

**FINAL
SUBSEQUENT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
RESPONSE TO COMMENTS**

**Paseo Norte Senior Affordable Housing Project
SCH No. 2023120496**

**Lead Agency:
County of San Diego
General Services
5560 Overland Avenue, Suite 410
San Diego, CA 92123
Contact: Marcus Lubich, Project Manager**

**Preparer:
Environmental Science Associates (ESA)
2355 Northside Drive, Suite 100
San Diego, CA 92108**



March 2024

Volume 1. Chapter 1 Introduction

V1.1.1 Overview of the Final Subsequent IS/MND

This Final Subsequent Initial Study/Mitigated Negative Declaration (Final Subsequent IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

Volume 1 of this Final Subsequent IS/MND contains a list of persons, organizations, and public agencies commenting on the proposed Paseo Norte Senior Affordable Housing Project (proposed project) Draft Subsequent IS/MND; comments received on the Draft Subsequent IS/MND; and the County of San Diego (County's) responses to significant environmental points raised in those comments. As lead agency, the County circulated the Draft Subsequent IS/MND for a 53-day public review period to allow for public agencies and members of the public to submit comments on the environmental analyses and significant environmental impacts, if any, provided within the Draft Subsequent IS/MND for the proposed project. In addition, public review of the Draft Subsequent IS/MND ensured a meaningful opportunity for agency and public input to be incorporated into the decision-making process. All comments made to the County during the Draft Subsequent IS/MND comment period are included in this Final Subsequent IS/MND for consideration by the County prior to making a final decision on the project.

This Final Subsequent IS/MND includes responses to comments on the Draft Subsequent IS/MND, including comments that have resulted in revisions to the text. Other minor clarifications have also been made. This Final Subsequent IS/MND reflects all changes made to the Draft Subsequent IS/MND in ~~strikeout~~/underline text. Volume 2 of this Final Subsequent IS/MND includes the full Draft Subsequent IS/MND with changes made in ~~strikeout~~/underline text.

V1.1.2 Public Review of Draft Subsequent IS/MND

In accordance with Section 15105 of the California Environmental Quality Act (CEQA) Guidelines, a public review and comment period was provided for the Draft Subsequent IS/MND beginning December 14, 2023. Following a 53-day review period, the public review and comment period on the Draft Subsequent IS/MND closed on February 5, 2024. As shown in **Table V1.1-1**, a total of two written comment letters were received by the County on the Draft Subsequent IS/MND.

**Table V1.1-1
List of Commenters on the Subsequent IS/MND**

| Letter # | Commenter | Date of Comment |
|----------|---|-----------------|
| A | San Diego County Archaeological Society | 1/13/2024 |
| B | California Department of Transportation (Caltrans) | 1/29/2024 |

V1.1.3 Refinements to the Draft Subsequent IS/MND

Following the publication and circulation of the Draft Subsequent IS/MND, the County made the following minor corrections to mitigation measures. The revisions do not change the Subsequent IS/MND conclusions. This information does not constitute a substantial revision to the Draft Subsequent IS/MND as defined in CEQA Guidelines Section 15073.5. As such, recirculation of the Subsequent IS/MND is not necessary.

The Subsequent IS/MND text in *Section IV. Biological Resources* is revised as follows:

MM-BIO-4: Impacts to special-status bats would be avoided by conducting all construction outside of the maternity roosting season (i.e., work should occur ~~November~~ October 1 to February 28). If construction cannot avoid the maternity roosting season, the following measures would be implemented:

Prior to construction during the maternity roosting season (March 1 through September 30), a qualified biologist experienced with bat roost biology should conduct a pre-construction survey of all suitable habitat for the presence of special-status bats. The surveys shall be conducted at dusk and after nightfall by a biologist using sonic bat detectors (e.g., Anabat or Sonobat). If an active roost site is located during the pre-construction survey, the roost shall be avoided and project activities shall be conducted as recommended by the biologist to avoid the area, which may include provision of a suitable buffer established around the maternity roost until roosting activities cease, or temporary postponement of construction activities. A biological monitor shall be on-site during construction to confirm the buffers are adequate to avoid and minimize disturbance to maternity roosts.

The Subsequent IS/MND text in *Section XIX. Utilities and Service Systems* is revised as follows:

MM-HYD-1: Prior to project approval, the ~~County-developer~~ shall prepare a hydrology and drainage study in accordance with the guidance contained within the San Diego County Hydrology Manual. The study shall delineate drainage areas, describe pre- and post-project cover conditions (including impervious areas), specify design storm events, and compare pre- versus post-project stormwater runoff rates and volumes. The study shall comply with applicable County codes, including the County of San Diego Flood Damage Prevention Ordinance, the County's RPO, and Board of Supervisors Policy I-68. The study shall detail the necessary drainage design to ensure the health and safety of project site occupants and to avoid adverse impacts to off-site properties and Santa Maria Creek.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 January 2024

To: Mr. Marcus Lubich
Department of General Services
County of San Diego
5560 Overland Avenue, Suite 410
San Diego, California 92123

Subject: Draft Subsequent Mitigated Negative Declaration
Paseo Norte Senior Affordable Housing Project

Dear Mr. Lubich:

I have reviewed the subject DSMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the documents posted on the County's website, including its Appendix E, we agree with the proposed mitigation program as defined in the DSMND.

SDCAS appreciates the opportunity to participate in the public review period for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: ESA
SDCAS President
File

A-1

Comment Letter A Response

San Diego County Archaeological Society

- A-1 The commenter agrees with the proposed mitigation program and appreciates the opportunity to participate in the public review process. The comment is general in nature and therefore no specific response is required.

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January 29, 2024

11-SD-67
PM 24.126
Paseo Norte Senior Affordable Housing
MND/SCH#2023120496

Mr. Marcus Lubich
Project Manager
County of San Diego, Department of General Services
5560 Overland Avenue, Suite 410
San Diego, CA 92123

Dear Mr. Lubich:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the Paseo Norte Senior Affordable Housing project located near State Route 67 (SR-67). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

B-1

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

B-2

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the County of San Diego in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and

connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Engineering and Analysis

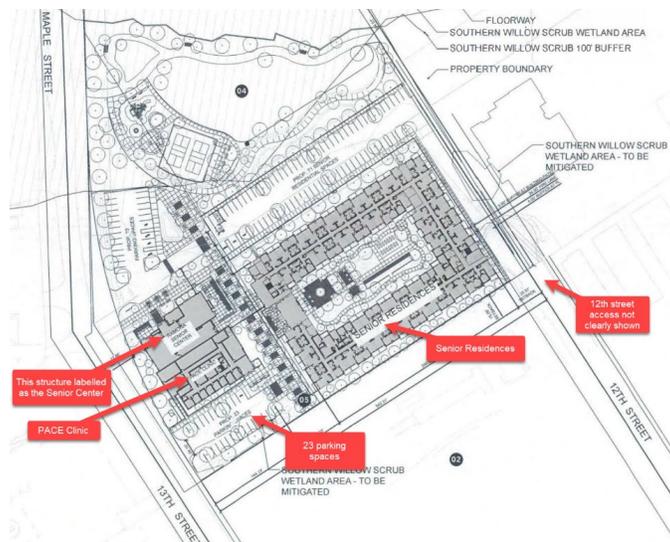
- This project proposes a total of 134 AM Peak hour and 179 PM Peak hours. These trips will most likely be coming from SR-67 /Main Street intersections of 12th Street and 13th street.
- Caltrans sent a comment letter on March 7, 2023, for the first review of the 13th Street intersection and 12th Street intersection delay analysis due to the proposed project trip generations. Caltrans comments were:

A. If 12th street will be used as an additional access street, then a transportation study to analyze the intersection impacts on SR-67 will need to be provided to Caltrans.

B. If 13th street driveway access is removed and then 12th street is used as a main gateway, a transportation study to analyze the intersection impacts on SR-67 will need to be provided to Caltrans.

This information was not provided.

The previous site plan showed the following:



B-2
cont.

B-3

B-4

B-5

B-6

- The current site plan now shows the Senior Center in a different location and 23 parking spaces removed.
- Please clarify if the Senior Center is located at the PACE location or if it is located at the Senior Housing location. In the text of the document, it seems that the Senior Center is located at the PACE location, but the map below shows it located at the Senior Housing.

↑ B-6
cont.



B-7



- There is no mention of the number of employees and where these employees will be parking. Please clarify. | B-8
- Site plan does not show sidewalk improvements on 12th and 13th Streets that connect to existing sidewalks near SR-67/Main Street. The MND verbiage states these improvements. Please confirm in the site plan if sidewalk improvements will occur on 12th and 13th Streets. | B-9
- The 12th Street access seems to be half the width of the 12th Street roadway. Please clarify if this will this be a one-way entrance only. It is recommended the 12th Street extension be widened to accommodate two lanes in each direction with shoulders. | B-10

Hydrology and Drainage Studies

- Please provide preliminary grading plans and hydrology/hydraulics studies for the existing and proposed conditions. | B-11
- Please provide proof of coordination with San Diego County Flood Control regarding impacts to the floodway. Provide written proof of the project's approval by San Diego County Flood Control. | B-12
- On all plans, show Caltrans' Right-of-Way (R/W). | B-13
- Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed. | B-14
- Early coordination with Caltrans is recommended. | B-15

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged. | B-16

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

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B-16
cont.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

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B-17

The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67.

↑
B-18

Environmental

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, California Environmental Quality Act (CEQA) determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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B-19
↓

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans'

R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

↑
B-19
cont.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the CEQA and National Environmental Policy Act (NEPA) standards.

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B-20

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

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B-21

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

↑
B-22

If you have any questions or concerns, please contact Sandy Vazquez, LDR Coordinator, at (619) 987-3580 or by e-mail sent to Sandra.Vazquez@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, G.I.S.P.
Acting Branch Chief
Local Development Review

Comment Letter B Response**Caltrans**

- B-1 This comment is introductory in nature and describes the purpose of the comments to follow. The comment does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-2 This comment is introductory in nature and describes the goals of Caltrans and the purpose of the comments to follow. The comment does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-3 The comment contains incorrect information on the proposed project's AM and PM peak hour trips. The comment identifies the project's AM and PM peak hour trips as 134 and 179, respectively; however, as shown in Table 11 of the Draft Subsequent IS/MND (page 75), the commenter identified the peak hour rates of the previous 2017 project. As detailed in *Section XVII, Transportation*, vehicle trips generated by the proposed project would be 37 AM peak hour trips and 48 PM peak hour trips, less than one-half of the number estimated for the prior project.
- B-4 The comment states that if 12th Street will be used as an access street, then a transportation study would be needed to analyze the intersection impacts on SR-67. The Draft Subsequent IS/MND Project Description (page 7) details that access to the project site would occur along 12th Street. However, following publication and circulation of the Draft Subsequent IS/MND, the developer has refined the design of 12th Street as emergency access only. The revision does not change the Subsequent IS/MND conclusions. This information does not constitute a substantial revision to the Draft Subsequent IS/MND as defined in CEQA Guidelines Section 15073.5. As such, recirculation of the Subsequent IS/MND is not necessary. As detailed in *Section XVII, Transportation* (page 75), the Transportation Impact Analysis for the prior project identified impacts to surrounding intersections, including a significant impact at the Main Street/12th Street intersection, which would be mitigated with the payment of fair share fees to the County's TIF through conformance with MM-TRA-1. As detailed in the Subsequent IS/MND, the County's processes have evolved, and implementation of MM-TRA-1 is no longer required. Further, as demonstrated in Table 11, the proposed project would generate far fewer trips relative to the prior project and would have a

substantially lessened impact on intersections in the project area. Additionally, as detailed in *Section XVII, Transportation* (page 76), the County's Transportation Study Guidelines includes screening criteria for CEQA VMT analysis, which includes housing projects consisting of 100 percent affordable units. The proposed project would meet this screening criteria and is considered to have a less than significant VMT impact and therefore is not required to prepare a detailed transportation VMT analysis.

The following revision has been incorporated into the Subsequent IS/MND Project Description (page 7) to detail the change in access to the project site from 12th Street. This information does not constitute a substantial revision to the Draft Subsequent IS/MND as defined in CEQA Guidelines Section 15073.5, and recirculation is not required.

The proposed project would include two parking lots: senior center and PACE Wellness Center parking to the north of the PACE Wellness Center, and senior residential parking to the north of the residential building. The two parking lots would have egress and ingress ~~via the terminus of 12th Street and via 13th Street.~~ Access from 12th Street would be used for emergency purposes only. The proposed project would include approximately 98 parking spaces total.

The following revision has been incorporated into the Subsequent IS/MND, *Section XVII, Transportation* (page 76). This information does not constitute a substantial revision to the Draft Subsequent IS/MND as defined in CEQA Guidelines Section 15073.5, and recirculation is not required.

Vehicular access to the proposed project's parking lot would be provided via ~~two driveways: one located on the east side of the project site off of the cul-de-sac located at the northern terminus of 12th Street, and one driveway located on the west side of the project site on 13th Street where it transitions to Maple Street.~~ Access from 12th Street would be used for emergency purposes only. The previous project proposed a total of five driveways for project site access, including three on 13th Street and two on 12th street. By consolidating access to ~~one location on 12th Street and one location on 13th Street,~~ the proposed project would limit the potential conflict points where vehicles could interact with bicyclists or pedestrians using project area roadways. ~~Since vehicular access to the project site would be provided via both~~

~~12th Street and 13th Streets, the~~ While the previous project's trip distribution patterns assumed for the previous project, which also assumed access via these two roadways, would also apply to the proposed project. However, given the substantially lower number of vehicles generated by the proposed project in comparison to the previous project, impacts generated by project traffic on study area roadways would be less severe than those described in the 2017 IS/MND.

- B-5 The comment states that if 13th Street driveway access is removed and 12th Street is used as a main gateway, then a transportation study would be needed to analyze the intersection impacts on SR-67. As shown in Figure 3 of the Subsequent IS/MND, and as detailed within the Project Description (page 7), ingress and egress to the project site would continue to be available from 13th Street.
- B-6 The comment includes a graphic of a previous site plan and states that the current site plan shows the Senior Center in a different location and parking spaces removed. This previous site plan was in draft form and shared with Caltrans prior to public review. As shown in Figure 3 of the Subsequent IS/MND and as detailed in the Project Description (page 3 and page 7), the senior center would be located within the senior residential housing building. Additionally, as detailed in the Project Description (page 7), the project would include two parking lots, totaling approximately 98 parking spaces. Parking is not a topic required to be analyzed in a CEQA document. The proposed project would be required to be parked in compliance with County parking regulations.
- B-7 This comment requests clarification on the location of the Senior Center. As detailed in the Project Description (page 3 and page 7) and as shown in Figure 3 of the Subsequent IS/MND, the senior center would be located within the residential building.
- B-8 This comment states that there is no mention of the number of employees or employee parking. As detailed in the Project Description (page 9), the senior center would be staffed with approximately three full time employees, the senior housing would have eight full time employees, and the PACE Wellness Center would have 24 full time employees. Parking is not a topic required to be analyzed in a CEQA document. The proposed project would be required to be parked in compliance with County parking regulations. Nevertheless, the following revision has been incorporated into the Subsequent IS/MND, Project Description

(page 7). This information does not constitute a substantial revision to the Draft Subsequent IS/MND as defined in CEQA Guidelines Section 15073.5, and recirculation is not required.

The proposed project would include approximately 98 parking spaces total. The senior residential parking lot would include approximately 73 parking spaces, and the western lot serving the senior center and PACE Wellness Center would include 25 spaces (including 14 employee spaces).

- B-9 This comment requests clarification on whether sidewalk improvements would occur on 12th and 13th Street. As detailed in the Project Description (page 8), pedestrian improvements would include construction of periphery sidewalks along 12th Street (sidewalk pedestrian improvements along 13th Street are being proposed and analyzed as part of the 13th Street Bridge Project [SCH #2021100070]).
- B-10 This comment requests clarification of whether the 12th Street access would be a one-way entrance only. This comment also recommends that 12th Street extension be widened to accommodate two lanes in each direction with shoulders. Due to limited space, the driveway located on the east side of the project site cannot be widened. As detailed above in Response to Comment B-4, the developer has refined the design of 12th Street as emergency access only.
- B-11 This comment requests preliminary grading plans and hydrology/hydraulics studies for the existing and proposed conditions. Preliminary grading plans have not been completed at this time. Grading plans will be submitted and approved by the County prior to obtaining a grading permit. The commenter is referred to *Section X, Hydrology and Water Quality*, of the Draft Subsequent IS/MND (page 54 and 55), for a discussion regarding the hydrology analysis. As detailed within *Section X, Hydrology and Water Quality*, the proposed project would be required to meet County and Federal Emergency Management Agency (FEMA) floodplain regulations. The comment does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-12 This comment requests proof of coordination with the San Diego County Flood Control. The commenter is referred to *Section X, Hydrology and Water Quality*, of the Draft Subsequent IS/MND (page 54 and 55), for a discussion regarding the hydrology

analysis. As detailed within *Section X, Hydrology and Water Quality*, the proposed project would be required to meet County and FEMA floodplain regulations. The comment does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.

- B-13 This comment states to include Caltrans' right-of-way on all plans. The Project site is not located within the Caltrans right-of-way. Therefore, no further response is required.
- B-14 This comment states that Caltrans does not allow development projects to impact hydraulics within the State's right-of-way and any modifications to the existing Caltrans's drainage and/or increase in runoff to State facilities will not be allowed. The Project Site is not located within Caltrans's right-of-way. Therefore, no further response is required.
- B-15 This comment recommends early coordination with Caltrans. This comment is general in nature and does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-16 This comment recommends coordination with Caltrans on all transportation improvements to promote a complete and integrated transportation network and reduce greenhouse gas emissions. The comment is general in nature and does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-17 This comment states that Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" land use planning and policies. This comment is general in nature and does not address the adequacy of the Subsequent IS/MND and therefore no further response is required.
- B-18 This comment states that Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67. This comment is general in nature and does not address the adequacy of the Subsequent IS/MND and therefore no further response is required.
- B-19 This comment states that should any work occur within the Caltrans right-of-way, an encroachment permit would be required, along with supporting documentation to address all potential impacts to the

right-of-way. The Project Site is not located within the Caltrans right-of-way. Therefore, no further response is required.

- B-20 This comment states that Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificant pursuant to the CEQA and National Environmental Policy Act (NEPA) standards. This comment is general in nature and does not address the adequacy of the Subsequent IS/MND and therefore no specific response is required.
- B-21 This comment states that perpetuation of survey monuments is required, and any work performed within Caltrans right-of-way will require discretionary review and approval by Caltrans and an encroachment permit would be required. The proposed project is not destroying any survey monuments and the Project Site is not located within the Caltrans right-of-way. Therefore, no further response is required.
- B-22 This comment is a conclusion to the comment letter and provides contact information for Caltrans. The comment is general in nature and does not specifically address the adequacy of the Subsequent IS/MND and therefore no specific response is required.