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October 25, 2024

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

1. Title; Project Number(s); Environmental Log Number:

   Riverford Road Roundabouts Project; 1023987

2. CEQA Lead Agency name and address:
   County of San Diego, Department of Public Works
   5510 Overland Avenue, Suite 410, MS-O332
   San Diego, CA 92123-1239

   CEQA Responsible Agency name and address:
   California Department of Transportation, District 11, Branch C
   4050 Taylor Street
   San Diego, CA 92110

3. Contact:
   Lead Agency: Jeff Kashak, Environmental Planning Manager
   Phone number: (858) 288-5740
   E-mail: Jeff.Kashak@sdcounty.ca.gov

   Responsible Agency: Koji Tsunoda, Senior Environmental Scientist and Environmental Analysis Branch C Chief
   Phone number: (619) 930-6534
   E-mail: Koji.Tsunoda@dot.ca.gov

4. Project location:

   The Riverford Road Roundabouts Project is located at the State Route 67 (SR-67) Interchange with Riverford Road and Woodside Avenue, within the unincorporated community of Lakeside, in San Diego County. Project limits are: North Woodside Avenue to the north, Woodside Avenue to the south, and SR-67 northbound and southbound on- and off- ramps to the west and east. The project is between Postmile R3.70 and R4.2.

5. Project Applicant name and address:

County of San Diego, Department of Public Works
5510 Overland Avenue, Suite 410, MS O-332
San Diego, CA 92123-1295

6. General Plan

Community Plan:	Lakeside
Land Use Designations:	Public/Semi-Public Facilities (P/SP) General Commercial Specific Plan Area – Lakeside Upper San Diego River Improvement Project Final Programmatic Environmental Impact Report Semi-Rural Residential (SR-1)

7. Zoning Use Regulations: S94 – Transportation and Utility Corridor
S88 – Specific Plan
C36 – General Commercial
RR – Rural Residential

8. Description of project:

The County of San Diego (County) Department of Public Works (DPW) proposes the Riverford Road Roundabouts Project (proposed project or project) to construct roundabouts at two intersections in the unincorporated community of Lakeside in eastern San Diego County. The northern intersection is located at the on- and off-ramps of State Route 67 (SR-67) and Riverford Road, and the southern intersection is located at the Riverford Road and Woodside Avenue intersection (between Postmiles R3.7 and R4.2). This SR-67 interchange (project site) serves as part of a regional access route, connecting the cities of Santee and El Cajon and serving as a gateway to the unincorporated community of Lakeside. Both intersections currently experience traffic congestion with vehicle queues at the SR-67 ramps. Installation of roundabouts would improve the overall traffic efficiency, circulation, and ease congestion.

Both roundabouts would be designed and built in accordance with the U.S. Department of Transportation's *National Cooperative Highway Research Program Report 672 Roundabouts: An Informational Guide, Second Edition* for roundabout design. Vehicles entering each roundabout would yield to vehicles already within the roundabout at each entry point. Entering vehicles would merge in a counterclockwise flow of traffic. Roundabouts' design would include raised medians and curves to slow the traffic prior to entering the roundabouts. No changes to the posted speed limits are proposed.

The northern roundabout would replace a two-way stop-controlled intersection at the on-/off- ramps of SR-67 southbound and Riverford Road intersection ("northern roundabout"). This roundabout's vehicle flows would come from four directions: Riverford Road northbound and southbound, and the SR-67 southbound on- and off- ramps. To accommodate the roundabout footprint, the intersection would be widened. The roundabout would be approximately 185 feet in diameter, with lanes ranging from approximately 12 to 21 feet wide. The on- and off- ramps to/from SR-67 southbound would be widened and realigned to meet the current California Department of Transportation (Caltrans) standards. The existing North Woodside Avenue connection to

Riverford Road would be relocated via construction of a new leg that will connect and convey existing traffic flow in and out of the northern roundabout.

The southern roundabout would replace the existing three-way signal-controlled intersection at Woodside Avenue and Riverford Road ("southern roundabout") and is located just east of the SR-67 northbound off-ramp. The southern roundabout's traffic flows would come from three directions: Riverford Road northbound and Woodside Avenue westbound and eastbound. To accommodate the southern roundabout's footprint, the intersection would be widened and its elevation lowered to meet existing elevation of Riverford Road. The roundabout would be approximately 163 feet in diameter, with lanes ranging from approximately 12 to 21 feet wide. The existing northbound SR-67 off-ramp connection to Woodside Ave would be relocated via construction of a new leg that will connect and convey exiting traffic flow into the southern roundabout.

The proposed project would also construct Class II bicycle lanes, sidewalks, crosswalks, and shared-use pathways (for pedestrians and bicyclists) to create a "complete street [1]" and multimodal connectivity. Necessary crosswalks and ramps, compliant with the Americans with Disabilities Act, would be built and delineated by pavement markings at the entry and exit points of each roundabout, allowing users to safely cross the roadways. Rapid Flashing Beacons (RFBs) would be installed at multiple crosswalks (southbound SR-67 off-ramp and northbound SR-67 off-ramp). Pedestrian push buttons would be installed on each side of these crosswalks to activate the RFBs. Pedestrian sidewalk (eight feet wide) would be built west of the Woodside Avenue/Riverford Road intersection, alongside a bicycle lane.

Shared-use (also referred to as multi-use) pathways (10 feet wide each) would be constructed around both roundabouts – on North Woodside Avenue and at Woodside Avenue/Riverford Road intersection. The shared-use pathways would allow users to travel along and between Woodside Avenue, Riverford Road, and North Woodside Avenue and across the roundabouts. A multi-use pathway on the eastern side of Riverford Road would be constructed to connect to an existing sidewalk that begins on the bridge across the San Diego River. A segment of an existing Class II bicycle lane on Woodside Avenue would be slightly realigned north and merge with the proposed multi-use pathway on Woodside Avenue to provide continuity for pedestrians and bicyclists.

Both roundabouts would be made of cast-in-place concrete, and the center of each roundabout would be either landscaped, hardscaped or a combination thereof. The center of each roundabout would be raised, to minimize headlight glare for traveling vehicles. Curbs would be constructed around the perimeter of each roundabout to convey stormwater, help create a circular flow of traffic, and for pedestrians' safety. Truck aprons would be constructed to accommodate truck movements. Curbs would be placed around the medians at the approach to each roundabout, edges of sidewalks, edges of truck aprons, and edges of raised medians. Stormwater drainage facilities (e.g., vegetated and/or concrete swales) and water quality treatment/improvement features (e.g., biofiltration basins) would be constructed to capture and treat roadway stormwater,

[1] Complete Streets are streets designed and operated to enable safe use and support mobility of all users. It includes people of all ages and abilities, regardless of whether they are drivers, pedestrians, bicyclists, or public transportation riders (U.S. Department of Transportation, Complete Streets homepage, 2015).

ultimately connecting to the existing drainage system. Drainage facilities and water quality improvement features would be located at the toes of slopes and/or at low points between multiple slopes. They would vary in size and may include mulch, vegetation/plantings, and permeable landscape. New curb cuts, gutters, storm drain inlets, ditches, headwalls, channels, and sidewalk underdrains would be added and tie into the existing drainage systems to convey stormwater to the proposed water quality treatment features. Existing drainage patterns, including current outlets to the San Diego River, would be maintained. Dirt slopes underneath existing bridge overpasses would be stabilized (e.g., paved or cobble stones in mortar bed), and the project would add multiple streetlights to help illuminate both roundabouts for drivers' safety. Riverford Road between both intersections would be widened to accommodate the shared-use pathways and stormwater drainage facilities.

Retaining walls would be constructed where grading cannot be achieved due to the right-of-way restrictions, existing roadways, or steep highway embankment slopes. Retaining walls would range in height from 3.5 feet to 25 feet, depending on location, with the latter proposed on the south side of Woodside Avenue, against the hill.

Construction of the proposed improvements would be phased over approximately one to two years, with the potential for full but temporary closure of both project intersections. If construction duration is approximately one year, this would likely involve complete roadway closures to expedite construction at both intersections as well as nighttime work. If construction duration is approximately two years, this would likely involve nighttime closures at both intersections and limited complete roadway closures. Traffic detours would be in place as-needed and would utilize the adjacent Winter Gardens Blvd./SR-67 interchange, Channel Road, and Riverside Drive.

Rock removal via blasting and/or other rock fracturing methods is anticipated; however, access to adjacent residences and businesses in the vicinity of the project, as well as for emergency vehicles, would be maintained at all times. Temporary loss of parking spaces within the Park & Ride lot on Woodside Avenue may occur for approximately six months. Finally, relocation of public utilities is anticipated and may include water lines, electrical, gas, and/or telecommunication lines.

Standard construction Best Management Practices, including fencing of Environmentally Sensitive Areas, dust suppression, erosion and sediment control (e.g., straw waddles, silt fencing, gravel bags, fiber rolls, hydromulch, and hydroseeding for slope stabilization), inlet protection, noise attenuation measures, trash containment, and a Stormwater Pollution Prevention Plan would be implemented during and after construction.

The project would be constructed largely within the existing County's and Caltrans' right-of-way, with slight encroachment onto the City of Santee's right-of-way, in the southwestern corner of the project. In addition, multiple property acquisitions are anticipated to facilitate project design and construction needs. Caltrans is a CEQA Responsible Agency for this project because they are a public agency who is also responsible for approving and possibly constructing this project (this project is partially located within the Caltrans' right-of-way).

9. Surrounding land uses and setting:

Lands surrounding the project site include commercial, public transportation facilities and rural residential land uses. The landscape of the project site and adjacent land consists of developed and disturbed roadways and areas, vegetated land, and hilly topography. The surrounding environment consists of: roadways, a highway with associated medians and embankments, disturbed land, ornamental vegetation, open space, commercial development, and residential development.

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

Permit Type/Action	**Agency**
1602 – Streambed Alteration Agreement	California Department of Fish and Wildlife
General Construction Storm Water Permit	San Diego Regional Water Quality Control Board
Encroachment, grading and excavation permit (if Caltrans constructs the project)	County of San Diego

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

YES ☒ NO ☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

Pursuant to Assembly Bill 52 (AB-52) and results from a Sacred Lands File Request, pursuant to Public Resources Code §5097.94(a), consultation was conducted with cultural affiliated tribes pursuant to Public Resources Code §21080.3.1 and 21084.3(c). County DPW distributed consultation letters on November 22, 2023, followed up with e-mails on December 7, 2023, and followed up again with e-mails and telephone calls on January 8 and 9, 2024. Three tribes requested AB-52/Sacred Lands consultation: Jamul Indian Village (Jamul), Campo Band of Mission Indians (Campo), and La Posta Band of Mission Indians/Grey Wolf (La Posta/Grey Wolf). Consultation meetings were held and concluded with Jamul and Campo in January 2024. La Posta/Grey Wolf did not respond to any of the County's follow-up correspondence. Additional meetings were conducted in January - February 2024 with: San Pasqual Band of Mission Indians and Sycuan Band of Kumeyaay Nation. For further information on tribal consultation, please refer to Section XVIII (Tribal Cultural Resources). As of the date of this Initial Study, tribal consultations have concluded.

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

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

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

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

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

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

Jeff Kashak — Signature

10/25/24 — Date

Jeff Kashak — Printed Name

Environmental Planning Manager — Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

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

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

Discussion/Explanation:

The County Guidelines for Determining Significance, Report Format and Content Requirements for Visual Resources establish significance thresholds for effects on a scenic vista. As stated in the County guidelines, a significant scenic vista impact would occur if the project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from a public road, a trail within an adopted County or State trail system, a scenic vista or highway, or a recreational area. Scenic vistas from public roads include views with scenic vistas, and roads within the County Scenic Highway and State Scenic Highway systems. Recreational areas may include local, regional, state, and federal lands.

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

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

Less Than Significant Impact:

Site Setting and Project Components
The project consists of improvements to existing public transportation and pedestrian facilities within the SR-67/Riverford Road interchange, and the project site is surrounded by highway/roadway facilities, commercial, and residential land uses that do not contribute to a scenic vista. Existing developments adjacent to the project site include a recreation vehicle (RV) dealership to the west; residential homes to the southwest; A-1 Self Storage, Oceanic Kenya Shipping, and San Diego River to the north; a vegetated hill to the south; and SR-67, Woodside Avenue, and an RV storage yard to the east.

The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

The proposed project is adjacent to a County-designated scenic highway SR-67 (County General Plan, Conservation and Open Space Element). A scenic highway consists of scenic corridors and/or scenic resources located generally adjacent to and/or visible from a vehicular horizon (County Visual Resources Guidelines for Determining Significance 2007). In this case, SR-67 is a scenic local highway with a panoramic viewshed and horizons that include rolling hills, boulders, native vegetation, natural terrain, and partial skyline. The dimension of a scenic corridor is usually identified using a motorist's line of vision and the extent of views of distant horizons.

A site visit was conducted by the County's landscape architectural consultant RE Services on January 17, 2024, and a *Visual Resources Impact Assessment Memorandum* dated June 25, 2024 was prepared by RE Services. As analyzed in the memo, the project would be compatible with the existing visual environment in terms of visual character and quality, and therefore would not cause an adverse impact on this scenic portion of SR-67 highway. As discussed in the memo and summarized below, proposed project components would be designed consistent with the community character and visual quality of the existing public transportation facility, commercial, and residential uses of the surrounding area. The following analysis summary demonstrates why the project would not substantially change the composition of an SR-67 scenic vista or adversely alter visual quality or character of its viewshed.

Viewer Groups

According to the County's Guidelines for Determining Significance, Section 1.3, Visual Character: "a viewer observes the visual environment as a whole, not one object at a time. An individual's perception of a view and his/her enjoyment of a view can vary by individual. The visual experience of the viewer is a combination of the visual resources in the landscape and the viewer's response to what he/she sees" (2007). Therefore, visual perception is subjective, and an observer's viewpoint includes visual processing of the entire visual environment, not necessarily specific visual components. Likewise, classes of viewers differ in their visual response to a project and its setting. Project type, location, proximity to vistas or scenic resources, access to the site, proposed structures and other factors help to identify viewer response and viewer groups. For the proposed project, two viewer groups were analyzed: 1) roadway travelers (those with views from the roadways and the project) and 2) neighbors (those with views of the project). Roadway travelers can be further subdivided into two groups: 1) motorists traveling on SR-67, and 2) motorists, pedestrians and bicyclists traveling on Riverford Road, Woodside Avenue, and North Woodside Avenue. Neighbors include residences and businesses located near the project.

For the first viewer group (motorists traveling on SR-67), whether travelling northbound or southbound on SR-67, existing intersections are not within a direct line-of-sight from the SR-67 because a) SR-67 is approximately 10 feet higher than the southern intersection and approximately 14 feet higher than the northern intersection and b) southern intersection is approximately 40 feet south of SR-67, while the northern intersection is beneath the SR-67 southbound bridge. To see the southern intersection, northbound SR-67 viewers would have to turn their head east and away from the road. The southbound SR-67 drivers have no or very little view of the northern intersection and can only see a small segment of Riverford Road. However, these viewers currently can see the southern intersection but only for several seconds with trees obstructing the view. Therefore, both northbound and southbound viewers' visual access to both roundabouts would be limited and fleeting as they travel on SR-67. Additionally, to accommodate configuration of the southern roundabout, Riverford Road and Woodside

Avenue intersection and adjacent portion of Riverford Road would be lowered by approximately seven feet to meet the current elevation. This would make the southern roundabout lower and less visible than today for motorists traveling northbound on SR-67. The northern roundabout's elevation would remain the same and continue to be outside of direct line-of-sight of the SR-67 southbound motorists, like today. Therefore, no significant visual changes or impact would occur compared to existing conditions.

For other proposed project components (e.g., retaining walls, sidewalks, shared-use pathways, crosswalks, ramp legs, water quality improvement features, storm drainage features), all would remain within the footprint of existing roadway facilities and would be designed consistent with the existing environment, character, and visual quality of the area. Most of these project components would not be within a direct line-of-sight for motorists travelling on SR-67. The proposed retaining walls may be directly or peripherally visible to the SR-67 motorists depending on each wall's location. The walls would range in height from approximately 3.5 feet to 25 feet, depending on location, with the tallest proposed south of Woodside Avenue at the toe of a natural hill/slope. This wall would be visible from the highway; however, viewer exposure to the wall would be brief. To help integrate it with the surrounding topography, aesthetic treatments for the tallest retaining wall (and potentially others) would be selected to minimize any contrast.

For the second viewer group (motorists, pedestrians and bicyclists traveling on Riverford Road, Woodside Avenue, and North Woodside Avenue), both roundabouts and all other proposed improvements would be within the viewer group's direct view. However, all project components would be designed using aesthetic treatments that blend in with the existing natural and built environment of the area and the SR-67 corridor theme. Additionally, this viewer group's exposure to the roundabouts and all project components would be insignificant given the short time and distance it takes to traverse the roundabouts, travel speeds, and the attention to roadway conditions required of drivers to travel safely. For pedestrians and bicyclists, viewshed and project exposure would be more prominent; however, compared to present site conditions, the impact would be positive and visual quality improved. With streetlights and stop signs removed and replaced with curvilinear design (e.g., for roundabouts, shared-use pathways, sidewalks, and retaining walls), with textured and tan-colored surfaces in combination with the added trees, shrubs, grasses, and decorative boulders and rock blankets or cobble paving, pedestrians' and bicyclists' views would moderately improve. As previously mentioned, a retaining wall of up to 25 feet tall is proposed along the south side of Woodside Avenue, however, the wall would not significantly change the rural, natural character of the hillside because the wall's aesthetic treatments (battered wall face, rock-sculpted texture and tan-colored surfaces) would simulate existing earthen cut-slope. Therefore, no adverse impact to this viewer group's view would occur.

Motorists approaching or travelling on North Woodside Avenue would have a direct line-of-sight of the northern roundabout and other project components at this intersection and the changes would be prominent compared to current conditions. However, the visual quality and viewer impact would be positive and similar to that of the pedestrians and bicyclists described above because this motorist group's views would potentially improve as a result of the project. Proposed roundabouts and other project components would incorporate specific aesthetic treatments and features designed with the goal of integrating with the existing built and natural environment of this intersection and the overall SR-67 corridor theme. Therefore, no significant impact to this viewers' vista is anticipated.

The closest residence to the project site is located at 11587 Woodside Avenue, and the southern intersection is within this group's line-of-sight under existing conditions. However, this residence is situated approximately 30 feet higher and approximately 55 feet to the west of the southern intersection and the residential structure is set back south from the edge of the hill by approximately 90 feet. While this residence would be able to see portions of the southern intersection, views of the southern roundabout and project components, including the proposed tallest retaining wall (up to 25 feet in height), would be limited due to the significant setback and property's elevation. Additionally, all project components would be designed with aesthetic treatments to match the surrounding landscape, textures, colors, built environment and SR-67 corridor theme, as explained earlier, and thus, the viewshed from this residence would not be adversely impacted. All other nearby residences are located along Woodside Terrace and are removed from the Riverford Road/Woodside Avenue intersection by approximately 350 feet southwest. Additionally, these properties are higher in elevation and are situated behind the property at 11573 Woodside Terrace and behind each other, which fully obstructs their views of the entire project site (both intersections).

A residence located at 11573 Woodside Terrace faces north and west. Their viewshed includes distant ridgelines and open vista toward the west and the existing northbound SR-67 Woodside Avenue off-ramp light-controlled intersection, which would be eliminated and combined with the proposed SR-67 off-ramp connecting into the southern roundabout. This means, in place of the existing signaled intersection, these residents would now have a view of the proposed southern bioretention basins with trees, shrubs, grasses, and boulder/stone visuals. Therefore, their viewshed would improve from existing conditions. Finally, the RV dealership and businesses west of the southern roundabout currently can only see the existing SR-67 northbound off-ramp and not the southern intersection. Therefore, their vista would either not change or improve, as they would likely also be able to see the proposed southern bioretention basin with vegetation.

Future project coordination between the County and Caltrans District 11 would occur to discuss the details of the project's aesthetic treatments and landscaping, including Caltrans-requested aesthetic recommendations listed in the Appendix C of the project's *Visual Impact Assessment Memorandum* dated June 25, 2024, prepared by RE Services. These details would be addressed in some or all of the following project documents: an amendment to the existing Freeway Maintenance Agreement for the SR-67/Riverford Road interchange, landscape PS&E, Landscape Monitoring Plan, Landscape Maintenance Agreement, technical specifications of the project's contractor bid package, and/or any other applicable contracts/documents that identify project requirements. A key consideration would involve determination of facilities' ownership and maintenance responsibilities. During the project's engineering design phase, County and Caltrans will delineate the limits of each agency's right-of-way, along with maintenance roles and responsibilities.

Summary

Although vegetation removal would be required to construct both roundabouts, sidewalks, shared-use pathways, retaining walls, on-/off- ramp connectors, bioretention basins and other project components, the project site would be revegetated and landscaped with native shrub and tree species, native grasses, rock mulch and rock blankets or cobble paving and decorative boulders. Project treatments would utilize colors, textures, curves, and transitions to blend in with the surroundings, the scenic portion of SR-67 highway, and the SR-67 corridor theme. This would not only improve the existing visual quality and appearance of this transportation facility, but also help integrate with the surrounding native slopes and vegetation of the San Diego River.

In summary, according to the *Visual Impact Assessment Memorandum* dated June 25, 2024, the built project would result in a moderately low beneficial impact[2] to the visual resources (character and quality). Viewer sensitivity would be moderately low. The visual impact would be also considered moderately low. The visual effects of the project would have a moderately low beneficial change to the existing rural suburban character and quality of the Lakeside community. This degree of change to the visual character and environment is due to the introduction of new roundabouts, retaining walls, sidewalks and multi-use pathways, water quality improvement features, and streetscape features (e.g., asphalt paving, curb and gutter, medians, signage, etc.). The project slightly increases the limits of concrete paving through the widening and realignment of both intersections and SR-67 ramps, and due to the pedestrian/bicycle pathways and sidewalks that would improve safety and circulation.

Overall, the project would be compatible with the existing viewsheds and visual environment in terms of character, visual quality, and scenic horizon. While there would be changes to the physical environment, inclusion of aesthetic design treatments, visual design features, and landscaping would help to integrate project components with the surrounding natural and built environment, thus minimizing potential adverse impacts. Ultimately, the project would follow existing topography and improve the visual quality through the addition of landscape, vegetation, soft colors, natural textures, and decorative hardscapes. No obstructions to the existing viewshed of the scenic horizon (from the viewpoint of SR-67 travelers) would be created. No changes are proposed to the nearby businesses, SR-67 overpass bridges, adjacent properties, or other area landmarks. Therefore, no significant impacts to a scenic vista of this segment of SR-67 highway would occur. The visual quality or rural character of the viewshed would not be significantly altered.

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

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

Discussion/Explanation:
The State Scenic Highway System includes a list of highways that are either eligible for designation as State scenic highways or have been officially designated. These highways are identified in Section 263 of the Streets and Highways Code and can be found under the Scenic Highway System List. The California Scenic Highways Program is under the stewardship of the Caltrans. Scenic corridors along these highways consist of land that is visible from, adjacent to, and outside the highway right-of-way, and is comprised primarily of scenic and natural features. Topography, vegetation, and viewing distance may determine the corridor boundaries.

No Impact: Based on a review of the surrounding area, a site visit completed by RE Services staff on January 17, 2024, and the *Visual Impact Assessment Memorandum* dated June 25, 2024, the proposed project is not located near or is visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State scenic highway. According to the California State Scenic Highway System mapping application, the nearest State scenic highway is SR-52 and I-8, located approximately 1.6 miles southwest and

[2] "Moderately low beneficial" refers to the degree of visual changes to community character, quality, and viewer sensitivity. None would be significant, yet all would improve as a result of the proposed project as explained in Section I(a).

3.5 miles south (straight-line distance), respectively, of the project site. Both highways are visually separated from the project site by hilly topography and dense development in between. Therefore, the proposed project would not have any substantial adverse effect on a scenic resource within a state scenic highway. No impact would occur.

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

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

Discussion/Explanation:

Visual character is the objective composition of the visible landscape within a viewshed based on the organization of the pattern elements line, form, color, and texture, and is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers. The visual resources analysis generally involves the identification of visual resources (natural and built) within the visual landscape and the overall evaluation of the quality and character of that landscape. Analysis of a project's impacts to visual resources is based on the identification of the change that would occur when a project proposes to alter the existing visual character and/or visual quality of the environment.

Less Than Significant Impact: The project site is located in an urbanized area in the unincorporated community of Lakeside. Existing visual character and quality of the project site and surrounding area can be characterized as a mixture of public transportation facility, commercial, residential, and developed land uses that do not contribute to a scenic vista. The proposed project would be consistent with the provisions of the goals and policies outlined in Chapter 5 of the County's General Plan specific to development siting and design, which require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features (2011).

The proposed project involves constructing two roundabouts, sidewalks, shared-use pathways for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project would be compatible with the existing visual character and quality of the public views and with the County's General Plan and the Lakeside Community Design Standards for the following reasons:

- project components and features would be constructed within the same general footprint of the existing transportation and pedestrian facilities;
- proposed improvements and aesthetics would not contrast with the existing visual character of the community as the surrounding environment includes highway, roadways, commercial, developed, and disturbed areas;
- various project components would create a visual improvement by adding native vegetation and greenery to a, largely, developed area; and

- proposed project components would be designed to properly integrate with the existing natural and built aesthetics of the area and the SR-67 corridor theme by incorporating area-fitting aesthetic treatments and design features, including wall transitions, landscaping, natural color, textured-finish and much more, as described in Section I (Aesthetics) question (a).

The project would not result in cumulative impacts to visual character or quality because the proposed project, along with the projects listed in Section XXI (Mandatory Findings of Significance) and incorporated by reference herein, would not degrade the existing visual character, quality, corridor theme, or the site's surroundings, and would not result in incompatible changes in visual character or degrade the overall quality of a scenic vista. Therefore, the project would not result in adverse or cumulative level impacts on visual character or quality within the project site or in the surrounding area.

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

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

Discussion/Explanation:

The San Diego County Light Pollution Code includes requirements for outdoor lighting to minimize light pollution to allow citizens of the county to view and enjoy the night environment and to protect the Palomar and Mount Laguna observatories from the detrimental effect that light pollution has on astronomical research. Lighting impacts may also occur due to light trespass onto adjacent properties. Potential glare impacts may result from highly reflective building materials, including but not limited to reflective glass and high-gloss surface color that would create daytime glare.

No Impact: The project consists of improvements to transportation and pedestrian facilities and does not propose the use of building materials with highly reflective properties such as glass or high-gloss surface colors. The project would add nighttime street lighting to help illuminate both roundabouts, but the streetlights would be consistent with the County's Light Pollution Code, point downward, and use low illumination, consistent with standard streetlights. Therefore, the project would not create any new sources of light pollution that could contribute to sky glow, light trespass or glare and adversely affect day or nighttime views in area. No impact would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

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, or other agricultural resources, to non-agricultural use? Convert Farmland of local importance (County of San Diego LARA Model)?

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

Discussion/Explanation:

The County's Guidelines for Determining Significance, Report Format and Content Requirements – Agricultural Resources provide guidance for evaluating environmental effects that a proposed project may have on agricultural resources and provide a threshold for impacts that would be considered significant.

No Impact: The project site includes public infrastructure facilities, commercial and developed lands, and open space. According to the California Important Farmland Finder mapping application of the California Department of Conservation "Farmland Mapping and Monitoring Program", the project site is classified as Urban Built-Up land, occupied by structures such as residential, industrial, commercial, etc. As the project site is mapped in the County's General Plan as a Public/Semi-Public Facility and incompatible with agricultural uses, no agricultural resources, including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance, would be converted to a non-agricultural use. No impact would occur.

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

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

Discussion/Explanation:

No Impact: The project site is zoned S94 (Transportation and Utility Corridor), S88 (Specific Plan), C36 (General Commercial), RR (Rural Residential), and designated Urban Built-Up land, which is not considered to be an agricultural zone. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.

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))?

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

Discussion/Explanation:

No Impact: The project site does not contain any timberland or forest lands, as defined in Public Resources Code section 12220(g), nor does San Diego County have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning and no rezone of the properties proposed for acquisition as part of the project development is proposed or anticipated. Therefore, project implementation would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland production zones. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

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

Discussion/Explanation:

No Impact: The project site does not contain any forest lands, as defined in Public Resources Code section 12220(g), and there are no forest lands near the project; therefore, proposed project's implementation would not result in the loss or conversion of forest land to a non-forest use. No impact would occur.

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?

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

Discussion/Explanation:

No Impact: The project site and surrounding area do not contain any active agricultural operations. As noted in Section II(a) (Agricultural and Forestry Resources), according to the Farmland Mapping and Monitoring Program data of the California Department of Conservation, the site does not contain Prime Farmland, Unique Farmland, Farmland of Statewide or Local Significance. In addition, the project site is an existing transportation facility with developed land surrounding it making it incompatible with agricultural uses. Therefore, the proposed project would not result in a conversion of these lands or active agricultural operations to a non-agricultural use. No impact would occur.

III. AIR QUALITY

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

a) Conflict with or obstruct implementation of the applicable air quality plan?

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

Discussion/Explanation:

The project site is located within the San Diego Air Basin (SDAB). The applicable air quality plans include the Regional Air Quality Strategy (RAQS) for the SDAB and applicable portions of the State Improvement Plan (SIP). The San Diego Air Pollution Control District (SDAPCD) and

the San Diego Association of Governments (SANDAG) are responsible for implementing the RAQS and applicable portions of the SIP.

Nonattainment areas must submit a SIP outlining the combination of local, state, and federal strategies aimed at bringing the area into attainment. The SDAB is currently in nonattainment under the federal criteria for 8-hour ozone. To address this requirement, in 2024, the Environmental Protection Agency (EPA) made two revisions to the SIP to meet Clean Air Act requirements for the 8-hour ozone national ambient air quality standards (NAAQS) and the 8-hour ozone NAAQS for San Diego County. The first SIP revision, "2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County" (Attainment Plan) addresses most of the SIP requirements for the area. The second SIP revision supplements the motor vehicle inspection and maintenance program portion of the 2020 Plan. To address nonattainment, SDAPCD updated its RAQS in 2022 and it is now in effect. The 2022 update also complements regional actions addressing greenhouse gases and climate change. A project's consistency with the RAQS and the Attainment Plan is based on whether the project would exceed the estimated air basin emissions, which are based in part on equipment use assumptions, projections of population, and Vehicle Miles Traveled (VMT). For instance, an increase in VMT beyond projections in such plans could result in a significant adverse incremental effect on a region's ability to attain or maintain ambient air quality standards.

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off- ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

Potential impacts to air quality from the proposed project would come from construction activities. Construction would occur in phases to minimize roadway closures and is anticipated to take approximately one to two years. Construction equipment emissions would be the minimum necessary to complete the improvements and remain temporary and localized. The use of construction equipment in the RAQS and Attainment Plan is estimated for the region on an annual basis and the proposed project would not increase regional assumptions for off-road equipment use. No new emissions would occur as a result of operations of the project as the project would operate similarly to the current conditions (i.e., SR-67/Riverford Road interchange) and within the same footprint. Long-term operational emissions would be limited to infrequent maintenance activities, which would not result in a new emissions source as existing roadway intersections and highway ramps within the project site are already maintained by the County and Caltrans.

The proposed project would not generate new vehicle trips as the project would not increase roadway capacity and is not considered trip-inducing. Additionally, the proposed project would not increase population or employment in the planning area as it does not propose land-use changes or new developments. Therefore, the project would not exceed current assumptions used to develop the RAQS, Attainment Plan, and SIP. Project implementation would not conflict with or obstruct implementation of an applicable air quality plan on a project-based or cumulative level and the impacts would be less than significant.

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

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

Discussion/Explanation:

The EPA classifies air basins (or portions of air basins) as in attainment or non-attainment for criteria air pollutants, which include the following: ozone, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter, lead, and volatile organic compounds (VOC). Ozone is formed when VOCs, nitrogen oxides (NO_x), and reactive organic gases (ROG) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Particulate matter pollution consists of very small liquid and solid particles in the air. Coarse particulate matter (PM_{10}) sources include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources. Fine particulate matter ($PM_{2.5}$) sources include motor vehicles, industrial uses, residential fireplaces, and woodstoves. Ozone is not emitted directly but is a result of atmospheric activity of precursors. NOX and ROG are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone.

According to the SDAPCD[3], San Diego County is presently in non-attainment for the NAAQS 8-hour ozone. San Diego County is also presently in non-attainment for 8-hour and 1-hour ozone, PM_{10}, and $PM_{2.5}$ for California Ambient Air Quality Standards (CAAQS). The project site is designated as either in attainment or unclassifiable/unclassified for all other criteria pollutants under the NAAQS and CAAQS.

Less Than Significant Impact: Construction of the proposed project would result in the temporary generation of VOCs, NO_X, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions associated with construction equipment, construction vehicles, soil excavation, and material transport. Fugitive dust emissions would be primarily associated with site preparation and vary as a function of parameters such as soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on- and off-site.

Proposed project construction would involve the use of equipment such as flatbed trucks, tractors, excavators, loaders, backhoes, dump trucks, drill rigs, paver, graders, skip loaders, rollers, jackhammer, lifts, forklifts, crane, scrapers, compactor, striping truck, concrete mixers, concrete trucks, asphalt trucks, and potentially a pneumatic hammer and/or a hydraulic splitter. The total quantity of soil cut for the project would be approximately 20,000 cubic yards (cy), some of which is anticipated to be retained onsite for fill. Project construction activities include grubbing/land clearing, grading/excavation, drainage/utilities/subgrade, and paving. Project construction would include the import of approximately 11,340 cy of concrete and approximately 6,190 cy of asphalt. Construction is expected to begin in 2027 and last approximately one to two years, depending on the number of construction phases.

[3] Attainment Status (sdapcd.org)

Using the above information about the project's construction activities, an *Air Quality Analysis for the Riverford Road Roundabouts Project* dated September 24, 2024 prepared by RECON Environmental Inc. (hereinafter RECON) to quantify construction-related emissions using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Roadway Construction Emissions Model (RCEM) Version 9.0.1. The RCEM uses basic project information (e.g., construction duration, project type, project area) to estimate construction schedule and quantify exhaust emissions from heavy-duty construction equipment, haul trucks, and worker commute trips. RCEM is appropriate for use in San Diego as it is applicable for all statewide construction projects involving construction equipment subject to California Air Resources Board (CARB) construction emissions standards and incorporates statewide emission factor models (EMFAC2017 and Off-Road). RCEM calculates fugitive dust, exhaust, and off-gas emissions from grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, paving, etc.

SDAPCD specifies Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (SDAPCD Rules 20.1, 20.2, and 20.3). The County's Air Quality Guidelines allow the use of the SDAPCD AQIA as CEQA significance thresholds. The following daily criteria pollutant construction emissions were calculated for the proposed project, compared against the SDAPCD's AQIA thresholds, as presented in Table 1.

Table 1. Construction-Related Maximum Daily Criteria Pollutant Emissions

Description	VOC[(c)]	ROG[(c)]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (lbs/day)[(a)]	6	6	57	67	0.15	30	8
CEQA Thresholds of Significance (lbs/day)[(b)]	75	75	250	550	250	100	55
Exceeds Threshold of Significance	No	No	No	No	No	No	No

Notes:
(a) PM_{10} and $PM_{2.5}$ emissions include reductions in accordance with Caltrans' Standard Specification Section 14-9.01 to comply with SDAPCD dust abatement measures.
(b) CEQA thresholds from County of San Diego Guidelines for Determining Significance – Air Quality (County of San Diego 2007). VOC = volatile organic compounds; NO_X = oxides of nitrogen; PM_{10} = particulate matter with aerodynamic diameter less than 10 microns; $PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns; lbs/day = pounds per day
(c) ROG and VOC are considered interchangeable.

As stated above, the project proposes to improve operational traffic efficiency, circulation, and ease congestion within the SR-67/Riverford Road interchange. The project would not increase vehicle trips, Vehicles Miles Travelled, traffic volumes, or roadway capacity. Therefore, operational emissions would remain similar to existing conditions and potential construction emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase in criteria pollutants. As such, the proposed project's potential impacts due to cumulatively considerable net increase of criteria pollutants would be less than significant. Neither construction nor operational emissions would violate applicable federal or state regional ambient air quality standards or contribute substantially to potential existing violations.

Finally, a project's emissions may be individually limited but cumulatively considerable when taken in combination with past, present, and future development projects. Projects that do not exceed the thresholds of significance do not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile and do not impede attainment and maintenance of ambient air quality standards. A list of past, present, and future projects within

the surrounding area were evaluated and none emit significant amounts of criteria pollutants. Refer to Section XXI (Mandatory Findings of Significance), for a comprehensive list of the projects considered. The proposed project as well as the past, present and future projects within the surrounding area have emissions below the screening-level criteria, as established by the County's and CEQA guidelines for determining significance. Therefore, neither construction nor operational emissions associated with the proposed project are expected to create a cumulatively considerable impact, nor a considerable net increase in PM_{10} or any O_3 precursors and would result in a less than significant cumulative impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Discussion/Explanation:

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These groups include children, older adults, and persons with preexisting respiratory or cardiovascular illnesses. The County defines sensitive receptors to be schools, hospitals, residential care facilities, day-care centers, or other facilities that may house individuals with health conditions for extended periods of time and that would be adversely impacted by changes in air quality, such as residences, as described in the County of San Diego's Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality.

Less Than Significant Impact: The following sensitive receptors have been identified within a quarter mile of the proposed project (the radius was determined by the SCAQMD in which the dilution of pollutants is typically significant): single-family residences, located immediately adjacent to the southwestern edge of the project limits. Other receptors near the project site include an RV dealership and other business to the west of the project site, an RV park to the east, and visitors in the project vicinity, such as visitors of the self-storage site and San Diego River Park Regional Trail to the north.

Criteria Pollutants

As shown in Table 1, construction of the proposed project would result in construction-related criteria for air pollutant emissions, but at levels that would not exceed the County's thresholds of significance. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations.

Toxic Air Contaminants

The greatest potential for Toxic Air Contaminants (TAC) emissions would be related to diesel particulate matter (PM) emissions associated with heavy-duty construction equipment activity. Proposed project's construction activities are anticipated to last approximately one to two years and would cease following completion of the project. Thus, the total exposure to construction activities would be limited. Additionally, there would not be a constant and simultaneous plume of emissions released by the project; instead, the majority of construction emissions would be localized and vary by the construction equipment utilized at the time. Based on the anticipated

construction schedule and the highly dispersive nature of diesel particulate matter emissions, project construction would not expose sensitive receptors to substantial TAC concentrations.

Carbon Monoxide

Carbon Monoxide (CO) concentration is a direct function of motor vehicle activity, particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses, such as residential areas, schools, preschools, playgrounds, and hospitals. As a result, air districts typically recommend analysis of CO emissions at a local rather than a regional level.

The County's Guidelines for Determining Significance for Air Quality indicate that projects that cause road intersections to operate at or below a level of service (LOS) E, could cause a localized significant air quality impact, including CO emissions, and would require further localized hotspot analysis. The proposed project is not expected to result in a measurable and substantial increase in vehicle travel. As detailed in the *Riverford Road Roundabouts VMT Assessment* dated September 25, 2024, prepared by Linscott Law & Greenspan, Engineers (LLG), the proposed project seeks to replace and improve vehicle mobility, ease congestion, and improve roadway efficiency around the SR-67/Riverford Road interchange without increasing existing roadway capacity. Therefore, operational CO emissions would remain similar to existing conditions. The proposed project would also enhance pedestrian and bicycle safety, mobility, and connectivity by constructing shared-use pathways and sidewalks along segments of Riverford Road, Woodside Avenue, and North Woodside Avenue. With improved access for active modes of transportation around this interchange, implementation of the proposed project is not anticipated to result in an increased motor vehicle activity or congestion that would lead to a localized CO hotspot.

Construction activities are anticipated to last approximately one to two years. Therefore, the total exposure period for construction activities would be limited. As the proposed project would not exceed air quality emissions thresholds and because no substantial increase in new vehicle trips is anticipated, the proposed project would not expose sensitive receptors to substantial construction or operational criteria pollutants, TAC contaminants, or CO concentrations and the impacts would be less than significant.

In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project as well as the past, present and future projects within the surrounding area listed in Section XXI (Mandatory Findings of Significance) have emissions below the screening-level criteria, as established by the County's and CEQA guidelines for determining significance. Therefore, neither construction nor operational emissions associated with the proposed project are expected to create a cumulatively considerable impact, nor a considerable net increase in criteria pollutants, TAC or CO concentrations and would result in a less than significant cumulative impact.

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

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

Discussion/Explanation:

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While 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. Projects with the potential to frequently expose individuals to objectionable odors are deemed to have a significant impact. Typical facilities that generate odors include wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, and food processing facilities.

Less Than Significant Impact: Construction activities associated with the proposed project could result in short-term emissions from diesel exhaust associated with construction equipment and road paving. However, due to the highly diffusive properties of diesel exhaust, nearby receptors would not be affected by the odors associated with project construction. The proposed project would utilize typical construction techniques, include Best Management Practices (BMPs), and the odors would be typical of most construction sites and temporary in nature. Odors associated with construction would not result in significant nuisance odors that would result in a significant impact. Operation of the proposed project would not add any new odor sources beyond existing conditions, which includes the ongoing use of the existing SR-67/Riverford Road interchange. As a result, the proposed project would not create objectionable odors affecting a substantial number of people. Accordingly, the impact would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on the *Natural Environment Study for Riverford Road and State Route 67* dated September 2024 prepared by RECON, the proposed project would not result in impacts to species identified as a candidate, sensitive, or special status 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 (USFWS). It should be noted that the proposed project site is located within the adopted South County Multiple Species Conservation Program (MSCP) and is located on lands designated by the MSCP as “Unincorporated Land in Metro-Lakeside-Jamul Segment” with a negligible portion located in MSCP’s “Pre-Approved Mitigation Area.”

The following wildlife species were observed within the survey area but outside of the Project Impact Area (PIA):

- one special status plant species (southwestern spiny rush);
- ten special status wildlife species (two listed bird species: least Bell's vireo and coastal California gnatcatcher);
- seven special status birds and raptors: Cooper's hawk, red-shouldered hawk, Vaux's swift, green heron, yellow warbler, yellow-breasted chat, double-crested cormorant; and
- one special status reptile: Belding's orange-throated whiptail.

Neither the survey area nor the PIA contain federally-designated critical habitat for any listed species. Potentially suitable habitat for eight special status plant species is present within the survey area; however, only two of these plant species have a moderate potential to occur within the survey area, while the remaining species are not expected or have a low potential to occur within the survey area. Potentially suitable habitat for additional 24 special status wildlife species is present within the survey area, with 17 of them having a moderate potential to occur and the remainder having either a low potential or not expected to occur.

Special Status Wildlife Species

Coastal California Gnatcatcher

No federally-threatened coastal California gnatcatcher (CAGN) were observed within the PIA; however, suitable CAGN habitat – Diegan coastal sage scrub (CSS) – is present within the southern portions of the survey area and the PIA. CAGN was confirmed present within the survey area but outside of the PIA during protocol surveys conducted in spring and summer 2023. As a result, the proposed project has a potential to result in direct impacts to this species due to the contiguous suitable habitat; however, implementing the avoidance and minimization measures[4] below would minimize potential direct and indirect impacts to CAGN to a less-than-significant impact level. Specifically, two CAGN use areas were identified within or adjacent to the survey area; none are within the PIA. Neither the PIA nor the survey area contain areas mapped as federal critical habitat for CAGN.

The following **avoidance and minimization measures** (AMM) would minimize potential direct and indirect impacts to CAGN during construction:

AMM-1. According to the adopted MSCP, no clearing of occupied habitat may occur between March 1 – August 15. Although there is no occupied habitat within the PIA, as an avoidance measure all vegetation clearing/grubbing shall take place between August 16 – February 28, outside the CAGN nesting season. Outside of the breeding season, no biological monitoring shall be required. If vegetation removal occurs during the breeding season, pre-construction surveys and biological monitoring shall be required as noted below. If construction pauses for longer than seven days during the Migratory Bird Treaty Act (MBTA) nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

[4] The term "avoidance and minimization measures" represents project design features/Best Management Practices that prevent an impact from occurring. As such, they are not mitigation as referenced in CEQA Guidelines Section 15370.

AMM-2. Prior to construction during the bird breeding season, a qualified biologist shall perform a minimum of three focused pre-construction surveys, on separate days, in and adjacent to suitable habitat for the species to determine the presence of CAGN within the PIA. Surveys shall begin a maximum of seven days prior to performing construction within 300 feet of suitable habitat during the breeding season, and one survey shall be conducted the day immediately prior to the initiation of construction within 300 feet of suitable habitat during the breeding season. If suitable habitat is not removed during the initial construction clearing/grading, additional surveys shall be conducted immediately prior to each habitat removal within 300 feet of suitable habitat. If pre-construction surveys are negative for CAGN within the PIA, no additional measures for this species shall be required and vegetation clearing/grading can proceed.

AMM-3. Any nighttime construction lighting (e.g., staging areas, equipment storage sites, active work areas) shall be selectively placed and directed toward the construction site. Lighting shall be limited to the lowest illumination necessary to allow for safe completion of work and directed away from, shielded, or pointed downward and away from the adjacent habitat of the river corridor (for least Bell's vireo habitat) and adjacent CSS (for CAGN habitat).

AMM-4. Permanent roadway lighting shall be installed to help illuminate both roundabouts for drivers' and pedestrians' safety. Roadway lighting facilities shall be consistent with the County's and Caltrans' illumination standards and design requirements.

AMM-5. Prior to initiation of construction activities, orange construction fencing, or equivalent high-visibility construction fencing, shall be installed along the limits of construction disturbance adjacent to sensitive biological resource areas. All construction (including access/staging areas) shall be restricted to developed areas or previously defined/approved work areas. Equipment staging, storage, and maintenance shall be located outside the active river channel, riparian, and CSS vegetation. Temporary fencing shall be removed at the completion of construction.

AMM-6. A qualified biologist shall monitor construction activities as needed to oversee avoidance of sensitive biological resources, with full-time monitoring during initial vegetation removal, grubbing, and grading. Monitoring biologist shall be familiar with the special status species known to be present or with potential to occur on project site that could occur within the vegetation communities proposed for removal. Should a special status species be encountered, biological monitor shall request that the Resident Engineer stop work in the area. Biological monitor shall determine the next steps required (e.g., implement avoidance measures, contact Caltrans, the County, or wildlife resource agencies), and shall work with the RE to identify areas where work can proceed while measures are determined.

AMM-7. An employee education program shall be developed and implemented by a qualified biologist prior to construction. Each construction employee (including temporary, contractors, and subcontractors) shall receive a training/awareness program prior to working on the proposed project. Employees shall be advised of listed species in the project's vicinity and the potential penalties for taking of such species. At a minimum, the program shall include: occurrence of the listed and

sensitive species in the area (including photographs), their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of federal and State laws, reporting requirements, and project-specific mitigation and avoidance & minimization measures designed to reduce impacts to these species. Employee education program shall also cover project permit requirements, if applicable, and communication protocol with the public agency constructing the project and with wildlife resource agencies, if applicable.

AMM-8. The following general construction BMPs shall be employed to minimize impacts to sensitive biological resources from construction activities:

- Erosion and sediment control measures (e.g., straw wattles, gravel bags, silt fencing) shall be in place and in functional condition throughout all phases of the project where sediment run-on or run-off from exposed slopes threatens to enter the river or aquatic habitats. Jute for straw wattles must be made of natural material.
- Monitoring biologist shall check the project site immediately prior to and periodically during construction, to identify presence of invasive weeds and recommend measures to avoid their inadvertent spread resulting from construction activities. Measures may include inspection and cleaning of construction equipment and use of eradication strategies. Special care shall be taken during transport, use, and disposal of soils containing invasive weed seeds, and all weedy vegetation removed during construction shall be properly stored and disposed of to prevent spread into areas outside of the construction area.
- All heavy equipment shall be washed and cleaned of debris, sediment, and foreign matter prior to entering the project area to minimize the spread of invasive weeds.
- All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall be restricted to designated areas located outside of marked (e.g., flagged/staked) wetlands or waters. Spill prevention materials or equipment, such as drip pans and spill kits, shall be maintained on-site to contain any spill or inadvertent release of materials that may cause pollution or nuisance if such materials reach Waters of the United States (WOTUS)/Waters of the State (WOTS).
- All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them.
- Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access.
- Exposed trenches, holes, and excavations shall be inspected daily (i.e., at the end of the workday, before sealing the exposed area) either by the Resident Engineer, construction inspector, superintendent or project foreman to check for wildlife entrapment. Excavated areas shall provide an earthen ramp to allow for a wildlife escape route.

- All waste, including pet waste, shall be removed from the project area. All food-related trash shall be enclosed in sealed wildlife-proof containers and removed from the site daily. All construction-related debris, excess materials, and building materials shall be removed regularly from the project site for disposal at an authorized landfill or other disposal site, in compliance with federal, state, and local laws and regulations.
- Project personnel shall be prohibited from bringing domestic pets to construction sites to ensure pets do not disturb or depredate wildlife in adjacent native habitats.

No species-specific compensatory mitigation is required since impacts to CAGN shall be avoided through **avoidance and minimization measures** AMM-1 through AMM-8 described above.

In the event that CAGN are subsequently discovered within the PIA prior to construction, any direct impacts shall be fully mitigated below a level of significance through habitat-based compensatory mitigation in accordance with the County's Biological Mitigation Ordinance (BMO) since the project is located within the adopted MSCP and CAGN is a covered species under MSCP.

Least Bell's Vireo

Least Bell's vireo (LBV) is a federally- and state-listed endangered species, but neither the PIA nor the survey area contain federally designated critical habitat for LBV. LBV were observed within the survey area in four use areas during protocol surveys conducted in spring and summer 2023; however, no LBV were observed within the PIA. The PIA does contain a single small disturbed and concrete-locked patch of southern cottonwood-willow riparian forest that could provide marginally suitable habitat. Therefore, avoidance and minimization measures would be implemented to ensure the project would not result in significant impacts to LBV.

The following **avoidance and minimization measures** would minimize potential direct and indirect impacts to LBV individuals that could be present within the PIA during construction:

AMM-9. According to the adopted MSCP, no clearing of occupied habitat may occur between March 15 – September 15. Although there is no occupied habitat within the PIA, as an avoidance measure all vegetation clearing/grubbing shall occur between September 16 – March 14, outside the LBV nesting season. Outside of the breeding season, no biological monitoring shall be required. If vegetation removal occurs during the breeding season, pre-construction surveys and biological monitoring shall be required. If construction pauses for longer than seven days during the MBTA nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

AMM-10. Prior to construction during the bird breeding season, a qualified biologist shall perform a minimum of three focused pre-construction surveys, on separate days, in and adjacent to suitable habitat for the species, to determine the presence of LBV within the PIA. Surveys shall begin a maximum of seven days prior to performing construction within 300 feet of suitable habitat during the breeding season, and one survey shall be conducted the day immediately prior to the initiation of construction within 300 feet of suitable habitat during the breeding season. If the suitable habitat is not removed during the initial construction

clearing/grading, additional surveys shall be conducted immediately prior to each habitat removal within 300 feet of suitable habitat. If pre-construction surveys are negative for LBV within the PIA, no additional measures for this species shall be required and vegetation clearing/grading can proceed.

AMM-11. To ensure noise levels during construction are in compliance with the USFWS' guidance of 65 A-weighted decibels (dBA) and do not affect LBV use areas, all rock removal activities at the northern and southern roundabouts that may involve the use of a hydraulic splitter, pneumatic hammer, or any other noise-producing rock removal equipment or methods shall not occur simultaneously with any other general construction activities north of the defined Environmentally Sensitive Area line, as identified the *Natural Environment Report for Riverford Road and State Route 67* (Figure 6; September 2024) for all stages of construction.

No species-specific compensatory mitigation is required because impacts to LBV shall be avoided through **avoidance and minimization measures** AMM-3 through AMM-11 described above. In the event that LBV are subsequently discovered in the PIA prior to construction, any direct impacts shall be fully mitigated below a level of significance through habitat-based compensatory mitigation in accordance with the County's BMO since the project is located within the adopted MSCP and LBV is a covered species under MSCP.

CAGN and LBV: Other Considerations

Ambient noise level measurements and construction equipment noise modeling was performed at both LBV and CAGN use areas located near the project site. Based on USFWS' guidance and as communicated by Caltrans to the County of San Diego on November 13, 2023 for this project, the greater of either the ambient noise level or the standard 65 dBA L_{eq}[5] threshold is used to analyze construction noise impacts on sensitive bird species. Noise modelling determined that the ambient noise level at the LBV use areas was 55 dB(A), thus the 65 dB(A) L_{eq} threshold was used for this project. As the loudest construction noise level is not anticipated to rise above 65 dB(A) within the mapped LBV use areas with implementation of AMM-11, no significant impacts to LBV from construction noise would occur.

Noise modelling determined that the ambient/existing condition noise level at the CAGN use areas was 67 dB(A), thus this was used as the threshold for this project. As construction noise is not anticipated to rise above 67 dB(A) within the mapped CAGN use areas, there would be no significant impacts to CAGN from construction noise (NES Appendix H, September 2024). Therefore, construction noise would not cause significant impacts to these species.

Once the project is built, no changes to noise levels within the SR-67/Riverford Road interchange are anticipated because reconfiguration of both intersections would not result in an increase in the number or frequency of vehicles using this interchange, nor would it decrease the proximity of vehicles in relation to use areas for CAGN or LBV.
Additionally, projects that comply with MSCP, as specified by the County's Subarea Plan and its ordinances, are not expected to result in significant cumulative impacts for those biological resources adequately covered by the MSCP, which includes CAGN and LBV. Therefore, project implementation would not result in significant cumulative impacts.

[5] Leq represents an average of the sound energy occurring during a one-hour period. The A-weighted scale is used for assessing the effects of noise on birds.

Southwestern Willow Flycatcher

No federally-endangered southwestern willow flycatchers (SWF) were detected within the survey area, and there are no reported sightings of SWF within a mile of the PIA. Although no SWF was observed, the survey area contains suitable habitat to support nesting of SWF; therefore, SWF has a moderate potential to occur within the survey area due to the presence of the marginally suitable, disturbed, and isolated patch of southern cottonwood-willow riparian forest in the northern portion of the survey area. Neither the PIA nor the survey area contain federal critical habitat for SWF.

No direct impacts to the SWF species are anticipated, and, therefore, no species-specific compensatory species or habitat mitigation is required. Any temporary impacts to suitable habitat would be restored to pre-existing conditions. Implementation of **avoidance and minimization measures** AMM-3 through AMM-8 would reduce impacts to less than significant.

When combined with current, future, and reasonably foreseeable actions in the vicinity of the survey area, implementation of the project is not anticipated to result in adverse cumulative impacts to SWF. In accordance with federal, state, and local policies, other projects in the larger general area with similar impacts would be required to minimize and/or mitigate impacts to this species and its habitat. No significant cumulative impacts as a result of the project would occur.

Other Special Status / Migratory Birds

The following seven special status bird species were observed within the survey area but outside of the PIA: yellow-breasted chat (CDFW species of special concern), yellow warbler (CDFW species of special concern), Cooper's hawk (CDFW watch list and County Group 1 species), red-shouldered hawk (County Group 1 species), Vaux's swift (CDFW species of special concern), double-crested cormorant (CDFW watch list and County Group 2 species), and green heron (County Group 2 species). Two other special status birds were not observed but have a moderate potential to occur within the survey area: white-tailed kite (CDFW fully protected species) and southern California rufous-crowned sparrow (CDFW watch list and County Group 1 species).

If vegetation removal takes place during the sensitive bird species' nesting season (between January 15 and September 15), direct impacts to the species listed above may occur. Implementation of the following **avoidance and minimization measures** would avoid and minimize potential impacts to these special status species, if found to be present within the PIA:

AMM-12. All vegetation clearing/grubbing shall take place between September 16 – January 14, outside of the combined avian nesting season. If vegetation removal needs to occur during the breeding season, pre-construction surveys and monitoring shall be required. If construction pauses for longer than seven days during the Migratory Bird Treaty Act (MBTA) nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

AMM-13. During the bird breeding season, a qualified biologist shall perform focused pre-construction surveys in and adjacent to suitable habitat for the species to determine the presence of active nests within the PIA. Survey shall be conducted a maximum of seven days prior to performing construction within 300 feet of

suitable habitat during the breeding season. If the suitable habitat is not removed during the initial clearing/grading construction effort, additional surveys shall be conducted immediately prior to each habitat removal during project construction within 300 feet of suitable habitat. If pre-construction surveys are negative for active nests within the PIA, no additional measures shall be required.

No species-specific compensatory mitigation for "other special status birds" or migratory birds is required. Projects that comply with the MSCP, as specified by the County's Subarea Plan and its ordinances, are not expected to result in a significant cumulative impact for those biological resources adequately covered under the MSCP. While only two of the bird species (Cooper's hawk and Southern California rufous-crowned sparrow) discussed above are MSCP-covered species, **avoidance and minimization measures** AMM-1 through AMM-13 would reduce impacts to all above-listed bird species to a less than significant level and not result in a significant cumulative impact.

Bats

A habitat assessment for several bat species, listed as CDFW species of special concern, was conducted as part of the general survey, and suitable habitat/crevices for western red bat and western yellow bat exist on the underside of the Riverford Road bridge (that spans San Diego River), underneath SR-67 overpasses, and in riparian trees. Riparian trees are primarily located in the survey area but outside of the PIA. If species are present, the following **avoidance and minimization measures** would minimize impacts to potentially occurring bat species:

AMM-14. A biologist with expertise and experience with bats shall be retained as a designated bat biologist. The designated bat biologist shall have at least 3 years of experience in conducting bat habitat assessments, day roosting surveys, and acoustic monitoring, and have adequate experience identifying local bat species (visual and acoustic identification), type of habitat, and differences in roosting behavior and types (i.e., day, night, maternity). In order to avoid direct impacts to any potentially tree-roosting bats, the designated bat biologist shall survey any trees with potential to support this species that are proposed for trimming or removal immediately prior to the activities; if bats are present, biologist shall be present during all vegetation removal and tree trimming at the occupied habitat and examine the branches for nonvolant (nonflying) juvenile bats prior to disposal.

AMM-15. During construction, the removal of trees or their branches shall be avoided to the maximum extent practicable within or adjacent to occupied bat habitat, if found. If tree removal or trimming is necessary for project construction, this activity shall be performed outside the bat maternity season (May through August 31) to avoid impact to flightless young. If any trees are occupied by tree-roosting bats, additional avoidance/mitigation measures shall be implemented as recommended by the biological monitor. Any injured or potentially injured bats shall be transported by the designated bat biologist to a CDFW-licensed bat rehabilitator within 24 hours. With the implementation of these measures, the project is expected to avoid significant direct impacts to the western red bat and western yellow bat, if present.

No species-specific compensatory mitigation for bats is required. Implementation of **avoidance and minimization measures** AMM-3, and AMM-4 through AMM-8, plus measures AMM-14 and AMM-15 would reduce impacts associated with wetlands and sensitive vegetation communities

that could support this species to a level that is less than significant. Therefore, implementation of the project would not result in significant cumulative impacts.

Crotch's Bumble Bee

There are no reported records of Crotch's bumble bee (State-listed endangered species) within a mile of the site, and no bumble bees were noted during the biological reconnaissance survey; however, upland habitat within the project site is potentially suitable, given the species' preference for scrub habitats that support flowering plants. Therefore, this species has a moderate potential to occur within the project site. Although direct or indirect permanent or temporary impacts are not anticipated to occur from construction, the following **avoidance and minimization measures** would be required to ensure avoidance of impacts:

AMM-16. Prior to vegetation clearing for construction, a Crotch's bumble bee habitat assessment shall be conducted by a qualified biologist during the spring when nectar plants are at peak bloom, in accordance with the most current survey guidance developed by CDFW (2023). Prior to the habitat assessment, the baseline data and recent aerial photographs shall be reviewed to identify locations with the highest potential to support Crotch's bumble bee. During the habitat assessment, the survey area shall be traversed, and potential nectar sources mapped based on the location and abundance of blooming plants. In accordance with CDFW's survey guidance, habitat quality shall be characterized and classified based on criteria which includes but is not limited to: the presence and abundance of nectar plants and physical characteristics of the habitat (slope and vegetation density), out-of-season nectar sources, nesting resources (e.g., abandoned burrows), quality of overwintering habitat and other factors. Criteria used to categorize low, moderate, and high nectar abundance within the survey area shall include the presence of potential nesting resources (e.g., small mammal burrows, flowering plants, and openings within scrub and grassland habitats).

AMM-17. If species or nectar sources are observed/mapped during the habitat assessment prior to vegetation clearing for construction, a focused survey shall be conducted by a qualified biologist during the Crotch's bumble bee flight season (April through August) prior to any vegetation clearing or grading based on the location of nectar sources mapped during the habitat assessment. The survey would be repeated during each subsequent flight season, should additional vegetation removal be required following the initial clearing prior to construction commencement. The survey shall be conducted in accordance with the current CDFW guidelines in effect at the time of the survey, which currently requires three surveys conducted between April and August, spaced at least two weeks apart. Surveys will also be conducted in accordance with CDFW guidelines' requirements regarding surveys frequency (e.g., repeat the survey during each subsequent flight season, should additional vegetation removal be required following the initial clearing prior to construction commencement). Per the guidance, any non-lethal capture and handling of bees shall require a Memorandum of Understanding (MOU) 2081(a) from CDFW. If non-capture methods are employed for Crotch's bumble bee detections, such as taking photographs for an identification voucher, these shall be verified by a taxonomic expert.

AMM-18. If Crotch's bumble bee is not detected, no further action shall be required. A report of the negative survey shall be submitted to the County and CDFW. If any Crotch's bumble bees are detected outside of the flight season referenced in AMM-16, a qualified biologist shall notify CDFW and the County and shall attempt to identify any nest locations. CDFW shall be consulted to determine if project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to construction (i.e., project activities). ITP conditions shall be fulfilled prior to initiating project activities. Take of any endangered, threatened, candidate species as a result of project construction is prohibited, except as authorized by State law under the California Endangered Species Act.

No species-specific compensatory mitigation for Crotch's bumble bee is required. All temporary-impacted areas would be revegetated to pre-construction conditions upon project completion. Projects that comply with the MSCP, as specified by the County's Subarea Plan and its ordinances, are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. While this species is not covered by the County's MSCP Subarea Plan, the habitat utilized by this species is. Implementation of **avoidance and minimization measures** AMM-3 through AMM-8 and AMM-16 through AMM-18 would reduce impacts to sensitive vegetation communities that could support this species to less than significant. Therefore, implementation of the project would not result in significant cumulative impacts.

Other Sensitive Wildlife

No direct or indirect permanent or temporary impacts to monarch butterfly (candidate for federal threatened or endangered listing) are anticipated due to construction, as neither the host plant nor eucalyptus trees were observed within the PIA. Therefore, no avoidance or minimization measures are required and no impacts would occur.

No reptiles and amphibians were observed within the PIA, but several species were either observed within the survey area or have a potential to occur. Although direct impacts to special status amphibian and reptile species are not anticipated, any potential impacts would be limited to a small area of habitat (as opposed to the available habitat along the river corridor), and much of the habitat that may be impacted is already subject to ongoing disturbance from the adjacent roadways and trails. Therefore, if present, the number of affected individuals is anticipated to be very low and would not have an effect on the regional long-term species' survival. Implementation of **avoidance and minimization measures** AMM-3 through AMM-8 would minimize potential direct impacts and, therefore, no cumulative impacts would occur and no species-specific compensatory mitigation is required.

Special Status Plant Species

During the biological surveys conducted for the proposed project, no special status plant species were observed with the PIA. However, as discussed below, one species was observed within the survey area (southwestern spiny rush), and two species have a moderate potential to occur within the PIA or survey area (San Diego sagewort and Robinson's peppergrass).

Southwestern Spiny Rush

Southwestern spiny rush was observed within the survey area but outside of the PIA. It is a County List D and California Rare Plant Rank (CRPR) 4.2 species. Approximate 32 southwestern spiny rush individuals were observed within the survey area east of the Riverford Road bridge. Because no impacts would occur to this species, no avoidance, minimization or compensatory mitigation measures are required.

San Diego Sagewort

San Diego sagewort (=Palmer's sage) was not observed either within the PIA or survey area, but it has a moderate potential to occur within the PIA due to the 0.08 acre of suitable riparian habitat present within the PIA. San Diego sagewort is a County List D and CRPR 4.2 species (CNPS 2023). Although there is a potential for direct or indirect permanent or temporary impacts to San Diego sagewort, impacts to a few individuals are not anticipated to reduce this species to a less than self-sustaining level. In addition, **avoidance and minimization measures** AMM-5 through AMM-8 would be implemented to ensure that impacts would be less than significant.

Robinson's Peppergrass

Robinson's peppergrass was not observed in either the PIA or survey area but it has a moderate potential to occur within the survey area and the PIA. Robinson's peppergrass is a County List A and CRPR 4.3 species (CNPS 2023). Potential direct or indirect permanent or temporary impacts may occur from construction, if species are present within the PIA. The following **avoidance and minimization measures** would avoid and minimize potential impacts:

AMM-19. A focused rare plant survey shall be conducted in the spring prior to the start of construction to confirm presence and extent of on-site populations of any special status plant species.

AMM-20. If observed within the PIA, prior to initiation of construction activities, a qualified biologist shall flag or fence special status plant species that occur within the temporary impact areas, as confirmed during the focused rare plant survey. Special status plant species shall be avoided to the maximum extent feasible within the temporary impact areas.

AMM-21. Any special status plant species that cannot be avoided within temporary impact areas shall be salvaged for transplant or included in the seed or plant palette for revegetation. If project timing allows, seed should be collected from individuals within the PIA prior to the start of construction.

AMM-22. If species are found onsite during the pre-construction focused plant surveys and would be impacted by the project, then mitigation shall be required and could be accomplished through inclusion of this species in on-site restoration of the temporarily impacted CSS areas. All available Robinson's peppergrass seed from within the temporary impact areas of the PIA shall be collected prior to project impact, to be used on-site as part of the restoration plant palette. Additional seed from within the project vicinity shall be collected, if needed, and shall be no more than 5 percent of the total available seed.

With the implementation of **avoidance and minimization measures** AMM-5 through AMM-8 and AMM-19 through AMM-22, the project is not anticipated to result in a substantial loss of Robinson's peppergrass and the impact would be less than significant.

Cumulative impacts from the project were evaluated with regard to past, present, and future projects within the project vicinity. While there would be some permanent loss of habitat for special status species (wildlife and plant), these impacts would be the minimal necessary and are not expected to contribute to cumulative loss of habitat for any of these species. Additionally, avoidance and minimization measures would be implemented to avoid and minimize impacts, and any areas temporarily impacted during construction would be restored. Compensatory habitat-based mitigation for permanent impacts would be implemented, to provide in-kind foraging and nesting habitat to affected species.

In summary, any substantial adverse effects through habitat modification on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, would be mitigated to a level below significant.

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on the *Natural Environment Study for Riverford Road and State Route 67* dated September 25, 2024 prepared by RECON, the proposed project would result in permanent and temporary impacts to two sensitive vegetation communities: southern cottonwood-willow riparian forest (County Biological Mitigation Ordinance Tier I) and CSS (County Biological Mitigation Ordinance Tier II). In addition, because the project is located within the adopted MSCP, portions of the project site meet the criteria for Biological Resource Core Area[6] (BRCA), as identified in Table 2.

No direct impacts to vegetation under the Riverford Road bridge (spanning San Diego River) would occur as all temporary construction impacts would be limited to existing roadway on top of the bridge.

[6] BRCA is land that qualifies as an integral component of a viable regional ecosystem (MSCP, BMO).

Table 2: Vegetation Community Impacts and Mitigation

Vegetation Community (County MSCP Tier Levels)	Temporary Impacts[1] (acres)	Permanent Impact		
		Impacts (acres)	Mitigation Ratio [2]	Mitigation Requirement[3] (acres)
Disturbed southern cottonwood-willow riparian forest (Tier I) [non-BRCA]	0.04	0.04	1:1	0.04
Subtotal Wetland/Riparian	**0.04**	**0.04**		**0.04**
Diegan coastal sage scrub (Tier II) [non-BRCA]	0.12	0.33	1:1	1.47
Disturbed Diegan coastal sage scrub (Tier II) [non-BRCA]	–	1.14		
Disturbed Diegan coastal sage scrub (Tier II) [BRCA]	–	0.07	1.5:1	0.11
Disturbed habitat (Tier IV)	0.70	5.94	n/a	–
Urban/ developed (no tier)	3.26	5.98	n/a	–
Subtotal Upland	**4.08**	**13.46**	–	**1.58**
Total	**4.12**	**13.50**	–	**1.62**

NOTE: Numbers may not total due to rounding. Also, this table does not include impacts to habitat underneath Riverford Road bridge because although work may occur within the road/bridge, it would not affect the vegetation underneath the bridge.

[1]All temporary impacts would be restored on-site with habitat of equal or greater value at a replacement ratio of 1:1.

[2]Mitigation ratios reflected here are for permanent impacts only, which are based on whether the impacted land is considered to be a biological core resource area (BRCA). Accordingly, the vegetation communities are presented as either BRCA or non-BRCA.

[3]Mitigation for permanent wetland and upland impacts would either be accomplished within the PIA or purchase credits from a mitigation bank within the San Diego River watershed or a watershed closest to the project area, whichever has eligible mitigation credits available.

As shown in Table 2 above, the following **compensatory mitigation measures** are proposed to reduce the impacts to a level below significant:

M-BIO-1: Direct permanent impacts to 1.54 acres of CSS (1.47 acres of non-BRCA and 0.07 acre of BRCA) shall be mitigated at a ratio of 1.5:1 for BRCA and 1:1 for non-BRCA. This equates to a mitigation total of 1.58 acres (0.11 acres of BRCA and 1.47 acre of non-BRCA) of CSS. Temporary direct impacts to 0.12 acres of disturbed non-BRCA CSS shall be mitigated at a 1:1 ratio, which equates to 0.12 acre of CSS. Temporary impacts would be restored on-site with habitat of equal or greater value. Permanent impacts shall be mitigated in the form of either enhancement, restoration, and/or creation of habitat on- or off-site, or a deduction of credits from a pre-approved mitigation area or a mitigation bank.

M-BIO-2: Direct permanent impacts to 0.04 acre of disturbed non-BRCA southern cottonwood-willow riparian forest shall be mitigated at a ratio of 1:1, which equates to a mitigation total of 0.04 acre of southern cottonwood-willow riparian forest. Temporary direct impacts to 0.04 acre of disturbed non-BRCA southern cottonwood-willow riparian forest shall be mitigated at a 1:1 ratio, which equates to 0.04 of southern cottonwood-willow riparian forest. Permanent impacts shall be mitigated in the form of either enhancement, restoration, and/or creation of habitat on- or off-site, or a deduction of credits from a pre-approved mitigation area or a mitigation bank.

For impacts listed in Table 2, **compensatory mitigation measures** M-BIO-1 and M-BIO-2 and **avoidance and minimization measures** AMM-3 through AMM-8 would reduce any significant adverse impacts to southern cottonwood-willow riparian forest and CSS habitat to a level below significant.

Projects that comply with MSCP, as specified in the County's Subarea Plan and its ordinances, are not expected to result in a significant cumulative impact for those biological resources adequately covered under MSCP, including vegetation communities of southern cottonwood-willow riparian forest and CSS. In addition, the proposed project, along with other current and reasonably foreseeable future projects, would not have a significant cumulative impact to riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or as identified by CDFW and USFWS.

With the implementation of avoidance and minimization measures and the proposed mitigation measures, the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS and impacts would be reduced to a level of less than significant.

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on the *Aquatic Resources Delineation Report for the Riverford Road Roundabouts Project* dated December 15, 2023, prepared by RECON, the following resources are present within the PIA: CDFW jurisdiction. No direct impacts would occur to potential U.S. Army Corps of Engineers (USACE) or Regional Water Quality Control Board Wetland (RWQCB) non-wetland WOTUS or WOTS, as the work along the Riverford Road bridge would not result in impacts to aquatic resources under the bridge. Permanent and temporary impacts to CDFW riparian coincide with the impacts to disturbed non-BRCA southern cottonwood-willow riparian forest (see M-BIO-2).

Table 3: Potential Jurisdictional Resources within Survey Area

Jurisdictional Resource[1]	Acreage in Survey Area (linear feet)	Acreage of Temporary Impacts[1]	Acreage of Permanent Impacts
USACE Waters of the U.S.			
Wetland Waters of the U.S.	1.96	--	--
Non-wetland Waters of the U.S.	0.13 (110)	--	--
USACE Subtotal[2]	**2.08 (110)**		
RWQCB Waters of the State			
Wetland Waters of the State	1.96	--	--
Non-wetland Waters of the State	0.16 (410)	--	--
RWQCB Subtotal[2]	**2.12 (410)**		
CDFW Jurisdiction			
Riparian	3.27	0.04	0.04
Streambed	0.16 (410)	--	--
CDFW Subtotal[2]	**3.43 (410)**		

[1]This table does not include jurisdictional resources underneath Riverford Road bridge because the project only occurs on Riverford Road. No project features or impacts are proposed underneath the bridge
[2]Any discrepancies in totals are due to rounding.

Mitigation for temporary and permanent impacts to CDFW riparian would coincide with the proposed compensatory mitigation for impacts to southern cottonwood-willow riparian forest and would be mitigated as described in measure M-BIO-2. **Mitigation measure** M-BIO-2 and **avoidance and minimization measures** AMM-3 through AMM-8 to impacts listed in Table 3 would reduce any substantial adverse impacts to state-protected riparian areas and the impact would be less than significant. Permanent impacts to sensitive vegetation communities shall be mitigated in accordance with the BMO.

Projects that comply with the MSCP, as specified by the County's Subarea Plan and its ordinances, are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP, including riparian habitat. In addition, the proposed project, along with other current and reasonably foreseeable future projects, would not have a significant cumulative impact to state or federally protected wetlands, waters, or riparian areas after implementation of mitigation measures.

With the implementation of the above avoidance and minimization measures, combined with the mitigation measures, the proposed project would not have a substantial adverse effect on jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW, or RWQCB.

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

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

Discussion/Explanation:

Less Than Significant Impact: Based on the *Natural Environment Study for Riverford Road and State Route 67* dated September 25, 2024, prepared by RECON, the San Diego River represents a regional wildlife corridor near the project, though the wildlife corridor is located

outside of the PIA. Because the San Diego River is located outside the PIA, the project would not cause impacts within the river channel, alter or impede wildlife use of the corridor. While the project would result in minor impacts to vegetation adjacent to existing roadways, construction activity would be temporary and impacted areas would be revegetated following completion of construction, returning it to functional pre-construction conditions. Additionally, a small portion of the PIA includes the Riverford Road bridge that spans over the San Diego River; however, this work would only involve temporary construction on top of the bridge (road/sidewalk) and would not affect the river or habitat underneath or be expected to disrupt wildlife movement under the bridge. Last, any temporary construction fencing would be installed in a manner and location that would not preclude animal passage. Post construction, wildlife activity levels within work areas is expected to return to pre-construction conditions.

Finally, the project has been designed to limit impacts to the minimum necessary to fulfill the project's purpose and has been designed to minimize impacts to natural vegetation communities. Implementation of **avoidance and minimization measures** AMM-3 through AMM-8 would lessen impacts to wildlife movement and habitat connectivity.

Projects that comply with the MSCP, as specified by the County's Subarea Plan and its ordinances, are not expected to result in a significant cumulative impact for biological resources adequately covered by the MSCP, including wildlife movement corridors. Therefore, implementation of the project would not result in significant cumulative impacts, including to wildlife movement.

The project would not impede movement or access of any native resident, migratory fish, or wildlife species to foraging habitat, breeding habitat, wildlife nursery sites, water sources, wildlife corridors, or other areas necessary for their reproduction. Impact would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: Based on the approval and implementation of the South County MSCP, the County also adopted the BMO, which is discussed in Section IV(f) (Biological Resources) because it is related to the County's Habitat Conservation Plan. The proposed project would also comply with the County's BMO and policies and ordinances protecting biological resources identified in the County's General Plan, specifically the Conservation and Open Space Element. Existing designated Biological Open Space Easements are located adjacent to and immediately north of the proposed project. However, no easements are located within the PIA and no impacts would occur, as avoidance and minimization measures described in Section IV (Biological Resources) questions (a) through (c) would be implemented.

Appendix K of the County's Conservation Element outlines the County's Resource Conservation Areas (RCA), which are described and delineated in each of the Subregional Plan Areas. Each

RCA was designated with a purpose specific to that area. The proposed project is not located on or near a designated RCA and no impacts to an RCA would occur.

Further, the County's Zoning Ordinance lists lands with a special zoning designation or Special Area Regulation, which include certain restrictions pursuant to the Zoning Ordinance. The proposed project is not located on properties with Special Area Regulation designations or zoning restrictions for biological resources, such as areas zoned S81 for Ecological Resource Area Regulations. Finally, County's Resource Protection Ordinance (RPO) restricts impacts to various natural resources including wetlands, wetland buffers, floodplains, steep slopes, sensitive habitat lands and historical sites; however, pursuant to Section 86.605(c), the proposed project is exempt from the RPO because it is considered an essential public facility as defined by Section 86.602(d). Therefore, proposed project would not conflict with local policies or ordinances protecting biological resources and no impact would occur.

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?

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

Discussion/Explanation:

Less Than Significant Impact: In 1998, the County entered into an agreement with the CDFW and USFWS for the South County MSCP, which is a regional conservation plan. The proposed project site is located within the adopted South County MSCP on lands designated as "Pre-Approved Mitigation Area" and "Unincorporated Land in Metro-Lakeside-Jamul Segment". The project would comply with the County's MSCP Subarea Plan, BMO, and MSCP Findings of Conformance dated October 25, 2024 were prepared for this project to show consistency with the Subarea Plan and the County's BMO; therefore, the project would not affect a local, regional, or state conservation plan.

In addition, the project would not interfere with County's Habitat Conservation Plan, the currently-in-progress "County of San Diego Butterflies Habitat Conservation Plan," or reduce the likelihood of the survival and recovery of listed species in the wild, as all feasible avoidance, minimization, and mitigation measures have been incorporated into the project, and all impacts from the proposed project would be mitigated. The impact would be less than significant.

V. CULTURAL RESOURCES

Would the project:

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

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

Discussion/Explanation:

No Impact: Historical resources information about the project site was gathered from a variety of sources. First, on August 22, 2023, records were obtained from the California Historical Resources Information System (CHRIS) of the South Coastal Information Center (SCIC). Second, the Native American Heritage Commission (NAHC) was consulted and responded on September 7, 2023. Next, an intensive pedestrian survey of the project site and a 100-foot buffer was conducted on September 19, 2023 by Carmen Zepeda-Herman, accompanied by a Native American monitor Erica Gonzalez of Jamul Indian Village. The results of the survey are provided in the *Archaeological Survey Report for the Riverford Road Roundabouts Project* prepared by RECON, dated September 2024.

Based on the analysis of records obtained from SCIC, NAHC, a review of historical maps and aerials of the project site, and the survey results, it was determined the project site does not contain any historical resources. The results of the survey are provided in a historical resources report titled, *Historical Property Survey Report for the Riverford Road Roundabouts Project,* prepared by RECON and dated September 2024. Therefore, the proposed project would not result in impacts to historical resources.

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

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

Discussion/Explanation:

No Impact: Information about the project site was gathered from a variety of sources. As stated in response to question (a) above, records were obtained from CHRIS of the SCIC on August 22, 2023. The NAHC was consulted and responded on September 7, 2023, and an intensive pedestrian survey of the project site and a 100-foot buffer was conducted on September 19, 2023 by Carmen Zepeda-Herman, accompanied by a Native American monitor Erica Gonzalez of Jamul Indian Village. Last, outreach to Native American tribal members also occurred and took place between November 2023 and January 2024.

Based on the results of consultations with the Native American tribal representatives, analysis of records from SCIC, NAHC, a review of historical maps and aerials of the project site, and the results of a pedestrian survey, it was determined the project site does not contain any archeological resources. The results of the pedestrian survey are provided in the *Archaeological Survey Report for the Riverford Road Roundabouts Project*, prepared by RECON, dated September 2024. The proposed project would not result in impacts to archeological resources.

The NAHC was also contacted by the County as part of the Sacred Lands Search and provided a response letter on September 7, 2023 indicating that the results were positive. The NAHC provided a contact list of local Native American tribes, bands, or individuals with potential concerns or interests in the cultural resources which may be present within or near the proposed project site. Additionally, pursuant to the Assembly Bill 52 (AB 52), the NAHC was also contacted on October 18, 2023 for a list of Native American tribes who have requested notice from CEQA

Lead Agencies under AB 52, and the requested contact list of Native American tribes, bands, or individuals was provided to the County on November 21, 2023.

On November 22, 2023, the County notified tribes identified on both NAHC contact lists by email and U.S. mail, inquiring whether the tribal members desired to consult on the proposed project under AB 52, Sacred Lands, and Section 106[7]. Follow-up emails were sent on December 7, 2023 and January 8 and 9, 2024. Responses to initiate AB 52/Sacred Lands consultation were received from Campo Band of Mission Indians, Jamul Indian Village, and La Posta Band of Mission Indians/Grey Wolf Band.

Per the requests made during the AB 52 and Sacred Lands consultation, design features AMM-23 through AMM-27 were incorporated in the event historical and/or archeological resources are inadvertently discovered during construction. Additionally, County and Caltrans District 11 will continue to coordinate regarding cultural resources avoidance and minimization measures for construction and ensure compliance with the County's and Caltrans' cultural resources guidance, policies, and other applicable laws and regulations.

AMM-23. A specific location within the construction staging area shall be designated for potential inadvertent cultural discoveries.

AMM-24. A County-provided qualified archaeologist and a Kumeyaay Native American monitor shall be present during the project-related vegetation clearing and grubbing and initial ground-disturbing activities. If inadvertent discoveries of historical resources, tribal cultural resources, or archaeological resources are made, the County, project archaeologist, and Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to assess the significance of the resources and confer regarding the appropriate treatment (i.e., preservation, avoidance, and/or mitigation for the resources). The project archaeologist shall consult with the Kumeyaay Native American monitor in assessing the potential significance of the tribal cultural resource. Work may proceed in other parts of the project that does not disturb the area of concern or disrupt the investigation while historical or unique resource mitigation takes place. As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a CEQA Lead Agency shall make provisions for historical or unique archaeological resources inadvertently discovered during construction. Cultural resources may be repatriated to an appropriate, traditionally and culturally affiliated Native American tribe. If the traditionally and culturally affiliated tribe does not accept the materials for repatriation, then those tribal cultural resources shall be subject to curation in accordance with the County's curation policy.

AMM-25. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation of tribal cultural resources and archaeological resources. Work could continue in other parts of the project site while historical or unique archaeological resource mitigation takes place. The project archaeologist, in

[7] At the time of this writing, funding from the Federal Highway Administration may be received in the future, which would require compliance with Section 106 of the National Historic Preservation Act pursuant to the National Environmental Policy Act.

consultation with the County staff archaeologist, and in consultation with the Kumeyaay Native American monitor, where appropriate, shall determine the significance of the discovered resources. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the archaeologist, in consultation with the Kumeyaay Native American monitor, and approved by the County staff archaeologist, then carried out using professional archaeological methods.

AMM-26. Inadvertent Archaeological Find. If during ground disturbance activities, unique cultural resources are discovered, the following procedures shall be followed:

i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the County, project archaeologist, and appropriate Native American representative to discuss the significance of the find.
ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the County, appropriate Native American representative, and the project archaeologist, a decision shall be made as to the appropriate mitigation (e.g., documentation, recovery, avoidance) for the cultural resources.
iii. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored by additional cultural monitors if needed.
iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or reburial-burial on the project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.
v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III Data Recovery Plan shall be prepared by the project archaeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of said plan.
vi. Consistent with California Public Resources Code, Section 21083.2(b), and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for cultural resources.

AMM-27. Cultural Resources Disposition. The following procedures, in order of preference, shall be employed with the tribes and carried out for final disposition of the inadvertent discoveries of Native American cultural resources:

i. Preservation in place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
ii. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not

occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.

iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a San Diego County curation facility or Tribal curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV Monitoring Report.

The following procedure shall be employed for the disposition of historic period cultural materials:

i. Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

Based on the consultations with the Native American tribal members, analysis of records obtained from SCIC, NAHC, a review of historical maps and aerials of the project site, and pedestrian survey results, it was determined the project site does not contain any archaeological resources. Avoidance and minimization measures AMM-23 through AMM-27 were incorporated in the event archaeological resources are inadvertently discovered during construction. Therefore, the proposed project would not result in impacts to archaeological resources.

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

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

Discussion/Explanation:

No Impact: Records from CHRIS layer of the SCIC were obtained on August 22, 2023, from the NAHC on September 7, 2023, and an intensive pedestrian survey of the project site and a

100-foot buffer was conducted on September 19, 2023, by Carmen Zepeda-Herman and accompanied by a Native American monitor Erica Gonzalez of Jamul Indian Village.

Based on the records obtained from SCIC, NAHC, review of historical maps and aerials of the project site, and the pedestrian survey results, it was determined the project would not disturb human remains because the project site does not include a formal cemetery or archaeological resources that might contain interred human remains. The results of the survey are provided in the *Archaeological Survey Report for the Riverford Road Roundabouts Project*, prepared by RECON, dated September 2024.

Per the request made during the AB-52 and Sacred Lands consultation with the Native American tribal members, AMM-28 and AMM-29 design features are included to ensure proper procedures for handling of any human remains that may be potentially inadvertently found during construction.

AMM-28. Human Remains Avoidance and Minimization Efforts. A qualified archaeologist and a Kumeyaay Native American monitor shall be provided during the initial project-related ground-disturbing activities. If human remains are encountered, consistent with California Health and Safety Code, Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin of the remains. Consistent with California Public Resources Code, Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made.

AMM-29. If the County Coroner determines the remains to be Native American, the NAHC shall be contacted within 24 hours. The NAHC shall immediately identify the most likely descendant(s) (MLD) and notify them of the discovery. The MLD shall make recommendations within forty-eight (48) hours after being allowed access to the site and engage in consultations with the landowner concerning the treatment of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further construction activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted. Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed.

Avoidance and minimization measures AMM-28 and AMM-29 were incorporated in the event human remains are inadvertently discovered during construction, including those interred outside of dedicated cemeteries. Therefore, the proposed project would not result in impacts to human remains, including those interred outside of dedicated cemeteries.

VI. ENERGY

Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes infrastructure improvements to public transportation and pedestrian facilities for the purpose of traffic circulation and pedestrian access improvement. The project does not involve or introduce ongoing operational uses that would create a new source of energy consumption. During construction, temporary consumption of energy resources would occur for the purpose of equipment and materials, but the duration and area of construction would be limited. Compliance with local, state, and federal regulations, which limit engine idling times and require recycling construction debris would reduce short-term energy demand during construction, to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than standard construction projects. No deviation from current emissions standards and related fuel efficiencies would occur. Furthermore, individual project elements are required to be consistent with the County Operations Strategic Energy and Sustainability Management Program, including the County's Strategic Sustainability Plan and its energy usage and greenhouse gas emissions (GHG) emissions reduction strategies, and, therefore, would not consume energy resources in a wasteful, inefficient, or unnecessary manner. Less than significant impact would occur.

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

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

Discussion/Explanation:

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

Less Than Significant Impact: The proposed project includes infrastructure improvements to public transportation and pedestrian facilities for the purpose of traffic circulation and pedestrian access improvement. The project does not involve or introduce ongoing operational uses that would create a new source of energy consumption, and energy consumption would be only required during the construction phase. The proposed project's construction and maintenance methods would be consistent with state regulations referenced above and the goals and measures of the County's General Plan. Additionally, the project would be consistent with County plans including the Strategic Zero Net Energy Portfolio Plan, County Operations Strategic Sustainability Plan, Renewable Energy Plan, Zero Carbon Portfolio Plan, Strategic Plan to Reduce Waste, and Board Policy G-15, "Design Standards for County Facilities and Property" (County of San Diego Board Policy, 2023). Accordingly, the proposed project would

not conflict with or obstruct plans for renewable energy or energy efficiency and the impact would be less than significant.

VII. GEOLOGY AND SOILS

Would the project:

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

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

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

Discussion/Explanation:

No Impact: The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California or located within any other area with substantial evidence of a known fault. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

ii. Strong seismic ground shaking?

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. No buildings or structures are proposed as part of the project. Design and construction of the proposed improvements would be consistent with the applicable federal, state, and County codes and would not directly or indirectly result in potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. No impact would occur.

iii. Seismic-related ground failure, including liquefaction?

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

Discussion/Explanation:

Less Than Significant Impact: The extent of risk areas within the county with a potential for liquefaction hazard was mapped in the County's *Multi-Jurisdictional Hazard Mitigation Plan* (2004, revised in 2023) and incorporated into the County's Guidelines for Determining Significance for Geologic Hazards. According to the Web Soil Survey for San Diego County conducted by the United States Department of Agriculture's Natural Resources Conservation Service, the project site is located within a Potential Liquefaction Area. However, additional subsurface exploration would be conducted through engineering design and geotechnical evaluation of the project site. Accordingly, with the preparation of a site-specific engineering design, the project would comply with all federal, state, and local standards and requirements to minimize risk of potential liquefaction to ensure the project would not expose people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction.

Additionally, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site, therefore, impacts would be less than significant.

iv. Landslides?

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

Discussion/Explanation:

Landslide Susceptibility Areas were developed based on landslide risk profiles included in the County's *Multi-Jurisdictional Hazard Mitigation Plan* (2004, revised in 2023). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology. Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone.

Less Than Significant Impact: While sources vary on whether the project site is located within a "Landslide Susceptibility Area," the proposed project consists of improvements to existing public transportation and pedestrian facilities and does not propose any buildings or habitable structures. Additionally, the project does not require large-scale or significant grading activities. Proposed retaining walls and slopes paving would further stabilize the slopes against potential landslides and preventing potential runoff. Slopes under the existing two overpass bridges would be stabilized through either pavement or placement of rock in a mortar bed to prevent downslope runoff. Therefore, existing conditions would be improved with the proposed project and exposure of people or structures to potential adverse effects of landslides would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: According to the Soil Survey for the San Diego Area prepared by the U.S. Department of Agriculture, soils within the project site are identified as Riverwash, Tujunga sand (0 to 5 percent slopes), Visalia sandy loam (0 to 2 percent slopes), that have a soil erodibility rating of "low," and Vista coarse sandy loam (30 to 65 percent slopes) that has a soil erodibility rating of "high." However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes.
- A Storm Water Quality Management Plan (SWQMP) would be prepared. SWQMP would include BMPs to ensure sediment such as gravel bags, fiber rolls, hydroseeding, spill prevention and control, etc., does not erode form the project site.
- Proposed construction activities, including grading and excavation, are required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (Drainage – Erosion Prevention) and 87.417 (Planting). Compliance with these regulations would minimize the potential for water and wind erosion.
- Several retaining walls are proposed where grading cannot be achieved due to steep highway embankment slopes or adjacent roadways, which would also help to prevent potential runoff. Slopes under the existing overpass bridges would be stabilized through either pavement or placement of rock in a mortar bed to prevent downslope runoff.

For these reasons, the proposed project would not result in substantial soil erosion or the loss of topsoil that would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. The impact would be less than significant.

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The project proposes improvements to public transportation and pedestrian facilities and does not involve substantial grading or alteration of land. The key consideration is whether the project proposes buildings or habitable structures and whether they would be constructed on unstable soils. No buildings or habitable structures are being proposed as part of the project and the project site is not located in a fault rupture hazard zone. However, additional subsurface exploration would be conducted through the engineering design and geotechnical evaluation of the project site. Accordingly, with the preparation of a site-specific engineering design, the project would comply with all federal, state, and local standards and requirements to minimize risk of potential liquefaction to ensure the project would not expose people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. Therefore, the potential for impacts due to the implementation of the project would be low and less than significant impact would occur. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII (Geology and Soils) question (a) iii-iv listed above.

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

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

Discussion/Explanation:

Less Than Significant Impact: The project does not contain expansive soils, as defined by Table 18-I-B of the Uniform Building Code (1994). The soils on-site are Riverwash, Tujunga sand (0 to 5 percent slopes), Visalia sandy loam (0 to 2 percent slopes), and Vista coarse sandy loam (30 to 65 percent slopes). These soils have a shrink-swell behavior of low and do not represent a substantial risk to life or property. This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Natural Resources Conservation Service, dated December 1973. The impact would be less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

The project does not propose the use or installation of septic tanks or alternative wastewater disposal systems since no wastewater would be generated. No impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: Based on the geologic formations in San Diego County, levels of paleontological resource potential and sensitivity have been developed and are provided in the County's Guidelines for Determining Significance for Paleontological Resources. Specifically, paleontological resource potential ratings and sensitivity of geologic formations in San Diego County include formations in the county that are known to contain or have the potential to contain unique paleontological resources. Based on these maps and information on previously recorded fossil finds, geologic formations in San Diego County have been characterized as having High, Moderate, Low, Marginal, or No Potential for paleontological resource.

A review of these resources indicates that the project is located on quaternary alluvium, which has a low sensitivity rating for containing paleontological resources. A "low" resource potential and "low" sensitivity are assigned to geologic formations that, based on their relatively young age and/or high-energy depositional history, are considered to unlikely produce unique fossil remains. Low resource potential formations rarely produce fossil remains of scientific significance and are considered to have low sensitivity. Most of the unincorporated areas of San Diego County are underlain by geologic formations with no, low, or marginal paleontological resource potential and sensitivity and are unlikely to contain important fossils. Additionally, the project site does not contain any unique geologic features that have been listed in the California Department of Conservation and the County's Guidelines for Determining Significance for Unique Geology Resources, nor does the site support any known geologic characteristics that have the potential to support unique geologic features. Therefore, monitoring during construction excavation by a qualified paleontologist would not be required.

Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is essential in order to minimize potential impacts to unique paleontological resources. The following standard **minimization measures** would be implemented for inadvertent discoveries:

AMM-30. A monitoring program implemented by the excavation/grading contractor shall be required. Specifically, a Standard Monitor (any one person who is on the project site during all the original cutting of undisturbed substratum) shall be present during initial cutting, grading, or excavation of the substratum and given the responsibility of watching for fossils.

In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the DPW Resident Engineer and Environmental Services Unit shall be notified, and a Qualified Paleontologist shall be retained to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has:

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

AMM-31. If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented. If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter shall be submitted to the County Planning & Development Services identifying who conducted the monitoring and that no fossils were found. If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

Therefore, with the implementation of the above design features AMM-30 and AMM-31 during the project's excavation operations, potential impacts to paleontological resources would be avoided. Furthermore, the project would not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas would be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

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

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

Discussion/Explanation:

GHG emissions include carbon dioxide, methane, halocarbons, hydrofluorocarbons, and nitrous oxide, among others. Human-induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which contains two significance criteria for evaluating GHG emissions of a project. CEQA Guidelines, Section 15064.4, states that the "determination of the significance of GHG emissions calls for a careful judgment by the Lead Agency consistent with the provisions in Section 15064. A Lead Agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project."

Section 15064.4(b) further states that a Lead Agency should consider the following nonexclusive list of factors when assessing the significance of GHG emissions:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
- The extent to which project emissions exceed a threshold of significance that the Lead Agency determines applies to the project; and
- The extent to which the project complies with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation for GHG emissions.

State CEQA Guidelines do not provide numeric or quantitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of threshold significance up to the CEQA Lead Agency, with discretion to consider thresholds previously adopted or recommended by other public agencies or experts, provided that the Lead Agency's decision is supported by substantial evidence (CEQA Guidelines Sections 15064.7[b] and 15064.7[c]). Additionally, public agencies may also use an environmental standard as a threshold of significance, as it promotes consistency in significance determination and integrates environmental review with other environmental program planning and regulations (CEQA Guidelines Section 15064.7[d]). Further, CEQA Guidelines Section 15064(h)(1) states that "the lead agency would consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." A cumulative impact may be significant when the project's incremental effect, though individually limited, is cumulatively considerable.

Based on the specific characteristics of the proposed project, including its temporary construction-related GHG emissions, and the fact that the project would not result in an increase in operational emissions, the following impact analysis follows guidance consistent with California Air Pollution Control Officers Association's (CAPCOA) report called *CEQA & Climate Change* (CAPCOA 2008). CAPCOA developed a screening level of 900 metric tons of carbon dioxide equivalent (MT CO_2e) for determining whether further analysis of a project's GHG impacts is needed. Direct and cumulative impacts may be considered significant and require further analysis if a project results in emissions that exceed this screening level beyond current baseline emissions. This screening level was developed to demonstrate compliance with the statewide reduction targets in 2020. Subsequently, State Bill 32 (SB 32) set a GHG emission reduction target of 40 percent below 1990 levels by 2030. To achieve this target, a regression trajectory can be projected by reducing the emissions goal from the 900 MT CO_2e target in 2020 by the State's 40 percent reduced target, which would equate to a screening level of 540 MT

CO_2e in 2030. Therefore, 540 MT CO_2e is applied as the screening level currently used in place of the 900 MT CO_2e. The screening level does not indicate impact significance; rather, it is intended to be used to screen out smaller projects that do not generate substantial amounts of GHG emissions and allows regulatory and discretionary actions to focus on the more significant sources of GHG emissions. The County does not currently have locally adopted numeric screening criteria or GHG thresholds.

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. Potential impacts associated with GHG emissions generated by the proposed project are related to emissions from construction. Off-road equipment, materials transport, removal of spoils and/or debris, and worker commutes to and from the project site during construction of the proposed project would generate GHG emissions. Emissions from the proposed project would be limited to the construction activities and would not involve land use development that would generate long-term operational impacts. Emissions from construction would be minimal, temporary, and localized and would cease once the project is constructed. More information, including modeling assumptions, can be found in the *Greenhouse Gas Analysis for the Riverford Road Roundabouts Project* dated September 25, 2024.

Project construction is anticipated to last approximately one to two years. Construction is anticipated to involve the use of flatbed trucks, tractors, excavators, loaders, backhoes, dump trucks, drill rigs, paver, graders, skip loaders, rollers, jackhammer, lifts, forklifts, crane, scrapers, compactor, striping truck, concrete mixers, concrete trucks, asphalt trucks, and potentially a pneumatic hammer and/or a hydraulic splitter. The total quantity of soil cut for the project would be approximately 20,000 cubic yards (cy), some of which is anticipated to be retained onsite for embankment fill. Project construction phases include grubbing/land clearing, grading/excavation/concrete pouring, drainage/utilities/subgrade, and paving. Project construction would include the import of approximately 11,340 cubic yards of concrete and approximately 6,190 cubic yards of asphalt.

Project construction would also require import of aggregate base and asphalt concrete for the roadway, as well as either pavement or rock for the rock slope protection. This environmental analysis assumes approximately 7,490 total haul truck trips would be required during the entire project construction. The maximum number of workers during the peak construction period/stage is anticipated to be approximately 22 workers per day. During all other stages of construction, the number of workers would be less than 22.

Construction emissions were modeled using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Roadway Construction Emissions Model (RCEM) Version 9.0.1. The RCEM uses basic project information (e.g., construction duration, project type, project area) to estimate construction schedule and quantify exhaust emissions from heavy-duty construction equipment, haul trucks, and worker commute trips. Although RCEM was developed by SMAQMD, it is appropriate for use in San Diego as it is applicable for all statewide construction projects involving construction equipment subject to California Air Resources Board (CARB) construction emissions standards and incorporates statewide emission factor models

(EMFAC2017 and Off-Road). RCEM calculates fugitive dust, exhaust, and off-gas emissions from grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, paving, etc.

The total GHG emissions resulting from construction of the proposed project would be 3,011 $MTCO_2e$. Consistent with industry standard practices and based on guidance from the South Coast Air Quality Management District (SCAQMD), total construction GHG emissions resulting from a project proposing roadway infrastructure improvements should be amortized over 30 years, to account for their contribution to GHG emissions over the lifetime of a project/facility. As such, the amortized construction-related GHG emissions would be approximately 100 MT CO_2e per year, when amortized over the average lifespan of the proposed improvements (roundabouts, road pavement, sidewalks, retaining walls, etc.). Therefore, project-related GHG emissions would be well below the adjusted SB 32 threshold of 540 $MTCO_2e$ per year for construction. In addition, construction-related emissions would not continue to occur on an annual basis once construction ceases. Further, the project would improve operational efficiency around the SR-67/Riverford Road interchange, reduce overall vehicle idling, and, in turn, potentially reduce GHG emissions in the long-term. Thus, the proposed project would not generate GHG emissions, either directly or indirectly, in a way that would result in a significant impact on the environment.

A summary of the total estimated construction-related GHG emissions are listed in Table 4.

Table 4. Construction-Related GHG Emissions

Phase	GHG Emissions (MT CO_2e per Year)
Grubbing/Land Clearing	168
Grading/Excavation	1,918
Drainage/Utilities/Subgrade	609
Paving	316
Total	**3,011**
Amortized over 30 years	**100**

MT = metric tons, CO_2e = carbon dioxide equivalents
Detailed modeling outputs provided in Greenhouse Gas Analysis for the Riverford Road Roundabouts Project, San Diego County, CA, dated January 19, 2024, Attachment A.

Further, as explained in more detail in the *Riverford Road Roundabouts – VMT Assessment* dated September 25, 2024 prepared by LLG, the proposed project seeks to improve interchange traffic mobility without increasing roadway capacity. The project would also enhance multimodal connectivity by constructing shared-use pedestrian and bicycle pathways/sidewalks and creating bicycle lanes. Rather than generating new vehicle trips, the project promotes active modes of transportation and, therefore, would not substantially increase (in fact, may decrease) operational emissions relative to existing conditions. Because the proposed project would not result in additional vehicular traffic and the project's incremental contribution to cumulative GHG emissions would not be cumulatively considerable, the impact would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: In 2006, the state passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill 32 (AB 32), which set the GHG emissions reduction goal for the State of California into law. The law requires that, by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources through regulation, market mechanisms, and other actions. AB 32 directed the CARB to prepare and approve a Scoping Plan to achieve the maximum technologically feasible and cost-effective GHG emissions reductions from sources or categories of sources of GHGs by 2020 and to update the Scoping Plan every 5 years. The latest Scoping Plan, California's 2022 Climate Change Scoping Plan (2022 Scoping Plan), draws from the previous plans to present strategies to reaching California's 2030 GHG reduction target and identifies a technologically feasible, cost-effective path to achieve carbon neutrality and reduce GHG emissions by 85 percent by 2045, as directed by Assembly Bill 1279, the California Climate Crisis Act.

While the 2022 Scoping Plan updates do include measures that would indirectly address GHG emissions associated with construction activities, including phasing in cleaner technology for diesel engine fleets (including construction equipment) and low-carbon fuel standard, successful implementation of these measures predominantly depends on the development of laws and policies at the state level. As such, none of these statewide plans or policies constitute a regulation to adopt or implement a regional or local plan for reduction or mitigation of GHG emissions. In addition, it is assumed that any requirements formulated under the mandate of AB 32 and SB 32 would be implemented consistent with statewide policies and laws.

Further, consistent with the 2022 Scoping Plan strategies for increasing waste diversion from landfills as well as the County of San Diego General Plan Policy COS-17.2, which requires recycling, reduction, and reuse of construction and demolition debris, the proposed project would comply with the County's Construction & Demolition Ordinance for proper processing and handling of construction and demolition debris generated by construction and, thus, would not conflict with the 2022 Scoping Plan strategies or the County's General Plan. The County contractors would also be encouraged to use low-emission construction vehicles per General Plan Policy COS-14.10, which would also be consistent with the 2022 Scoping Plan's actions for the construction equipment sector.

The project was also evaluated for consistency with the San Diego Forward, which is the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that demonstrates how the region would meet its transportation related GHG reduction goals. The RTP/SCS focuses on the five main strategies, referred to as the 5 Big Moves, that would result in a more efficient transportation system. The project would be consistent with RTP/SCS because the project would improve traffic flow within the SR-67/Riverford Road interchange, thereby potentially resulting in a decrease in mobile source GHG emissions when compared to existing conditions. More information can be found in the *Greenhouse Gas Analysis for the Riverford Road Roundabouts Project* (2024).

Further, the project would be consistent with the County's General Plan goals and policies related to transportation and conservation. Specifically with the Mobility Element and Conservation and Open Space Element goals and policies M-3 – M-5, M-9, M-11, and COS-16.

The proposed project would comply with statewide targets and regional regulations for GHG emissions reductions because it involves improvements to an existing public transportation infrastructure in the same or similar capacity as its existing use. As explained above, the project would improve operational vehicle efficiency within and around a highway interchange, which would enable more efficient roadway and intersection operations and safety in the long-term without changing the traffic carrying capacity of the study area. Additionally, the project would improve connectivity, access, and safety for active transportation users, including pedestrians and bicyclists, which is consistent with statewide goals of minimizing impacts of climate change and providing active transportation choices.

Last, the project would not result in additional vehicular traffic and the project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds. Thus, the proposed project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions and the impact would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: Construction of the proposed project would involve the as-needed use of limited amounts of potentially hazardous materials, including but not limited to solvents, fuels, oils, and transmission fluids associated with construction vehicles and equipment. However, materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), EPA, and Occupational Safety and Health Administration (OSHA). Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Operation of the project would be limited to routine maintenance activities that would not involve the use of hazardous substances. The project would not create a significant hazard to the public or the environment because it does not propose storage, use, transport, emission, or disposal of hazardous substances, nor are hazardous substances currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures that are known to contain hazardous materials on site and, therefore, would not create a hazard related to the release of hazardous materials from demolition activities. However, unanticipated

hazardous materials may be encountered during construction. All potentially hazardous materials would be tested, handled, and disposed of in accordance with County's and Caltrans' policies and guidelines, as well as other applicable hazardous materials laws and regulations.

Lead-based paint could be potentially present within the project site, such as in roadway stripings, which may be removed and restriped as part of construction. This could potentially cause a release of lead-contaminated dust or result in disturbance of lead-contaminated soils. However, according to the *Phase I Environmental Site Assessment* (Phase I Report) dated March 27, 2024, prepared by Ninyo & Moore, this potential hazard to construction workers and the public is considered minimal, and with the implementation of appropriate federal, state and local hazardous materials BMPs during demolition or construction activities, no significant impact would occur. Additionally, treated wood may be encountered within the project site and is considered hazardous if it contains elevated levels of arsenic, chromium, copper, pentachlorophenol, and/or creosote. If these constituents are present in treated wood, over time they may have contaminated soils onsite or may be released during construction as dust or otherwise. According to the Phase I Report, the impact from removal or disturbance of treated wood would be considered minimal and with the implementation of appropriate BMPs, the impact would be less than significant.

Aerially Deposited Lead (ADL) soil testing and study would be performed prior to construction, and an ADL report would be prepared. If ADL is present, appropriate requirements and/or recommendations for properly addressing contaminated soils, if determined to be present within the PIA, would be provided. If contaminated soils are present within the project site and would be disturbed during construction, no significant impact would occur as contaminated soils would be tested, handled, and disposed of in accordance with the County's and Caltrans' policies and guidelines, as well as other applicable hazardous materials laws and regulations. For Caltrans' right-of-way, the 2016 Soil Management Agreement (DTSC 2016) between Caltrans and DTSC for ADL-contaminated soils may be used, if applicable. Any ADL study recommendations, if provided, would be included in the project construction contract documents for contractor to implement. With the implementation of potential ADL study requirements or recommendations, as well as the above-said policies, guidelines and other applicable laws and regulations, any potential impacts would be less than significant.

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?

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

Discussion/Explanation:

Less Than Significant Impact: As previously discussed in Section IX(a) (Hazards and Hazardous Materials), construction of the proposed project would involve as-needed temporary use of potentially hazardous materials, including but not limited to solvents, fuels, oils, and transmission fluids. Project operation would involve continued use of the existing SR-67/Riverford Road interchange and is not anticipated to involve use of or encounter of hazardous substances. Storage, handling, and disposal of hazardous materials during project

implementation would comply with applicable standards and regulations established by the DTSC, EPA, and OSHA. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. In addition, the project does not propose to demolish any existing structures on site and, therefore, would not create a hazard related to the release of asbestos, lead-based paint, or other hazardous materials from demolition activities. Additionally, as addressed in response to question (a), any existing onsite materials or potentially contaminated soils containing lead-based paint, treated wood or ADL soils would be handled and disposed of in accordance with the applicable laws and regulations. Therefore, the proposed project would not result in a significant hazard to the public or the environment through a reasonably foreseeable upset or accident condition related to the release of hazardous materials and the impact would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project site is located approximately one-quarter mile to the northwest of an existing River Valley High School. Project construction would involve as-needed temporary use and handling of limited amounts of potentially hazardous materials, including but not limited to solvents, fuels, oils, and transmission fluids associated with construction vehicles and equipment. However, materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the DTSC, EPA, and OSHA. Additionally, as addressed in response to question (a), any existing onsite materials or potentially contaminated soils containing lead-based paint, treated wood or ADL soils would be handled and disposed of in accordance with the applicable laws and regulations, as discussed in question (a).

Therefore, due to the strict requirements that regulate hazardous substances outlined above, and the fact that the initial planning, ongoing monitoring, storage, handling, transport, emission and disposal of hazardous substances would occur in compliance with local, state, and federal regulations, the project would result in less than significant impacts related to emission and handling of hazardous substances within one-quarter mile of an existing school.

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

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

Discussion/Explanation:

No Impact: Based on a site visit and regulatory agencies' database searches and records review, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to California Government Code, Section 65962.5; San Diego County Hazardous Materials Establishment database; San Diego County Department of Environmental Health & Quality (DEHQ) Site Assessment and Mitigation Case Listing; Department of Toxic Substances Control Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database); Resource Conservation and Recovery Information System listing; EPA's Superfund Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database; or EPA's National Priorities List.

The project site borders a facility listed in the State Water Resources Control Board's (SWRCB) GeoTracker database as a closed unauthorized release/cleanup case (H06670-002) associated with the address 9891 Riverford Road and which is located along the northern edge of the proposed project site. A review of available records shows the property appears to be associated with the Lakeside Land Company/Woodward Sand Pit property and is listed in the California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS) database as an inactive land reclamation operation associated with former sand pit mining operations. According to the listing, the Lakeside Land Company was established to accept inert debris (broken concrete, asphalt, rock, and clean dirt) to be used as engineered fill. Permitted land reclamation activities occurred from 2010 to 2016 on approximately 70 acres north of this property, across the San Diego River. The Lakeside Land Company confirmed completion of closure activities associated with the reclamation project in June 2016. The area was excavated to an average depth of 325 feet above mean sea level and backfilled with fill. Based on the completion of reclamation activities and regulatory oversight, this listing is not a Recognized Environmental Conditions (REC), and the proposed project would not construct within or otherwise impact this site.

Additionally, a review of DEHQ records, SWRCB's GeoTracker, and DTSC's EnviroStor databases revealed the proposed project site is also adjacent to another facility that is listed in additional hazardous materials databases. Holland Motor Homes dba Holland RV Center is located at 11510 Woodside Avenue, Suite H, Santee, CA and this property is listed in the CalEPA Regulated Site Portal Data (CERS) database, Hazardous Materials Management Division (HMMD) database, and had routine DEHQ inspections conducted from 2015 to 2022. According to DEHQ records, violations for this property were issued for improperly labelled hazardous waste containers, failure to update the site map, inadequate employee training records, and failure to dispose of accumulated hazardous wastes in a timely manner. In each instance, corrective measures were taken by the business owner, and the facility returned to compliance. Based on ongoing regulatory oversight, this listing is not considered a REC, and the proposed project would not construct within or otherwise impact this site.

The proposed project does not involve construction of structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historical burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site, does not contain a leaking Underground Storage Tank**,** and is not on a site with the potential for contamination

from historical uses, such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment and no impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: The project site is located within the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) Influence Area 2, which requires limits on structure heights and recording of overflight notification. The project site is also within the Federal Aviation Administration's (FAA) Height Notification Surface. However, the project does not propose construction of structures equal to or greater than 150 feet in height (as dictated by the ALUCP for imaginary air surfaces), constituting a safety hazard to aircraft and/or operations from an airport or heliport. While construction equipment may include the use of a crane to build retaining walls and potentially other project components, crane operations would occur in compliance with the FAA's height restrictions for Airport Influence Area 2. Therefore, the project would not constitute a safety hazard for people residing or working in the project area and the impact would be less than significant.

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

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

Discussion/Explanation:

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

i. Operational Area Emergency Plan And Multi-Jurisdictional Hazard Mitigation Plan:

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

each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas.

The proposed project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with the Emergency Response Plan or Emergency Evacuation Plan. During the short-term construction activities, the project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the project site. Temporary detours due to a potential full closure of both or either intersection of the SR-67/Riverford Road interchange may occur; however, an alternative emergency route would be available at all times to residents, businesses, and emergency vehicles. The project would not interfere with the Emergency Response Plan or Emergency Evacuation Plan and would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out; therefore, the impact would be less than significant.

ii. San Diego County Nuclear Power Station Emergency Response Plan

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

iii. Oil Spill Contingency Element

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline. In addition, the only use of oil required for the construction or operation of the proposed project would be associated with the temporary use of construction and maintenance equipment and vehicles accessing the site. No impact would occur.

iv. Emergency Water Contingencies Annex and Energy Shortage Response Plan

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

v. Dam Evacuation Plan

Less Than Significant Impact: According to the California Department of Water Resources, the project is located within a Dam Inundation Zone for Chet Harritt Dam, Cuyamaca Dam, El Capitan Dam, and San Vicente Dam. However, the project would not interfere with the Dam Evacuation Plans because the project is not a “unique institution” that would be difficult to safely evaluate in the event of a dam failure. “Unique institutions,” as defined by the Office of Emergency Services, include hospitals, schools, skilled nursing facilities, retirement homes, mental health care facilities, care facilities for patients with disabilities, adult and childcare facilities, jails/detention facilities, stadiums, arenas, amphitheaters, or a similar use. Since the project involves improvements to an existing highway interchange and does not propose a

"unique institution" in a dam inundation zone, the project would not impair implementation of or physically interfere with the implementation of an emergency response plan. As such, the project would result in a less than significant impact.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project is largely surrounded by urbanized and built areas with no wildlands adjacent or nearby that are susceptible to fire. The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project does not involve construction of facilities or structures that may interfere with public access to fire escape routes. The project is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires.

According to California Department of Forestry and Fire Protection's (CAL FIRE) Fire Zone Map Viewer (2023) and Fire Hazard Severity Zones (2024), the project site is not located in Fire Hazard Severity Zones. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland urban interface locations. Developments within or adjacent to areas designated as Very High Fire Hazard Severity Zones and/or wildland-urban interface areas have the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds because these conditions contribute to the spread of and make it more difficult to contain wildfires. However, the proposed project consists of improvements to existing public transportation and pedestrian facilities and no new above-ground building structures would be constructed that could exacerbate fire risk.

Although intersections of the main roads within the project site – Riverford Road and Woodside Avenue – would be temporarily closed to traffic periodically or for a period of time during construction, detours via the SR-67/Winter Gardens Blvd. interchange, Channel Road, and Riverside Drive would be available at all times. Therefore, traffic flow, access to homes and businesses, and emergency access would be maintained throughout construction duration.

In addition, proper BMPs would be implemented to prevent a fire on the project site due to construction activities and removal of small portions of vegetation within the project site to accommodate project construction. Additionally, the project would comply with the California Fire Code, regulations set forth in Sections 13000 et seq. of the California Health and Safety Code, Title 14, Division 1.5, of the California Code of Regulations, County ordinances, and the County Consolidated Fire Code.

Therefore, based on the location, type of project and construction activities, the project would not expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires. The impact as a result of project implementation would be less than significant.

X. HYDROLOGY AND WATER QUALITY

Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features, beneficial to improving water quality of San Diego River, and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

The project is required by the County's "Best Management Practices Design Manual" to implement the following construction BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff: gravel bags, fiber rolls, spill prevention and control, concrete waste management, solid waste management, and sanitary waste management. These measures would enable the project to meet waste discharge requirements as required by the regional Municipal Separate Storm Sewer Systems Permit (San Diego Regional Water Quality Control Board (SDRWQCB) Order No. R9-2013-0001 as amended by Order Nos. R9-2015-001 and R9-2015-0100), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and BMP Design Manual (BMP DM).

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

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

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

Discussion/Explanation:

No Impact: The project would not use groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge for reasons including but not limited to the following: the project does not involve regional diversion of water to another groundwater basin or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact to groundwater resources is anticipated.

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 surface, in a manner which would:

i. result in substantial erosion or siltation on- or off-site;

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

Construction of the proposed water quality features would involve construction activities, such as surface grading and trenching, that may temporarily alter drainage patterns. However, these activities would be temporary and construction BMPs would be implemented as part of the SWQMP for the project. Additionally, the project would implement construction BMPs to reduce potential pollutants from entering storm water runoff to the maximum extent practicable, such as: gravel bags, fiber rolls, spill prevention and control, concrete waste management, solid waste management, and sanitary waste management. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the San Diego Regional Municipal Stormwater Permit (SDRWQCB Order No. R9-2013-0001, amended by R9-2015-0001 and R9-2015-0100; NPDES No. CAS0109266), as implemented by the County's JURMP and BMP DM.

The SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The County's DPW would ensure that the SWQMP is implemented as proposed. Accordingly, it has been found that the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation would be controlled within the boundaries of the project, the project would not contribute to a cumulatively considerable impact. For further information on soil

erosion, refer to Section VII(b) (Geology and Soils). Because erosion and sedimentation would be controlled within the boundaries of the project, the project would not contribute to a cumulatively considerable impact.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project includes construction of water quality improvement features and stormwater drainage elements. The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons:

- Water quality improvement features, two of which would be biofiltration/bioretention basins, would be designed to filter stormwater contaminants prior to flows being released into the stormdrain system. This would also help to offset the quantity of new impervious surfaces added as part of project's paving needs.
- New curb cuts, gutters, storm drain inlets, ditches, headwalls, channels, and sidewalk underdrains would be constructed and tie into the existing drainage system to convey stormwater to the proposed water quality treatment features, where stormwater would be treated before being released into the existing stormdrain system. Existing drainage patterns, including existing outlets to the San Diego River, would be maintained.

Further, operation of the proposed project would not change from existing uses and would not result in additional sources of polluted runoff. During construction, erosion and sediment control BMPs identified in the Stormwater Pollution Prevention Plan (SWPPP) of the State of California Construction General Permit, would substantially reduce the amount of soil disturbance, erosion, and sediment transport into receiving waters and pollutants in potential site runoff.

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

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. Because some of the project components involve paving and placement of impervious surface, County DPW would follow the latest adopted version of the County's "Best Management Practices Design Manual" (Manual) which provides guidance for land development and public improvement projects to comply with the most current San Diego Regional Municipal Stormwater Permit. With the implementation of necessary BMPs in accordance with the Manual, the project would not contribute to substantial amounts of runoff.

Construction and post-construction activities would be required to adhere to various federal, state, and regional water quality standards. During construction, erosion and sediment controls identified in the SWPPP, under the SWRCB's General Construction Stormwater Permit, would substantially reduce the amount of soil disturbance, erosion and sediment transport into receiving waters, and pollutants onsite runoff during construction. Operation of the proposed project would not change from current operations and would not result in additional sources of polluted runoff. Therefore, the proposed project would not create or contribute to water runoff that would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

iv. impede or redirect flood flows?

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The proposed project is not located within a mapped Federal Emergency Management Agency's floodplain zone. Although FEMA floodplain zone AE, which is associated with the San Diego River, is adjacent to the project site, the project would not encroach into the floodplain or within any other floodplain or floodway zone. Additionally, no buildings are proposed as part of the proposed project that could impede or redirect flood flows. Retaining walls would be built to stabilize road cuts and slopes along existing topography within the project; however, none of the retaining walls are proposed within a floodplain and would not be built in a way that would impact flood waters. Landscaping and water quality improvement features would consist of native species, similar to the surrounding habitat, and would be permeable to flood flows. Therefore, the project would not impede or redirect flood flows and no impact would occur.

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

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

Discussion/Explanation:

No Impact: The project site is not located in a floodway or flood plain and, therefore, could not be inundated by a flood hazard. The project site is not located along the shoreline or a lake or reservoir; therefore, could not be inundated by a seiche. The project site is located approximately 18 miles east of the coast; therefore, in the event of a tsunami, would not be inundated. The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. Moreover, the project would not contribute to a cumulatively considerable risk of release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones, as detailed above. No impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. As described in Section X(c)(i) (Hydrology and Water Quality), a SWQMP would be prepared, and the project would implement construction BMPs to reduce potential pollutants from entering storm water runoff to the maximum extent practicable, such as: gravel bags, fiber rolls, spill prevention and control, concrete waste management, solid waste management, and sanitary waste management. Additionally, the project would not conflict with or obstruct implementation of a Water Quality Improvement Plan for the San Diego River watershed region and, according to the County's Planning and Development Services' Sustainable Groundwater Management website (2024) and the San Diego County Water Authority's Local Water Supplies, Groundwater website (2024), no sustainable groundwater management plan has been prepared for this area.

Additionally, the Watershed Protection Ordinance (WPO) has discharge prohibitions and requirements that vary depending on the type of land use activity and location in the County. Each project subject to the WPO is required to prepare a Stormwater Management Plan (SMP) that details a project's pollutant discharge contribution to a given watershed and propose BMPs

or design measures to mitigate any impacts that may occur in the watershed. An SMP would be prepared for this project.

Therefore, the proposed project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and the impact would be less than significant.

XI. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project does not propose the introduction of new infrastructure that could physically divide an established community such as major roadways, water supply systems, or utilities to the area. Therefore, the proposed project would not significantly disrupt or divide an established community. No impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

As a transportation improvement project, the proposed project would be consistent with the County's General Plan Mobility Element as the project would not significantly change the community's roadway network or its components, ensuring consistency with the network (i.e., vehicles movement/mobility, speed, location, etc.). The segments of Riverford Road within the project site are designated under the Mobility Element as Prime Arterial and Major Road, and these designations would not change with the proposed project. The project would also address one of the Mobility Element's goals of enhancing safety and efficiency of operations within a

portion of this area's transportation network by improving traffic circulation and reducing vehicle speeds. Therefore, the project would not conflict with the adopted Mobility Element.

Additionally, the proposed project is located within the unincorporated community of Lakeside, which is guided by the Lakeside Community Plan (2011). The plan identifies several Resource Conservation Areas, which are lands that require special attention to conserve resources in a manner best satisfying public and private objectives. A Resource Conservation Area (Rattlesnake Mountain) is located 0.8 miles south of the project site and would not be impacted by the proposed project.

Regarding construction of retaining walls, the Lakeside Design Guidelines encourages walls to be faced with local stone or treated to mimic earth-colors and textured concrete. As discussed in Section I (Aesthetics) questions (a) and (c), the proposed project includes construction of several retaining walls that would utilize aesthetic treatment using form liners to develop patterns and texture to mimic existing conditions. A large retaining wall proposed along the south edge of the project would range in height between 8 to 25 feet, with a length of approximately 625 feet. This wall would resemble the appearance of indigenous soils and minor boulders found along this slope. The wall would have a natural 'boulder' finish with staining and texturing, along with an appropriate wall-ends transition to existing landscape and, thus, would integrate with the existing rural valley character of the area.

Other proposed improvements would also be consistent with the Lakeside Community Plan design standards, as the proposed roundabouts, sidewalk, multi-use pathways, drainage facilities, beyond gore paving, etc. would utilize appropriate aesthetic treatments and design features to effectively "blend in with the natural terrain and minimize urban improvements" (policy #2). The proposed water quality treatment features and revegetation would "provide for street tree planting and landscaping, as well as preserve indigenous plant life" (policy #5), "open space areas…[and] steep slopes" (policy #4). Trees are proposed within the center of the roundabouts, within biofiltration basins and in other areas. Native shrubs and grasses are also proposed as part of site revegetation. Therefore, the project would be consistent with both policies.

Therefore, the project would "preserve the rural atmosphere of the community" and be consistent with the General Plan and Lakeside Community Plan's policies and goals. The project does not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and the impact would be less than significant.

XII. MINERAL RESOURCES

Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: According to the California Department of Conservation, Mineral Lands Classification (2022), the proposed project site is within the Surface Mining and Reclamation Act (SMARA) Study Area SR-153, SR-240, and OFR-9604. According to the California Department of Conservation, "CGS Information Warehouse: Mineral Land Classification" mapping application, the project site is located in an area where mineral resources are known to be present (Mineral Resource Zone; MRZ 2). However, the project site and surrounding area is heavily developed and is subject to public transportation facility, commercial, and residential land uses which are incompatible with mining operations of mineral resources. A future mining operation within the project area would likely create significant impacts to neighboring properties and businesses in terms of noise, air quality, traffic, and other potential impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource of value, since, due to incompatible land uses, the likelihood of mineral resources extraction is already low to none. Less than significant impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: As stated in response to question (a) above, the project site is located in an area designated as Mineral Resource Zone (MRZ 2; resource present). However, land uses within and surrounding the project site include public transportation facilities, commercial, and residential uses, which are incompatible with the extraction of mineral resources. Potential future mining operations at the project site would likely create significant impacts to neighboring properties for noise, air quality, traffic, and other issues, thereby reducing the feasibility of future mining operations regardless of the proposed project. Therefore, no potentially significant loss of availability of a known mineral resource of a locally important mineral resource recovery (extraction) site, delineated on a local General Plan, Specific Plan or other land use plan, would occur as a result of this project. Less than significant impact would occur.

XIII. NOISE

Would the project result in:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes.

The land uses surrounding the site include public transportation facilities, commercial, and residential land uses. The project does not propose to add additional lanes and would not add any additional average daily traffic (ADT) volumes; therefore, the project would have no traffic noise impacts on sensitive receptors.

Construction activities would involve a number of different operations and equipment, including but not limited to earthwork, using an excavator, loading and hauling material with an excavator, a bulldozer, trucks, rock removal equipment, potential rock removal by blasting, crane operations (e.g. for retaining walls), roadway pavement removal and repaving machinery, and other general construction activities and equipment. Construction noise levels would be temporary and intermittent during the approximately one to two years of project construction. Construction noise would not exceed County noise level standards for construction activities. The project would not expose people to potentially significant noise levels that exceed the allowable limits in the County's General Plan, County's Noise Ordinance, and other applicable noise limits for the following reasons.

General Plan – Noise Element
The County's General Plan, Noise Element Tables N-1 (Noise Compatibility Guidelines) and N-2 (Noise Standards) address noise-sensitive areas and require an acoustical study to be prepared for any use that may expose noise-sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels A (dBA)[8] CNEL for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). If a project produces noise in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to reduce noise levels. Noise-sensitive areas include residences, hospitals, schools, libraries or similar facilities. Based on staff's review of projected County road, air, and rail noise contours of the County's Geographic Information System mapping application tool, proposed project implementation is not expected to expose existing or planned noise-sensitive areas to new roads, airport, heliport, railroad, industrial or other noise in excess of 60 dBA CNEL or 65 dBA CNEL. Additionally, the project would not create any noise-sensitive land uses. The project consists of improvements to existing public transportation and pedestrian facilities and is not anticipated to create sources of noise, other than during construction, nor cause ongoing operational noise-generating activity in addition to or in excess of existing noise levels. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits under the County's Noise Element.

[8] dBA is A-weighted sound pressure level. Some frequencies of noise are more noticeable than others. To compensate for this, different sound frequencies are weighted more heavily (A-weighted) so that the response of the average human ear is simulated (County Guidelines for Determining Significance, Noise, 2009).

Noise Ordinance – Section 36.404 (Operation)

Operational noise generated by the project is not expected to exceed the standards of the County's Noise Ordinance Section 36.404 beyond the project site's limits or beyond existing ambient noise levels. Portions of the project site and parts of adjacent properties are zoned S94 (Transportation and Utility Corridor), S88 (Specific Plan), C36 (General Commercial), and RR (Rural Residential), all of which range in one-hour average sound limits between 50 and 60 dBA for the hours of between 7 a.m. and 10 p.m. Based on the County's staff review, operationally, the proposed project would not exceed these one-hour averages or existing ambient noise levels (whichever is greater) because the project does not propose noise-generating structures, equipment, developments, or otherwise noise-generating sources. The project involves traffic circulation and operational improvements within the SR-67/Riverford Road interchange, which is expected to reduce vehicle queues on the roadways and SR-67 ramps and, as a result, is expected to reduce overall noise levels created by idling of on-road transportation. Therefore, the project would not exceed the existing County standards or ambient noise levels at the adjoining property lines or differ operationally from existing conditions.

Noise Ordinance – Section 36.408 - 36.410 (Construction)

Construction noise levels are not anticipated to exceed the County's average construction noise levels of 75 dBA for an eight-hour period during the daytime hours beyond the project site limits. However, the project may conflict with the County's Noise Ordinance Section 36.408, which does not allow construction between 7 p.m. and 7 a.m. Nighttime construction between 7 p.m. and 7 a.m. may be necessary, primarily, to minimize closures of the SR-67/Riverford Road interchange intersections during the day, as well as for the safety of the drivers, pedestrians, and construction workers. Nighttime construction could include activities such as earthwork, hauling of material, rock breaking, pavement removal, paving, concrete pouring, crane operations, etc. No blasting activities would occur at night. Typical construction equipment would include excavator, jack hammers, backhoes, forklifts, graders, front-end loaders, drill rig, dump trucks, compactors, generators, compressors, etc. Road paving typically includes rollers, pavers, loaders, and haul trucks. To comply with the County's Noise Ordinance, DPW would obtain a noise variance permit from the County's Noise Control Officer, as defined and required by Section 36.423 of the County Code. DPW would also work with the Noise Control Officer to identify ways to further minimize nighttime noise generated by construction equipment. A noise variance and any associated noise-attenuating measures would bring the proposed project into compliance with the County's Noise Ordinance Section 36.408.

Finally, the project's conformance to the County's General Plan Noise Element and County's Noise Ordinance Section 36-404 and 36.408 – 36.410 ensures the project would not create cumulatively considerable noise impacts because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the construction site limits, derived from State regulation to address human health and quality of life concerns. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local General Plan, Noise Ordinance, and applicable standards of other agencies. Impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

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

Also, the project does not propose any major new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. No impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project is located within the ALUCP for Gillespie Field Airport; however, the project is not located within the airport's designated noise contours. Additionally, the project does not propose a change to any existing land use designation, and the proposed transportation and pedestrian facilities' improvements would be consistent with the Airport Land Use Commission's consistency determinations for Gillespie Field. Lastly, the project includes improvements to public transportation and pedestrian facilities, and no residential, commercial, or industrial facilities would be built as part of the project. Therefore, the project would not expose people residing or working in the project area to excessive noise levels and the impact would be less than significant.

XIV. POPULATION AND HOUSING

Would the project:

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The proposed project would not induce population growth in the Lakeside or Santee area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth such as: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, Specific Plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

Project improvements are proposed at existing public transportation and pedestrian facilities. The proposed project would not contribute to a significant increase in travel times, increase roadway capacity along the SR-67 corridor, or lead to land development/population growth along the corridor because land along Riverford Road, Woodside Avenue, and North Woodside Avenue is built out, protected through Biological Open Space Easements, or would require major rezoning. Therefore, it is unlikely the proposed project would lead to growth within the project area or induce population growth and, therefore, no impact would occur.

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

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

Discussion/Explanation:

No Impact: The proposed project would not displace any existing housing since the proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. As such, the

proposed project would not displace substantial numbers of existing people or housing, and no impact would occur.

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 service ratios, response times or other performance objectives for any of the public services:

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project would not require new, nor would it alter existing public services or facilities. Additionally, the project would not change public services ratios or emergency services response times. The project does not involve construction of new or physically-altered governmental facilities, such as: fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance ratios or objectives for public services. The project is intended to improve traffic circulation at the SR-67/Riverford Road interchange and multimodal connectivity in the area. Therefore, the project would not have an adverse physical effect on the environment because no new services or significant alteration of existing services or facilities is proposed. No impact would occur.

XVI. RECREATION

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project does not propose any residential uses, including but not limited to a residential subdivision, mobile home park, or single-family residences that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Therefore, no significant increase in the use of existing neighborhood, regional parks, nearby trails, or other recreational facilities is anticipated.

The addition of Class II bicycle lanes and shared-use pathways would provide pedestrian facilities and multimodal connectivity along parts of Riverford Road, Woodside Avenue, North Woodside Avenue, and within the SR-67/Riverford Road interchange overall. Although there is no direct connectivity between the proposed project and the San Diego River Park Regional Trail (SD River Trail) located nearby, construction of shared-use pathways and bicycle lanes would improve access to SD River Trail and the Walker Preserve Trail. However, any potential increase in the use of these recreational facilities is anticipated to be less than significant and the project would be consistent with the County's Community Trails Master Plan and the associated Lakeside Community Trails and Pathways Plan. The impact would be less than significant.

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

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

Discussion/Explanation:

No Impact: The project does not include construction of recreational facilities or require expansion of recreational facilities. The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. Therefore, proposed project would not increase the use of or necessitate construction of new or expansion of existing recreational facilities and no impact would occur.

XVII. TRANSPORTATION

Would the project:

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

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

Discussion/Explanation:

Applicable plans and policies for unincorporated areas of San Diego County include: the County General Plan Mobility Element (2011), County Transportation Study Guidelines (2022), the County Community Trails Master Plan (2005), and the County Active Transportation Plan (2018).

No Impact: The proposed project includes construction of two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would be consistent with the County's General Plan Mobility Element as the project would not significantly change the community's roadway network or its components (i.e., vehicles movement/mobility, speed, and location). The segments of Riverford Road within the project site are designated under the Mobility Element as Prime Arterial and Major Road, and these designations would not change with the proposed project. The proposed project would also be consistent with the County's Transportation Study Guidelines (2022), as roundabouts would not lead to a substantial or measurable increase in vehicle travel within or around the SR-67/Riverford Road interchange. Last, the project is consistent with the County's Active Transportation Plan's (2018) main objectives of: 1) improving safety by constructing sidewalks and crosswalks to help reduce potential auto collisions with cyclists and pedestrians; 2) increasing accessibility and connectivity within an active transportation facility through proposed construction of pedestrian facilities which would also connect residential, commercial, and industrial areas located on the opposite sides of the SR-67/Riverford Road interchange; and 3) improving public health by encouraging walking and biking.

Proposed improvements would occur within the footprint of existing public transportation and pedestrian facilities. No additional lanes or increases in roadway capacity are proposed, and no additional motor vehicle trips or changes to the surrounding traffic circulation system are expected. Vehicle trips from operation-related maintenance activities would be intermittent, not be considered substantial, and would occur sporadically.

As part of construction, the project would temporarily increase vehicle trips to and from the project site as a result of construction personnel's commute. However, construction would be short-term, temporary, and any temporary roadway detours would not cause an interruption in the larger circulation system or on nearby roadways. If roadway closures are required, their effects could be minimized through nighttime construction work, if necessary. Therefore, the proposed project would not conflict with a program, plan, ordinance or a policy addressing the circulation system and no impact would occur.

b) Conflict or be inconsistent with CEQA Guidelines section § 15064.3, subdivision (b)?

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

Discussion/Explanation:

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including a new Section 15064.3. Under the new Section 15064.3, Vehicle Miles Traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts." As of July 1, 2020, all CEQA Lead Agencies must analyze a project's transportation impacts using VMT. For purposes of this analysis, VMT refers to the amount and distance of automobile travel attributable to a project. Additionally, County Transportation Study Guidelines (County Guidelines; 2022) and State Bill 743 legislation, as addressed by the Office of Planning and Research (OPR) in its 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR's Technical Advisory), provide guidance as follows.

Less Than Significant Impact: The proposed project includes constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, new SR-67 on- and off-ramp legs, and water quality treatment features. The purpose is to improve traffic circulation and operational efficiency within several roadways and intersections of the SR-67/Riverford Road interchange within County's and Caltrans' right-of-way, while preserving existing roadways and maintaining current roadways' capacity.

For transportation projects, any project that results in an increase in additional capacity (i.e., constructing additional vehicle travel lanes on an existing roadway) has the potential to increase vehicle travel, referred to as "induced vehicle travel". The County Guidelines provide a VMT screening list for transportation projects that do not typically cause substantial or measurable increases in VMT and are presumed to have a less than significant impact on transportation. According to the OPR's Technical Advisory and County Guidelines, the following relevant transportation projects are presumed to have a less than significant impact on transportation and traffic:

- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way.

To support the determination that the above-listed project features – the roundabouts and bike and pedestrian facilities – would have a less than significant impact, an assessment by the County's consultant LLG was prepared. The main purpose was to determine if OPR's Technical Advisory and County Guidelines' determination that roundabouts are unlikely to lead to a substantial or measurable increase in vehicle travel would hold for the proposed project. The results are documented in the *Riverford Road Roundabouts – VMT Assessment* dated September 25, 2024, prepared by LLG.

According to the OPR's Technical Advisory and County Guidelines, the following five key criteria were analyzed to address why a project would not make an existing transportation facility more attractive to travelers, resulting in trip-inducing changes:

- **Longer trips.** The project would not result in faster vehicle travel times or longer trips along the SR-67 corridor or along Riverford Road, Woodside Avenue, or North Woodside Avenue, leading to land development growth down the corridor, because proposed

improvements are only to segments of roadways and not the entire SR-67 corridor. Roundabouts are also considered a traffic-calming roadway feature (according to OPR Technical Advisory and County Guidelines) and are intended to reduce vehicle speeds while increasing travel safety. To this end, proposed roundabouts' design and geometry would include raised medians and curves to slow vehicular traffic prior to entering the roundabouts, thus "calming" entering traffic speeds. Further, the roundabouts are not anticipated to increase travel speeds or divert drivers from other roadways. Drivers would continue to use pre-selected, presently-used routes to their existing destinations. No new developments or land uses are proposed as part of this project. Therefore, no induced vehicle travel resulting in drivers making longer trips to destinations in this area would occur.

- **Changes in mode choice.** The project would improve multi-modal connectivity at the SR-67/Riverford Road interchange, adding pedestrian and bicycle shared-use pathways, sidewalks, crosswalks, pedestrian push buttons and Rapid Flashing Beacons, and Class II bike lanes on Riverford Road and Woodside Avenue. Improved non-vehicular travel would provide enhanced safety and more attractive routes and modes of transportation to facilitate pedestrian and bicycle circulation. Therefore, changes in mode choice from active (walking or biking) to vehicular use as a result of the proposed project are not expected, and, in fact, the opposite positive change is anticipated.

- **Route changes.** The proposed project does not change the location of where people live and work in the area and, therefore, while it is possible that some drivers may decide to start using the Riverford Road/SR-67 exit once the roundabouts are built, any potential increase in users would be minimal. Additionally, because the roundabouts are considered a traffic-calming roadway feature, speeds along Riverford Road and Woodside Avenue are not anticipated to increase, even with the improvement in traffic circulation, thus unlikely to result in travelers changing their normal travel routes.

- **Newly generated trips.** The project does not propose new developments nor other land use changes. Proposed improvements are limited to existing roadway infrastructure, improving transportation efficiency, reducing queues on highway ramps and roadways, enhancing pedestrian and bicycle facilities, and improving stormwater quality in the area. Therefore, the project is unlikely to attract a substantial number of new motorists. While the project could result in some shift in vehicle trips from one SR-67 exit in the vicinity to the proposed, a substantial increase in the number of new trips is not expected.

- **Land use changes.** The proposed project is not a land use project and does not propose changes to an entire transportation corridor, only to an existing SR-67//Riverford Road interchange. Additionally, land along Riverford Road, Woodside Avenue, and North Woodside Avenue is largely built-out, and changes to the County's General Plan – allowing increased development in this area – are not expected. The proposed project is also located in a land use area of the unincorporated county that is identified as a VMT Infill area in the County's Transportation Study Guidelines. By being located in an area with existing development patterns, fewer VMT would generally be anticipated. Based on the above, the project is not anticipated to lead to new land development or result in induced vehicle trips.

As explained earlier in this section, pursuant to the County's Guidelines, applicable CEQA guidelines, and OPR's Technical Advisory, proposed roundabouts and bicycle/pedestrian facilities are projects that are presumed to have a less than significant impact on transportation. The proposed project would create operational improvements around a single SR-67 interchange, making vehicle, pedestrian, and bicycle mobility more efficient, while reducing traffic congestion and vehicle idling on highway ramps and roadways. Construction would be short-term, temporary, and would not cause a notable increase in VMT. Accordingly, the proposed project would not lead to a measurable increase in vehicle travel and would not change traffic patterns or roadways capacity. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines, Section 15064.3(b) and impacts would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: The goal of the project is to improve traffic circulation and pedestrian/bicyclists mobility around the SR-67/Riverford Road interchange. The project would modify existing roadways' geometric design by making the approach to and within roundabouts curvilinear in order to reduce vehicle speeds prior to entering the roundabouts. However, this would not create a hazard to drivers' visibility because the new roadway configuration would meet or exceed standards for drivers' site-distance (safety), in accordance with the *National Cooperative Highway Research Program Report 672 Roundabouts: An Informational Guide, Second Edition* (2010; hereinafter "*Roundabouts Guide*"). Similarly, the proposed roundabouts and the new northbound and southbound SR-67 ramps would be designed in accordance with the Caltrans' standards, including curvilinear geometry necessary to accommodate semi-trailers' turns around the roundabouts and other large commercial/industrial vehicles and trailers. No impacts to pedestrians' or bicyclists' visibility would occur.

The proposed project would also modify the existing traffic patterns within both intersections by changing vehicles' turns from direct angular turns to going through the roundabouts. The impact would be less than significant as movement through the roundabouts would be more expedient than under existing conditions. Therefore, no significant impact would occur on the roadways or to drivers and pedestrians as any changes would be consistent with the *Roundabouts Guide,* and no sharp curves or dangerous intersections would be created.

Additionally, the project would not place incompatible uses (e.g., farm equipment, signage, or other objects) within the site-distance of the roadways, crosswalks or roundabouts, thus ensuring that the drivers' and pedestrians' line-of-sight is not obstructed. Several retaining walls would be constructed where grading is infeasible and/or to accommodate roadway embankment slopes. However, retaining walls would not impede adequate site distance for drivers, pedestrians, or bicyclists as walls would be built outside of the required clear zones,[9] in compliance with the County's and Caltrans' roadway design requirements.

[9] Clear Zone is an unobstructed, traversable roadside area (roadway shoulder) that allows a driver to pull over into, stop safely, or regain control of a vehicle (FHWA 2023).

As explained above, vehicle approach to the roundabouts and the configuration of the new intersections would be designed in accordance with the *Roundabouts Guide*. Traffic entering each roundabout would yield to vehicles already in the roundabout. Entering vehicles would merge in a counterclockwise direction with the existing flow of traffic. The intersections' configuration would also include crosswalks and ADA ramps for pedestrians and bicyclists. Pedestrian push buttons would be installed on each side of the crosswalks containing Rapid Flashing Beacons (RFBs) in order to activate them. RFBs would enhance pedestrian and bicyclists' safety by allowing them to cross the roundabouts and would be designed in accordance with Caltrans' and County's roadway design standards.

As discussed above, the proposed retaining walls and trees would be placed within proper distance and clearance from the on-road traffic and not pose a hazard to vehicles or pedestrians. All other proposed project improvements are not subject to geometric design considerations, do not pose a hazard, and do not create incompatible uses. Therefore, the proposed project would not significantly alter the geometric design of the intersections, traffic patterns, increase hazards due to design features, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls, which could impede adequate site distances on a road. Impacts would be less than significant.

d) Result in inadequate emergency access?

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

Discussion/Explanation:

Less Than Significant Impact: As discussed in Section IX(f) (Hazards and Hazardous Materials), the proposed project would not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an Emergency Response Plan, Emergency Evacuation Plan, or emergency access. Temporary closures of both SR-67/Riverford Road interchange intersections would occur during construction; however, detours would be available and access to and from the adjacent residential neighborhoods and businesses would be maintained for emergency vehicles, residents, businesses, and others at all times. Additionally, the project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the County's Consolidated Fire Code. Therefore, the proposed project would not result in inadequate emergency access and the impact would be less than significant.

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 section §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

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

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

Discussion/Explanation:

No Impact: Records were obtained from the CHRIS layer of the SCIC on August 22, 2023. The records did not reveal known tribal cultural resources. The County also contacted the NAHC on August 22, 2023, requesting a Sacred Lands File check, to determine whether Sacred Lands may be present on site. The NAHC response letter dated September 7, 2023 noted that the Sacred Lands Files search was positive. The NAHC provided a list and recommended contacting Native American tribes who might have an interest in the project. In addition, on October 18, 2023, the County contacted NAHC for a list of Native American tribal contacts who have requested notice from CEQA Lead Agencies pursuant to the AB 52. The NAHC provided the requested contact information of Native American tribal members, bands, or individuals on November 21, 2023. Using the lists provided by NAHC and the County's existing contact list of Native American tribal representatives who have requested CEQA notices, the County conducted an AB-52 outreach and subsequent consultation as discussed below.

Pursuant to AB 52, consultation was initiated with culturally affiliated tribes. The County DPW notified the Native American tribal members on November 22, 2023 by email and U.S. mail and followed up via emails and phone calls on December 7, 2023 and January 8 and 9, 2024. The following three tribes requested AB 52/Sacred Lands consultation: Campo Band of Mission Indians, Jamul Indian Village, and La Posta Band of Mission Indians/Grey Wolf Band. No tribal cultural resources were identified during consultations. However, per requests made during consultations and consistent with Section 21082 of the Public Resources Code, design features AMM-23 through AMM-29 (see Section V, Cultural Resources) were incorporated, in the event

historical and/or archeological resources or human remains are inadvertently discovered during construction. Additionally, County and Caltrans District 11 will continue to coordinate regarding cultural resources' avoidance and minimization measures for construction and ensure compliance with the County's and Caltrans' cultural resources guidance, policies, and other applicable laws and regulations.

Therefore, the project would not result in an impact to tribal cultural resources. Avoidance and minimization measures AMM-23 through AMM-29, identified in Section V (Cultural Resources) and incorporated by reference herein, would be implemented during construction to preclude potential impacts, should inadvertent discoveries occur. No impact would occur.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The project does not include new or expanded water or wastewater treatment facilities, nor does the project include development that would necessitate construction of such facilities. New stormwater drainage facilities (e.g., vegetated and/or concrete swales) and water quality treatment features (e.g., biofiltration/bioretention basins) would be constructed to capture and treat existing roadway stormwater that ultimately connects to the existing drainage system. Drainage facilities and water quality improvement features would be located at the toes of slopes and/or at low points between multiple slopes. The water quality features would vary in size and may include mulch, vegetation/plantings, and permeable landscape. New curb cuts, gutters, storm drain inlets, ditches, headwalls, channels, and sidewalk underdrains would be added and tie into the existing drainage systems to convey stormwater to the proposed water quality treatment features. Existing drainage patterns, including existing outlets to the San Diego River, would be maintained.

Electric power related to the ongoing use of the SR-67/Riverford Road interchange would be minimal and originate from operations of new streetlights around the roundabouts and potentially pedestrian push-buttons/Rapid Flashing Beacons by two crosswalks.

The proposed project would not result in substantial adverse impacts to telecommunication services, as no addition or expansion of said services is required or proposed. While the project

would relocate utilities before and during construction in order to accommodate the buildout of various project components, the project would not require construction of new or expanded facilities. Impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. Water usage during construction of the project would be temporary and minimal, primarily used for dust control BMPs. After construction, water use would be the minimum necessary for the first three to five years once the improvements are built to allow for establishment and maintenance of the proposed vegetated water quality improvement features (e.g., biofiltration basins) and landscaping (trees and shrubs). However, long-term water supply needs would be negligible as landscaping practices are intended to allow vegetation to, ultimately, become self-sufficient and rely on rain events and runoff irrigation instead of permanent watering. No impact would occur.

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

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

Discussion/Explanation:

No Impact: The project involves improvements, mainly, to existing public transportation and pedestrian facilities. The project would not generate wastewater and therefore would not require a determination by a wastewater treatment provider regarding capacity. No impact would occur.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. As part of construction, the project may generate a negligible amount of solid waste or export of material. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, DEHQ's Local Enforcement Agency division issues solid waste facility permits with concurrence from CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). If the export of solid waste or other materials is needed, the project would deposit all solid waste at a permitted solid waste facility and thereby would comply with federal, state, and local statutes and regulations related to solid waste. Additionally, the project would comply with the County's Construction & Demolition Debris Recycling Ordinance[10] for proper processing and handling of construction and demolition debris generated by construction. Therefore, the project would not generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. As part of project's roadway improvements, the project may generate a negligible amount of solid waste or export material. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, DEHQ's Local Enforcement Agency issues solid waste facility permits with concurrence from the CIWMB under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). If the export of solid waste or other materials is needed, the project would deposit all solid waste at a permitted solid waste facility and, therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

State regulations include Assembly Bills 939, 827, and 1826 require at least 50 percent waste diversion from landfills and organic waste recycling, and State Bill 1383 requires organic waste facilities and operations to measure and report organic waste material activity, including

[10] County Code of Regulatory Ordinances, Title 6, Division 8, Chapter 5

composting and anaerobic digestion. Senate Bill 1374 assists jurisdictions with diverting their construction and demolition waste material with a primary focus on the California Department of Resources Recycling and Recovery, developing and adopting a model construction and demolition diversion ordinance for voluntary use by California jurisdictions. The project would comply with the County's Construction & Demolition Debris Recycling Ordinance for proper processing and handling of construction and demolition debris generated by construction. Therefore, the project would comply with all federal, state, and local management reduction statutes and regulations related to solid waste and no impact would occur.

XX. WILDFIRE

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

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

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

Discussion/Explanation:

No Impact: The proposed project aims to improve traffic circulation and operational efficiency within several roadways and intersections of the SR-67/Riverford Road interchange and improve stormwater quality in the area. The project site is located within the Lakeside Fire Protection District with lands classified as moderate to high Fire Hazard Severity Zones. However, the project would not interfere with an adopted Emergency Response Plan or Emergency Evacuation Plan because it would not prohibit current or subsequent plans from being established or implemented or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not result in an impact to emergency plans.

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

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves improvements within an existing public transportation and pedestrian facilities (i.e., SR-67/Riverford Road interchange). As such, the project site does not contain occupants, nor would the project add structures or development involving new occupants. Though slopes do exist within the project site, the project does not require any significant grading activities. The project would comply with the International Fire Code; California Fire Code; regulations set forth in Sections 13000 et seq. of the California Health and Safety Code; and Title 14, Division 1.5, of the California Code of Regulations. The

project would also comply with County ordinances and the County Consolidated Fire Code. Therefore, the proposed project would not add or increase occupants or exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The proposed project is limited to improving traffic efficiency, adding facilities for active modes of transportation, and installing stormwater quality treatment features within an existing SR-67 interchange. To accommodate proposed improvements, existing utilities, including poles carrying overhead lines, may be relocated outside of the project's boundaries. Additionally, to ensure the facilities function as designed, maintenance work of the roads, shared-use pathways and sidewalks, and other proposed project components would occur, however, they would be sporadic and brief in duration. More importantly, the project would not require installation or result in increased maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impact would occur.

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

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

Discussion/Explanation:

No Impact: The proposed project is limited to improving traffic efficiency, adding facilities for active modes of transportation, and installing stormwater quality treatment features within an existing SR-67 interchange. Several retaining walls are proposed where grading cannot be achieved due to steep highway embankment slopes or adjacent roadways, thereby preventing potential runoff. Slopes under the existing overpass bridges would be stabilized through either pavement or placement of rock in a mortar bed to prevent downslope runoff. New curb cuts, gutters, storm drain inlets, ditches, headwalls, channels, and sidewalk underdrains would be added and tie into the existing drainage system to convey stormwater to the proposed water quality treatment features, to reduce the volume of runoff discharged from the site. Additionally, the project would not modify existing drainage patters, including existing outlets to the San Diego River. Therefore, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, and no impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

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

Discussion/Explanation:
Less Than Significant With Mitigation Incorporated: Per instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in Sections IV (Biological Resources) and V (Cultural Resources) of this form. In addition to project-specific impacts, this evaluation considered the project's potential for significant cumulative effects. Resources that were determined to be significant would be potentially impacted by the project, specifically biological resources. However, mitigation measures M-BIO-1 and M-BIO-2 and avoidance and minimization measures AMM-1 through AMM-22 would reduce these effects to a level below significance.

Research of records related to historical, archaeological, and cultural resources was performed for the project site and a pedestrian cultural survey was conducted with a qualified archaeologist and a Native American monitor. The determination is the project would not result in impacts to cultural resources. Precautionary avoidance and minimization measures AMM-23 through AMM-29 were included, should inadvertent discoveries occur or should previously undiscovered cultural resources and human remains be found.

Geology and soils resources were also evaluated, and the project would not result in a significant impact to these resources. Precautionary avoidance and minimization measures AMM-30 and AMM-31 were included to avoid potential impacts to inadvertent paleontological discoveries, should they occur.

As a result of this evaluation, there is no substantial evidence that, after implementation of the mitigation and minimization and avoidance measures, significant effects associated with this project would occur. Therefore, this project was determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

The evaluation of cumulative impacts includes review and analysis of past, present, and reasonably foreseeable future actions and their impacts on environmental resources in the context of the proposed project.

Less Than Significant Impact: For the purposes of cumulative impacts analysis, a list of past, present and future projects located within a one-mile radius of the project was compiled and evaluated as part of this Initial Study. Factors considered when determining whether to include a project were: location of other projects, type, status, and their potential to produce environmental impacts.

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

No	PROJECT NAME	PERMIT/MAP NUMBER	CEQA Document Status [11]
1.	El Nopal Time Extension Revised Map	PDS2023-ER-17-14-002B and PDS2023-ER-17-14-002C	In application intake phase
2.	Hillside Meadows Open Space Easement Vacation	PDS2023-ER-98-10-014ZZZ	In application intake phase
3.	Germann Tentative Map	PDS2022-ER-06-14-048A and PDS2022-TM-5520TE	County found to be exempt from additional environmental review pursuant to CEQA Guidelines §15183
4.	Southland Envelope – Addition	PDS2021-ER-98-14-027A	In application intake phase
5.	River Run East 2	PDS2021-ER-21-14-010	In application intake phase
6.	Palisades Santee Commerce Center (in entitlements review phase)	Conditional Use Permit P2023-1; Development Review Permit DR2023-2	In development review/entitlements review phase

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in Section I through Section XX of this form. In addition to project-specific impacts, this evaluation considered projects' potential for incremental effects that are cumulatively considerable. Impacts

[11] All projects in this table were researched for CEQA status and, with the exception of item #3, were found not to have an environmental document published as of October 2024.

associated with the proposed project would affect a minor quantity of sensitive vegetation communities, potentially impact avian, invertebrate, amphibian, and reptile species, and existing riparian CDFW jurisdictional areas. These impacts would be mitigated to a level of less than significant. All other project impacts to environmental resources would be less than significant without mitigation. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

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

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

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

PROJECT-SPECIFIC REFERENCES

County of San Diego, Lakeside Community Plan, San Diego County General Plan, August 3, 2011.

Federal Register, The Daily Journal of the United States Government, Volume 64, Number 25: Executive Order 13112, Invasive Species. February 8, 1999. (https://www.federalregister.gov/documents/1999/02/08/99-3184/invasive-species).

Linscott, Law & Greenspan, Engineers. Riverford Road Roundabouts – VMT Assessment, December 22, 2023.

National Cooperative Highway Research Program Report 672 Roundabouts: An Informational Guide, Second Edition, 2010. (https://nacto.org/docs/usdg/nchrprpt672.pdf).

Ninyo & Moore. Phase I Environmental Site Assessment: Riverford Road Roundabouts, March 27, 2024.

RE Services. Visual Impact Assessment Memorandum (Minor Level VIA): Riverford Road Roundabouts Project, April 2024.

RECON Environmental, Inc. Air Quality Analysis for the Riverford Road Roundabouts Project, April 3, 2024.

RECON Environmental, Inc. Archeological Survey for the Riverford Road Roundabouts Project, March 2024.

RECON Environmental, Inc. Aquatic Resource Delineation Report for the Riverford Road Roundabouts Project, December 15, 2023.

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