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November 3, 2023

**California Environmental Quality Act (CEQA) Initial Study – Environmental Checklist Form**
**(Based on the State CEQA Guidelines, Appendix G)**

1. Title:

   Pediatric Mental and Behavioral Health Campus (MBH) Project

2. Lead agency name and address:

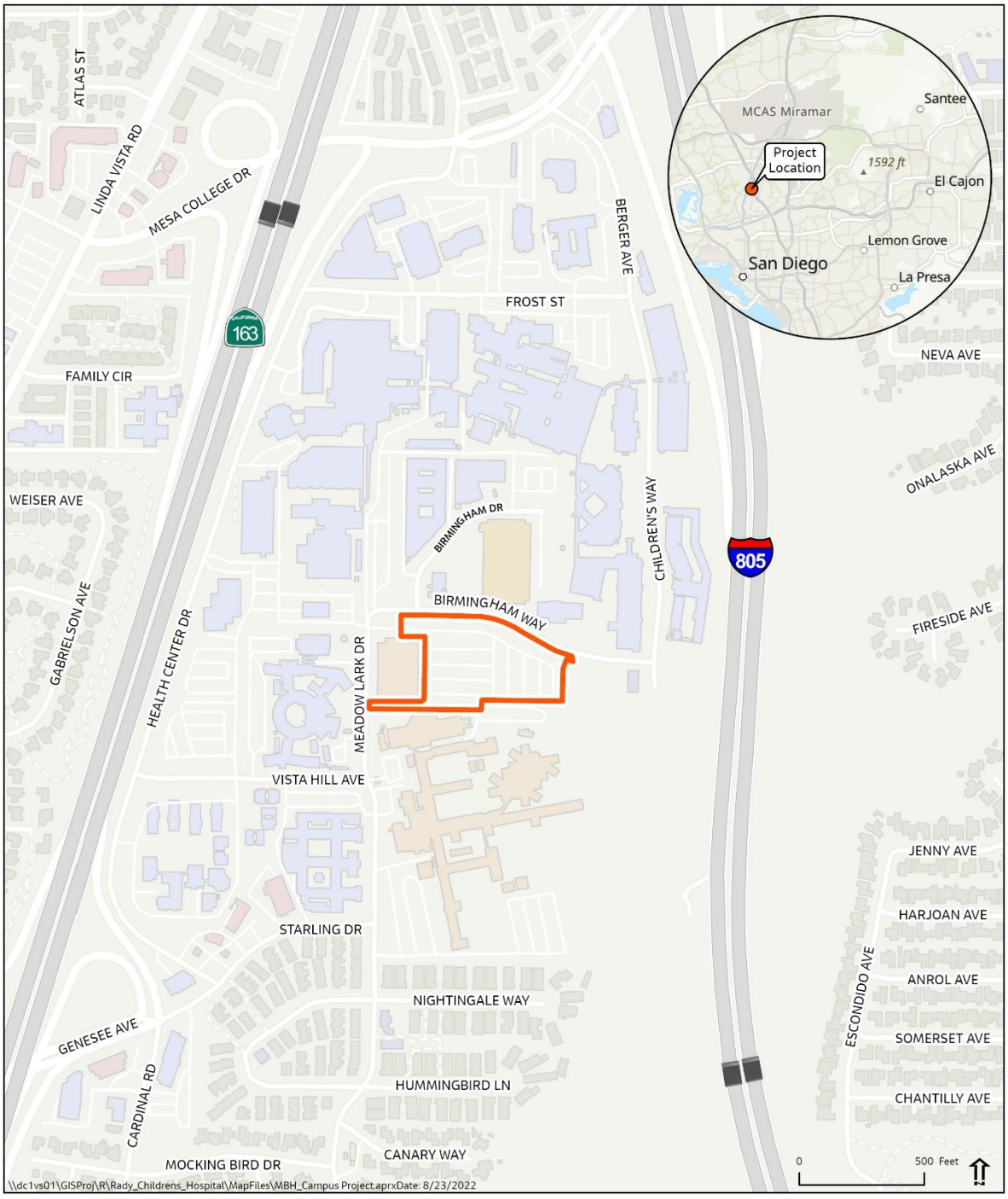
   County of San Diego, Department of General Services
   5560 Overland Avenue, Suite 410
   San Diego, CA 92123

3. a. Contact: Melanie Tylke, Project Manager
   b. Phone number: (619) 616-9326
   c. E-mail: melanie.tylke@sdcounty.ca.gov

4. Project Location

   The Project site is located on Birmingham Way east of Meadow Lark Drive (Assessor Parcel Numbers [APNs] 427-550-3200 and 427-530-1200). The Project site is County of San Diego-owned land within the City of San Diego, south of the Interstate (I)-805 and State Route (SR) 163 interchange in the Serra Mesa Community (Figure 1). The 4.35-acre Project site is located along Birmingham Way on the San Diego Youth Transition Campus (YTC)—formerly the Juvenile Justice Center (JJC)—and is adjacent to the Rady Children's Hospital-San Diego (RCHSD) and Sharp Memorial Hospital campuses. The site is currently accessible only from Meadow Lark Drive on the west.

**Figure 1: Regional Map**




Project Site Boundary

Pediatric Mental and Behavioral Health Campus
Regional Map

5. Project applicant name and address:
   County of San Diego
   Department of General Services
   5560 Overland Avenue, Suite 410
   San Diego, CA 92123

6. General Plan
   Community Plan: Serra Mesa
   Regional Category: Not applicable (N/A)
   Land Use Designation: Institutional & Public and Semi-Public Facilities
   Density: N/A
   Floor Area Ratio (FAR): 1.5

7. Zoning
   Use Regulation: RS 1-7
   Minimum Lot Size: N/A
   Special Area Regulation N/A

8. Description of Project

The proposed Project (Project) is a Ground Lease and Operating Agreement enabling the construction and operation of a Pediatric MBH Campus, a joint initiative between the County of San Diego and RCHSD. Most of the Project site consists of a paved surface parking lot located on the YTC, although a small portion consists of a landscaped area between the parking lot and Birmingham Way (Figure 2).

**Project Background**

The Pediatric MBH Project site is included in the site boundary for the YTC (former JJC) Redevelopment Project which was analyzed in a Mitigated Negative Declaration (MND) prepared by the County of San Diego (County) and adopted on August 7, 2018 (State Clearinghouse [SCH] No. 2018041024; Project No. 1021131). The YTC Redevelopment Project consists of the redevelopment and reorganization of the YTC on a 31.5-acre site, including the Pediatric MBH Project site. The YTC Redevelopment Project MND concluded that impacts related to biological resources, cultural resources, greenhouse gas emissions, land use/planning, noise, transportation/traffic, tribal cultural resources, and mandatory findings of significance would be potentially significant unless mitigated. Less than significant impacts or no impacts would occur to the remaining resource topic areas that were analyzed. The YTC Redevelopment Project was proposed in multiple phases; Phase 3 includes demolition of the existing Juvenile Probation Center and construction of a new Juvenile Probation Center immediately south of the Pediatric MBH Project site boundary. That activity has not yet occurred. No other YTC Redevelopment Project activities on or adjacent to the Pediatric MBH Project site were considered in that MND, and the Pediatric MBH Project was not identified as a component of the YTC Redevelopment Project.

**Figure 2: Existing Conditions Map**


Project Site Boundary

Pediatric Mental and Behavioral Health Campus
Existing Conditions Map

Imagery Source:
San Diego Association Of Governments (Sandag) 2020

**Project Components**

The Pediatric MBH Project would provide child and adolescent mental and behavioral health services. The Project would result in the expansion of the existing County child and adolescent psychiatric inpatient services and outpatient programs. The Pediatric MBH Project would offer the complete spectrum of care that includes an acute psychiatric hospital, a crisis stabilization unit, and outpatient transitional services.

The Project consists of the following components (Figure 3):

- Two new patient care buildings
- One new parking structure
- Two new driveways on Birmingham Way
- Service access, service yard, and fire lanes
- Roadway improvements along Birmingham Way
- Utility improvements to connection points within Birmingham Way

The key Project components are described in more detail below.

**Figure 3: Site Map**

Buildings

The Project includes construction of two new patient care buildings totaling approximately 93,000 square feet (SF). These are the Outpatient Psychiatric Clinic and the Inpatient Acute Psychiatric Hospital. The Proposed structures would not exceed 75 feet in height.

The approximately 11,000-SF Outpatient Psychiatric Clinic would provide outpatient services, administration and academic services, clinical ancillary services, and facility support services. It is expected to serve approximately 72 patients per day in two 36-patient blocks. The facility would be constructed on the north-central area of the Project site and would be a one-story building.

The approximately 82,000-SF Inpatient Acute Psychiatric Hospital would include the Acute Psychiatric Unit and the Crisis Stabilization Unit with a combined total of 84 beds. The Acute Psychiatric Hospital would include up to 60 beds, all in private rooms and in five 12-bed neighborhoods. These include 36 low-acuity beds and 24 high-acuity beds. The Crisis Stabilization Unit within the hospital would include 24 beds in two 12-bed neighborhoods. Each 12-bed neighborhood would have eight private rooms and four open bays for patients. It would have a secure vehicular sallyport to provide a secure entry for patients arriving by ambulance or law enforcement, and a separate pedestrian sallyport for patients arriving with their parents or a guardian. This building would be constructed on the eastern portion of the Project site and would be a four-story building.

Parking Structure

A new, up to approximately 369,000-SF, 11-level, including a partial height basement level (approximately 5 feet below final grade), open-air parking structure would be constructed at the southwestern corner of the Pediatric MBH Project site. The parking structure would have up to approximately 900 parking spaces, which would be an increase of 459 spaces over the existing 441 spaces on the portion of the paved surface parking lot that is within the Project site boundary. This parking lot would be removed to allow construction of the Pediatric MBH Project. The new Parking Structure would have three entrance/exits located in the southeastern, northeastern, and southwestern corners of the parking structure and would not exceed 117 feet in height.

The parking structure would serve both the proposed Pediatric MBH Project and the existing County's Juvenile Court and Juvenile Probation Center. The parking areas for Court users and Probation Center users would be physically separated from the parking areas for the Pediatric MBH users. Court users and Probation Center users would use the southwestern entrance to the Parking Structure, which would be controlled to limit access to those users. Pediatric MBH users would use the southeastern and northwestern entrances.

Because of security concerns of the adjacent YTC, the parking structure would include wall screening to block lines of sight between the structure and YTC facilities.

Site Access Driveways

Current vehicle access to the existing surface parking lot is from Meadow Lark Drive on the west via two driveways, one located on each side (north and south) of the County's Juvenile Probation Building. The Project would not include the existing northern driveway. The southern driveway on Meadow Lark Drive would be reconfigured within the existing curb cut to provide access to the southwestern entrance of the new parking structure to serve Court and Probation Center users. Depending on final design, the southern driveway may be confined to Court and Probation Center users only, or may also be made available for Pediatric MBH users to access the southeastern entrance of the new parking structure. Two new driveways would be constructed on Birmingham Way for site access, one on the northwestern corner of the Project site and the other located at the northeast end of the Project site. The northwestern driveway would provide access to the northwestern parking structure entrance/exit for Pediatric MBH users. The northeastern driveway would be for Pediatric MBH service and emergency vehicles and access to the hospital secured, controlled entrance. Site access would be designed to comply with City of San Diego Fire Department access requirements. Table 1 summarizes the site access and users of the driveways.

**Table 1. Site Access and Users**

| Driveway | Existing or Proposed | Provides Access To | Users |
|---|---|---|---|
| Northern on Meadow Lark Drive | Existing | Juvenile Probation Building (not part of Pediatric MBH Project) | Probation users |
| Southern on Meadow Lark Drive | Existing | Parking structure southwestern entrance/ exit only, or may also include access to southeastern entrance/exit | Court and Probation users only (southwestern entrance/exit), or may also include Pediatric MBH patients and visitors (southeastern entrance/exit) |
| Northwestern on Birmingham Way | Proposed | Parking structure northwestern entrance/exit | Pediatric MBH patients and visitors |
| Northeastern on Birmingham Way | Proposed | Parking structure southeastern entrance/exit | Pediatric MBH service and emergency vehicles |

Birmingham Way Roadway Improvements

The following offsite circulation improvements are proposed along Birmingham Way on the north side of the Project site within the City of San Diego-owned right-of-way (ROW):

- Provision of dedicated right-turn lanes into each of the two new Project driveways along Birmingham Way (i.e., the northwestern and northeastern driveways)
- Provision of a dedicated left-turn lane into the northwestern driveway, opposite Birmingham Drive
- Construction of new curb, sidewalk, and patient drop-off area along Birmingham Way between the two driveways

These improvements may include removal of existing pavement and new sidewalks and landscaping along Birmingham Way, as well as restriping. These improvements would conform to the City of San Diego Standards.

Utilities

San Diego Gas and Electric (SDG&E) would supply power to the Project site. Emergency power for the Pediatric MBH Project would be provided by a new generator that would be installed on the Project site. The generator would be installed in an exterior sound-attenuated fashion to provide additional sound attenuation beyond that provided by a standard enclosure.

Water for domestic and fire use would be provided by the City from the existing 12-inch water main in Birmingham Way. Two new fire hydrants would be installed on the Project site in accordance with City requirements. The new fire hydrants would be located in the western portion of the Project site between the parking structure and the Outpatient Psychiatric Clinic and in the southern portion of the Project site between the parking structure and Inpatient Acute Psychiatric Hospital.

Sanitary sewer lines installed for the Pediatric MBH Project would be connected to the existing City sewer system via a tie-in to the existing sewer line located within Children's' Way east of the RCHSD Acute Care Pavilion at a location northeast of the Pediatric MBH Project. A sewage pump would be needed to accommodate the elevation difference between the Project site and the existing sewer infrastructure. It would be installed near the mechanical room of the Inpatient Acute Psychiatric Hospital.

New stormwater drains would be connected to the existing storm drain system along Birmingham Way. Although the street elevation is higher than the Pediatric MBH site, the existing storm drain line in the street is lower than the Pediatric MBH site, and it is anticipated that a pump would not be required for this connection. Stormwater runoff would be collected and treated by use of features such as biofiltration basins or modular wetlands to comply with City of San Diego Stormwater Standards before conveyance to the City system and would not be discharged directly offsite into the natural drainage to the east of the Project site. The stormwater treatment systems would also detain and control release of runoff of stormwater during heavy storm events. The Project site is

primarily an impervious paved surface. The Pediatric MBH Project would incorporate landscaped areas that would result in some reduction in impervious surfaces on the Project site.

**Construction Activities**

The pavement of the portion of the existing surface parking lot within the Project site boundary (approximately 116,000 SF) would be removed to allow for the construction of the Project components described above. An existing retaining wall along the east side of the parking lot would remain.

Other site preparation and demolition activities would include:

1. Soil removal as required for construction of lower-level parking and retaining walls along the light wells around the Parking Structure

2. Removal of existing trees and vegetation (landscaped areas)

3. Relocation of existing underground domestic water, fire water, stormwater, and sanitary sewer connections that serve existing buildings on the YTC site and that would conflict with the construction of the Pediatric MBH site

4. Trenching (approximately 600 linear feet) would be required in Birmingham Way and Children's Way to install the offsite sewer line connection.

Construction of the Project is expected to take 24 to 30 months. Construction would begin with demolition of the surface parking lot and is expected to start in 2024.

**Operations**

The Pediatric MBH is expected to have a total of approximately 80 to 90 staff. The Outpatient Psychiatric Clinic is expected to serve approximately 72 patients per day split approximately evenly between morning and afternoon patient blocks. The Inpatient Acute Psychiatric Hospital would accommodate overnight patients not to exceed the total of its 84-overnight-bed capacity. Up to approximately 168 visitors are expected daily during visiting hours between 6 p.m. to 8 p.m.

1. Surrounding land uses and setting:

   The 4.35-acre Pediatric MBH Project site is bordered by Birmingham Way on the north, open space that is part of the City's multi-habitat planning area (MHPA) to the east, County Juvenile Court and Girls Rehabilitation Center (part of the YTC) to the south, and the County Juvenile Probation building to the west. Sharp Memorial Hospital parking structures and the RCHSD Specialty Clinic are located on the north side of Birmingham Way across from the site. The surrounding land uses are zoned as commercial, commercial neighborhood, residential, and open space (CO-1-2, CN-1-2, RM-2-5, RM-4-10, and OR-1-1).

The Project site consists entirely of the majority of a paved surface parking lot on the YTC property owned by the County and that is currently used by County Juvenile Court and Probation users. The Project site boundary includes an approximately 10-foot-wide landscaped area between the parking lot and Birmingham Way that is owned by the City of San Diego (City). Current vehicle access to the parking lot is from Meadow Lark Drive on the west via two driveways, one located on each side of the County's Juvenile Probation Building. Currently, the parking lot has no access from Birmingham Way.

The Project boundary includes offsite areas within Birmingham Way and Children's Way where temporary disturbance associated with the underground installation of sewer lines would occur. The temporary impact area shown on Figure 3 is intended to encompass the maximum area within which construction activities associated with installation of the underground utilities would occur. The actual construction footprint would be a smaller area within the temporary impact boundary.

2. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) is shown in Table 2.

**Table 2. Permits, Approvals and Agreements Needed for the Project**

| Permit Type/Action | Agency |
|---|---|
| Ground Lease and Operating Agreement | County of San Diego |
| Grading Permit | County of San Diego |
| Building Permits | County of San Diego |
| Landscape Plans | County of San Diego |
| Right of Way Permits | City of San Diego |
| General Construction Stormwater Permit | Regional Water Quality Control Board |
| Water District Approval | City of San Diego |
| Sewer District Approval | City of San Diego |
| Fire District Approval | City of San Diego |
| Health Care Access and Information Permits | Department of Health Care Access and Information |

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

☒ **YES** ☐ **NO**

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

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

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

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

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

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

10/31/2022

Signature Date

Marko Medved, P.E., C.E.M Director, Department of General Services

Print Name Title

## INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were

incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

7. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significance

## I. AESTHETICS. Would the Project:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

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

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

**No Impact:** A scenic vista is defined as views of both natural lands and developed areas that provide an expansive view of a highly valued landscape for the benefit of the general public. The Project site is in an urban infill location, and no scenic vistas are designated for protection by federal, State, or local governments within the Project vicinity. Therefore, the Project would not result in adverse project or cumulative impacts on a scenic vista.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans 2019). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

**No Impact:** The Project is located within the City of San Diego in a highly urbanized area and is not located near or adjacent to any designated state scenic highways

(Caltrans 2016). The nearest designated State scenic highway is a portion of State Route 52 more than 5 miles to the northeast of the Project site. The nearest eligible State scenic highway is Interstate 8 (I-8), which is approximately 2 miles south of the Project site (Caltrans 2019). Given the distance and considering the screening effects of intervening topography, vegetation, and development, no impacts to scenic resources within a State scenic highway would occur as a result of Project implementation.

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?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

**Less than Significant Impact:** The Project site is in an urbanized area. The City of San Diego Municipal Code and General Plan, as well as the Serra Mesa Community Plan, contain regulations, goals, and policies related to scenic quality (City of San Diego 2017a). Although these are the plans that cover the Project site and surrounding areas, they do not apply to this County project. However, the Project design would be consistent with the City General Plan Urban Design Element policies UD-A.11 and UD-A.12 that call for reducing the amount and visual impact of surface parking lots and by providing a parking structure instead of a surface parking lot. The Pediatric MBH Campus would not be out-of-scale with development in the surrounding area which includes the YTC, hospital buildings, and parking structures. The change in visual character would be compatible with the Project area and would not impact any public views.

Construction and demolition activities, such as stockpiling, use of construction equipment, removal of landscaped areas, and the accumulation of debris may be temporarily visible from adjacent streets and surrounding structures with views toward the proposed Project area. Construction and demolition activities would be temporary, occurring for approximately 24 to 30 months, and would not substantially degrade the existing visual character. Impacts would be less than significant and cease upon completion of construction.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Implementation of the Project would result in new sources of light and glare both during construction and upon completion of the Project. Although the Project site is within the San Diego city limits, it is County-owned property. Per San Diego Municipal Code Section 142.0740(g), outdoor lighting on facilities or land owned, operated, controlled, or protected by the County of San Diego is not subject to City of San Diego ordinances and is exempt from the City's lighting ordinance requirements. However, because of the adjacent MHPA, City Land Use Adjacency Guidelines addressing lighting in areas adjacent to the MHPA, as discussed in Section IV b), would be implemented and would reduce impacts from lighting consistent with City requirements.

Impacts of new light and glare sources associated with construction are limited by their nature because they would be temporary and discontinued upon completion of construction. The Project is expected to be constructed over an approximate period of 24 to 30 months, after which these sources of light and glare would be discontinued. To the extent feasible, Project construction would be limited to daytime hours, further reducing the impacts of temporary lighting, which would be less than significant.

The Project is limited within an existing paved parking lot that currently generates a substantial amount of light and glare with the associated overhead lighting fixtures. Neighboring facilities include the YTC and hospitals which contain light and glare sources that would be consistent with the proposed Project. The construction of two new patient care buildings and a parking structure on the site may result in a net increase in the amount of permanent facility lighting required. However, considering the location of the Project in a highly urbanized part of the City of San Diego, new facility lighting would not be out of scale with surrounding development and would represent an incremental increase in the total amount of lighting used in the vicinity. The Pediatric MBH Campus would be surrounded by similar structures that have similar amounts of permanent lighting.

Exterior paint colors and materials used to construct the Project would be non-reflective. No exposed metal or other materials are proposed that could result in a substantial amount of glare. Given the minimal use of glare-inducing materials in the designs of the various proposed facilities, impacts would be less than significant.

## II. AGRICULTURE AND FORESTRY RESOURCES -- Would the Project:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site, including any offsite improvements, is in an existing urban and built environment and does not include any lands identified as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance, as shown on maps prepared pursuant to Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation (2016). The California Department of Conservation FMMP identifies the Project area as “urban and built-up land.” “Urban and built-up land” is defined as land with man-made structure or buildings that may be used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. The Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance; therefore, there would be no impact to farmlands.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site, including any offsite improvements, is in an urban and built environment, does not contain any land uses zoned for agricultural use, and is not under a Williamson Act contract; therefore, there would be no impact.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site, including any offsite improvements, is in an urban and built environment; does not contain any land uses zoned for forest land, timberland, or timberland production; and would not conflict with existing zoning or require rezoning of forest land, timberland, or timberland production zones; therefore, there would be no impact.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site, including any offsite improvements, is not within or adjacent to any forest land and would not result in the loss of forest land or call for the conversion of forest land to non-forest use; therefore, there would be no impact.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site is located within an existing paved parking lot and would not require the conversion of any lands. No farmland or agricultural resources are present in the Project area; therefore, no impact would occur.

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

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The San Diego Air Pollution Control District (SDAPCD) prepared the Regional Air Quality Strategy (RAQS) that addresses State requirements, pursuant to the California Clean Air Act (CCAA) of 1998 and identifies feasible emission control measures and progress toward attaining State ozone standards (SDAPCD 2016). The RAQS relies on the San Diego Association of Governments (SANDAG) growth Projections which are based on population, vehicle trends, and land use plans developed by the City or County as part of their general plans. The State Implementation Plan (SIP) includes strategies to be used to attain and maintain air quality standards in the County pursuant to the CCAA (City of San Diego 2016a). The SIP includes strategies to be used to attain and maintain *federal* air quality standards. Under the SIP, SDAPCD has prepared the Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (CARB 2021). The California Air Resources Board (CARB) mobile source emission Projections and SANDAG growth Projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, Projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS. The Project is consistent with the City of San Diego General Plan designations of Institutional & Public and Semi-Public Facilities and the Serra Mesa Community Plan that incorporates the Project site as part of the Serra Mesa Health-Institutional Complex (City of San Diego 2017a). The Project would not increase population or vehicle trips over the current assumptions used to develop the RAQS and SIP, and would not conflict or obstruct their implementation. In addition, the operational emissions from the Project are below the screening levels and subsequently would not violate ambient air quality standards; therefore, impacts would be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** San Diego County is presently in nonattainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone ($O_3$). San Diego County is also presently in nonattainment for the annual geometric mean and for the 24-hour concentrations of particulate matter less than or equal to 10 microns ($PM_{10}$) under the CAAQS. $O_3$ is formed when volatile organic compounds (VOCs) and nitrogen oxides ($NO_x$) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of $PM_{10}$ in both urban and rural areas include: motor vehicles, wood-burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Air quality emissions associated with the Project include emissions of $PM_{10}$, $NO_x$, and VOCs from construction/grading activities, and also as the result of increase of traffic from project implementation. However, grading operations associated with the construction of the Project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, localized, and temporary, resulting in $PM_{10}$ and VOC emissions below the screening-level criteria established by the County guidelines for determining significance. The vehicle trips generated from the Project would result in 779 average daily trips (ADTs) (Linscott, Law and Greenspan 2022a). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the County guidelines for determining significance (BAAQMD 1999).

Pollutant emission calculations related to project construction activities include emissions from on-road vehicles and off-road equipment utilized during construction and fugitive particulate matter emissions resulting from earthmoving activities and vehicle travel. Long-term emissions associated with the Project include vehicle trips generated by the operation of the Project, energy utilized to operate the new buildings, and waste generated by the newly constructed buildings.

Construction of the proposed Project is expected to begin in 2024 and would take approximately 24 to 30 months to complete. At this time, detailed construction information is not available; therefore, default information provided in the California Emissions Estimator Model (CalEEMod), version 2020.4.0 was used to complete the air quality modeling. Multiple activities during project construction of the proposed Project would result in emissions of reactive organic gases (ROG), $NO_X$, $PM_{10}$, and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$), including clearing and grubbing, the use of off-road equipment, material delivery by haul trucks, worker commutes, building construction, and other miscellaneous activities. Ozone precursor emissions of ROG and $NO_X$ would be associated primarily with exhaust from construction equipment, haul truck trips, and worker trips. ROG emissions would also be generated during paving. Fugitive $PM_{10}$ and $PM_{2.5}$ dust emissions would result primarily from excavation and other earth-movement activity and vary as a function of soil silt content, soil moisture, wind speed, and area of disturbance.

Maximum daily construction emissions were estimated using CalEEMod, version 2020.4.0. Air modelling output is provided in the appendix to the Greenhouse Gas Technical Report (Jacobs 2022c) in Appendix C to this checklist. Maximum daily emissions of criteria air pollutants and precursors generated by construction activity are presented in Table 3. The estimated maximum daily emissions are compared to SDAPCD air quality significance thresholds, expressed in pounds per day (lb/day).

**Table 3. Maximum Daily Construction Emissions of Criteria Air Pollutants and Precursors**

| | Maximum Daily Emissions (lb/day) | | | | | |
|---|---|---|---|---|---|---|
| **Construction Year** | **ROG** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$ Total** | **$PM_{2.5}$ Total** |
| 2024 | 3.3 | 32.4 | 28.2 | >1 | 9.0 | 5.1 |
| 2025 | 1.9 | 16.1 | 21.0 | >1 | 2.6 | 1.1 |
| 2026 | 24.4 | 16.1 | 20.7 | >1 | 2.6 | 1.1 |
| **Maximum Daily Emissions** | **24.4** | **32.4** | | **>1** | **9.0** | **5.1** |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 100 |
| *Exceeds Threshold?* | *No* | *No* | *No* | *No* | *No* | *No* |

Source: Modeling output provided in Appendix C, Greenhouse Gas Technical Report.
Note: Totals may not add exactly due to rounding.
CO = carbon monoxide
$SO_x$ = sulfur oxides

Maximum daily operation emissions were also estimated using CalEEMod, version 2020.4.0. Maximum daily emissions of criteria air pollutants and precursors generated during operation of the proposed Project are presented in Table 4. The estimated maximum daily emissions are compared to SDAPCD air quality significance thresholds, expressed in pounds per day (lb/day).

**Table 4. Maximum Daily Operation Emissions of Criteria Air Pollutants and Precursors**

| | Maximum Daily Emissions (lb/day) | | | | | |
|---|---|---|---|---|---|---|
| **Operation Category** | **ROG** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$ Total** | **$PM_{2.5}$ Total** |
| Area | 2.3 | >1 | >1 | >1 | >1 | >1 |
| Energy | 0.2 | 1.4 | 1.2 | >1 | 0.1 | 0.1 |
| Mobile | 2.3 | 2.4 | 21.5 | >1 | 5.3 | 1.4 |
| **Total Daily Emissions** | **4.8** | **3.9** | **22.8** | **0.04** | **5.4** | **1.5** |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 100 |
| *Exceeds Threshold?* | *No* | *No* | *No* | *No* | *No* | *No* |

Source: Modeling output provided in Appendix C, Greenhouse Gas Technical Report.
Note: Totals may not add exactly due to rounding.

As shown in Table 3 and Table 4, maximum daily emissions of criteria air pollutants and precursors generated by construction activities and during operation, respectively, of the proposed Project would not exceed SDAPCD air quality significance thresholds. Therefore,

emissions associated with construction activity under the proposed Project would not result in a cumulatively considerable net increase in emissions of criteria air pollutants or precursors in the Project area. Therefore, this impact would be less than significant under the proposed Project.

c) Expose sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Sensitive receptors are those which are especially sensitive to air pollutant emissions, such as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, and retirement homes (County of San Diego 2007). Sensitive receptors within one-quarter mile of the proposed Project site include the Rady Children's and Sharp Memorial Hospital facilities, along with the YTC juveniles and offsite single-family residences south of the Project area. During construction, diesel particulate matter (DPM) is an issue of concern; however, Project construction activities would be temporary, and long-term exposure to DPM would not occur. Additionally, best management practices (BMPs), such as properly tuning and maintaining construction equipment, minimizing vehicle and equipment idling time, using alternative fuels if feasible or practical, using newer model engines (higher tier), and locating staging areas as far as possible from sensitive receptors, would be implemented throughout the construction phase and would minimize exposure of nearby sensitive receptors. Site grading activities during construction would also include dust control measures required by the San Diego County Grading Ordinance Section 87.428 such as: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust; therefore, Project impacts would be less than significant.

Operation of the Project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations; and impacts would be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** During construction, odors would be generated from the use of construction vehicles or equipment; however, they would be temporary during the time of construction and the implementation of BMPs as discussed in Section III c) would minimize impacts to a less than significant level.

During operation, the Project would not add any new odor sources. As a result, the Project would not create objectionable odors affecting a substantial number of people; therefore, the impact would be less than significant.

## IV. BIOLOGICAL RESOURCES -- Would the Project:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant with Mitigation Incorporated:** A biological resources site walk was conducted on August 16, 2021. A biological resources evaluation (Jacobs 2022a) is provided in Appendix A. The proposed Project, including offsite improvements, is located entirely within an existing developed commercial-office area that features paved surfaces and landscaping. The Project site consists primarily of a paved parking lot with no vegetation. The only portion of the Project site that is not paved is an approximately 10-foot-wide area between the parking lot and Birmingham Way. This area contains landscaping vegetation. Adjacent to the Project site is a canyon within the City of San Diego Multi-Habitat Planning Area (MHPA), which is preserved in perpetuity in a natural condition (City of San Diego 2014). The federally listed threatened coastal California gnatcatcher (*Polioptila californica californica*) has the potential to occur in the adjacent MHPA; and two special status plant species, Nuttall's scrub oak (*Quercus dumosa*) and coast barrel cacti (*Ferocactus viridescens* var. *viridescens*) have been identified in the canyon area (AECOM 2017; CDFW 2021). Several special status species also have the potential to occur in this area, all of which are not within the Project limits. Any special status animal or plant species detected in the MHPA would be avoided.

The limited amount of landscaping vegetation along Birmingham Way could be used for nesting by bird species protected under the federal Migratory Bird Treaty Act (MBTA). The majority of this vegetation may be removed as part of constructing access to the Pediatric MBH Campus from Birmingham Way and for roadway improvements along Birmingham Way (e.g., new turn lanes and sidewalks). Vegetation removal conducted as part of site construction during the nesting season between February 1 and September 15 could potentially affect bird species protected by the MBTA. Implementation of Mitigation

Measure (MM) BR-1 would reduce Project impacts to biological resources to less than significant. Therefore, impact would be less than significant with the incorporation of mitigation.

**MM BR-1** Vegetation removal shall occur from September 16 through January 31, outside the breeding season for birds, as feasible. Should vegetation removal need to occur within the breeding season (February 1 through September 15), a qualified biologist[1] shall perform nesting bird surveys of all vegetation within the Project area prior to removal. At a minimum, nesting bird surveys shall include two survey efforts, (1) one survey 7 to 14 days prior to vegetation removal and (2) another no more than three days prior to vegetation removal. If MBTA-protected nests are found, no vegetation removal shall occur until (1) the nest is determined by a qualified biologist to no longer be active, or (2) the Applicant and biologist consult with the California Department of Fish and Wildlife (CDFW) regarding the appropriate buffer that should be established. The Applicant and biologist shall provide the field monitoring notes when consulting with CDFW. If nesting birds are not detected during the surveys or vegetation removal occurs outside the breeding season, then no further action is required.

[1] A qualified biologist is defined as having a bachelor's degree in biology or a closely related field with sufficient local field experience in identification of avian species.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact with Mitigation Incorporated:** The Project site, including offsite improvements, is not located within any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or U.S. Fish and Wildlife Service. A City of San Diego MHPA area is located adjacent to the Project limits of work. No Project activities would occur within the MHPA. The City of San Diego Multiple Species Conservation Plan (MSCP) requires that land uses adjacent to lands designated as MHPA be managed to ensure minimal impacts to the MHPA (City of San Diego 2021a). MM BR-2 implements MHPA Land Use Adjacency Guidelines to reduce impacts to the MHPA; implementation of MM BR-2 would reduce Project impacts to sensitive natural communities to less than significant. Therefore, impact would be less than significant with the incorporation of mitigation.

**MM BR-2** Implement the following MHPA Land Use Adjacency Guidelines:

**Drainage**. All new and proposed parking lots and developed areas must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

**Toxics.** Land uses, such as recreation and agriculture, that use chemicals or generate by-products, such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality, need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal. During construction, the contractor should install construction best management practices (BMPs) such as silt fencing, sandbags, and others to prevent potentially toxic substances from entering the MHPA area.

**Lighting**. Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with noninvasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Project design should avoid the addition of permanent lighting or nighttime construction that would require temporary lighting adjacent to the MHPA area. If lighting adjacent to the MHPA is necessary, the lighting should be shielded and focused away from the MHPA.

**Noise.** Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive

species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

To avoid impacts to sensitive avian and MBTA species, pre-construction nesting surveys would be conducted; and active nests would be identified and flagged for avoidance.

**Barriers.** New development adjacent to the MHPA may be required to provide barriers (e.g., noninvasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

**Invasives**. No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

**Grading/Land Development**. Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

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?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project, including offsite improvements, is not located within State or federally protected wetlands, including but not limited to, marsh, vernal pools, or coastal areas; and, therefore, no impact would occur.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact with Mitigation Incorporated:** The Project site is developed with only a limited area of non-native landscape vegetation. It does not contain habitat that could be used for native wildlife as a migratory corridor or as a nursery, as it is fenced and paved. The Project site is on an existing paved surface within an urban and built-up environment and is not located within any fish or wildlife habitat. MM BR-2

implements MHPA Land Use Adjacency Guidelines to reduce impacts to the adjacent MHPA. With implementation of MM BR-2, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species, established native resident, or migratory wildlife corridors or native wildlife nursery sites; therefore, the impact is less than significant with the incorporation of mitigation.

e) Conflict with any local policies or ordinance protecting biological resources, such as tree preservation policy or ordinance?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact with Mitigation Incorporated:** The Project site is developed with only limited areas of non-native landscape vegetation. It does not contain any biological resources that are protected by local policies or ordinances. The Project site is adjacent to an MHPA. The City's MSCP requires that land uses adjacent to lands designated as MHPA be managed to ensure minimal impacts to the MHPA. MM BR-2 implements MHPA Land Use Adjacency Guidelines to reduce impacts to the MHPA. With implementation of MM BR-2, the Project would not conflict with local policies or ordinances protecting biological resources. Therefore, impacts would be less than significant with the incorporation of mitigation.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact with Mitigation Incorporated:** The proposed Project is located entirely within an existing developed area. Adjacent to the Project site is a canyon within the City of San Diego MSCP MHPA (City of San Diego 2014). The MHPA Land Use Adjacency Guidelines specify that adjacent land uses be managed to ensure minimal impacts to the MHPA. These include drainage, lighting, and noise. Specifically, the MHPA Land Use Adjacency Guidelines state that the drainage of all new parking lots and developed areas must not drain directly into the MHPA (City of San Diego 2021a). The existing parking lot drains into the MHPA through drainage easements issued in the 1960s. Stormwater runoff would not be discharged directly offsite into the natural drainage located to the east of the Project site. Instead, new stormwater drains would be connected to the existing storm drain system along Birmingham Way, and the Pediatric MBH Campus

would include landscaped areas that would result in some reduction in impervious surfaces on the Project site. In addition, the MHPA Land Use Adjacency Guidelines state that lighting of all developed areas adjacent to the MHPA should be directed away or shielded from the MHPA; and adequate noise reduction measures should be incorporated to minimize noise impacts to wildlife utilization, including during the breeding season of sensitive species. MHPA Land Use Adjacency Guidelines would be implemented through MM BR-2. With implementation of MM BR-2, the Project would not conflict with the provisions of any adopted Habitat Conservation Plan; Natural Communities Conservation Plan; other approved local, regional, or state habitat conservation plan; or any other local policies or ordinances that protect biological resources; therefore, impacts would be less than significant with the incorporation of mitigation.

**V. CULTURAL RESOURCES --** Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact with Mitigation Incorporated.** A review was completed of the National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, California Points of Historic Interest, California Historical Resources Inventory Database, San Diego Register of Historic Resources, and San Diego County Local Register of Historic Resources (CHRID 2021; County of San Diego 2002; NRHP 2021; OHP 2021a, 2021b, 2021c). In addition, a review was completed of nearby CEQA Projects (County of San Diego 2018a). Based on this review, no historical resources are present within the Project site or environs. A literature search was also received from the South Coastal Information Center of the California Historical Resources Information System for the Project site and a 0.5-mile radius study area on January 10, 2022. The records search indicated two previously conducted investigations have been completed within the Project site (SD-10551, SD-17232) and 22 previously conducted investigations were completed within the 0.5-mile radius buffer. The two investigations in the Project site were conducted in 2006 (SD-10551) and 2017 (SD-17232) and covered the entirety of the Project site. Eleven previously recorded cultural resources were identified within the 0.5-mile radius study area; however, no previously recorded cultural resources are located within the Project site. The closest known historical resources to the Project site are Old Highway 395 (P-37-033557), located approximately 0.13 mile west of the Project site (the current State Route 163 and Linda Vista Road are Old Highway 395 routes), and a residence forming part of the Serra Mesa Tract (P-37-036319), located approximately 0.32 mile east of the Project site. A cultural resources assessment prepared for the Project site is provided in Appendix B (Jacobs 2022b). The Project site is a surface

parking lot with no existing structures or buildings or known archaeological resources. Therefore, no historical resources would be impacted by the Project's construction or operation.

Although no historical or cultural resources have been identified within the Project site, the Project proposes trenching, removal of existing underground utilities, and the construction of a parking structure that would contain below ground level grading, which has the potential to impact buried historical resources and/or expose previously undiscovered archaeological resources. Implementation of MM CR-1 would reduce potentially significant Project impacts to historical resources to less than significant.

**MM CR-1** To avoid potential impacts to unknown (i.e., buried) historic or cultural resources, mitigation in the form of monitoring during construction shall be required. Monitoring shall be performed by qualified archaeological monitors and Kumeyaay Native American monitor. In the event that previously unidentified potentially significant historic or cultural resources are discovered, the monitor shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery until such time that the sensitivity of the resource can be determined. If Native American resources are identified during construction, the resources shall be reburied onsite within a designated 5-foot by 5-foot area.

RCHSD shall provide evidence that a County-certified monitor has been contracted to implement a Grading Monitoring Program. RCHSD shall complete and submit a final report that documents the results, analysis, and conclusions of all phases of the Grading Monitoring Program, to the satisfaction of the Director of the County Department of General Services.

A Monitoring Discovery and Historic Property Treatment Plan shall be prepared and implemented to the satisfaction of the County Director of the Department of General Services. The Monitoring Discovery and Historic Properties Treatment Plan shall apply to the treatment of cultural and historic resources once they are discovered. For cultural and historic resources determined to be of significance, a Data Recovery Program to mitigate Project impacts shall be prepared by the consulting archaeologist and approved by the County, then carried out using professional archaeological methods.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant with Mitigation Incorporated:** Refer to response included for question V. a) above and MM CR-1.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project site was previously graded as part of the original development of the JJC. Ground-disturbing activities for the Project would occur during construction and could potentially disturb undiscovered human remains. No formal cemeteries or human remains are known to exist onsite or within the Project vicinity. As required by County Grading Ordinance Section 87.429, in the event that human remains are discovered, grading operations shall be suspended in that area and the operator shall immediately inform the County Official, and the requirements of Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99 shall be complied with; therefore, impacts to human remains would be less than significant.

**VI. ENERGY USE --** Would the Project:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Construction activities would primarily consume nonrenewable energy resources such as oil, diesel, and gasoline through operation of construction equipment, material deliveries, and debris hauling. However, construction-related energy consumption would be temporary, and no permanent new source of energy demand would result from construction activities. In addition, activities involving the use of nonrenewable energy resources would follow construction site BMPs, such as reducing idling time of equipment and vehicles to reduce energy use. While construction of the Project components would result in a short-term increase in energy use, construction-related fuel use would have no noticeable effect on peak or baseline demands for energy, and construction design features would further help with energy conservation. The one-time expenditure of fuel is not considered a wasteful or inefficient use of nonrenewable resources. Therefore, construction of the proposed Project would result in a less than significant impact related to construction activity and energy conservation plans.

Project operation would primarily require energy for the operations and maintenance of the two new buildings that would comprise the Pediatric MBH Campus, as well as the new parking structure. The proposed Project components would be designed, constructed, operated, and maintained in compliance with the County Policy G-15 regarding Leadership in Energy and Environmental Design (LEED) Enhanced Commission requirements as feasible, and California Green Building Standards Code - Part 11, Title 24 (CALGreen), and the Building Energy Efficiency Standards - Title 24 and would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project operations. Therefore, impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** State and local agencies regulate the use and consumption of energy through various policies and programs. Assembly Bill 32 (AB 32) (the California Global Warming Solutions Act of 2006), which seeks to reduce the effects of greenhouse gas (GHG) emissions, helped establish the foundation for most of the State regulations intended to reduce energy use and GHG emissions.

Energy resources consumption during the construction of the Project would be predominantly combustion of petroleum-based fuels for vehicle and equipment use. Construction would result in a one-time expenditure of energy use, including diesel fuel and gasoline. Energy demand during Project operations would be minimized through compliance with the California Green Building Standards Code - Part 11, Title 24 (CALGreen); and the Building Energy Efficiency Standards - Title 24 would ensure that construction would be consistent with State and local energy plans and policies to reduce energy (DGS 2019a).

The Project would not conflict with or obstruct any State or local plan for renewable energy or energy efficiency and would adhere to the initiatives of the County General Plan including Conservation and Open Space Element policy COS-15.5 Design and Construction of New Buildings, which requires that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. In addition, the proposed Project would not interfere with San Diego Gas and Electric’s (SDG&E’s) commitment to sustainability and their goal of achieving net zero GHG emissions by 2045 and would not result in a wasteful or inefficient expenditure of SDG&E resources (SDG&E 2021). Therefore, impacts are anticipated to be less than significant.

## VII. GEOLOGY AND SOILS -- Would the Project:

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

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest known active faults to the Project are mapped near the eastern edge of Mission Bay, approximately 2.8 miles southwest of the site. These faults are associated with the Newport-Inglewood-Rose Canyon fault zone. The Project site is not crossed by any faults depicted on the City of San Diego Development Services Department Seismic Safety Study – Geologic Hazards and Faults map (City of San Diego 2008b). Considering the distance between the Project site and the nearest mapped active faults, no impact would occur from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this Project.

ii) Strong seismic ground shaking?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The proposed Project site is located in a seismically active region. The Project site could be subject to strong seismic ground shaking during construction or operation due to activity on nearby (such as the Newport-Inglewood-Rose Canyon) and regional (such as the Elsinore) faults. The potential to experience substantial seismic ground shaking is a common hazard for every project in Southern California, and the hazard cannot be avoided. Building structures have been and continue to be successfully designed and constructed based on mandatory structural design criteria, such as the California Building Standards Code (CBC) (DGS 2019b). Project construction methods and building standards would adhere to Title 24 of the CBC and County building standards; therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Soil liquefaction occurs generally in the upper 50 feet below the ground surface when saturated, loose soils lose their strength because of excess pore water pressure caused by earthquake ground shaking. Shallow groundwater conditions are not present at the Project site, and the site is underlain by very dense formational materials (Geocon, Inc. 2020). In addition, the very dense formational materials anticipated to underlie the site are not prone to seismically induced slope failure or seismically induced settlement. The Project site is not located in an area with liquefiable potential on the City of San Diego Development Services Department Seismic Safety Study – Geologic Hazards and Faults map (City of San Diego 2008b). Therefore, considering the subsurface conditions anticipated at the Project site, impacts are anticipated to be less than significant.

iv) Landslides?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project area is not within a known area that has experienced landslides or slope instability. The Project site is generally flat. Slopes are present to the east of the Project site, descending to Interstate 805. The Project site is located in Geologic Hazard Category 52 as identified in the City of San Diego Development Services Department Seismic Safety Study – Geologic Hazards and Faults map (City of San Diego 2008b). The “Low Risk” geologic hazard category is defined as “gently sloping to steep terrain, favorable geologic structure.” During construction, BMPs and recommended construction methods would be adhered to such as shoring used for vertical excavations and other earthwork activities to avoid potential slope stability concerns. Considering the geology of the Project site and the mandatory construction methods that would be implemented, impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project site is in a previously developed area, and the topsoil at the site has already been disturbed by previous grading and construction activities. Demolition activities propose to remove the current landscaping and paved areas where construction of the Project would occur, resulting in exposed soil at the surface. During construction, implementation of standard construction BMPs and a Storm Water Pollution Prevention Plan (SWPPP) for sediment and erosion controls would minimize the potential for erosion. The contractor would be required to comply with all applicable local, State, and federal soil erosion control requirements. Therefore, impacts related to soil erosion or the loss of topsoil as a result of the construction and operation of the proposed Project are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** As discussed previously, the proposed Project area is predominately flat with some slopes around the perimeter of the Project site. The site is not located near a city- or state-identified landslide, liquefaction (including lateral spreading), or fault rupture hazard areas (CDC 2015; City of San Diego 2018). The collapse potential for the site is anticipated to be low due to the very dense formational materials anticipated to underlie the structural footings. Project components include two new buildings and a parking structure which would be designed and constructed in conformance with all applicable construction standards, the CBC, and all other applicable requirements. Therefore, the Project would not be subject to potential onsite or offsite landslides, lateral spreading, subsidence, liquefaction, or collapse; and, therefore, are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Soils on site generally exhibit a very low to low expansion potential (County of San Diego 2018a). The placement of structures on expansive soil could result in damage to structures. CBC standards (the Uniform Building Code is no longer applicable) specific to expansive soils require that structures tolerate the effects of

expansive soil or that the expansive soils be remediated. Expansive soil remediation could include soil removal and replacement, chemical treatment, or structural enhancements. Therefore, impacts related to expansive soils are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Pediatric MBH Campus would be connected to the City sanitary sewer system. It would not require use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts are anticipated.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Geologic formations beneath the Project site consist of Very Old Paralic Deposits and Mission Valley Formation (Kennedy and Tan 2005). The majority of the site is underlain by Very Old Paralic Deposits (Qvop8, also referred to as the Lindavista Formation), which is considered moderately sensitive for paleontological resources. Mission Valley Formation (Tmv) is considered highly sensitive for paleontological resources. Project construction would entail grading for foundations, trenching for utilities, and deeper excavations to install the basement level of the parking structure. Those activities would have the potential to disturb fossil resources based on the sensitivity of the underlying formations.

As required by the County for projects within areas of high or moderate paleontological resources potential that propose excavation equal to or greater than 2,500 cubic yards, the services of a paleontological monitor would be required, and paleontological monitoring and reporting conditions would be made part of the grading plans (County of San Diego 2009). In compliance with the County's Grading Ordnance Section 87.430, a qualified paleontologist would be present during all or selected grading operations to monitor for the presence of paleontological resources. If fossils greater than 12 inches in any dimension are encountered, then all grading operations in the area where they were found shall be suspended immediately and not resumed until authorized by the County Official. The permittee shall immediately notify the County Official of the discovery. The County Official shall investigate and determine the appropriate resource recovery operations, which the permittee shall carry out prior to the County Official's authorization

to resume normal grading operations. Compliance with County requirements would reduce impacts to paleontological resources or sites or unique geologic features to less than significant.

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

## VIII. GREENHOUSE GAS EMISSIONS – Would the Project:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Greenhouse Gas (GHG) Emissions are said to result in an increase in the Earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human-induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46 percent of the total regional emissions (University of San Diego and EPIC 2008). Electricity and natural gas combustion were the second (25 percent) and third (9 percent) largest regional contributors, respectively, to regional GHG emissions.

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

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an Environmental Impact Report (EIR) shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

The County has prepared *Guidelines for Determining Significance* and *Report Format and Content Requirements* (Guidelines) for addressing climate change in CEQA documents. In February 2018, the County's Board of Supervisors adopted a Climate Action Plan (CAP) that serves as a long-term programmatic plan that identifies strategies and measures to meet the County's targets to reduce GHG emissions by 2020 and 2030, consistent with the State's legislative GHG reduction targets, and demonstrate progress toward the State's 2050 GHG reduction goal (County of San Diego 2018b). In March 2018, several petitioners filed a lawsuit against the County. In December 2018, the San Diego County Superior Court issued a writ ordering the approval of the CAP and its Supplementary Environmental Impact Report (SEIR) to be set aside. Accordingly, there is no approved CAP in San Diego; and the CAP cannot be used as a threshold of significance until such time as it is reapproved in compliance with CEQA.

As the County of San Diego does not currently have any approved quantitative thresholds related to GHG emissions, the quantitative analysis provided herein relies upon the South Coast Air Quality Management District (SCAQMD) adopted screening threshold for heavy industrial projects of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$; SCAQMD 2008). The SCAQMD's jurisdiction has similar climate and land use patterns as San Diego County (i.e., dense population centers and industrial areas to the west and along the coast and rural, low population density areas to the east); and the relative mix of GHG sources in the two regions is similar. Direct and cumulative impacts would be potentially significant and require further analysis if the Project results in emissions that exceed 10,000 $MTCO_2e$ beyond current baseline emissions.

GHG emissions associated with the Project were quantified using CalEEMod Version 020.4.0 and are shown below in Table 5 (see Greenhouse Gas Technical Report in Appendix C for modeling inputs and outputs).

As shown in Table 5, total GHG emissions associated with the Project would be below the SCAQMD screening threshold of 10,000 metric tons per year. Therefore, it is determined that the Project would result in less than cumulatively considerable impacts associated with GHG emissions. GHG emissions would be below the SCAQMD adopted screening threshold which was created by the SCAQMD to ensure compliance with AB 32 GHG reduction goals, which is also a principal goal of the San Diego County CAP. Therefore, the Project would be consistent with the San Diego County CAP.

**Table 5. Greenhouse Gas Emissions**

| Category | $MTCO_2e$/year[1] |
|---|---|
| ***Construction*** | |
| - 2024 | 222 |
| - 2025 | 653 |
| - 2026 | 360 |
| - *Total Construction Emissions* | *1,235* |
| - *Amortized Construction Emissions (30 years)* | *41* |
| ***Operation*** | |
| - Area | >1 |
| - Energy | 1,148 |
| - Mobile | 710 |
| - Waste | 505 |
| - Water | 59 |
| **Total Operation Emissions** | **2,422** |
| **Total Emissions (Construction Plus Operation)** | **2,463** |
| SCAQMD Screening Threshold | 10,000 |
| *Exceed Threshold* | *No* |

[1] U.S. Environmental Protection Agency, Climate Leaders Greenhouse Gas Inventory Protocol Core Module Guidance. Direct Emissions from Mobile Combustion Sources. EPA430-K-08-004. May 2008. Methane and nitrous oxide can constitute up to 5% total GHG emissions from mobile sources. This factor is conservatively used for estimating $CO_2e$ emissions.

Note: Values may not add up due to rounding.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

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

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing

greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy (SCS) element within the 2021 Regional Plan. The strategy identifies how regional greenhouse gas reduction targets, as established by CARB, would be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. The SCS shows that the San Diego region will meet or exceed GHG emissions reduction targets by using land in ways that make developments more compact, conserving open space, and investing in a transportation network that gives residents alternatives to driving alone. Although this Project is not directly related to the transportation system, the Project is an urban infill project implementing compact development practices and is accessible via transit and would not conflict with the SCS or 2021 Regional Plan policies.

On August 31, 2022, the California Legislature passed Assembly Bill 1279 (AB 1279), which requires California to achieve “net zero greenhouse gas emissions” as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. It also requires that statewide anthropogenic GHG emissions be reduced to at least 85 percent below 1990 levels. The bill directs CARB to ensure that its scoping plan identifies and recommends measures to achieve these policy goals. It also directs CARB to identify policies and strategies to enable carbon capture, storage, and utilization, and $CO_2$ removal technologies to complement emission reductions to achieve the bill’s neutrality goals. The County of San Diego has also adopted various GHG-related goals and policies in the General Plan.

Emissions reductions from the Project’s two highest GHG-emitting sources, mobile and energy, would occur over the next decade and beyond, ensuring that the Project’s total GHG emissions would be further reduced. Emissions from electricity would decline as utility providers, including SDG&E, meet their Renewables Portfolio Standard obligations to provide 50 percent of their electricity from renewable electricity sources by 2030, consistent with Senate Bill 350 (SB 350). Project emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards. Overall, these future reductions in GHG emissions would remain consistent with the newly passed AB 1279, which requires “net zero greenhouse gas emissions” as soon as possible, but no later than 2045.

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

Project's consistency with specific General Plan Conservation and Open Space Element policies is provided in Table 6.

**Table 6. County General Plan Policies**

| | Project Consistency |
|---|---|
| ***COS14.3 Sustainable Development*.** Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources. | **Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code. |
| ***COS14.10 Low Emission Construction Vehicles and Equipment.*** Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions. | **Consistent.** The Project would be consistent with this policy and would encourage other developers to use low-emission construction vehicles and equipment |
| ***COS15.1 Design and Construction of New Buildings.*** Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. | **Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code. |
| ***COS15.4 Title 24 Energy Standards.*** Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards. | **Consistent.** The Project proposes implementing energy efficiency features that would meet 2019 Title 24 standards. |

As discussed in Section VII(a) above, the Project's emissions would be below the SCAQMD screening threshold of 10,000 metric tons per year. As such, the Project would not conflict with the County's GHG goals and policies of the General Plan. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases; therefore, the impact would be less than significant.

## IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the Project:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** During construction, routine hazardous materials, such as oil, gas, and diesel fuel from construction equipment, would be used and transported throughout the Project area. A minimal amount of hazardous materials associated with routine building and infrastructure operation and maintenance such as cleaning products, paints, lubricants, and fuels would be used for the Project once construction is complete. The Project would be an expansion of the existing County child and adolescent psychiatric inpatient services and outpatient programs. No new types of hazardous material that are not already in use as part of current hospital operations would be required. Hazardous materials would continue to be managed in accordance with the hospital's hazardous materials business plan. In addition, the Project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead-based paint, or other hazardous materials from demolition activities.

Additionally, the construction contractor would prepare a spill prevention, control, and countermeasures plan for construction and as needed, for Project operations. Compliance with regulatory requirements would reduce potential impacts associated with the use, transport, and disposal of hazardous materials to less than significant.

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

| | |
|---|---|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less than Significant with Mitigation Incorporated | ☐ No Impact |

**Less than Significant Impact:** The Project is not located within one-quarter mile of an existing or proposed school. The nearest school is Kearny High School, located approximately one-third mile to the northwest of the nearest portion of the Project site boundary. However, YTC facilities south of Project site contain classrooms that provide school instruction for detained juveniles for grades 8 to 12. While hazardous emissions from construction equipment such as oil, gas, and diesel fuel would be temporarily emitted during construction activities, construction methods and BMPs would reduce generation of hazardous emissions in efforts to achieve minimal impacts to air quality emissions, as discussed above; therefore, less than significant impacts would occur as a result of construction of the Project.

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to

a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** Based on a regulatory database search, the Project site is not included on the list compiled pursuant to Government Code Section 65962.5. Additionally, the Project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill; is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash); is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS); does not contain a leaking Underground Storage Tank**;** and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station, or vehicle repair shop; therefore, no impact would occur.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Montgomery Field is located approximately 1.5 miles northeast of the proposed Project site. The Project area is located within the City of San Diego Montgomery Field Airport Land Use Compatibility Plan (ALUCP) (County of San Diego 2010a) and associated Airport Influence Area (AIA) Review Area 2 (County of San Diego 2010b); however, the Project site is located outside the safety zone boundaries. The proposed structures would not exceed the Part 77 Airspace Surface boundary height requirement of 577.3 feet above mean sea level, as stated in the ALUCP (County of San Diego 2010a, 2010b). The proposed Project design would be compatible with surrounding aircraft operations and would be consistent with the Federal Aviation Administration and other laws or regulations to ensure the avoidance of interference with airport operations and continued public safety. Implementation of the Project would therefore result in a less than significant impact related to a safety hazard for people residing or working in the Project area.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** During construction of the Project, temporary lane closures would temporarily affect vehicle circulation within the Project area. A Traffic Control Plan (TCP) would be implemented during construction to ensure no interference or disruptions of emergency plans.

The San Diego County Operational Area (OA) for Emergency Operations consists of the County and all jurisdictions in the County. The Operational Area Emergency Operations Plan (EOP; Unified San Diego County Emergency Services Organization and County of San Diego 2018) describes a comprehensive emergency management system which provides for a planned response to any emergency associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergencies, identifies components of a comprehensive emergency management system, and describes the overall responsibilities for protecting life and property, assuring the overall wellbeing of the population. This plan includes evacuation planning and states that jurisdictional evacuation plans will be consistent with the OA Evacuation Annex. Also, the City Office of Homeland Security is responsible for development and updating of the City of San Diego EOP (San Diego Municipal Code, Section 51.0107). However, the City does not currently have a published EOP. City Administrative Regulation Number 1.01, Emergency Operations Procedures (December 21, 2018) facilitates effective operations during emergency incidents and disasters. It supplements the City of San Diego Emergency Operations Plan and other Citywide (i.e., multi-department) Emergency Plans and Protocols, which applies to all City departments. The construction and operation of the Project, on parcels designated for this type of land use, would not impair implementation or physically interfere with the County OA EOP or evacuation plans; therefore, impacts would be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The construction and operation of the proposed Project would not increase the risk of wildfire, as the Project would be located entirely within a highly urbanized and built environment. The proposed Project site is located in an area

mapped as a Very High Fire Hazard Severity Zone (City of San Diego 2021f). However, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because the Project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code. Project site access would be designed to comply with City of San Diego Fire Department access requirements. Applicable fire safety building practices for construction in wildland-urban interface fire areas including Chapter 7A of the 2007 California Building Code, as adopted and amended by the County of San Diego Title 9 Construction Codes and Fire Code, would be followed (CBC 2016; County of San Diego 2017).The Project would result in a less than significant impact.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project does not involve or support uses that allow water to stand for a period of 72 hours (three days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the Project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies, etc.), solid waste facility, or other similar uses. The proposed Project would also not involve or support uses that would substantially increase current or future residents' exposure to vectors, including mosquitoes, rats, or flies, which are capable of transmitting significant public health diseases or nuisances. Therefore, no impact would occur.

## X. HYDROLOGY AND WATER QUALITY -- Would the Project:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** While construction activities such as soil disturbance, paving, and onsite stockpiling of materials and construction equipment could affect surface water runoff quality, typical construction BMPs, such as silt fencing and protection of storm drain inlets, would be implemented as needed. The proposed Project would disturb greater than 1 acre of land and would therefore require compliance with the National Pollutant

Discharge Elimination System (NPDES) Construction General Permit which requires preparation and implementation of a SWPPP in order to obtain grading and building permits (SWRCB 2012). Construction stormwater BMPs would be implemented during all phases of construction in order to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project area.

The proposed Project site is located on a paved surface parking lot in an urban area serviced by existing municipal storm drains. The Project proposes to construct new storm drains that would be connected to the existing storm drain system along Birmingham Way. Stormwater runoff would not be discharged directly offsite into the natural drainage located to the east of the Project site.

Because the proposed Project would be constructed on an area currently covered by paved parking, it would not increase the amount of impervious surface generating stormwater runoff from the site. However, the proposed Project would result in the replacement of more than 5,000 square feet of impervious surfaces and therefore would require a Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP) to implement San Diego County BMPs and manage stormwater runoff quality to the existing City storm drain system post construction. With implementation of the BMPs, the Project would comply with the 2013 Municipal Separate Storm Sewer System (MS4) Permit (Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100).

No surface waters are present on the Project site or within the Project vicinity. It is not anticipated that the Project would require a separate Regional Water Quality Control Board (RWQCB) approval. These measures would enable the Project to be in compliance with the applicable local, State, and federal regulatory requirements.

Therefore, the proposed Project would not violate water quality standards or waste discharge requirements nor substantially degrade surface or groundwater quality; and impacts would be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Pediatric MBH Project would receive its water from the City of San Diego, which draws the majority of its water supply from surface reservoirs or other imported water sources. A geotechnical investigation performed for the adjacent YTC Phase 1 – Urban Camp Facility Project estimated groundwater to be deeper than approximately 50 feet below the existing grade of the Project area; therefore, it is highly unlikely that groundwater would be encountered during construction of the proposed

Project (Geocon, Inc. 2020). The surrounding area is situated more than 380 feet above sea level, and the regional groundwater table is anticipated to be located well below the planned subterranean excavations. No change in groundwater recharge would occur due to the replacement of existing impervious surface. Furthermore, the proposed conversion of paved areas to landscaped areas and the incorporation of stormwater BMPs may lead to a minor increase in groundwater recharge. Construction and operation of the proposed Project would not result in the use or depletion of groundwater supplies. Therefore, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts are anticipated to be less than significant.

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:

v) Result in substantial erosion or siltation on- or off-site

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project site is located on an entirely urbanized area and would not alter the course of a stream or river. Construction of the proposed Project would disturb greater than 1 acre of land and would therefore require compliance with the NPDES Construction General Permit and requires preparation and implementation of an SWPPP in order to obtain grading and building permits. Construction stormwater BMPs would be implemented during all phases of construction in order to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project area. These measures would enable the Project to be in compliance with the applicable local, State, and federal regulatory requirements.

Diversions to or permanent increases in runoff that is discharged to unpaved slopes or channels is not anticipated. A hydromodification impact due to substantial increase in pavement which could intensify downstream stream flows which may accelerate stream flows is not anticipated, as the Project site is currently a paved parking lot. Any potential impacts during construction would be temporary and would be minimized through the implementation of a SWPPP with a construction site BMP strategy in compliance with the Construction General Permit. No construction activities are anticipated in an existing natural or engineered stream or river. As note in response to Section X a), the Project would prepare a PDP SWQMP and would implement BMPs to manage stormwater runoff quality post construction. Therefore, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which

would result in substantial erosion or siltation on or off site; and impacts would be less than significant.

vi) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project site is located on an entirely urbanized area and would not alter the course of a stream or river. During construction, the contractor would be required to control run-on and runoff from the construction site in compliance with the NPDES permits and the SWPPP. Post construction, the proposed Project would not result in an increase in the total paved area as the Project site is located on an existing paved parking lot. In addition, the proposed Project would provide new landscaped areas which would help reduce total runoff and would provide new permanent treatment controls which would also increase retention. As new storm drains would control site runoff and discharge to City storm drains, there would be no new permanent flooding risk on- or offsite.

Therefore, the construction and operation of the proposed Project would not result in a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on or off site; and impacts would be less than significant.

vii) 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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Please refer to the discussion under Section X c) ii.

The proposed Project is not anticipated to change runoff volumes, and existing storm drains are adequate to handle runoff from the Project site. The Project site is primarily an impervious, paved surface parking lot. The Pediatric MBH Project would remove most of the parking lot and replace it with the MBH Campus, which would incorporate landscaped areas that would result in some reduction in impervious surfaces on the Project site. Stormwater runoff would be collected and treated by use of features such as biofiltration basins or modular wetlands, before conveyance to the existing City storm drain system.

The stormwater treatment systems would also detain and control release of stormwater runoff during heavy storm events.

No substantial additional polluted runoff would occur, as the proposed Project would reduce paved areas; and Low Impact Development BMPs would be implemented to provide treatment of runoff in permanent conditions. The proposed Project would comply with the NPDES permits and the SWPPP during construction, as required. Therefore, the construction and operation of the proposed Project would not 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; and impacts would be less than significant.

viii) Impede or redirect flood flows?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project is located within Zone X, or "Area of Minimal Flood Hazard" as defined by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for San Diego County and incorporated areas, Panel 1617 of 2375, and thus is not within any flood hazard areas (FEMA 2012). The existing condition of the Project area is designed to prevent flooding hazards on site, and the proposed Project would not impede or redirect flood flows; therefore, no impacts are anticipated.

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

i) Flood Hazard

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project site is located within Zone X, or "Area of Minimal Flood Hazard" as defined by the FEMA FIRM and thus is not within any flood hazard areas. The existing condition of the Project area is designed to prevent flooding hazards on site; and, therefore, the proposed Project would not risk release of pollutants due to inundation in a flood hazard zone and no impact would occur.

ii) Tsunami

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project site is located more than 5 miles from the Pacific Ocean and is not located within a San Diego County Tsunami Inundation zone as defined by the California Department of Conservation (CDC 2009). The closest mapped tsunami inundation areas to the Project site are in Mission Bay Park more than 3 miles to the west. Therefore, risk of release of pollutants due to Project inundation in a tsunami zone is not anticipated; and no impacts would occur.

iii) Seiche

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project is not located in the vicinity of a waterbody large enough to present a risk of inundation by seiche. Therefore, risk in the release of pollutants is not anticipated; and no impacts would occur.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The proposed Project site is located within the boundaries of the Lower San Diego Hydrologic Area of the San Diego River Watershed Management Area and is subject to the Water Quality Control Plan for the San Diego Basin as administered by the California RWQCB, San Diego Region (SDRWQCB 1994). No medium- or high-priority groundwater basins are present within the vicinity of the Project site.

During construction, an SWPPP with a construction site BMP strategy in compliance with the Construction General Permit would be implemented to prevent discharges of non-stormwater pollutants. A PDP SWQMP would include BMPs to manage stormwater runoff quality post construction. Surface runoff at the Project site would be received by the City of San Diego MS4, which drains the runoff into receiving waters such as rivers, reservoirs,

or bays. The proposed Project would be required to meet the design standards and procedures of the City of San Diego Drainage Design Manual (City of San Diego 2017b).

Therefore, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; and impacts are anticipated to be less than significant.

## XI. LAND USE AND PLANNING -- Would the Project:

a) Physically divide an established community?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Project site is in an existing urban and built environment and the surrounding area consists of mostly medical or commercial land uses that would not conflict with the Project (City of San Diego 2015a). No significant extension of public utilities would be required, as existing pipelines for water and wastewater are located on the Project site or within the vicinity. The Project would complement the surrounding land uses and would not result in the division of an established community or remove any access to neighborhoods or businesses; therefore, there would be no impact.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less Than Significant With Mitigation Incorporated:** Government Code Section 53091 states that “each local agency shall comply with all applicable building ordinances and zoning ordinance of the county or city in which the territory of the local agency is situated.” As defined in Section 53090(a), however, the term “local agency” excludes counties, among other agencies. The general rule requiring compliance with land use regulations is not applicable to the County of San Diego in its construction of county public facilities within city limits. However, per CEQA Appendix G and the County CEQA checklist, the County is required to determine the potential environmental impacts related to conflicting with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, or conflicting with Habitat Conservation Plans or other type of approved biological habitat management plans.

The proposed Project would be compatible with the surrounding medical office uses in the area and would be consistent with the other existing medical facilities in the immediate vicinity. The proposed Project would be consistent with applicable goals and guidelines contained in the Public Facilities, Services and Safety Element of the City of San Diego General Plan (2018) to achieve the goal of providing public and healthcare services and facilities that are accessible and meet the needs of residents, as well as the Serra Mesa Community Plan and City of San Diego General Plan (City of San Diego 2015a). The site is designated as Institutional & Public and Semi-Public Facilities in the City's General Plan. The Project would be consistent with this designation. The Serra Mesa Community Plan identifies the Project site as part of the Serra Mesa Health-Institutional Complex and supports the hospital growth and new proposals for improvements since the "hospital uses are a major activity with substantial public service and provide economic and employment resources to Serra Mesa and the City of San Diego" (City of San Diego 2017a). The Project would also be consistent with the Community Plan designation.

The zoning for the Project site is RS 1-7; Residential Single Unit. However, neither the site nor adjacent areas support single unit residences. The Pediatric MBH Campus would not be inconsistent with surrounding land uses, which consist of hospital campuses and the YTC campus.

The Project site is located within the City of San Diego Montgomery Field Airport Land Use Compatibility Plan (ALUCP) and is located in Review Area 2 of the ALUCP. The proposed structures would not exceed the Part 77 Airspace Surface boundary height requirement of 577.3 feet above mean sea level, as stated in the ALUCP (County of San Diego 2010a, 2010b) and so would be consistent with the ALUCP.

The Project site is adjacent to lands within the City's MHPA. The City's MSCP requires that land uses adjacent to lands designated as MHPA be managed to ensure minimal impacts to the MHPA (City of San Diego 2021a). As discussed under response to Section IV f), MHPA Land Use Adjacency Guidelines to reduce impacts to the MHPA would be implemented through MM BR-2; Implementation of MM BR-2 would reduce Project impacts to this adjacent land use. Therefore, impacts due to conflict with any applicable land use plans, policies, programs, or regulations would be less than significant with the incorporation of mitigation.

## XII. MINERAL RESOURCES -- Would the Project:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The majority of the areas surrounding the proposed Project site is located within areas classified by the California Department of Conservation, Geologic Energy Management Division (CalGEM, formerly known as the Division of Oil, Gas, and Geothermal Resources) as a Mineral Resource Zone-3 (MRZ-3), defined as an MRZ where the significance of mineral deposits cannot be determined from the available data (CDC 2016). East of the Project site includes an area classified as MRZ-2, defined as an MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled. However, the area is located outside the Project work limits and would be avoided. Therefore, the proposed Project would not result in a loss of availability of known mineral resources; and no impacts are anticipated to occur.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** While areas classified as MRZ-2 are present east of the Project site, such areas are outside the Project footprint and are restricted due to the MSCP/MHPA preservation goals. The proposed Project is primarily located in an MRZ-3 area that is highly urbanized and developed, making it currently inaccessible for mining, and would not result in a significant impact to any known locally important mineral resources. All future mining operations would not be feasible due to the urban and built environment and sensitive resources surrounding the Project area. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value; no impact would occur.

**XIII. NOISE --** Would the Project result in:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** A temporary increase in ambient noise levels in the vicinity of the proposed Project would be expected during construction as a result of operation of construction equipment and vehicles required for site preparation, material deliveries, debris hauling, and construction of the proposed Project components. Construction

activities on the Project site are subject to County General Plan Noise Element and noise ordinance, while activities occurring in the adjacent City rights-of-way would be subject to the City General Plan Noise Element and noise ordinance. All construction activities would occur between the hours of 7 a.m. and 7 p.m. as allowed under both the County's noise ordinance (San Diego County Code of Regulatory Ordinance Sections 26.408 and 26.409) and the City's noise ordinance (San Diego Municipal Code Section 59.5.0404, Construction Noise) (County of San Diego 2011; City of San Diego 2015).

Average construction equipment noise levels provided by the Federal Highway Administration (FHWA) in the *Highway Construction Noise Handbook* (2006) shows that the loudest equipment utilized (graders and paving equipment) for construction would produce a maximum noise level of 85 A-weighted decibels (dBA) at 50 feet away. See the Noise Technical Report (Jacobs 2022d) in Appendix D.

The closest noise-sensitive residential land to the construction site is the Shores Post-Acute, a nursing home 0.1 mile south of the Project site. However, the adjacent YTC also contains residential area for youth. Construction activities would take place approximately 50 feet from the YTC. Maximum exterior noise levels experienced at the YTC would be approximately 85 dBA, which is the San Diego County maximum noise level limits. Construction noise levels would not exceed these noise limits.

The Project would not generate a substantial temporary increase in ambient noise levels, and thus impacts are anticipated to be less than significant during Project construction. Construction activity would occur approximately 100 feet from the Girls Rehabilitation Center. In accounting for distance attenuation of 6 dBA per doubling of distance, maximum exterior noise levels experienced at the Girls Rehabilitation Center would be 79 dBA, which is less than the San Diego County maximum noise level limits. Construction equipment would be utilized intermittently throughout the day and moved throughout the Project site. Construction activities would not exceed an average sound level of 75 dB for an eight-hour period between 7 a.m. and 7 p.m.

While the proposed Project would introduce two new patient buildings as well as a new parking structure which would serve both the Pediatric MBH Campus and the County's Juvenile Court and Juvenile Probation Center, new stationary noise sources and roadway traffic noise sources would be introduced during Project operations; however, they are expected to be consistent with the existing noise conditions of both the Project site and the adjacent hospital facilities and medical offices. Operational impacts related to the generation of substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of established and applicable standards are anticipated to be less than significant.

The heating, ventilation, and air conditioning (HVAC) system proposed for the two new patient buildings has not been specified, and noise levels vary depending on the system size. However, it is assumed that one or more HVAC compressor units would be installed on the rooftops of the two new patient care buildings. HVAC noise levels can be expected

to range from 60 to 70 dBA at 5 feet from the rooftop equipment and ventilation openings (Illingsworth & Rodkin 2011). Assuming HVAC units are installed at the center of each rooftop, a 70-dBA reference noise level would attenuate to 52 dBA at 40 feet from the source. HVAC noise would be less than the 60-dBA criteria at the Project property line, which is below the 60-decibel (dB) Community Noise Equivalent Level (CNEL) threshold for the County of San Diego (County of San Diego 2011).

Emergency power source for the facility would consist of an Emergency Power Supply (EPS) coupled to an Emergency Power Supply System. The EPS would include a single diesel-operated engine generator set. Maximum noise levels for generators at 50 feet are 82 dBA (FHWA 2006). The essential power generator would be installed in an exterior sound-attenuated fashion. This shall provide sound attenuation to a minimum of 70 dB. This would limit noise from the generator, ensuring that noise levels would not exceed the 60-dB CNEL threshold for the County of San Diego.

Finally, the Project's conformance to the San Diego County General Plan Noise Element and County noise ordinance and the City of San Diego General Plan Noise Element and City noise ordinance would ensure that the Project would not create cumulatively considerable noise impacts because the Project would not exceed the local noise standards for noise-sensitive areas; and the Project would not exceed the applicable noise level limits at the property line or construction noise limits derived from State regulation to address human health and quality of life concerns. Therefore, the Project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies and the impacts would be less than significant.

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

| | |
|---|---|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less than Significant with Mitigation Incorporated | ☐ No Impact |

**Less than Significant Impact:** Currently, the County and the City of San Diego do not have vibration thresholds; however, Caltrans provides vibration design criteria for construction damage (Caltrans 2020). Caltrans criteria thresholds were utilized in determining potential construction impacts generated by the Project. Construction of the proposed Project could generate groundborne vibration and noise resulting from potential construction activities associated with the proposed buildings and parking structure. As such, the proposed Project has the potential to generate excessive groundborne vibration or groundborne noise levels during Project construction which may adversely affect nearby sensitive land uses, such as occupied residences, offices, or historic buildings that are structurally sensitive to groundborne vibration. The level of vibration received by these land uses would depend both on the vibrational energy-generating capability of the construction equipment or process, and the type of surface soils and strata through which

the vibration transmits from the source of the receiver. The nearest building from the Project site is located approximately 25 feet away. It is assumed that Project construction would not include impact type or vibratory type pile driving. Construction activities that could result in groundborne vibration and noise would be limited to between 7 a.m. and 7 p.m. as discussed in Section XVIII a).

The San Diego Juvenile Probation building is located approximately 25 feet from the construction activity for the proposed Project. Based on the distance of the nearest sensitive receptors and the anticipated vibration levels, the operation of a vibratory roller would result in construction vibration levels of 0.210 inches per second peak particle velocity (in/sec PPV) at 25 feet. This vibration level would be below the Caltrans vibration damage potential threshold for commercial buildings (2.0 in/sec PPV), and, with commercial buildings located 25 feet away, would be on the order of 0.210 in/sec PPV (vibratory roller), which would be distinctly perceptible but not excessive (see the Noise Technical Report in Appendix D) and impacts would be less than significant.

All impacts would be short-term and temporary during the construction phase, and no permanent impacts associated with Project operations are anticipated, given that the Project does not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on site or in the surrounding area.

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

| | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less than Significant with Mitigation Incorporated | ☒ No Impact |

**No Impact:** While the Pediatric MBH Project is covered by the Airport Land Use Compatibility Plan for Montgomery Field, the proposed Project components are situated well outside the 65-dBA CNEL contours associated with the airport (County of San Diego 2010a). Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels; and no impacts are anticipated.

## XIV. POPULATION AND HOUSING -- Would the Project:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project would not include construction of new residential dwellings or require the extension of roads or other infrastructure. Construction workers involved with the construction phase of the Project would be temporary and would likely be drawn from the existing labor pool in the region. Their temporary presence would not result in an increase in demand for housing, goods, or services over existing conditions (City of San Diego 2015a). Impacts related to substantial unplanned population growth are not anticipated.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** Construction and operation of the proposed Project would not directly affect or displace any existing residential units, as the Project site is an existing paved parking lot. The Project would not displace any people or homes and would not necessitate the construction of any replacement housing. No impacts would occur.

## XV. PUBLIC SERVICES

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

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

i) Fire protection?

**Less than Significant Impact:** The City of San Diego Fire-Rescue Department (SDFD) provides fire, emergency medical, lifeguard, and emergency management services (City of San Diego 2021b) in the Project area. The Project site is within the service area of SDFD Station 23 located at 2190 Comstock Street, approximately 1.5 miles from the site. Construction activities may require temporary lane closures that could impact response times. However, the contractor would coordinate all temporary lane closures and detour plans in advance with the SDFD to minimize temporary delays in emergency response times, including the identification of alternative routes for emergency vehicles during construction. The Project site is located in an urbanized area where fire protection services are already provided. Project site access would be designed to comply with City access requirements including those addressing number and width of fire access roads, turning radii, and maximum grades. Additionally, the Project would not adversely affect existing levels of fire protection services to the area and would not require the construction of new or expanded governmental facilities; therefore, impacts would be less than significant.

ii) Police protection?

**Less than Significant Impact:** Police protection services in the Project area are provided by the San Diego Police Department (City of San Diego 2021c). The closest substation to the Project area is the San Diego Police Department Eastern Division, located northeast of the Project site at 9225 Aero Drive near Montgomery Field. The Inpatient Acute Care Hospital would have a secure vehicular sallyport to provide a secure entry for patients

arriving by ambulance or law enforcement. The Project site would not adversely affect the existing police services in the area and would not require the construction of new or expanded governmental facilities; therefore, impacts would be less than significant.

iii) Schools?

**No Impact:** The proposed Project is located within the San Diego Unified School District. The Project would not increase population or generate new students; therefore, the Project would not increase the demand for schools in the area. Construction of a new school or the expansion of existing schools within the district would not be required; therefore, no impact would occur.

iv) Parks?

**No Impact:** The proposed Project would not include any residential development, nor would it result in an increase in population that could increase demand for new or physically altered park facilities. Therefore, the Project would not require the construction of a new park or the expansion of existing park facilities in the Project vicinity, and no impact would occur.

v) Other public facilities?

**Less than Significant Impact:** The proposed Project would include the demolition of an existing paved parking lot and the construction and operation of two new buildings comprising the Pediatric MBH Campus and a new parking structure. Operation of the associated facilities would increase the number of employees and visitors per day. However, the Project would not result in increased demand for the construction of new or extension of existing public facilities; therefore, impacts would be less than significant.

## XVI. RECREATION

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project would not include any residential development, nor would it result in an increase in population that could increase the use of existing neighborhood and regional parks or other recreational facilities that would accelerate or result in substantial physical deterioration of parks and recreational facilities; therefore, no impact would occur.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project is the construction and operation of a Pediatric MBH providing inpatient and outpatient services. The Project does not include provision of recreational facilities, nor would it create a demand for additional recreational facilities. The Project does not include recreational facilities or require the construction or expansion of recreational facilities that would pose an adverse physical effect on the environment (City of San Diego 2015b); therefore, no impact would occur.

## XVII. TRANSPORTATION -- Would the Project:

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less Than Significant Impact:** The Mobility Element of the City's General Plan (City of San Diego 2015c) outlines policies organized in the following categories related to different transportation system elements: Walkable Communities, Transit First; Street and Freeway System, Intelligent Transportation Systems (ITS), Bicycling, Parking Management; Airports, Passenger Rail, Goods Movement/Freight, and Regional Coordination and Financing. These categories cover the full range of transportation modes, including transit, roadway, bicycle, and pedestrian facilities.

The physical changes of the proposed Project are limited to provision of turn lanes in Birmingham Way, adding new driveways, and patient drop-off area to Birmingham Way within the local roadway circulation system. The new driveway locations and design would be consistent with the programs, plans, ordinances, and policies of the City of San Diego.

The City of San Diego Transportation Study Manual (TSM) (City of San Diego 2020a) under the Local Mobility Analysis (LMA) sub-section, addresses the Level of Service (LOS) criteria for intersections and roadway sections. However, per Senate Bill 743 and subsequent CEQA Guidelines (§ 15064.3, subdivision (b)), these elements of the TSM should not be considered as a determination of significance. The LMA prepared for the Project (Linscott, Law and Greenspan 2022a) (Appendix E) focuses on automobile delay and LOS within the Project area and evaluates the effects of the Project on the local

transportation system to determine if the Project triggers the need for improvements. The Project is estimated to generate approximately 779 Average Daily Trips (ADT) with 62 a.m. peak-hour trips (46 inbound / 16 outbound) and 78 p.m. peak-hour trips (23 inbound / 55 outbound). To determine the potential Near-Term (Opening Year 2027) traffic effects from the Project, traffic volumes for the Near-Term (Opening Year 2027) without Project and Near-Term (Opening Year 2027) with Project scenarios were developed and traffic operations were evaluated. As described in the discussion of Site Access in the Project description, there are two potential scenarios for user site access; one in which the southern driveway is confined to Probation and Court users only and with all Pediatric MBH users accessing the site from the two driveways off Birmingham Way, and another scenario where both Court and Probation users and Pediatric MBH users would be able to access the site via the southern driveway resulting in Pediatric MBH users being able to use all three driveways to access the site. The LMA concluded that either scenario of the Project would not result in any substantial transportation-related effects, and no transportation-related offsite improvements beyond than those proposed as part of the Project would be required.

During construction, temporary impacts to the transportation system would occur due to construction activities on or adjacent to the streets and as a result of construction worker trips and deliveries of equipment and supplies. However, these impacts would be less than significant as the impacts would be minimal and the effects on the transportation system would be negligible. They would be further reduced with the implementation of a Transportation Management Plan (TMP) during construction.

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

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|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☒ Less than Significant with Mitigation Incorporated | ☐ No Impact |

**Less than Significant with Mitigation Incorporated:** Senate Bill 743, which was codified in Public Resources Code Section 21099, required the California Office of Planning and Research (OPR) to establish new CEQA Guidelines “for determining the significance of transportation impacts of Projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The new criteria were required to move away from vehicle delay and LOS and move toward more multimodal concepts “that may include, but are not limited to, vehicle miles traveled (VMT), vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

In 2018, Section 15064.3 was added to the CEQA Guidelines to reflect the provisions of Senate Bill 743. The section addresses both land use and transportation projects, and broadly describes the methodology, including the potential for qualitative analysis, used to

assess VMT. Agencies are given "broad discretion" to select the methodology for analysis or even apply a qualitative approach. The OPR prepared a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). The guidance addresses a variety of projects, with the recognition that the approach for evaluating impacts is necessarily project-specific.

The County of San Diego does not currently have published VMT analysis guidelines. The TSM published by the City of San Diego on September 29, 2020, was adopted by the City Council on November 9, 2020, as part of the Complete Communities: Mobility Choices program. Given that the City has developed significance thresholds and technical methodologies, and that the Project's traffic would use City streets for access to the site, the City TSM was utilized for this analysis. Based on City TSM guidance, the Project does not screen out from having to conduct a VMT analysis. Therefore, a *Vehicles Miles Travelled Assessment* was prepared for the Project (Linscott, Law and Greenspan 2022b) (Appendix F). The Project falls under the "Commercial Employment" land use type and is calculated to generate 779 daily unadjusted driveway trips. According to the TSM standards, the Project's Commute VMT per Employee is considered the same as the Commute VMT per Employee of the census tract in which it is located (i.e., Census Tract 87.02). Census Tract 87.02 has an 18.9 Commute VMT per Employee, or 98.9 percent of the regional mean (1.1 percent below regional mean). Therefore, the Project would have a significant VMT impact based on the significance threshold for a "Commercial Employment" project of 15 percent below the regional mean Commute VMT per Employee, and mitigation would be required to reduce the Project's VMT impact.

To offset its VMT impacts, the Project would participate in the City's Complete Communities: Mobility Choices Program and rely upon the Findings and Statement of Overriding Considerations from the Complete Communities: Housing Solutions and Mobility Choices Program Final Program Environmental Impact Report (May 2020) as mitigation. The Project is located in Mobility Zone 2, which means it is either partially or entirely in a Transit Priority Area. The Project's mitigation would be a provision of VMT Reduction Measures totaling at least 5 points per the City's Land Development Manual Appendix T, which is required of projects located within Mobility Zone 2. The VMT Reduction Measures listed in MM TR-1 would total 5 points. Therefore, with implementation of MM TR-1, Project VMT impacts would be less than significant with the incorporation of mitigation.

**MM TR-1** Implement the following VMT Reduction Measures:

- Provide an onsite bicycle repair station
- Install five electric bicycle charging stations
- Provide short-term bicycle parking spaces, at least 10 percent beyond minimum requirements

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project would result in the construction of new vehicular access driveways and general changes to the existing site access and circulation along Meadow Lark Drive and Birmingham Way, both City of San Diego streets. New vehicle access ways or driveway connections to existing roads in the Project area would be designed to comply with City of San Diego Street Design Standards and Fire Department access requirements including those addressing number and width of fire access roads, turning radii, and maximum grades. Offsite improvements, such as the addition of turn lanes in Birmingham Way, would also conform to the City of San Diego Street Design Standards. While circulation improvements and pattern changes would occur as a result of the Project, safety would be equal to or better than current conditions; therefore, no impact would result.

d) Result in inadequate emergency access?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The proposed Project is a medical center on an infill site in a location where the community is largely built-out with existing major roads that provide a means for emergency evacuation. The Project would include a secure vehicular sallyport at the Inpatient Acute Care Hospital to provide a secure entry for patients arriving by ambulance or law enforcement and a separate pedestrian sallyport for patients arriving with their parents or a guardian. Project site access would be designed to comply with City of San Diego Fire Department access requirements and City of San Diego Street Design Standards; therefore, no impact would occur.

## XVIII. TRIBAL CULTURAL RESOURCES -- Would the Project:

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

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**This response applies to both Questions XVIII a) i) and ii) above.**

**Less than Significant Impact with Mitigation Incorporated:** Assembly Bill 52 (AB 52) requires, as part of CEQA, evaluation of tribal cultural resources, notification of tribes, and opportunity for tribes to request a consultation regarding impacts to tribal cultural resources when a Project is determined to require a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report under CEQA.

No tribal cultural resources or historical resources as defined by Public Resources Code Section 5020.1(k) have been identified on the Project site (County of San Diego 2018a). The Project site is not 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). A sacred land file search completed with the Native American Heritage Commission in 2017 did not identify Native American cultural resources in the Project area. In compliance with AB 52, the County notified all tribes and initiated consultation with Native American groups and individuals. One request for consultation was received from the San Pasqual Band of Mission Indians and has been concluded. The San Pasqual Band of Mission Indians requests have been incorporated into Mitigation Measure CR-1. While no tribal cultural resources have been identified within or near the Project site, implementation of Mitigation Measure CR-1 would reduce Project impacts to tribal cultural resources to less than significant.

## 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 would cause significant environmental effects?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The Project would require connection to offsite utilities including sewer lines and storm drains, and potentially electrical. These utility connections would occur within the existing roadbeds of Birmingham Way and Children's Way. This activity would require trenching in these existing roads. This would not cause significant environmental effects.

Demolition activities may include relocation as required for existing underground domestic water, fire water, stormwater, and sanitary sewer connections that serve existing buildings and may be located within the Project site. These relocation activities would occur on the Project site as part of overall site construction. Therefore, the proposed Project would result in less than significant impacts related to the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** According to the 2020 San Diego Urban Water Management Plan, the City's potable water supply, as allocated through the Metropolitan Water District of Southern California, is sufficient for expected demand through 2045 through normal, dry, and multiple dry years (SDCWA 2021). Per County Policy G-15, all County buildings over 20,000 square feet must meet LEED Enhanced Commission requirements via the Green Building Certification Institute (GBCI), resulting in water-efficient design features during Project operation. Because the Project would have 93,000 SF of floor space and would employ up to 90 persons, it does not meet the threshold of a "project" as defined in Section 10912 of the State Water Code, as amended by SB 610, and is not subject to State requirements to prepare a water supply assessment. Therefore, the City would have sufficient water supplies available to serve the Project and reasonably

foreseeable future development during normal, dry, and multiple dry years; and impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** The Pediatric MBH Project is anticipated to generate a sewer flow of 107,280 gallons per day (NBBJ/Rady Children's Hospital – San Diego 2021). The Pediatric MBH Campus would be connected to the city sewer system via a new tie-in to the existing sewer line located within Children's' Way at a location northeast of the Project site. This sewer line discharges to the Kearny Mesa trunk line, which eventually discharges to the City's Point Loma Wastewater Treatment Plant. This plant treats approximately 175 million gallons of wastewater per day generated by more than 2.2 million residents and has a treatment capacity of 240 million gallons per day (City of San Diego 2022). Therefore, the City of San Diego wastewater treatment facilities have adequate capacity to serve the Project wastewater. The proposed Project would have no impact on exceeding the capacity available from the wastewater treatment provider.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** Typical waste materials generated during construction are anticipated to include vegetation, other plant material, and some excess soils and solid waste such as concrete and asphalt. Construction waste would be recycled or would be properly disposed of at an existing landfill. The nearest operating landfill to the Project site is the Miramar Landfill. The landfill has a maximum permitted throughput of 8,000 tons per day and a projected closure date of January 2031 (CalRecycle 2022). Another landfill in San Diego County, Sycamore Landfill, is currently estimated to close in 2042, but that estimated closure date may be extended (County of San Diego 2022). The amount of waste that would be generated during construction, including demolition, would be limited and would occur only during the construction period. The waste volume would be minimal compared to daily total volumes processed at the recycling facilities and landfills in the area. Waste materials generated during construction and operation would be disposed of

in accordance with federal, State, and local regulations related to recycling, which would minimize the amount of waste material entering local landfills. Construction of the Project would require compliance with the City of San Diego Construction and Demolition Debris Recycling Ordinance (City of San Diego 2021e). Construction of the Project would incorporate source reduction techniques, and recycling measures would minimize the amount of construction waste that would need to be disposed of at local landfills. Therefore, impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** Construction of the Project would require compliance with the City of San Diego Construction and Demolition Debris Recycling Ordinance (City of San Diego 2021e). Construction of the Project would incorporate source reduction techniques, and recycling measures would minimize the amount of construction waste that would need to be disposed of at local landfills. Any solid waste generated during construction would be collected, handled, transported, and disposed of consistent with applicable federal, State, and local regulations. Hazardous wastes would be collected, handled, transported, and disposed of consistent with applicable federal, State, and local regulations and would not be comingled with general construction wastes. Therefore, no impacts are anticipated.

**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?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The 2018 Multi-Jurisdictional Hazard Mitigation Plan for the County of San Diego includes goals, objectives, and actions to achieve greater disaster resiliency (County of San Diego 2018d). Specifically, the plan includes Goal 1, Objective 1.D: Action 1.D.6, which states that “high fire hazard areas shall have adequate access for emergency vehicles,” with the intention to limit future development in hazardous areas. Project site access would be designed to comply with City of San Diego Fire Department access requirements.

The proposed Project is located within a Very High Fire Hazard Severity Zone (VHFHSZ), as identified by the City of San Diego Fire-Rescue Department (City of San Diego 2021f); however, all applicable fire safety building practices for construction in wildland-urban interface fire areas including Chapter 7A of the 2007 California Building Code, as adopted and amended by the County of San Diego Title 9 Construction Codes and Fire Code, would be followed (CBC 2016; County of San Diego 2017). Therefore, the proposed Project would not impair any emergency response plans or evacuation plans for wildfire; thus, impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☒ No Impact

**No Impact:** While the proposed Project is located within a VHFHSZ, all construction activities would occur within a paved parking lot, paved roadbed, and a landscaped area between the road and parking lot. Project operations would be consistent with adjacent existing facilities and would not introduce new ignition sources. All applicable fire safe building practices including Chapter 7A of the 2007 California Building Code, as adopted and amended by the County of San Diego Title 9 Construction Codes and Fire Code; and construction BMPs that promote fire safety would be adhered to in order to minimize any potential fire risk during construction activities (CBC 2016; County of San Diego 2017). Therefore, the Project is not anticipated to increase wildfire risks or the uncontrolled spread of wildfire; thus, no impacts are anticipated.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** The proposed Project would require the installation of new associated infrastructure such as two new fire hydrants an underground sewer line tie in beneath Birmingham Way and Children's Way, and road improvements (i.e., driveway connections and turn lanes) on Birmingham Way on the north side of the Project site. The installation of the two new fire hydrants would be located in the western portion of the Project site between the parking structure and the Outpatient Psychiatric Clinic and in the

southern portion of the Project site between the parking structure and Inpatient Acute Psychiatric Hospital. Supply for these two fire hydrants would be provided by the City from the existing 12-inch water main along Birmingham Way, and their installation would ensure adequate safety for hose hookups and water pressure in the event of a wildfire or structure fire that may threaten the Pediatric MBH facilities. Therefore, the installation or maintenance of associated infrastructure would not significantly exacerbate fire risk and would not result in temporary or ongoing impacts to the environment; therefore, impacts are anticipated to be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** 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 instability, or drainage changes. The Project proposes to construct new storm drains that would be connected to the existing storm drain system along Birmingham Way. Stormwater runoff would not be discharged directly off site into the natural drainage area located east of the proposed Project site; therefore, impacts are anticipated to be less than significant.

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant with Mitigation Incorporated:** The proposed Project would not degrade the quality of the environment by reducing habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal as the proposed Project site is situated on an existing paved surface in a predominately urban and built environment. Additionally, this Initial Study analyzed biological, cultural, and tribal cultural resources which have

been determined to have the potential to be significantly impacted from ground-disturbing activities. MM BR-1 and MM CR-1 have been proposed to reduce impacts to biological, cultural, and tribal resources to a level less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant with Mitigation Incorporated:** A cumulative impact could occur if the proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future Projects for each resource area. As a result of this Initial Study analysis, no significant impacts were identified for the proposed Project that could not be mitigated to a less than significant level through the imposition of project-level mitigation. However, when combined with other Projects within the vicinity, the proposed Project may result in a contribution to a potentially significant cumulative impact.

The Project site is on the YTC campus, and the YTC redevelopment project is in progress. Potential significant impacts to biological resources, cultural resources, GHG, noise, and transportation from YTC redevelopment were mitigated through measures identified in a County-issued a mitigated negative declaration (County of San Diego 2018a). Adherence to BMPs and identified mitigation measures would reduce potential cumulatively considerable effects. As a result of this evaluation, no substantial evidence of cumulative effects is associated with the proposed Project and impacts would be less than significant with mitigation incorporated.

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

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less than Significant with Mitigation Incorporated ☐ No Impact

**Less than Significant Impact:** It is anticipated that compliance with applicable federal, State, and local regulations would result in the proposed Project having no substantial adverse impacts on human beings. As described in this Initial Study, the potential for adverse direct or indirect impacts to human beings was considered and determined that no

substantial evidence is found that the proposed Project would cause adverse effects on human beings; therefore, impacts would be less than significant.

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

**TECHNICAL STUDIES: The following is a list of Project-specific technical studies used to support the analysis of each potential environmental effect:**

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