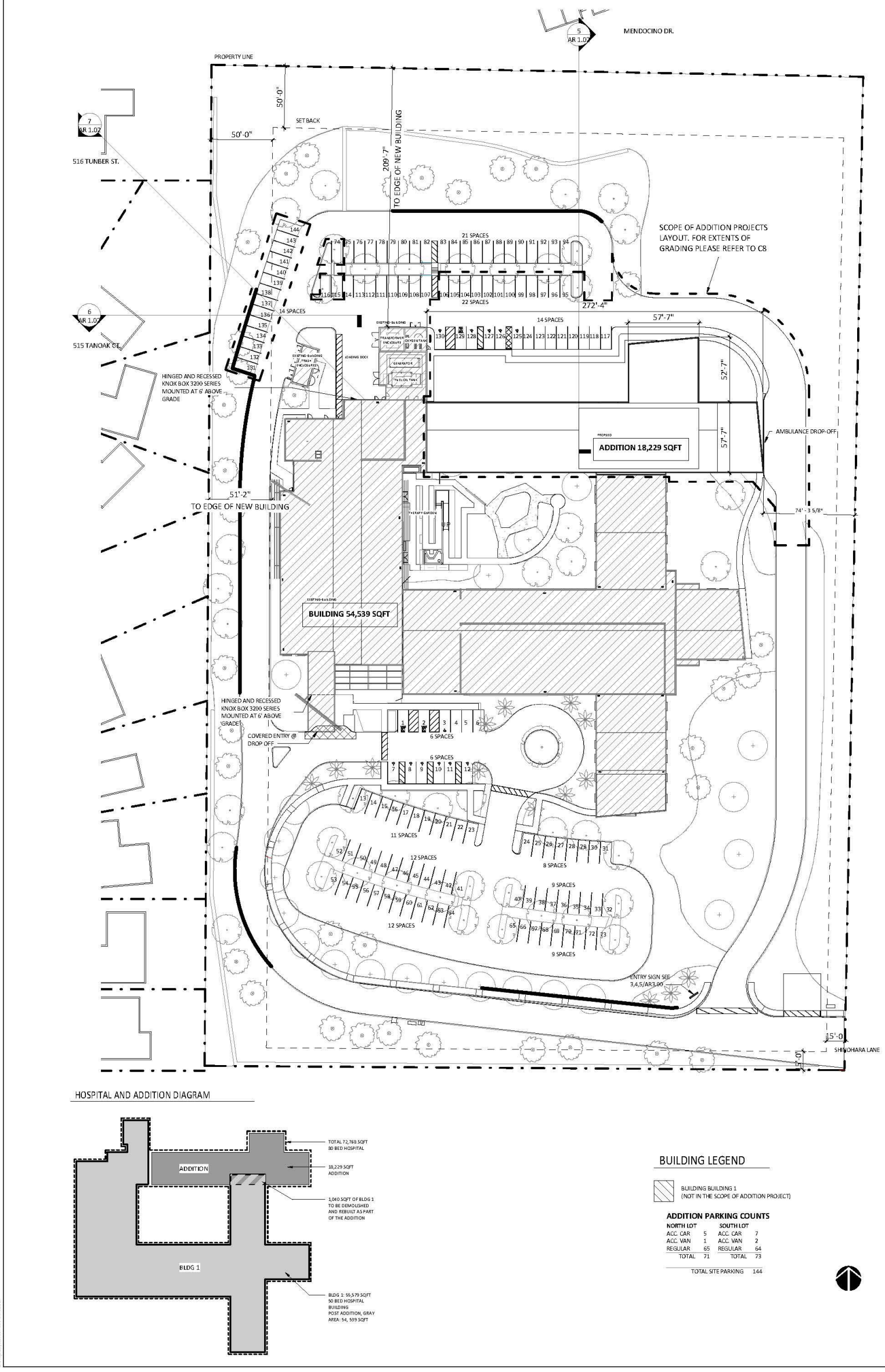
FIGURE 3a

Site Plan - Phase 1

Encompass Health Chula Vista

DUDEK

INTENTIONALLY LEFT BLANK



SOURCE: Boulder Associates 2020

DUDEK

FIGURE 3b
Site Plan - Phase 2
Encompass Health Chula Vista

INTENTIONALLY LEFT BLANK

Phasing

Phase 1 would include a one-story building located in the center of the site with a height of approximately 15 to 24 feet and 50 beds totaling approximately 56,000 square feet.[1] While the City's parking requirement calls for 1.5 spaces per patient bed (75 spaces required), this phase of the proposed project includes a total of 143 parking spaces located to both the north and south of the building within surface lots. While most patients initially arrive at the facility via a non-emergency ambulance, an ambulance bay would be provided at the northern side of the building. A drop-off circle would also be located to the south of building. Site access would be provided via Shinohara Lane.

Phase 2 consists of a one-story building addition to the northeast corner of phase 1. Phase 2 would match the phase 1 building height of approximately 15 to 24 feet and add approximately 20,000 square-feet bringing the total to approximately 76,000 square feet. This phase of the proposed project reorganizes the layout of the parking spaces to add one parking space, for a total of 144 parking spaces. The ambulance drop-off, which was previously located on the north side of phase 1, would be relocated to the east side of the building in phase 2, and the associated driveway would be moved closer to the eastern property boundary.

Architectural Design

Exterior finishes on the building would be earth toned, consisting of beige/grays, golds, charcoals, teals, and reds, as shown on Figure 4, Exterior Elevations, and detailed in the architectural plan set (Boulder Associates 2021). The building design includes varying parapet heights and façade articulation. All exterior lighting would comply with the CVMC Section 19.62.120 and would be shielded and directed downward.

Utilities

The proposed inpatient rehabilitation center would receive public water service from the Otay Water District, and public sewer service from the City of Chula Vista. An 8-inch water main is proposed within the site to connect to the existing 12-inch main running horizontally within Shinohara Lane. The project proposes a 6-inch sewer connection from the east side of the proposed building to connect to the existing sewer manhole and 8-inch pipe running south within an existing public storm drain and sewer easement. Dry utilities would be connected through Shinohara Lane to existing lines in Brandywine Avenue. The project also proposes emergency water and sewer underground tanks due to the type of use proposed. The proposed project would construct an on-site storm drain system, which would collect stormwater runoff and drain towards the southeast corner of the project site,

[1] It is noted that the current July 2020 plans include 55,579 square feet in phase 1, and phase 2 includes the demolition of 1,040 square feet and addition of 18,229 square feet. While this results in a total square footage of 72,768 square feet, this analysis herein includes the buildout of the originally estimated 76,000 square feet due to the potential for slight square footage changes and to be conservative.

where a 3-foot concrete rectangular storm drain ditch would be constructed, ultimately connecting with the existing storm drain system within Main Street. A detention basin chamber sized to 1.5 of the computed stormwater volume would be installed to capture required runoff to be cleansed via proposed Modular Wetland System. The upper underground detention basin chamber would be also utilized to detain flows for drainage purposes (APD Consultants Inc. 2021).

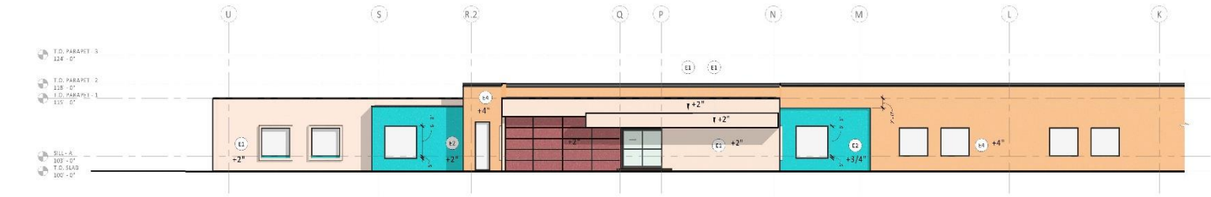
Project Access, Parking, and Circulation

Site access is proposed via a driveway at the terminus of Shinohara Lane. Shinohara Lane currently serves as access for the adjacent industrial uses located to the north and the south of the roadway. Shinohara Lane currently includes on-street parking on both sides and no signed parking spaces are expected to be removed as result of the proposed project. The terminus of Shinohara Lane includes a 48-foot radius dedicated right-of-way for a future cul-de-sac. Within this off-site area, the project proposes a hammerhead entrance consistent with City standards and to provide sufficient access for emergency services. In order for the applicant to construct the hammerhead entrance, the applicant must first obtain permission to vacate the right-of-way currently reserved for future cul-de-sac.

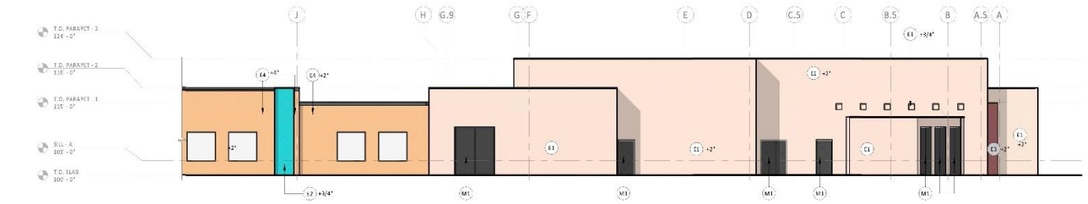
The proposed on-site driveway could connect to the hammerhead entrance. On-site circulation would include a driveway loop around the building for service, emergency, and parking access. All proposed drive aisles are a minimum of 24 feet wide and all minimum turning radii are provided to ensure adequate emergency access. Parking would be provided in surface lots on both the north and south sides of the building with a total of 144 spaces at buildout. A passenger drop-off area would be located on the south side of the building, and an ambulance drop-off area would be located to the north of the building in phase 1 and to the east in phase 2 (APD Consultants Inc. 2021).

Open Space and Landscaping

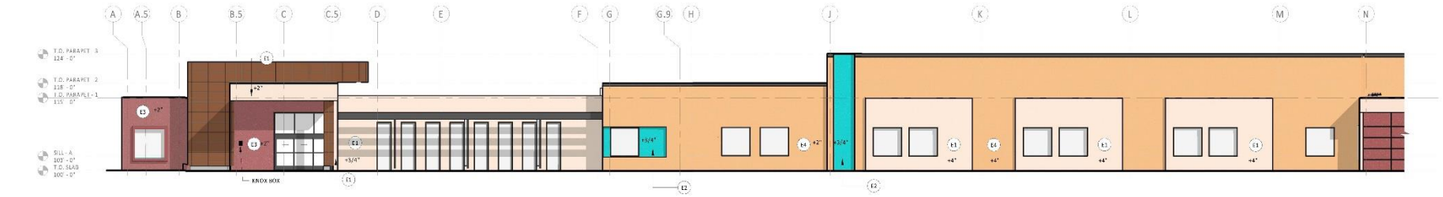
The proposed project would provide open space within the courtyard on the northern side of the building. The proposed courtyard serves patients and employees and includes Americans with Disabilities Act accessibility, meandering walkways, benches, and tree plantings. The proposed project would also include extensive landscape areas, including trees, shrubs, grasses, and groundcovers (Ridge Landscape Architects 2021). Drought tolerant plant material is used throughout much of the open space surrounding the building. Plantings on the exterior of the developed area include species meant to transition the native existing plantings on the property edge. Tree species including pines and live oaks border the property to the west to help screen the property from the existing residential neighborhood. A previously recorded open space easement is located along the northern edge of the project site, which is used by the Mendocino multi-family development. See Figures 5a and 5b, Landscape Plan, for more details.



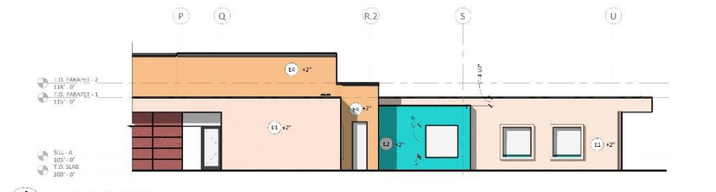
1 NORTH ELEVATION A



2 NORTH ELEVATION B

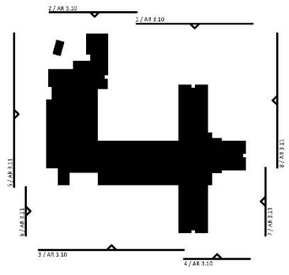


3 SOUTH ELEVATION A



4 SOUTH ELEVATION B

5 EXTERIOR FINISH EXAMPLES



EXTERIOR ELEVATION MATERIAL LEGEND

- E1 – *DFS WALL SYSTEM: COLOR SW 3073 PERFECT GREIGE
- E2 – DFS WALL SYSTEM: COLOR SW 6769 MAXI TEAL
- E3 – DFS WALL SYSTEM: COLOR SW 6333 FOXY
- E4 – DFS WALL SYSTEM: COLOR SW 2831 CLASSICAL GOLD
- M1 – ARCHITECTURALLY EXPOSED METAL FINISHED WITH COLOR: CHARCOAL TBD
- M2 – PERFORATED METAL SHEETS PATTERN TBD PURE FREE FORM ALUMINUM METAL PANEL COLOR MIDNIGHT RUST REF-013

*EIFS - EXTERIOR INSULATION FINISH SYSTEM, WITH PLASTER STUCCO FINISH

SOURCE: Boulder Associates 2020

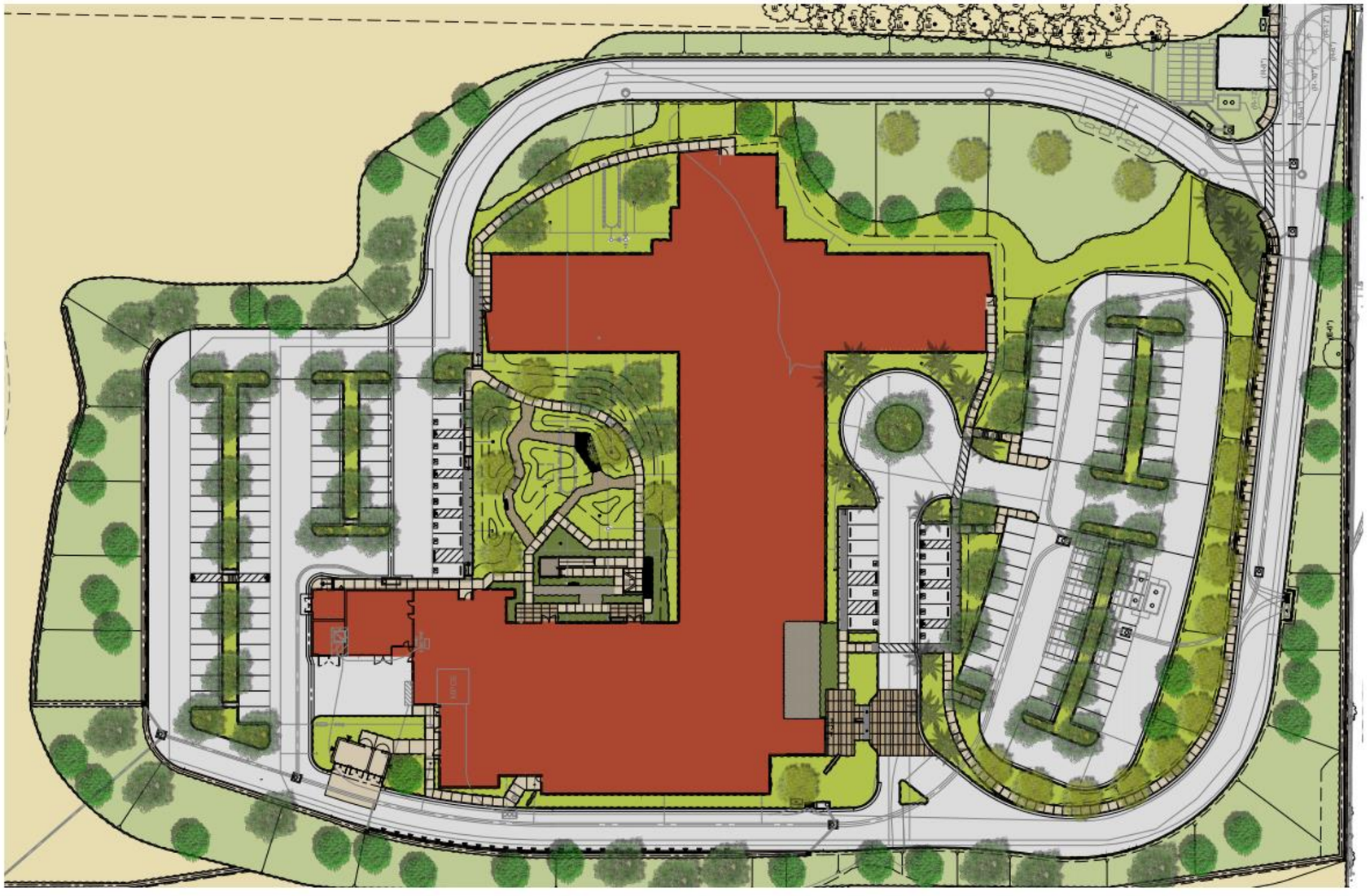
FIGURE 4

Exterior Elevations

Encompass Health Chula Vista

DUDEK

INTENTIONALLY LEFT BLANK



PROPOSED PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
TREES						
CER DES	CERCIDIUM 'DESERT MUSEUM'	DESERT MUSEUM PALO VERDE	24" BOX	PER PLAN	LOW	DECIDUOUS FLOWERING CANOPY TREE
PIN ELD	PINUS ELDARICA	MONDELL PINE	15 GAL.	PER PLAN	LOW	EVERGREEN PERIMETER SCREENING TREE
PHO MED	PHOENIX DACTYLIFERA 'MEDJOOL'	MEDJOOL DATE PALM	20' BTH	PER PLAN	LOW	ACCENT PALM
QUE AGR	QUERCUS AGRIFOLIA	COAST LIVE OAK	24" BOX (PKG.) &15 GAL.	PER PLAN	LOW	EVERGREEN PERIMETER SCREENING TREE & PARKING AREA CANOPY
SHRUBS, GRASSES, & GROUNDCOVERS						
OASIS						
AGA AME	AGAVE AMERICANA	CENTURY PLANT	5 GAL.	60" O.C.	L	LARGE SUCCULENT
ALO BG	AGAVE 'BLUE GLOW'	BLUE GLOW AGAVE	5 GAL.	36" O.C.	L	SUCCULENT ACCENT
AGA VIL	AGAVE VILMORINIANA	OCTOPUS AGAVE	5 GAL.	48" O.C.	L	SUCCULENT ACCENT
ALO BE	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	18" O.C.	L	FLOWERING SUCCULENT
ALO HER	ALOE 'HERCULES'	HERCULES ALOE	5 GAL.	48" O.C.	L	LARGE SUCCULENT
CRA CAM	CRASSULA CAPITELLA 'CAMPFIRE'	CAMPFIRE CRASSULA	1 GAL.	24" O.C.	L	SUCCULENT FOREGROUND
HES BL	HESPERALOE 'BRAKELIGHTS'	BRAKELIGHTS YUCCA	5 GAL.	36" O.C.	L	UPRIGHT ACCENT
OLE MON	OLEA EUROPEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
DROUGHT TOLERANT GARDEN						
BUL FRU	BULBINE FRUTESCENS	STALKED BULBINE	1 GAL.	24" O.C.	L	FLOWERING SUCCULENT
CAL LJ	CALLISTEMON 'LITTLE JOHN'	DWARF BOTTLE BRUSH	5 GAL.	36" O.C.	L	EVERGREEN SHRUB
CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
COT HOR	COTONEASTER HORIZONTALIS	ROCKSPRAY COTONEASTER	5 GAL.	48" O.C.	L	EVERGREEN LOW SHRUB
LAN NG	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	L	FLOWERING SHRUB
MUH RT	MUHLENBERGIA 'EL TORO'	BULL GRASS	5 GAL.	36" O.C.	L	ORNAMENTAL GRASS
OLE MON	OLEA EUROPEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
ROS PRO	ROSMARINUS O. 'PROSTRATUS'	PROSTRATE ROSEMARY	1 GAL.	24" O.C.	L	FLOWERING GROUNDCOVER
SES GL	SESLERIA AUTUMNALIS 'GREENLEE'	GREENLEE AUTUMN MOOR GRASS	1 GAL.	24" O.C.	M	ORNAMENTAL GRASS
WES RG	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
TRANSITION TO NATIVE						
ACA DC	ACACIA 'DESERT CARPET'	DESERT CARPET PROSTRATE ACACIA	1 GAL.	8' O.C.	L	LARGE SCALE GROUNDCOVER
BAC PIL	BACCHARIS P. 'TWIN PEAKS'	DWARF COYOTE BRUSH	5 GAL.	36" O.C.	L	EVERGREEN SHRUB
HET ARB	HETEROMELES ARBUTIFOLIA	TOYON	5 GAL.	10' O.C.	L	LARGE SHRUB
LEU FRU	LEUCOPHYLLUM FRUTESCENS	TEXAS RANGER	5 GAL.	48" O.C.	L	LARGE SHRUB
MIS ADA	MISCANTHUS SINENSIS 'ADAGIO'	DWARF MAIDEN GRASS	1 GAL.	36" O.C.	M	ORNAMENTAL GRASS
SAL CLE	SALVIA CLEVELANDII	CLEVELAND SAGE	5 GAL.	36" O.C.	L	FLOWERING SHRUB
SAL GRE	SALVIA GREGGII	AUTUMN SAGE	5 GAL.	36" O.C.	L	FLOWERING SHRUB
VINES						
FIC REP	FICUS REPENS	CREEPING FIG	1 GAL. STAKED	PER PLAN	M	SCREENING VINE
NATIVE PLANTING						
	EXISTING NATIVE AND NATURALIZED VEGETATION TO REMAIN					

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER "A GUIDE TO ESTIMATING IRRIGATION WATER NEEDS OF LANDSCAPE PLANTINGS IN CALIFORNIA" (ALSO REFERRED TO AS WUCOLS) FOR REGION 3.

EXISTING TREE LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME
TREES		
	EUCALYPTUS SIDEROXYLON	RED IRONBARK
	CUPANIOPSIS ANACARDIOIDES	CARROTWOOD
	PINUS SPP.	PINE

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R)INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE. THE NUMBER NEXT TO THE (E) OR (R) INDICATES THE TREE CALIPER MEASURED AT BREAST HEIGHT (DBH).

SOURCE: Boulder Associates 2020

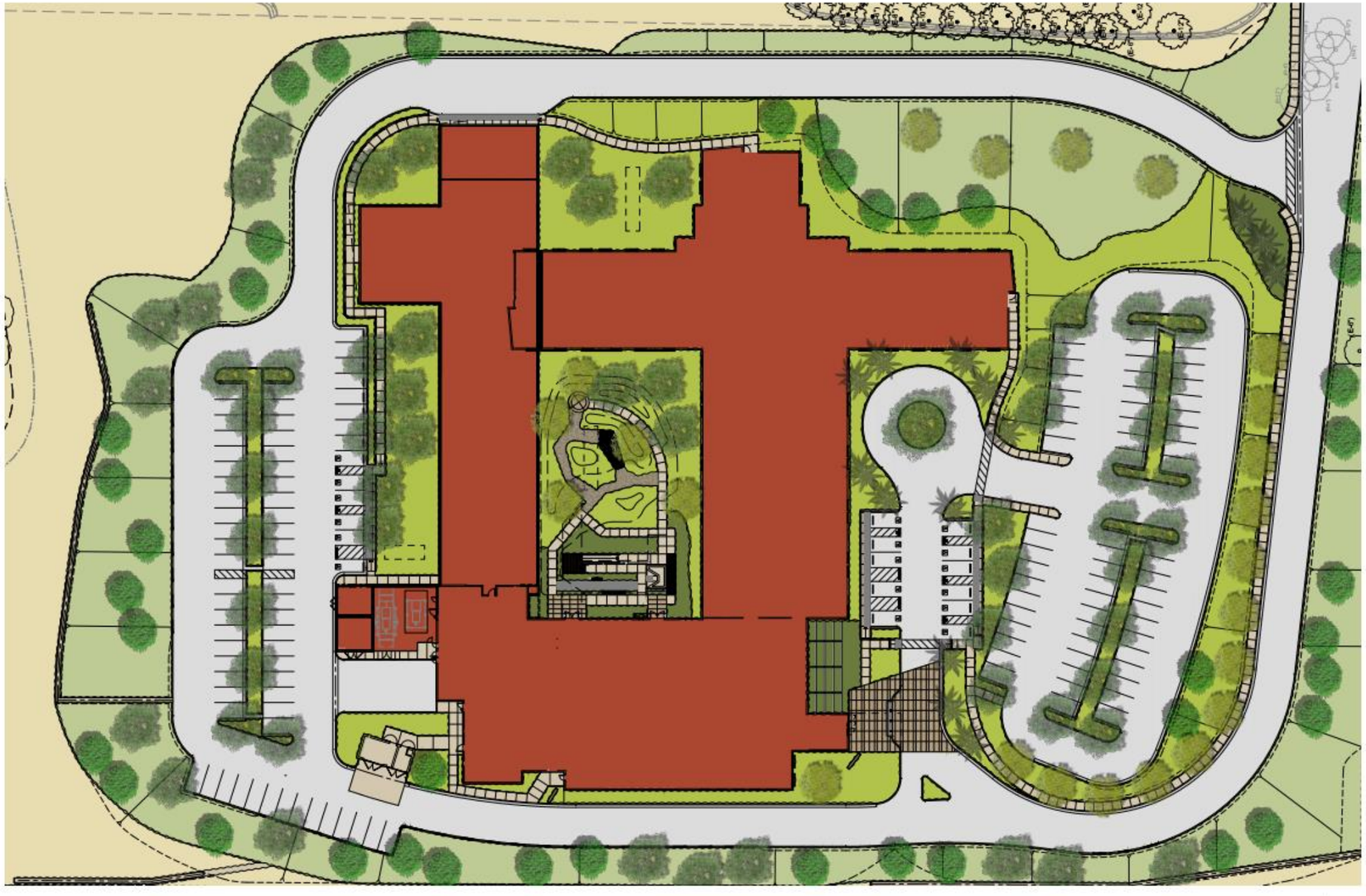
FIGURE 5a

Landscape Plan - Phase 1

Encompass Health Chula Vista

DUDEK

INTENTIONALLY LEFT BLANK



PROPOSED PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
TREES						
	CERCIDIUM 'DESERT MUSEUM'	DESERT MUSEUM PALO VERDE	24" BOX	PER PLAN	LOW	DECIDUOUS FLOWERING CANOPY TREE
	PINUS ELDARICA	MONDELL PINE	15 GAL.	PER PLAN	LOW	EVERGREEN PERMITTED SCREENING TREE
	PHOENIX DACTYLIFERA 'MEDJOOL'	MEDJOOL DATE PALM	20' BTH	PER PLAN	LOW	ACCENT PALM
	QUERCUS AGRIFOLIA	COAST LIVE OAK	24" BOX (PKG.) &15 GAL.	PER PLAN	LOW	EVERGREEN PERIMETER SCREENING TREE & PARKING AREA CANOPY
SHRUBS, GRASSES, & GROUNDCOVERS						
OASIS						
AGA AME	AGAVE AMERICANA	CENTURY PLANT	5 GAL.	60" O.C.	L	LARGE SUCCULENT
ALO BIG	AGAVE 'BLUE GLOW'	BLUE GLOW AGAVE	5 GAL.	36" O.C.	L	SUCCULENT ACCENT
AGA VIL	AGAVE VILMORINIANA	OCTOPUS AGAVE	5 GAL.	48" O.C.	L	SUCCULENT ACCENT
ALO RIC	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	18" O.C.	L	FLOWERING SUCCULENT
ALO HER	ALOE 'HERCULES'	HERCULES ALOE	5 GAL.	48" O.C.	L	LARGE SUCCULENT
CRA CAM	CRASSULA CAPITELLA 'CAMPFIRE'	CAMPFIRE CRASSULA	1 GAL.	24" O.C.	L	SUCCULENT FOREGROUND
HES PA	HESPERALOE 'BRAKELIGHTS'	BRAKELIGHTS YUCCA	5 GAL.	36" O.C.	L	UPRIGHT ACCENT
OLE MON	OLEA EUROPEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
DROUGHT TOLERANT GARDEN						
BLE FRU	BULBINE FRUTESCENS	STALKED BULBINE	1 GAL.	24" O.C.	L	FLOWERING SUCCULENT
CAL LJ	CALLISTEMON 'LITTLE JOHN'	DWARF BOTTLE BRUSH	5 GAL.	36" O.C.	L	EVERGREEN SHRUB
CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
COT HOR	COTONEASTER HORIZONTALIS	ROCKSPRAY COTONEASTER	5 GAL.	48" O.C.	L	EVERGREEN LOW SHRUB
LAN MO	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	L	FLOWERING SHRUB
MUH EX	MUHLENBERGIA 'EL TORO'	BULL GRASS	5 GAL.	36" O.C.	L	ORNAMENTAL GRASS
OLE MON	OLEA EUROPEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
ROS PRO	ROSMARINUS O. 'PROSTRATUS'	PROSTRATE ROSEMARY	1 GAL.	24" O.C.	L	FLOWERING GROUNDCOVER
SES GL	SESLERIA AUTUMNALIS 'GREENLEE'	GREENLEE AUTUMN MOOR GRASS	1 GAL.	24" O.C.	M	ORNAMENTAL GRASS
WES RIC	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
TRANSITION TO NATIVE						
ACA DC	ACACIA 'DESERT CARPET'	DESERT CARPET PROSTRATE ACACIA	1 GAL.	8' O.C.	L	LARGE SCALE GROUNDCOVER
BAC PE	BACCHARIS P. 'TWIN PEAKS'	DWARF COYOTE BRUSH	5 GAL.	36" O.C.	L	EVERGREEN SHRUB
HET ARB	HETERomeles ARBUTIFOLIA	TOYON	5 GAL.	15' O.C.	L	LARGE SHRUB
LEU FRU	LEUCOPHYLLUM FRUTESCENS	TEXAS RANGER	5 GAL.	48" O.C.	L	LARGE SHRUB
MIS ADA	MISCANTHUS SINENSIS 'YAKUSHIMA'	DWARF MAIDEN GRASS	1 GAL.	36" O.C.	M	ORNAMENTAL GRASS
SAL CLE	SALVIA CLEVELANDII	CLEVELAND SAGE	5 GAL.	36" O.C.	L	FLOWERING SHRUB
SAL GRE	SALVIA GREGGII	AUTUMN SAGE	5 GAL.	36" O.C.	L	FLOWERING SHRUB
NATIVE PLANTING						
	EXISTING NATIVE AND NATURALIZED VEGETATION TO REMAIN					

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER "A GUIDE TO ESTIMATING IRRIGATION WATER NEEDS OF LANDSCAPE PLANTINGS IN CALIFORNIA" (ALSO REFERRED TO AS WUCOLS) FOR REGION 3.

EXISTING TREE LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME
TREES		
	EUCALYPTUS SIDEROXYLON	RED IRONBARK
	CUPANIOPSIS ANACARDIOIDES	CARROTWOOD
	PINUS SPP.	PINE

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R) INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE. THE NUMBER NEXT TO THE (E) OR (R) INDICATES THE TREE CALIPER MEASURED AT BREAST HEIGHT (DBH).

SOURCE: Boulder Associates 2020

FIGURE 5b

Landscape Plan - Phase 2

Encompass Health Chula Vista

DUDEK

INTENTIONALLY LEFT BLANK

Construction

The proposed project would be constructed in two phases. The construction equipment mix and estimated hours of equipment operation per day of the proposed project are shown in Table 1. For this analysis, it was assumed that heavy construction equipment would be used 5 days a week (22 days per month) during project construction. In addition to construction equipment operation, emissions from worker trips, hauling (i.e., dump trucks) and vendor trucks (i.e., delivery trucks) were estimated. Construction of the proposed project would grade a total area of 7.76 acres. This would include 101,170 cubic yards of cut and 49,318 cubic yards of fill, with a 20% shrinkage of 20,234 cubic yards, for a net export of 31,618 cubic yards. Haul truck trips were assumed to be required during the grading, which would require approximately 3,150 haul truck trips in total. Vendor trucks transporting concrete, steel, and other building materials were assumed during the building construction, paving, and architectural coating phases. Additional details regarding construction assumptions are provided in the modeling output provided in the modeling output within the Air Quality and Greenhouse Gas Emissions (GHG) Technical Report (Appendix A).

Table 1
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase 1						
Site Preparation	6	0	0	Tractors/ Loaders/Backhoes	4	8
Grading	6	0	3,156	Excavators	1	8
Building Construction	52	16	0	Cranes	1	7
				Forklifts	3	8
				Tractors/ Loaders/Backhoes	3	7
				Generator Sets	1	8
				Welders	1	8
Paving	8	0	0	Cement and Mortar Mixers	1	6
				Pavers	1	8
				Rollers	2	6
				Tractors/ Loaders/Backhoes	1	8
				Paving Equipment	2	6
Architectural Coating	6	0	0	Air Compressors	2	6

Table 1
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
***Phase** 2*						
Site Preparation	4	0	0	Tractors/ Loaders/Backhoes	1	8
Grading	4	0	50	Concrete/Industrial Saws	1	8
				Tractors/ Loaders/Backhoes	2	6
Building Construction	110	4	0	Forklifts	2	6
				Tractors/ Loaders/Backhoes	1	8
Paving	8	0	0	Cement and Mortar Mixers	1	6
				Pavers	1	7
				Rollers	1	7
				Tractors/ Loaders/Backhoes	1	7
Architectural Coating	2	2	0	Air Compressors	1	6

Source: Appendix A.

C. PROJECT DESIGN FEATURES

Project Design Features (PDFs) are project components that would be incorporated into the design of the project. Project Design Features are not mitigation measures; rather, they are additional measures taken by the applicant, that further improve or reduce the environmental conditions that may be impacted by a project.

To reduce construction and operational emissions to the extent feasible, and to ensure safe and efficient transportation facilities are provided, the applicant would incorporate the following air quality and greenhouse gas reduction PDFs, as well as two transportation PDFs into the project:

PDF-AQ-1 **Fugitive Dust Control**. Prior to the issuance of a grading permit, the grading plans shall require the Developer or its designee shall implement the following measures to minimize fugitive dust (PM_{10} and $PM_{2.5}$):

a. A non-toxic dust control agent shall be used on the grading areas or watering shall be applied at least three times daily.
b. Grading areas shall be stabilized as quickly as possible.
c. Chemical stabilizer shall be applied, a gravel pad shall be installed, or the last 100 feet of internal travel path within the construction site shall be paved prior to public road entry and for all haul roads.

d. Visible track-out into traveled public streets shall be removed with the use of sweepers, water trucks, or similar method at the end of the workday.
e. All soil disturbance and travel on unpaved surfaces shall be suspended if winds exceed 25 miles per hour.
f. On-site stockpiles of excavated material shall be covered.
g. A 15 mile per hour speed limit on unpaved surfaces shall be enforced.

PDF-AQ-2 **Building Materials.** Prior to the issuance of a grading permit, the grading plans shall require the use of low or no-volatile organic compound (VOC) products and recycled building materials, where feasible.

PDF-GHG-1 **Building Heat Index.** Prior to the issuance of a building permit, the building plans shall include a passive sustainable design by sun orientation window placement, insulated exterior for efficient heating and cooling, shaded frames, or other equivalent measures for reduced heat gain.

PDF-GHG-2 **Energy-Efficient Appliances.** Prior to the issuance of a building permit, the building plans shall include a high-efficiency electrical and heating, ventilation, and air conditioning (HVAC) system.

PDF-GHG-3 **Water-Efficient Plumbing.** Prior to the issuance of a building permit, the building plans shall include water-efficient plumbing.

PDF-GHG-4 **Drought-Tolerant Vegetation.** Prior to the issuance of a building permit, the landscape plans shall be verified to include native, drought-tolerant vegetation that would use less water than other common species.

PDF-TRA-1 Prior to issuance of an occupancy permit, the project applicant shall implement the traffic signal modification at the Brandywine Avenue/Main Street intersection and receive Traffic Signal Fee credits from the City.

PDF-TRA-2 Prior to issuance of a construction permit, the project applicant shall obtain a street vacation in order to vacate the current 48-foot wide radius dedicated right-of-way for future cul-de-sac at the existing terminus of Shinohara Lane.

D. Identification of Environmental Effects

An Initial Study conducted by the City determined that the proposed project may have potential significant environmental impacts; however, mitigation measures have been incorporated into the

project to reduce these impacts to a less than significant level. This MND has been prepared in accordance with Section 15070 of the CEQA Guidelines.

E. Mitigation Necessary to Avoid Significant Impacts

Biological Resources

MM-BIO-1 **Compensatory Uplands Mitigation:** Prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits, the project applicant shall mitigate direct impacts to 0.06 acre of coastal sage scrub habitat pursuant to the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (Subarea Plan) and Habitat Loss Incidental Take (HLIT) Ordinance. Per the HLIT ordinance, impacts to coastal sage scrub shall be mitigated at the ratios identified in the MSCP Subarea Plan Table 5-3. Considering the project site is located outside of the preserve, coastal sage scrub mitigation provided in the Preserve shall be at a 1:1 ratio and coastal sage scrub mitigation provided outside of the Preserve shall be at a 1:1.5 ratio. Mitigation shall be provided through one or a combination of the following options:

Mitigation Bank. The applicant shall secure mitigation credits within a City-approved Conservation Bank or other City-approved location offering mitigation credits. Mitigation credits shall be for habitat of equivalent or higher habitat value than coastal sage scrub, with value determined consistent with the Subarea Plan tier system (see Subarea Plan Table 5-3). The San Diego County Water Authority's San Miguel Conservation Bank, located in Chula Vista, is a conservation bank with ample coastal sage scrub acre-credits that could be utilized upon City approval. The applicant is required to provide the City with verification of mitigation credit purchase prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits.

On-site Habitat Restoration. The project applicant shall provide 0.09 acre of on-site restoration of coastal sage scrub habitat and preservation of the restored habitat in perpetuity. Restoration will occur in an area of disturbed habitat adjacent to the impacted coastal sage scrub on the site. Given the limited size of the impacts to coastal sage scrub from the project and the urban setting of the site, restoration of disturbed habitat will be sufficient to ensure no net loss of coastal sage scrub habitat on the site. The restoration shall achieve 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The on-site habitat restoration mitigation site shall be preserved through (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) the designation of a permanent responsible party, and (3) be managed in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan can be a memorandum or letter report, but at minimum shall include the following: an implementation plan (possessing a plant palette with appropriate coastal sage scrub plant species), established performance criteria outlining native/non-native cover goals, container plant survival rate goals, maintenance and monitoring (to be performed by a qualified restoration technician), and additional measures as needed to meet the performance criteria of maintaining 60 percent native plant cover. Prior to grading permit issuance, the project applicant shall provide proof that funds required to implement the restoration according to the Habitat Management Plan have been provided to the permanent responsible party.

On-site Habitat Preservation and Restoration. The project applicant shall provide on-site preservation of the remaining coastal sage scrub habitat not impacted by the project in addition to an adjoining area of restored habitat as described in the previous mitigation option; the combination of these areas would need to be 0.09 acre or more. Currently, the coastal sage scrub on the site possesses less than 60% of native coastal sage scrub species. This measure would ensure the enhancement of the both the preserved and restored areas with the goal of achieving 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The combination of on-site habitat preservation and restoration shall be ensured through: (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) a permanent responsible party clearly designated, and (3) management in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan shall be the same as is described in the previous mitigation option and will be intended to maintain 60 percent cover by native plants characteristic of coastal sage scrub habitat within the restored and preserved area. Prior to grading permit issuance, the project applicant shall provide proof that such funds have been provided to the permanent responsible party.

MM-BIO-2 **Pre-construction Burrowing Owl Survey:** Prior to issuance of any land development permits (including clearing, grubbing, and grading permits), the project applicant shall retain a qualified biologist to conduct focused pre-construction surveys for burrowing

owls. The qualified biologist shall have a B.S. in biology or related field, and two years of field work experience in California. The surveys shall be performed no earlier than 30 days prior to the commencement of any clearing, grubbing, or grading activities. If burrowing owls are observed, the qualified biologist shall work with the City to determine if the owls are migratory or if the owls are occupying burrows. If occupied burrows are detected, the qualified biologist shall prepare a passive relocation mitigation plan subject to the review and approval by the Wildlife agencies and City, including any subsequent burrowing owl relocation plans to avoid impacts from construction-related activities. The plan shall be prepared according to the performance measures set forth in the Staff Report on Burrowing Owl Mitigation prepared by the State of California Natural Resource Agency Department of Fish and Game dated March 7, 2012.

MM-BIO-3 **Avoidance of Nesting Bird Impacts:** Prior to the issuance of a grading permit, to avoid any direct or indirect impacts any species identified as a candidate, sensitive, or special status species in the HLIT, MSCP Subregional Plan, or other local or regional plans, policies or regulations, or by the CDFW or USFWS, removal of habitat that supports active nests in the project study area should occur outside of the breeding season of these species (February 1 to September 15), where feasible. If removal of habitat must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted no more than 72 hours prior to the start of construction activities (including removal of vegetation). If nesting birds are detected, a letter report or mitigation plan in conformance with the HLIT and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, and construction barriers/buffers) shall be prepared by a qualified biologist and include proposed measures to be implemented to ensure that take of birds or eggs is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City, and shall be required to be displayed on the grading plans for the proposed project.

Cultural Resources

MM-CUL-1 Prior to the issuance of any demolition or grading permit, the Project Applicant shall demonstrate to the satisfaction of the City Development Services Department

that a program related to potential archaeological resources uncovered during construction activities on-site has been established. The program shall include that:

1. The Project Applicant shall retain a qualified professional Archaeologist and Native American Monitor approved by the City to be present and monitor all ground-disturbing activities in native, undisturbed soils. The Archaeologist shall meet the Secretary of the Interior's Professional Qualification Standards to assess the potential significance of the discovery and propose appropriate mitigation per the California Environmental Quality Act (CEQA) or Section 106 of the National Historic Preservation Act. The Native American Monitor shall be affiliated with a Native American tribe recognized to have a historic use of the area.

2. The Archaeologist shall halt work within 200-feet of the discovery in the event that archaeological resources are identified until the Archaeologist has evaluated the find and determine if the resource is a unique cultural resource as defined in Section 21083.2 (g) of the CEQA statutes, or if the resource qualifies as a significant tribal resource as determined in consultation with the Tribal monitor and as defined in Public Resources Code Section 21074.

3. If the resources is determined to be significant, the City shall be notified in writing by the Archaeologist and either (1) avoidance of the resource shall be completed or (2) recovery shall be completed prior to commencement of work within 200 feet.

4. If recovery is to be completed, the resource shall be recovered by the qualified archaeologist and, if applicable, in consultation with the Native American monitor.

5. Within 30 days of the completion of the recovery, a report shall be provided to the City, San Diego State University, and appropriate Native American Representatives. The report shall document the resource discovered in accordance with the Instructions for Recording Historical Resources (Office of Historic Preservation 1995) to preserve the information provided by the resource.

6. Within 60 days of recovery, the resource shall be submitted for curation to the San Diego Natural History Museum at the expense of the applicant or, as applicable, appropriated to the Native American tribe recognized to have a historic use of the area.

MM CUL-2: Prior to the issuance of any demolition or grading permit, the Project Applicant shall demonstrate to the satisfaction of the City Development Services Department that a program related to any human remains that might be encountered during ground-disturbing activities on-site has been established, the program shall include:

1. The Project Applicant shall halt work in the immediate area of the find;

2. The Project Applicant shall contact the San Diego County Coroner, City Development Services Department, and Sherriff's Department;

3. The Project Applicant shall be responsible for ensuring that the Native American Heritage Commission (NAHC) and the appropriate Native American representatives are contacted and that the NAHC contacts the most appropriate most likely descendant (MLD) as maybe directed by either the San Diego County Coroner, City Development Services Department, or Sherriff's Department;

4. The City Development Services Department shall direct the treatment of the remains pursuant to Coroner and MLD recommendations.

Geology and Soils

MM-GEO-1 Prior to the issuance of grading permits, the applicant shall provide written confirmation to the City that a qualified paleontologist has prepared a PRIMP and has been retained to carry out the PRIMP. A qualified paleontologist is defined as an individual with an MS or PhD in paleontology or geology who is familiar with paleontological procedures and techniques and has expertise in local geology, stratigraphy, and biostratigraphy. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP) (2010) and contain the following components:

- Introduction to the project, including project location, description grading activities with the potential to impact paleontological resources, and underlying geologic units.
- Description of the relevant laws, ordinances, regulations, and standards pertinent to the project and potential paleontological resources.
- Requirements for the qualified paleontologist to attend the pre-construction meeting and provide worker environmental awareness training at the pre-construction meeting as well as at the jobsite the day grading is to be initiated. In addition, the qualified paleontologist shall inform the grading contractor and

City Resident Engineer of the paleontological monitoring program methodologies.

- Identification of where paleontological monitoring of excavations impacting the San Diego Formation, very old paralic deposits (Lindavista Formation), and old alluvial floodplain deposits, is required within the project site based on construction plans and/or geotechnical reports.
- Procedures for adequate paleontological monitoring (including necessary monitoring equipment), methods for treating fossil discoveries, fossil recovery procedures, and sediment sampling for microvertebrate fossils, including the following requirements:
    - A paleontological monitor shall be on site at all times during the original cutting of previously undisturbed sediments of moderately to highly sensitive geologic units (e.g., San Diego Formation, very old paralic deposits, and old alluvial floodplain deposits) to inspect cuts for contained fossils. (A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.) The paleontological monitor shall work under the direction of a qualified paleontologist. Monitoring is not required during excavation within low resource sensitivity geological units (e.g., young alluvial flood-plain deposits) if determined to be present within the project site.
    - Paleontological monitoring is not required in areas underlain by artificial fill unless grading activities are anticipated to extend beneath the veneer of fill and impact underlying geological units with moderate to high paleontological sensitivity (e.g., San Diego Formation, very old paralic deposits [Lindavista Formation], and/or old alluvial floodplain deposits).
    - If fossils are discovered, the qualified paleontologist and/or paleontological monitor shall recover them. The paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading within 50 feet of the resource to allow recovery of fossil remains. Because of the potential for the recovery of small fossil remains, it may be necessary in certain instances, and at the discretion of the qualified paleontologist, to set up a screen-washing operation on the project site. Alternatively, sediment samples can be collected and processed off-site.
- Paleontological reporting, and collections management:
    - Prepared fossils along with copies of all pertinent field notes, photos, maps, and the final paleontological monitoring report discussed below shall be deposited in a scientific institution with paleontological collections such as the San Diego Natural History Museum within 90 days of completion of monitoring unless the City and the qualified paleontologist determine the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time. Any curation costs shall be paid for by the applicant.

- A final paleontological monitoring report shall be completed. This report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils, and shall be submitted to the designated scientific institution within 90 days of the completion of monitoring unless the City and the qualified paleontologist determine the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time.

Noise

MM-N-1 Prior to the issuance of a Conditional Use Permit, the City shall include a condition that requires the following:

Prior to backup generator testing, the project owner/manager (or its testing contractor) shall install a temporary sound blanket on the chain-link fence that forms the western perimeter of the backup generator outdoor space. (Alternately, the sound barrier may be hung or suspended from a free-standing structure external to and parallel with the chain-link fence; or, the barrier could be formed from an arrangement of panels. Either method may be required to ensure proper airflow to the operating generator, or to expedite barrier setup on site.) The installed temporary sound blanket, curtain, or panel assembly shall feature a minimum sound transmission class (STC) rating of at least 15, and if arranged as multiple elements must not exhibit air-gaps through which noise may bypass the barrier material. When the generator testing is completed, the temporary sound barrier can be disassembled and removed from the site (or stored on site, per project owner/manager discretion) until needed for the subsequent monthly test.

Transportation

MM-TRA-1 Prior to issuance of occupancy permit, to provide additional storage length for vehicles at the Brandywine Avenue/Main Street intersection, the project applicant shall:

- Re-stripe the eastbound left-turn lane to accommodate additional vehicle storage. The existing median along Main Street shall be re-striped to extend the eastbound left-turn lane to approximately 300 feet to provide adequate vehicle storage;
- Install "KEEP CLEAR" pavement markings on Brandywine Avenue in front of the existing commercial driveway located north of the intersection, to allow vehicles to access the commercial use north of the "KEEP CLEAR" pavement markings; the southbound approach can be re-striped to accommodate additional storage for the southbound left- and right turn lanes.

F. AGREEMENT TO IMPLEMENT MITIGATION MEASURES

By signing the line(s) provided below, the Applicant and Operator stipulate that they have each read, understood and have their respective company's authority to and do agree to the mitigation measures contained herein, and will implement same to the satisfaction of the Environmental Review Coordinator. Failure to sign the line(s) provided below prior to posting of this Mitigated Negative Declaration with the County Clerk shall indicate the Applicant's and Operator's desire that the Project be held in abeyance without approval and that the Applicant and Operator shall apply for an Environmental Impact Report.

_____ _____

Printed Name and Title of Applicant Date

_____ _____

Signature of Applicant Date

G. CONSULTATION

1. Individuals and Organizations

   City of Chula Vista:

   Others:

   Dawna Marshall, Dudek

2. Initial Study

This environmental determination is based on the City's Initial Study. The report reflects the independent judgment of the City of Chula Vista. Further information regarding the environmental review of this project is available from the Development Services Department, 276 Fourth Avenue, Chula Vista, California 91910.

_____ _____

Jeff Steichen Date:
Development Services Department

INTENTIONALLY LEFT BLANK

ENCOMPASS HEALTH PROJECT
INITIAL STUDY

Environmental Checklist Form

1. Proponent Name, Address and Contact:	Encompass Health California Real Estate, LLC. 9001 Liberty Parkway Birmingham, Alabama 35242 Contact: John Tschudin 205.970.5677
2. Lead Agency Name, Address and Contact:	City of Chula Vista Development Services Department 276 Fourth Avenue Chula Vista, California 91910
3. Name of Proposal:	Encompass Health
4. Date of Checklist:	February 8, 2021
5. Case No.	IS19-0003
6. General Plan Designation:	Limited Industrial
7. Zoning Designation:	ILP (Limited Industrial with Precise Plan overlay)

8. Project Description:

PROJECT LOCATION AND SETTING

The proposed Encompass Health Chula Vista project (proposed project) is located at 517 Shinohara Lane, east of Interstate 805 (I-805), west of Brandywine Avenue, and north of Main Street. The site is on the U.S. Geological Survey 7.5-minute Imperial Beach Quadrangle in Section 19 in Township 18 South and Range 2 West (Figure 1, Project Location). The project site consists of the Assessor's Parcel Number (APN), which is 644-040-01-00 and is a total of 9.79-acres (Figure 2, Aerial Image). Due to its abnormal configuration, it is further noted that the parcel for this site includes two disjointed areas; the main area where the proposed structures are located and a narrow long strip that is located to the south of Shinohara Lane and extends to Main Street.

The site is within an urbanized portion of the City of Chula Vista (City). The site is surrounded by residential to the north and west, and industrial uses to the east and south. The surrounding residential includes the Mendocino multi-family development to the north and the Princess Manor

single-family subdivision to the west. To the east and south are industrial uses such as Jabil manufacturing, Penske Collision Center, Lyon Technologies, Surgical Specialties, Curbell Plastics, and Technico Corporation.

The project site has been previously disturbed and graded. The site is vacant with steep terrain sloping north downward to the south. Elevations range from approximately 143 above mean sea level (amsl) in the southeastern portion of the site, and up to approximately 257 feet amsl in the north portion of the site. There are existing concrete v-gutter drainage channels within the project site, as well as bordering the site to the east and south. An unlined drainage channel also exists directly west of the site. Surface flows under existing conditions drain toward the southern end of the site.

The City of Chula Vista General Plan, Land Use Element designates the proposed project site as Limited Industrial (IL), which is intended for light manufacturing; warehousing; certain public utilities; auto repair; auto salvage yards; and flexible-use projects that combine these uses with associated office space (City of Chula Vista 2017).

The project site is zoned Limited Industrial – Precise Plan Modifying District (ILP). The proposed inpatient rehabilitation center is an Unclassified Use pursuant to Section 19.54.020(h) of the Chula Vista Municipal Code (CVMC). As such, the proposed use would be permitted in this zone subject to approval of a Conditional Use Permit approved by the Planning Commission. The project includes a waiver from CVMC Section 19.58.360, which requires a site wall to screen the development from neighbors. This waiver is requested because the topography, proximity of uses, existing fencing, and landscaping would provide sufficient visual screening and protection between the property and the neighbors. The project site is surrounded by residential and industrial land use designations.

PROJECT DESCRIPTION

The project proposes up to an 80-bed inpatient rehabilitation facility with supporting amenities on the 9.79-acre site (Figures 3a and 3b, Site Plan). The project would be developed in two phases with phase 1 consisting of up to 50 beds and phase 2 providing an additional 30 beds. Figure 3a shows the phase 1 site plan. Figure 3b shows the phase 2 site plan. The proposed inpatient rehabilitation center uses would be to provide recovery from medical issues such as amputation, multiple trauma, arthritis, neurological disorders, brain injuries, burns, stroke, or spinal cord injury. As such, the center would include specialized rehabilitation and evaluation rooms in addition to patient rooms. Patients are assumed to be transported to the facility via a non-emergency ambulance and stay at the center until their release. Considering the type of care to be provided

and based on similar facilities operated by the applicant, the 80-bed facility is expected to have approximately 210 daily employees.

Phasing

Phase 1 would include a one-story building located in the center of the site with a height of approximately 15 to 24 feet and 50 beds totaling approximately 56,000 square feet.[2] While the City's parking requirement calls for 1.5 spaces per patient bed (75 spaces required), this phase of the proposed project includes a total of 143 parking spaces located to both the north and south of the building within surface lots. While most patients initially arrive at the facility via a non-emergency ambulance, an ambulance bay would be provided at the northern side of the building. A drop-off circle would also be located to the south of building. Site access would be provided via Shinohara Lane.

Phase 2 consists of a one-story building addition to the northeast corner of phase 1. Phase 2 would match the phase 1 building height of approximately 15 to 24 feet and add approximately 20,000 square-feet bringing the total to approximately 76,000 square feet. This phase of the proposed project reorganizes the layout of the parking spaces to add one parking space, for a total of 144 parking spaces. The ambulance drop-off, which was previously located on the north side of phase 1, would be relocated to the east side of the building in phase 2, and the associated driveway would be moved closer to the eastern property boundary.

Architectural Design

Exterior finishes on the building would be earth toned, consisting of beige/grays, golds, charcoals, teals, and reds, as shown on Figure 4, Exterior Elevations, and detailed in the architectural plan set (Boulder Associates 2021). The building design includes varying parapet heights and façade articulation. All exterior lighting would comply with the CVMC Section 19.62.120 and would be shielded and directed downward.

Utilities

The proposed inpatient rehabilitation center would receive public water service from the Otay Water District, and public sewer service from the City of Chula Vista. An 8-inch water main is proposed within the site to connect to the existing 12-inch main running horizontally within Shinohara Lane. The project proposes a 6-inch sewer connection from the east side of the proposed building to connect to the existing sewer manhole and 8-inch pipe running south within an existing public storm drain and sewer easement. Dry utilities such as electrical, gas and cable would be connected through

[2] It is noted that the current July 2020 plans include 55,579 square feet in phase 1, and phase 2 includes the demolition of 1,040 square feet and addition of 18,229 square feet. While this results in a total square footage of 72,768 square feet, this analysis herein includes the buildout of the originally estimated 76,000 square feet due to the potential for slight square footage changes and to be conservative.

Shinohara Lane to existing lines in Brandywine Avenue. The project also proposes emergency water and sewer underground tanks due to the type of use proposed. The proposed project would construct an on-site storm drain system, which would collect stormwater runoff and drain towards the southeast corner of the project site, where a 3-foot concrete rectangular storm drain ditch would be constructed, ultimately connecting with the existing storm drain system within Main Street. A detention basin chamber sized to 1.5 of the computed stormwater volume would be installed to capture required runoff to be cleansed via proposed Modular Wetland System. The upper underground detention basin chamber would be also utilized to detain flows for drainage purposes (APD Consultants Inc. 2021).

Project Access, Parking, and Circulation

Site access is proposed via a driveway at the terminus of Shinohara Lane. Shinohara Lane currently serves as access for the adjacent industrial uses located to the north and the south of the roadway. Shinohara Lane currently includes on-street parking on both sides and no signed parking spaces are expected to be removed as result of the proposed project. The terminus of Shinohara Lane includes a 48-foot radius dedicated right-of-way for a future cul-de-sac. Within this off-site area, the project proposes a hammerhead entrance consistent with City standards and to provide sufficient access for emergency services. In order for the applicant to construct the hammerhead entrance, the applicant must first obtain permission to vacate the right-of-way currently reserved for future cul-de-sac

The proposed on-site driveway could connect to the hammerhead entrance. On-site circulation would include a driveway loop around the building for service, emergency, and parking access. All proposed drive aisles are a minimum of 24 feet wide and all minimum turning radii are provided to ensure adequate emergency access. Parking would be provided in surface lots on both the north and south sides of the building with a total of 144 spaces at buildout. A passenger drop-off area would be located on the south side of the building, and an ambulance drop-off area would be located to the north of the building in phase 1 and to the east in phase 2 (APD Consultants Inc. 2021).

Open Space and Landscaping

The proposed project would provide open space within the courtyard on the northern side of the building. The proposed courtyard serves patients and employees and includes Americans with Disabilities Act accessibility, meandering walkways, benches, and tree plantings. The proposed project would also include extensive landscape areas, including trees, shrubs, grasses, and groundcovers (Ridge Landscape Architects 2021). Drought tolerant plant material is used throughout much of the open space surrounding the building. Plantings on the exterior of the developed area include species meant to transition the native existing plantings on the property edge. Tree species including pines and live oaks border the property to the west to help screen the property from the existing residential neighborhood. A previously recorded open space easement is located along the

northern edge of the project site, which is used by the Mendocino multi-family development. See Figures 5a and 5b, Landscape Plan, for more details.

Construction

The proposed project would be constructed in two phases. The construction equipment mix and estimated hours of equipment operation per day of the proposed project are shown in Table 1. For this analysis, it was assumed that heavy construction equipment would be used 5 days a week (22 days per month) during project construction. In addition to construction equipment operation, emissions from worker trips, hauling (i.e., dump trucks) and vendor trucks (i.e., delivery trucks) were estimated. Construction of the proposed project would grade a total area of 7.76 acres. This would include 101,170 cubic yards of cut and 49,318 cubic yards of fill, with a 20% shrinkage of 20,234 cubic yards, for a net export of 31,618 cubic yards. Haul truck trips were assumed to be required during the grading, which would require approximately 3,150 haul truck trips in total. Vendor trucks transporting concrete, steel, and other building materials were assumed during the building construction, paving, and architectural coating phases. Additional details regarding construction assumptions are provided in the modeling output provided in the modeling output within the Air Quality and Greenhouse Gas Emissions (GHG) Technical Report (Appendix A).

Table 1
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase 1						
Site Preparation	6	0	0	Tractors/ Loaders/Backhoes	4	8
Grading	6	0	3,156	Excavators	1	8
Building Construction	52	16	0	Cranes	1	7
				Forklifts	3	8
				Tractors/ Loaders/Backhoes	3	7
				Generator Sets	1	8
				Welders	1	8
Paving	8	0	0	Cement and Mortar Mixers	1	6
				Pavers	1	8
				Rollers	2	6
				Tractors/ Loaders/Backhoes	1	8
				Paving Equipment	2	6
Architectural Coating	6	0	0	Air Compressors	2	6

Table 1
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase 2						
Site Preparation	4	0	0	Tractors/ Loaders/Backhoes	1	8
Grading	4	0	50	Concrete/Industrial Saws	1	8
				Tractors/ Loaders/Backhoes	2	6
Building Construction	110	4	0	Forklifts	2	6
				Tractors/ Loaders/Backhoes	1	8
Paving	8	0	0	Cement and Mortar Mixers	1	6
				Pavers	1	7
				Rollers	1	7
				Tractors/ Loaders/Backhoes	1	7
Architectural Coating	2	2	0	Air Compressors	1	6

Source: Appendix A.

ENVIRONMENTAL ANALYSIS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS				
Would the project:				
a) Have a substantial adverse effect 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?	☐	☐	☐	☒
c) In non-urbanized areas, 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Aesthetics Comments:

a) Less-Than-Significant Impact. Chula Vista General Plan identifies designated scenic vistas and open space. Relevant to the project viewshed, designated scenic vistas include the Otay River and Sweetwater River Valleys; Upper and Lower Otay Lakes; Sweetwater Reservoir; San Miguel/Mother Miguel Mountains; and the San Diego Bay. As indicated in the City's General Plan Land Use Element, Main Street is considered a scenic roadway

from I-805 to its future connection to Hunte Parkway ending at Proctor Valley Road. Additionally, Main Street east of I-805 is considered a Gateway Street. This gateway provides access to the Auto Park and commercial recreation venues within the Otay Valley, including an amphitheater and water park. Views to the project site from Main Street are intermittent, as the views are interrupted by existing commercial development between the project site and Main Street. There are no designated scenic vistas that include the project site. As there are no designated scenic vistas on or surrounding the project site, and views to the project site would be interrupted by existing development along Main Street; impacts would be less than significant.

b) No Impact. The closest state highway to the project site is I-805. This highway is not a designated state scenic highway per the Department of Transportation (Caltrans) State Scenic Highway Program. Additionally, the project site is not visible from I-805 and no significant scenic resources such as trees, rock outcroppings, or historic buildings are present. Therefore, the proposed project would not damage scenic resources within a state scenic highway, and no impact would occur.

c) Less-Than-Significant Impact. The proposed project site is in an urbanized area surrounded by development and was previously graded. In accordance with the Zoning Ordinance, the proposed project would comply with all applicable city design standards regarding height, setbacks, grading. The maximum height in the I-L zone is 45 feet and required setbacks are 20 feet front and 50 feet side/rear. The proposed project is 15 to 24 feet in height and is situated more than 50 feet from any property line. A retaining wall along the western boundary of the project site would be installed, at a proposed maximum height of 4.8 feet. Exterior finishes on the building would be earth toned, consisting of beige/grays, golds, charcoals, teals, and reds, as shown on Figure 4, Exterior Elevations. The building design includes varying parapet heights and façade articulation. The proposed project would include extensive landscape areas, including trees, shrubs, grasses, and groundcovers (Figure 5a and 5b, Landscape Plans).

CVMC Section 19.58.360 requires a screening wall between industrial or commercial uses and residential properties be provided to screen and protect the residential uses or that the adjacent areas are sufficiently screened and protected without said wall or fence. In accordance with CVMC Section 19.58.360, the project has demonstrated that the topography, grading and landscaping would provide sufficient screening and protection between the property and the residential neighbors and a visual screening wall is not warranted. This was demonstrated through a series of cross sections and view simulations included in the project plan set (Boulder Associates, Inc. 2021) as well as provided in Figure 6 of this MND. These view Simulations, demonstrates the views of the project from

surrounding residential areas. As shown, the landscaping, building design, building position and topography combined will adequately screen and protect views from the neighboring residential areas such that any negative visual impacts will be avoided.

INTENTIONALLY LEFT BLANK

Key Map

A) View from 516 Timber St. Backyard

B) View from 514 Tanoak St. Backyard

C) View from 16151 Oleander Ave. Backyard

D) View from Second Floor of North Apartment Building

E) View from 1669 Oleander Ave. Backyard

SOURCE: Boulder Associates 2020, 2021

DUDEK

FIGURE 6

View Simulations

Encompass Health Chula Vista

INTENTIONALLY LEFT BLANK

As described in Section I(a), the proposed project would comply with the General Plan goals regarding scenic resources. Thus, the proposed project would not include signs that may conflict with scenic resources.

The proposed project would comply with Section 12.32 of the CVMC regarding street tree plantings and removal. Any removal of street trees would be completed in accordance with Section 12.32.080 of the CVMC. Overall, the proposed project would not conflict with any zoning or regulations regarding scenic quality, and impacts would be less than significant.

d) Less-Than-Significant Impact. The proposed project is a rehabilitation hospital where outdoor lighting and safety lighting would be included. However, the surrounding land uses include residential, industrial, and commercial uses where outdoor night-lighting is already present. All lighting would comply with CVMC Section 19.62.120 regarding parking lot lighting and Section 19.66.100 for shielding to control glare and prevent light spillover onto adjacent areas (City of Chula Vista 2020). The proposed project would have less-than-significant impact on day or nighttime views related to light or glare.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURAL AND FORESTRY RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring	☐	☐	☐	☒

Program of the California Resources Agency, to non-agricultural use?				
b) 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)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Agriculture and Forestry Comments:

a) No Impact. As indicated on the map of San Diego County Important Farmland developed by the California Department of Conservation for the Farmland Mapping and Monitoring Program, the project site is located on and surrounded by "Urban Built-Up Land" (DOC 2016). Urban and Built-Up Land generally includes land uses such as residential, commercial, industrial, institutional facilities, and other urban land uses. As such, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

b) No Impact. According to the Department of Conservation's map of San Diego County Williamson Act lands, the project site is not located on Williamson Act contract land (City of Chula Vista 2005). The project site is zoned Limited Industrial (ILP). Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c) No Impact. The project site and its immediate surroundings are within the Limited Industrial zone (ILP). The project site is not currently designated or used for forestry resources. Therefore, the proposed project would not conflict with existing zoning for forest land or timberland, and no impact would occur.

d) No Impact. The project site and its immediate surroundings are within the Limited Industrial zone (ILP). The project site is not currently designated or used for forestry resources. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.

e) No Impact. The project site and its immediate surroundings are within the Limited Industrial zone (ILP). The proposed project would not result in the conversion of agricultural or forest land. None of the surrounding lands in the vicinity of the project site are used for agriculture or are forest lands. Therefore, the proposed project would not result in the direct or indirect conversion of agricultural uses or forest land, and no impact would occur.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 applicable air quality plan?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air Quality Comments:

An Air Quality and Greenhouse Gas Emissions Analysis Technical Report (AQ/GHG Technical Report) prepared by Dudek for the proposed project (Appendix A). The analysis contained in this section is based on the findings of the AQ/GHG Technical Report.

a) Less-Than-Significant Impact. The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB), specifically the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP).

The SIP and RAQS rely on information from California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County as a whole and the cities in the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS

and may contribute to a potentially significant cumulative impact on air quality. The City's General Plan, Land Use Element designates the project site as Limited Industrial (LI), which is intended for light manufacturing, warehousing, certain public utilities, auto repair, auto salvage yards, and flexible-use projects that combine these uses with associated office space (City of Chula Vista 2017a).

The proposed inpatient rehabilitation center is an Unclassified Use pursuant to Section 19.54.020 (h) of the CVMC. As such, the proposed project would be permitted in this zone subject to approval of a Conditional Use Permit approved by the Planning Commission. The proposed project would result in an increase of 210 employees. The SANDAG Series 13: 2050 Regional Growth Forecast estimates the employment in the City would grow from 64,035 in 2010 to 114,435 in 2050 (SANDAG 2017). As such, the addition of 210 new employees associated with the proposed project would be minimal; and would not exceed the growth projections for 2050. The proposed project is an inpatient rehabilitation center and would not directly or indirectly induce population growth as it does not propose new homes. Therefore, the proposed project would not stimulate population growth or a population concentration or employment above what is assumed in local and regional land use plans, or projections made by regional planning authorities. Thus, impacts would be considered. Thus, impacts would be considered less than significant.

b) Less-Than-Significant Impact. Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and volatile organic compounds (VOCs) off-gassing) and off-site sources (worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Implementation of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, and asphalt pavement application. The proposed project would be subject to SDAPCD Rule 55, Fugitive Dust Control, which requires that the project take steps to restrict visible emissions of fugitive dust beyond the property line (PDF-AQ-1). To account for dust control measures in the calculations, it was assumed that the active sites would be watered at least three times daily, resulting in an approximately 61% reduction of particulate matter. As a surrogate for watering unpaved road three times per day, the "soil stabilizer for unpaved" option was used assuming an 84% reduction in PM_{10} and $PM_{2.5}$. Also, it was assumed that the project would limit vehicle travel on unpaved roads to 15 miles per hour.

Exhaust from internal combustion engines used by construction equipment and worker vehicles would result in emissions of VOC, oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter 10 (PM_{10}), and particulate matter 2.5 ($PM_{2.5}$). The application of asphalt pavement and architectural coatings would also produce VOC emissions, but low or no-VOC coatings are assumed (PDF-AQ-2). Table 2 shows the estimated maximum daily construction emissions associated with construction of the proposed project without mitigation. Complete details of the emissions calculations are provided in AQ/GHG Technical Report (Appendix A).

Table 2
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2020	4.38	82.82	36.38	0.20	7.79	4.38
2021	11.98	19.19	18.37	0.04	1.50	1.05
2022	33.55	7.69	8.45	0.02	1.13	0.43
Maximum Daily Emissions	**33.35**	**82.82**	**36.38**	**0.20**	**7.79**	**4.38**
Chula Vista Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from California Emissions Estimator Model. Although not considered mitigation, these emissions reflect California Emissions Estimator Model "mitigated" output, which accounts for the required compliance with SDAPCD Rule 55 (Fugitive Dust) and Rule 67.0.1 (Architectural Coatings).

As shown in Table 2, daily construction emissions would not exceed the City's significance thresholds. Therefore, impacts during construction would be **less than significant**.

Operation of the proposed project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, and landscape maintenance equipment; and energy sources. Table 3 presents the maximum daily area, energy, and mobile source emissions associated with operation (Year 2023) of the proposed project.

Table 3
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Area	2.08	<0.01	0.02	0.00	<0.01	<0.01
Energy	0.09	0.85	0.71	0.01	0.06	0.06
Mobile	0.70	2.60	7.92	0.03	2.58	0.71

Table 3
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Stationary	1.37	5.24	0.40	0.01	0.12	0.12
Total	**4.25**	**8.69**	**9.06**	**0.04**	**2.77**	**0.89**
Chula Vista Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; <0.01 = emissions reported are less than 0.01.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from California Emissions Estimator Model. These emissions reflect California Emissions Estimator Model "mitigated" output, which accounts for compliance with Rule 67.0.1 (Architectural Coatings).

As shown in Table 3, the combined daily area, energy, and mobile source emissions would not exceed the City's operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the SIP and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and the County as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As stated under Section III(a), the proposed project would be consistent with the existing zoning and land use designation for the site. As a result, the proposed project would not result in a cumulatively considerable contribution to regional O_3 concentrations or other criteria pollutant emissions. Impacts associated with project-generated operational criteria air pollutant emissions would be less than significant.

c) Less-Than-Significant Impact. Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed "sensitive receptors" are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by

CARB, include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. As such, sensitive receptors include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health-care facilities, rehabilitation centers, convalescent centers, and retirement homes. The closest sensitive receptors to the proposed project are residences adjacent to the western and northern property boundaries. The proposed project would also introduce new on-site sensitive receptors to the area.

Health Impacts of Toxic Air Contaminants

Duration of proposed construction activities (approximately 18 months) would only constitute a small percentage of the total long-term exposure period and would not result in exposure of proximate sensitive receptors to substantial toxic air contaminants (TACs). The heavy-duty construction equipment is subject to a CARB Airborne Toxic Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions, and diesel trucks are subject to a CARB Airborne Toxic Control Measure that limits idling of equipment and trucks during loading and unloading to 5 minutes and requires that electric auxiliary power units be used whenever possible. Also, construction equipment is subject to the CARB In-Use Off-Road Diesel Regulation that requires specific fleet average requirements be met for particulate matter emissions and to apply Best Available Control Technology requirements. As required by Policy E 6.10 in the City's General Plan Environmental Element (City of Chula Vista 2017a), the siting of new sensitive receivers within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment (HRA) as part of the CEQA review of the project. The project site is located approximately 1,100 feet from the I-805 and, thus, the proposed project would not be subject to the requirement. The proposed project would operate an emergency diesel generator, and the generator would be located 200 feet from the nearest sensitive receptor. The generator would operate 50 hours per year for testing, which would be a much shorter duration than the 30-year, continuously exposed, exposure duration. Furthermore, the emergency generator would be subject to SDACPD rules and permitting requirements, which would include compliance with SDAPCD's Best Available Control Technology requirements. The predominant wind direction is towards the east; thus, wind typically blows away from the residential receptors to the north and west of the project site. Therefore, the exposure of sensitive receptors to TAC emissions would result in a **less-than-significant** impact.

Health Impacts of Carbon Monoxide

Mobile-source impacts occur on two basic scales of motion. Regionally, project-related travel would add to regional trip generation and increase the vehicle miles traveled (VMT) within the local airshed and the SDAB. Locally, project traffic would be added to the City's roadway system. If such traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing.

The SDAB is a CO maintenance area (western and central part of the SDAB only). As a screening analysis, the South Coast Air Quality Management District conducted CO modeling for the 2003 Air Quality Management Plan (AQMP; Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003) for the four worst-case intersections in the SDAB. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic (ADT) volume of about 100,000 vehicles per day. Based on the AQMP analysis (SCAQMD 2003), CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO California Ambient Air Quality Standards (CAAQS) unless projected daily traffic would be more than 100,000 vehicles per day. Refer to Appendix A for details regarding AQMP analysis. Because the proposed project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day (Appendix A), a CO hotspot is not anticipated to occur, and associated impacts would be **less than significant.**

Health Impacts of Other Criteria Air Pollutants

Construction and operation of the proposed project would not result in emissions that exceed the City's emission thresholds for any criteria air pollutants. Volatile Organic Compounds and NO_x are precursors to ozone (O_3), for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by the EPA as an attainment area for the 1-hour O_3 NAAQS standard and 1997 8-hour NAAQS standard). The health effects associated with O_3 are generally associated with reduced lung function.

The VOC and NO_x emissions would minimally contribute to regional O_3 concentrations and its associated health effects. In addition to O_3, NO_x emissions would not contribute to potential exceedances of the NAAQS and CAAQS for NO_2. The existing nitrogen dioxide (NO_2) concentrations in the area are well below the NAAQS and CAAQS standards. Thus, it is not expected that the proposed project's operational NO_x emissions would result in exceedances of the NO_2 standards or contribute to the associated health effects. CO tends to be a localized impact associated with congested intersections. The associated CO "hotspots" were discussed previously as a less-than-significant impact. Thus, the proposed project's CO emissions would not contribute to significant health effects associated with this pollutant. PM_{10} and $PM_{2.5}$ would not contribute to potential exceedances of the NAAQS and CAAQS for particulate matter, would not obstruct the SDAB from coming into attainment for these pollutants, and would not contribute to significant health effects associated with particulates. Based on the preceding considerations, health impacts associated with criteria air pollutants would be considered **less than significant**.

Valley Fever Exposure

Valley Fever is not highly endemic to San Diego County, and within San Diego County, the incidence rate in the vicinity of the proposed project is below the statewide average. Construction of the proposed project would comply with SDAPCD Rule 55, which limits the amount of fugitive dust generated during construction. Strategies the proposed project would implement to comply with SDAPCD Rule 55 and control dust include watering three times per day, using magnesium chloride for dust suppression on unpaved roads, and limiting speed on unpaved roads to 15 miles per hour.

Based on the low incidence rate of Coccidioidomycosis in San Diego County, and the project's implementation of dust control strategies, it is not anticipated that earth-moving activities during project construction would result in exposure of nearby sensitive receptors to Valley Fever. Therefore, the proposed project would have a less-than-significant impact with respect to Valley Fever exposure for sensitive receptors.

d) Less-Than-Significant Impact. Odors are the form of air pollution that is most obvious to the general public and can present problems for both the source and surrounding community. The occurrence and severity of potential odor impacts depends on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the proposed project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be **less than significant**.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The proposed project does not include any of the land uses typically associated with odor complaints. The emergency diesel generator, which would operate 50 hours per year for testing purposes, would be located 200 feet from the nearest sensitive receptor, and would be subject to SDACPD rules and permitting requirements, which would include compliance with SDAPCD's Best Available Control Technology requirements. Therefore, project operations would result in an odor impact that would be **less than significant**

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Biological Resources Comments:

A Biological Letter Report (BLR) was prepared for the proposed project by Dudek (Appendix B). The analysis contained in this section is based on the findings of the BLR**.**

a) Less-Than-Significant Impact with Mitigation Incorporated.

Direct Impacts

The project site and off-site impact area (project study area) contains two vegetation communities and two land covers, which include coastal sage scrub, disturbed coastal sage scrub, disturbed habitat, and urban/developed land. Disturbed/developed/eucalyptus woodland habitat covers9.87 acres, and Diegan coastal sage scrub covers 0.14 acres within the project study area. The City is covered by the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (City of Chula Vista 2003), which provides guidance on biological resource preservation within the City. Per the MSCP, disturbed/developed/eucalyptus woodland habitats are considered Tier IV (other uplands) habitats and are not considered sensitive. Coastal sage scrub is a Tier II vegetation community per the City of Chula Vista MSCP Subarea Plan (Subarea Plan) and, therefore, is considered a sensitive habitat. The proposed project would result in direct impacts to coastal sage scrub, totaling 0.05 acres for phase 1 and an additional 0.01 acres for phase 2. Impacts to coastal sage scrub (would be potentially significant. Implementation of Mitigation Measure **MM-BIO-1** would reduce this impact to a less-than-significant level.

No special-status plants were detected in the project study area during the 2018 or 2020 site surveys. There are no special-status plant species with a moderate or high potential to occur within the project study area and, due to the extent of vegetative disturbance and lack of suitable substrate, special-status plant species are not expected to occur. Therefore, no significant direct impacts to special-status plants are anticipated. Urban/developed lands and disturbed habitat provide little native habitat value and foraging opportunities for wildlife and impacts to these vegetation communities/land covers would be less than significant.

No special-status wildlife species were detected during the 2018 or 2020 field surveys, including the focused survey for burrowing owl and burrowing owl habitat assessments, and potentials are low for special-status species to occur in the study area due to the disturbed nature of the site and the location being surrounded by urban development. Due to the known presence of burrowing owl in the surrounding area and the open and disturbed nature of the site, there is a potential for the species to occupy the site prior to construction. If

burrowing owl were to occupy the site before construction, the project would result in a potentially significant impact to burrowing owl. To mitigate for this impact, pre-construction burrowing owl surveys would be conducted as detailed in **MM-BIO-2**.

All raptors species are considered special-status and may use the site for foraging. Stands of small ornamental trees are present within the project study area and a red-shouldered hawk was seen soaring over the site; however, no nests were observed. Although raptor species have the potential to occur in the study area, lands within the impact footprint are primarily disturbed and do not provide suitable nesting habitat that would substantially affect any species from continuing to exist within the area. Direct impacts to special-status wildlife species would be less than significant.

Indirect Impacts

Two native vegetation communities were mapped within the project study area – coastal sage scrub and disturbed coastal sage scrub. Short-term indirect impacts that may affect adjacent vegetation communities include dust, invasive plant species, and increased human presence. Typical construction Best Management Practices (BMPs) will limit the spread of dust, and the project landscape plan would not include invasive species. Increased human presence is a potential short-term indirect impact. During construction, typical BMPs, such as having trash containers on site, a demarcated limit of work, and contractor education, will limit the potential for trash and other human disturbance. The proposed project would incorporate methods to control runoff, including a Stormwater Pollution Prevention Plan (SWPPP) to meet National Pollution Discharge Elimination System (NPDES) regulations.

The only potential long-term indirect impact is the change in stormwater discharge hydrology downstream of the proposed project. It is assumed that the proposed project would be designed in accordance with NPDES regulations and as such, impacts would be less than significant.

Most of the indirect impacts to vegetation communities previously described can also affect special-status wildlife. Wildlife may also be indirectly affected in the short-term by construction-related noise, which can disrupt normal activities and subject wildlife to higher predation risks. Adverse edge effects can cause degradation of habitat quality through the invasion of pest species. Breeding birds can be significantly affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities.

The project study area supports suitable vegetation for bird nesting, including trees associated with the street and property landscaping, and coastal sage scrub vegetation mapped on site.

This is nesting habitat for raptors and songbirds protected by the California Fish and Game Code Sections 3503 and 3503.5. Indirect impacts from construction-related noise may occur to breeding wildlife if construction occurs during the breeding season (i.e., February 1 through September 15). Wildlife that would be significantly affected by noise, based on suitable habitat in the vicinity of the proposed project. Species whose breeding/nesting may be significantly impacted by noise include all raptor species. This impact would be considered a significant impact, and mitigation would be required **(MM-BIO-3).**

Impacts related to adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service would be less than significant with mitigation incorporated. MM-BIO-3 would include pre-construction nesting bird surveys if construction is to initiate during the bird breading season and, if needed, nest avoidance measures to ensure compliance with the California Fish and Game Code Sections 3503 and 3503.5.

b) Less Than Significant with Mitigation Incorporated. As outlined above, impacts to coastal sage scrub and disturbed coastal sage scrub, totaling 0.05 acres for phase 1 and an additional 0.01 acres for phase 2, would be considered significant and mitigation would be required, according to the requirements and ratios in the Habitat Loss Incidental Ordinance (HLIT) ordinance (**MM-BIO-1**). Implementation of **MM-BIO-1** would reduce these impacts to a level below significance. Impacts to riparian habitat or other sensitive natural communities would be less than significant with mitigation incorporated.

c) No Impact. No jurisdictional resources were identified within the project study area; therefore, no direct or indirect impacts to waters of the United States, including wetlands, would occur.

d) Less-Than-Significant Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. The project site is surrounded by existing development and has no connectivity to habitat areas that would be considered a wildlife corridor. The nearest designated wildlife corridor is the Otay River Valley, located approximately 0.25 miles south of the project site, and is separated from the Otay River Valley by existing commercial development and public infrastructure, including roadways. Furthermore, given the urbanized residential and industrial uses surrounding the site, the site is unlikely to serve as a wildlife corridor. Therefore, impacts to wildlife corridors would be less than significant.

e) Less-Than-Significant Impact. The project site is located within the Development Areas Outside of Covered Projects as described in the City of Chula Vista MSCP Subarea Plan and is therefore governed by the HLIT. The proposed project would be mitigating habitat loss per the HLIT ratios and therefore would be in compliance. As the proposed project meets the goals of the MSCP Subarea Plan the proposed project would be consistent with the goals of the City of Chula Vista General Plan.

Additionally, the City's Tree Preservation Ordinance (Policy Number 576-05) only establishes policies for the preservation of City street trees. Implementation of the proposed project would not affect the removal of any trees considered street trees within the City, and, therefore, would not conflict with a tree preservation policy or ordinance. Implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources, and impacts are determined to be less than significant.

f) Less Than Significant with Mitigation Incorporated. As described above, the project site is located within the Development Areas Outside of Covered Projects as described in the City of Chula Vista MSCP Subarea Plan. The proposed project design is consistent with the Subarea Plan through specific adherence to mitigation/conveyance requirements for Development Projects Outside of Covered Projects and the HLIT ordinance as defined in the Subarea Plan. The project site has not been identified as a strategic preserve area within the City nor is it located within a designated conservation area; therefore, the proposed project would not impact the goals and objectives of the Subarea Plan.

However, the proposed project would impact coastal sage scrub and disturbed coastal sage scrub (Tier II), totaling 0.05 acres for phase 1 and an additional 0.01 acres for phase 2. While not currently present based on recent surveys, burrowing owl has the potential to occupy the site prior to the initiation of construction. In addition, the proposed project would have the potential to affect nesting birds that are protected by the MSCP Subarea Plan, resulting in a potentially significant impact. Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would reduce potential impacts to a level below significant.

Mitigation: The following mitigation measures are required to reduce impacts to less than significant:

MM-BIO-1 **Compensatory Uplands Mitigation:** Prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits, the project applicant shall mitigate direct impacts to 0.06 acre of coastal sage scrub habitat pursuant to the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (Subarea Plan) and Habitat Loss Incidental Take (HLIT)

Ordinance. Per the HLIT ordinance, impacts to coastal sage scrub shall be mitigated at the ratios identified in the MSCP Subarea Plan Table 5-3. Considering the project site is located outside of the preserve, coastal sage scrub mitigation provided in the Preserve shall be at a 1:1 ratio and coastal sage scrub mitigation provided outside of the Preserve shall be at a 1:1.5 ratio. Mitigation shall be provided through one or a combination of the following options:

Mitigation Bank. The applicant shall secure mitigation credits within a City-approved Conservation Bank or other City-approved location offering mitigation credits. Mitigation credits shall be for habitat of equivalent or higher habitat value than coastal sage scrub, with value determined consistent with the Subarea Plan tier system (see Subarea Plan Table 5-3). The San Diego County Water Authority's San Miguel Conservation Bank, located in Chula Vista, is a conservation bank with ample coastal sage scrub acre-credits that could be utilized upon City approval. The applicant is required to provide the City with verification of mitigation credit purchase prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits.

On-site Habitat Restoration. The project applicant shall provide 0.09 acre of on-site restoration of coastal sage scrub habitat and preservation of the restored habitat in perpetuity. Restoration will occur in an area of disturbed habitat adjacent to the impacted coastal sage scrub on the site. Given the limited size of the impacts to coastal sage scrub from the project and the urban setting of the site, restoration of disturbed habitat will be sufficient to ensure no net loss of coastal sage scrub habitat on the site. The restoration shall achieve 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The on-site habitat restoration mitigation site shall be preserved through (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) the designation of a permanent responsible party, and (3) be managed in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan can be a memorandum or letter report, but at minimum shall include the following: an implementation plan (possessing a plant palette with appropriate coastal sage scrub plant species), established performance criteria outlining native/non-native cover goals, container plant survival rate goals, maintenance and monitoring (to be performed by a qualified restoration technician), and additional measures as needed to meet the

performance criteria of maintaining 60 percent native plant cover. Prior to grading permit issuance, the project applicant shall provide proof that funds required to implement the restoration according to the Habitat Management Plan have been provided to the permanent responsible party.

On-site Habitat Preservation and Restoration. The project applicant shall provide on-site preservation of the remaining coastal sage scrub habitat not impacted by the project in addition to an adjoining area of restored habitat as described in the previous mitigation option; the combination of these areas would need to be 0.09 acre or more. Currently, the coastal sage scrub on the site possesses less than 60% of native coastal sage scrub species. This measure would ensure the enhancement of the both the preserved and restored areas with the goal of achieving 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The combination of on-site habitat preservation and restoration shall be ensured through: (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) a permanent responsible party clearly designated, and (3) management in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan shall be the same as is described in the previous mitigation option and will be intended to maintain 60 percent cover by native plants characteristic of coastal sage scrub habitat within the restored and preserved area. Prior to grading permit issuance, the project applicant shall provide proof that such funds have been provided to the permanent responsible party.

MM-BIO-2 Prior to issuance of any land development permits (including clearing, grubbing, and grading permits), the project applicant shall retain a qualified biologist to conduct focused pre-construction surveys for burrowing owls. The qualified biologist shall have a B.S. in biology or related field, and two years of field work experience in California. The surveys shall be performed no earlier than 30 days prior to the commencement of any clearing, grubbing, or grading activities. If burrowing owls are observed, the qualified biologist shall work with the City to determine if the owls are migratory or if the owls are occupying burrows. If occupied burrows are detected, the qualified biologist shall prepare a passive relocation mitigation plan subject to the review and approval by the Wildlife agencies and City, including any subsequent burrowing owl relocation plans to avoid impacts from construction-related activities. The plan shall be prepared

according to the performance measures set forth in the Staff Report on Burrowing Owl Mitigation prepared by the State of California Natural Resource Agency Department of Fish and Game dated March 7, 2012.

MM-BIO-3 **Avoidance of Nesting Bird Impacts:** Prior to the issuance of a grading permit, to avoid any direct or indirect impacts any species identified as a candidate, sensitive, or special status species in the HLIT, MSCP Subregional Plan, or other local or regional plans, policies or regulations, or by the CDFW or USFWS, removal of habitat that supports active nests in the project study area should occur outside of the breeding season of these species (February 1 to September 15), where feasible. If removal of habitat must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted no more than 72 hours prior to the start of construction activities (including removal of vegetation). If nesting birds are detected, a letter report or mitigation plan in conformance with the HLIT and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, and construction barriers/buffers) shall be prepared by a qualified biologist and include proposed measures to be implemented to ensure that take of birds or eggs is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City, and shall be required to be displayed on the grading plans for the proposed project.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Cultural Resources Comments:

A Negative Cultural Resources Report was prepared for the proposed project by Dudek (Appendix C). The analysis contained in this section is based on the findings of the report.

a) No Impact. The project site is currently vacant, as no structures are currently present within the project site. Additionally, Dudek searched archival topographic maps and historic aerial images of the project area and determined that the project site has never been historically occupied or developed residentially or commercially. Between 1981 and 1989, some surface disturbance, including grading in the north half occurred, but does not appear to have been substantial. No impact to historical structures would occur.

b) Less Than Significant with Mitigation Incorporated. As part of the Cultural Resources Report, a records search of the project site and a 1-mile buffer around the proposed project area was conducted by Dudek Staff at the South Coast Information Center (SCIC). These records indicate that no archeological resources have been identified or recorded within the proposed project's Area of Potential Effect (APE). A total of 37 previously recorded resources were identified within the surrounding 1-mile search buffer however none were discovered within the APE. These resources include 20 prehistoric artifact scatters, one habitation site, 12 prehistoric lithic isolates, three historic buildings, and one multicomponent site (which includes both a historic winery and a prehistoric artifact scatter). A field survey was also conducted by Dudek, on March 8, 2019, and again on March 9, 2020, to cover the additional 0.22 acres associated with the utility connection and drainage modification area. No prehistoric or historic cultural resources were identified during the pedestrian field survey of the project's APE.

The SCIC records indicate that no archaeological resources have been previously recorded within the project APE. Additionally, the field survey of the project APE was negative for archaeological resources. However, due to the numerous archaeological sites in vicinity of the proposed project, and the relatively limited amount of past disturbance within the project site, there exists the potential to encounter previously undisturbed or unknown

archaeological resources within the project site during earthwork and grading activities, which could result in a significant impact to archeological resources.

With implementation of **MM-CUL-1**, potential significant impacts to archaeological resources would be less than significant with mitigation incorporated.

c) Less-Than-Significant Impact. The project site is not currently used as a cemetery and is not otherwise known to contain human remains. However, it is possible that human remains may be found during project excavation and grading activities. Should any human remains be encountered during ground-disturbing activities, the proposed project would comply with the California Health and Safety Code, Section 7050.5. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the remains are determined to be Native American, the Coroner shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descended (MLD) from the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with existing regulations for proper protocol of inadvertent discovery of human remains would ensure that impacts would be less than significant.

Mitigation:

MM-CUL-1 Prior to the issuance of any demolition or grading permit, the Project Applicant shall demonstrate to the satisfaction of the City Development Services Department that a program related to potential archaeological resources uncovered during construction activities on-site has been established. The program shall include that:

1. The Project Applicant shall retain a qualified professional Archaeologist and Native American Monitor approved by the City to be present and monitor all ground-disturbing activities in native, undisturbed soils. The Archaeologist shall meet the Secretary of the Interior's Professional Qualification Standards to assess the potential significance of the discovery and propose appropriate mitigation per the California Environmental Quality Act (CEQA) or Section 106 of the National

Historic Preservation Act. The Native American Monitor shall be affiliated with a Native American tribe recognized to have a historic use of the area.

2. The Archaeologist shall halt work within 200-feet of the discovery in the event that archaeological resources are identified until the Archaeologist has evaluated the find and determine if the resource is a unique cultural resource as defined in Section 21083.2 (g) of the CEQA statutes, or if the resource qualifies as a significant tribal resource as determined in consultation with the Tribal monitor and as defined in Public Resources Code Section 21074.

3. If the resources is determined to be significant, the City shall be notified in writing by the Archaeologist and either (1) avoidance of the resource shall be completed or (2) recovery shall be completed prior to commencement of work within 200 feet.

4. If recovery is to be completed, the resource shall be recovered by the qualified archaeologist and, if applicable, in consultation with the Native American monitor.

5. Within 30 days of the completion of the recovery, a report shall be provided to the City, San Diego State University, and appropriate Native American Representatives. The report shall document the resource discovered in accordance with the Instructions for Recording Historical Resources (Office of Historic Preservation 1995) to preserve the information provided by the resource.

6. Within 60 days of recovery, the resource shall be submitted for curation to the San Diego Natural History Museum at the expense of the applicant or, as applicable, appropriated to the Native American tribe recognized to have a historic use of the area.

MM CUL-2: Prior to the issuance of any demolition or grading permit, the Project Applicant shall demonstrate to the satisfaction of the City Development Services Department that a program related to any human remains that might be encountered during ground-disturbing activities on-site has been established, the program shall include:

1. The Project Applicant shall halt work in the immediate area of the find;

2. The Project Applicant shall contact the San Diego County Coroner, City Development Services Department, and Sherriff's Department;

3. The Project Applicant shall be responsible for ensuring that the Native American Heritage Commission (NAHC) and the appropriate Native American representatives are contacted and that the NAHC contacts the most appropriate most likely descendant (MLD) as maybe directed by either the San Diego County Coroner, City Development Services Department, or Sherriff's Department;

4. The City Development Services Department shall direct the treatment of the remains pursuant to Coroner and MLD recommendations.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Energy Comments:

a) Less-Than-Significant Impact. The project proposes development of a 76,000-square-foot rehabilitation facility. The proposed project would consume energy both during proposed project construction and operation.

During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. However, the energy consumed during construction would be temporary, and would not represent a significant demand on available resources. There are no unusual project characteristics that would necessitate the use of construction equipment or methods that would be less energy-efficient or that would be wasteful.

During operation, the proposed project facilities would consume energy related to building operation, exterior lighting, landscape irrigation and maintenance, and vehicle trips to and

from the use. In accordance with California Energy Code Title 24, the proposed project would be required to meet the Building Energy Efficiency Standards, thereby ensuring the proposed project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during proposed project construction or operation. Impacts would be less than significant.

b) Less-Than-Significant Impact. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs. Part 6 of Title 24 specifically establishes energy efficiency standards for residential and non-residential buildings constructed in the State of California in order to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen standards, which established mandatory minimum environmental performance standards for new construction projects. The proposed project would comply with Title 24, Part 6 and Part 11, per state regulations. Based on the foregoing, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the proposed project would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following analysis is based on the Updated Geotechnical/Geologic Investigation Report prepared by Partner (Appendix D) and the Paleontological Resources Inventory Report prepared by Dudek (Appendix E).

Geology and Soils Comments:

a) Less-Than-Significant Impact

i) Less-Than-Significant Impact. The project site is not located within an Alquist-Priolo earthquake fault zone. The most significant fault in the proximity of the site is the Rose Canyon Fault Zone, which is located approximately 6.7 miles west of the project site (Appendix D). Because of the lack of known active faults on the site, the potential for surface rupture at the site is considered low. Shallow ground rupture due to shaking from distant seismic events is not considered a significant hazard, although it is a possibility at any site (Appendix D). The seismic design of the proposed building at the subject site would be in accordance with the 2019 California Building Code (CBC) criteria and standard practices of the Association of Structural Engineers of

California. The proposed project would not expose people or structures to impacts related to rupture of a known earthquake fault. Impacts would be less than significant.

ii) Less-Than-Significant Impact. No active earthquake faults are identified as occurring on or directly adjacent to the project site, and the project site is not located within an Alquist-Priolo fault zone (Appendix D). Additionally, the site-specific report prepared concluded that possible ground shaking or acceleration on site would be similar to the Southern California region as a whole, and effects would be minimized through compliance with the CBC. Therefore, through adherence with CBC requirements, impacts resulting from seismic related ground shaking would be less than significant.

iii) Less-Than-Significant Impact. Soil liquefaction is a phenomenon in which saturated cohesionless soils undergo a temporary loss of strength during severe ground shaking and acquire a degree of mobility sufficient to permit ground deformation. In extreme cases, the soil particles can become suspended in groundwater, resulting in the soil deposit becoming mobile and fluid-like. Liquefaction is generally considered to occur primarily in loose to medium dense deposits of saturated soils. Thus, three conditions are required for liquefaction to occur: (1) a cohesionless soil of loose to medium density; (2) a saturated condition; and (3) rapid large strain, cyclic loading, normally provided by earthquake motions. The site is not located in a Seismic Hazard Zone for liquefaction (Seismic Hazards Mapping Act, State of California), as the site vicinity has not yet been mapped. As previously stated, all construction associated with the proposed project would comply with the CBC and with City building requirements. Thus, impacts associated with liquefaction would be less than significant.

iv) Less-Than-Significant Impact. During the site reconnaissance for the Updated Geotechnical / Geologic Investigation Report (Appendix D), no evidence of landslides or instability was found. In addition, the proposed project would be required to comply with standard CBC and IBC requirements and local grading standards that minimize geologic hazards, including seismic-related ground failure. The Updated Geotechnical / Geologic Investigation Report provides recommendations for measures in compliance with these building code requirements and local grading standards, such as excavation, spread foundation, mass grading, retaining walls, soil reuse, concrete, site stormwater considerations, and utilizing other standard methods of construction in compliance with applicable local, state, and federal building construction standards, as provided in Appendix

D. With incorporation of the recommendations, impacts associated with landslides or instability would be less than significant.

b) Less-Than-Significant Impact. Ground surfaces would be exposed during construction. Construction projects that involve the disturbance of one or more acres of soil are required to obtain coverage under the State Water Resources Control Board General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit). The Construction General Permit requires the development and implementation of a SWPPP, which contains standard construction BMPs intended to prevent the off-site discharge of soil or construction materials in stormwater. With implementation of the SWPPP, the potential for substantial soil erosion or the loss of topsoil is considered less than significant.

The proposed impervious areas include sidewalks, buildings, courtyard walkways, and surface parking. In order to mitigate the impervious area, the project proposes two modular wetland system structures that are projected to reduce the 50-year peak flow from 8.4 cubic feet per second (cfs) to 7.4 cfs. The structural and paved improvements would be impervious areas lacking any exposed soils. The landscape areas, although pervious, would contain various trees, shrubs, and groundcover that would help stabilize any surface soils and contain these soils on the project site. Therefore, the potential for substantial soil erosion or the loss of topsoil is considered less than significant.

c) Less-Than-Significant Impact. Refer to Sections VII(a)(iii) and VII(a)(iv). No active earthquake faults are identified as occurring on or directly adjacent to the project site. The most significant fault in the proximity of the site is the Rose Canyon Fault Zone, which is located approximately 6.7 miles west of the project site. Additionally, the site is not located in a Seismic Hazard Zone for liquefaction (Seismic Hazards Mapping Act, State of California), as the site vicinity has not yet been mapped. As previously stated, all construction associated with the proposed project would comply with the CBC and with City building requirements. Impacts would be less than significant.

d) Less-Than-Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrinking or swelling) due to variations in moisture content¸ the magnitude of which is related to both clay content and plasticity index. According to the Updated Geotechnical/Geologic Investigation Report (Appendix D), the geologic units encountered at this site include undocumented fills. These deposits typically consist of medium dense, moist, silty sands, clayey sands, and sandy clays. The natural soils include San Diego Formation, which is made up of silty sandstone, fine, silty

sand/sandy silt, moist, slightly micaceous, medium dense, moderately weathered, early Pleistocene to late Plicocene. Slab-on-grade areas should be supported on non-expansive engineered fill extending to competent native soils that are approved by the engineer. Therefore, with adherence to the CBC, and the associated Report of Geotechnical Investigation (Appendix D) recommendations, the potential for impacts associated with expansive soils would be less than significant.

e) No Impact. Implementation of the proposed project would not result in the need for a septic tank or alternative wastewater disposal system. No impact would result.

f) Less Than Significant with Mitigation Incorporated. According to the Paleontological Resources Inventory Report (Appendix E) prepared for the proposed project, the project site is underlain by late Pliocene to early Pleistocene (~ 3.6 mya to 1.8 mya) San Diego Formation (map unit Tsdss), early to middle Pleistocene (~2.58 mya to 781,000 years ago) very old undivided paralic deposits (=Lindavista Formation) (map unit Qvop), and middle to late Pleistocene (~781,000 to 11,700 years ago) old alluvial floodplain deposits (map unit Qoa). The record search results conducted by the San Diego Natural History Museum (SDNHM) were received on March 13, 2019, and no records were found of fossil localities within the boundaries of the project site. However, 15 fossil localities are located within a 1-mile radius of the study area. Of these, three localities are from geological units not present within the project site; 11 fossil localities are from the San Diego Formation; and one locality is from the Lindavista Formation.

San Diego Formation (Tsdss)

The late Pliocene to early Pleistocene, marine San Diego Formation is mapped in the northwestern portion of the project site and consists of fossiliferous yellowish-gray to yellowish-brown, weakly consolidated, fine-grained sandstones, poorly sorted gravels, pebble conglomerates, and bedded claystones (Kennedy 1975; Deméré and Walsh 1993). The San Diego Formation is abundantly fossiliferous and has produced significant marine and terrestrial fossils throughout its extent in San Diego County. Jefferson (2003) reported a variety of birds and small and large terrestrial mammals in his compilation of early late Pliocene to early Pleistocene fossil localities. The SDNHM reported 11 fossil localities within the 1-mile radius buffer zone for the project site. These localities yielded fossil burrows, leaf and seed pod impressions and remains, brachiopods, gastropods, bivalves, tusk shells, sand dollars, barnacles, crabs, sharks, rays, sea birds, toothed whales, baleen whales, walruses, rabbits, and horses (Table 2). Based on the productivity of the San Diego Formation, it is assigned high paleontological sensitivity (Confidential Appendix A).

Very Old Paralic Deposits (Qvop) = Lindavista Formation

The early to middle Pleistocene Lindavista Formation is mapped in the northeastern corner of the project site and is a fossiliferous, nearshore marine and partly terrestrial (deltaic) geological unit that consists of interfingering cobble-rich conglomerates and sandstones that are oxidized to a reddish brown color (Kennedy 1973; Kennedy 1975). The formation has yielded scientifically significant marine invertebrate and vertebrate specimens, including molluscs (gastropods and bivalves), Polychaeta worm burrows, echinoderms, and crustaceans (Kennedy 1973; Kennedy 1975). The SDNHM reported one Lindavista Formation fossil locality from within the 1-mile radius buffer zone of the project site that consisted of fossil steinkerns (internal molds) of pholad clams and burrows. This geological unit is assigned moderate paleontological sensitivity in the area of the project site (Table 2) (Confidential Appendix A).

Old Alluvial Floodplain Deposits (Qoa)

Pleistocene old alluvial floodplain deposits are mapped on the surface in the southern project site. These deposits consist of varying amounts of clays, sands, silts, and gravels that are usually moderately indurated and oxidized. Old alluvial floodplain deposits have produced significant paleontological resources in San Diego County. In his compilation of Quaternary (~2.58 mya – recent) vertebrates from California, Jefferson (1991a, 1991b) reported numerous fossil localities from old alluvial floodplain deposits in San Diego County that produced fossil amphibian, reptile, bird, and mammal specimens. The SDNHM reported no fossil localities from old alluvial floodplain deposits within the 1-mile radius buffer zone of the project site; however, they do have fossil localities from other areas of San Diego County that have yielded fossil reptiles, birds, small mammals, and Ice-Age megafauna (e.g., mammoth, bison, horse, and camel). This geological unit is assigned moderate paleontological sensitivity in the area of the project (Table 2) (Confidential Appendix A).The majority of the project site terrain consists of a modestly sloping hillside with a moderately dense cover of mixed-grass scrub brush communities and landscaped trees and vegetation. Much of the ground surface was obscured by vegetation when the original paleontological survey was conducted on March 08, 2019; however, there was much greater surface visibility during the supplemental survey on June 24, 2020. While surveying an exposed San Diego Formation outcrop in the northern portion of the project site on June 24, 2020, Dudek field paleontologist Jason Collins discovered a fragmentary fossil bryozoan weathering out on the surface. The outcrop dipped slightly to the southwest and was composed of fine-grained, silty sandstone.

The review of records search data, geological mapping, geological and paleontological literature did not identify any existing paleontological resources within the project site; however, a fragmentary crab fossil was documented during the supplemental survey from within San Diego Formation deposits. In addition, the paleontological records search conducted by the SDNHM revealed 12 localities within a 1-mile radius buffer zone of the project site boundary from the same geological units that underlie the project site. Based on the records search results, survey results, and map and literature review, the project site has moderate to high potential to produce paleontological resources during planned construction activities. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of these geologic units have the potential to disturb the paleontological resources preserved therein, resulting in a potentially significant impact. A paleontological resources impact mitigation program (PRIMP) is recommended for excavation within moderate to high sensitivity geological units (e.g., Lindavista Formation and San Diego Formation, respectively) and should be implemented in accordance with **MM-GEO-1**. Excavation within lower sensitivity units (e.g., Holocene age alluvial flood-plain deposits) does not require mitigation, as significant resources that would provide important paleontological information are not expected to be present in those deposits. Implementation of **MM-GEO-1** would reduce the potential for impacts to paleontological resources to less than significant.

Mitigation Measures: The following mitigation measures are required:

MM-GEO-1 Prior to the issuance of grading permits, the applicant shall provide written confirmation to the City that a qualified paleontologist has prepared a PRIMP and has been retained to carry out the PRIMP. A qualified paleontologist is defined as an individual with an MS or PhD in paleontology or geology who is familiar with paleontological procedures and techniques and has expertise in local geology, stratigraphy, and biostratigraphy. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP) (2010) and contain the following components:

- Introduction to the project, including project location, description grading activities with the potential to impact paleontological resources, and underlying geologic units.
- Description of the relevant laws, ordinances, regulations, and standards pertinent to the project and potential paleontological resources.
- Requirements for the qualified paleontologist to attend the pre-construction meeting and provide worker environmental awareness training at the pre-construction meeting as well as at the jobsite the day grading is to be initiated. In addition, the qualified paleontologist

shall inform the grading contractor and City Resident Engineer of the paleontological monitoring program methodologies.

- Identification of where paleontological monitoring of excavations impacting the San Diego Formation, very old paralic deposits (Lindavista Formation), and old alluvial floodplain deposits, is required within the project site based on construction plans and/or geotechnical reports.
- Procedures for adequate paleontological monitoring (including necessary monitoring equipment), methods for treating fossil discoveries, fossil recovery procedures, and sediment sampling for microvertebrate fossils, including the following requirements:
    - A paleontological monitor shall be on site at all times during the original cutting of previously undisturbed sediments of moderately to highly sensitive geologic units (e.g., San Diego Formation, very old paralic deposits, and old alluvial floodplain deposits) to inspect cuts for contained fossils. (A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.) The paleontological monitor shall work under the direction of a qualified paleontologist. Monitoring is not required during excavation within low resource sensitivity geological units (e.g., young alluvial flood-plain deposits) if determined to be present within the project site.
    - Paleontological monitoring is not required in areas underlain by artificial fill unless grading activities are anticipated to extend beneath the veneer of fill and impact underlying geological units with moderate to high paleontological sensitivity (e.g., San Diego Formation, very old paralic deposits [Lindavista Formation], and/or old alluvial floodplain deposits).
    - If fossils are discovered, the qualified paleontologist and/or paleontological monitor shall recover them. The paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading within 50 feet of the resource to allow recovery of fossil remains. Because of the potential for the recovery of small fossil remains, it may be necessary in certain instances, and at the discretion of the qualified paleontologist, to set up a screen-washing operation on the project site. Alternatively, sediment samples can be collected and processed off-site.
- Paleontological reporting, and collections management:
    - Prepared fossils along with copies of all pertinent field notes, photos, maps, and the final paleontological monitoring report discussed below shall be deposited in a scientific institution with paleontological collections such as the San Diego Natural History Museum within 90 days of completion of monitoring unless the City and the qualified paleontologist determine the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time. Any curation costs shall be paid for by the applicant.

- A final paleontological monitoring report shall be completed. This report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils, and shall be submitted to the designated scientific institution within 90 days of the completion of monitoring unless the City and the qualified paleontologist determine the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	☐	☐	☒	☐

Dudek prepared an Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the proposed project (Appendix A). The analysis contained in this section is based on the findings of the Air Quality and Greenhouse Gas Emissions Analysis.

Greenhouse Gas Comments:

a) Less-Than-Significant Impact.

Construction Emissions

Construction of the proposed project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. Table 4 shows the estimated annual GHG construction emissions associated with the proposed project, as well as the amortized construction emissions over a 30-year "project life."

Table 4
Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons			
2020	134.50	0.01	0.00	134.85
2021	369.81	0.07	0.00	371.63
2022	73.80	0.01	0.00	74.06
			Subtotal	*580.54*
			Vegetation Removal	*12.21*
			Total Emissions	*592.75*
			30-Year Amortized Emissions	**19.76**

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

Total construction-related GHG emissions for the proposed project were 593 MT CO_2e. Estimated 30-year amortized project-generated construction emissions would be approximately 20 MT CO_2e per year. However, because there is no separate GHG threshold for construction emissions alone, the evaluation of significance is discussed in the operational emissions analysis below.

Operational Emissions

Operation of the proposed project would generate GHG emissions through motor vehicle trips to and from the project site; landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the proposed project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. It is noted the project is assumed to include sustainable design features, as indicated in PDF-GHG-1 to PDF-GHG-4. The estimated operational (year 2023) project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and stationary sources are shown in Table 5.

Table 5
Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Area	<0.01	0.00	0.00	<0.01
Energy	399.02	0.01	0.01	400.85
Mobile	407.49	0.02	0.00	408.01
Solid waste	23.71	1.40	0.00	58.74
Water supply and wastewater	24.79	0.24	0.01	32.37
Stationary	0.07	<0.01	0.00	0.18

Table 5
Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Total				**900.15**
Amortized Construction Emissions				*19.76*
Operation + Amortized Construction Total				**919.91**

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; <0.01 = emissions reported are less than 0.01. These emissions reflect California Emissions Estimator Model "mitigated" output and operational year 2023.

As shown in Table 5, estimated annual project-generated GHG emissions in 2023 would be approximately 900 MT CO_2e per year as a result of project operations. Estimated annual project-generated emissions in 2023 from area, energy, mobile, solid waste, water/wastewater, and stationary sources and amortized project construction emissions would be approximately 920 MT CO_2e per year. The proposed project's GHG emissions would be less than the 3,000 MT CO_2e per year screening level threshold adopted as an interim threshold by the South Coast Air Quality Management District in 2008 for residential/commercial uses. This threshold is utilized to assess the significance of GHG emission impacts, since neither the State of California nor the SDAPCD has adopted emission-based thresholds of significance for GHG emissions under CEQA. Therefore, the proposed project would be considered to have a less-than-significant impact.

b) Less-Than-Significant Impact. This section discusses the proposed project's consistency with the City's CAP (City of Chula Vista 2017b), SANDAG's Regional Plan (SANDAG 2015a), and CARB's Scoping Plan (CARB 2017).

Consistency with the CAP

The City's CAP is not considered a qualified GHG reduction plan in accordance with CEQA Guidelines, Section 15183.5, as it has not been adopted in a public process following environmental review. Consistency analysis was performed with the City's CAP for the preparation of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report (Appendix A). However, the consistency analysis was performed for informational purposes only and would not be used to determine significance. The proposed project includes several design features that would help reduce its GHG emissions in line with the City's CAP. The proposed project would be consistent with the applicable measures within the City's CAP.

Consistency with SANDAG's San Diego Forward: The Regional Plan

Regarding consistency with SANDAG's Regional Plan, the proposed project would include site design elements and project design features developed to support the policy objectives of the RTP and SB 375. The proposed project would be located near MTS bus route 704 and the I-805. Additionally, the project site is close to major urban centers, and the proposed project would also be a source of employment. As further analyzed in the AQ/GHG Technical Report, the proposed project is consistent with all applicable Regional Plan Policy Objectives or Strategies. In conclusion, the proposed project is consistent with SB 375 and SANDAG's Regional Plan, and impacts would be less than significant.

Consistency with CARB's Scoping Plan

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., low-carbon fuel standard), among others.

The proposed project would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law. To the extent that these regulations are applicable to the proposed project, its inhabitants, or uses, the proposed project would comply with all applicable regulations adopted in furtherance of the Scoping Plan. In summary, the proposed project would be consistent with the measures and policy goals in the Scoping Plan. Therefore, the proposed project would be consistent with CARB's Scoping Plan. The proposed project would be below the SCAQMD 3,000 MT CO_2e per year screening level threshold for residential/commercial uses. Finally, the SDAPCD has not adopted GHG reduction measures that would apply to the GHG emissions associated with the proposed project. Therefore, this impact would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of 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 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No 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?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

The following analysis is based on the Phase 1 Environmental Assessment Report (ESA) (Appendix F) and the Phase 2 Subsurface Investigation Report (Appendix G) prepared by Partner Engineering and Science, Inc. in January 2018 and August 2018, respectively.

Hazards and Hazardous Materials Comments:

a) Less-Than-Significant Impact. A variety of hazardous substances and wastes would be stored, used, and generated during construction of the proposed project. These would include fuels for machinery and vehicles, new and used motor oils, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Adherence to the construction specifications and applicable federal, state, and local regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the proposed project would not create a significant hazard to the public or the environment. Impacts related to hazardous materials during construction would be less than significant.

The operational phase of the proposed project involves an inpatient rehabilitation hospital, which is a land use not typically considered hazardous to the public. However, as an acute care health facility, the use or disposal of hazardous medical materials may occur during the operation of the facility. The use and disposal of medical materials are fully regulated by the Environmental Protection Agency (EPA), State of California, San Diego County, and/or City of Chula Vista. With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the proposed project would be less than significant.

c) **Less-Than-Significant Impact.** As discussed in Section IX(a), a variety of hazardous substances and wastes typical to standard construction projects would be stored and used on the project site during construction of the proposed project. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment would be the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are included in construction specifications and required by regulations. Regulations include Occupational Safety and Health Act regulations and San Diego Regional Water Quality Control Board Order No. R9-2013-0001 (MS4 Permit), with associated SWPPP requirements. Compliance with standard regulations would ensure that hazard impacts would be less than significant.

The Phase I ESA prepared by Partner resulted in the identification of a recognized environmental condition (REC) within the project site. Based on subsurface investigations conducted at the east adjacent Brandywine Distribution Center sites, it appears that chlorinated hydrocarbons (TCE reported at concentrations of 1 micrograms per Liter [µg/L] to 720 µg/l) potentially originating from the up-gradient former Omar Rendering site and the Otay Landfill have impacted the groundwater at the east adjacent Brandywine Distribution Center sites, and the potential exists that chlorinated hydrocarbons originating from the former Omar Rendering site and the Otay Landfill have impacted the subsurface of the project site. Based on the aforementioned, the potential exists that chlorinated hydrocarbons originating from the former Omar Rendering site and the Otay Landfill have impacted the subsurface of the project site. The likely presence of subsurface contamination at the subject property is considered a REC.

Partner conducted a Phase II Subsurface Investigation at the subject property to evaluate the potential impact of VOCs to soil gas as a consequence of a release or releases from the former Omar Rendering Site to the east and former Otay Landfill to the northeast. The scope of the Phase II Subsurface Investigation included the advancement of 10 borings to facilitate the

collection of representative soil gas samples. Ten soil gas samples were analyzed for VOCs. Subsurface lithology encountered in the upper 5 feet below ground surface consisted of silty sand (SM). None of the detected concentrations of VOCs in the analyzed soil gas samples exceeded the calculated residential or commercial/industrial SGSLs. Based on the Subsurface Investigation, there does not appear to be a vapor intrusion concern to future occupants of the subject property as a result of the releases from the former Omar Rendering Site to the east and former Otay Landfill to the northeast. Based on the information included in the Phase II ESA, no further investigation of the site is warranted. Thus, the potential impact related to the release of hazardous materials into the environment would be less than significant.

c) No Impact. The project site is not located within 0.25 miles of an existing or proposed school. Valle Lindo Elementary School is located approximately 0.3 miles to the north. As such, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school, and no impact would occur.

d) No Impact. According to the Phase I ESA (Appendix F) prepared for the proposed project, the project site is not found on a list of hazardous materials sites as designated on a regulatory database. More specifically, the Phase I ESA states "The subject property is not identified in the regulatory database report." Since no registered site occur on the project site, no impact would occur related to a listed site.

e) Less-Than-Significant Impact. The closest airport to the project site is the Brown Field Municipal Airport, which is approximately 3 miles to the southeast. However, the project site is not located within the airport's overflight zone, safety zone, or within the noise compatibility map. Thus, the Brown Field Airport operations would not result in any significant impacts to the proposed project (San Diego County Regional Airport Authority 2010).

f) Less-Than-Significant Impact. The proposed project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. The proposed project would include emergency vehicle access to the project site along Shinohara Lane, and internal access designed in conjunction with the City to ensure adequate fire and emergency vehicle access. Construction of the proposed project is not anticipated to require the closure of roadways; the project site is located at the end of a dead-end road, and would therefore not impact any through streets or roadways that serve as evacuation routes As indicated in the City's General Plan, the nearest evacuation routes are Main Street and I-805, located just south and west of the project site respectively (City

of Chula Vista 2017a). Therefore, impacts to emergency response and/or evacuation plans would be less than significant.

g) Less-Than-Significant Impact. Areas in the City that are particularly susceptible to wildland fires, are designated as "very high hazard" areas as delineated on Figure 9.9 of the City's General Plan: Wildland Fire Hazard Map. Very High Hazard areas within the City are located south of the eastern portion of the Lower Otay Reservoir and south of Otay Lakes Road (City of Chula Vista 2017a). The project site is not located in or adjacent to an area designated as high or very high hazard area. Additionally, the project site is located within a highly urbanized area of Chula Vista, surrounded by existing residential and commercial development, and it is unlikely wildland fires would affect the project site. Therefore, impacts from wildland fires at the site due to the proposed project would be less than significant.

Mitigation: No mitigation measures are required:

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the 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;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based on the Preliminary Drainage Report (Appendix H) and the Priority Development (PDP) Stormwater Quality Management Plan (Appendix I) prepared by APD Consultants, Inc., respectively.

Hydrology and Water Quality Comments:

a) Less-Than-Significant Impact. The existing drainage patterns generally flows southeasterly to an existing low point located near the southeastern corner of the property at the terminus of Shinohara Lane. Within the project site, there are multiple concrete v-shaped gutter drainage channels that collect on- and off-site runoff and direct it towards the southeastern corner of the property. The collected runoff discharges to the south along an existing open concrete channel contained within an existing 10-foot wide public storm drain and sewer easement. The open concrete channel connects to the existing city storm drain system in Main Street, which outlets into the Otay River and ultimately into San Diego Bay.

The project proposes to direct existing and proposed drainage into two modular wetland system BMPs that discharge into a proposed 3-foot wide concrete ditch within existing 10-foot wide public storm drain and sewer easement leading to the storm drain system within Main Street. Construction projects that involve the disturbance of 1 or more acres of soil are required to obtain coverage under the State Water Resources Control Board Construction General Permit. Construction activity subject to this permit includes clearing, grading, and disturbances to ground surfaces, such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP would contain a site map that depicts the location of stockpiles, staging areas, and the type and location of BMPs such as silt fencing, sandbag berms, and general good housekeeping methods intended to prevent the off-site discharge of soil or construction materials in stormwater.

Additionally, a Stormwater Quality Management Plan (SWQMP) was prepared for the proposed project to address operational water quality (Appendix I). The purpose of the SWQMP is to ensure consistency with the Priority Development Project (PDP) requirements of the City of Chula Vista BMP Design Manual (City of Chula Vista 2019), which is based on the requirements of San Diego Regional Water Quality Control Board Order No. R9-2013-0001 (MS4 Permit). The proposed impervious areas include sidewalks, buildings, courtyard walkways, and surface parking. Per Appendix I, the pre-developed condition generates a 100-year peak flow of Q=9.6 cubic feet per second (cfs) and the post-developed condition would generate a 100-year peak flow of Q=32.6 cfs. In order to control runoff from the impervious area, the project proposes underground detention chambers and modular wetland system structures. With these measures, the project would match the existing 100-year peak flow. It is noted that hydromodification requirements do not apply, as the project discharges into concrete or lined storm drains. Refer to Appendix I for additional details.

Overall, with implementation of the SWQMP and SWPPP, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

b) Less-Than-Significant Impact. The proposed project site is located within the Otay Hydrologic Unit, within the Otay Valley Boundary. As stated in the Updated Geotechnical/Geologic Investigation Report (Appendix D), groundwater was not encountered during boring tests, and it is approximated at depths of 45 to 85 feet below grade. The proposed project would not involve permanent pumping of groundwater, as no development or operational phase of the proposed project would require the direct use of groundwater supplies. With site development, runoff is expected to be treated and detained in modular wetland systems before being discharged into the City drainage system (Appendix I). Impacts due to the proposed project would be less than significant.

c) Less-Than-Significant Impact.

i) Less-Than-Significant Impact. Construction of the proposed project requires the preparation and implementation of a SWPPP that would describe the methods used to minimize soil erosion on the site during construction, such as berms of gravel bags, and securing filter fabric on stock piles of construction materials with gravel bags or rocks. The methods used during construction would minimize erosion.

Once constructed, on-site peak flows would be collected through the on-site storm drain system and discharged into the City's storm drain infrastructure to the south. The project would implement BMPs in accordance with the SWQMP (Appendix I) to control runoff and prevent substantial erosion. Due the site's soil conditions and associated low infiltration, this includes minimizing impervious areas and directing flows into the storm drain system. The proposed project would generate a footprint of approximately 45% impervious area. In order to minimize runoff from the impervious area, the project proposes underground detention chambers and two modular wetland system structures. The structural and paved improvements would be impervious areas lacking any exposed soils. The landscape areas, although pervious, would contain various trees, shrubs, and groundcover that would help stabilize any surface soils and contain these soils on the project site.

Drainage would be controlled during construction and operations of the project consistent with the BMPs identified in the SWPPP and SWQMP. These documents were prepared consistent with applicable regulations that are intended to avoid significant erosion or siltation impacts. Thus, through implementation of the

proposed on-site stormwater system, and compliance with the SWQMP and SWPPP, the proposed project would not result in substantial erosion or siltation on or off site. Impacts would be less than significant.

ii) Less-Than-Significant Impact. With implementation of the proposed project, the flow patterns of the site would largely stay the same. The proposed project would implement underground storage chambers and modular wetland systems. All on-site storm runoff would flow through the modular wetland systems before the runoff is discharged off site into the city storm drain system. Based on the Preliminary Drainage Report (Appendix H) and SWQMP (Appendix I), drainage would be controlled in accordance with regulations, and the project would match the existing 100-year peak flow. In addition, a SWPPP would be required to be implemented to control flows during construction. As such, the proposed project would not substantially alter the existing drainage patterns such that it would increase flooding on or off site. Impacts would be less than significant.

iii) Less-Than-Significant Impact. A SWQMP was prepared for the proposed project, which specifies the BMPs that would be implemented during construction to minimize impacts to water quality. Further, the Drainage Study (Appendix H) that was prepared for the proposed project concluded that, during operation, the flow patterns of the site would largely stay the same with implementation of the proposed project. Although the proposed project would increase the amount of impervious surface at the site compared to existing conditions, this increase would be treated by the proposed stormwater design. This includes underground detention chambers and modular wetland systems would be implemented as part of the proposed project to ensure runoff from large storm events would not exceed the capacity of the stormwater drainage system. As such, impacts would be less than significant.

iv) Less-Than-Significant Impact. According to the FEMA Flood Insurance Rate Map (FIRM) for this site, the project site is located in an unshaded Zone X, which is defined as "Areas determined to be outside the 500-year floodplain (FEMA 2012a, 2012b). The site is not located within proximity to a water body that could pose a seiche hazard to the proposed project. Project impacts would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect flood flows and impacts would be less than significant

d) No Impact. As stated above, the project site is located in an unshaded Zone X, which is defined as "Areas determined to be outside the 500-year floodplain (FEMA 2012a, 2012b). The project site is located outside of a 100-year flood zone hazard. In addition, the project site is not located near a designated tsunami inundation zone, and is not located near a body of water, such as a lake, which could be subject to seiche. No impact would occur.

e) Less-Than-Significant Impact. The San Diego Bay Watershed Management Area Water Quality Improvement Plan was prepared to serve as a guide toward improving water quality per the Regional MS4 Permit (SDRWQCB 2016). A SWQMP has been prepared for the proposed project consistent with the requirements of the City's BMP Design Manual, consistent with the requirements of the San Diego Regional Water Quality Control Board (SDRWQCB) Order No. R9-2013-0001 (Regional MS4 Permit). The implementation of the requirements contained within the SWQMP prepared for the proposed project, including the water quality, drainage, and runoff management improvements contained therein (per the requirements of the Regional MS4 Permit), would ensure that the proposed project would not conflict of obstruct with the applicable Water Quality Improvement Plan.

Additionally, as described in Section X(b), the proposed project would not interfere with groundwater recharge or use, and thus would not conflict with an applicable groundwater management plan. Therefore, impacts would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING				
Would the project:				
a) Physically divide an 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?	☐	☐	☒	☐

Land Use and Planning Comments:

a) No Impact. The proposed project would involve the construction of an 80-bed inpatient rehabilitation center located on a currently undeveloped private property surrounded by an established community. It is noted that Timber Street public right-of-way and the City of Chula Vista property (APN 644-122-27-00) abuts the northwestern corner of the site, and the Shinohara Lane public right-of-way extends to the southwestern corner of the site; however, there is no existing public access easement or right-of-way across the project site. The site is currently fenced and is private property, and does not provide any public connection through the community. The proposed project would not physically divide an established community considering the site currently doesn't provide a connection through the community. No impact would occur.

b) Less-Than-Significant Impact.

Consistency with Land Use Plans and Policies

The site is currently designated under the Chula Vista General Plan as Limited Industrial (IL), which is intended for light manufacturing; warehousing; certain public utilities; auto repair; auto salvage yards; and flexible-use projects that combine these uses with associated office space (City of Chula Vista 2017a). The General Plan, Land Use Element contains several policies potentially applicable to the proposed project, including LUT 1.1 ensuring that land uses develop in accordance with the Land Use Diagram and Zoning Code, LUT 1.2 coordinate planning activities and resources to balance land uses, amenities, and civic facilities in order to sustain or improve the quality of life, and LUT 1.4 seek to achieve an improved balance between jobs and housing in Chula Vista. The project site is zoned Limited Industrial – Precise Plan Modifying District (ILP). The proposed project inpatient rehabilitation center is an Unclassified Use pursuant to CVMC Section 19.54.020 (h). As such, the proposed use would be permitted in this zone subject to approval of a Conditional Use Permit approved by the Planning Commission.

The proposed project would promote the City's policy objectives by providing a transitional land use between existing residential as and industrial uses as well as providing jobs near housing. In addition, the proposed project would not conflict with City policies pertaining to traffic and mobility operations (refer to Section XVIIa). Thus, the proposed project would 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. Impacts would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Mineral Resources Comments:

a) No Impact. Mineral resources in Chula Vista are described in the Environmental Element of the City's General Plan. Mineral Resource Zones (MRZs) are delineated in Figure 9-4, MRZ-2 Area Map (City of Chula Vista 2017a). Mineral resources located within the City include sand, gravel, and crushed rock resources, known collectively as construction aggregate. Construction aggregate is a valued resource considering the reduction in construction costs this resource provides, particularly for construction areas in proximity to the aggregate (City of Chula Vista 2017a). The project site is not located within an MRZ or located on or within any areas containing mineral resources as indicated in the City's General Plan. Additionally, the project site is not currently being used for mineral resource extraction. Given these factors, the proposed project would not result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State. No impact would result.

b) No Impact. See answer to Section XII(a). The proposed project would have no impact, as the proposed project is not within a designated mineral resource area (City of Chula Vista 2017a) and would not 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.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Noise Comments:

A Noise Technical Report prepared by Dudek for the proposed project (Appendix J). The analysis contained in this section is based on the findings of the Noise Technical Report.

a) Less Than Significant with Mitigation Incorporated.

Construction

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use,

the operations performed, and the distance between the source and receptor. Equipment that would be in use during construction would include, in part, graders, backhoes, concrete saws, excavators, dump trucks, loaders, cranes, manlifts, cement mixers, pavers, rollers, welders, and air compressors.

The City regulates construction noise by restricting the allowable hours of construction. Section 9.40.110 of the CVMC exempts construction noise from the stationary noise standards, provided that construction occurs between 7:00 a.m. and 10:00 p.m., Monday through Friday, and 8:00 a.m. to 10:00 p.m., Saturday and Sunday. Through adherence to the limitation of allowable construction times provided in the CVMC, the construction-related noise levels would not exceed any standards. None-the-less, the noise levels generated by construction activities are disclosed herein for informational purposes.

Construction noise, broken down by phase, was predicted at two distances to the nearest existing noise-sensitive receptor: 1) from the nearest position of the construction site boundary and 2) from the geographic center of the construction site. A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use, the results of which are identified in Table 6. As presented in Table 6, the estimated construction noise levels are predicted to be as less than 80 dBA L_{eq} over an 8-hour period at the nearest existing residences (as close as 15 feet away) when site preparation activities take place near the western project boundaries.

Table 6
Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Phase I		
Site Preparation (Loader)	79.5	67.8
Grading (Excavator)	78.4	69.8
Building Construction (Crane, Forklift, Backhoe, Welder, Generator)	75.5	74.3
Architectural Finishes (Air Compressor)	79.1	73.5
Paving (Roller, Backhoe, Dump Truck, Paver, Mixer Truck)	79.1	66.8
Phase II		
Site Preparation (Loader)	79.5	67.8
Grading (Concrete Saw, Loader)	79.1	76.4
Building Construction (Forklift, Backhoe)	74.2	73.0

Table 6
Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Architectural Finishes (Air Compressor)	74.2	72.9
Paving (Roller, Backhoe, Paver, Dump Truck)	78.5	66.8

Source: Appendix J.

Long-Term Operational Noise

Roadway Traffic Noise

The proposed project would result in the creation of additional vehicle trips on local roadways, which could result in increased traffic noise levels at adjacent noise-sensitive land uses. In particular, the proposed project would create additional traffic along Shinohara Lane, which according to the Local Mobility Analysis (LMA) prepared for the proposed project (Appendix K) would add 480 average daily trips to the segment of Shinohara Lane and adjacent roadways surrounding the project site.

The City's Noise Element establishes a policy for exterior sensitive areas to be protected from high noise levels. The Noise Element sets 65 dBA CNEL for the outdoor areas and 45 dBA CNEL for interior areas as the normally acceptable levels. However, existing levels from traffic already exceed this threshold. For the purposes of the Noise Analysis (Appendix J), roadway noise impacts would be considered significant when they cause an increase of 3 dB from existing noise levels. An increase or decrease in noise level of at least 3 dB is required before any noticeable change in community response would be expected (Caltrans 2013a). The noise model results are summarized in Table 7.

Table 7
Roadway Traffic Noise Modeling Results

Modeled Receiver Tag (Location Description)	Existing (2019) Noise Level (dBA CNEL)	Existing (2019) Plus Project Noise Level (dBA CNEL)	Buildout (2050) Noise Level (dBA CNEL)	Buildout (2050) Plus Project Noise Level (dBA CNEL)	Maximum Project-Related Noise Level Increase (dB)
ST1	43.1	42.4	45.8	45.3	0.0
ST2	60.5	60.8	63.5	63.6	0.3
ST3	69.5	69.6	71.1	71.1	0.0
ST4	41.3	41.2	43.2	43.0	0.0

Source: Appendix J.
Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.

Table 7 shows that the addition of proposed project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Additionally, at some modeled locations, expected traffic noise levels are predicted to decrease due to introduction of the proposed new building as sound path occlusion between them and the roadway noise source. Roadway noise impacts would be less than significant.

Traffic Noise Exposure to Future Project Occupants

The California Building Code requires that interior background noise levels not exceed a CNEL of 45 dB within habitable rooms. Typically, with the windows open, building shells provide approximately 15 dB of exterior-to-interior noise reduction; while with windows closed residential construction generally provides a minimum of 25 dB attenuation (FHWA 2011). Therefore, rooms exposed to an exterior CNEL not greater than 60 dB would result in an interior background CNEL of 45 dB or less. As provided in Table 8, no rooms would be exposed to exterior noise levels of greater than 60 dbA CNEL, and thus would comply with the California Building Code threshold of 45 dB CNEL within habitable rooms.

Table 8
On-Site Exterior Roadway Traffic Noise Modeling Results

Location	Modeled Receiver	Description	Predicted Traffic Noise Exposure at Modeled Receiver (dBA CNEL)
Western Façade	M1	Café area	41
Northern Façade	M2	Private Room	46
Eastern Façade	M3	Private Room	43
Southern Façade	M4	Private Room	39

Source: Appendix J.
Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level.

Stationary Operations Noise

The incorporation of new facilities attributed to development of the proposed project would add a variety of noise-producing stationary mechanical equipment.

Facility Unit Hearing, Ventilation, and Air Conditioning Noise

According to the proposed project plans, the facility would include ten (10) air handling units (AHU), 5 ductless split system units (DSO), and 14 exhaust fans spread across the roof. These distinct units of rooftop HVAC equipment individually have a sound emission source level between 58 dBA and 78 dBA at 3 feet. The project site plan shows that the AHU units would

be installed behind 6-foot screening walls. The closest existing noise-sensitive residential receptor to the west of the proposed project's building would be as close as approximately 100 horizontal feet to what would be an arrangement of up to 5 AHU units, 3 DSO units, and 5 exhaust fans. However, the predicted sound emission level from the combination of these units would be no more than 44 dBA L_{eq}, due to the higher elevation of the sources on the roof and sound occlusion of the noise wall, and their horizontal distances away from the noise sensitive receivers. Thus, the sound emission would be compliant with the City's nighttime threshold of 45 dBA hourly $L_{eq.}$ Under such conditions, the operation of residential air-conditioning units would result in less-than-significant noise impacts.

Emergency Generator

The proposed project also features a backup generator that would be installed on ground level north of the building. The City of Chula Vista exempts noise from the backup generator during actual emergencies, on the basis of CVMC 2.14.020 defining emergencies and CVMC 19.68.020.L defining "emergency work," as previously presented in Section 2.3, such that the latter would logically include operation of the generator during emergency conditions to "alleviate physical trauma" (i.e., continue function of the facility to treat patients). However, noise emission from regular testing at an expected frequency of up to one 30-minute test per month during daytime hours would need to comply with the City's established noise limit at the property line: 55 dBA hourly L_{eq}. The aggregate noise level from the backup generator when tested at full load would yield a property line noise level of 56 dBA hourly L_{eq}. If tested for only up to a 15-minute period, the hourly L_{eq} value would drop by 3 dB and become 53 dBA. Thus, if the test must proceed for a full 30 minutes, then the noise at the nearest property to the western boundary of the project site may exceed 55 dBA hourly $L_{eq,}$, resulting in a potentially significant impact, requiring implementation of mitigation measure **MM-N-2**. With implementation of **MM-N-2**, impacts would be reduced to a less-than-significant level with mitigation incorporated.

Loading Dock Operations

The proposed project also features a loading dock at the north side of the new building facing the stand-by generator area and trash enclosure. Predicted hourly noise exposure levels from the idling truck per hour at the loading dock area are presented at eight sample receptors in Table 9, and all are below the City's Municipal Code 45 dBA hourly L_{eq} nighttime limit.

Table 9
Estimated Loading Dock Area Noise Emission

Receptor Street Address or Location	Approximate Horizontal Distance to Loading Dock Modeled Noise Emission Source (feet)	Predicted Hourly L_{eq} (dBA)	Exceedance of City Nighttime Limit (45 dBA)?
Southern-most apartment of the complex along Mendocino Drive (north of the project site)	290	36.2	No
516 Timber Street	210	37.6	No
515 Tanoak Court	140	38.3	No
514 Tanoak Court	150	38.8	No
512 Tanoak Court	195	34.6	No
1649 Oleander Avenue	225	24.4	No
1651 Oleander Avenue	305	21.8	No
1655 Oleander Avenue	360	16.4	No

Notes: dBA = A-weighted decibel; L_{eq} = energy-equivalent sound level.

When combined logarithmically with the rooftop HVAC noise emission, which is not expected to exceed 44 dBA hourly L_{eq}, the loading dock noise should not cause the total (i.e., HVAC + idling truck) to exceed 45 dBA hourly L_{eq} and therefore yield an anticipated less-than-significant impact.

Ambulance Idling

Transportation by ambulance of most patients would be done on a non-emergency basis without the use of sirens. Thus, use of sirens would be extremely rare. In addition, noise from ambulance operations during actual emergency situations are be exempt from City standards. However, noise from an idling ambulance (without siren or other audible warning device) would be subject to the City's Municipal Code nighttime hourly L_{eq} noise limits of 45 dBA at night at residential receivers or 55 dBA hourly L_{eq} at commercial receivers.

Each of the two development phases of the proposed project have an ambulance "drop-off" area on the northeastern side as well as a drop-off area in front of the building where an idling vehicle may be located (see Figures 3a and 3b). The front drop-off area is the same location under both Phases. The northeastern drop-off area is located nearest to the adjacent property line under Phase 2. Due to the closer distance and considering that noise attenuates over distance, the Phase 2 northeastern drop-off was analyzed herein as it represents the worst-case noise impact. As detailed below, an ambulance idling at either the front drop-off area or the northeastern drop-off area would result in noise generation below the City's Municipal Code property line noise limit and would therefore be less than significant.

Front Drop-off Area

The front drop-off area would be located approximately 40 feet south of the proposed new building southern façade and approximately 100 feet due east of the western property boundary (Figure 3a and 3b). Predicted hourly noise exposure levels from an idling ambulance at the front drop-off area are presented at six sample receptors in Table 10, and all are below the City's 45 dBA hourly L_{eq} nighttime limit.

Table 10
Estimated Ambulance Idling at Southern Drop-off

Receptor Street Address or Location	Approximate Horizontal Distance to Loading Dock Modeled Noise Emission Source (feet)	Predicted Hourly L_{eq} (dBA)	Exceedance of City Nighttime Limit (45 dBA)?
515 Tanoak Court	360	27.8	No
514 Tanoak Court	295	32.8	No
512 Tanoak Court	225	36.4	No
1649 Oleander Avenue	200	32.8	No
1651 Oleander Avenue	135	36.3	No
1655 Oleander Avenue	115	31.6	No

Notes: dBA = A-weighted decibel; L_{eq} = energy-equivalent sound level.

When combined logarithmically with the rooftop HVAC noise emission (studied in the previous subsection), which is not expected to exceed 44 dBA hourly L_{eq}, the idling ambulance (or fire truck) noise should not cause the total (i.e., HVAC + idling truck) to exceed 45 dBA hourly L_{eq} and therefore yield an anticipated **less-than-significant impact**.

Northeastern Drop-off

As indicated above, there would be an ambulance drop off area in the northeastern area of the site under both phases. However, with the addition in the northwestern area of the site, the drop-off location would be located nearer to the property line under Phase 2. As the Phase 2 northeastern drop-off location is nearest to the property lines, it was utilized to provide the worst-case idling noise impact. Phase 2 location would be 10 feet to the east of the addition, which would be approximately 65 feet west of the proposed project's eastern property boundary that abuts the existing commercial building (i.e., Curbell Plastics) (Figure 3b). Table 11 identifies the northeastern drop-off noise levels at the nearest commercial and residential receivers. As shown, the idling of an ambulance at the northeastern drop-off location would not result in noise in exceedance of either the 55 dBA hourly L_{eq} nighttime limit for commercial uses nor the 45 dBA hourly L_{eq} nighttime limit for residential uses.

Table 11
Estimated Ambulance Idling at Eastern Drop-off (Phase 2)

Receptor Street Address or Location	Approximate Horizontal Distance to Loading Dock Modeled Noise Emission Source (feet)	Predicted Hourly L_{eq} (dBA)	City Nighttime Hourly Noise Limit, and exceeded?
Southern-most apartment of the complex along Mendocino Drive (north of the project site)	380	31.6	45 dBA L_{eq}, No
Commercial building to the east	65	52.2	60 dBA L_{eq}, No

Notes: dBA = A-weighted decibel; L_{eq} = energy-equivalent sound level.

When combined logarithmically with the rooftop HVAC noise emission studied in the previous subsection, which is not expected to exceed 44 dBA hourly L_{eq}, the idling ambulance (or fire truck) noise would not cause the total (i.e., HVAC + idling truck) to exceed the applicable City hourly noise limits and therefore would result in a less-than-significant impact.

b) Less-Than-Significant Impact. Construction activities may expose persons to excessive groundborne vibration or groundborne noise. Vibration impacts to buildings are generally discussed in terms of inches per second (ips) peak particle velocity (PPV). Vibration can also be annoying and thereby impact occupants of structures, and vibration of sufficient amplitude can disrupt sensitive equipment and processes (Caltrans 2013b). Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities where sudden releases of subterranean energy or powerful impacts of tools on hard materials occur. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site also have the potential to cause high vibration amplitudes.

Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2013b). Caltrans guidance indicates that building occupants exposed to continuous groundborne vibration at a level of 0.1 ips PPV would find it either "strongly perceptible" or "begins to annoy" and thus for purposes of this assessment would be considered a likely significant impact. Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.3 ips PPV would represent the threshold for building damage risk.

a) Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils

and rock strata can be estimated with expressions found in Federal Transit Administration (FTA) and Caltrans guidance. The predicted 0.094 ips PPV at the nearest residential receiver 24 feet away from on-site operation of the bulldozer during grading would not surpass the guidance limit of 0.3 to 0.5 ips PPV for preventing damage to residential structures (Caltrans 2013b). Because the predicted vibration level at 24 feet is less than both the annoyance and building damage risk thresholds, vibration from project conventional construction activities is considered less than significant.

Once operational, the proposed project would not be expected to feature major on-site producers of groundborne vibration. Anticipated mechanical systems like pumps are designed and manufactured to feature rotating components (e.g., impellers) that are well-balanced with isolated vibration within or external to the equipment casings. Vibration impacts due to proposed project operation would be less than significant.

c) Less-Than-Significant Impact. There are no private airstrips within the vicinity of the proposed project. The closest airport to the project site is the Brown Field Municipal Airport approximately 2.7 miles southeast of the site. The project site is located outside of the Noise Compactivity Policy Map Noise Contours (San Diego County Regional Airport Authority 2010). Thus, impacts from aviation overflight noise exposure would be considered less than significant.

Mitigation: The following mitigation measure is required:

MM-N-1 Prior to the issuance of a Conditional Use Permit, the City shall include a condition that requires the following:

Prior to backup generator testing, the project owner/manager (or its testing contractor) shall install a temporary sound blanket on the chain-link fence that forms the western perimeter of the backup generator outdoor space. (Alternately, the sound barrier may be hung or suspended from a free-standing structure external to and parallel with the chain-link fence; or, the barrier could be formed from an arrangement of panels. Either method may be required to ensure proper airflow to the operating generator, or to expedite barrier setup on site.) The installed temporary sound blanket, curtain, or panel assembly shall feature a minimum sound transmission class (STC) rating of at least 15, and if arranged as multiple elements must not exhibit air-gaps through which noise may bypass the barrier material. When the generator testing is completed, the temporary sound barrier can be disassembled and removed from the site (or stored on site, per project owner/manager discretion) until needed for the subsequent monthly test.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING				
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Population and Housing Comments:

a) No Impact. The proposed project is an inpatient rehabilitation center located on a previously disturbed site at the terminus of a dead-end road. The proposed project would not directly or indirectly induce population growth as it does not propose new homes nor include the extension of roadways or other infrastructure and would operate as a population-serving facility. Thus, the proposed project would induce substantial population growth.

b) No Impact. The proposed project would not displace any existing housing or people, since the project site is currently vacant. Construction of replacement housing elsewhere would not be required, since the site does not serve as existing housing. No impacts would result.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
Would the project:				
a) 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 objectives for any public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

Public Services Comments:

a) Less-Than-Significant Impact.

i) Less-Than-Significant Impact. The City of Chula Vista, General Plan Public Facilities and Service Element contains policies including requiring new development projects to demonstrate adequate access for fire vehicles, and requiring new development to demonstrate adequate water pressure. The proposed project would comply with these policies by providing fire access and water adequacy plans and studies to the City of Chula Vista during the design review process.

The proposed project would be served by the Chula Vista Fire Department, which has nine fire stations (City of Chula Vista n.d.). The project site is within the service area of Fire Station 3, located at 1410 Brandywine Avenue, approximately 1 mile to the north. Additionally, the proposed project would be required to pay the development impact fees at the time of building permit issuance. The proposed project would not adversely affect existing levels of fire protection services or create a significant new demand and would not require the construction of a new or expansion of an existing facility. Therefore, impacts associated with fire protection would be less than significant.

ii) Less-Than-Significant Impact. The City of Chula Vista, General Plan Public Facilities and Service Element contains policies including requiring new development projects to demonstrate adequate access for police vehicles, and encouraging Crime Prevention Through Environmental Design (CPTED) techniques in new development and redevelopment projects (City of Chula Vista 2017a), The proposed project would comply with these policies by providing emergency access plans and studies to the City of Chula Vista during the design review process.

The project site would be served by the Chula Vista Police Department (CVPD). The project site is located within beat 24 of the CVPD, and 5.6 miles southwest of the CVPD station. The proposed project would be required to pay the development impact fees at the time of building permit issuance. The proposed project would not adversely affect existing levels of police services or create a significant new demand, and would not require the construction of a new or expansion of an existing facility. Therefore, impacts associated with police protection would be less than significant.

iii) No Impact. As a rehabilitation facility, the proposed project would not introduce a new student population within the service boundaries of the school districts that serve the City. Therefore, the proposed project would not adversely affect existing levels of school services or create a significant new demand, and would not require the construction of a new or expansion of an existing facility. Therefore, no impact would occur.

iv) Less-Than-Significant Impact. The nearest existing park is Valle Lindo Park, located approximately 0.3 miles north of the project site. The proposed project would not introduce a new population to the area, and would therefore not result in an increase the demand for parks. The proposed project would include courtyard and landscape areas for the patients and employees. Additionally, the patients and employees of the inpatient

rehabilitation center are unlikely to increase any usage at public parks considering patients would be required to stay on the property. Impacts would be less than significant.

v) Less-Than-Significant Impact. The proposed project would be required to pay fees, as applicable, which would provide funds to the City that may only be used for funding the expansion of public facilities to serve new development. The potential future expansion of public facilities that may result from the use of such fees is not reasonably foreseeable and beyond the scope of this MND. With adherence to the CVMC and payment of fees, the proposed project would have less-than-significant impacts on other public facilities.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
Would the project:				
a) 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?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☐	☒

Recreation Comments:

a) Less-Than-Significant Impact. As stated in Section XV(a)(iv), the nearest existing park is Valle Lindo Park, located approximately 0.3 miles north of the project site. The proposed project would not introduce a new population to the area, which would increase the demand for parks. The proposed project would include courtyard and landscape areas for the patients and employees. Additionally, the patients and employees of the inpatient rehabilitation center are unlikely to increase any usage at public parks, as patients would be limited to the facility. The proposed

project would not 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, and impacts would be less than significant.

b) No Impact. The proposed project consists of an 80-bed inpatient rehabilitation center, which includes a courtyard and landscape areas that are not classified as recreational facilities. Patients and employees would be allowed to utilize the provided on-site amenities and no off-site recreation facility improvements would be required. No new recreational facilities would be required to serve the proposed project, and no impact would occur.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) 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)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

A LMA (Appendix K) and a Vehicle Miles Traveled (VMT) Analysis (Appendix L) were prepared by Dudek for the proposed project. The analysis contained in this section is based on the findings of the LMA and VMT Analysis.

Transportation Comments:

a) Less-Than-Significant Impact.

Consistency with City Policies Pertaining to Traffic and Mobility Operations

The Local Mobility Analysis (LMA; Appendix K) prepared for the proposed project assessed the proposed project's consistency with relevant programs, plans, ordinances, and/or policies relating to transit, roadway, bicycle, and pedestrian facilities. Specific to roadway facilities, the proposed project's consistency with the traffic-related operations identified in the General Plan Land Use and Transportation Element and is addressed herein, as well as the proposed project's consistency with the City's Traffic Impact Analysis Requirements Guidelines (Traffic Impact Threshold Standards).

A component of this analysis includes consideration of whether LOS targets identified in the General Plan and Traffic Impact Threshold Standards would be achieved or whether the proposed project would conflict with such targets. To assist in that analysis, the City's Significance Criteria regarding roadway segments, intersections, and freeway operations are included below.

Roadway Segments

A. Project-specific effect if all three of the following criteria are met:
    i. Level of service is LOS D, LOS E, or LOS F
    ii. Project trips comprise 5% or more of total segment volume
    iii. Project adds greater than 800 ADT to the segment
B. Cumulative effect if only (A) is met. However, if the intersections along an LOS D or LOS E segment all operate at LOS D or better, the segment impact is considered not significant since intersection analysis is more indicative of actual roadway system operations than street segment analysis. If segment level of service is LOS F, effect is substantial regardless of intersection LOS.
C. Notwithstanding the foregoing, if the effect identified in paragraph (A), above, occurs at study horizon Year 10 or later, and is off site and not adjacent to the project site, the effect is considered cumulatively substantial. Study horizon Year 10 may be that typical SANDAG model year that is between 8 and 13 years in the future. In this case of a traffic study being performed in a model year not divisible by 5 (i.e., 2005, 2010, 2015,

and 2020), study horizon Year 10 would correspond to the SANDAG model for year 2010 and would be 8 years in the future. If the model year is less than 7 years in the future, study horizon year 10 would be 13 years in the future.

D. In the event a direct identified project-specific effect in paragraph (A), above, occurs at study horizon Year 5 or earlier, and the impact is off site and not adjacent to the project site, but the property immediately adjacent to the identified project-specific effect is also proposed to be developed in approximately the same time frame, an additional analysis may be required to determine whether or not the identified project-specific effect would still occur if the development of the adjacent property does not take place. If the additional analysis concludes that the identified project-specific impact is no longer a direct effect, then the effect would be considered cumulative.

Signalized and Unsignalized Intersection Impacts

A. Project-specific impact if both the following criteria are met:
   i. Level of service is LOS E or LOS F
   ii. Project trips comprise 5% or more of entering volume
B. Cumulative impact if only (i) is met.

Freeways

A. Project-specific impact if both the following criteria are met:
   i. Freeway segment LOS is LOS E or LOS F.
   ii. Project comprises 5% or more of the total forecasted ADT on that freeway segment.
B. Cumulative impact if only (i) is met.

The City's General Plan Land Use and Transportation Element sets forth goals and policies regarding the street network. Pursuant to these policies, an analysis of local traffic impacts and impacts on the regional transportation system is provided below to determine whether the proposed project would conflict with the target LOS identified in the City's General Plan Land Use and Transportation Element.

Project Trip Generation

According to the LMA prepared, the proposed project would not generate as much traffic as a typical hospital but would generate more than a convalescent/nursing home due to its operation as an in-patient rehabilitation hospital. Based on a site-specific trip generation analysis completed for the project, the proposed project would generate approximately 480

daily trips, 34 AM peak-hour trips (20 inbound and 14 outbound), and 34 PM peak-hour trips (14 inbound and 20 outbound).

Existing Plus Project Conditions

Project traffic volumes were added to the Existing traffic volumes to derive the Existing plus Project traffic condition for both roadway segments and intersection operations. As detailed in Appendix K, with the addition of project traffic, the study area roadway segments of Brandywine Avenue and Shinohara Lane would continue to operate with LOS A under Existing plus Project Conditions. In addition, all of the study area intersections are forecast to continue to operate with satisfactory LOS (at LOS D or better) under Existing plus Project conditions during both peak hours Therefore, the proposed project would not cause a substantial direct or cumulative effect to the roadway segments or intersections under Existing plus Project conditions. Thus, the project would not result in a conflict with the applicable General Plan policies or Traffic Impact Threshold Standards under the Existing Plus Project conditions.

Buildout Year (2035) Plus Project Conditions

As detailed in Appendix K, all intersections and segments would operate at acceptable levels under the Buildout Year (2035) Plus Project Conditions except the Brandywine Avenue/Main Street intersection.

Under Buildout Year (2035) plus Project conditions, the Brandywine Avenue/Main Street intersection continues to operate at LOS D during the AM peak hour but would operate at LOS F during the PM peak hour under buildout conditions (Table 12). Per City's applicable criteria, a project would conflict with the applicable LOS requirements if the LOS of an intersection operates at LOS E or LOS F and adds a 5% increase to intersection traffic, while a conflict under the cumulative project scenario would conflict with the applicable LOS requirements it the proposed project's trips adds less than 5% of traffic to the applicable intersection. Since the proposed project does not add more than 5% traffic of the total entering traffic at the Brandywine Avenue/Main Street intersection (which operates at LOS F), the proposed project's addition of traffic would be considered a cumulative contribution to a substantial cumulative effect.

Table 12
Buildout Year plus Project Weekday Peak Hour Level of Service

No.	Intersection	Control	LOS Method	Buildout				Buildout plus Project				Project % of Entering Volume		Substantial Effect/Conflict?	
				AM Peak		PM Peak		AM Peak		PM Peak					
				Delay[1]	LOS[2]	Delay[1]	LOS[2]	Delay[1]	LOS[2]	Delay[1]	LOS[2]	AM	PM	AM	PM
1	Brandywine Avenue/Main Street	Signalized	HCM	46.7	D	**80.6**	**F**	48.6	D	**83.3**	**F**	0.8%	0.7%	Yes/Yes (Cumu)	Yes/Yes (Cumu.)
2	Brandywine Avenue/ Shinohara Lane	Unsignalized	HCM	14.3	B	11.1	B	13.3	B	11.8	B	2.8%	2.4%	No/No	No/No
3	Oleander Avenue/ Sequoia Street	Unsignalized	HCM	10.4	B	8.3	A	10.4	B	8.3	A	0.6%	0.8%	No/No	No/No
4	Shinohara Lane/Project Access	Unsignalized	HCM	Does not exist				No delay reported due to intersection configuration - Operates at LOS A				100%	100%	No/No	No/No

Source: Appendix K.
Notes: HCM = Highway Capacity Manual; Int. = Intersection, Cumu. = Cumulative Impacts.
[1] Delay in seconds per vehicle
[2] Level of Service (LOS)

The proposed project would provide a contribution towards the City's Traffic Signal Fee program. This Traffic Signal Fee program includes regular assessments for deficiencies and planned improvements based on those deficiencies throughout the City. Thus, payment of this fee in combination with other cumulative projects would provide the funding needed for signalization modification improvements at Brandywine Avenue/Main Street when they are needed, which would alleviate the substantial cumulative effect. The substantial cumulative effect at the Brandywine Avenue/Main Street intersection would be alleviated through the implementation of a traffic signal modification that would include overlap of the southbound right movement with the eastbound left movement (Table 13). With payment of the Traffic Signal Fee (PDF-TRA-1), the proposed project would be consistent with the General Plan intersection operation policies in the Buildout Year (2035) conditions.

Table 13
Operational Improvement Buildout Year (2035) plus Project Weekday Peak Hour Intersection LOS

No.	Intersection	Control	LOS Method	AM Peak		PM Peak	
				Delay[1]	*LOS*[2]	*Delay*[1]	*LOS*[2]
1	Brandywine Avenue/Main Street	Signalized	HCM	43.6	D	54.2	D

Source: Appendix K.
Notes: HCM = Highway Capacity Manual.
[1] Delay in seconds per vehicle
[2] Level of Service (LOS).

b) Less-Than-Significant Impact. As required by CEQA Section 15064.3, on July 1, 2020, CEQA analyses prepared for proposed projects must include an analysis of VMT, which is defined "as the amount and distance of automobile travel attributable to a project."

At this time, the City of Chula Vista has not adopted methodologies for performing VMT analysis. And although the updated CEQA Guidelines themselves do not establish a significance threshold, the OPR's Technical Advisory and the Draft Guidelines (OPR 2018) recommends a threshold of significance for residential, office and other land uses. The recommended threshold for per capita or per employee for residential or office projects, respectively, is 15% below that of existing development per OPR or 85% of the existing development per the Draft Guidelines (OPR 2018). Therefore, for proposed project, a potentially significant impact would be identified if the project's VMT/Employee is greater than 85% of the San Diego's regional average. The City of Chula Vista has recently drafted Transportation Study Guidelines, which include methodology, screening criteria, and analysis procedures for conducting a CEQA VMT analysis for projects located within the City.

VMT Screening for Proposed Projects

The OPR's Technical Advisory suggests that agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

Minimum Project Size

The determination of minimum project size for VMT analysis is based on regional standards for transportation analyses that were documented in the Guidelines for Traffic Impact Studies in the San Diego Region (SANTEC/ITE 2000). The following level of VMT analysis is recommended based on project size (expressed in terms of Average Daily Trips generated by the project) and zoning (Table 14). It should be noted that the City's Draft Transportation Study Guidelines recommend that any projects generating 200 or less

average daily trips may be presumed to have a less than significant impact absent substantial evidence to the contrary. This small project screening would apply to all projects within the City, regardless of consistency with the General Plan.

Table 14
Level of VMT Analysis

Projects Inconsistent with General Plan or Community Plan	
Average Daily Trips	*Level of Analysis*
0–500	VMT Analysis Not Needed/VMT Impacts Presumed Insignificant
500 or greater	VMT Analysis Recommended
Projects Consistent with General Plan or Community Plan	
Average Daily Trips	*Level of Analysis*
0–1,000	VMT Analysis Not Needed/VMT Impacts Presumed Insignificant
1,000 or Greater	VMT Analysis Recommended

Source: Appendix L.

Projects Located Near Transit Stations

OPR's technical advisory contains the following guidance regarding projects located near transit stations:

Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 0.5 miles of an existing major transit stop or an existing stop along a high quality transit corridor would have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project would still generate significant levels of VMT.

Minimum Project Size Based Screening

As discussed in Section XI(b), the proposed project would generate approximately 480 daily trips, 34 AM peak-hour trips (20 inbound and 14 outbound), and 34 PM peak-hour trips (14 inbound and 20 outbound). Per City of Chula Vista General Plan, the project site is zoned ILP. The proposed inpatient rehabilitation center is an Unclassified Use pursuant to Section 19.54.020 (h) of the CVMC. As such, the proposed use would be permitted in this zone subject to approval of a Conditional Use Permit approved by the Planning Commission. The proposed project does not include a General Plan Amendment. Thus, the proposed project would be consistent with the General Plan. However, the proposed project generates more than 200 daily trips. Per San Diego ITE guidelines, the proposed project does not warrant a VMT analysis,

and impacts can be presumed to be less than significant. However, since the project generates more than City's threshold of 200 daily trips, additional analysis was conducted to validate the findings of a less-than-significant impact.

VMT Map Based Screening

The proposed project would have 210 employees and therefore is likely to have commute characteristics similar to an office development. Therefore, the average VMT/employee at the census tract level was utilized for comparing the VMT thresholds for SB 743 analysis. The VMT Screening Tool published by the City were used to determine the VMT/employee in the census tract in which the proposed project is located (refer to Figure 2 in Appendix L).

According to SANDAG's VMT/Employee Map (SANDAG 2015b), the project site is located is Census Tract 133.12. The VMT per employee of this census tract is 21.40 miles per employee, which 78.70% of the regional. Since the project VMT per employee would be less than 85% of the regional VMT per employee, the proposed project is screened out from a detailed VMT analysis. The proposed project is located in a in a VMT-efficient area and would therefore have a less-than-significant impact.

Locational Analysis

As discussed in Appendix L, the location of the proposed project is strategic for a facility of this nature as it is located close to I-805 within the City of Chula Vista. The proposed project would divert patient trips that are destined to other hospital facilities further away from the City of Chula Vista (as shown in Table 15), and this diversion would reduce the VMT generated by those patients and likely from visitors.

Table 15
Location of Rehabilitation Facilities in the San Diego Region

Rehabilitation Facility	Approximate Distance from Project Site	Address
1. Paradise Valley Hospital	8 miles	2400 East Fourth Street National City, CA 91950
2. Sharp Memorial Hospital	18 miles	7901 Frost Street, CA 92123 San Diego, CA 92123
3. Alvarado Hospital	20 miles	6655 Alvarado Road, San Diego, CA 92120 San Diego, CA 92120
4. Sharp Grossmont Hospital	17 miles	5555 Grossmont Center Drive La Mesa, CA 91942

Based on the VMT screening and analysis above for the proposed project, which includes an analysis of the minimum project size criteria, SANDAG's VMT maps-based screening analysis, and the comparison of the facility to the location of other rehabilitation facilities in the San Diego region, VMT impacts would be less than significant.

c) Less Than Significant with Mitigation Incorporated. The main access point to and from the project site would be provided via Shinohara Lane. This access point has been designed to be consistent with the City's circulation standards, and would not create a hazard for vehicles, bicycles, or pedestrians. The proposed project would include striping along Shinohara Lane to further organize traffic and improve safety. Access would be adequate for pedestrian vehicles, emergency vehicles, and fire vehicles. As a medical rehabilitation facility, the project does not propose any land uses that would introduce incompatible uses with the surrounding roadways.

However, in addition to the roadway segment and intersection analysis completed for the proposed project (assessed under Section XVII[a]), the City requested the preparation of a queuing analysis to assess the signalized intersection of Brandywine Avenue and Main Street. As shown in Table 16, the queue for the eastbound left movement exceeds the storage length available for this movement, under all scenarios analyzed. The addition of project traffic under Existing plus Project and Buildout plus Project conditions, increases the queue length (in feet) nominally (assuming 25 feet per car), resulting in a less-than-significant impact.

Table 16
Project Queuing Summary

Intersection	Movement	Vehicle Storage Length[2]	Queue Length[1]							
			Existing		*Existing plus Project*		*Buildout*		*Buildout plus Project*	
			AM	*PM*	*AM*	*PM*	*AM*	*PM*	*AM*	*PM*
Brandywine Avenue/Main Street	EBL	230	**250**	**272**	**257**	**279**	**293**	**287**	**297**	**292**
	EBR	150	31	28	29	26	35	31	46	32
	WBL	210	32	99	35	51	92	168	111	176
	NBL	130	32	82	37	84	34	92	40	92
	NBL	130	*	44	*	40	5	77	*	84
	SBL	140	128	137	124	**141**	**176**	**190**	**181**	**185**
	SBR	140	92	106	90	114	136	**169**	**143**	**167**

Source: Appendix K.
Notes:
1 Based on 95th percentile (design) queue length in SimTraffic 10.
2 Measured in feet.

The queue for the southbound left movement exceeds the storage length available for this movement, under Existing plus Project conditions during the PM peak hour, and under the Buildout and Buildout plus Project conditions during both the AM and PM peak hours. The addition of project traffic increases the queue length (in feet) nominally (assuming 25 feet per car) and is therefore considered to be a less-than-significant impact.

For the southbound right movement, the queue exceeds the storage length under the Buildout conditions during the PM peak hour and under the Buildout plus Project conditions during both the AM and PM peak hour. However, the increase in queue length is equivalent to one-two cars under any scenario shown in Table 16 and is therefore considered a less-than-significant impact.

In regard to a project-specific impact, as shown in queuing analysis, the project traffic would add to the existing and future deficiency of storage length along eastbound left and southbound left turn lanes at the Brandywine Avenue/Main Street intersection under Existing plus Project and Buildout Year (2035) plus Project conditions. Additionally, under the cumulative impact scenario, the project traffic would add to the existing and future deficiency of storage length along eastbound left, southbound left and southbound right turn lanes at the Brandywine Avenue/Main Street intersection under Existing plus Project and Buildout Year (2035) plus Project conditions, resulting in a potentially significant impact. Implementation of mitigation measure MM-TRA-1 would reduce this impact to a less-than-significant level.

d) Less-Than-Significant Impact. During construction activities, construction equipment staging areas would be restricted to on-site locations. All construction within public roadways would not impede access or movement of emergency vehicles. As indicated in the City's General Plan, the nearest evacuation routes are Main Street and I-805, located just south and west of the project site respectively (City of Chula Vista 2017a). The proposed project is anticipated to generate a total of 480 daily trips, including 34 (20-in/14-out) AM peak-hour trips and 34 (14-in/20-out) PM peak-hour trips. As such, traffic generated by the proposed project would not be substantial and would not impact emergency access in the area.

The primary site access is proposed to be from Shinohara Lane. The 40-foot wide Shinohara Lane transitions into a 24-foot-wide project access roadway that loops around the project site, providing vehicular access to the site and the parking areas. The site plan illustrates two phases of the proposed project, phase 1 includes parking spaces located to both the north and south of the building within surface lots, and a drop-off circle. With the construction of phase 2, layout of the parking areas to the north and east side of the project site and the non-emergency ambulance drop-off would be reorganized. As discussed in the LMA, the project access intersection is anticipated to operate at LOS A under the 2035 Buildout Year plus Project Traffic condition

The proposed project access has been designed to comply with Fire Department requirements and standards to ensure that adequate access is provided. The proposed hammer head at the project entrance would be adequate to allow for turn arounds. Additionally, a fire truck access plan has been prepared for the project, which shows that the proposed project would not involve the permanent closure of any surface streets that would increase the response time for emergency services. The proposed project would comply with all fire codes, and emergency access would be maintained by foot and by truck. Therefore, impacts to emergency access would be less than significant.

Mitigation: The following mitigation measure is required to be implemented as part of the proposed project:

MM-TRA-1 Prior to issuance of occupancy permit, to provide additional storage length for vehicles at the Brandywine Avenue/Main Street intersection, the project applicant shall:

- Re-stripe the eastbound left-turn lane to accommodate additional vehicle storage. The existing median along Main Street shall be re-striped to extend the eastbound left-turn lane to approximately 300 feet to provide adequate vehicle storage;
- Install "KEEP CLEAR" pavement markings on Brandywine Avenue in front of the existing commercial driveway located north of the intersection, to allow vehicles to access the commercial use north of the "KEEP CLEAR" pavement markings; the southbound approach can be re-striped to accommodate additional storage for the southbound left- and right turn lanes.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

Tribal Cultural Resources Comments:

a) Less-Than-Significant Impact. The project site is not listed nor is it eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k). No impact would occur.

b) Less Than Significant with Mitigation Incorporated. Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include "non-unique archaeological resources" that, instead of being important for "scientific" value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC § 21080.3.1(a)). Although no Tribal Cultural Resources were identified within the project site, there is a potential for the construction of the proposed project to impact buried and unknown Tribal Cultural Resources due to its location to known recorded resources in the near vicinity (see Section V, Cultural Resources). In addition, a tribe consulted during the SLF search did identify the site as being within their historic area and requested inadvertent discovery notification and participation. Thus, the project would result in a potentially significant impact to Tribal Cultural Resources. Implementation of mitigation measure **MM-CUL-1** and **MUL-CUL-2** would reduce all impacts to Tribal Cultural Resources to below a level of significance.

Mitigation: The mitigation measure MM-CUL-1 and MM-CUL-2 would be required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Utilities and Service Systems Comments:

The following analysis is based on the Preliminary Drainage Report (Appendix H), the Priority Development (PDP) Stormwater Quality Management Plan (Appendix I), and sewer calculations (Appendix M) prepared by APD Consultants, Inc.

a) Less-Than-Significant Impact. The City operates and maintains its own sanitary collection system that connects to the Metro sewerage system for treatment and disposal. Wastewater generated by in the Otay Water District service area is sent to the Point Loma Wastewater Treatment Plant (PLWTP) or the South Bay Water Reclamation Facility (SBWRF), where it

is treated to secondary levels and discharged to the Pacific Ocean or treated to tertiary levels at the SBWRF and used as recycled water (Sweetwater Authority 2016).

The proposed project consists of an 80-bed inpatient rehabilitation center; thus, the proposed project is not anticipated to introduce a new population base that would require new or expanded water or wastewater treatment facilities, as the rehabilitation facility would serve the existing population base. The proposed facilities would connect to the existing water service system located within Shinohara Lane, and would not require the construction or expansion of water service facilities beyond those proposed to serve the project site or already planned by the City (Appendix M). The City of Chula Vista Wastewater Collection System Master Plan (City of Chula Vista 2014) has identified citywide improvements to accommodate flows through 2050 and does include improvements to the sewer lines in Main Street downstream from the site. These improvements are cumulatively needed to service the City growth identified in the City's General Plan. In accordance with the Mitigation Fee Act (Government Code §§66000-66025) and the Quimby Act (Government Code §66477), the project would provide payment of development impact fees such as sewer fees (City of Chula Vista 2021). Payment of such fees is required under Section 3.42.010 of the Chula Vista Municipal Code, and would offset potential cumulative sewer impacts. Such improvements are intended to provide service to uses pursuant to the buildout of the General Plan and associated impacts were addressed in the City's General Plan Final Environmental Impact Report (City of Chula Vista 2005b and 2017a). The City's General Plan Final Environmental Impact Report (City of Chula Vista 2005b and 2017a) is incorporated by reference herein. Additionally, dry utility connections would be made within Shinohara Lane to existing utility infrastructure, and no expansion of dry utility infrastructure would be required

Additionally, as discussed in Section X, Hydrology and Water Quality, the proposed drainage system within the project site would continue to drain to the southeastern corner of the project site, conveyed through the local storm drain system along Main Street, and before discharging into the Otay River and San Diego Bay. The proposed project would not directly require any additional storm drain expansions beyond those proposed as part of the project. The project would contribute to a cumulative need for storm drain improvements identified in the City's 2004 Drainage Master Plan (City of Chula Vista 2005a). Such improvements are intended to provide service to uses pursuant to the buildout of the General Plan. In accordance with the Mitigation Fee Act (Government Code §§66000-66025) and the Quimby Act (Government Code §66477), the project would provide payment of development impact fees such as storm drain fees (City of Chula Vista 2021). Payment of such fees is required under Section 3.42.010 of the Chula Vista Municipal Code, and would offset potential cumulative storm drain impacts and

associated impacts were addressed in the City's General Plan Final Environmental Impact Report (City of Chula Vista 2005b and 2017a).

Therefore, the proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. Impacts would be less than significant.

b) Less-Than-Significant Impact. Water service to the proposed project would be from the existing public water line, which is a 12-inch water line in Shinohara Lane. The existing public water system provides the necessary flow and pressure for the proposed private fire protection system. The City receives its water from the Sweetwater Authority and Otay Water District. These water agencies receive their water supply from local groundwater, groundwater desalination facility, surface waters, and water that is purchased from the San Diego County Water Authority.

Water supply planning for these two water agencies is completed via their respective 2015 Urban Water Management Plans (UWMP) (Sweetwater Authority 2016; Otay Water District 2015). The UWMPs assess local supply needs based on the local jurisdictions general plan land use designations and zoning codes, which are used in SANDAGs regional and local population forecasts. The proposed project would be in compliance with the City's General Plan and Zoning code, and therefore water demand of the proposed project has been already planned for in the regional water supply documents that are based on the buildout of the City (see Section XIV, Population and Housing). Thus, the water providers would have sufficient water supplies to be able to serve the proposed project, as the water supply needs to serve the site has been planned for and assessed within their respective UWMPs. Additionally, the proposed project would include water conserving landscaping along with efficient irrigation design consistent with the City's water planning efforts.

Overall, water supply impacts would be less than significant considering the local and regional water supply planning efforts and the proposed project's consistency with the assumptions utilized in those plans.

c) Less-Than-Significant Impact. See answer to Section XIX(a). The proposed project would be in compliance with the General Plan and Zoning code, and therefore wastewater demand of the proposed project has been already planned for in the City's wastewater system plans that are based on the buildout of the City. The proposed project would not result in the need for additional capacity and would have a less-than-significant impact.

d) Less-Than-Significant Impact. The City has an exclusive agreement with Pacific Waste Services for the removal, conveyance, and disposal of non-recyclable waste through the year 2031. The proposed project is anticipated to be served by the Otay Landfill, which has a remaining capacity of approximately 21.1 million cubic yards (CalRecycle n.d.a). According to California Department of Resources Recycling and Recovery (CalRecycle), based on current waste generation rates, the Otay Landfill has a cease operation date of 2030. Should the Otay Landfill not accept waste at the time of construction, the Sycamore Landfill would serve the proposed project. The Sycamore Landfill has a remaining capacity of 87.7 million cubic yards and is estimated to cease operation in 2030. Additionally, the Sycamore Landfill has a remaining capacity of 147.9 million cubic yards, with a ceased operation date of 2042 (CalRecycle n.d.b).

At this time, there is one proposed new landfill site in San Diego County with a 30-year life expectancy: the Gregory Canyon site. Additionally, an area in East Otay Mesa has been identified by the County as a tentative site (City of Chula Vista 2005). Once operational, solid waste generated by the proposed project would be limited to the waste generated by the rehabilitation facility. Since there is sufficient capacity to accommodate projected population at buildout of the General Plan, and the proposed project would not introduce a new population base, there is no significant impact to integrated waste management services (City of Chula Vista 2005). As such, the Otay Landfill would have adequate permitted capacity to accommodate the proposed project's solid waste disposal needs. Impacts would be less than significant.

e) Less-Than-Significant Impact. The project would comply with all federal, state, and local statutes and regulations related to solid waste. The proposed project would not result in the generation of large amounts of solid waste other than minimal amounts generated during the construction phase. The proposed project would not require demolition of existing structures, since none exist on site, and would therefore not generate demolition waste that would need to be disposed of at waste disposal facilities.

The City of Chula Vista requires mandatory recycling of construction and demolition debris per the CVMC - Mandatory Construction and Demolition Debris Recycling Ordinance (CMVC Section 8.25.095). Per the CVMC, construction and demolition projects must divert their waste from landfill disposal. The Mandatory Construction and Demolition Debris Recycling Ordinance requires that 100% of inert materials and a minimum of 65% of all other materials be recycled and/or reused. Regarding construction waste, the proposed project would be required to recycle/reuse 100% of the following materials: asphalt/concrete; brick/masonry/tile; dirt/rock; mixed inerts; landscape and brush clearing debris. The proposed project would also be required

to recycle/reuse 65% of the following materials: cabinets, doors, fixtures, windows; cardboard; carpet; carpet (padding/foam only); ceiling tile (acoustic); drywall (used); drywall (new, unpainted, or scrap); mixed debris (consists of a mix of any materials in this list); roofing materials; scrap metal; stucco; and unpainted wood & pallets. With the implementation of these requirements per the CVMC, the proposed project would be in compliance with state policies like the California Solid Waste Reuse and Recycling Access Act of 1991 and Assembly Bill 341 (Solid Waste Diversion). Additionally, the proposed project includes a trash and recycling enclosure for operational waste disposal. Therefore, the proposed project would be consistent with regulations related to solid waste, and impacts would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Wildfire Comments:

a) Less-Than-Significant Impact. The project site is not located within a state responsibility area or lands classified as very high fire hazard severity zones (VHFHSZ). The project site is located approximately 12.0 miles west from a VHFHSZ (City of Chula Vista 2017a). As discussed in Section IX(f), the proposed project would not conflict with the regional or city emergency response plans, and the site would have adequate emergency access. The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan and, therefore, would have a less-than-significant impact.

b) Less-Than-Significant Impact. The project site is located in a highly urbanized and developed area, and is not located within or adjacent to a fire hazard severity zone. The proposed project would be constructed in compliance with the City of Chula Vista Fire Code, and development would be adjacent to other existing developments. In addition, adequate emergency ingress/egress would be provided. The proposed project would not exacerbate wildfire risks, exposing occupants to pollutants and, therefore, would have a less-than-significant impact.

c) Less-Than-Significant Impact. While the proposed project would require the installation of water sources and other underground utilities (see Section XIX, Utilities and Service Systems), these would not exacerbate fire risks because the project site is not located with or adjacent to a VHFHSZ and these improvements would be constructed within an existing roadway and the project site. The proposed project would not require the installation or maintenance of infrastructure that would exacerbate fire risk and, therefore, would have a less-than-significant impact.

d) Less-Than-Significant Impact. The project site is located in a highly urbanized and developed area and is not located within or adjacent to a fire hazard severity zone. Due to

the site location and the surrounding developed environment, the proposed project would not be subject to downhill flooding or landslides resulting from a fire. In addition, the Updated Geotechnical Report prepared for the proposed project by Partner (Appendix D), the project site is not within a landslide zone, per the California Geological Survey 'State of California Seismic Hazards Zone" map. The proposed 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. Therefore, impacts would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. THRESHOLDS				
Will the proposal adversely impact the City's Threshold Standards?				
a) Library The City shall construct 60,000 gross square feet (GSF) of additional library space, over the June 30, 2000 GSF total, in the area east of Interstate 805 by buildout. The construction of said facilities shall be phased such that the City will not fall below the city-wide ratio of 500 GSF per 1,000 population. Library facilities are to be adequately equipped and staffed.	☐	☐	☒	☐
b) Police i. Emergency Response: Properly equipped and staffed police units shall respond to 81 percent of "Priority One" emergency calls within seven (7) minutes and maintain an average response time to all "Priority One"	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
emergency calls of 5.5 minutes or less.				
ii. Respond to 57 percent of "Priority Two" urgent calls within seven (7) minutes and maintain an average response time to all "Priority Two" calls of 7.5 minutes or less.	☐	☐	☒	☐
c) Fire and Emergency Medical Emergency response: Properly equipped and staffed fire and medical units shall respond to calls throughout the City within 7 minutes in 80% of the cases (measured annually).	☐	☐	☒	☐
d) Traffic The Threshold Standards require that all intersections must operate at a Level of Service (LOS) "C"" or better, with the exception that Level of Service (LOS) "D" may occur during the peak two hours of the day at signalized intersections. Signalized intersections west of I-805 are not to operate at a LOS below their 1991 LOS. No intersection may reach LOS "E" or "F" during the average weekday peak hour. Intersections of arterials	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
with freeway ramps are exempted from this Standard.				
e) Parks and Recreation Areas The Threshold Standard for Parks and Recreation is 3 acres of neighborhood and community parkland with appropriate facilities/1,000 population east of I-805.	☐	☐	☒	☐
f) Drainage The Threshold Standards require that storm water flows and volumes not exceed City Engineering Standards. Individual projects will provide necessary improvements consistent with the Drainage Master Plan(s) and City Engineering Standards.	☐	☐	☒	☐
g) Sewer The Threshold Standards require that sewage flows and volumes not exceed City Engineering Standards. Individual projects will provide necessary improvements consistent with Sewer Master Plan(s) and City Engineering Standards.	☐	☐	☒	☐
h) Water The Threshold Standards require that adequate storage, treatment, and transmission facilities are constructed concurrently with	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
planned growth and that water quality standards are not jeopardized during growth and construction. Applicants may also be required to participate in whatever water conservation or fee off-set program the City of Chula Vista has in effect at the time of building permit issuance.				

Thresholds Comments:

a) Less-Than-Significant Impact. The proposed project would not introduce a new population base; thus, the proposed project would not conflict with the City's threshold regarding library services, resulting in a less-than-significant impact.

b) (i)(ii) Less-Than-Significant Impact. The proposed project would not negatively impact existing police response times to the project area, as the project site is located within an area surrounded by existing development, which is already served by law enforcement. Impacts would be less than significant.

c) Less-Than-Significant Impact. The proposed project would not negatively impact existing fire or emergency response times to the project area, as the project site is located within an area surrounded by existing development, which is already served by fire and emergency response personnel. Impacts would be less than significant.

d) Less Than Significant with Mitigation Incorporated. Refer to Section XVII, Transportation. Impacts would be less than significant with mitigation incorporated with the inclusion of mitigation measures MM-TRA-1.

e) Less-Than-Significant Impact. The proposed project would not introduce a new population base; thus, the proposed project would not conflict with the City's threshold regarding parks and recreation areas, resulting in a less-than-significant impact.

f) Less-Than-Significant Impact. Refer to Section X, Hydrology and Water Quality. Impacts would be less than significant.

g) Less-Than-Significant Impact. Refer to Section XIX. Impacts would be less than significant.

H) Less-Than-Significant Impact. Refer to Section XIX. Impacts would be less than significant.

Mitigation: Refer to mitigation measures identified above and in Section XXIII.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXII. 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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐

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

Mandatory Findings of Significance Comments:

a) Less Than Significant with Mitigation Incorporated. As discussed in Section IV, Biological Resources, construction of the proposed project would potentially result in significant impacts to biological resources. However, with incorporation of MM-BIO-1 and MM-BIO-2, potentially significant impacts would be reduced to a level below significance. As discussed in Section V, Cultural Resources, and Section VII, Geology and Soils, potential impacts regarding inadvertent discovery of cultural and paleontological resources could occur during excavation. However, implementation of MM-CUL-1, MM-CUL-2, and MM-GEO-1 would ensure that impacts would be less than significant. Overall, impacts would be less than significant with the incorporation of mitigation.

b) Less Than Significant with Mitigation Incorporated. As provided in the analysis presented above, the proposed project would not result in significant impacts to aesthetics, agriculture and forestry resources, air quality, greenhouse gas emissions, energy, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation and traffic, utilities and service systems, and wildfire. Mitigation measures recommended for biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources would reduce impacts to below a level of significance.

The proposed project would incrementally contribute to cumulative impacts for projects occurring within the City. With mitigation, however, implementation of the proposed project would not result in any residually significant impacts that could contribute to a cumulative impact. In the absence of residually significant impacts, the incremental accumulation of effects would not be cumulatively considerable and would be less than significant.

c) Less Than Significant with Mitigation Incorporated. Based on the analysis above, it has been determined that there would be no significant direct or indirect effect on human beings with the incorporation of mitigation.

Mitigation: Refer to migration measures identified above and in Section XXIII.

XXIII. MITIGATION MEASURES

Project mitigation measures are indicated above.

XXIV. AGREEMENT TO IMPLEMENT MITIGATION MEASURES

By signing the line(s) provided below, the Applicant(s) and/or Operator(s) stipulate that they have each read, understood and have their respective company's authority to and do agree to the mitigation measures contained herein, and will implement same to the satisfaction of the Environmental Review Coordinator. Failure to sign the line(s) provided below shall indicate the Applicants' and/or Operator's desire that the proposed project be held in abeyance without approval.

_____

Printed Name and Title of Authorized Representative of
[Property Owner's Name]

_____ _____

Signature of Authorized Representative of Date
[Property Owner's Name]

_____

Printed Name and Title of
[Operator if different from Property Owner]

_____ _____

Signature of Authorized Representative of Date
[Operator if different from Property Owner]

H. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

I. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project **could not** have a significant effect on the environment, and a **Negative Declaration** will be prepared.

☒ I find 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 proposed project have been made or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

☐ I find that the proposed project **may** have a significant effect on the environment, and an **Environmental Impact Report** is required.

☐ I find that the proposed project **may** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **Negative Declaration** pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **Negative Declaration**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

[Name] Date
[Title]
City of Chula Vista

J. REFERENCES

APD Consulting, Inc. 2021. Encompass Health Chula Vista Rehabilitation Hospital, DR 19-0028, CUP 19-0028. Civil Plan Set.

Boulder Associates, Inc. 2021. Encompass Health Chula Vista Rehabilitation Hospital, DR 19-0028, CUP 19-0028. Architectural Plan Set.

CalRecycle (California Department of Resources Recycling and Recovery). n.d.a. "Facility/Site Summary Details: Otay Landfill." Accessed March 2020. https://www2.calrecycle.ca.gov/swfacilities/Directory/37-AA-0010.

CalRecycle. n.d.b. "Facility/Site Summary Details: Sycamore Landfill." Accessed March 2020. https://www2.calrecycle.ca.gov/swfacilities/Directory/37-AA-0023.

Caltrans (California Department of Transportation). 2013a. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. September 2013.

Caltrans. 2013b. *Transportation and Construction Vibration Guidance Manual*. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. Sacramento, California. September 2013.

CARB (California Air Resources Board). 2017. *The 2017 Climate Change Scoping Plan Update*. January 20. 2017. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CDFG (California Department of Fish and Game). 2012. *Staff Report on Burrowing Owl Mitigation*. March 7, 2012. Accessed July 28,2020. http://www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf.

City of Chula Vista 2003. *Multiple Species Conservation Program Subarea Plan*. February 2003.

City of Chula Vista 2005a. *Chula Vista 2020: General Plan Update Environmental Impact Report*. December 2005. Accessed July 2018. http://www.chulavistaca.gov/home/showdocument?id=11971.

City of Chula Vista 2005b. *2004 Drainage Master Plan.* February 2005. Accessed January 14, 2021. https://www.chulavistaca.gov/departments/engineering/drainage-master-plan

City of Chula Vista 2014. *Wastewater Collection System Master Plan.* May 2014. Accessed January 14, 2021. https://www.chulavistaca.gov/departments/public-works/master-plans/wastewater-master-plan

City of Chula Vista 2017a. *Chula Vista Vision 2020 General Plan*. Adopted December 13, 2005. Amended December 5, 2017. Accessed July 2018. http://www.chulavistaca.gov/departments/development-services/planning/general-plan.

City of Chula Vista. 2017b. *Chula Vista Climate Action Plan*. Adopted September 2017. http://www.chulavistaca.gov/home/showdocument?id=15586.

City of Chula Vista. 2019. *Best Management Practices (BMP) Design Manual*. Updated March 2019. Accessed March 2020. https://www.chulavistaca.gov/departments/public-works/services/storm-water-pollution-prevention/documents-and-reports.

City of Chula Vista. 2020. Chula Vista Municipal Code. Updated February 25, 2020. https://chulavista.municipal.codes/CVMC.

City of Chula Vista 2021. Development Impact Fees (City Website). Accessed January 14, 2021. https://www.chulavistaca.gov/departments/development-services/how-much-will-your-permit-cost/development-impact-fees

City of Chula Vista. N.d. Fire Department. Accessed March 2020. https://www.chulavistaca.gov/departments/fire-department/stations-locations/fire-stations-map.

County of San Diego. 2007. *Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality. Department of Planning and Land Use, Department of Public Works*. March 19, 2007.

Deméré, T.A. and S.L. Walsh. 1993. Paleontological Resources, County of San Diego. Prepared for the San Diego Planning Commission, pp. 1–68. Revised 07 April 2003.

DOC. 2016. San Diego County Important Farmland 2016, Sheet 1 of 2. May 2018.

FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model (RCNM), Software Version 1.1. U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division. Washington, D.C. December 2008.

FHWA. 2011. *Highway Traffic Noise: Analysis and Abatement Guidance*. FHWA-HEP-10-025. Accessed March 2020. Https://www.fhwa.dot.gov/Environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/.

FEMA (Federal Emergency Management Agency). 2012a. Flood Insurance Rate Map 0673C2157G. May 2012.

FEMA. 2012b. Flood Insurance Rate Map 0673C2156G. May 2012.

FTA (Federal Transit Administration). 2006. *Transit Noise and Vibration Impact Assessment*. Final Report. FTA-VA-90-1003-06. May 2006.

Office of Historic Preservation. 1995. Instructions for Recording Historical Resources. Accessed July 31, 2020. http://scic.org/docs/OHP/manual95.pdf.

OPR (California Governor's Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December 2018. Accessed March 2020. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Otay Water District. 2015. *2015 Urban Water Management Plan Update*. June 2016. Prepared by CH2M HILL Engineers Inc. San Diego, California: CH2M HILL Engineers Inc.

Ridge Landscape Architects. 2021. Encompass Health Chula Vista Landscape Plan.

SANDAG (San Diego Association of Governments). 2002. *Brief Guide of Vehicular Trip Generation Rates for the San Diego Region*. April 2002.

SANDAG. 2015a. S*an Diego Forward: The Regional Plan*. October 2015. Accessed March 2020. http://www.sdforward.com/pdfs/RP_final/The%20Plan%20-%20combined.pdf.

SANDAG. 2015b. SB743 Concept Map for the SANDAG Region. Accessed March 2020. http://sandag.github.io/sb743/sb743_concept_map_employee.htm

SANDAG. 2017. *Series 13: 2050 Regional Growth Forecast.* Accessed March 2020. http://www.sandag.org/index.asp?classid=12&projected104=84&projected=503&fuseaction=projects.detail.

San Diego County Regional Airport Authority. 2010. *Brown Field Municipal Airport Land Use Compatibility Plan.* Adopted January 25, 2010. Amended December 20, 2010. Accessed March 2020. http://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&EntryId=2982&language=en-US&PortalId=0&TabId=225.

SANTEC (San Diego Traffic Engineers Council)/ITE (Institute of Transportation Engineers). 2000. *Guidelines for Traffic Impact Studies in the San Diego Region*. March 2, 2000.

SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook.*

SDRWQCB (San Diego Regional Water Quality Control Board). 2016. *San Diego Bay Watershed Management Area Water Quality Implementation Plan*. February 2016.

Secretary of the Interior. n.d. Secretary of the Interior's Standards and Guidelines. Accessed July 31, 2020. https://www.nps.gov/history/local-law/arch_stnds_9.htm.

Sweetwater Authority. 2016. *2015 Urban Water Management Plan*. June 27, 2016.

K. APPENDICES

A. Air Quality and Greenhouse Gas Emissions Analysis Technical Report (November 11, 2020)

B. Biological Letter Report (December 7, 2020)

C. Negative Cultural Resources Report (March 2020)

D. Updated Geotechnical/Geologic Investigation Report (April 15, 2019)

E. Paleontological Resources Inventory Report (January 2021)

F. Phase I Environmental Assessment Report (January 16, 2018)

G. Phase II Subsurface Investigation Report (August 29, 2018)

H. Preliminary Drainage Report (November 12, 2020)

I. Priority Development Stormwater Quality Management Plan (July 21, 2020)

J. Noise Technical Report (November 11, 2020)

K. Local Mobility Analysis (November 9, 2020)

L. Vehicle Miles Traveled Analysis (July 21, 2020)

M. Sewer Report (November 12, 2020)