DRAFT INITIAL STUDY / ENVIRONMENTAL CHECKLIST AND MITIGATED NEGATIVE DECLARATION

FOR

TENTATIVE SUBDIVISION MAP NO. 2022-0008 SPECIFIC PLAN 2023-0003

PREPARED FOR:

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A Perennial Company

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1.0 INTRODUCTION

Overview and Purpose

1.1 Overview

The City of El Cajon (City), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this draft Initial Study (IS)/Mitigated Negative Declaration (MND) for Tentative Subdivision Map 2022-0008 (Project). The proposed project involves the subdivision of approximately 2.45 acres into five residential lots, APN: 493-391-13 and 493-441-35. The Project Site is located in the City of El Cajon on the northwest corner of Avocado Avenue and Cajon View Drive.

Implementation of the proposed project would require approval by the City of El Cajon City Council of a five single-family lot Tentative Subdivision Map and a Specific Plan to permit additional access rights to the Project Site. As part of the City's discretionary review process, the proposed project is required to undergo an environmental review per CEQA guidelines.

1.2 Purpose of a Mitigated Negative Declaration

This Initial Study/ Mitigated Negative Declaration (IS/MND), which evaluates the environmental effects of the proposed project, has been prepared in compliance with CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the procedures for implementation of CEQA outlined in the State CEQA Guidelines (California Code of Regulations Title 14, Section15000 et seq.). CEQA Section 21064 defines a "Negative Declaration" as a well-written statement that briefly describes the reasons that a proposed project would not have a significant and unavoidable impact on the environment and would not require the preparation of an Environmental Impact Report (EIR).

Section 21604.5 defines a "Mitigated Negative Declaration" as a negative declaration prepared for a project when the IS has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the project proponent before the proposed negative declaration is released for public review would avoid the effects or mitigate the effects to a point where no significant effect on the environment would occur and (2) there is no substantial evidence in light of the whole record before the lead agency that the project, as revised, may have a significant effect on the environment.

CEQA Section 21068 defines a significant effect on the environment as a substantial or potentially substantial adverse change in the environment. CEQA Section 21082.2(a) requires the lead agency to determine whether a project may have a significant effect on the environment, based on substantial evidence in light of the whole record.

The City has prepared an IS/MND to address the potential environmental effects associated with the project according to the requirements of CEQA and the State CEQA Guidelines. The IS/MND includes a discussion of the project's effects on the existing environment. Issue areas identified as having potential impacts are discussed further and include mitigation measures that would reduce potential impacts to "less than significant with mitigation incorporated." Project-specific information is discussed below.

2.0 PROJECT DESCRIPTION

2.1 Location and Environmental Setting

The Project Site is situated in the northwest corner of the intersection between Cajon View Drive and Avocado Avenue within the City of El Cajon. Cajon View Drive serves as the southern boundary of the Project and the City of El Cajon. Developed parcels, within the unincorporated area of San Diego County, border the subdivision to the south. Existing single-family residences, within the City of El Cajon, border the parcel to the north and west and Avocado Avenue to the west. The residential Project Site encompasses an angular-shaped parcel, totaling 2.27 acres, identified by APN: 493-391-13. The adjoining 0.18-acre parcel, APN:493-441-35, accommodates Cajon View Drive and is included as part of the development for a total project area of 2.45 acres. The topography in the vicinity of the site exhibits a moderate to steep sloping terrain, featuring a central knoll at an elevation of approximately 630 feet. The remaining portion of the property gradually slopes away to an approximate elevation of 580 feet.

Certain sections of the property area have undergone partial grading, resulting in moderate cut slopes along the northern side of Cajon View Drive to facilitate road construction. Similarly, an approximate 30-foot-high cut slope has been created along the eastern boundary to accommodate the construction of Avocado Road.

The subject parcel is undeveloped. It contains a large number of rock outcroppings and is covered with a mix of disturbed habitat, Diegan coastal sage scrub, Buckwheat scrub, and Ruderal vegetation.

2.2 Project Description

The applicant proposes to subdivide the 2.45-acre Project Site into 5 residential lots that will range from 10,610 square feet to 20,100 square feet. Per the City of El Cajon's RS-14 zone (residential, single-family, 14,000 square feet) the net average minimum lot size is 14,500 square feet. In addition to the development of the 2.27-acre main parcel, the project will also require road and drainage improvements that will impact the adjoining 0.18-acre parcel for a total developed area of 2.45 acres.

PROPOSED LOT DATA (SQUARE FEET)		
Proposed Lot	Gross Area	Net Area
1	23,921	13,110
2	16,870	12,660
3	11,790	10,610
4	16,140	15,210
5	23,305	21,150

Access to the subdivision will be via Cajon View Drive from Avocado Avenue. Cajon View Drive is currently substandard in both width and condition. The project will require the widening and improvement of the roadway through the width of the subject parcel. Cajon View Drive continues west into the adjoining neighborhood. SP 2023-0003 has been prepared to offer an

important secondary access to and through the proposed subdivision and to comply with the City's public road lot frontage policy. In addition to improving Cajon View Drive to a 24-wide paved roadway, the development will construct a 24-foot-wide paved private interior road and cul-de-sac to serve the five new lots.

Public utilities will be extended into the Project Site to serve the new residences. The utilities include pressurized city water from the Helix Water District/Padre Dam Water District and sewer from the City of El Cajon. City water lines are currently located in the western section of Cajon View Drive and a City sewer main lies within Avocado Avenue. Additional grading, trenching, and traffic control will be required to connect the proposed new 8-inch sewer line to the existing sewer main located in the center of Avocado Avenue. Electrical power, provided by San Diego Gas and Electric, is available on adjoining parcels. Per City policy, all utilities will be placed underground.

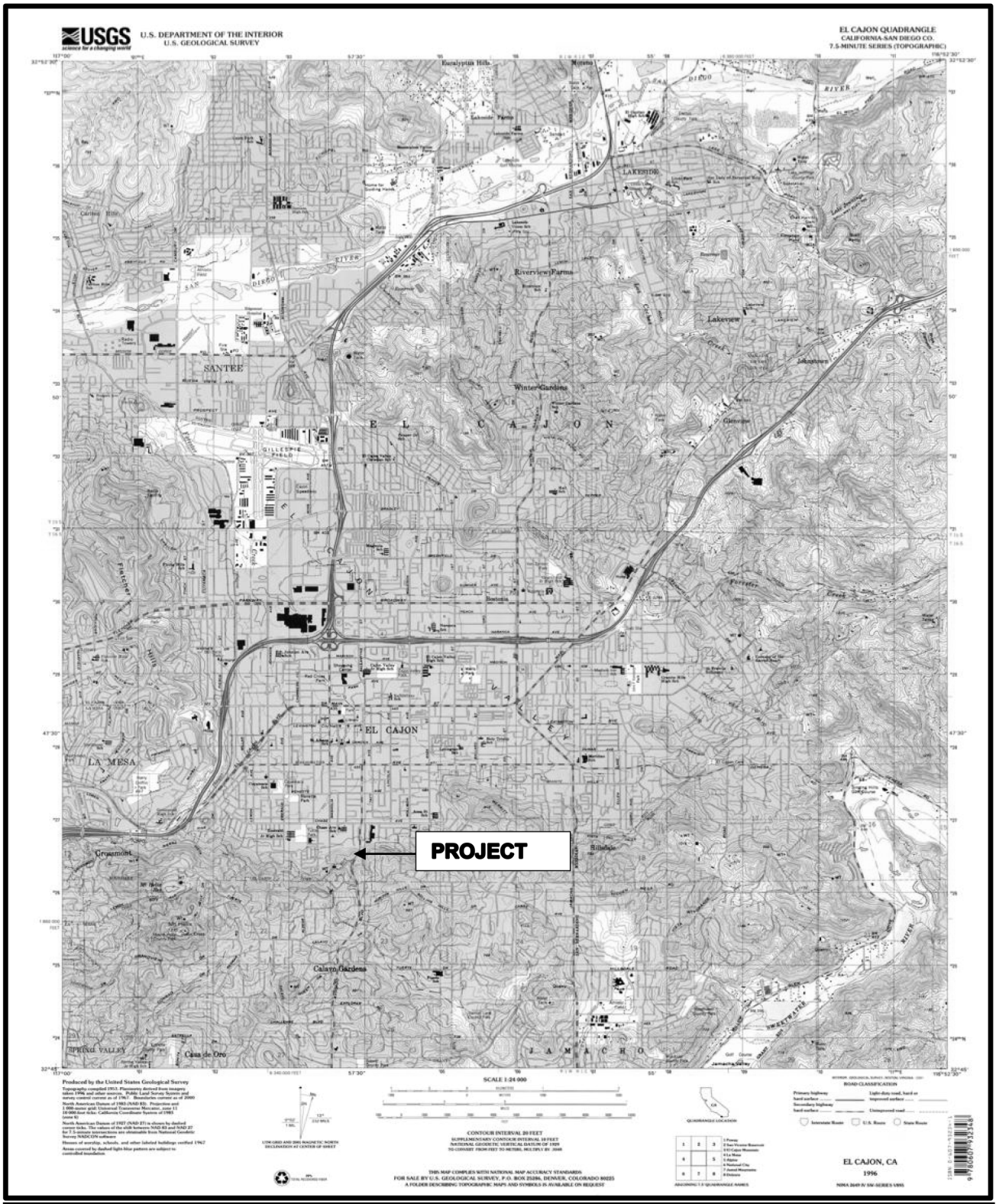
Grading of the subdivision will require the movement of approximately 5,000 cubic yards (cy) of earth. Approximately 4,000 cy of that volume will be exported offsite. A drainage system will be constructed that will include a series of catch basins and pipelines that collect the drainage water from the paved streets and other hard surfaces and direct them into three new biofiltration basins that will be constructed on the south side of Cajon View Drive. The biofiltration basins are designed to capture, hold, and filter the drainage waters. In addition, each lot will have a separate stormwater basin constructed to capture and treat drainage water generated by runoff from each home and associated hard surfaces on site.

Offsite improvements include the construction of a concrete brow ditch on the parcel south of Cajon View Drive and roadway improvements within the Avocado Avenue public right-of-way where the two roadways interconnect. At this time the applicant is proposing the lots will be sold separately for development.

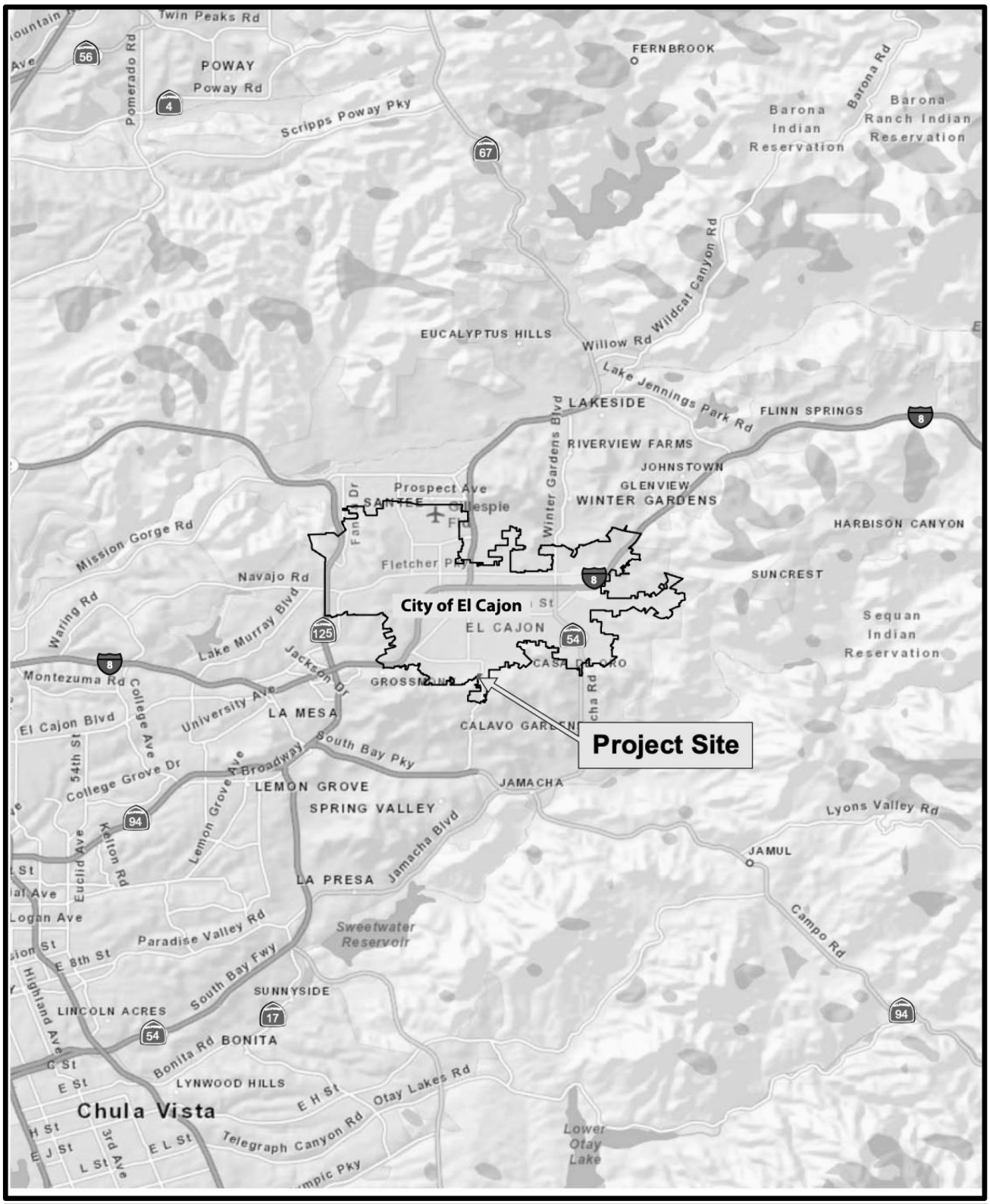
The Project Site is located within the Draft El Cajon Multiple Species Conservation Program (MSCP) Subarea Plan boundary. This Plan has not been adopted and is located outside of the final County of San Diego Biological Resources Core Area. As such, biological impacts associated with the removal of native habitat from the development site will be mitigated offsite utilizing similar habitat at recommended replacement ratios.

2.2 Project Action

To entitle the Project, the applicant is requesting approval by the El Cajon City Council of a tentative subdivision map, a specific plan, and a mitigated negative declaration. Future development of the site will involve the construction of five single-family homes. Each home will be evaluated and permitted through a separate application process.

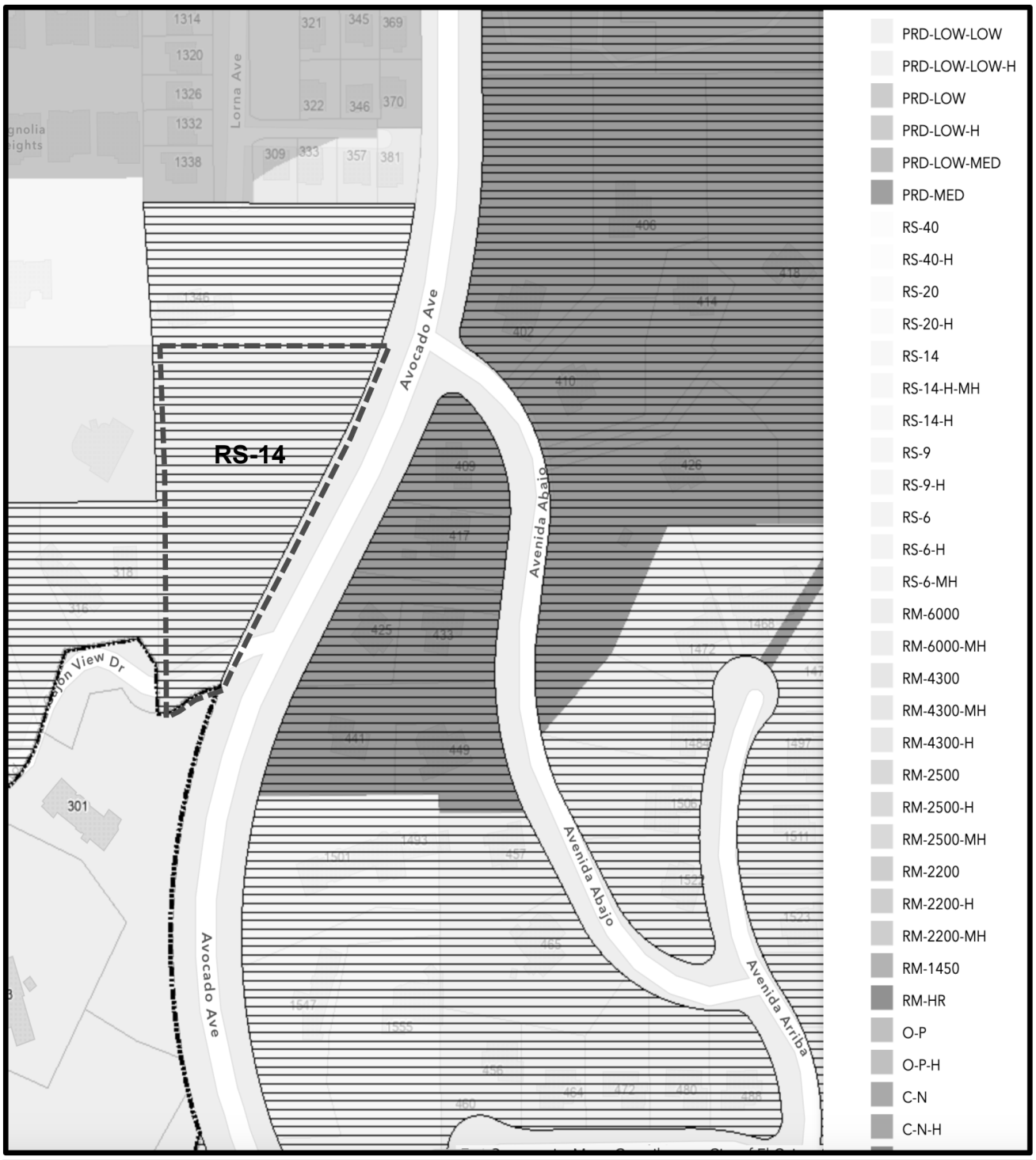


USGS EL CAJON QUADRANGLE MAP	**Figure 1**



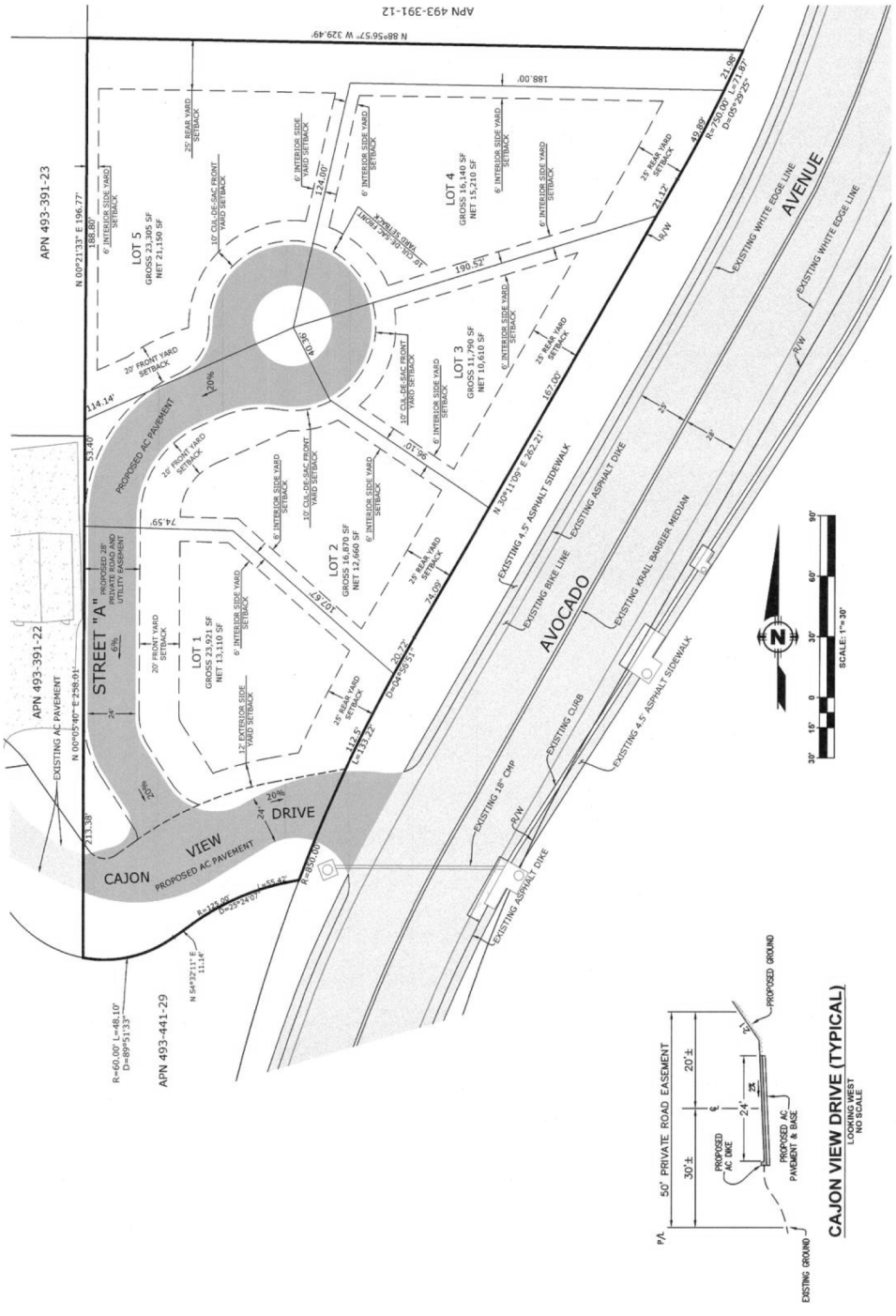
REGIONAL LOCATION MAP	Figure 2

SITE LOCATION MAP	Figure 3

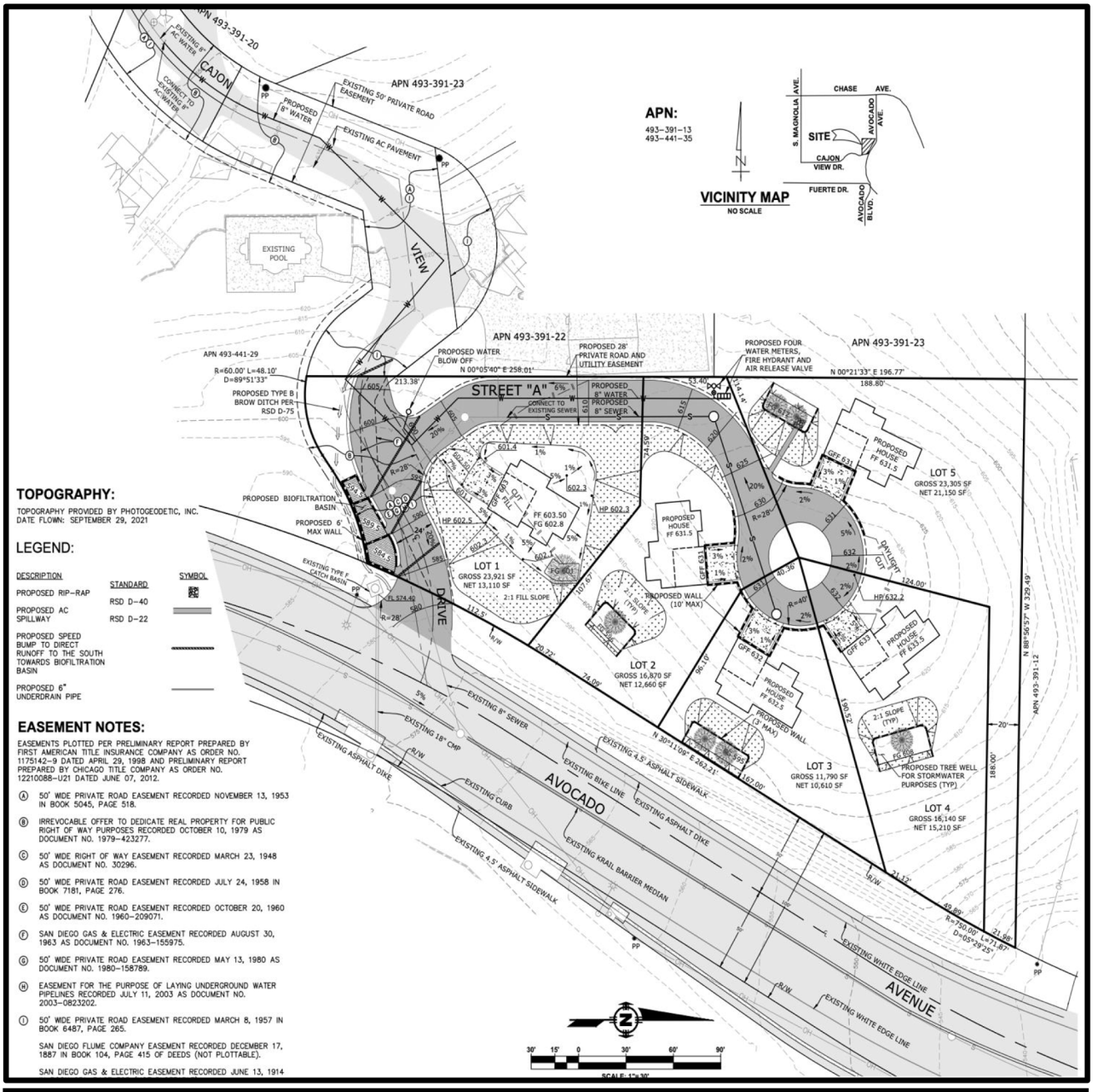


ZONING LOCATION MAP

Figure 4



SPECIFIC PLAN 23-0003	Figure 5



TOPOGRAPHY:

TOPOGRAPHY PROVIDED BY PHOTOGEODETIC, INC.
DATE FLOWN: SEPTEMBER 29, 2021

LEGEND:

DESCRIPTION	STANDARD	SYMBOL
PROPOSED RIP-RAP	RSD D-40	
PROPOSED AC SPILLWAY	RSD D-22	
PROPOSED SPEED BUMP TO DIRECT RUNOFF TO THE SOUTH TOWARDS BIOFILTRATION BASIN		
PROPOSED 6" UNDERDRAIN PIPE		

EASEMENT NOTES:

EASEMENTS PLOTTED PER PRELIMINARY REPORT PREPARED BY FIRST AMERICAN TITLE INSURANCE COMPANY AS ORDER NO. 1175142-9 DATED APRIL 29, 1998 AND PRELIMINARY REPORT PREPARED BY CHICAGO TITLE COMPANY AS ORDER NO. 12210088-U21 DATED JUNE 07, 2012.

Ⓐ 50' WIDE PRIVATE ROAD EASEMENT RECORDED NOVEMBER 13, 1953 IN BOOK 5045, PAGE 518.

Ⓑ IRREVOCABLE OFFER TO DEDICATE REAL PROPERTY FOR PUBLIC RIGHT OF WAY PURPOSES RECORDED OCTOBER 10, 1979 AS DOCUMENT NO. 1979-423277.

Ⓒ 50' WIDE RIGHT OF WAY EASEMENT RECORDED MARCH 23, 1948 AS DOCUMENT NO. 30296.

Ⓓ 50' WIDE PRIVATE ROAD EASEMENT RECORDED JULY 24, 1958 IN BOOK 7181, PAGE 276.

Ⓔ 50' WIDE PRIVATE ROAD EASEMENT RECORDED OCTOBER 20, 1960 AS DOCUMENT NO. 1960-209071.

Ⓕ SAN DIEGO GAS & ELECTRIC EASEMENT RECORDED AUGUST 30, 1963 AS DOCUMENT NO. 1963-155975.

Ⓖ 50' WIDE PRIVATE ROAD EASEMENT RECORDED MAY 13, 1980 AS DOCUMENT NO. 1980-158789.

Ⓗ EASEMENT FOR THE PURPOSE OF LAYING UNDERGROUND WATER PIPELINES RECORDED JULY 11, 2003 AS DOCUMENT NO. 2003-0823202.

Ⓘ 50' WIDE PRIVATE ROAD EASEMENT RECORDED MARCH 8, 1957 IN BOOK 6487, PAGE 265.

SAN DIEGO FLUME COMPANY EASEMENT RECORDED DECEMBER 17, 1887 IN BOOK 104, PAGE 415 OF DEEDS (NOT PLOTTABLE).

SAN DIEGO GAS & ELECTRIC EASEMENT RECORDED JUNE 13, 1914

TENTATIVE SUBDIVISION MAP | **Figure 6**

3.0 INITIAL STUDY/ENVIRONMENTAL CHECKLIST

1. **Project Title:** TSM-2022-0008 & SP 2023-0003

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 619-441-1656

4. **Project Location:** Northwest corner of the intersection of Avocado Road and Cajon View Drive
   El Cajon, CA 92020
   APN: 493-391-13 & APN:493-441-35

5. **Project Sponsor's Name and Address:** Salim Chagan
   301 Cajon View Drive
   El Cajon, CA 92020

6. **General Plan Designation:** Low Density Residential

7. **Zoning:** RS-14 (Residential, Single Family, 14,000 square foot lots) within the Hillside Overlay Zone

8. **Description of Project:**

   Regionally, the subject property is situated within the southwestern quadrant of Section 14, Township 16 South, Range 1 West, as per the San Bernardino Meridian, specifically located within the municipal boundaries of the City of El Cajon, as delineated in Figure 1, USGS El Cajon 7.5' topographic quadrangle map. Locally, the Project Site is positioned at the northwest corner of Cajon View Drive and Avocado Avenue, Figure 3. The Project Site is physically characterized as an undeveloped, rocky knoll, with moderate to steep sloping terrain. Site elevations range from 580 to 630 feet above sea level.

   The project encompasses two contiguous parcels oriented in a north-south alignment, measuring 2.27 acres and 0.18 acres, respectively. The project proposes to subdivide the larger northern parcel into five distinct residential lots, each varying in size from 10,600 square feet to 21,100 square feet. These lot sizes conform to the established zoning criteria of the City, with the net lot size averaging 14,500 square feet.

   Concurrently, the smaller southern parcel essentially serves as the right-of-way for Cajon View Drive. The proposed project includes enhancements to Cajon View Drive, including the widening of the existing roadway into a 24-foot-wide paved road. The project design also incorporates biofiltration basins and drainage culverts on the south side of the road to manage stormwater runoff from the subdivision. Collectively, these infrastructure upgrades will occupy nearly the entire 0.18-acre parcel.

Avocado Avenue currently, serves as the legal public access to the Project Site. However, as Avocado Avenue is a physically divided roadway, project access is limited to a right-in and right-out-only movement. In addition, Section 17.125.080 of the El Cajon Municipal Code states that any new lot created in the city shall have frontage on a dedicated public street that allows a minimum of 15 feet of usable access. Alternative access may be approved through the PRD, PUD or specific plan. As most of the lots within the proposed subdivision will not have direct access to a public street, SP 2023-0003 has been created, as a companion application to TSM 2022-0008, to provide access rights to the subdivision via the existing westerly extension of Cajon View Drive and Emerald Heights Road and to meet the City's street frontage requirements.

The Project has been designed in conformance with the current development standards for the RS-14 and the Hillside Overlay zone found within the El Cajon Municipal Code. The applicant is not requesting any deviations or variances from these documents.

9. Surrounding Land Uses and Setting:

North**:** Single-family homes, Zoned RS-40; Hillside Overlay
South: County of San Diego; Single-family homes, Zoned Rural Residential-1 Acre
West: Single-family homes, Zoned RS-20; Hillside Overlay
East: Avocado Avenue; Single-family homes, Zoned OS-Hillside Overlay

The Project Site is situated in the northwest corner of the intersection between Cajon View Drive and Avocado Avenue within the City of El Cajon. Cajon View Drive acts as the southern boundary of the Project and the City of El Cajon. Developed residential parcels, in the unincorporated area of San Diego County, are located immediately to the south. Existing single-family residences border the subject parcel to the north and west. Avocado Avenue borders the parcels on the east. A new 27-lot subdivision is under construction near the northwest corner of the Project Site. The residential Project Site encompasses an angular-shaped parcel, totaling 2.27 acres. The adjoining 0.18-acre parcel accommodates Cajon View Drive and is included as part of the total developed area for a total project area of 2.45 acres. The Project Site is physically characterized as having a central rocky knoll at an approximate elevation of 630 feet. The remaining portion of the property gradually slopes away to an approximate elevation of 580 feet. The topography in the vicinity of the site exhibits a moderately to steeply sloping terrain.

10. Other Public Agencies Whose Approval Is Required:

- Sewer – Approval from the City of El Cajon is required to connect the Project's sewer line to the City's sewer system located within Avocado Avenue.
- Water – Approval from the Helix Water District/Padre Dame Water District is required to connect the Project's water system to the District's water lines within Cajon View Drive.

11. Required Discretionary Approval:

The City of El Cajon is the lead agency under CEQA and is responsible for permitting the project. The following discretionary approvals would be required to implement the project as proposed:

- Approve Tentative Subdivision Map 2022-0008
- Approve Specific Plan 2023-0003
- Adopt a Mitigated Negative Declaration, Mitigation Monitoring and Reporting Program

12. Native American Contact:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the project. The results were positive. An archeological/ historical survey and report have been prepared with mitigation recommendations to address project impacts. As part of the subdivision review the City of El Cajon, as lead agency, has reached out to the Barona Band of Mission Indians and the Viejas Band of Kumeyaay Indians as directed in the NAHC letter.

Resulting from the City's circulation notification to the Native American Tribes identified by the NAHC, the Barona Band of Mission Indians requests to be consulted during grading monitoring and data recovery program development. The Barona Band further requests, as proposed by MM-CUL-1 and MM-CUL-2, that a qualified archaeologist and native American monitor be present during earth disturbing activities. Further, the Barona Band requests to be notified of inadvertent discoveries during earth-disturbing activities.

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.

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

Determination (to be completed by the Lead Agency):

On the basis of this initial evaluation:

☐ 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 as revisions in the project have been made by or agreed to by the project proponent and/or mitigation has been agreed to. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

City of El Cajon _____ Date _____

Environmental Initial Study and Checklist - 3.0

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The City of El Cajon is located in a valley that is surrounded by the Cuyamaca foothills, with views of rolling hillsides and mountains. Mission Trails Regional Park is located to the northwest of the city and Mt. Helix to the south. The Cuyamaca Mountain Range, Mt. Helix, and Mission Trails Park are visible from many vantage points throughout the city. The views of the surrounding mountains and hillsides are considered important visual resources.

The Project Site is situated in the southern part of the City, positioned midpoint along a prominent north-facing slope. Approximately one mile to the south of the Project Site, the terrain plateaus to an elevation of 800 feet above sea level. From this point, the topography gradually descends to the north, ultimately reaching the valley floor, at approximately 450 feet in elevation. Avocado Avenue traces a path along the bottom of a ravine, connecting these two distinct areas. Bordering Avocado Avenue are areas with moderate to steep slopes that ascend on both sides of the roadway. The views from the Project Site encompass the residential hillside vistas to the east of Avocado Avenue and extend north towards the valley floor and the mountains beyond.

a. **Less Than Significant Impact.** The Project Site is located within a city-designated Hillside Overlay Zone. Section 17.170.010 of the El Cajon Municipal Code contains development policies and development standards designed to encourage the safe, orderly, and controlled development of the hillside areas. These standards include limiting cut and fill slopes to a 2:1 gradient, limiting slope heights to less than 30 feet, minimizing the quantity of grading, and the rounding of tops and vertical corners to create more natural-appearing terrain.

   The site is characterized as a central rocky knoll with moderate slopes to the north, south, and west. Per the Hillside Zone criteria, approximately one-half of the parcel will not be graded with many rock outcroppings to remain. Grading is proposed for the extension of Cajon View Drive, the new interior road, and for utilities to and through the site. Grading on the individual lots will primarily be limited to the driveway and minimal surface grading in and around the building pad. Most of the future homes will be built elevated off the ground utilizing support structures, except for Lot 1. As this lot is located off the top of the knoll, cut and fill slopes will be required to create a building pad within the slope. Separate biofiltration basins will also be constructed within the slope of each lot. Views from the homes to the east, along Avenida Abajo, will change. Currently, their view is of the undeveloped knoll, but the knoll already blocks their northwest view of the valley. Single-family homes will be constructed on the knoll,

changing the type view. However, this is consistent with the views of, and from, the surrounding hillsides as these slopes and hilltops are already similarly developed with single-family homes.

The proposed residential subdivision is compatible with the existing visual environment in terms of visual character and quality because single-family residences currently surround the subject, infill, site. The proposed residential uses would be consistent with the surrounding uses and views. With the implementation of the hillside development criteria and the limited amount of proposed grading the project will have a less than significant impact on scenic vistas.

b. **Less Than Significant Impact.** The Project Site is characterized as a rocky knoll with moderate to steep slopes that transition down to Cajon View Drive and Avocado Avenue. Large and small-sized granite boulders are scattered throughout the parcel, many are partially buried. Several of the outcroppings may be of cultural significance and will remain undisturbed. As it is expensive to grade, fracture, and/or remove so many boulders, site grading has been designed to minimize the impact on the rock outcroppings as much as possible. Existing vegetation consists of a mix of disturbed habitat, Diegan coastal sage scrub, and Buckwheat scrub. There are no trees within the proposed site grading. Any impacted habitat considered of biological value will be mitigated off-site with comparable habitat.

   A scenic highway is officially designated as a state scenic highway when the local jurisdiction adopts a scenic corridor protection program and receives approval from the California Department of Transportation (Caltrans). Avocado Avenue borders the east side of the Project Site. The City's General Plan does not identify this roadway as scenic. There are no designated scenic highways or historic structures in the vicinity of the site. The nearest scenic highway is State Route 125, located approximately three miles west of the project and is not visible from the Project Site. As there are no significant scenic resources, in conjunction with modest site grading and mitigation of any habitat resource, the proposed project will have a less than significant impact on the visual character of the site.

c. **Less Than Significant Impact.** The Project is located within an urbanized area. Equally, the Hillside Overlay Zone applies to the entire project site and surrounding area. Surface boulders, rock outcroppings, and subsurface rock require the project to take advantage of the site's topography by minimizing grading and general disturbance of the natural terrain. Four of the five proposed lots will be spread across the surface of the knoll with sections of each home elevated off the ground surface as the slopes fall away. Lot 1, located mid-slope on the knoll will require more extensive grading resulting in an approximate 20-fill slope facing Avocado Avenue and a 25-foot interior cut slope. The fill slope will be at a 2:1 slope and will be graded to match the adjacent terrain. The future home on Lot 1 will almost entirely block the street view of its cut slope. In addition to the grading for the pad of Lot 1, small bioretention basins will be graded into each of the other four parcels. Three of the four bioretention basins will be visible from Avocado Avenue. However, both cut and fill slopes for Lot 1 and the bioretention basins will be landscaped per the City's hillside slope planting requirement. The landscaping will be drought tolerant and of a density to cover and conceal surface disturbance resulting from construction grading.

   Once the subdivision is completed, the site will have a visual character that will be similar to its surrounding residential land uses. Since the residential subdivision would not dominate the viewshed or significantly change the residential pattern of the surrounding environment, the proposed project would be compatible with the existing environment's visual character and quality. Therefore, the proposed project would not significantly degrade the existing visual character or quality of the site. As the project is designed in compliance with the City's Hillside development regulations, the project would not conflict with the zoning governing the scenic quality of the area. Potential visual impacts would therefore be considered less than significant.

d. **Less Than Significant Impact**. The City of El Cajon Municipal states that lighting for single-family developments should be adequate for pedestrian and vehicular safety and sufficient to minimize security problems. However, in no case shall the required lighting create a nuisance on any adjacent property. As an infill project, the project site is already surrounded by residential development that contains their own sources of light and glare. Streetlights, located along Avocado Avenue, also provide a source of night light in the project area.

With the development of the project, the level of lighting within and surrounding the project site would incrementally increase over the existing condition. All new lighting would be in conformance with City standards and residential lighting would be comparable to that of the surrounding homes. As such, the project would not have an adverse effect on day or nighttime views in the area. Thus, project lighting would not introduce a substantial amount of lighting into an unlighted area and the project's contribution to light pollution, skyglow, light trespass, or glare would be less than significant.

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 compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

The California Department of Conservation's Farmland Mapping and Monitoring Program identifies and designates areas with prime soils and soils of local or statewide importance based on their suitability for agricultural use. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments as opposed to full market value.

a. **No Impact.** The Project Site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the California Resources Agency's Farmland Mapping and Monitoring Program maps. As such, there is no potential for the development of the Project Site to impact or convert Farmland resources to a non-agricultural use. No impact is anticipated and no mitigation measures are required.

b. **No Impact.** The Williamson Act is a California law that provides relief of property tax to owners of farmland and open-space land in exchange for a ten-year agreement that the land will not be developed or otherwise converted to another use. The Project Site is not zoned for agricultural use, nor is there a Williamson Act contract on the site. Therefore, there is no potential for the development of the Project Site to conflict with existing zoning for agricultural use or a Williamson Act contract. No impact is anticipated and no mitigation measures are required.

c. **No Impact.** Neither the Project Site nor surrounding lands have been zoned as forest land or timberland production. As such, the development of the Project Site will not conflict with existing zoning for forest land or timberland. No impact is anticipated and no mitigation measures are required.

d. **No Impact.** The Project Site has not been zoned as forest land or timberland nor does any of these resources exist on the parcels. Therefore, the development of the Project Site will not result in a loss of forest land or the conversion of forest land to other uses. No impact is anticipated and no mitigation measures are required.

e. **No Impact.** No farmland land, forestland, or timberland exists on the Project Site or the immediate vicinity. Development of the proposed project would not involve any changes to the existing environment that, because of their location or nature, could result in the conversion of Farmland to nonagricultural use or forestland to non-forest use. No impact is anticipated and no mitigation measures are required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality. Where available, the significance criteria established by the applicable air quality management 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 in any criteria pollutant for which the project region is a nonattainment area for 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?	☐	☐	☒	☐

The Federal Air Quality Standards were developed per the requirements of The Federal Clean Air Act (CCA), passed in 1970 and amended in 1990. This law provides the basis for the national air pollution control effort. An important element of the act included the development of national ambient air quality standards (NAAQS) for major air pollutants.

The CAA established two types of air quality standards otherwise known as primary and secondary standards. Primary Standards set limits for the intention of protecting public health, which includes sensitive populations such as asthmatics, children, and elderly. Secondary Standards set limits to protect public welfare to include the protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for principal pollutants, which are called "criteria" pollutants. The California Ambient Air Quality Standards (CAAQS) is similar to the NAAQS and also restricts additional contaminants.

The CAAQA, signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporates additional standards for most criteria pollutants and sets standards for other pollutants that have been recognized by the state. In general, the California standards are more health-protective than the corresponding NAAQS. The San Diego Air Pollution Control District (SDAPCD) has local air quality jurisdiction over projects in San Diego County. Responsibilities of the air district include overseeing stationary-source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, overseeing agricultural burning permits, and reviewing air quality–related sections of the environmental documents required by CEQA. The SDAPCD is also responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws and for ensuring that the NAAQS and CAAQS are met.

At a local level, the City of El Cajon has multiple policies in its adopted Sustainability Initiative to reduce air pollution. These strategies include increasing the use of electric vehicles; improving traffic circulation; and encouraging more trips by foot, bike, and public transportation. The City has also adopted the Mixed-Use Overlay Zone and Transit District Specific Plan, which focuses new housing in areas served by public transit. The Transit District Specific Plan also contains policies and future projects to “green” streets by planting street trees, installing landscaping, and improving areas for biking and walking.

a. **Less Than Significant Impact.** As noted above, air pollution is regulated through various federal, state, and regional regulations. Emission standards are established for a variety of greenhouse gases including ROG, NOX, CO, SO2, PM10, and PM2.5. Consistency with the RAQS assumptions is determined by analyzing the project with the assumptions in the RAQS. Thus, the emphasis of this criterion is to ensure that the analyses for the project are based on similar forecasts as the RAQS. As shown in Tables 1 and 2, neither the operation nor construction of the project would result in the creation of significant levels of emissions or that exceed the applicable thresholds. As such, the proposed project is not projected to conflict with the state, regional, and local air quality plans. Therefore, impacts on local air quality are considered to be less than significant.

Table 1 – Operations Emissions - Expected Summer Daily Pollutant Generation (lb/day)

	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile	0.18	0.12	1.21	< 0.005	0.25	0.06
Area	7.9	0.15	9.73	0.02	1.3	1.3
Energy	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005
Total (Unmitigated)	**8.09**	**0.31**	**11**	**0.02**	**1.55**	**1.36**
Screening Level Threshold (lb/day)	75	250	550	250	100	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Daily pollutant generation assumes trip distances within CalEEMod. The final numbers are all rounded within Excel and are reported as rounded numbers.						

Table 2 – Construction Emissions - Expected Maximum Daily Emissions– Pounds per Day (lb/day)

Year	VOC	NO_x	CO	SO_2	PM_{10} (Total)	$PM_{2.5}$ (Total)
2025	5.48	4.68	42.5	0.07	21.6	10.5
Screening Level Threshold (lb/day)	75	250	550	250	100	55
% lower than Standard	-92.69%	-98.13%	-92.27%	-99.97%	-78.40%	-80.91%
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

The San Diego Air Pollution Control District (SDAPCD) is the government agency that regulates sources of air pollution within the county. Therefore, the SDAPCD developed a Regional Air Quality Strategy (RAQS) to provide control measures to try to achieve attainment status for state ozone standards with control measures focused on VOCs and NO_X. Currently, San Diego is in "non-attainment" status for federal and state O_3 and state PM_{10} and $PM_{2.5}$. An attainment plan is available for O_3. The RAQS was adopted in 1992 and has been updated in 2022.

Project implementation would produce temporary pollutant emissions during construction and long-term operational emissions. Project construction activities would generate emissions from the operation of on-site heavy duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of heavy-duty construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Total daily construction emissions are a function of the level of equipment activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials being transported on or off-site. Fugitive dust emissions generally represent 30 percent of all particulate matter and are generally associated with land clearing and grading operations. Standard City requirements include implementation of dust control measures and the construction activities would be subject to SDAPCD standards, including dust control measures. Based on the small size of the project, construction emissions would be minor and temporary in nature, and impacts would be less than significant.

Operational air pollutant emissions would include those associated with stationary sources, energy sources, and mobile sources. Stationary sources associated with the project would come from landscape equipment, general energy use, and solid waste. Energy emissions would come from electricity and natural gas use. Mobile source emissions would be generated due to personal vehicles use from residents (estimated to be 50 average daily trips (ADT)). As shown in Table 1, Operation Emissions of all pollutants would be less than the significance thresholds. Based on the small project size, project-related long-term operational emissions are expected to be minor and would result in less-than-significant impacts and the regional emissions impact would be less than significant, as well.

Table 3 - San Diego County Air Basin Attainment Status by Pollutant

Criteria Pollutant	Federal Designation	State Designation
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Attainment *	Nonattainment
Carbon Monoxide	Attainment	Attainment
PM10	Unclassifiable **	Nonattainment
PM2.5	Attainment	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

** The federal 1-hour standard of 12 pphm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.*
*** At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.*
(SDAPCD, 2019)

b. **Less than Significant Impact.** Sensitive receptors are classified as facilities and structures where people live or spend considerable amounts of time, including retirement homes, residences, schools, churches, and childcare/senior centers. The proposed project is near existing residences and school facilities. The nearest off-site residence is approximately 20 feet from the project site, the Community of Christ Church is approximately 650 feet to the west, and the nearest school (Chase Avenue Elementary School) is approximately 900 feet from the project site. Key pollutants of concern generated during construction are dust, diesel exhaust, and Carbon Monoxide. As the construction of single-family homes is not immediately anticipated in this first phase, grading and development of the project site is anticipated to take less than six months.

   The grading operations associated with the construction of the project are subject to the City of El Cajon Grading Ordinance, which requires the implementation of dust control measures. Additionally, based on the emissions summaries in Tables 1 and 2, emissions from construction and operation would be below the threshold of significance. Therefore, the construction and operation emissions associated with the proposed project would not result in a cumulatively considerable net increase in any key pollutant identified under an applicable federal, state, or regional ambient air quality standard. Therefore, cumulative air quality impacts would be less than significant. To ensure compliance the Air Quality Report implementation of a Project Design Feature (PDF) in suggested. This PDF states:

   - PDF-1 Project-related construction equipment shall use Tier 4 construction equipment as defined by United States Environmental Protection Agency (EPA) / California Air Resources Board (CARB) standards. The grading contractor shall submit a letter to the City of El Cajon committing to this requirement.

c. **Less Than Significant Impact**. The ability of project related emissions to adversely affect a substantial number of people depends on area conditions such as duration and type of construction activity, wind direction, and proximity of sensitive receptors. During construction activities, emissions from construction equipment may be evident in the immediate area on a temporary basis. Potential odors could include traces of diesel or fresh asphalt. If present, these odors would be short-term and not likely to rise to a level of a nuisance level that would violate SDAPCD standards. With the completion of construction, the proposed project would not have any significant odor sources, and any odors generated would be similar to odors from typical residential land uses. Given the size, scale, and location of the proposed development, the project would not generate significant operational odors that would affect a substantial number of people. Therefore, the project's projected concentrations of pollutants relative to large population areas would result in a less than significant impact.

d. **Less Than Significant Impact.** The occurrence and severity of odor impacts depend upon a number of factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptor. Although offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Odors would be temporarily generated from equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary, localized and generally occur at magnitudes that would not affect a substantial number of people. No sources of odor would be associated with long term residential use of the site. Therefore, the proposed project would result in a less than significant odor impact.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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, 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 nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

The City of El Cajon enrolled in the Natural Community Conservation Planning/Coastal Sage Scrub Program (NCCP/CSS) in June of 1993. This voluntary program obligated the City to follow certain habitat conservation planning guidelines directed towards the preservation of large-blocks of Coastal Sage Scrub vegetation and associated Special Status Species. The City further began to prepare a Subarea Plan under the guidelines of the Multiple Species Conservation Program, an offshoot of the NCCP/CSS Program. This Subarea Plan was never finished or certified, and the City currently relies on the Wildlife Agencies (California Department of Fish and Wildlife and U.S. Fish and Wildlife Service) for guidance with respect to impacts to native habitats and species. “Take” authorization for impacts to listed species must be secured from the unincorporated County of San Diego through its I-122 Policy.

An incomplete biological study of the TSM-2022-0008 project site was initiated by Cadre Environmental in January of 2023. The Cadre document provided some background for this report that included a new baseline biology survey of entire project site and a complete species inventory.

In December 2023 Vince Scheidt, Biological Consultant performed a new habitat assessment in conjunction with vegetation mapping in the survey area. Prior to conducting this field work he reviewed the background information provided in a previous draft biological report prepared for the project site. The purpose of this more-current survey has been to identify the site’s flora and fauna, the onsite habitat-types, potential project impacts, and mitigation, if required.

The proposed project consists of a 5-lot subdivision map allowing the construction of a residential development project with associated infrastructure. Approval and implementation of the project would result in a large part of the site being impacted by the proposed development. This includes grading, the construction of residential home sites, parking areas, fencing, drainage and water quality improvements, landscaping, fire clearing and related activities. Habitats presently found onsite include Diegan Coastal Sage Scrub (DCSS), Disturbed Buckwheat Scrub (DBS), Ruderal Vegetation (RV), and Disturbed/ Developed Habitat (DDH).

a. **Less than Significant with Mitigation Incorporated**. The proposed project could impact up to 0.42 acre of DCSS and 1.02 acres of DBS. Although regulated and considered sensitive, these habitat-types remain relatively well-distributed in San Diego County. Furthermore, the habitats present on the project site are at least partially disturbed and isolated in nature. Therefore, this project's relatively minor impacts to DCSS and DBS (from a regional perspective) are not considered "cumulatively considerable" when viewed in the context of the substantial acreages of these habitat-types persisting in San Diego County. Furthermore, all impacts to these habitat types will be fully mitigated for, reducing them to below a level of significance.

   Fifty-seven species of vascular plants and twenty species of animals were detected during the field surveys of the property. This list represents a characteristic flora and fauna associated with this part of the City of El Cajon. Most of the species detected are common to this area, although one is considered a special status, or "sensitive" species.

   San Diego County Viguiera was the only sensitive species observed on the project site. San Diego County Viguiera is relatively well distributed in San Diego County, and only a handful of specimens appear to occur on the subject project site. Therefore, the minor impacts to this species associated with the proposed project are not cumulatively considerable. Furthermore, impacts to this species will be fully mitigated for via the adoption of "habitat-based" mitigation, as promoted by the NCCP, reducing them to a level below significance. A number of additional sensitive species are known to occur in the general vicinity of this property and some of these could utilize the site, such as various species of rare bats, various species of raptors, rare reptiles, etc. However, it is unlikely that any locally or regionally-significant populations of special status species would be found onsite. In any case, all potential cumulative project impacts to sensitive species would be mitigated to a level that is below significance through the preservation of equivalent or better-quality habitat presumably supporting the same special status species that could occur onsite. See mitigation measures MM-BIO-1and 2.

b. **No Impact.** As noted in the biological assessment, the project site does not contain any wetland areas or other jurisdictional resources including but not limited to, marsh, vernal pool, stream, lake, river, or waters of the U.S. regulated by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) that could potentially be impacted by the proposed project. Therefore, no impact is anticipated and no mitigation measures are required.

c. **No Impact.** The project site does not contain any wetland areas as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river, or water of the U.S. that could potentially be impacted through direct removal, filling, or hydrological interruption, diversion, or obstruction by the proposed development. The US Fish and Wildlife Service maintains an online map of various types of wetlands (Wetland Mapper), which indicated no wetland or related features onsite or in the surrounding areas. Therefore, no impacts would occur to riparian or any other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service. No impact is anticipated and no mitigation measures are required.

d. **No Impact.** The Project Site and adjacent offsite impact areas are bordered to the north, south and west by suburban density residential development and east by a high-traffic road (Avocado Avenue). Because of the property's small size, and mostly disturbed nature, it lacks unique features or resources that would enhance its biological significance. For these reasons, wildlife corridors or linkages are not present onsite and there is little potential for large mammals to use the property, other than urban-tolerant species such as skunks, opossums, coyotes, etc. The Project Site does not represent a wildlife movement route, corridor, or linkage area. Therefore, no impact is anticipated and no mitigation measures are required.

e. **No Impact.** The proposed project would not conflict with any of El Cajon's local policies or ordinances that protect biological resources. At this time the only policy relating to biological resources is the designation of open space areas on the General Plan Map. The project site is not within a designated

open space area. No heritage trees were documented onsite. Therefore, no impact is anticipated and no mitigation measures are required.

f. **Less than Significant with Mitigation Incorporated.** The Project Site is located within the Draft El Cajon MSCP Subarea Plan boundary, which has not been adopted, and is located outside of the Final County of San Diego Biological Resources Core Area. The Project Site is not located within a hardline or pre-approved mitigation area.

Approval and the subsequent implementation of TSM-2022-0008 could result in the following direct and indirect impacts as defined by CEQA. Although not all of the vegetation on this site will be directly removed by grading, indirect impacts resulting from edge effects, fire clearing, etc. are anticipated to result in 100 percent of the site being impacted, directly or indirectly, as follows:

1. A loss of up to 0.42 acres of Disturbed Diegan Coastal Sage Scrub (DCSS) as a result of grading and clearing for fire protection. Impacts to DCSS are considered significant and require mitigation.
2. A loss of up to 1.02 acres of Disturbed Buckwheat Scrub (DBS) as a result of site grading. Impacts to DBS are considered significant and require mitigation.
3. A loss of up to 0.53 acres of Ruderal Vegetation (RV) as a result of site grading. Impacts to RV are considered less than significant and do not require mitigation.
4. A loss of up to 0.14 acre of Disturbed/Developed Habitat (DDH) as a result of site grading. Impacts to DDH are considered less than significant and do not require mitigation.
5. Potential displacement impacts to nesting raptors or migratory songbirds are considered significant. The federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code (CFGC) protect the nests of essentially all native birds. Avian nesting in some of the trees or larger shrubs on or adjacent to the site is possible. Any disturbance, either direct or indirect, that would cause abandonment of active nests containing eggs or young would be a violation of the MBTA and/or the CFGC, and thus inconsistent with the requirements of CEQA.

Because all project impacts will be mitigated to a level that is below significance, the proposed project will not have cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resources.

Mitigation Measures

In order to reduce project impacts to “less than significant”, the following mitigation measures are recommended:

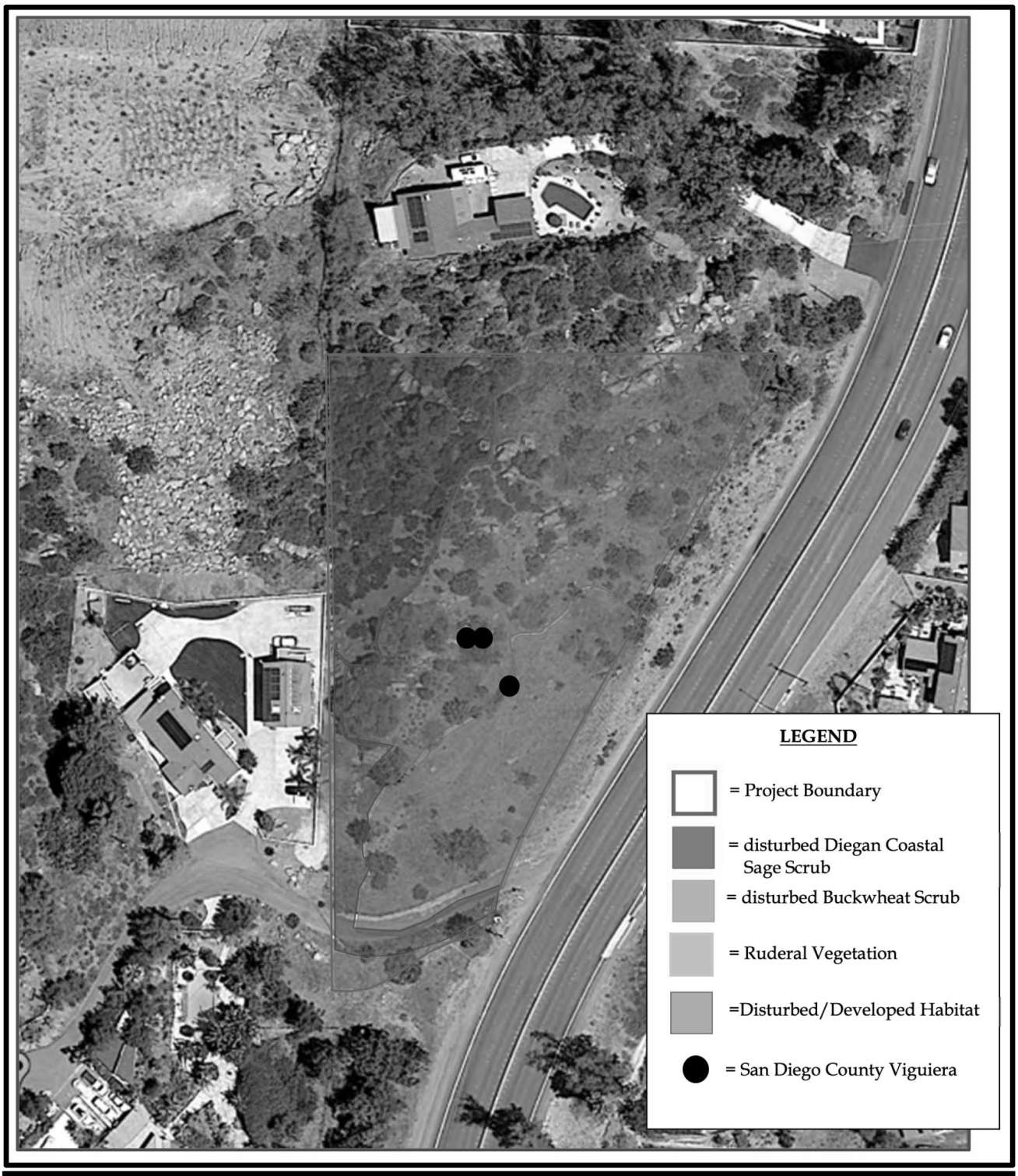
MM-BIO-1. Impacts to CSS generally require mitigation at a ratio between 1:1 and 3:1, based primarily on the quality of the vegetation/habitat. That is, for every acre-unit of CSS being impacted, between one and three acre-units of equal or higher value CSS (or other higher-value habitat) must be conserved. This can take place either onsite or offsite in an approved location. The subject project will impact slightly less than one-half acre (0.42 acre) of DCSS. Based on the quality of the DCSS and patch size of the vegetation, it is recommended that a 2:1 mitigation ratio be applied. Therefore, at least 0.84 acre of CSS mitigation should apply. Furthermore, “take” authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 0.84 acre of CSS or higher-value Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

MM-BIO-2. Impacts to DBS are generally evaluated as being equivalent to impacts to CSS. That is, they require a similar mitigation approach. The subject project will impact approximately 1.02 acre of DBS. Due to the very heavily disturbed nature of the DBS on the subject site, it is recommended that the impacts to this habitat be mitigated at a 1:1 ratio. In other words, for every acre-unit of DBS impacted, one acre-unit of equal or higher value scrub habitat (or other higher-value habitat) must be conserved.

Therefore, at least 1.02 acre of DBS mitigation should apply. Furthermore, “take” authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 1.02 DBS (or CSS or higher- value) Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

MM-BIO-3. Site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird or raptor nesting location (including ground-nesting location) should not take place during the spring/summer songbird breeding season, defined as from 1 January (for nesting raptors) to 31 August of each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prevents the “take” of eggs, nests, feathers, or other parts of most native bird species, and the Endangered Species Act. Limiting development activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 500 feet of the proposed activity will be required. The results of the survey will be provided in a report to the City’s Planning Division for concurrence with the conclusions and recommendations.

Impacts to RV and DDH do not require mitigation. Impacts to these habitat-types are less than significant. No other biological mitigation associated with the proposed project is recommended at this time.



7	**BIOLOGICAL RESOURCES MAP**	**Figure**

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The proposed project is located on a rocky knoll in an area previously known to be of archeological significance. In compliance with the City of El Cajon's environmental review process BFSA Environmental Services conducted an archaeological investigation, dated May 17, 2023 of the 2.45-acre project site. The purpose of the study was to locate and record any cultural resources present within the project area and subsequently evaluate any resources in compliance with CEQA and City of El Cajon guidelines. The investigation also included a review of an archaeological records search, performed at the South Coastal Information Center (SCIC) at San Diego State University (SDSU), in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the project boundaries or in the immediate vicinity.

a. **Less Than Significant with Mitigation Incorporated**. The SCIC review did not show any resources recorded within the project site. However, the subject property is surrounded by various recorded elements of a prehistoric site associated with a natural spring which fed into a stream originally located along the alignment of Avocado Avenue. In prehistoric times, this spring would have provided a year-round source of fresh water for inhabitants or visitors to the area. The springs were also utilized historically and later known as the El Granito Springs. The spring water was bottled and sold between the years 1895 and 1915. The SCIC review reported that 44 resources and 42 historic addresses are recorded within the one-mile search radius. BFSA also requested a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) which was returned with positive for the presence of sacred sites or locations of religious or ceremonial importance within the project vicinity.

   The data from Site SDI-10,237 Locus F confirms that this was a location where Late Prehistoric Kumeyaay camped and conducted food collecting and processing. Based upon the depth of the deposit, which could potentially be the result of hundreds of years of rodent burrowing, the location of Site SDI-10,237 Locus F was visited multiple times during the Late Prehistoric Period (generally 500 to 1,500 YBP) as part of the hunting and collecting subsistence pattern. The artifacts represented in the collection from the testing program document the subsistence focus of the site occupants, and the depositional pattern of artifacts within a deposit averaging 40 centimeters in depth points to the periodic, but not permanent, use of the site over a long period of time. In summary, the presence of a cultural deposit and various artifact types in a stratigraphic pattern demonstrates the use of the site location over a long period of time, represents a location that retains research potential, and is significant to the understanding of the Late Prehistoric habitation of this location.

   Based upon the results of the field survey, testing program, records search, and site significance evaluations Site SDI-10,237 Locus F was identified as a CEQA-significant Historical Resource. The development footprint for the proposed subdivision will impact almost the entirety of the intact archaeological deposits and any impacts to the site associated with the development of the property would be considered significant and will require mitigation as a condition of project approval in accordance with CEQA and the City of El Cajon environmental guidelines. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the potentially significant impacts to cultural and historical resources to a less than significant level.

b. **Less Than Significant with Mitigation Incorporated**. A cultural resources survey was conducted on January 27, 2023. During the survey, 31 prehistoric bedrock milling features (BMFs) were identified. In addition, surface artifacts consisting of lithic flakes, ceramics (pottery), and groundstone, were encountered throughout the project. A distinct area of darker cultural soil with associated surface artifacts was located within the northeastern quarter and southern portion of the subject property. Based upon the location of the site, it was determined that the resources within the proposed subdivision are a continuation of Site SDI-10,237 Locus F, which was separated from the other area of the locus by the construction of Avocado Avenue.

   Based upon the results of the field survey and records search, Site SDI-10,237 Locus F the proposed subdivision was tested and evaluated for significance under CEQA. Testing of the site was conducted on April 4 and 5, 2023. In addition to a surface collection of artifacts and the detailed recordation of all 31 milling features, collectively containing 59 milling elements, the testing program included the excavation of 16 shovel test pits and one one-square-meter test unit. The testing program recovered a large number of pieces of debitage, flake tools, cores, manos, metates and pieces of pottery.

   As a result of the testing program and site significance evaluations, SDI-10,237 Locus F within the project site was identified as a Section 15064.5 CEQA-significant Historical Resource. The development footprint for the proposed subdivision will impact the entirety of the intact archaeological deposits and any impacts to the site associated with the development of the property would be considered significant and will require mitigation as a condition of project approval in accordance with CEQA and the City of El Cajon environmental guidelines. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the potentially significant impacts to cultural and historical resources to a less than significant level.

c. Less Than Significant with Mitigation Incorporated. The project site is not a formal cemetery or near a formal cemetery. The area surrounding the site is residentially developed. However, human remains have been found in association with other archeological resource recovery programs connected with the evaluation of SDI-10,237, located north of the project site. No human remain were discovered with the BFSA testing of the project site in 2023. However, the potential exists to uncover humans remains during the additional testing proposed in the mitigation measures and/or during the grading process. Mitigation Measure CUL-1 requires that if human remains are discovered, work shall halt in that area, and the procedures detailed in the California Health and Safety Code (Section 7050.5) and the California Public Resources Code (Section 5097.98), if applicable, shall be followed. It includes contacting the San Diego County Medical Examiner's Office and NAHC if the remains are determined to be of Native American origin. Implementation of the proposed mitigation measures would reduce the potentially significant impacts to human remains to a less than significant level. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding human resources.

Recommended Mitigation Measures

Archaeological Data Recovery Program

The purpose of an Archaeological Data Recovery Program (ADRP) is to recover sufficient important archaeological information from a site to exhaust the resource's research potential, and thereby mitigate project-related adverse impacts. This approach to the mitigation of cultural resources involves additional archaeological excavations, analysis, and reporting for the portion of the site that will be impacted using a lead agency-approved data recovery plan that is informed by the results of the site testing excavation data. An ADRP can achieve mitigation by exhausting the site's research potential through excavation of a statistically valid sample of the cultural deposit. The following mitigation measures are recommended as a condition of project approval.

MM-CUL-1. Data Recovery Mitigation Program

Prior to granting a grading permit, the applicant shall retain a qualified archaeologist to complete the data recovery program. The archaeologist shall complete the following:

1. **Research Design:**
   The project archaeologist shall prepare and submit a detailed research design to the City to properly guide the data recovery process. This research design will present the appropriate research topics that can be advanced information from this site. The research design will also provide the sampling strategy to accomplish the recovery of sufficient data to achieve the advancement of research questions and exhaust the research potential of the site. The research design shall consider the Native American perspective and issues related to the presence of human remains and ceremonial objects. The sampling strategy envisioned for this project will include a phased approach consisting of an initial unbiased index of the site using a 1.50 percent sample. Phase 2 of the data recovery excavation would focus subsequent excavations at locations where data potential is highest, based upon Phase 1 results, and excavated in a grid pattern. If required a Phase 3, excavated in blocks of units, may be necessary based on the findings of the two previous phases. The research design will present all field and laboratory procedures and protocols, notably the process to be followed when human remains are discovered. Curation of artifacts and repatriation of human remains should also be discussed in the research design as human remains have been identified at multiple Site SDI-10,237 loci.

2. **Data Recovery Program:**
   Upon city review and acceptance of the research design, the field excavation should proceed. All field excavations should include a Kumeyaay Native American representative. The sample size to be excavated in the Phase 1 indexing of Site SDI-10,237 Locus F shall consist of a 1.50 percent sample of the subsurface deposit, or approximately 19 one-square-meter data recovery units split between the two concentrations of intact archaeological deposits. All sample units will measure one-square meter and will be excavated according to standard archaeological protocols. All soil from the units will be screened through one-eighth-inch mesh screens. Water screening of dense deposits or areas of human remains will be conducted as appropriate. Analysis of the Phase 1 excavation results will narrow the focus of the Phase 2 excavations to those areas, if any, where research potential is considered high. The size of the Phase 2 sample, or any subsequent phases, is dependent upon the size of the area delineated as retaining significant research potential and, therefore, it will be at the discretion of the project archaeologist to determine the size and scope of the Phase 2 or Phase 3 sample. Should additional phases be necessary the ultimate goal is a cumulative 2.00 to 5.00 sample of significant archaeological deposits. Upon conclusion of the field excavations, the project archaeologist shall provide a letter to the City to release the grading permit. The final report for the data recovery program will be completed following the grading of the property and shall be submitted as a condition of the release of occupancy permits for the new residences. All artifacts collected from the site will be processed and cataloged in accordance with standard archaeological protocols. Special studies, including radiocarbon dating, obsidian sourcing and hydration analysis, seasonality study, focused study, and ceramic analysis, shall be included in the laboratory process. All artifacts shall be prepared for permanent curation at the SDAC.

3. **Controlled Grading of Site SDI-10,237 Locus F**
   Following completion of the archaeological excavations, the project archaeologist shall direct the controlled grading of the cultural deposit at the initiation of the grading of the property. The controlled grading will require the use of shallow cuts made into the cultural deposit to reveal any dense cultural deposits, features, or human burials. Additional archaeological excavation units may be needed to expand the data recovery sample and mitigate impacts to significant features encountered. All cultural soil from this property shall remain on-site and be incorporated into the graded pads. This requirement is appropriate to retain any fragments of human remains that could not be recovered within the same general provenience as left by their ancestors. Upon completion of the controlled grading of Site SDI-10,237 Locus F, the remainder of the grading of the project will be monitored following the procedures outlined in MM-CUL-2

MM-CUL-2. Mitigation Monitoring and Reporting Program

In addition to the required mitigation of impacts to SDI-10,237 Locus F, as a condition of project approval and prior to the initiation of grading, the project applicant shall retain Native American (Kumeyaay) and archaeological monitors to be present during grading for all on- and off-site ground disturbance. Typical monitoring requirements include the following:

- Implement a grading monitoring and data recovery program to mitigate potential impacts to undiscovered buried archaeological resources on the proposed project to the satisfaction of the City of El Cajon. This program shall include, but shall not be limited to, the following actions:

  A. Provide evidence to the City of El Cajon that a qualified archaeologist has been contracted to implement a grading monitoring and data recovery program to the satisfaction of the lead agency. A letter from the principal investigator (PI) shall be submitted to the lead agency and shall include the following guidelines:

     (1) The project archaeologist shall contract with a Native American (Kumeyaay) monitor to be involved with the grading monitoring program.
     (2) The qualified archaeologist and Native American (Kumeyaay) monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
     (3) The project archaeologist shall monitor all areas identified for development, including off-site improvements. Any inadvertent discoveries of artifacts or exposure of cultural soil shall be considered potential impacts and subsequently mitigated following consultation with the City of El Cajon and the Native American monitors.
     (4) An adequate number of archaeological and Native American (Kumeyaay) monitors shall be present to ensure that all on- and off-site earthmoving activities are observed and shall be on-site during all grading activities for areas to be monitored.
     (5) An attempt shall be made to relocate any impacted BMFs to an open-space or unimpacted area of the project.
     (6) A qualified archaeologist and a Kumeyaay Native American representative shall monitor the grading and excavation of all soil until geological formational soil horizons are encountered. The reduction in archaeological and Native American monitoring must be reviewed and approved by the City of El Cajon. The Native American representative must concur with the reduction of monitoring. Inspections will vary based upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the project archaeologist in consultation with the Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the PI.
     (7) Isolates and clearly nonsignificant deposits shall be minimally documented in the field and the monitored grading can proceed.
     (8) In the event that previously unidentified, potentially significant cultural resources are discovered, the archaeological monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The PI shall contact the lead agency at the time of discovery. The PI, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the PI and approved by the lead agency, then carried out using professional archaeological methods.
     (9) If any human remains are discovered, the PI shall contact the San Diego County Medical Examiner's Office. In the event that the remains are determined to be of Native American origin, the MLD, as identified by the NAHC, shall be contacted by the PI in order to determine proper treatment and disposition of the remains.
     (10) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The PI shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

(11) All cultural material collected during the monitoring program, as well as all artifacts recovered during the site evaluation phase of work, shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, thereby being professionally curated and made available to other archaeologists/researchers for further study. Alternatively, prehistoric materials collected during the site evaluation and monitoring programs may be curated at a tribal curation facility that meets federal standards per 36 CFR Part 79 or be repatriated to a culturally affiliated tribe. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

(12) Monthly status reports shall be submitted to the lead agency starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during this period and the status of progress on the overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

(13) In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report shall include DPR Primary and Archaeological Site Forms.

(14) In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the lead agency by the consulting archaeologist stating that the grading monitoring activities have been completed.

Alternative Mitigation Measures

If feasible, alternative mitigation measures that incorporate both data recovery and preservation may be acceptable. For example, depending upon the structural needs of the future development, structures that will be built within the recorded boundaries of the intact prehistoric midden deposit may be supported by caissons and aboveground, load-bearing beams, which limits disturbance to cultural deposits. Impacts associated with the locations of the caissons that must penetrate through the midden deposit are mitigated through the implementation of a data recovery program on a smaller scale. This can also be achieved through the use of stem wall structures limiting impacts to only the location of the stem walls and associated utilities. Conversely, the project could be redesigned to necessitate data recovery within one location of intact significant archaeological deposit while the other is preserved within open-space.

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

Energy resources include electricity, natural gas, and other fuels. Energy production and energy use both result in the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and the generation of pollutants. San Diego Gas and Electric (SDG&E) provides these energy resources to San Diego County, the City of El Cajon, and the Project Site. This section evaluates the potential impact created by this subdivision on these resources.

a. **No Impact.** The proposed project consists of a five-lot residential subdivision. The project would be designed and constructed in compliance with the existing land use and zoning designations for the subject property. Given the limited size of the development, the construction and operation of this proposed project would not require the creation of a new source of energy construction. During construction, there would be a temporary additional consumption of energy resources required for the movement of equipment and materials and construction of the subdivision; however, the duration and area of construction are considered minimal. Compliance with local, State, and federal regulations would reduce short-term energy demand during the project's construction to the extent feasible, and the project construction would not result in a wasteful or inefficient use of energy. No impact is anticipated and no mitigation measures are required.

b. **No Impact.** State and local agencies regulate the use and consumption of energy through various methods and programs. comply with current Energy Code and CALGreen standards, which require energy-efficient measures including solar ready roofs, increased lighting efficiency, and the installation of Energy Star appliances. The City of El Cajon's Building Division enforces the California Building Code (CBC) of Regulations Title 24, which establishes applicable energy efficiency standards for new housing. Prior to the issuance of building permits, future development of the residences must demonstrate compliance with Title 24 requirements. Therefore, with compliance with the aforementioned energy regulations the development of the proposed project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency. No impact is anticipated and no mitigation measures are required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Southern California is a seismically active region where the potential exists for people and structures to be exposed to strong ground shaking, ground failure, and soil instability. The nearest active faults to the Project Site are the La Nacion Fault Zone, approximately 10 miles southwest, the Rose Canyon Fault Zone, approximately 15 miles to the west, and the Coronado Bank Fault Zone located approximately 30 miles to the west. There are, however, no known active faults beneath or near the Project Site.

a. **i-iv Less Than Significant Impact.** The Alquist-Priolo Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the state geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist-Priolo Zones) around the surface traces of active faults and issue locational maps to all affected cities, counties, and state agencies for their use in safe construction. Before a project may be permitted, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults.

The California State Seismic Hazards Mapping Act of 1990 addresses earthquake hazards other than surface fault rupture, including liquefaction and seismically induced landslides. The state establishes city, county, and state agency responsibilities for identifying and mapping seismic hazard zones and mitigating seismic hazards to protect public health and safety. The act requires the California Department of Conservation, Division of Mines and Geology, to map seismic hazards and establishes specific criteria for project approval that apply within seismic hazard zones, including the requirement for a geological technical report.

The California Building Code (CBC), Title 24 applies to all applications for building permits. The CBC classifies all of San Diego County with the highest seismic zone criteria, Zone 4. The Alquist-Priolo Act requires special notification and development requirements when a proposed development is located within five miles of a defined Alquist-Priolo fault zone.

The proposed project is located in an area where the risks of damage due to fault rupture, strong seismic ground shaking, liquefaction, and landslides are low. This is due to the distance from the closest known Alquist-Priolo fault over 10 miles away, that there are no known faults under the Project Site and that surface rupture typically occurs on preexisting faults, that the Project Site is located on a rocky knoll, above groundwater levels that could potentially result in liquefication and is located outside the liquefaction zone identified the Liquification Zone Map in the City of El Cajon's Safety Element. Further, the soil profile on the Project Site is a granitic rock that has a low risk of landslide and the site is located away from the Fletcher Hills area along Fletcher Parkway that the City's Safety Element identifies as having a higher risk of landslides. Given the above information, The proposed project would not extend into any undeveloped or previously undisturbed areas that may become unstable resulting in potential landslides. The underlying geologic structure of the project site would not become unstable as a result of the project and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant.

b. **Less than Significant Impact.** The soils on the project site are identified as Cienba-Fallbrook. The geotechnical report prepared by Advanced Geotechnical Solutions; Inc. (August 21, 2023) noted that the top two feet of top soils consist of loose, silty fine-to medium grained sand. As sandy, granitic soil it is susceptible to erosion. The project, however, will not result in substantial soil erosion or the loss of topsoil because of the project's required compliance with several State and City programs and ordinances. First, there are no significant drainage features or water sources on the site. Grading of the project site is limited thereby minimizing disturbance of the natural terrain. Grading will be required to comply with the Hillside Overlay Zone development requirements that limits the intensity of grading activities. The applicant will be required to prepare a Standard Urban Storm Water Mitigation Plan and Storm Water Pollution Prevention Plan that includes Best Management Practices (BMPs) to ensure sediment does not erode from the project site. Project grading will conform to the City ordinances regarding grading and the Urban Storm Water Mitigation Plan. As such, the proposed project would not result in substantial soil erosion or the loss of topsoil, and impacts would be considered less than significant.

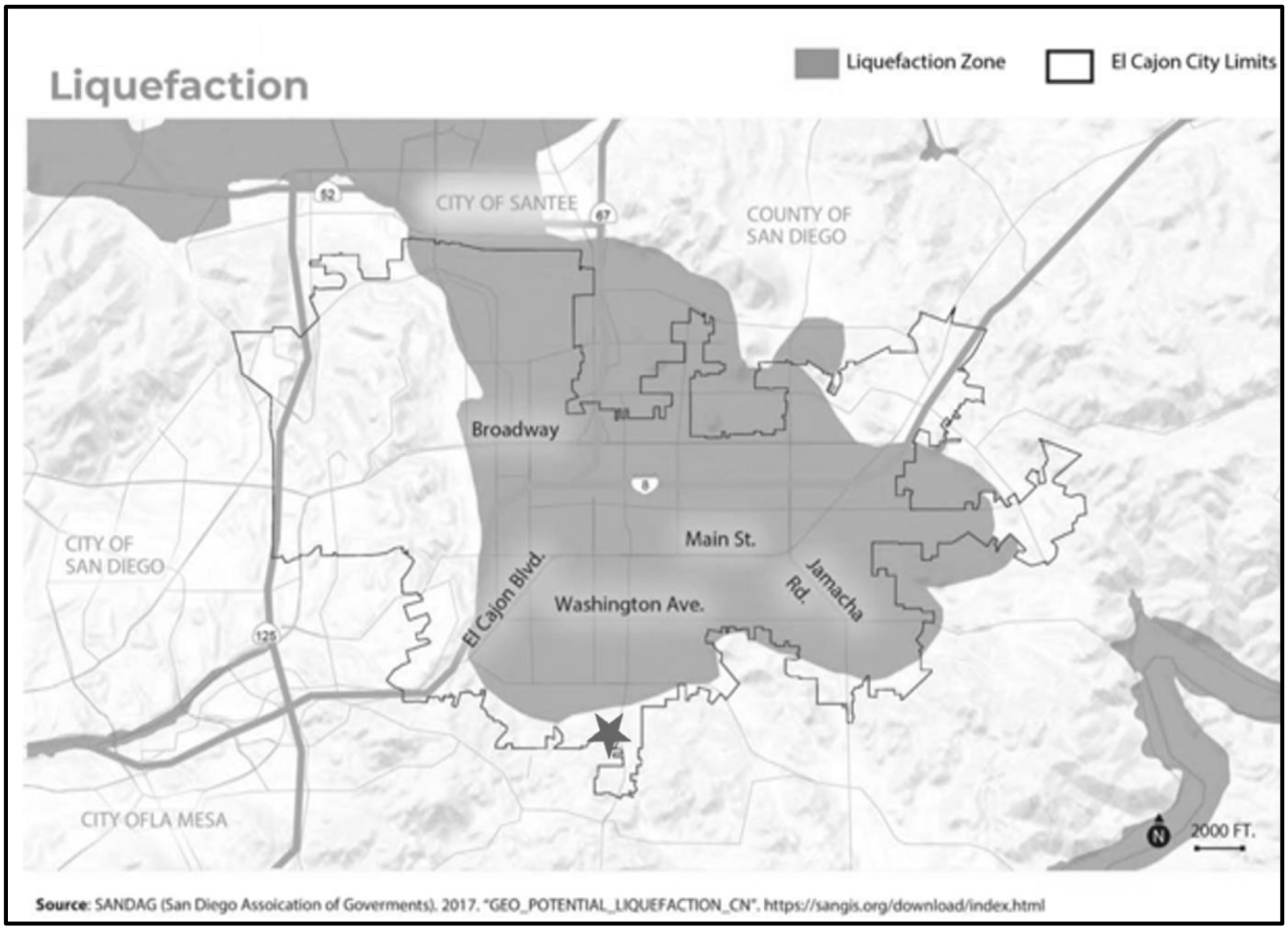
c. **Less-than-Significant Impact.** Based on data provided in the Existing Conditions section of the City of El Cajon's Safety Element, historically significant landslides have occurred in areas in and around El Cajon but mainly in the Fletcher Hills area along Fletcher Parkway. Although over half of El Cajon is in a liquefaction risk area, the areas of higher risk are located east of Cuyamaca Street and not near the project site. The project site and surrounding properties are underlain by granite and contain granitic

soils. This geologic unit is very stable and is not likely to become unstable as a result of the proposed project.

The proposed subdivision would not extend into any undeveloped or previously undisturbed areas that may become unstable as a result of the project, resulting in potential landslides on- or off-site. Therefore, the underlying geologic structure of the project site would not become unstable as a result of the project and potentially result in any on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, any potential impacts would be less than significant.

d. **No Impact.** Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, and drought. Expansive soils often contain a higher percentage of clays, that swell when wet and can, in turn, cause damage to building foundations, roadways and utilities. The soils report for the property indicates the topsoil consists of approximately two feet of fine-grained loamy sand underlain by weathered granitic rock. Harder granitic rock lies further down. Based on the findings in the soils report the onsite materials exhibit very low to low expansion potential. Therefore, no impact is anticipated and no mitigation measures are required.

e. **No Impact.** The soils report prepared for the project indicated the site's soil profile consists of approximately two feet of sandy topsoil, followed by approximately four feet of weather-decomposed granite, followed further by more dense, hard granitic rock. This profile could potentially present limits on septic systems. The project, however, proposes the installation of sewer lines to each house that will connect to the City's sewer system in Avocado Avenue. Therefore, no impact is anticipated and no mitigation measures are required.



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

Greenhouse gases (GHG), allow solar radiation (sunlight) into the Earth's atmosphere, but prevent radiative heat from escaping, thus warming the Earth's atmosphere. GHGs are emitted by both natural processes and human activities; and the accumulation of GHGs in the atmosphere regulates the Earth's temperature. Emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the greenhouse effect and contributing to global warming. GHG impacts that attributable to this proposed project are emissions associated with construction activities and operations related to traffic and energy use.

A Greenhouse Gas Screening Report was prepared by Ldn Consulting, dated October 12, 2023, for this Project. The purpose of this greenhouse gas (GHG) screening assessment is to determine GHG significance under the California Environmental Quality Act (CEQA) from both the construction and operations of the Project. More specifically, this screening analysis is to provide documentation showing Project conformance with greenhouse gas laws and regulations.

a. **Less-than-Significant Impact.** The City does not currently have GHG specific significance thresholds established as of the date of this report. Based on this, the City does recognize other methodologies to show compliance under CEQA. Currently, the preferred method is to show that the Project would conform to California's 2022 Scoping Plan (CARB, 2022) roadmap which provides general recommendations which local agencies could adopt to help the State achieve the overall scoping plan goal of achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan extends and expands upon these earlier plans by reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Appendix "D" of CARB's 2022 Scoping Plan recommends multiple examples of GHG source types that local CAPs could consider to reduce emissions. These include adding 2 kilowatts of solar (solar panels) per house and the installation electric vehicle supply equipment in each house.

   A California Emissions Estimator Model (CalEEMod) was used to calculate anticipated construction activities, which was developed by South Coast Air Quality Management District (SCAQMD) in 2022. Based on the construction model outputs the report found that construction of the project will produce approximately 245 MT CO2e/year during the construction period. Since GHG emissions are typically reported on an annual basis, it is acceptable to average the total construction emission over the life of the Project, which is assumed to be 30 years. Based on this, the project would add 8.17 MT CO2e per year. A guidance a 900-metric-ton of carbon dioxide equivalent (MTCO2E) screening criterion is used to determine when a detailed GHG analysis would be required. Projects that do not exceed 900 MTCO2E are not required by the City to prepare a detailed GHG technical analysis report and the impacts, proposed by this project, are considered less than significant.

b. **Less-than-Significant Impact.** According to the SCAQMD guidance, the 900 MTCO2E criterion was designed to set the emission threshold low enough to exclude smaller projects from the State's Assembly Bill 32 mandate. As the project is below the 900 MTCO2E threshold, it would not conflict with Assembly Bill 32's mandate for reducing GHG emissions. As such, the project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions and any potential impacts would be considered less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code§ 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 or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

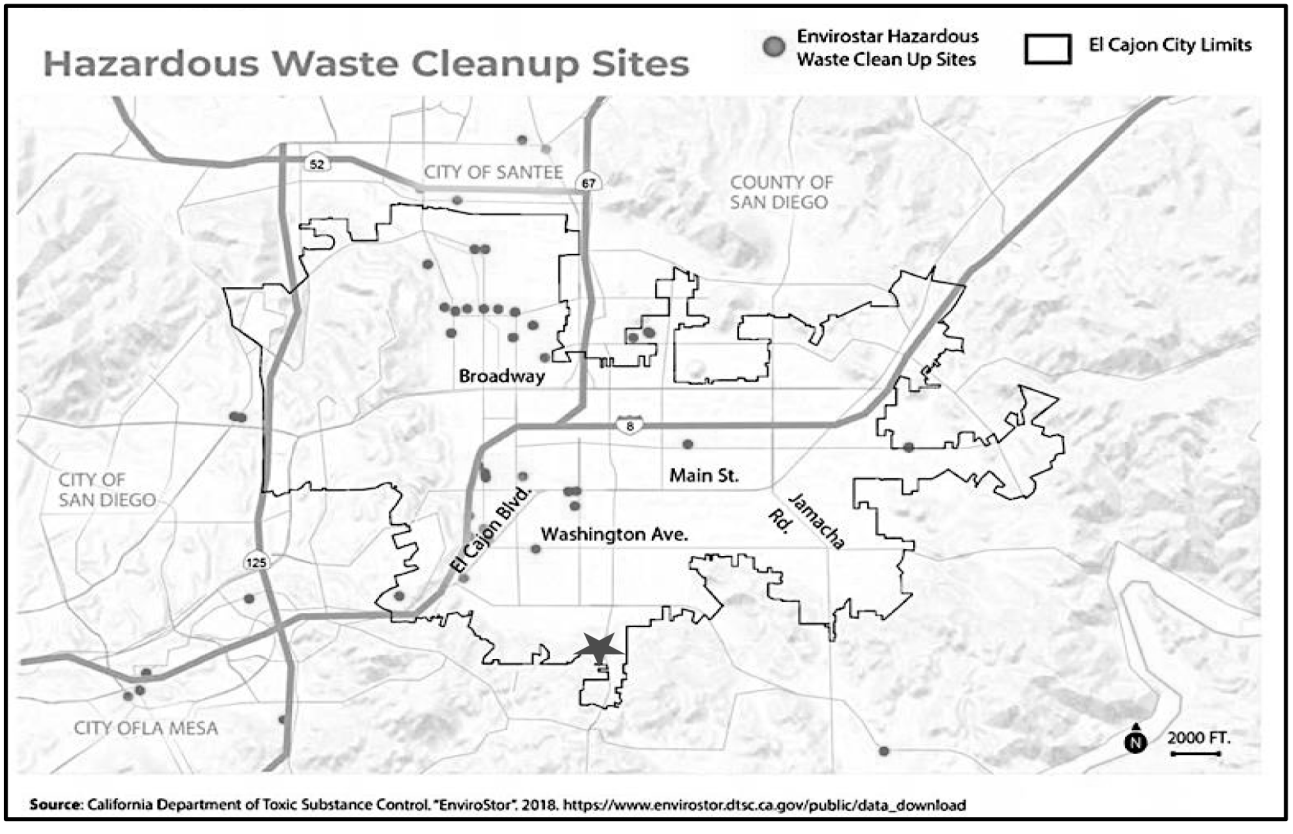
Hazardous materials may be used in association with the construction of the subdivision and subsequent development of the single-family homes. This section evaluates the potential impacts associated with the development of the project site as it relates to the: transport or disposal of hazardous materials, release of hazardous materials as a result of upset or accident, being listed on a State of California hazardous materials site, creation of a health risk to nearby schools, and/or expose people or structures to a significant risk involving wildland fires

a. **No Impact.** The project proposes the subdivision of 2.45 acres into five residential lots. Construction of the residential lots and future homes would involve the transport, use, and disposal of limited quantities of hazardous materials, such as fuel, solvents, paints, oils, and lubricants. Commercial transporters of hazardous materials must comply with California Vehicle Code Section 3103, which specifies transportation routes with the least overall travel time and prohibits transportation of hazardous materials through residential neighborhoods. Hazardous materials (such as pesticides, fertilizers, gasoline, and solvents) commonly used in landscaping and maintenance will be used at the project site in routine landscaping and other facility maintenance activities. If not properly used and stored, such materials could create hazards. Federal and state laws require labeling of all such materials. The labeling identifies use, storage, and disposal instructions. As such, with compliance with State vehicle code requirements and product labeling the project would not create a significant hazard to the public or the environment involving the transport and use of hazardous materials. No impact is anticipated and no mitigation measures are required.

b. **No Impact.** As noted in IX a., development of the project site and construction of the future homes would involve the use of typical construction related hazardous materials. The public is protected through compliance with federal, state, and local regulations, in combination with construction BMPs required with implemented of their Storm Water Pollution Prevention Plan. Combined, these regulations would help ensure that hazardous materials would be used and stored properly, thereby minimizing potential impacts due to an accidental release of hazardous materials. No impact is anticipated and no mitigation measures are required.

c. **Less-than-Significant Impact.** The proposed subdivision is located approximately 0.15 miles south of Chase Elementary School. It is also located approximately 140 feet higher in elevation. The project site is separated from school the by a new 27 lot subdivision. No hazardous materials are expected to be used during construction, other than those that are typically associated with construction as noted above. The school and surrounding land uses would be protected during transport and construction through project compliance with federal, state, and local regulations that regulate hazardous materials in combination with construction BMPs required with implemented of their Storm Water Pollution Prevention Plan. Therefore, construction and operational impacts would be considered less than significant.

d. **Less than Significant Impact**. A review of available online regulatory databases found that the project site is not listed in a hazardous materials database, including the DTSC Hazardous Waste Tracking System; DTSC EnviroStor and SWRCB GeoTracker. The Project Site is undeveloped and there no evidence of the past use, storage, or disposal of hazardous materials on the Project Site. Therefore, construction and operational impacts would be considered less than significant.



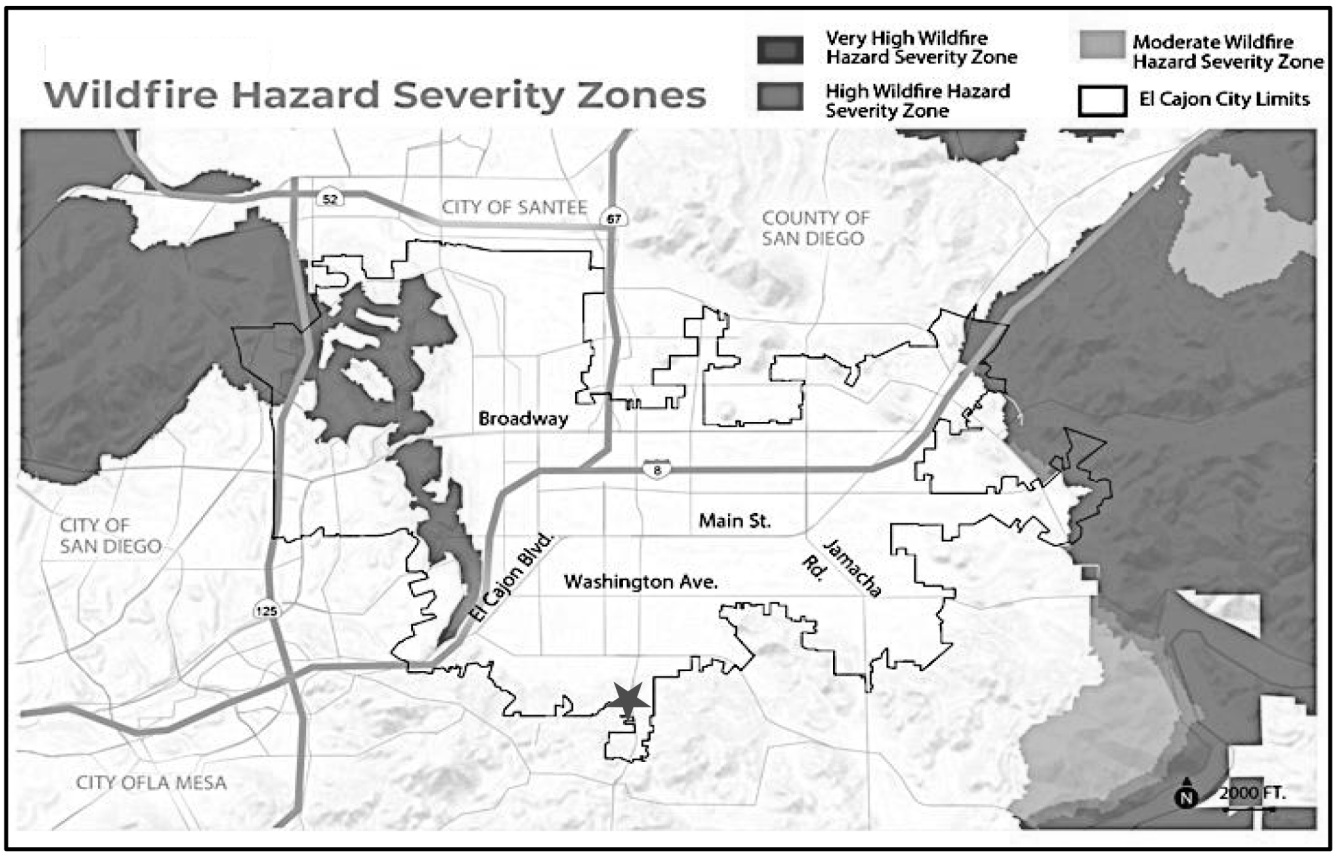
e. **No Impact.** Gillespie Field Airport is located within the City, but is located approximately 3.5 miles north from the project site. Nor are there any private air strips within two miles of the proposed subdivision. The Gillespie Field Land Use Compatibility Plan 2010 indicates that the Project Site is located outside of its protected air space, significant noise contours and typical flight paths. Equally, the Project Site does not fall within the Airport Review Area, Airport Overflight Notification Area, or any other safety zone.

Therefore, the project would result in no impact relative to airport hazards. No impact is anticipated and no mitigation measures are required.

f. **Less Than Significant Impact.** The City of El Cajon has adopted the 2023 County of San Diego Multi-Jurisdictional Hazard Mitigation Plan. During construction and operation, the proposed project would comply with all applicable measures in the Plan as well as requirements of the Heartland Fire and Rescue Department and the City's General Plan. The City of El Cajon has adopted emergency evacuation routes in and out of the City. Interstate 8 provides the primary east–west movement, and State Route 67 provides a northerly route across the San Diego River. Jamacha Road and Avocado Avenue provide southerly routes out of the City. During an emergency County of San Diego Emergency Operations Center and El Cajon Police would facilitate the proper instructions and routes.

Construction activities may temporarily inhibit traffic along Avocado Avenue. Such activities could include the delivery of bulldozers, dump trucks and construction materials. This type of interruption would be short term. The proposed subdivision will connect to the City's sewer system. Development of the subdivision will require the installation of a new sewer line in Cajon View Drive that will connect to a City sewer main in the center of Avocado Avenue. This improvement may require the temporary closure of the southbound lanes depending on the method of construction. The contractor will be required to prepare and receive approval from the City for design and improvement plans, a right-of-way permit, and a traffic control plan that addresses traffic safety, flow, and emergency access. Even with the sewer line improvement, the proposed project would not result in permanent impacts on emergency response routes or plan. Therefore, the impact would be considered less than significant.

g. **Less Than Significant Impact.** The State requires the preparation of Very High Fire Hazard Area maps to assist in providing location and criteria to minimize risk from wildfires. According to information obtained from CAL FIRE, and the City of El Cajon Safety Element, the project site is not within a Very High Fire Hazard Severity Zone (CAL FIRE 2020). Most of El Cajon is built out and outside of fire risk areas. Natural lands in the County of San Diego to the east and north of El Cajon in high fire severity zones pose the greatest risk to El Cajon. Wildfires can start outside and spread into the City, or can create dangerous air pollution by blowing ash and embers into El Cajon. The proposed project is an infill development. Single family homes border the parcel on three sides with Avocado Avenue on the fourth. The site is undeveloped and contains developed graded areas, Diegan coastal sage scrub, and Buckwheat scrub. San Diego County, including El Cajon, is more routinely subject to wildfires due to its type of vegetation, climate, drought, and proximity to wildland/urban interface. Although there is some native vegetation onsite, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss or impact relative to wildland fire hazards. Given the Project Site is not located within a VHFHA and will require fire management zones around each house any potential impacts related to wildfires are considered less than significant.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a 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 offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The subject parcels have existing drainage patterns and volumes of runoff that have occurred undisturbed for years. Approval of the subdivision has the potential to change drainage patterns, increase the amount of drainage waters leaving the site and potentially introduce new pollutants. Additionally, this section evaluates the projects impact on local ground water and whether the parcels' location is subject ocean tsunamis or within a dam inundation area. As part of their clean water programs the State and City of El Cajon have regulations and procedures specifically designed to regulate the volumes, quality and location of drainage waters in connection with new development. The discussion below evaluates if this project will impact the existing drainage waters and how it will address potential impacts created by the subdivision.

a. **Less than Significant Impact.** The proposed five lot residential project is an infill site within an urbanized area. The project could result in an incremental increase in surface water pollutants, such as sediment, oil, and grease, from construction of the single-family homes. This could include site grading, the installation of utilities and the construction of street infrastructure. As construction of the proposed project would disturb more than one acre it would require the preparation and implementation of a Stormwater Pollution Prevention Plan SWPPP, implementation of BMPs, and the submittal of Erosion Control Plans in accordance with the Construction General Permit. The SWPPP would list the BMPs that would be implemented to provide sediment and erosion control, authorize waste handling measures, and protect areas from stormwater runoff. Consistency with this regulatory framework would adequately ensure that the project would have a less than significant impact on water quality.

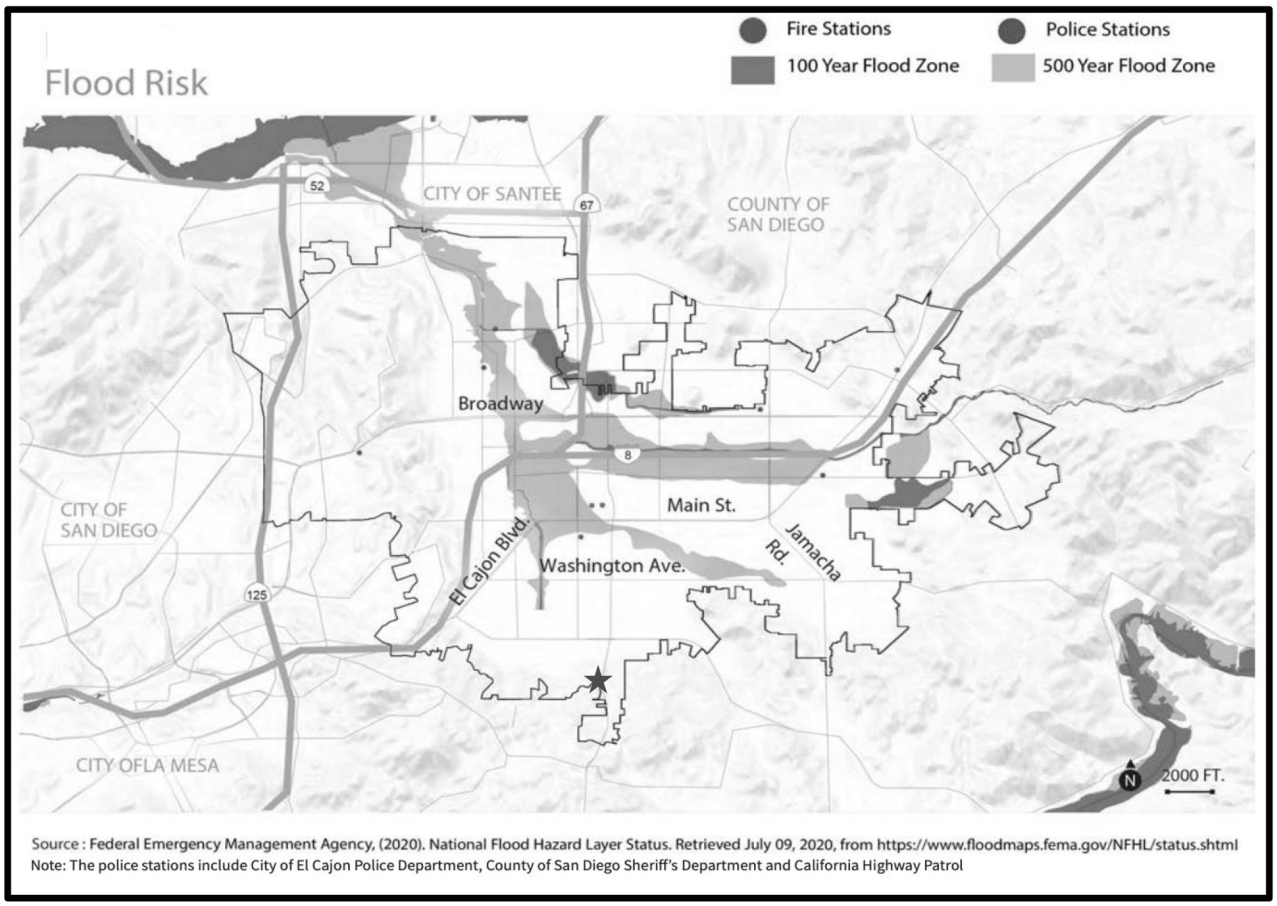
b. **No Impact.** The proposed project would involve subdivision of 2.45 acres into five lots for development of single-family homes. Development of the residences would increase impervious surfaces on the project site and, thus, reduce the infiltration of water into the groundwater basin. However, bio-detention basins will be constructed on each lot and along Cajon View Drive to collect stormwater runoff that will percolate back into the ground improving groundwater recharge. The proposed project would receive water from the City's municipal water supplier, the Helix Water District and Padre Dam Municipal Water District, and would not use groundwater or otherwise affect groundwater levels. No wells are proposed at this time. Therefore, there would be no impact on groundwater supplies. No impact is anticipated and no mitigation measures are required.

c. **i-iv. Less than Significant Impact.** The Project Site is located on a knoll midway along a large north/south facing hillside. Current drainage patterns flow generally east to Avocado Avenue and then north. City regulations prohibit new development from creating runoff volumes or velocities that could cause the City's existing drainage system to exceed its design capacity. To that end, the project has been designed to incorporate stormwater bio-detention basins on each lot and along Cajon View Drive to capture, contain, and treat drainage waters. The basins are sized to ensure that the amount of runoff does not exceed the capacity of existing conditions and drainage systems. As such, the project will not create a new significant increase in the amount of offsite flooding, siltation and/or pollutants and therefore would not conflict with existing or proposed drainage systems. Implementation of these stormwater/drainage improvements would adequately ensure that the project would have a less than significant impact on water quality.

d. **No Impact.** The project site is located approximately 17 miles west and 500 feet higher in elevation from the Pacific Ocean and approximately 12 miles from San Diego Bay. The site is not within a FEMA-designated 100-year flood zone nor within any dam inundation area. The closest dam to the project site is at Lake Jennings, locate approximately 6.5 miles to the northeast, and whose inundation area flows to the west, away from the project site. As such, pollutant releases from a flood hazard, tsunami, seiches or flooding are unlikely. No impact is anticipated and no mitigation measures are required.

f. **Less than Significant Impact.** New development in the City of El Cajon must comply, and be consistent with, with the City's Stormwater Pollution Prevention Plan, Erosion Control Plans and grading regulations in accordance with the Construction General Permit and National Pollution Discharge Elimination System program. Combined these requirements regulate the containment, pollutants, flow and velocities of drainage waters leaving the site. The bio-detention basins, located on each lot and along Cajon View Drive capture, contain, and treat drainage waters that encourage groundwater recharge. Implementation

of these stormwater/drainage improvements would not conflict with any groundwater plan and whose goal is to protect the water quality within streams, rivers and groundwater basin. As such, the project would have a less than significant impact on water quality.



Source : Federal Emergency Management Agency, (2020). National Flood Hazard Layer Status. Retrieved July 09, 2020, from https://www.floodmaps.fema.gov/NFHL/status.shtml
Note: The police stations include City of El Cajon Police Department, County of San Diego Sheriff's Department and California Highway Patrol

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

The City of El Cajon General Plan establishes goals and policies that are used to implement desired development in the City. Implementation of these goals and policies are regulated through guidelines, standards, regulations, and ordinances contained within the municipal code. The proposed five lot subdivision has been designed to comply with the City's regulations and ordinances without variance.

a. **No Impact.** The Project Site is situated in the northwest corner of the intersection between Cajon View Drive and Avocado Avenue. Developed single family homes border the subject parcel to the north, south and west. Avocado Avenue borders the subject site to the east. Additional single-family homes are located on the hillsides on the east side of Avocado Avenue. As the proposed subdivision is surrounded by existing residential land uses, it is considered to be an infill project and would, therefore, not physically divide an established residential community. As existing local streets, such Avocado Avenue and Cajon

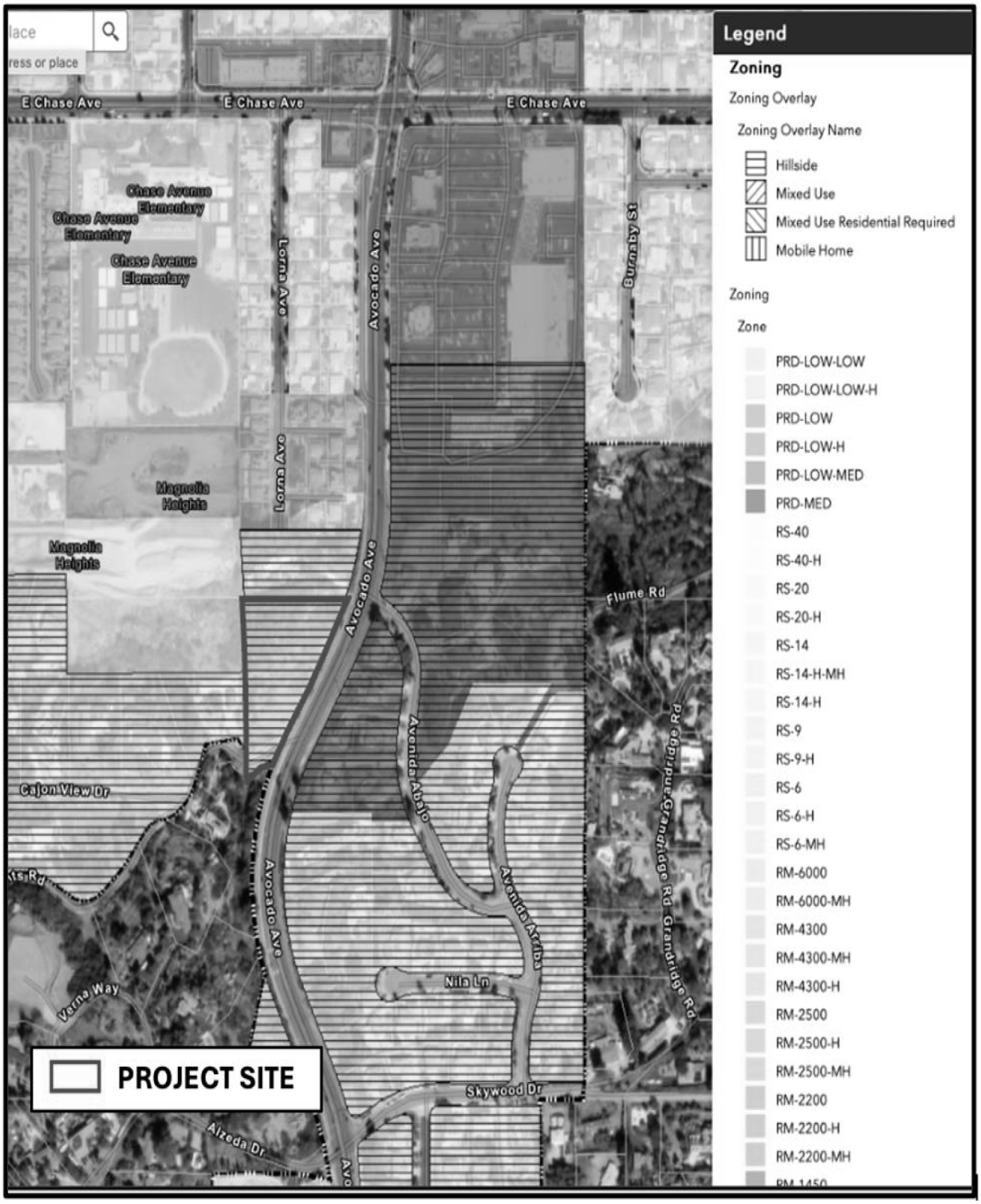
View Drive, would not be closed or redirected as part of this development, the project would not divide the existing community. Nor would the proposed development block any existing paths or other routes of travel. No impact is anticipated and no mitigation measures are required.

b. **No Impact**. The subject parcels have a land use designated of Low Density Residential and a zoning designation of RS-14 in the El Cajon General Plan. The parcels are also located within the City's Hillside Overlay Zone. The project proposes to subdivide the parcels into five distinct residential lots, each varying in size between 10,600 square feet and 21,100 square feet. These lot sizes conform to the established zoning criteria of the City, with the net average lot size amounting to 14,500 square feet. Equally, the grading plan for the subdivision has been designed to comply with the goals and development guidelines of the Hillside Overlay Zone.

The Project Site is located within the Draft El Cajon Multiple Species Conservation Program (MSCP) Subarea Plan boundary. This Plan has not been adopted and is located outside of the final County of San Diego Biological Resources Core Area. As such, biological impacts associated with the removal of native habitat from the development site will be mitigated offsite utilizing comparable habitat at recommended replacement ratios.

The development of residential units and roads will create additional impervious surfaces. The project will comply with the City's grading, stormwater, and water quality guidelines and requirements. Given the aforementioned project features, the proposed project will be consistent, and comply with local land use plans, policies, and regulations. No impact is anticipated and no mitigation measures are required.

Figure 8 - City of El Cajon Land Use and Zoning Map



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a 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?	☐	☐	☐	☒

The State Surface Mining and Reclamation Act (SMARA) requires cities to incorporate into their General Plans the mapped locations of valuable mineral resources zones (MRZ). The State Mineral Resources Map identifies the El Cajon area as MRZ-3. This means that valuable mineral resources are potentially available, but their location, if any, are unknown.

a.& b. **No Impact.** The Conservation Element of the City's General Plan states that El Cajon has developed primarily as an urban area and that there are no commercial deposits of ores or minerals. The project site is underlain by granite and is covered by granitic rock outcroppings and a fine granitic topsoil. This type of mineral has little or no commercial value. The Project Site is not delineated on any local general plans, specific plans, or other land use plans indicating locally-important and significant mineral resource recovery sites. Further, there are currently no mineral extraction activities at the project site and no activities will be available in the future. The proposed project will not result in a loss of mineral resources. No impact is anticipated and no mitigation measures are required.

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

VIII. 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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The Project Site is located on the northwest corner of Avocado Avenue and Cajon View Drive. With over 26,000 trips per day and a speed limit of 45 miles per hour (mph) Avocado Avenue generates the main source of noise on the Project Site. While Cajon View Drive provides a direct connection to the subdivision, it is a narrow roadway used primarily by local traffic with a speed limit of 25 miles mph. Due to the limited traffic volumes and low speed limit, traffic noise levels are typically low on this roadway. Other sources of ambient noise at the Project Site include single-family residences that border the subject parcel to the north, south and west.

Implementation of the proposed project would result in a permanent, but less than significant increase in traffic volumes on the local roadways. According to the Trip Generation and VMT Screening Analysis prepared by LOS Engineering, Inc. dated September 11, 2023 for the subdivision map, the proposed project would generate only 50 vehicle trips per day. This is less than the 110 VTD required to prepare a full traffic study. The amount of traffic generated by the proposed project would not be considered significant compared with traffic under existing conditions in the project area. The primary noise-sensitive receptors that could be affected by noise from project-related traffic are residences located adjacent to Avocado Avenue. The small amount of traffic generated by the project would not significantly increase traffic noise levels along the affected roadways. However, the noise generated by Avocado Avenue is significant enough to impact the residents that will live in the new homes created by the subdivision.

a. **Less Than Significant Impact with Mitigation Incorporated.** California requires each local government entity to perform noise studies and implement a noise element as part of its General Plan. The purpose of the noise element is to limit the exposure of the community to excessive noise levels. It is particularly relevant to new residential development and the construction of new roadways.

   The Noise Ordinance specifies maximum one-hour average sound level limits at the boundary of a property. Impacts to sensitive receptors generated by activities at a given location are regulated by the City's Municipal Code. The City of El Cajon General Plan contain objectives and policies intended to address and protect sensitive land use receptors. Said objectives and policies include:

   - **Objective 8-3:** Reduce levels of noise so they do not adversely affect the physiological, psychological, or sociological well-being of the citizens of El Cajon.

   - **Policy 8-3.2:** Noise-attenuating measures, such as special building insulation, increased setbacks, walls, landscaping, etc., shall be required whenever any residential noise-sensitive land uses are proposed in the noise impact area of a major transportation facility, as indicated on the noise contour map on file in the office of the Department of Community Development.

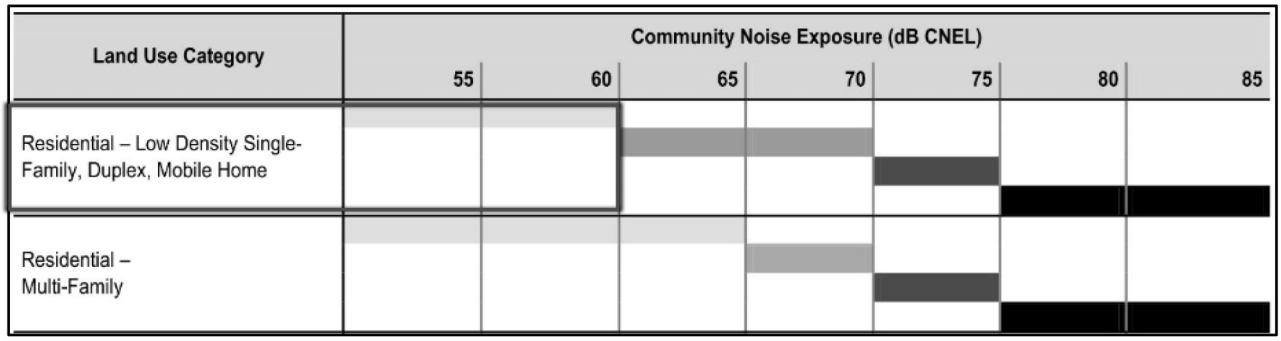
   - **Policy 8-3.8:** In order to minimize noise impacts from noise sources, the City may require site design considerations, such as increased setbacks, sound attenuating walls, and landscaping, and may

also require building design considerations, such as type of construction, insulation, and orientation of building openings.

Section 17.115.130 of the City of El Cajon Municipal Code provides the City's Noise Ordinance. The City sets limits on the level of noise that may affect residential properties. As noted in the table below, the ordinance provides stricter noise limits at night to reflect the fact that people are typically more sensitive to noise during nighttime hours. It should be noted that the noise limits equally apply to the hours when construction activities can start and end.

Zones	Time of Day	One-Hour Average Sound Level Decibels
All residentially zoned properties		
	7 a.m.—7 p.m.	60
	7 p.m.—10 p.m.	55
	10 p.m.—7 a.m.	50

The City of El Cajon General Plan Noise Element has adopted the State of California Land Use Compatibility Guidelines, noted below, to determine the compatibility of land use when evaluating proposed development projects.



The goal for maximum outdoor noise levels in residential areas is a CNEL of 60 dBA. This level is a requirement for the design and location of future development and a goal for the reduction of noise in existing development. Based upon these guidelines, single-family residential areas are considered normally acceptable with maximum exterior noise levels of up to 60 dBA CNEL. Additionally, interior noise levels should be mitigated to a maximum of 45 dBA CNEL in all habitual rooms when the exterior of the residence is exposed to levels of 60 dBA CNEL or more.

To determine the potential noise impact generated by traffic on Avocado Avenue, noise measurements were taken on the subject parcel on October 4, 2023. The critical model input parameters, which determine the projected vehicular traffic noise levels, include vehicle travel speeds, the percentages of automobiles, medium trucks and heavy trucks in the roadway volume, the site conditions and the peak hour traffic volume. The noise analysis is also required to take into consideration buildout conditions in the project vicinity in the year 2050. Under this scenario, traffic volume forecasts provided by SANDAG Series ABM2+/2021 RP Traffic Prediction Model, indicate traffic volumes on Avocado Avenue will increase by 2,700 ADT. Or from 26,500 ADT today to 29,200 in 2050. The results of the noise level measurement are presented in the Table 4, below.

Table 4 - Future Exterior Noise Levels

Receptor Number	Unmitigated Noise Levels (dBA CNEL)	Mitigation Barrier Height (Feet)	Ground Floor Mitigated Noise Levels (dBA CNEL)[1]	Building Façade Noise Levels (dBA CNEL)[1]
1	**65**	**6**	60	69
2	**64**	**6**	58	69
3	**68**	**6**	60	71
4	**63**	**6**	57	67
5	55	0	55	60
[1] Interior Noise Study required per City Guidelines if building façade is above 60 dBA CNEL.				

In evaluating the potential noise impacts on future residents, private front yards are not considered noise-sensitive areas. However, back yards are because typically, noise sensitive, living area and bedroom doors and windows are located on this building elevation. Therefore, the noise analysis focuses on the back yards. The closest back yard, Lot 3, is located approximately 110 feet from the centerline of Avocado Avenue. As noted in the table, Community Noise Equivalent Level (CNEL) noise levels in four of the five lots exceed the 60 dBA maximum General Plan noise level and will require mitigation to reduce the noise levels. Lot five, located behind the other proposed single-family homes, is projected to have a 55 dBA level and will not require mitigation.

With respect to interior noise levels, the California Building Code regulates acceptable interior noise levels through the building permit process. Interior noise levels should meet the Title 24, 45-dBA CNEL requirement. Typically, standard construction, including upgraded windows, would provide sufficient exterior-to-interior noise reduction to provide a comfortable interior noise environment. In order to reduce project impacts to “less than significant”, the following mitigation measure is recommended:

MM-Noise-1. The modeling results for the Buildout analysis are quantitatively shown in Figure 8 for the private rear yards. Based upon these findings, exterior noise from vehicular traffic along Avocado Avenue were determined to be above the City’s 60 dBA CNEL threshold for single-family residences without mitigation. Noise mitigation in the form of 6-foot barriers located at the top of pads of Lots 1 through 4 would be necessary to comply with the City of El Cajon Noise standards for single-family residences based on transportation related noise as shown in Figure 9.

- Noise barriers, or sound walls, must be constructed on the back, or rear yard elevations on Lots 1, 2, 3, and 4.
- Each wall must be six (6) feet high)
- The noise barriers must be constructed of a non-gapping material consisting of masonry, wood, plastic, fiberglass, glass, vinyl, steel, or a combination of those materials, with no cracks or gaps through or below the enclosure walls. Barrier wall construction will be subject to the approval of the El Cajon Building and Planning Departments.

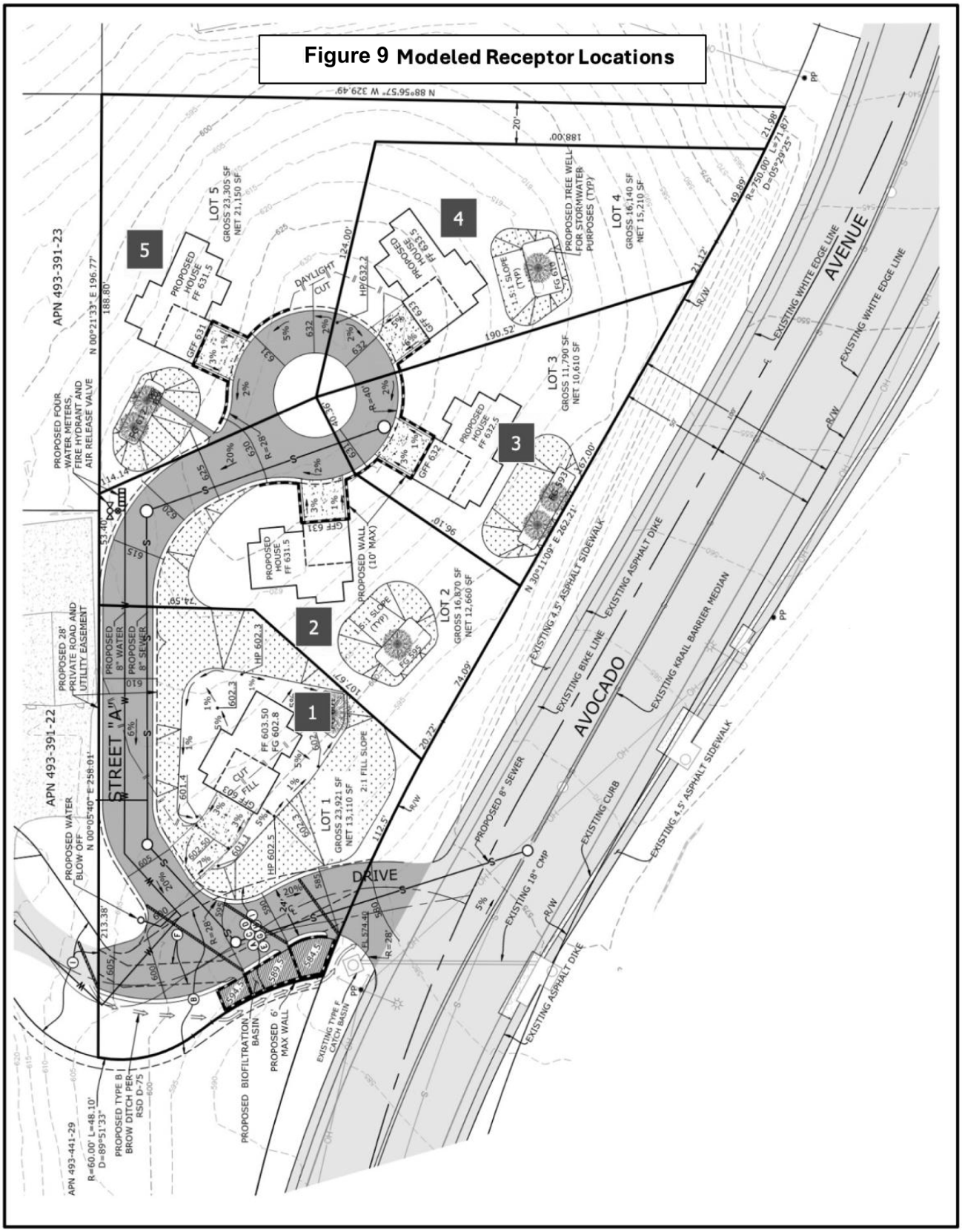


Figure 9 Modeled Receptor Locations
APN 493-391-23
APN 493-391-22
APN 493-441-29
STREET "A"
AVOCADO AVENUE
DRIVE
LOT 1
GROSS 23,921 SF
NET 13,110 SF
LOT 2
GROSS 16,870 SF
NET 12,660 SF
LOT 3
GROSS 11,790 SF
NET 10,610 SF
LOT 4
GROSS 16,140 SF
NET 15,210 SF
LOT 5
GROSS 23,305 SF
NET 21,150 SF
PROPOSED HOUSE FF 631.5
PROPOSED HOUSE FF 633.5
PROPOSED HOUSE FF 622.5
PROPOSED WALL (10' MAX)
PROPOSED 28' PRIVATE ROAD AND UTILITY EASEMENT
PROPOSED 8" WATER
PROPOSED 8" SEWER
PROPOSED WATER BLOW OFF
PROPOSED FOUR WATER METERS, FIRE HYDRANT AND AIR RELEASE VALVE
PROPOSED TREE WELL FOR STORMWATER PURPOSES (TYP)
PROPOSED TYPE B BROW DITCH PER RSD D-75
PROPOSED BIOFILTRATION BASIN
PROPOSED 6' MAX WALL
PROPOSED 8" SEWER
EXISTING 18" CMP
EXISTING TYPE F CATCH BASIN
EXISTING 4.5' ASPHALT SIDEWALK
EXISTING ASPHALT DIKE
EXISTING BIKE LANE
EXISTING KRAIL BARRIER MEDIAN
EXISTING CURB
EXISTING WHITE EDGE LINE
DAYLIGHT CUT
CUT
FILL
2:1 FILL SLOPE
1.5:1 SLOPE (TYP)
R/W
1
2
3
4
5

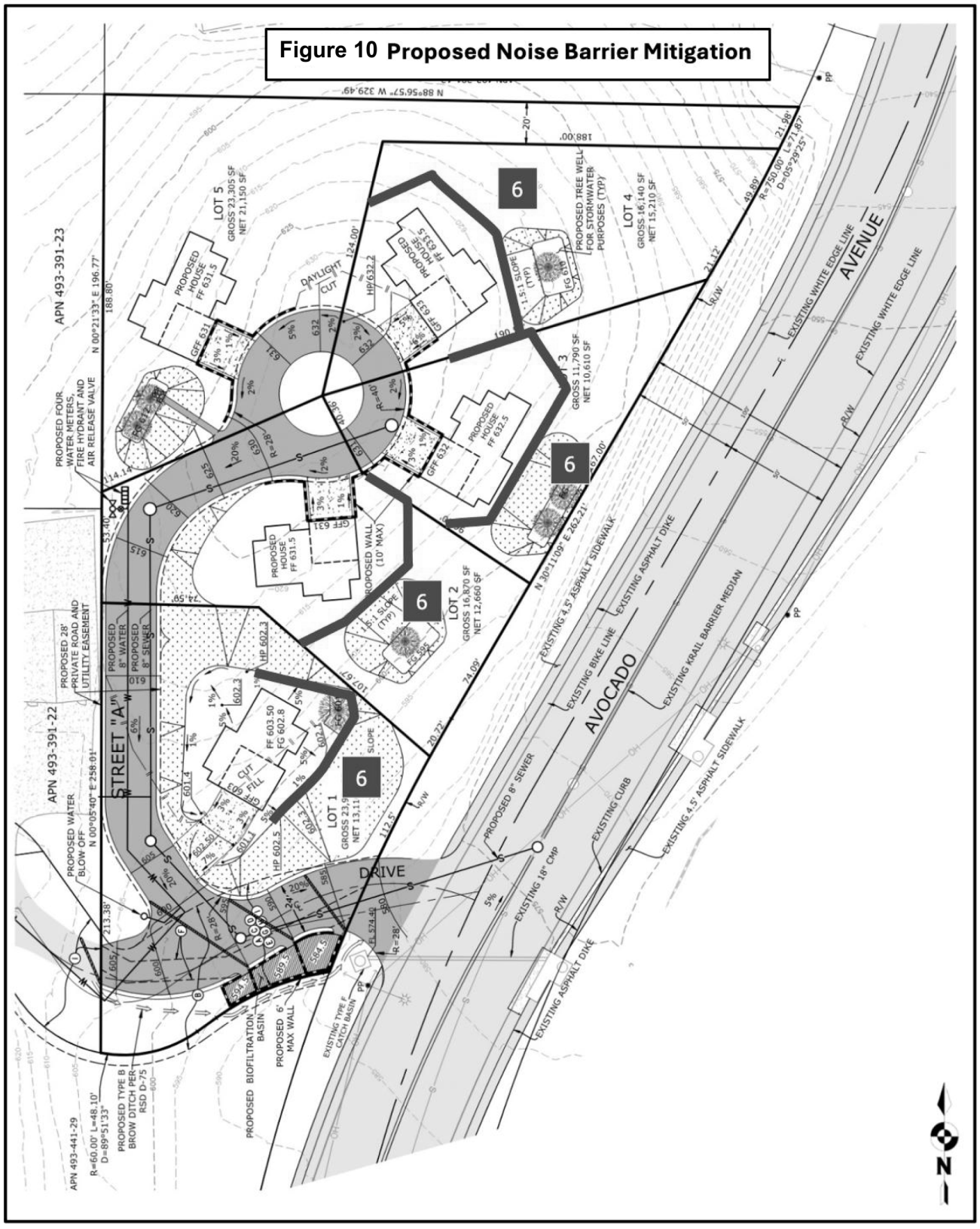


Figure 10 Proposed Noise Barrier Mitigation
LOT 5
GROSS 23,305 SF
NET 21,150 SF
LOT 4
GROSS 16,140 SF
NET 15,210 SF
LOT 3
GROSS 11,790 SF
NET 10,610 SF
LOT 2
GROSS 16,870 SF
NET 12,660 SF
LOT 1
GROSS 23,9
NET 13,11
PROPOSED HOUSE FF 631.5
PROPOSED HOUSE FF 632.5
PROPOSED NOISE BARRIER 5
PROPOSED TREE WELL FOR STORMWATER PURPOSES (TYP)
PROPOSED WALL (10' MAX)
PROPOSED FOUR WATER METERS, FIRE HYDRANT AND AIR RELEASE VALVE
PROPOSED 28' PRIVATE ROAD AND UTILITY EASEMENT
PROPOSED 8" WATER
PROPOSED 8" SEWER
PROPOSED WATER BLOW OFF
PROPOSED TYPE B BROW DITCH PER RSD D-75
PROPOSED BIOFILTRATION BASIN
PROPOSED 6' MAX WALL
PROPOSED 8" SEWER
EXISTING 18" CMP
EXISTING TYPE F CATCH BASIN
EXISTING 4.5' ASPHALT SIDEWALK
EXISTING BIKE LINE
EXISTING ASPHALT DIKE
EXISTING KRAIL BARRIER MEDIAN
EXISTING CURB
EXISTING WHITE EDGE LINE
APN 493-391-23
APN 493-391-22
APN 493-441-29
STREET "A"
DRIVE
AVOCADO
AVENUE
6
N

Construction Noise Levels

The development construction will consist of grading, building construction, architectural coating, and paving. Noise would typically occur during these phases due to the operation of backhoes, and front-end loaders as well as air compressors and hand-held power tools. The nearest residences to be impacted by construction are the single-family homes located adjacent to the project to the north and west. Noise monitoring was conducted as part of a Noise Control Plan during the construction at a similar construction site to determine the noise levels from the associated equipment. A list of the anticipated noise levels for each phase of construction is shown in Table 5, below. In order to reduce project impacts to "less than significant", the following mitigation measure is recommended:

Table 5 – Construction List and Noise Levels

Construction Phase	Distance	Source Level (dBA)	Actual Distance from Property Line (Feet)	Noise Reduction from distance (dBA)	Resultant Noise Level (dBA)
Site Grading	50 Feet	75.7	80	-4.1	71.6
Building Construction		68.2	50	--	68.2
Architectural Coating		62.3	50	--	62.3
Paving Equipment		71.6	60	-1.6	70.0

MM-Noise-2. The City of El Cajon does not have a specific noise threshold for construction activities. At this time, no construction is anticipated between the hours of 7:00 p.m. and 7:00 a.m. Therefore, no noise impacts are anticipated. Additionally, to achieve compliance with the City's noise ordinance for construction within 500 feet of off-site residential lot, the following should be incorporated in the project's construction plan, as necessary:

- Equipment and trucks used for the project construction shall use the best the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds).
- Construction contractors shall use "quiet" gasoline-powered compressors or other electric- powered compressors and use electric rather than gasoline or diesel-powered forklifts for small lifting.
- Stationary noise sources, such as temporary generators, shall be located as far from nearby receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible.

b. **Less-than-Significant Impact with Mitigation Incorporated.** The proposed project is a residential use and not anticipated to include any operations that would generate perceptible ground-borne vibration. The project grading and construction activities may result in temporary or periodic increases in the generation of excessive ground borne vibration or ground borne noise levels typically related to construction. During construction activities, ground-borne vibration would, at times, be perceptible at nearby sensitive receptors (residences) but would be below applicable criteria for potential building damage. Implementation of MM-Noise-2 would limit all on-site construction activities to daytime hours, as permitted by the City's Municipal Code. Thus, the impact would be less than significant.

c. **No Impact.** Gillespie Field Airport is located within the City, but is located approximately 3.5 miles north from the project site. Nor are there any private air strips within two miles of the proposed subdivision. The Gillespie Field Land Use Compatibility Plan 2010 indicates that the Project Site is located outside of its protected air space, significant noise contours (60 CNEL) and typical flight paths. Further, the Project Site does not fall within the Airport Review Area, Airport Overflight Notification Area, or any other safety zone. Therefore, the project would result in no impact relative to airport noise hazards. No impact is anticipated and no mitigation measures are required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial 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?	☐	☐	☐	☒

The Project is located in the City of El Cajon, which has an estimated population of 104,619. The average household size in El Cajon is 3 persons per household, and the total number of housing units is approximately 36,871 (California Department of Finance 2023).

a. No Impact. The proposed development is located on a vacant knoll surrounded by existing single-family homes and considered an infill development within a semi-urbanized, residential area. The project consists of a subdivision of 2.45 acres into five residential lots. This density is consistent with the Low-Density General Plan and RS-14 zoning designations and is in conformance with the City's General Plan population projections. As such, it would not induce population growth nor necessitate the construction of new infrastructure. No impacts are anticipated no mitigation is required.

b. No Impact. The Project Site consists of a vacant knoll and therefore would not displace existing housing or people nor necessitate the construction of replacement housing. No impacts are anticipated no mitigation is required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
▪ Fire protection?	☐	☐	☒	☐
▪ Police protection?	☐	☐	☒	☐
▪ Schools?	☐	☐	☒	☐
▪ Parks?	☐	☐	☒	☐
▪ Other public facilities?	☐	☐	☒	☐

Public services within the City of El Cajon are provided by a variety of public and private entities. Heartland Fire & Rescue, fire protection and emergency medical services; San Diego County, library services; Cajon Valley Unified School District, La Mesa- Spring Valley Unified School District, and Grossmont Union High School District provide educational services; Helix Water District/Padre Dam Water District provide water utilities; and the City of El Cajon provides police and sewer services.

a. ▪ **Less Than Significant Impact**. Heartland Fire and Rescue provide fire and emergency medical services for the City of El Cajon and the project site. Heartland Fire and Rescue has four fire stations located across the City. The fire closest station, #6, is approximately one mile to the north. Construction of the Project may result in an incremental increase in the demand for fire protection and emergency

services. The site is already included within the Fire Department service area. No new or upgraded fire protection facilities would be required as a result of establishment of this Project and no physical impacts resulting from construction of new facilities are identified. Therefore, the impact would be considered less than significant.

- **Less Than Significant Impact**. The City of El Cajon has its own police department located at 100 Civic Center Drive in El Cajon. It is located approximately 1.4 miles north of the Project Site. Construction of the Project may result in an incremental increase in the demand for police protection. The site is already included within the police department's service area. No new or upgraded police protection facilities would be required as a result of establishment of this Project and no physical impacts resulting from construction of new facilities are identified. Therefore, the impact would be considered less than significant.

- **Less Than Significant Impact**. The children of El Cajon are served by three school districts: Cajon Valley Unified School District, La Mesa- Spring Valley Unified School District, and Grossmont Union High School District. The Project proposes the creation of five new residential lots. It is anticipated that these additional units will yield 10 new students. Children from these homes will be accommodated into existing schools, and school districts, based on grade level. The Project is consistent with the density limitation of the zone and would not affect existing levels of public services, nor require the construction or expansion of a school facility. Therefore, the impact will be considered less than significant.

- **Less Than Significant Impact**. Given the limited number of new residents generated by the project, construction of the Project will not require new or physically altered park facilities as the number of new homes is consistent with the density limits of the General Plan. Project residents can be accommodated in existing parks that are in close proximity to the site such as Tuttle Park and Renette Parks. Therefore, the impact will be considered less than significant.

- **Less Than Significant Impact**. The project proposes the construction of five new lots. Residential development of this scale would not significantly increase the demand for public services nor would it require the provision of new or expanded public facilities. Further, the City would assess development impact fees with the issuance of building permits to offset any incremental increase is the demand for public services. Therefore, the impact will be considered less than significant.

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

The City of El Cajon General Plan Open Space and Parks Element provides a framework for the maintenance of existing recreational facilities and the development of future facilities. The Open Space and Parks Element identifies the City's priorities of developing recreational facilities and preserving open space and hillsides for recreational uses for its over 106,000 citizens. The City of El Cajon Recreation Department operates 17 parks and recreational facilities throughout the City. The closest recreational facilities to the Project Site are Tuttle Park located approximately 0.4 miles away and Renette Park, approximately 0.7 miles to the north.

a. **No Impact.** The project proposes to subdivide 2.45 acres into five residential lots. Construction of the five homes on the site would introduce approximately 15 new residents to the community. This represents a fractional increase to the City's population. As such, construction of the Project would not create a physical impact on any existing local park or recreational facility nor advance its deterioration. No impact is anticipated and no mitigation measures are required.

b. **No Impact.** Given the few residents generated by the subdivision, this increase City will not necessitate the construction of any new park or recreational facility. With the issuance of building permits the applicant will have to pay the City development impact fees, a portion of which will be designated toward park and recreation facilities and programs. The impacts related to existing recreational facilities or the need for new facilities will not significant. No impact is anticipated and no mitigation measures are required.

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

The proposed Project will subdivide the 2.45-acre site into five single-family lots with access from the Cajon View Drive. Within the project parcel Cajon View Drive is a poorly maintained 16-foot roadway that extends west to South Magnolia Avenue and east to Avocado Avenue. Avocado Avenue has a non-traversable raised concrete median limiting access to right-in/right-out movements to and from Cajon View Drive. Conditions of project approval will require Cajon View Drive be improved to a 24-foot-wide paved roadway.

Avocado Avenue currently, serves as the legal public access to the Project Site. However, as Avocado Avenue is a physically divided roadway, project access is limited to a right-in and right-out-only movement. In addition, Section 17.125.080 of the El Cajon Municipal Code states that any new lot created in the city shall have frontage on a dedicated public street that allows a minimum of 15 feet of usable access. Alternative access may be approved through the PRD, PUD or specific plan. As most of the lots within the proposed subdivision will not have direct access to a public street, SP 2023-0003 has been prepared, as a companion application to TSM 2022-0008, to comply with the Municipal Code requirement and to provide legal access rights to the subdivision via the existing westerly extension of Cajon View Drive. The additional access options are consistent with the El Cajon Municipal Code, does not conflict with any City transportation plan or program and enhances emergency access to the project site. The environmental and traffic impacts associated with the use and improvement of this alternative access has been discussed and evaluated in this document. Any specific project related impacts have been addressed within that section.

As the proposed subdivision would generate additional rate vehicle trips onto Cajon View Drive and Avocado Avenue, a Transportation Impact Assessment was prepared by LOS Engineering Inc., dated September 11, 2023. The report evaluated the intersection operating conditions adjacent to the Project, access and circulation analysis for the Project site, and cumulative traffic conditions within the study area. Based on the San Diego ITE guidelines, a complete roadway analysis is not required because the Project's trip generation is less than either the 1,000 ADT or 100 peak hour trip thresholds or the 500 ADT or 50 peak hour trip thresholds.

a. **Less Than Significant Impact.** The project traffic generation was calculated using SANDAG trip rates from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002. The existing site is vacant. The project is proposed to include five (5) single family dwelling units. The project trip generation is calculated at 50 daily trips, 4 AM peak hour trips (1 inbound and 3 outbound), and 5 PM peak hour trips (3 inbound and 2 outbound) as shown in Table 6, below. Given the few number of proposed lots, the report concludes that the Project will not result in any significant impacts on the surrounding roadway segments or intersections. As there are no bike paths or trails along the adjacent segment of Avocado Avenue or Cajon View Drive, the proposed Project is not expected to substantially increase the walking, biking, or transit demand to a level where it could not be accommodated by existing or planned facilities. This net increase in vehicle trips would be considered a less than significant impact. No mitigation is required.

Table 6 – Project Trip Generation

Proposed							AM				PM	
Land Use	Rate	Size & Units	ADT	%	Split		IN	OUT	%	Split	IN	OUT
Residential - Single Family	10 /DU	5 DU	**50**	8%	0.3	0.7	**1**	**3**	10%	0.7 0.3	**3**	**2**

Source: SANDAG *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region,* April 2002.

DU - Dwelling Unit; ADT-Average Daily Traffic; Split-percent inbound and outbound.

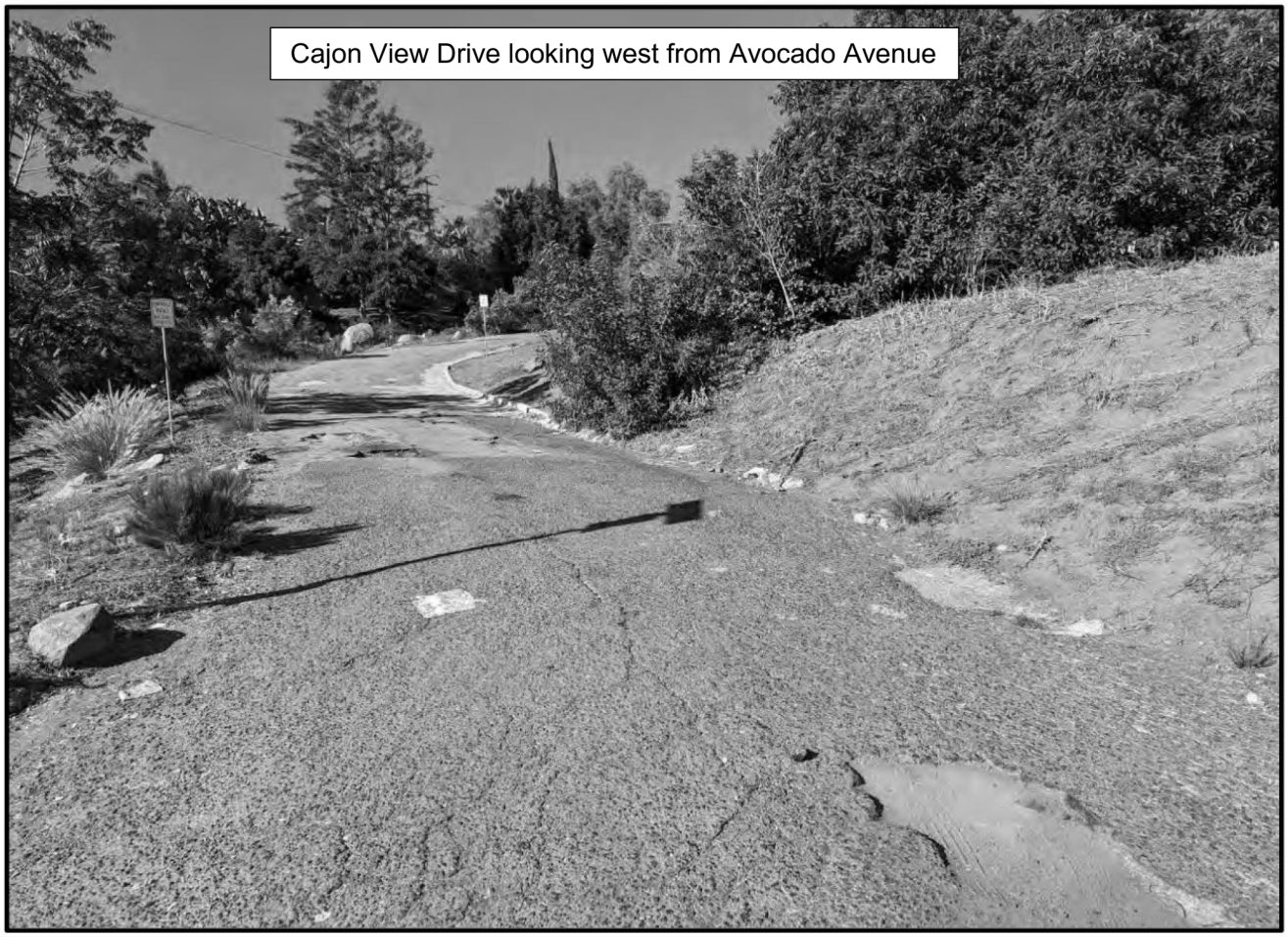
b. **Less Than Significant Impact.** The California Governor's Office of Planning and Research (OPR) has identified Vehicles Miles Traveled (VMT) as the CEQA metric to evaluate a project's potential transportation impacts. Senate Bill 743 (SB 743) shifted the transportation impact measure of effectiveness from Level of Service (LOS) to VMT. As part of the State's CEQA Guidelines, the changes included the elimination of vehicular delay and LOS for determining significant transportation impacts.

OPR outlines the following criteria for determining potential VMT impacts for small projects. In part, it states: "Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

The project, with a calculated trip generation of 50 trips per day, is less than the Office of Planning and Research threshold of 110 trips per day; therefore, according to the Office of Planning and Research Guidelines, the project is presumed to have a less-than-significant VMT traffic impact and VMT mitigation measures are not required.

c. **No Impact.** Access to the proposed subdivision is from Cajon View Drive. A private interior drive will connect to Cajon View Drive providing access to the new single-family lots. A segment of Cajon View Drive, located within the Project Site, will be improved and paved to a 24-foot-wide roadway. Intersection improvements at Avocado Avenue will also be required. The Project has been reviewed for compliance with applicable zones and land uses identified within the General Plan and determined that no off-site roadway improvements are required. The Project, therefore, would not result in a substantial increase in hazards due to a roadway design feature or incompatible uses. No impacts are anticipated and no mitigation is required.

d. **No Impact**. The Project does not involve any roadway or traffic improvements, land use changes or changes to the existing facilities that would result in inadequate emergency access. The improvement of Cajon View Drive (widening and paving) and the interior private road have been designed consistent with City and Fire Department requirements, including those associated with emergency access. The cul-de-sac would be constructed in such a manner as to provide the required turning radius for emergency vehicles. No impacts are anticipated and no mitigation is required.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

AB 52 establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (PRC Section 21084.2). PRC Section 21074 defines tribal cultural resources as follows:

- Sites, features, places, sacred places, and objects with cultural value to descendant communities or cultural landscapes defined in size and scope that are included in or eligible for listing in the California Register of Historical Resources or included in a local register of historical resources.

- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and non-unique archaeological resources, as defined in PRC Section 21083.2, can be tribal cultural resources if they meet the criteria detailed above. The lead agency relies upon substantial evidence to make the determination that a resource qualifies as a tribal cultural resource when it is not already listed in the California Register of Historical Resources or a local register.

a. **i. Less Than Significant Impact With Mitigation.** A cultural resources survey was conducted by BFSA Environmental Services on January 27, 2023 of the Project site. During the survey, 31 prehistoric bedrock milling features, surface artifacts and distinct areas of darker cultural soil were uncovered. In addition to the surface survey, the testing program included the excavation of 16 shovel test pits and one one-square-meter test unit. The testing program recovered pieces of debitage, flake tools, manos, metates and pieces of pottery. Based upon the results of the field survey, testing program, records search, and site significance evaluations, Site SDI-10,237 Locus F was identified as a CEQA-significant Historical Resource. The development footprint for the proposed subdivision will impact the entirety of the intact archaeological deposits and any impacts to the site associated with the development of the property would be considered significant and will require mitigation as a condition of project approval in accordance with CEQA and the City of El Cajon environmental guidelines. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the potentially significant impacts to cultural and historical resources to a less than significant level.

a. **ii**. **Less Than Significant Impact With Mitigation.** Due to the potential for cultural resources located on site and in accordance with Government Codes Sections 65352.3 and 65342.4 and Public Resources Code section 21080.3.1(b), BFSA Environmental, on behalf of the El Cajon City staff, contacted SCIC and the Native American Heritage Commission (NAHC) to request information on the potential cultural significance of the site and a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the project in accordance with AB 52 and SB 18. The NAHC responded indicating the survey was positive and provided a consultation list of 16 tribes. As part of the subdivision review the City of El Cajon, as lead agency, will be responsible for reaching out to the Barona Band of Mission Indians and the Viejas Band of Kumeyaay Indians as directed in the NAHC letter.

Due to the possibility of potentially significant tribal cultural resources, the proposed project would implement MM-CR-2 (see Section V, Cultural Resources) during grading activities. MM-CR-2 would require a Native American Monitor to be present during all grading activities at the project site, in order to minimize disturbance of tribal cultural resources. With the incorporation of MM-CR-2, potential impacts on tribal cultural resources would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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 waste water 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?	☐	☐	☒	☐

The extension of new public utilities will be required to serve the proposed subdivision. This will include water, wastewater, electrical, and solid waste. The Project Site and surrounding area currently receives municipal water from the Helix Water District/Padre Dam Water District. Helix delivers treated water to the cities of La Mesa, Lemon Grove, and El Cajon. The City of El Cajon's wastewater pipeline system interconnects with the City of San Diego's Metropolitan Wastewater Department's wastewater system. The City of San Diego's pipeline terminates at their Point Loma treatment plant where the wastewater is treated and then released offshore into the ocean.

a. **Less Than Significant Impact.** Water, electrical, and solid waste services are available in the adjoining residential parcels located west of the subdivision. An existing City sewer main is located in Avocado Avenue. The project will require an approximate 100-foot extension of existing water service to serve the site and an approximate 300-foot extension of wastewater lines to interconnect to a wastewater main in Avocado Avenue. These services would be extended within the disturbed area of Cajon View Drive. Electrical lines currently pass overhead through the site. Electrical utility and cable lines will be placed underground within the disturbed right-of-way of Cajon View Drive and the new interior road. Based on the above, the five additional residences created by the subdivision would give rise to only a fractional increase in the demand for public services, would not cause a significant environmental impact, and, therefore, would have a less than significant impact on existing facilities.

b. **Less Than Significant Impact.** The Project Site is surrounded by single family residential homes that are served by the Helix Water District/Padre Dam Water District. SB 610 and SB 221 are companion measures that seek to promote collaborative planning between local water suppliers and cities and counties. Both statutes require detailed information regarding water availability to be provided to the city and county decision-makers prior to approval of specified large development projects. Large developments are considered projects creating over 500 new dwelling units. The Helix Water District's 2020 Urban Water Management Plan indicates that it has sufficient water supplies to accommodate existing and future growth for the next 25 years. As such, project impacts for the five new lots are considered less than significant.

c. **Less Than Significant Impact.** The Project Site consists of two parcels. The larger 2.15-acre northern parcel is undeveloped. The southern 0.18-acre parcel has been graded and accommodates a minimally improved segment of Cajon View Drive. A new 24-foot-wide interior paved road, the improved section of Cajon View Drive, and new driveway and impervious surfaces will be created with the five new residential lots. In compliance with the City and State stormwater requirements, a bioretention basin will be constructed on each lot to capture and treat each lot's new drainage waters. To treat new drainage waters originating from the streets and related hard surfaces, three bioretention basins will be constructed on the south side of Cajon View Drive near Avocado Avenue. Construction activities may also result in additional, temporary, stormwater runoff. During operation, existing storm drains and site design features, such as biotreatment areas, would be used. The City will also require the implementation of construction BMPs. Therefore, the proposed project is not anticipated to require the construction of new stormwater drainage facilities or the expansion of existing facilities beyond the scope of the existing project site. As such, stormwater impacts would be less than significant.

d. **Less Than Significant Impact.** The City of El Cajon Public Works Department manages the City's integrated waste management activities. EDCO collects the solid waste, green waste, and recycling for the City of El Cajon. Solid wastes are delivered to the Sycamore Landfill site which has a remaining capacity of over 55 percent of its 71.2 million cubic yard total capacity. In addition, the City of El Cajon has met the California Department of Resources Recycling and Recovery goals by continuing to exceed the State's mandated 50% diversion rate. This, in turn, reduces the overall amount of solid waste deposited in the landfill. Given the limited number of houses associated with the project and compliance with the City's collection and recycling programs, impacts to the integrated waste management system would be considered less than significant.

e. **Less-than-Significant Impact.** The proposed project would comply with the City's Source Reduction and Recycling Element, as required pursuant to the Integrated Waste Management Act, which mandated that all cities reduce waste disposal in landfills from generators within their borders. The City of El Cajon has met the California Department of Resources Recycling and Recovery accomplishment in continuing yearly to exceed the State's mandated 50% diversion rate. Given the limited number of houses associated with the project and its compliance with the City's collection and recycling program, impacts relative to the project's compliance with Federal, State and local regulations regarding solid waste would be considered less than significant.

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

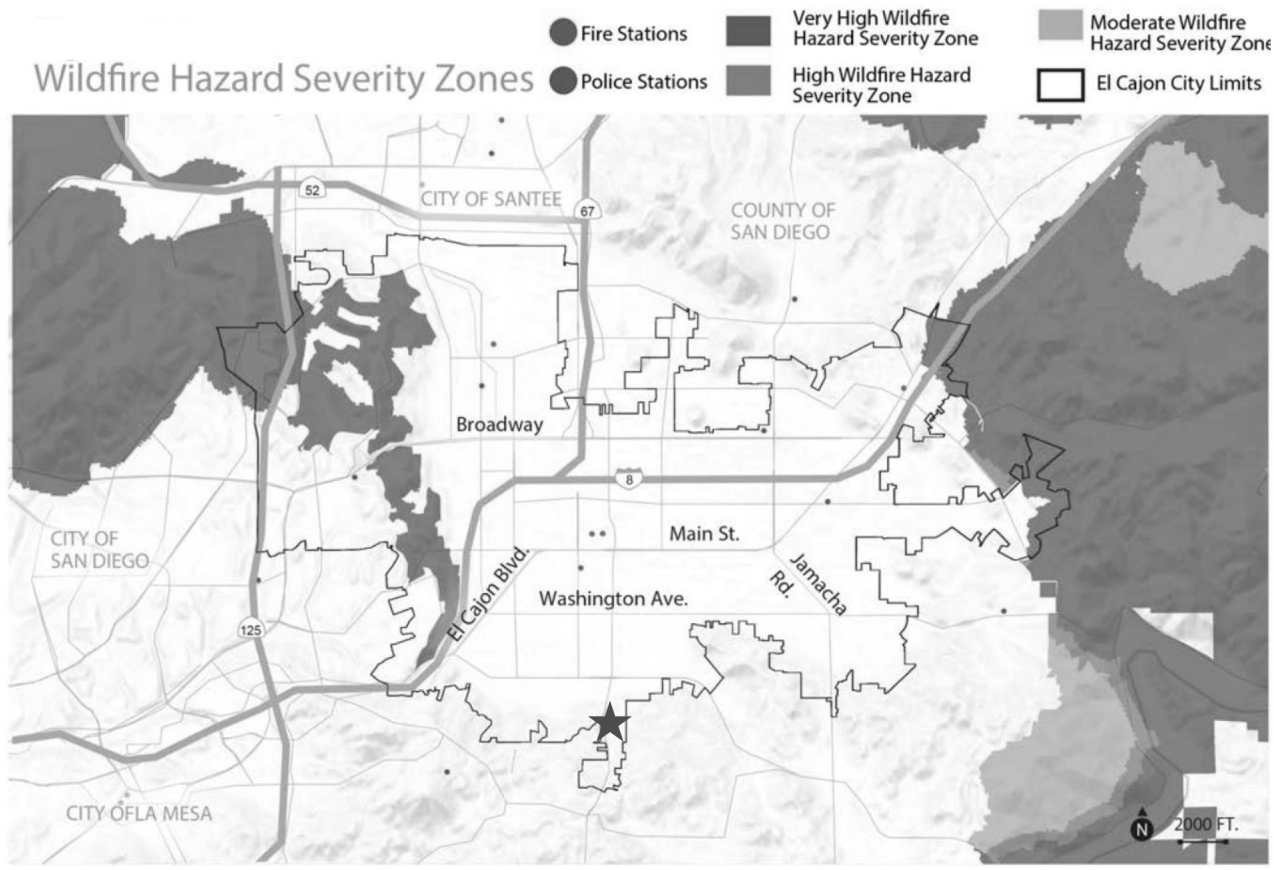
a. **Less Than Significant Impact.** The City of El Cajon has adopted the 2023 County of San Diego Multi-Jurisdictional Hazard Mitigation Plan (Plan). During construction and operation, the proposed project would comply with all applicable measures in the Plan as well as requirements of the Heartland Fire and Rescue Department and the City's General Plan. The City of El Cajon has approved emergency evacuation routes in and out of the City. Interstate 8 provides the primary east–west movement, and State Route 67 provides a northerly route across the San Diego River. Jamacha Road and Avocado Avenue provide southerly routes out of the City. During an emergency County of San Diego Emergency Operations Center and El Cajon Police would facilitate the proper instructions and routes. The Project would be consistent with, and would not impose any conditions that would impair, the emergency access routes. As such, impacts associated with the development of the Project would be considered less than significant.

b. **Less Than Significant Impact.** Since the Project is not located within a Very High Fire Hazard Area, the Project would not result in temporary or ongoing impacts to the environment. The proposed development would use materials and construction methods to address wildfire exposure and to meet other construction standards for development established by the California Building Code (Title 24) and related City of El Cajon requirements. Fire management zones would also be required around each house. Combined these features would reduce the amount of flammable material and the exposure of pollutant concentrations from a wildfire on project occupants. Therefore, any potential impact would be considered less than significant.

c. **Less Than Significant Impact.** Chapter 16.52 Underground Utilities of the El Cajon Municipal Code requires all new development to place all utility services. Undergrounding of all public utilities will be required for this subdivision. The project will also require the improvement to, and maintenance of, Cajon View Drive enhancing a secondary, and emergency access for those living in the proposed development and adjacent subdivisions to the west. 100-foot-wide fire management zones will also be required around each new home. Compliance with the aforementioned improvements will have less than a significant impact on fire risk and temporary or ongoing impacts to the environment.

d. **Less Than Significant Impact.** The proposed subdivision, including the road and building pads will be graded according to City approved grading plans. The new roads and pads must pass soil compaction and on-site stormwater treatment facilities inspections based on City criteria and project-specific conditions. Potential impacts associated with the potential downhill risks of flooding, runoff or drainage changes would be considered less than significant with the implementation of the City required drainage and stormwater improvement plans.

EXISTING CONDITIONS



Source : Cal FIRE. 2020. California Fire Hazard Severity Zone Viewer. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414

Issue	Potentially Significant Impact	Less Than Significant 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?	☐	☒	☐	☐
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?	☐	☒	☐	☐

a. **Less Than Significant Impact with Mitigation Incorporated.** As discussed throughout the above portions of the Initial Study Checklist, the project would have a significant, but mitigable, impact on Biological, Cultural, Noise and Tribal Cultural Resources.

The proposed project could impact up to 0.42 acre of DCSS and 1.02 acres of DBS. Although regulated and considered sensitive, these habitat-types remain relatively well-distributed in San Diego County. Additionally, the habitats present on the project site are at least partially disturbed and isolated in nature. As such, this project's relatively minor impacts to DCSS and DBS (from a regional perspective) are not considered "cumulatively considerable" when viewed in the context of the substantial acreages of these habitat-types persisting in San Diego County. As all impacts to these habitat types will be fully mitigated as identified in MM-BIO 1, BIO 2, and BIO 3, the project impacts will be reduced to below a level of significance.

The project site is located within a large, previously surveyed area of cultural significance known as Site SDI-10,237. Based upon the results of the field survey, testing program, records search, and site significance evaluations conducted on the 2.45-acre project site, Site SDI-10,237 Locus F was identified as a CEQA-significant Historical Resource. The development footprint for the proposed subdivision and associated improvements will impact the entirety of the intact archaeological deposits identified in the studies and potentially those that remain unearthed. Any impacts to the site associated with the development of the property would be considered significant. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the potentially significant impacts to cultural and historical resources to a less than significant level.

Section 17.115.130 C of the City of El Cajon Municipal Code establishes noise performance standards. The City sets limits on the level of noise that may affect residential properties at 60 dBA. Existing and projected noise levels, originating from Avocado Avenue, already exceed the 60 dBA noise level at the proposed new residences. Implementation of MM-Noise-1 and 2 would reduce the potential noise impacts to below a level of significance.

Under Section XVIII, Tribal Cultural Resources, it asks if the project will have a substantial adverse change in the significance of a tribal cultural resource. In accordance with CEQA and the City of El Cajon environmental guidelines the Project site was evaluated for its potential impacts on cultural resources. A summary of the field surveys, testing program, records search, and site significance evaluations, concluded the site contained a significant number of cultural artifacts and that the project site, Site SDI-10,237 Locus F, was identified a significant Historical Resource. The development footprint for the proposed subdivision will impact the entirety of the intact archaeological deposits and any impacts to the site associated with the development of the property would be considered significant and will require mitigation as a condition of project approval. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the potentially significant impacts to cultural and historical resources to a less than significant level. As such, the project would not eliminate any examples of the major periods of California history or prehistory.

b. **Less-than-Significant Impact with Mitigation Incorporated.** A cumulative impact could occur if the project would result in an incrementally considerable contribution to a significant cumulative impact identified from past, present, and reasonably foreseeable future projects for each resource area. Past projects represent the existing condition, while present projects are currently under construction. Future projects have development applications in the process or approved, but no physical construction has yet occurred. The Project Site is located in an infill area with little or no new land available in the immediate vicinity for future development. The closet present project is the 27-lot Magnolia Heights development to the north. When considered together, the project's incremental contribution to the less-than-significant impacts would not be cumulatively considerable. Based on the analysis in the environmental checklist sections above, the project would not result in any significant impacts related to agricultural resources, energy, land use/planning, or mineral resources, population and housing, and recreation nor would it

have any potential to contribute to a significant impact on any resource area. Less-than-significant impacts related to aesthetics, air quality, biological resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation and traffic, tribal cultural resources and utilities and service systems would not add appreciably to impacts of any existing or foreseeable future projects that could result in a significant cumulative impact. Incremental impacts, if any, would be negligible. As such, the proposed project, when combined with future projects, would not result in impacts that would be individually limited, but cumulatively considerable. Therefore, impacts would be less than significant with mitigation measures incorporated into the noted project areas.

c. **Less-than-Significant Impact with Mitigation Incorporated.** As demonstrated in the analysis in this document, the proposed project would not have any substantial adverse effects on the environment, including human beings, either directly or indirectly. Although there are potentially significant impacts identified in this report, mitigation measures would be required to reduce these impacts to less-than-significant levels. Furthermore, there would be no cumulative impacts associated with the project. As such, the effects on human beings as a result of the proposed project would be less than significant with mitigation measures incorporated.

4.0 SUMMARY OF APPLICABLE MITIGATION MEASURES

Per Section 21081.6 of the Public Resources Code a public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other public project, by incorporating the mitigation measures into the plan, policy, regulation, or project design. To ensure compliance and responsibility of each mitigation measure, a Mitigation Monitoring and Reporting Program (MMRP) shall be prepared as a companion document and incorporated into the Mitigated Negative Declaration.

The following are the applicable mitigation measures proposed for the project:

BIOLOGICAL RESOURCES

MM-BIO-1. Impacts to CSS generally require mitigation at a ratio between 1:1 and 3:1, based primarily on the quality of the vegetation/habitat. That is, for every acre-unit of CSS being impacted, between one and three acre-units of equal or higher value CSS (or other higher-value habitat) must be conserved. This can take place either onsite or offsite in an approved location. The subject project will impact slightly less than one-half acre (0.42 acre) of DCSS. Based on the quality of the DCSS and patch size of the vegetation, it is recommended that a 2:1 mitigation ratio be applied. Therefore, at least 0.84 acre of CSS mitigation should apply. Furthermore, “take” authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 0.84 acre of CSS or higher-value Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

MM-BIO-2. Impacts to DBS are generally evaluated as being equivalent to impacts to CSS. That is, they require a similar mitigation approach. The subject project will impact approximately 1.02 acre of DBS. Due to the very heavily disturbed nature of the DBS on the subject site, it is recommended that the impacts to this habitat be mitigated at a 1:1 ratio. In other words, for every acre-unit of DBS impacted, one acre-unit of equal or higher value scrub habitat (or other higher-value habitat) must be conserved. Therefore, at least 1.02 acre of DBS mitigation should apply. Furthermore, “take” authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 1.02 DBS (or CSS or higher- value) Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

MM-BIO-3. Site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird or raptor nesting location (including ground-nesting location) should not take place during the spring/summer songbird breeding season, defined as from 1 January (for nesting raptors) to 31 August of each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prevents the “take” of eggs, nests, feathers, or other parts of most native bird species, and the Endangered Species Act. Limiting development activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 500 feet of the proposed activity will be required. The results of the survey will be provided in a report to the City’s Planning Division for concurrence with the conclusions and recommendations.

Impacts to RV and DDH do not require mitigation. Impacts to these habitat-types are less than significant. No other biological mitigation associated with the proposed project is recommended at this time.

CULTURAL RESOURCES

Archaeological Data Recovery Program

The purpose of an Archaeological Data Recovery Program (ADRP) is to recover sufficient important archaeological information from a site to exhaust the resource's research potential, and thereby mitigate project-related adverse impacts. This approach to the mitigation of cultural resources involves additional archaeological excavations, analysis, and reporting for the portion of the site that will be impacted using a lead agency-approved data recovery plan that is informed by the results of the site testing excavation data. An ADRP can achieve mitigation by exhausting the site's research potential through excavation of a statistically valid sample of the cultural deposit. The following mitigation measures are recommended as a condition of project approval.

MM-CUL-1. Data Recovery Mitigation Program

Prior to granting a grading permit, the applicant shall retain a qualified archaeologist to complete the data recovery program. The archaeologist shall complete the following:

a. Research Design:

The project archaeologist shall prepare and submit a detailed research design to the City to properly guide the data recovery process. This research design will present the appropriate research topics that can be advanced information from this site. The research design will also provide the sampling strategy to accomplish the recovery of sufficient data to achieve the advancement of research questions and exhaust the research potential of the site. The research design shall consider the Native American perspective and issues related to the presence of human remains and ceremonial objects. The sampling strategy envisioned for this project will include a phased approach consisting of an initial unbiased index of the site using a 1.50 percent sample. Phase 2 of the data recovery excavation would focus subsequent excavations at locations where data potential is highest, based upon Phase 1 results, and excavated in a grid pattern. If required a Phase 3, excavated in blocks of units, may be necessary based on the findings of the two previous phases. The research design will present all field and laboratory procedures and protocols, notably the process to be followed when human remains are discovered. Curation of artifacts and repatriation of human remains should also be discussed in the research design as human remains have been identified at multiple Site SDI-10,237 loci.

2. Data Recovery Program:

Upon city review and acceptance of the research design, the field excavation should proceed. All field excavations should include a Kumeyaay Native American representative. The sample size to be excavated in the Phase 1 indexing of Site SDI-10,237 Locus F shall consist of a 1.50 percent sample of the subsurface deposit, or approximately 19 one-square-meter data recovery units split between the two concentrations of intact archaeological deposits. All sample units will measure one-square meter and will be excavated according to standard archaeological protocols. All soil from the units will be screened through one-eighth-inch mesh screens. Water screening of dense deposits or areas of human remains will be conducted as appropriate. Analysis of the Phase 1 excavation results will narrow the focus of the Phase 2 excavations to those areas, if any, where research potential is considered high. The size of the Phase 2 sample, or any subsequent phases, is dependent upon the size of the area delineated as retaining significant research potential and, therefore, it will be at the discretion of the project archaeologist to determine the size and scope of the Phase 2 or Phase 3 sample. Should additional phases be necessary the ultimate goal is a cumulative 2.00 to 5.00 sample of significant archaeological deposits. Upon conclusion of the field excavations, the project archaeologist shall provide a letter to the City to release the grading permit. The final report for the data recovery program will be completed following the grading of the property and shall be submitted as a condition of the release of occupancy permits for the new residences. All artifacts collected from the site will be processed and cataloged in accordance with standard archaeological protocols. Special studies, including radiocarbon dating, obsidian sourcing and hydration analysis, seasonality study, focused study, and ceramic analysis, shall be included in the laboratory process. All artifacts shall be prepared for permanent curation at the SDAC.

3. **Controlled Grading of Site SDI-10,237 Locus F**
   Following completion of the archaeological excavations, the project archaeologist shall direct the controlled grading of the cultural deposit at the initiation of the grading of the property. The controlled grading will require the use of shallow cuts made into the cultural deposit to reveal any dense cultural deposits, features, or human burials. Additional archaeological excavation units may be needed to expand the data recovery sample and mitigate impacts to significant features encountered. All cultural soil from this property shall remain on-site and be incorporated into the graded pads. This requirement is appropriate to retain any fragments of human remains that could not be recovered within the same general provenience as left by their ancestors. Upon completion of the controlled grading of Site SDI-10,237 Locus F, the remainder of the grading of the project will be monitored following the procedures outlined in Section 4.3.

MM-CUL-2. Mitigation Monitoring and Reporting Program
Resulting from the City's circulation notification to the native American Tribes identified by the NAHC, the Barona Band of Mission Indians requests to be consulted during grading monitoring and data recovery program development. The Barona Band further requests, as proposed by MM-CUL-1 and MM-CUL-2, that a qualified archaeologist and native American monitor be present during earth disturbing activities. Further, the Barona Band requests to be notified of inadvertent discoveries during earth-disturbing activities

In addition to the required mitigation of impacts to SDI-10,237 Locus F, as a condition of project approval and prior to the initiation of grading, the project applicant shall retain Native American (Kumeyaay) and archaeological monitors to be present during grading for all on- and off-site ground disturbance. Typical monitoring requirements include the following:

- Implement a grading monitoring and data recovery program to mitigate potential impacts to undiscovered buried archaeological resources on the proposed project to the satisfaction of the City of El Cajon. This program shall include, but shall not be limited to, the following actions:

  B. Provide evidence to the City of El Cajon that a qualified archaeologist has been contracted to implement a grading monitoring and data recovery program to the satisfaction of the lead agency. A letter from the principal investigator (PI) shall be submitted to the lead agency and shall include the following guidelines:

     (1) The project archaeologist shall contract with a Native American (Kumeyaay) monitor to be involved with the grading monitoring program.
     (2) The qualified archaeologist and Native American (Kumeyaay) monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
     (3) The project archaeologist shall monitor all areas identified for development, including off-site improvements. Any inadvertent discoveries of artifacts or exposure of cultural soil shall be considered potential impacts and subsequently mitigated following consultation with the City of El Cajon and the Native American monitors.
     (4) An adequate number of archaeological and Native American (Kumeyaay) monitors shall be present to ensure that all on- and off-site earthmoving activities are observed and shall be on-site during all grading activities for areas to be monitored.
     (5) An attempt shall be made to relocate any impacted BMFs to an open-space or unimpacted area of the project.
     (6) A qualified archaeologist and a Kumeyaay Native American representative shall monitor the grading and excavation of all soil until geological formational soil horizons are encountered. The reduction in archaeological and Native American monitoring must be reviewed and approved by the City of El Cajon. The Native American representative must concur with the reduction of monitoring. Inspections will vary based upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the project archaeologist in consultation with the Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the PI.

(7) Isolates and clearly nonsignificant deposits shall be minimally documented in the field and the monitored grading can proceed.
(8) In the event that previously unidentified, potentially significant cultural resources are discovered, the archaeological monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The PI shall contact the lead agency at the time of discovery. The PI, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the PI and approved by the lead agency, then carried out using professional archaeological methods.
(9) If any human remains are discovered, the PI shall contact the San Diego County Medical Examiner's Office. In the event that the remains are determined to be of Native American origin, the MLD, as identified by the NAHC, shall be contacted by the PI in order to determine proper treatment and disposition of the remains.
(10) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The PI shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
(11) All cultural material collected during the monitoring program, as well as all artifacts recovered during the site evaluation phase of work, shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, thereby being professionally curated and made available to other archaeologists/researchers for further study. Alternatively, prehistoric materials collected during the site evaluation and monitoring programs may be curated at a tribal curation facility that meets federal standards per 36 CFR Part 79 or be repatriated to a culturally affiliated tribe. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.
(12) Monthly status reports shall be submitted to the lead agency starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during this period and the status of progress on the overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.
(13) In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report shall include DPR Primary and Archaeological Site Forms.
(14) In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the lead agency by the consulting archaeologist stating that the grading monitoring activities have been completed.

Alternative Mitigation Measures

If feasible, alternative mitigation measures that incorporate both data recovery and preservation may be acceptable. For example, depending upon the structural needs of the future development, structures that will be built within the recorded boundaries of the intact prehistoric midden deposit may be supported by caissons and aboveground, load-bearing beams, which limits disturbance to cultural deposits. Impacts associated with the locations of the caissons that must penetrate through the midden deposit are mitigated through the implementation of a data recovery program on a smaller scale. This can also be achieved through the use of stem wall structures limiting impacts to only the location of the stem walls and associated utilities. Conversely, the project could be redesigned to necessitate data recovery within one location of intact significant archaeological deposit while the other is preserved within open-space.

NOISE

MM-Noise-1. The modeling results for the Buildout analysis are quantitatively shown in Figure 8 for the private rear yards. Based upon these findings, exterior noise from vehicular traffic along Avocado Avenue were determined to be above the City's 60 dBA CNEL threshold for single-family residences without mitigation. Noise mitigation in the form of 6-foot barriers located at the top of pads of Lots 1 through 4 would be necessary to comply with the City of El Cajon Noise standards for single-family residences based on transportation related noise as shown in Figure 5-B.

- Noise barriers, or sound walls, must be constructed on the back, or rear yard elevations on Lots 1, 2, 3, and 4.
- Each wall must be six (6) feet high)
- The noise barriers must be constructed of a non-gapping material consisting of masonry, wood, plastic, fiberglass, glass, vinyl, steel, or a combination of those materials, with no cracks or gaps through or below the enclosure walls. Barrier wall construction will be subject to the approval of the El Cajon Building and Planning Departments.

MM-Noise-2. The City of El Cajon does not have a specific noise threshold for construction activities. At this time, no construction is anticipated between the hours of 7:00 p.m. and 7:00 a.m. Therefore, no noise impacts are anticipated. Additionally, to achieve compliance with the City's noise ordinance for construction within 500 feet of off-site residential lot, the following should be incorporated in the project's construction plan, as necessary.

- Equipment and trucks used for the project construction shall use the best the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds).
- Construction contractors shall use "quiet" gasoline-powered compressors or other electric- powered compressors and use electric rather than gasoline or diesel-powered forklifts for small lifting.
- Stationary noise sources, such as temporary generators, shall be located as far from nearby receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible.

5.0 REFERENCE DOCUMENTS

Study	Company	Date
Air Quality Assessment	Ldn Consulting	October 12, 2023
Biology Letter Report	Vince Scheidt, Biological Consultant	November, 2023
Cultural Resources Study	Brian F. Smith and Associates, Inc.	May 17, 2023
Drainage Study	Walsh Engineering & Surveying, Inc.	July 5, 2023
Greenhouse Gas Assessment	Ldn Consulting	October 12, 2023
Geotechnical Study	Advanced Geotechnical Solutions	August 21, 2023
Noise Study	Ldn Consulting	October 12, 2023
Specific Plan Design	Walsh Engineering & Surveying, Inc	November 29, 2022
Stormwater Management Plan	Walsh Engineering & Surveying, Inc.	July 6, 2023
Tentative Subdivision Map	Walsh Engineering & Surveying, Inc.	December 29, 2023
Transportation Impact Analysis	LOS Engineering, Inc.	September 11, 2023

City of El Cajon
- General Plan
- Municipal Code
- Safety Element
- Multi-jurisdictional Hazard Mitigation Plan
- Gillespie Field and Montgomery Field Airport Land Use Compatibility Plans
- Historic Preservation Inventory
- General Plan Land Use Map
- General Plan – Zoning Consistency Chart

California Department of Conservation - Important Farmland Finder.
California Department of Forestry and Fire Protection (CAL FIRE)
California Department of Transportation
California Department of Toxic Substances Control
California State Scenic Highway System Map
EnviroStar Mapping database
Heartland Fire and Rescue Department
Helix Water District
Padre Dam Water District
School Districts
- Cajon Valley Unified School District
- Grossmont Union High School District
- La Mesa- Spring Valley Unified School District

6.0 ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM	Asbestos-Containing Material
asml	Above Mean Sea Level
ADT	Average Daily Trips
APE	Area Of Potential Effect
APN	Assessor's Parcel Number
ARB	California Air Resources Board
Basin Plan	Water Quality Control Plan
BMR	Bedrock Milling Feature
BMP	Best Management Practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CALFIRE	California Department of Forestry and Fire Protection
Cal OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CBC	California Building Code
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CFS	Cubic Feet Per Second
CH_4	Methane
City	City of El Cajon
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_{2e}	Carbon Dioxide Equivalent
COHP	California Office of Historic Preservation
CUP	conditional use permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
cy	Cubic Yard
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
General Plan	City of El Cajon General Plan
GHG	Greenhouse gas
GPS	Global Positioning System
GWP	Global Warming Potential
HOA	Homeowners' Association
HU	Hydrologic Unit
I	Interstate
In/S	Inches Per Second
IRWMP	Integrated Regional Water Management Plan
IS/EIS	Initial Study
LOS	Level Of Service

MBTA	Migratory Bird Treaty Act
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	Metric Ton
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEHRP	National Earthquake Hazards Reduction Program
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
PM	Particulate Matter
PM_{10}	Particulate Matter Less Than 10 Microns
$PM_{2.5}$	Particulate Matter Less Than 2.5 Microns
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
PPV	peak particle velocity
PRC	Public Resources Code
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCIC	South Coast Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SMARA	Surface Mining and Reclamation Act of 1975
SO_X	Sulfur Oxide
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USC	United States Code
USGS	U.S. Geological Survey
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity
VMT	Vehicle Miles Traveled
VHFHMZ	Very High Fire Hazardous Management Zone

APPENDIX A - F

ARE AVAILABLE FROM THE CITY OF EL CAJON COMMUNITY DEVELOPMENT DEPARTMENT