DRAFT INITIAL STUDY/ENVIRONMENTAL CHECKLIST AND MITIGATED NEGATIVE DECLARATION FOR THE OAKDALE TOWNHOMES

Prepared for:

Community Development Department, Planning Division
200 Civic Center Way
El Cajon, California 92020

Prepared by:

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San Diego, California 92131
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July 2021

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CITY OF EL CAJON
INITIAL STUDY/ENVIRONMENTAL CHECKLIST AND MITIGATED NEGATIVE DECLARATION

INTRODUCTION

This Initial Study/Environmental Checklist and Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA) [Public Resources Code Section 21000 et seq.] and the CEQA Guidelines [California Code of Regulations Section 15000 et seq.]. This Initial Study/Environmental Checklist determines that the Oakdale Townhomes project has the potential to result in potentially significant impacts on the environmental resources and issues evaluated herein, but revisions to the project and agreed to by the applicant would avoid the effects or mitigate the impact to less than significance. As a result, this document serves as a Mitigated Negative Declaration pursuant to Public Resources Code Section 21064.5 and CEQA Guidelines Article 6.

This document is being made available for a 30-day public review comment period, beginning July 26, 2021, and ending August 25, 2021. Comments regarding the contents and conclusions reached in this Initial Study/Environmental Checklist and Mitigated Negative Declaration must be made in writing and received by 5 p.m. on the last day of the public review period:

Melissa Devine, AICP, Planning Manager
City of El Cajon Planning Division, Community Development Department
200 Civic Center Way
El Cajon, CA 92020

PROJECT DESCRIPTION

1. **Project Title:** Oakdale Townhomes (Site Development Permit [SDP]-2020-0002)

2. **Lead Agency Name and Address:**

   City of El Cajon
   200 Civic Center Way
   El Cajon, CA 92020

3. **Contact Person and Phone Number:** Spencer Hayes, Associate Planner, 619.441.1656

4. **Project Location:** Oakdale Avenue, El Cajon, CA (APN 511-022-07-00) between Third Street and Durham Street (APN 511-022-01-00)

5. **Project Sponsor's Name and Address:**

   Ryan Mikha
   New Vision Building & Design
   1109 E. Washington Avenue
   El Cajon, CA 92019

6. **General Plan Designation:** Low-Density Residential 3-10 (LR)

7. **Zoning:** Residential Multi-family, 2,200 square feet (RM-2200)

8. **Description of Project:**

The project is a Site Development Permit (SDP) application for the Oakdale Townhomes residential project (project). The project involves the construction of a 7-unit townhome complex on a 17,404-square-foot (SF) or 0.4-acre vacant lot on Oakdale Avenue in the eastern portion of the City of El Cajon (City). The site is level with limited vegetation and no mature trees.

The attached townhomes units would be developed in a clustered configuration resulting in the construction of two, two-story buildings containing three and four townhome units, respectively, on either side of a central concrete driveway and common open space area. Each unit would feature approximately 1,435 SF of living space and a 437 SF attached, two-car garage. Each unit would contain three bedrooms and 2.5 bathrooms. The townhomes would have fenced private patios and yards. In total, the project would consist of 11,078 SF of building area, surface parking spaces for guests, private driveway area and private common green space. All parking would comply with the City's requirements by providing 16 spaces, including in-garage spaces and 2 spaces in a surface parking area for guests. The townhomes would be accessed via a new driveway connection to Oakdale Avenue. The project would conform to the 2019 California Residential Code, 2019 California Building Code and 2019 Green Building Standards Code, among other requirements. See **Figures 1 and 2** showing the project location and site plan. **Figures 3 and 4** contain elevations illustrating the exteriors of the proposed structures and other site improvements.

To service the residential units, the project would extend an 8-inch sewer lateral and an 8-inch water line on site from nearby connections in Oakdale Avenue. The project would also relocate two existing sewer laterals that serve adjacent properties and create new connections for those properties to the public system in Durham Street. All connections would be constructed in accordance with the requirements of the City and Helix Water District (HWD).

Drainage and runoff collected on site would be directed to a series of planters constructed below roof downspouts from the residential structures and biofiltration basins constructed along the project frontage facing Oakdale Avenue. The collected runoff would be treated on-site and then conveyed via new storm drain connections to the local storm drain system.

Drought tolerant landscaping would be installed along the frontage of Oakdale Avenue and through the project site consisting of trees, shrubs and vining species. In addition to private backyards, a 1,996 SF private common open space would contain pavers, an open lawn or turf area and landscaping near the rear of the property. Wood fencing would be installed around the site perimeter and between units to provide privacy for the backyards and private open space area.

Construction would include site preparation, grading, utility work and building construction. Grading would be balanced and take approximately two weeks to complete. Construction of the underground wet and dry utilities and paving would commence after grading. Overall, the project would be constructed over a period of six months after approval of construction documents by the City.

Figure 1

Project Location Map and Aerial

BARANEK Consulting Group

N

0 200 Feet

OAKDALE TOWNHOMES

9. Surrounding Land Uses and Setting *(briefly describe the project's surroundings)*:

The project site is in the eastern portion of the City south of Interstate 8 (I-8). The property is a level, vacant lot, situated in a residential neighborhood east of E. Main Street and N. Third Street. Oakdale Avenue from the project site and crosses both roads and intersecting with E. Main Street at a signalized intersection and a yield control at N. Third Street. The property is surrounded by residential housing, consisting of both multi-family and single-family units, on level topography. Several vacant lots occur in the neighborhood surrounding the project site. The I-8 freeway, including an eastbound onramp, is situated 390 feet north of the site. An 8- to 10-foot-high noise wall occurs along the freeway travel lanes in the project vicinity.

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

None.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so. is there a plan for consultation that includes, for example, the determination of significant impacts to tribal resources, procedures regarding confidentiality, etc.?

In accordance with Public Resources Code Section 21080.3.1(b), the Barona Band of Mission Indians, Jamul Indian Village of California, and Mesa Grande Band of Indians, which are traditionally and culturally affiliated with the geographic area within the City of El Cajon's jurisdiction, requested formal notice of and information on proposed projects within the City. On March 16, 2021, in compliance with California Public Resources Code Section 21080.3.1 (Assembly Bill [AB] 52), the City, as Lead Agency, sent a letter to the aforementioned tribes notifying them of the proposed project. A request for consultation was received from the Barona Band of Mission Indians as discussed in Section XVIII of this Initial Study.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages. It is concluded that the project would result in the following potentially significant adverse environmental impacts to the following resource areas:

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

SITE DATA:

PROJECT ADDRESS:	OAKDALE AVE. EL CAJON, CA 92019
PARCEL NUMBER:	511-022-07-00
LOT SIZE:	17,404 SQ. FT.
ZONING:	RM-2200
SETBACK:	FRONT... 10 FT TO PL SIDE ... 6 FT TO PL REAR ... 12 FT TO PL

BMPS LEGEND:

POST-CONSTRCUTION SITE DESIGN BMPs

- [4.3.3] MINIMIZE IMPERVIOUS AREA
- [4.3.4] MINIMIZE SOIL COMPACTION
- [4.3.5] IMPERVIOUS AREA DISPERSION
- [4.3.7] LANDSCAPING WITH NATIVE OR DROUGHT TOLERANT SPECIES

POST CONSTRUCTION SOURCE CONTROL BMPs

- [4.2.1] PREVENTION OF ILLICIT DISCHARGES INTO THE MS4
- [4.2.2] STORM DRAIN STENCILING AND POSTING OF SIGNAGE
- [4.2.3] PROTECTED OUTDOOR MATERIALS STORAGE AREAS
- [4.2.4] PROTECT MATERIALS STORED IN OUTDOOR WORK AREAS
- [4.2.5] PROTECT TRASH STORAGE AREAS
- [4.2.6] ADDNL BMPs BASED ON POTENTIAL RUNOFF POLLUTANTS:
- [A] ON-SITE STORM DRAIN INLETS
- [C] INTERIOR PARKING GARAGES
- [D] NEED FOR FUTURE INDOOR & STR. PEST CONTROL
- [E] LANDSCAPE/OUTDOOR PESTICIDE USE
- [O] FIRE SPRINKLER TEST WATER
- [P] MISCELLANEOUS DRAIN OR WASH WATER
- [Q] PLAZAS, SIDEWALKS, DRIVEWAYS, AND PARKING LOTS

LEGEND:

- PROPERTY LINE
- PROPOSED STRUCTURE
- CONCRETE
- PAVER
- LANDSCAPE
- GRAVEL
- DRAIN INLET
- DRAINAGE DIRECTION

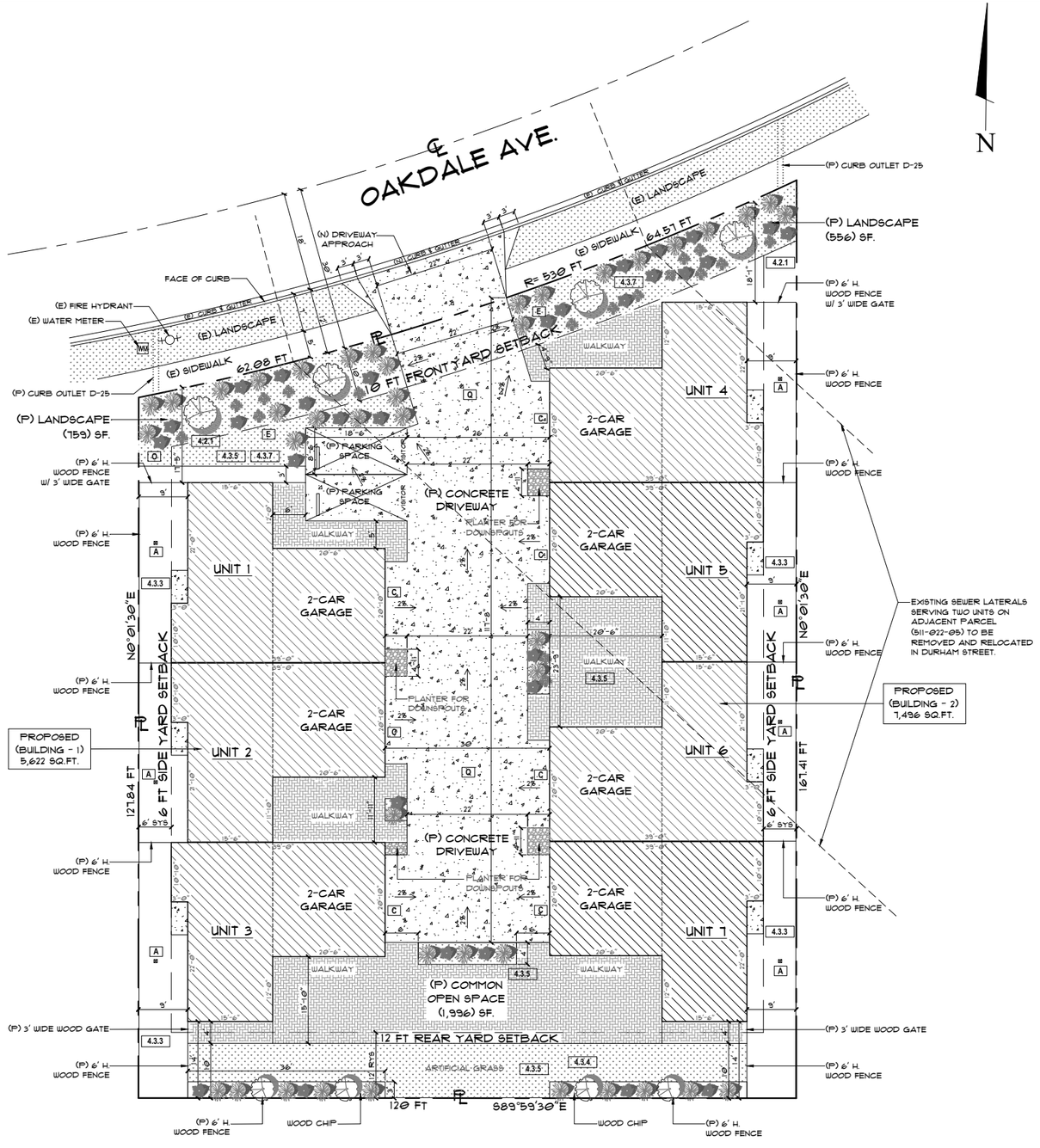
UNITS AREA BREAKDOWN:

BUILDING 1		BUILDING 2	
UNIT 1	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.	UNIT 4	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.
UNIT 2	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.	UNIT 5	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.
UNIT 3	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.	UNIT 6	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.
	TOTAL 1ST FLOOR LIVING AREA ... 1,563 SQ.FT. TOTAL 2ND FLOOR LIVING AREA ...2,718 SQ.FT. TOTAL LIVING AREA...4,281 SQ.FT. IN 3 UNITS TOTAL GARAGE AREA ... 1,341 SQ.FT. 5,622 SQ.FT. TOTAL AREA IN 3 UNITS	UNIT 7	1ST FLOOR LIVING AREA ... 521 SQ.FT. 2ND FLOOR LIVING AREA ... 906 SQ.FT. TOTAL LIVING AREA ... 1,427 SQ.FT. GARAGE AREA ... 441 SQ.FT.
			TOTAL 1ST FLOOR LIVING AREA ... 2,084 SQ.FT. TOTAL 2ND FLOOR LIVING AREA ... 3,624 SQ.FT. TOTAL LIVING AREA ... 5,708 SQ.FT.IN 4 UNITS TOTAL GARAGE AREA ... 1,788 SQ.FT. 7,496 SQ.FT. TOTAL AREA IN 4 UNITS

SITE NOTE:

1- PUBLIC IMPROVEMENTS ARE REQUIRED - ALL DETAILS ARE SHOWN ON A SEPARATE DETAIL PLAN.
2- WORK IN THE PUBLIC RIGHT OF WAY TO TAKE PLACE PER A SEPARATE PLAN AND REQUIRES AN ENCROACHMENT PERMIT.
3- THE EROSION CONTROL BMPS MUST BE INSTALLED PRIOR TO THE START OF ANY DEMOLITION OR CONSTRUCTION ACTIVITIES. PRIOR TO THE START OF ANY DEMOLITION OR CONSTRUCTION ACTIVITIES, THE CONTRACTOR SHALL NOTIFY THE CITY STORM WATER INSPECTOR AT 619-441-1653.
4- AN ENCROACHMENT PERMIT (EP) IS REQUIRED PRIOR TO ANY WORK IN THE PUBLIC RIGHT-OF-WAY). THE EP WILL BE ISSUED BY ENGINEERING DIVISION, 3RD FLOOR, CITY HALL (PERMIT ASSISTANCE CENTER). TO APPLY FOR AN EP YOU MUST PROVIDE THE FOLLOWING:
- AN ENGINEER SCALED DRAWING OF ALL WORK IN THE ROW.
- A TRAFFIC CONTROL PLAN ($300.00 REVIEW FEE)
- INSURANCE CERTIFICATE THAT COMPLIES WITH CITY COUNCIL POLICY D-3
- 2,000,000 GENERAL LIABILITY
- CITY LISTED AS 'ADDITIONAL INSURED' ON SEPARATE ENDORSEMENT WITH SPECIAL CITY REQUIRED LANGUAGE.
- 30 DAY NOTICE OF CANCELLATION ON SEPARATE ENDORSEMENT.
- WORKERS COMPENSATION WAIVER OF SUBROGATION ENDORSEMENT.

5- THE PROPERTY IS SERVED BY SDG&E FOR GAS AND ELECTRIC.
6- CONTRACTOR TO VERIFY ALL DIMENSIONS ON DRAWING AND JOB SITE PRIOR TO CONSTRUCTION. REPORT ANY DISCREPANCIES PRIOR TO START OF CONSTRUCTION.
7- CONTRACTOR TO VERIFY ALL UTILITY LOCATIONS (EXISTING OR NEW) PRIOR TO START OF CONSTRUCTION.



SITE PLAN

SCALE: 1" = 10'

Source: New Vision Building & Design 2021

Figure 2

Site Plan

OAKDALE TOWNHOMES

BARANEK
Consulting Group

ELEVATION 1

SCALE: 1/8" = 1'-0"

ELEVATION 2

SCALE: 1/8" = 1'-0"

ELEVATION 3

SCALE: 1/8" = 1'-0"

Source: New Vision Building & Design 2021

BARANEK
Consulting Group

Figure 3

Building Elevations

OAKDALE TOWNHOMES

ELEVATION 4

SCALE: 1/8" = 1'-0"

ELEVATION 5

SCALE: 1/8" = 1'-0"

ELEVATION 6

SCALE: 1/8" = 1'-0"

Source: New Vision Building & Design 2021

BARANEK
Consulting Group

Figure 4

Building Elevations

OAKDALE TOWNHOMES

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DETERMINATION

On the basis of this initial evaluation *(select one)*:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and ENVIRONMENTAL IMPACT REPORT is required.

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

☐ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Mitigated Negative Declaration pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or Mitigated Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Nothing further is required.

Digitally signed by Spencer Hayes
Date: 2021.07.26 08:17:31-07'00'

Signature

7/26/2021

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

Each of the responses in the following environmental checklist considers the whole action involved, including project-level, cumulative, on-site, off-site, indirect, construction, and operational impacts. A brief explanation is provided for all answers and supported by the information sources cited:

1. 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).
2. A "Less-than-Significant Impact" applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
3. A "Less-than-Significant Impact with Mitigation Incorporated" applies when the proposed project would not result in a substantial and adverse change in the environment after mitigation measures are applied.
4. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant" entries when the determination is made, an EIR is required.

ENVIRONMENTAL ANALYSIS

I. Aesthetics

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
I.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the Project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new sources of substantial light or glare that would adversely affect day or nighttime views of the area?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a–b) The project site is located along Oakdale Avenue south of I-8 in the eastern portion of the City. I-8 is not a designated state scenic highway nor does the City's General Plan identify roadways in the project area as scenic. The project would involve the construction of two two-story residential structures containing seven townhomes on a vacant site in a level, valley location. The project site is an infill location that is surrounded by residential housing. A noise wall along the portion of the I-8 near the site would block any views of the project from the nearby travel lanes. As there are no significant scenic resources on-site or scenic highways in the area, the project would not adversely impact views from scenic vistas in the City and no impact would occur.

c) The project site is zoned RM-2200, which allows for moderately dense residential development. The project would construct 7 townhomes on 0.4 acres, which would conform to the zoning designation for the property which allows for up to 8 units on site. Additionally, the project would comply with the building setback, height and massing regulations contained in the City Zoning Code. Policies of the General Plan that protect scenic resources are focused on protecting views of the surrounding open space system and not the valley floor. As noted above under Response I.a–b, the project is an infill development on the valley area of the City that would not adversely impact views from or to scenic vistas. The proposed residential buildings would be comparable in scale to the other residential development along Oakdale Avenue and appear as an extension of existing development patterns in the area. Thus, the project would conform with applicable zoning and other regulations

governing scenic quality. The project would improve the quality of the site and not degrade visual character. A less-than-significant impact would occur.

d) The project is proposed in an urban infill location. The additional wayfinding lighting proposed by the project would be consistent with the City's lighting standards and would not create a substantially new source of light or glare. Thus, lighting impacts would be less-than-significant.

II. Agriculture and Forestry Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resource Board. Would the Project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a–d) The project site is located in an existing urbanized area with no agricultural or forest resources within the vicinity. The site is mapped as Urban and Built-Up Land in the California

Important Farmland Finder system of the state Department of Conservation. The project site is not zoned for agricultural or forestry purposes; and there is not a Williamson Act Contract associated with the site or in the vicinity. Therefore, the project would not convert Important Farmland, conflict with agricultural zoning, or otherwise cause the conversion of farmland or forest land to non-agricultural/non-forest use. The project would have no impact to agriculture and forestry resources.

e) The project would construct a residential housing development in an infill, developed area. There are no agricultural uses or forest land uses on-site or within the near vicinity of the project. Therefore, the project would not result in the significant conversion of farmland or forest land to a non-agriculture use. No impact would occur.

III. Air Quality

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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 applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project site is located within the San Diego Air Basin (Basin). The California Air Resources Board coordinates and oversees both State and federal air pollution control programs in California. The California State Implementation Plan (SIP) is the document that sets forth the State's strategies for attaining the National Ambient Air Quality Standards. The San Diego Air Pollution Control District (SDAPCD) is the agency responsible for preparing and implementing the portion of the California SIP applicable to the Basin. The SDAPCD has adopted air quality plans to improve air quality, protect public health, and protect the climate. The San Diego Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans and control measures designed to attain and maintain the state standards, while San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS are based on the growth projections of the San Diego Associated of Governments (SANDAG) and

land use plans developed by the cities and by the County. As such, projects that propose growth consistent with city and the County land use plans, and thus consistent with the growth anticipated by SANDAG, would be consistent with the RAQS and SIP. Development consistent with the City's General Plan would be consistent with the RAQS and State Implementation Plan (SIP).

The project site is designated for residential use in the General Plan. The proposed project is a moderately dense residential housing community which would be consistent with the density anticipated in the General Plan and permitted by the Zoning Ordinance. Therefore, the project is consistent with its General Plan designation and site development would not exceed the General Plan growth assumptions in the RAQS and SIP. The project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less-than-significant.

b) Both the State and the Federal governments have established health-based ambient air quality standards for seven air pollutants. These pollutants include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter smaller than or equal to 10 microns in diameter, particulate matter smaller than or equal to 2.5 microns in diameter, and lead. In addition, California maintains ambient air quality standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect public health and welfare.

Project implementation would produce temporary pollutant emissions during construction and long-term operational emissions. Temporary emissions would be generated by construction equipment used for site preparation, grading, paving and building erection activities. Additionally, grading would disturb surface soils and cause a discharge of dust particulates into the air. Exhaust emissions from construction activities would vary daily as construction activity levels and types change. Dust control during clearing and grading operations, including watering, surfactants, shrouding, limited vehicle speeds, surfacing haul roads and other technological measures, would be required in accordance with the rules of the SDAPCD and the regulations of the El Cajon Grading Ordinance. Because construction emissions would be minor and temporary in nature, lasting six or less months in time, less-than-significant impacts would occur.

Operational air pollutant emissions would be those associated with stationary sources, energy sources and mobile sources. Stationary sources associated with the project would come from architectural coatings, landscape equipment, general energy use and solid waste. Energy emissions would come from electricity and natural gas use. Mobile sources would arise due to personal vehicles from residents and guests (estimated to be 56 daily trips). Based on the small project size, project-related long-term operational emissions are expected to be minor and result in less-than-significant impacts.

c) During project construction, toxic air contaminants (TACs) would be produced due to diesel particulate matter associated with heavy construction equipment usage. The San Diego Air Pollution Control District (SDAPCD) Health Risk Assessment protocol recommends that sensitive receptors located within 0.25 miles of a proposed use that emits TACs be considered in an evaluation of TAC-related health impacts. Sensitive receptors include schools, hospitals, resident care facilities, day care centers, or other facilities that may house concentrations of individuals with health conditions that would be adversely impacted by

changes in air quality. Sensitive receptors located beyond the 0.25-mile distance are generally not required to be evaluated due to atmospheric mixing and dispersion of pollutants. Because there are no sensitive receptors within 0.25 miles of the project site, temporary construction-related TACs would not pose an excess health impact to at risk populations. No operational TACs would be produced by the project because of its residential nature and lack of permanent stationary sources that would emit unhealthful emissions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations and less-than-significant impacts would occur.

d) Construction phase odors would be produced as a result of using diesel-power equipment, primarily from equipment exhaust. However, all construction activity would be temporary in nature and would cease to be produced once construction is complete. No other sources of objectionable odors would occur from construction or operation of the residential development project. Less-than-significant impacts are identified.

IV. Biological Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
IV.	BIOLOGICAL RESOURCES. Would the Project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting sites?	☐	☐	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) A Biological Resources Assessment Report was prepared for the project site by Cadre Environmental (2020). Based on field observations, the site is heavily disturbed and contains no suitable habitat for any state and/or federally listed or regionally sensitive wildlife. The disturbed habitat features weedy and ornamental species. However, one federally endangered and Multiple Species Conservation Plan (MSCP) narrow endemic plant, San Diego ambrosia (Ambrosia pumila), was documented near the center of the project site and the potential exists for general nesting birds in the ornamental landscaping. A total of 2,000+ stems were documented within a 0.03-acre area of the 0.4-acre site (refer to Figure 8 in the Biological Resources Assessment Report contained in Appendix A to this Initial Study). Removal of the San Diego ambrosia population is proposed by the project and would constitute a significant biological resources impact. To mitigate for significant impacts to this sensitive plant species, the project would implement **MM BIO-1**, which requires the salvage, translocation, and monitoring of the plants to a predetermined and approved site. In addition, a nesting bird pre-construction survey would be conducted in accordance with **MM BIO-2**. The draft translocation and management plan outlined in the mitigation is contained in Appendix B to this Initial Study. Therefore, with mitigation incorporated into the project, impacts to any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations would be less-than-significant.

b-c) No wetlands or jurisdictional resources regulated by the United States Army Corps of Engineers, California Department of Fish and Wildlife or Regional Water Quality Control Board occur within or immediately adjacent to the project site (Cadre Environmental 2020). Therefore, the project would have no impact to any riparian habitat or other sensitive natural community, and no impact to jurisdictional areas or federal-protected wetlands would occur.

d) The site is in an urbanized area and is not adjacent to an open space or wildlife corridor; nor does the site itself serve as a wildlife corridor or nursery site. No impact related to the movement of wildlife through corridors would occur. Therefore, the project would not substantially interfere with any nearby wildlife corridors or linkages, and no impacts would occur.

e-f) The City does not have an approved MSCP Subarea Plan in place. The project site is not located within a Habitat Conservation Plan or within the vicinity of any local, regional, or state conservation plan. The project would mitigate for impacts to a sensitive plant and general nesting birds through the implementation of MM BIO-1 and MM BIO-2, consistent

with applicable regulations protecting the resources (i.e., federal Endangered Species Act, California Fish and Game Code Sections 3503 and 3513, and the Migratory Bird Treaty Act). Therefore, less-than-significant impacts related to the project's compliance with regional and state conservation plans would occur.

Mitigation Measures

MM BIO-1: **Sensitive Plant.** Prior to construction or ground disturbance activities, a San Diego ambrosia translocation plan (Plan) shall be developed and approved by the City, in consultation with the U.S. Fish and Wildlife Service. The Plan shall be developed by a biologist or botanist with experience with the plant species. The Plan shall include a description of translocation of the species to a suitable receiver site and conservation in perpetuity. The Plan shall be implemented by a qualified biologist. In addition, a habitat management plan (HMP) for the long-term conservation and management of the translocated population shall also be developed. Prior to the receipt of the site development permit, an endowment shall be invested to fund the long-term management in perpetuity.

MM BIO-2: **General Nesting Birds.** Clearing shall occur between non-nesting (or non-breeding) season for birds (generally, September 1 to January 31). If this avoidance schedule is not feasible, the alternative is to carry out pre-construction surveys under the supervision of a qualified biologist experienced with the detection of nests and nesting birds. The pre-construction survey shall entail the following:

A qualified biologist shall conduct a pre-construction nesting bird survey no more than14 days prior to initiating ground disturbance activities. The survey shall consist of full coverage of the proposed disturbance limits and up to a 500-foot buffer area, determined by the biologist and taking into account the species nesting in the area and the habitat present.

If no active nests are found, no additional measures are required.

If "occupied" nests are found, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near fledging) recorded. The biologist shall establish a no-disturbance buffer around each active nest. The buffer area shall be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.

V. Cultural Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
V.	CULTURAL RESOURCES. Would the Project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource as defined in Public Resources Code Section 21083.2 and 21084.1, and CEQA Guidelines Section 15064.5, respectively?	☐	☐	☐	☒
c)	Disturb any Native American tribal cultural resources or human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project area was disturbed in the 1960s when the neighborhood was established and local roads and infrastructure was put in. Although surrounded by residential development, the project site is an urban infill location that remains vacant and has never been developed with structures. Therefore, implementation of the project would not create a substantial adverse change in the significance of a historical resource as defined in Section 15064.5, and no impacts would occur.

b) Due to its prior disturbance and urbanized character, there is a low potential for intact cultural resources on the project site. The potential for the discovery of previously unidentified resources is low given the site disturbances associated with establishing the neighborhood in the 1960s. Therefore, the project would not cause a substantial adverse change in the significance of an archaeological resource, and no impacts would occur.

c) Due to the fact that the project involves ground disturbance, construction activities may have the potential to disturb human remains, including those located outside of formal cemeteries. If human remains are encountered during grading or excavation, the project is required to comply with existing laws related to human remains, including California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5(e). CHSC Section 7050.5 outlines protocol for the inadvertent discovery of human remains, while Sections 7051 and 7052 identify the legal repercussions of removing remains from internment and their improper treatment. Section 7054 exempts the reburial of Native American remains pursuant to Section 5097.94 from the definition of a misdemeanor. Section 7050.5(b) specifies protocol when human remains are discovered. CEQA Guidelines Section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that a coroner be called in to assess the remains. Refer to Response XVIII regarding Tribal Cultural Resources where construction monitoring was requested by local

tribe with cultural affiliation with the project area. The project would mitigate for impacts to a Tribal Cultural Resources through the implementation of **MM TRC-1**. Compliance with existing regulations and implementation of mitigation in this Initial Study would ensure a less-than-significant impact to Tribal Cultural Resources and human remains would occur as a result of the project.

VI. Energy

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VI.	ENERGY. Would the Project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) Construction of the proposed project would result in temporary energy consumption and one-time, non-recoverable energy usage associated with construction of structures, utilities, driveways and landscaping. Energy consumption as a result of construction of the proposed project would primarily consist of the consumption of fossil fuels as a result of use of off-road construction equipment, movement of soil, and use of on-road vehicles for worker commuting and vendors. The temporary demand for energy associated with construction would not, however, be excessive because of the minor amount of proposed construction. This usage would cease upon completion of the project construction activities.

The long-term operational energy demand of a 7-unit townhome project would not be excessive because of the incorporation of energy efficient project features. The project's operational energy usage would be minimized through compliance with the California Building Code Standards (i.e., California Code of Regulations [CCR] Title 24) and California Green Building Standards Code. Therefore, the project would not result in an environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Less-than-significant impacts would occur.

b) To minimize its energy demand, the project would comply with CCR Title 24 and California Green Building Code Standards, as described above in Response VI.a. Because the project would integrate design features to comply with the applicable regulations pertaining to energy efficiency, less-than-significant impacts would occur and the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including the California Energy Commission's Integrated Energy Policy Report (IEPR).

VII. Geology and Soils

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving?				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Map issued by the State Geologist for the area or based upon on other substantial evidence of a known fault?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death as follows:

i) The site is located in a seismically active area, as is the majority of southern California, and the potential for strong ground motion is considered significant. Major known active faults in the region consist generally of in echelon, northwest striking, right-lateral, strike-

slip faults. These include the San Andreas, Elsinore, and San Jacinto faults located northeast of the site, and the San Clemente, San Diego Trough, and Agua Blanca-Coronado Bank faults located over 30 miles from the site. The tectonic setting of the metropolitan San Diego area includes major north and northwest striking fault zones. The site is not included in any Alquist-Priolo Act Earthquake Fault Zones and there are no known major or active faults on or in the immediate vicinity of the site. The nearest active faults are the Rose Canyon fault zone, the Coronado Bank Fault Zone, and the Elsinore Fault, located approximately 10, 26, and 40 miles from the site, respectively. The effects of seismic shaking on the project would be avoided by adherence to the California Building Code (CBC). Since no active faults are known to transect the project site, ground surface rupture is unlikely. For this reason, impacts related to strong seismic ground shaking and rupture would be less-than-significant.

ii) Due to its presence in a seismically active area, the project would be subjected to a moderate to severe risk associated with ground shaking related to a large-magnitude earthquake on one of the regional faults noted above. Recommendations with regard to foundations, retaining walls and utilities will be provided during building plan review by an engineering geotechnical consultant to address these regional geologic hazards. Incorporation of the site-specific recommendations into the project design, as required by the Grading Ordinance in the El Cajon Municipal Code, would ensure that impacts would be less-than-significant.

iii) Liquefaction potential is based on soil strength and the presence of a shallow water table. The El Cajon Valley generally has a ground water depth of 7 to 12 feet. The project area is underlain by geologically older, dense soil and (granitic) rock with no risk for liquefaction, and no impacts are identified.

iv) Landslides in the El Cajon Valley are known to occur in the western slopes within the Friars Formation. Located in the eastern portion of the valley, the project site and surroundings are topographically level with no slopes and is underlain by geologic formations that are granitic in origin; therefore, there is little to no risk for ground instability due to landslides, and no impacts would occur.

b) Grading is proposed to implement building pads and drive areas, as well as other site improvements. The project is required to comply with the City's Standard Urban Storm Water Mitigation Plan and would implement standard stormwater best management practices (BMPs) during construction, such as berms, gravel bags and/or sand bags, silt fencing, straw waddles. The project would construct post-construction BMPs, including biofiltration basins and landscaping, to control soil erosion. The project is also required to comply with the City's Grading Ordinance requirements with regard to erosion control. Implementation of standard BMPs and compliance with the erosion control requirements contained in the City's Grading Ordinance would ensure less-than-significant impacts associated with soil erosion would occur.

c) The project area is underlain with bedrock that is granitic in character. Because of the granitic nature of the site's subsurface, the potential for ground lurching due to a seismic event is very low to non-existent. Similarly, the underlying formation does not present a risk with regard to seismic settlement. Due to the absence of liquefaction potential (as noted

above under Response VI.a.ii) and flat surrounding topography, there is no potential for lateral spreading. Therefore, no impacts related to unstable geology or soils are expected.

d) With silty soils with light clay occurring in the project area, a low expansive potential is expected. As part of the building permit process, a soils engineer would make recommendations to address any unique, site-specific soil conditions, in accordance with the City's Grading Ordinance. Therefore, less-than-significant impacts would occur.

e) Septic systems would be connected to the local sewer system. No impact is identified since no septic systems are proposed.

f) The project area is underlain by granite-like formational materials which have no potential for fossil resources and are not anticipated to reveal paleontological resources when disturbed by construction. Development of the project would not have the potential to reveal paleontological resources because it would involve excavation and grading at depths that would impact underlying formations with no paleontological potential. Therefore, there would be no impacts to paleontological resources.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The City adopted its *Sustainability Initiative* in 2020, which is a plan to reduce greenhouse gas (GHG) emissions within its jurisdiction. The City does not have a qualified Climate Action Plan (CAP) and has not established a screening threshold for GHG emissions. As such, a project-specific greenhouse gas study (Bluescape Environmental 2021) was prepared using the County of San Diego *Guidelines for Determining Significance for Climate Change* and a screening threshold determined by the California Air Pollution Control Officers Association (CAPCOA) as an emission level that would indicate project emissions would result in less than cumulatively significant impacts and would not interfere with the ability of the state to achieve state reduction targets. With the passage of SB 32, the state extended and increased its commitment to GHG reductions to 40 percent below 1990 levels by 2030. To accomplish this objective, the CAPCOA 900 MT CO_2e screening threshold was reduced annually by 5 percent for projects with operational years of 2021 to 2030, to demonstrate compliance with the SB 32 target by 2030. In the case of the proposed project, which would become

operational by 2023, a screening threshold of 765 MT CO_2e is used for assessing the project's GHG emissions (Bluescape Environmental 2021).

The project's GHG emissions sources include construction (off-road vehicles), mobile (on-road vehicles), energy (electricity and natural gas), area (fireplaces, consumer products [cleansers, aerosols, solvents], landscape maintenance equipment, architectural coatings, household consumer products), water and wastewater, and solid waste sources. In the case of the proposed Oakdale Townhomes project, GHG emissions estimates were calculated using the California Emissions Estimator Model (CalEEMod) software. The project-specific GHG study estimated the project's construction emissions would be 4.36 MT CO_2e amortized over 30 years, while the operational GHG emissions were estimated at 63.23 MT CO_2e per year. When construction and operational emissions are combined and compared to the adjusted screening threshold of 765 MT CO_2e, it was determined that the project would produce 67.6 MT CO_2e per year, less than the screening threshold. Therefore, the project would not generate a substantial increase in GHG emissions and its impacts on climate change would be less-than-significant.

b) As discussed in Response VII.a, the project would generate GHG emissions that would not be cumulatively considerable. Further, the project's GHG emissions would decline in the future based on regulatory forecasting. Vehicle emissions would continue to decline due to regulations that increase vehicle efficiency, and the development of alternative fuel vehicles and technologies. GHG emissions associated with energy and the transportation and treatment of water would continue to decrease, as San Diego Gas & Electric continues to increase renewable sources of energy in accordance with Renewable Portfolio Standard goals. Given the reasonably anticipated decline in project emissions, due to existing regulatory programs, once the project is fully constructed and operational, the project emissions would continue to decline in line with the GHG reductions needed to achieve the state's interim (2030) and horizon-year (2050) goals established by AB 32 and SB 32. The project would not conflict with any local or state plan, policy, or regulation aimed at reducing GHG emissions from land use and development. Impacts would be less-than-significant.

IX. Hazards and Hazardous Materials

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, emission or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a–b) The project consists of residential development that would introduce household-scale chemical usage to the site but would not require the routine transport, use, emit or disposal of hazardous materials. The minor quantities of hazardous materials and waste associated with seven townhomes would not be substantial or prone to accidental releases. During construction activities, hazardous materials may be present on site (such as fuels, lubricants, solvents, etc.); however, these materials would be present in small quantities and typical of those used in construction activities. These materials would be stored, handled, used, and disposed of by the construction contractor in accordance with applicable regulations and requirements, and would not create a significant hazard to the public or environment. A less-than-significant impact would occur.

c) The nearest school is Madison Avenue Elementary School, which is situated approximately 0.27 miles southeast of the project site. Short-term construction emissions would be generated by the project, which would include diesel particular matter; however, as noted in Response III.c, the prevailing wind direction is westerly and any construction emissions produced by the project would not be directed toward the school, would be temporary in nature and would cease when construction is complete. In the long-term, a residential land use such as the project that would not emit or handle acutely hazardous materials or waste. Therefore, a less-than-significant impact associated with the emission of hazardous materials within 0.25 miles of a school would occur.

d) The project site is vacant and has never been developed with urban uses. Based on a review of the California Department of Toxic Substances Control EnviroStor database, it is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts would occur.

e) In January 2010, the Regional Airport Authority adopted the Gillespie Field Airport Land Use Compatibility Plan (ALUCP). The project site is over 3.0 miles east of the airfield and not located in the Airport Influence Area (AIA) for the facility. Based on the ALUCP Exhibit III-5, the site is not located in any defined safety zones or avigation easement areas and, according to ALUCP Exhibit III-1 the project site is outside the defined noise contours for the airport as well. There are no other public airports or airstrips in the project area. No impact would occur from safety hazards or noise from regional aircraft operations.

f) Emergency access to and from the site would occur via Oakdale Avenue. A temporary lane closure adjacent to the project site or along nearby Durham Road would be required to install utility connections and relocate existing sewer lines. The lane closures would be temporary and not result in a significant access restriction as emergency vehicles would still be able to access the area. The project would comply with the El Cajon Fire Department's requirements with regard to emergency access. Compliance with the Fire Department's review of the site plan would result in adequate emergency access, and no impacts would occur.

g) The project site is surrounded by developed land and the project is proposed as an urban infill development. The nearest area mapped as Very High Fire Hazard Severity Zone (VHFSZ) is over 1 mile east of the project site; therefore, the project site does not have a direct interface with wildlands. The project design would comply with all fire code requirements in the El Cajon Municipal Code and would be reviewed by the El Cajon Fire Department for compliance with the regulations. Upon review of the project design by City staff to verify compliance with the applicable regulations, the project would have no impacts to residents related to wildfire risk.

X. Hydrology and Water Quality

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

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:				
	i) Result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	iv) impede or redirect flood flows?	☐	☐	☐	☒
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project site is vacant and grading is proposed to implement building pads and driveways, as well as other site improvements. The project would construct standard stormwater BMPs during and after construction to control erosion and prevent water quality impacts. The project is also required to comply with the El Cajon Municipal Code with regard to erosion control. Implementation of standard best management practices (BMPs) and compliance with the erosion control requirements contained in the City's Jurisdictional Runoff Management Program and Storm Water Ordinance would ensure less-than-significant water quality impacts associated with soil erosion would occur.

The project would increase the impervious area of the site by 9,569 SF (or 55% of the site). Post-construction runoff would have the potential to contain contaminants that are typically associated with urban development. Post-construction stormwater runoff would be managed and treated by implementing low impact development measures. Implementing BMPs would ensure project compliance with local and regional MS4 Permit (California Regional Water Quality Control Board San Diego Region Order No. R9-2015-0100) requirements for stormwater management and water quality treatment. Therefore, the project would not violate any water quality standards or waste discharge requirements or

otherwise substantially degrade surface or ground water quality. Less-than-significant impacts would occur.

b) The project does not propose the use of local groundwater supplies or the construction of groundwater wells. The project would rely on water service from the Helix Water District and not ground water supplies. Development of the project site, specifically residential buildings, private streets/driveways, sidewalks, and parking spaces, would increase impervious surfaces by 9,569 SF, leaving 7,836 SF to be covered with pervious surfaces, such as landscape areas, water quality basins and common open space. Infiltration of runoff through those pervious surfaces and biofiltration BMPs would continue upon development of the project site. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Less-than-significant impacts would occur.

c) Drainage patterns on the project site would not be substantially altered by the project, including through the alteration of a course or a stream or river or through the addition of impervious surfaces as follows:

   i) As described in Response X.a, the project would implement BMPs during and after construction to prevent substantial erosion or siltation on- or off-site. Less-than-significant impacts would occur.

   ii) The on-site BMPs would be sized to accommodate 100-year flows with inlets directing on-site flows to biofiltration basins. Flows would then be conveyed to the local storm drain system that surrounds the project site. The proposed drainage system would control runoff volumes and velocities within the site prior to their discharge into the City's storm drain system. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Less-than-significant impacts would occur.

   iii) The project would implement BMPs during and after construction prior to discharging runoff to the off-site storm drain system. The proposed on-site drainage and water quality improvements integrated into the project and described in Responses X.a and X.b would ensure that the 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. Less-than-significant impacts would occur.

   iv) The nearest mapped 100-year floodway is associated with Forrester Creek, approximately 380 feet north of the project site. Therefore, the site is outside the floodplain and all runoff produced in the post-construction condition would be detained and treated before being directed to the local storm drain system. No changes to existing drainage patterns are proposed. Therefore, the project would not impede or redirect flood flows, and no impacts are identified.

d) In the proposed condition, runoff from the site would be conveyed over hardened surfaces before being collected by storm drain and discharged. The project site is outside any defined 100-year floodplains and located over 20 miles inland from the Pacific Ocean, over 7 miles

south of San Vicente Reservoir and approximately 9 miles southwest of Lake Jennings. Due to these intervening distances, there would be no drainage or water quality impacts related to flood hazards or inundation by tsunami or seiche.

e) The proposed installation of BMPs designed in accordance with the requirements of the City Jurisdictional Runoff Management Plan and Storm Water Ordinance would ensure project compliance with local and regional stormwater control regulations (General Construction Permit Order No. 2009-009-DWQ and Municipal Permit No. R9-2015-0100/R-9-2013-0001). The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Less-than-significant impacts would occur.

XI. Land Use and Planning

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XI.	LAND USE AND PLANNING. Would the Project:				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project would develop a residentially-designated property which is surrounded by existing residential properties and buildings. The property is an urban infill site which is anticipated to be developed with low-density residential uses as noted in the General Plan, refer to Response XI.b. Construction of the project would not physically divide an established community, but rather complete the development of a residential neighborhood as anticipated in the General Plan. No impact would occur.

b) The Land Use Element of the General Plan designates the site for low-density residential (LR). The LR designation allows for up to 10 du/ac. The RM-2200 zoning for the project site allows for moderately dense residential development with 2,200 SF minimum lots. The project would construct 7 townhomes on 0.4 acres, which would conform to the zoning designation for the property which allows for up to 8 units on site. The project would also conform to the development regulations in the RM-2200 zone related to building height limits, setbacks and lot coverage. Properties that are consistent with the zone are consistent with the General Plan.

With regard to land use compatibility, the City's Land Use Compatibility in Noise Impact Areas table identifies different land uses within the City as well as normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for

different land uses. The City uses the day-night level (Ldn) as the measure for assessing transportation noise impacts with respect to land use planning. The Ldn is a 24-hour A-weighted decibel [dBA] average sound level obtained after the addition of 10 dB to the sound levels occurring between 10 p.m. and 7 a.m. Adding 10 dB to the nighttime hours accounts for the added sensitivity of humans to noise during these time periods. The General Plan establishes 60 dB Ldn as compatible with outdoor single family residential use areas, and 65 dB Ldn as conditionally compatible. Proposed buildings must (or reduce) exterior noise levels to achieve an interior noise level of 45 dB Ldn or below in habitable rooms. This regulation is enforced by the City's Building Inspection Department as part of the permit process, which requires a noise specialist conduct an interior noise analysis when the exterior noise levels are in excess of 60 dB to identify the building materials needed to comply with the 45 dB Ldn requirement.

The primary noise source in the project area is from vehicles travelling along I-8, which is approximately 390 feet north of the project site. Additional minor noise is produced from local vehicles travelling past the site on Oakdale Avenue. The section of freeway closest to the project site features an 8 to 10-foot high noise wall, which reduces noise exposure generated from I-8 to the project site. The outdoor use areas for the proposed project would be situated in the backyards and private open space that occur on the west, east and south sides of the project shown on Figure 1. The proposed two-story residential structures would further block any noise produced by the freeway. Given the distance from the freeway, presence of a noise wall and the existing and proposed intervening structures, outdoor usable areas would comply with the Noise Element policies of the General Plan.

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

XII. Mineral Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XII.	MINERAL RESOURCES. Would the Project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a–b) There are no known mineral resources of significant value or categorized as locally important on the project site or within the City. As a result, there would be no impact to mineral resources associated with project implementation.

XIII. Noise

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XIII. NOISE. Would the Project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) Temporary, short-term noise would be produced during construction of the project. Construction personnel and construction equipment and materials deliveries to the site would incrementally increase noise levels on local roads leading to the site. Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance (passing trucks), the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing hourly/daily traffic volumes on E. Main Street (i.e., 20,800 ADT). Along Oakdale Avenue, the noise increase would be greater due to the lower volume of traffic; however, the number of construction vehicles accessing the project site would be temporary, vehicles speeds would be low, and the volume of traffic would not be substantial in nature due to the small project size. Therefore, short-term, construction-related noise impacts associated with worker commute and equipment transport to the project site would be less-than-significant.

Noise generated during equipment usage during grading, site preparation, utility relocation, and building erection on the project site would also result in short-term noise increases in ambient noise levels over the course of the construction schedule. The City Noise Ordinance

specifies maximum 1-hour average sound level limits at the boundary of a property. These maximum 1-hour sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. For residential uses, these limits are 60 dBA 1-hour sound level (Leq) between 7 a.m. and 7 p.m., 55 dBA Leq between 7 p.m. and 10 p.m., and 50 dBA Leq between 10 p.m. and 7 a.m. A standard condition from the City requires adherence to these noise standards during project construction; therefore, temporary increases in ambient noise during construction would be less-than-significant.

In terms of permanent noise, the project would generate traffic noise by adding 56 daily trips to local roads in the project area, assuming the Institute of Traffic Engineers (ITE) trip rate of 8 trips per unit (SANDAG 2002). Project traffic would primarily travel utilize Oakdale Avenue and E. Main Street, among other roads in the local project area. A 3 dB change in noise levels is a perceptible change to the general population. In order to increase ambient road noise by 3 dB, a project would have to double the amount of traffic on that road. E. Main Street currently carries 20,800 daily trips; no data are available for Oakdale Avenue since it is a minor local road (Chen Ryan 2016). The amount of new vehicle trips attributable to the project would be very minor in comparison to the amount of existing traffic on nearby roads. Therefore, the incremental increase in noise along roads in the project area attributable to project traffic would be imperceptible to local residents. A less-than-significant permanent impact to ambient noise levels would occur as a result of the project.

b) Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible, but without the effects associated with the shaking of a building there is less adverse reaction. The greatest levels of vibration are anticipated to occur during the site preparation phase for the project, which is expected to occur over a two-week period and require the operation of heavy construction equipment, such as grader and/or bulldozer. All other construction phases are expected to result in lower vibration levels. The adjacent properties contain residential buildings which do not contain vibration sensitive equipment but could be exposed to groundborne vibration during construction. Because of the short-term temporary and minor nature of the construction activities, in particular the grading operations, the project would not generate excessive groundborne vibration or groundborne noise levels. Less-than-significant impacts would occur.

c) No private airports occur in the project vicinity. The City is exposed to aircraft noise from operations at the Gillespie Field Airport, located over 3 miles northwest of the project site. Based on the ALUCP Exhibit III-1, the site is situated well outside the 60 dBA CNEL noise contours for the airport. Thus, aircraft noise would not adversely impact the occupants of the project site, and no impacts are identified.

XIV. Population and Housing

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) The project is proposed on residentially-zoned, infill site that is surrounded by residential development. The proposed townhomes would be consistent with the underlying density and population permitted by the City's General Plan and Zoning Ordinance. No new public roads are proposed and all utility infrastructure would be sized to meet the needs of the project. Therefore, the population growth associated with the project would not be in excess of what is assumed for the project site and would not induce substantial unplanned population growth in the area. No impacts would occur.

b) The project site is currently vacant and would not displace any existing units or residents. Therefore, no impacts to people or housing would occur.

XV. Public Services

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XV.	PUBLIC SERVICES. 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 objectives for any of the following public services:				
a)	Fire protection?	☐	☐	☒	☐
b)	Police protection?	☐	☐	☒	☐
c)	Schools?	☐	☐	☒	☐
d)	Parks?	☐	☐	☒	☐
e)	Other public facilities?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) Fire protection services for the City are provided by Heartland Fire and Rescue Department, which maintains staff at eight fire stations. El Cajon Fire Station No. 8 at 1470 E. Madison Avenue would serve the project site and is located approximately 0.5 miles away. The site would be accessible by fire and emergency equipment from Oakdale Avenue. The project's design features include a fire hydrant, fire sprinklers, building spaces to allow access, and smoke alarms. The increase in demand for fire protection services caused by the project would be minor and not necessitate the construction of new or expanded facilities. Therefore, there would be no environmental impacts associated with serving the project site from existing fire and emergency response facilities. Less-than-significant impacts would occur.

b) Police protection for the City is provided by the El Cajon Police Department from its headquarters at 100 Civic Center Way. Residential density and population associated with the project would be consistent with the zoning for the site. The demand for police protection services would be served from the existing police protection facilities. The project would not result in the need for new police facilities. Therefore, there would be no environmental impacts associated with serving the project site from existing police protection facilities. Less-than-significant impacts would occur.

c) The project site is located within the Cajon Valley Union School District (CVUSD) and the Grossmont Unified High School District (GUHSD) and the project would likely house families with school-age children. Due to limited number of students generated by 7 townhomes, the proposed project would not result in a substantial increase in demand for schools that would create a need for new or expanded public school facilities. Pursuant to Government Code Section 65995 et seq., the project would pay all applicable school fees at building permit. Payment of such fees avoids significant impacts to schools as a matter of state law.

No physical impacts to school facilities would occur as a result of project implementation. Thus, the students generated by the project would be accommodated by the local schools without the need to physically alter or expand facilities. Less-than-significant impacts would occur.

d) While the project would generate approximately 18 new residents, the proposed development is consistent with the land uses planned for the area and included in the long-range parkland forecasts for El Cajon. As noted below under Response XVI.a, the increase in demand for parks would be minor and the project incorporates a private common area amenity that residents would be able to use in addition to local parks. In addition, new development in the City is assessed a park-in-lieu fee to offset demands for service. Park impacts would be less-than-significant.

e) The project would result in an incremental increase in demand on library services. As discussed above, the construction of 7 townhomes is consistent with the land uses planned for the site and would not result in substantial adverse impacts associated with the need for new or altered public facilities. Less-than-significant impacts would occur.

XVI. Recreation

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project involves the construction of 7 townhomes which would house approximately 18 new residents. The project design features a 1,996 SF common open space area for private use by residents. The on-site facilities would offset the demand for recreation facilities in the City. Project residents would incrementally increase the demand for park and recreation facilities in the City. However, the increase in demand would be small in comparison to the greater population and would not result in substantial deterioration of existing City parks and recreation facilities. Less-than-significant impacts are identified.

b) The proposed common open space area would be integrated with the residential housing development. No off-site recreation or park facilities would need to be constructed to serve

the needs of the proposed residents. Therefore, no adverse physical impact on the environment would occur and less-than-significant impacts are identified.

XVII. Transportation

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XVII.TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) The project would be consistent with the projected traffic in the area due to its consistency with the site's residential (RM-2200) zoning. As a local road, Oakdale Avenue does not contain any transit or alternative transportation facilities; however, within walking distance of the site are transit and bicycle lanes along E. Main Street. The project would not cause any changes to major roads or bicycle facilities in the area. The project would not conflict with any adopted programs, plans or policies related to the local circulation system. Less-than-significant impacts would occur.

b) The project would generate 56 average daily trips (ADT) based on the ITE trip generation factor for multi-family residential uses (i.e., 8 trips per unit). The City has not adopted guidelines for conducting either screening level or full vehicle miles traveled (VMT) analysis in accordance with Senate Bill 743. Therefore, the San Diego Region Guidelines prepared by the ITE were utilized to determine if the project has the potential for VMT impacts (ITE 2019). Based on the ITE guidelines, a project that is consistent with the General Plan designation and generates less than 2,400 ADT would not require a VMT analysis. Based on the project generating 56 ADT, a VMT analysis is not necessary for the Oakdale Townhomes. Future residents would be able to use the sidewalks in the project area to access transit routes along E. Main Street, which is less than 0.25 miles west of the project site. Bike routes occur nearby along Madison Avenue. Access to transit and the ability to walk and bike through the area would also minimize the project's VMT. Therefore, the project's VMT impacts are presumed to be less-than-significant.

c) The project would construct a new driveway access to Oakdale Avenue as shown in Figure 2. No changes to off-site streets are proposed. The configuration of the driveway would comply with the City's engineering standards and would not create a geometric design feature that would substantially increase hazards in the project area. Impacts would be less-than-significant.

d) Emergency access to and from the site would occur through the new driveway along Oakdale Avenue. The project would comply with the Fire Department's requirements and would not affect emergency access. No impacts would occur.

XVIII. Tribal Cultural Resources

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

Project Impacts and Mitigation Measures

a)– The project area was disturbed in the 1960s when the neighborhood was established and local roads and infrastructure was put in. Although surrounded by residential development, the project site is an urban infill location that remains vacant and has never been developed with structures. Therefore, implementation of the project would not create a substantial adverse change in the significance of a historical resource as defined in Public Resources Code Section 5020.1(k), and less-than-significant impacts would occur.

b) The Barona Band of Mission Indians, Jamul Indian Village of California, and Mesa Grande Band of Mission Indians requested to be informed through formal notification of proposed projects within El Cajon under the provisions of AB 52. A formal notification letter containing a written description of the project, a project map, and lead agency contact information was

sent to the authorized representatives on March 16, 2021in accordance with Public Resources Code Section 21080.3.1. A request for consultation was received from The Barona Band of Mission Indians during the 30-day period. The Barona Band of Mission Indians requested a Native American Monitor/Consultant be present during earth moving activities. The project would mitigation for potential impacts to Tribal Cultural Resources through the implementation of MM TCR-1. Therefore, less-than-significant impacts related to Tribal Cultural Resources would occur.

Mitigation Measures

MM TCR-1: **Unknown Tribal Cultural Resources.** The following procedures shall be undertaken during ground-disturbing activities:

a) A Native American Monitor/Consultant shall be present during ground-disturbing activity for project construction, including but not limited to site clearing, grubbing, trenching, and excavation, for the duration of the proposed project or until the Native American Monitor/Consultant determines monitoring is no longer necessary. The monitor shall prepare daily logs and submit weekly updates to the Project Planner at the City regarding the activities observed. In the event that previously unidentified Tribal Cultural Resources are encountered during project construction, the significance of the discovery shall be assessed for significance in accordance with industry standards.

b) If the resource is determined to be significant, the Native American Monitor/Consultant shall submit a data recovery program and obtain written approval from the City prior to its implementation. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.

c) If human remains are discovered, work shall halt in that area and procedures set forth in the California Public Resources Code (section 5097.98) and California Health and Safety Code (section 7050.5) shall be undertaken.

d) At the completion of monitoring, the Native American Monitor/Consultant shall prepare a monitoring report to document the findings during the monitoring effort for the proposed project. The report shall include the monitoring logs completed for the proposed project and shall document any discoveries made during monitoring. The monitoring report shall be submitted to the City and The Barona Band of Mission Indians.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a–c) The project would be located within an urbanized infill site that already has close access to water, wastewater, stormwater, electrical, natural gas and telecom infrastructure. Wastewater and stormwater services are provided by the City. The project would connect with existing sewer mains in the project area and would relocate two sewer lines that serve adjacent properties into Durham Road adjacent to the homes they serve. Water service would be provided to the project through new water line connections in Oakdale Avenue and would be supplied by the Helix Water District. The project would develop fewer than 500 units; thus, the project is not required (pursuant to Senate Bill 221) to conduct a water supply assessment. While the project would result in an incrementally greater demand for water, wastewater, stormwater treatment and other utilities compared to the existing condition, the magnitude of the proposed 7 residential units would be an incremental increase in demand for services that would not result in the need for new or expanded facilities. No significant environmental effects would occur and less-than-significant impacts are identified.

d–e) The project would result in the construction of 7 residential units that would generate solid waste during construction and its long-term operation. The resident population would be consistent with the City's projections as would the solid waste generated by the project. Although the project would generate a higher level of solid waste than the existing use of the site, compliance with the applicable provisions of the El Cajon Municipal Code would ensure that both short-term and long-term project-level impacts would not occur. For construction, the City encourages applicants for demolition and building permits to divert at least 65% of the waste generated on site. For operational waste, the City has granted an exclusive franchise agreement to EDCO to collect, transport, recycle, and dispose of all solid waste generated at residential premises within the City. Current services provided by EDCO include the provision of mandatory three-cart collection services to all residential properties. Three-cart collection requires residents to sort their solid waste into three categories: non-recyclable solid waste; recyclable material; and green waste.

The project would comply with the City's implementation of the Source Reduction and Recycling Element (SREE), required pursuant to the State Legislature's Integrated Waste Management Act, which mandated that all cities reduce waste disposal in landfills from generators within their borders. The incremental increase in solid waste associated with the project would not cause impacts on the City's waste management goals. Therefore, impacts would be less-than-significant.

XX. Wildfire

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XX.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) Emergency access to and from the site would occur via Oakdale Avenue. The project would comply with the El Cajon Fire Department's requirements with regard to emergency access. Compliance with the Fire Department's review of the site plan would result in adequate emergency access, and no impacts would occur.

b) The project site is surrounded by developed land and the project is proposed as an urban infill development. The nearest area mapped as VHFSZ is over 1 mile east of the project site; therefore, the project site does not have a direct interface with wildlands. The project design would comply with all fire code requirements in the El Cajon Municipal Code and would be reviewed by the El Cajon Fire Department for compliance with the regulations. Upon compliance with the applicable regulations, the project would have less-than-significant impacts to residents related to wildfire risk.

c) The project would not 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. All improvements would occur on the project site and no impact to the environment would occur related to fire infrastructure is identified.

d) The project site is situated in an urbanized area in the eastern portion of El Cajon Valley and does not have a direct interface with wildlands or natural drainages. Therefore, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

The following are Mandatory Findings of Significance in accordance with CEQA Guidelines Section 15065.

a) Although the project would impact a sensitive plant and has the potential to impact nesting habitat for avian species, the site is considered developed/disturbed and the project would not have the potential to substantially degrade the quality of habitat for wildlife species or plant species. As detailed in this Initial Study, impacts to sensitive species would be less-than-significant with mitigation incorporated. In addition, due to its disturbed and urbanized character, there is a no potential for intact cultural resources on the project site and the highly developed context of the project site limits the potential for the discovery of previously unidentified resources as well. Impacts to unknown Tribal Cultural Resources would be less-than-significant with mitigation incorporated. Therefore, the project would not cause a substantial adverse change in the significance of a prehistoric or historic resource.

b) As documented in this Initial Study, the project is proposed on an urban infill location and would result in less-than-significant impacts with mitigation incorporated for biological resources and Tribal Cultural Resources. All other impacts would be either less-than-significant or no impact. Mitigation would be required to reduce the project's impacts to biological resources and Tribal Cultural Resources to a less-than-significant level, which would also ensure it does not contribute to cumulative impacts. As such, the project would not contribute to potentially significant cumulative environmental impacts.

c) As discussed in this Initial Study, there are no hazardous conditions on the project site or in the surrounding area. Construction activities would not create hazardous conditions that would significantly directly or indirectly impact human beings. Any hazardous materials used at the site or removed from the site as part of the construction process would be handled in accordance with applicable regulations for the transport, use, storage, and disposal of such materials, ensuring that no substantial adverse effect on human beings would occur. As described in this Initial Study, the project would not result in significant long-term impacts associated with air quality, geology, hazards or hazardous materials, hydrology/water quality, or noise, and as such, would not result in an adverse effect on human beings, either directly or indirectly. Impacts would be less-than-significant.

REFERENCES

Bluescape Environmental

2021 *Greenhouse Gas Study Results for Project: Oakdale Townhomes, Oakdale Ave., El Cajon, CA*, June 18.

Cadre Environmental

2020 *Biological Resources Technical Report for the Oakdale Avenue Project Site, City of El Cajon, San Diego County, California*, December.

California Department of Forestry and Fire Protection (CAL FIRE)

2020 Fire Hazard Severity Zones, El Cajon.

California Air Pollution Control Officers Association (CAPCOA)

2008 *CEQA and Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to CEQA*, January.

California Department of Conservation

2021 California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/.

California Department of Toxic Substances Control

2021 EnviroStor Mapping database. https://www.envirostor.dtsc.ca.gov/public/search.

California Energy Commission

2020 *2019 Integrated Energy Policy Report*. CEC-100-2019-001-CMD, November.

Chen Ryan

2016 *El Cajon Housing Element Rezoning Program Traffic Impact Study*.

City of El Cajon

2020 *City of El Cajon Municipal Code*.

2019 *City of El Cajon Climate Action Plan*. Prepared by Accent and EPIC, July.

2001 *City of El Cajon General Plan*, August 27.

County of San Diego

2009 *Guidelines for Determining Significance of Paleontological Resources*. Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works.

Federal Emergency Management Agency

2012 Flood Insurance Rate Map 06073C1666G, May 16.

Institute for Traffic Engineers (ITE)

2019 *Guidelines for Transportation Impact Studies in the San Diego Region*, May.

San Diego Air Pollution Control District (SDAPCD)

2020 Rules and Regulations Governing Air Quality.

San Diego County Airport Land Use Commission

2010 *Gillespie Field Airport Land Use Compatibility Plan*. Prepared by Ricondo & Associates, January 25.

San Diego Association of Governments (SANDAG)

2002 *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April.

2018 Regional Growth Forecast Assumptions, May 4. https://sdforward.com/docs/default-source/2019-regional-plan/staff-report/050418-rpc-4.pdf?sfvrsn=ed4af865_2.

Schaefer Ecological Solutions

2021 *San Diego Ambrosia Translocation and Management Plan, Oakdale Avenue Townhomes Project*, May.