

ADDENDUM

to the

FINAL MITIGATED NEGATIVE DECLARATION FOR APOLLO SENIOR CARE FACILITY

**City File No. ENV19-0003
SCH# 2019119041**

Prepared for:

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CONTENTS

Contents	iii
Introduction	1
Project Revision.....	1
Statutory Background	7
Impact Analysis.....	7
Biological Resources	7
Summary and Findings.....	9

TABLES

Figure 1	Project Vicinity Map	2
Figure 2	Rendering	3
Figure 3	Site Plans	4
Figure 4	Biological Resources	5

INTRODUCTION

This Addendum to the Final Mitigated Negative Declaration (MND) for the Apollo Senior Care Facility (SCH No. 2019119041) has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15164. It updates the MND that was prepared for the City of Escondido (City) and adopted on January 14, 2020. The adopted MND is available for review at the City of Escondido Planning Department, which is located at 201 North Broadway, Escondido, CA 92025.

On January 14, 2020, the Escondido City Council adopted an MND and Mitigation Monitoring Program (City File No. 19-0003) for a proposed Assisted Living/Memory Care Facility at 3141 East Valley Parkway in the City of Escondido (Figure 1). The project will include 78 units, including 53 assisted living units consisting of studio, one-bedroom, and two-bedroom units, and 25 memory care units consisting of studios and double rooms. The project will include 41 parking spaces for employees and residents/guests. The facility will have a partial floor at ground level and three full floors above.

The environmental analysis identified mitigation measures to address and mitigate potentially significant impacts to a less-than-significant level in accordance with CEQA. Mitigation measures were identified to address impacts associated with biological resources, paleontological resources, and tribal cultural resource that would occur with project implementation.

PROJECT REVISION

Since approval of the Final MND, the project site design was modified to increase the basement's interior floor area from 4,927 square feet to 8,026 square feet and the reconfiguration of interior use of the space to allow for laundry use. Design modifications also included detailing of the building façade. A comparison of the changes between the original site plan and the proposed improvements are shown on Figures 2 and 3. The modified plot plan would not change the number of units or result in an increase in traffic. Additionally, on January 21, 2020, following project approval, the project applicant (Apollo) received comments from the City of Escondido Fire Department requesting for the preparation of a fuel modification site plan. As a result, Brush Management Zone (BMZ) 1 and BMZ 2 overlays were added to the plot plan, as shown on Figure 4.

There are no substantial changes to the approved project; therefore, this addendum only addresses the proposed modifications associated with the addition of the fuel management zones and revised site plan layout and compares the associated potential environmental impacts of the proposed project relative to biological resources. This Addendum is an informational document that is intended to be used in the planning and decision-making process as provided for under CEQA Guidelines Section 15164.



Source: SANDAG & SanGIS 2017

Figure 1
APOLLO SENIOR CARE PROJECT



0 2,000
Feet

Project Vicinity Map



1 PREVIOUSLY APPROVED

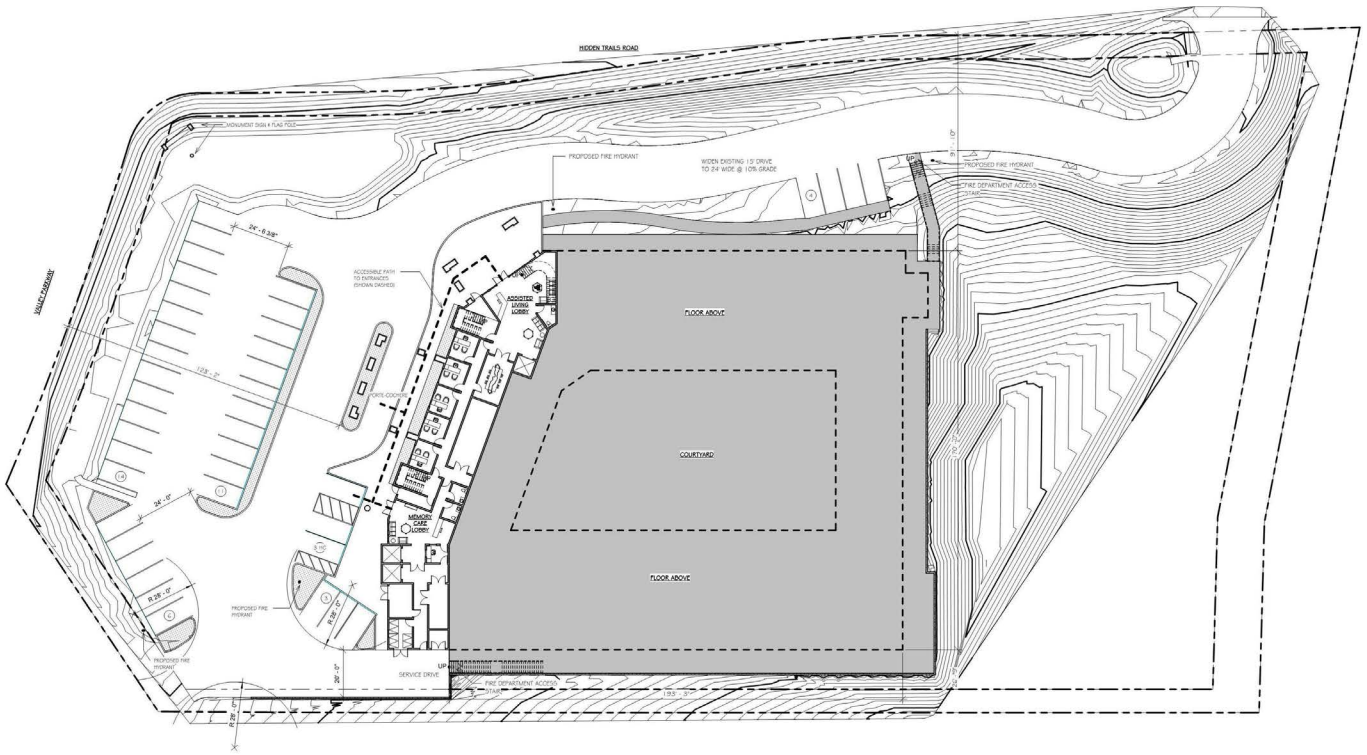


2 PROPOSED

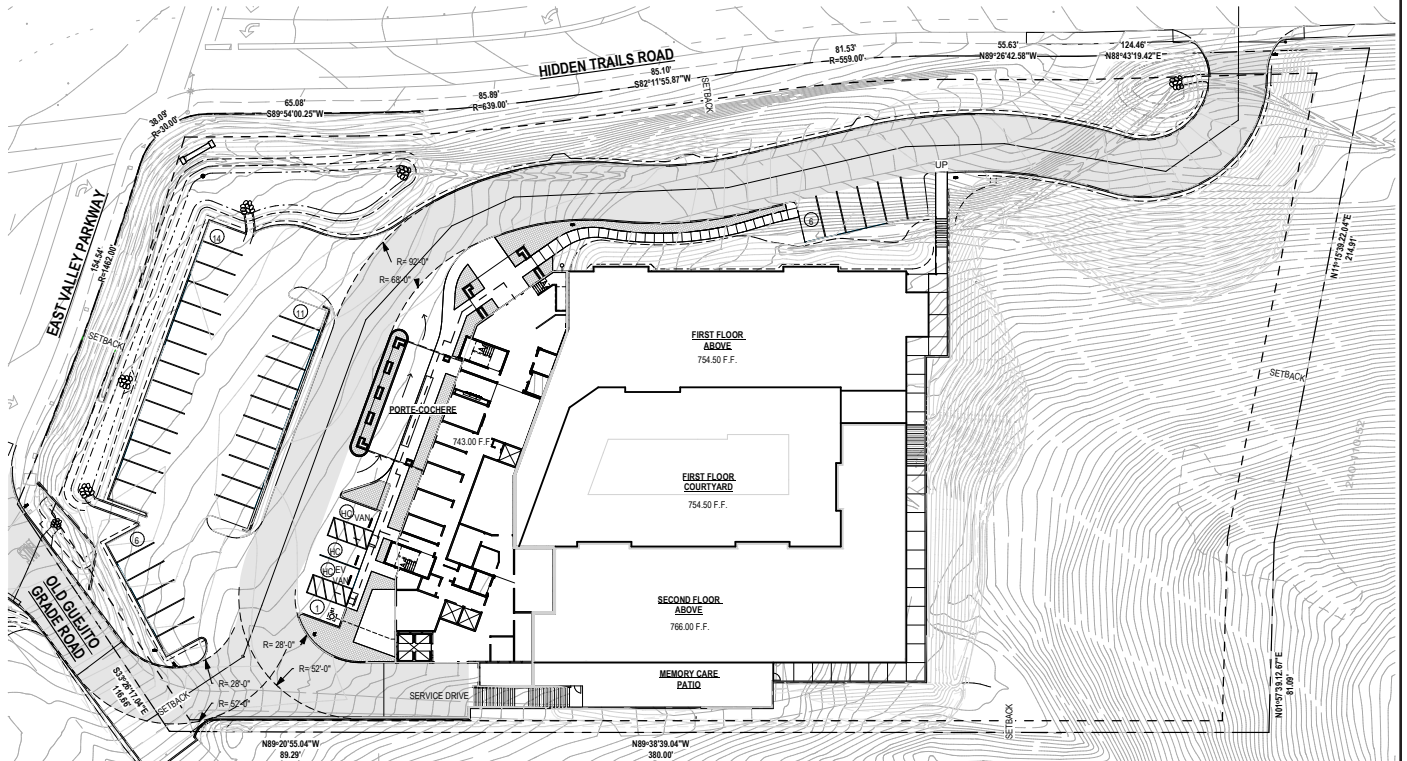
Source: NOAA Group Architects 2021



Figure 2
APOLLO SENIOR CARE PROJECT
Rendering



1 SITE PLAN - PREVIOUSLY APPROVED
SCALE: 1" = 30'-0"



2 SITE PLAN - PROPOSED
Ref: 7 / Scale: 1" = 30'-0"



Source: NOAA Group Architects 2021



Figure 3
APOLLO SENIOR CARE PROJECT
Site Plans

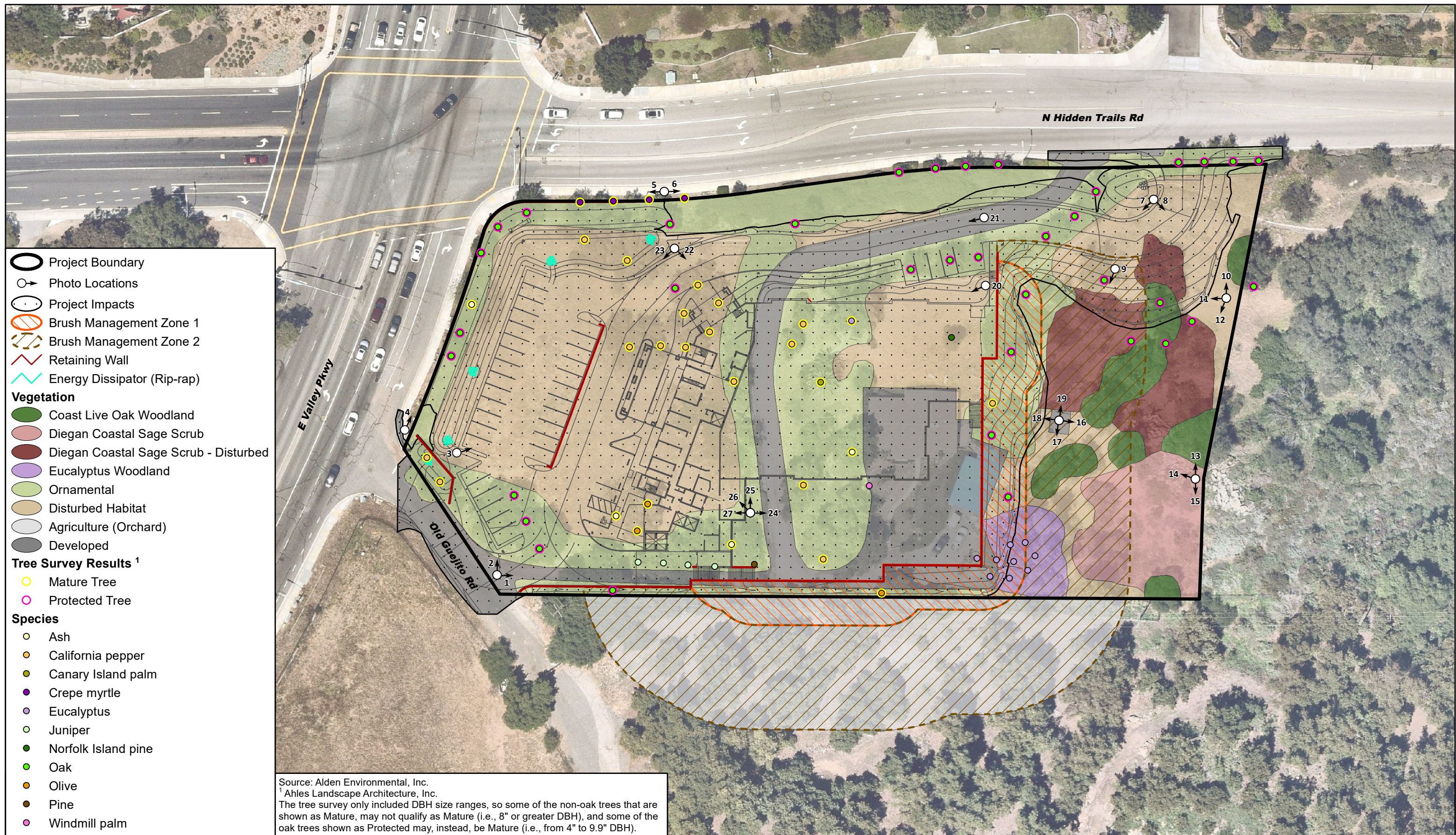


Figure 4
APOLLO SENIOR CARE PROJECT

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This Addendum concludes that the proposed changes to the revised plot plan will not:

1. Result in new significant impacts; or
2. Substantially increase the severity of previously disclosed impacts beyond those already identified in the 2020 MND. Therefore, a subsequent MND would not be required under CEQA to implement the proposed project modifications.

STATUTORY BACKGROUND

The City of Escondido is the CEQA lead agency for the proposed project. Under CEQA, an addendum to a certified environmental impact report (EIR) or negative declaration may be appropriate if minor technical changes or modifications to the project are proposed (CEQA Guidelines Section 15164). An addendum is appropriate only if these minor technical changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The addendum need not be circulated for public review (CEQA Guidelines Section 15164(c)). Because no changes in the approved project are proposed, this Addendum does not require a public hearing or consideration by the City Council.

This MND Addendum demonstrates that the environmental analysis, impacts, and mitigation measures/requirements identified in the 2020 MND remain unsubstantively unchanged by the situation described herein, and it supports the finding that the proposed project modifications do not result in new significant impacts and do not exceed the level of impacts identified in the 2020 MND. Therefore, recirculation of the adopted MND for public review is not required, pursuant to CEQA Guidelines Section 15164. The City also has determined that preparation of a subsequent EIR or MND is not required under CEQA Guidelines Section 15162. To support this decision, the following discussion describes the proposed project modifications and the associated environmental analysis.

IMPACT ANALYSIS

City staff reviewed the adopted 2020 Initial Study/MND in conjunction with the proposed modifications to the plot plan and has determined that the proposed changes described in this Addendum would not result in any new significant impacts or a substantial increase in the severity of significant impacts identified for the previously adopted MND for all the resource areas. The addition of the fuel management zone was a new issue that warrants further analysis under biological resources, as described below.

Biological Resources

The originally approved project and proposed plot plan modification would affect the same project site; however, there was a slight change to the project impact area as a result of the addition of BMZ 1 and BMZ 2 to the plot plan, as shown in Figure 3. The BMZ indicates the area where fuel management would occur for fire protection purposes. BMZ 1 extends approximately 30 feet from

the proposed structures and would involve removal of vegetation, pruning of vegetation, and removal of flammable items. BMZ 2 extends an additional 70 feet from the edge of BMZ 1. BMZ 2 involves a lesser level of clearing and is focused on removal of fallen vegetation, moving of grasses, and shrub spacing.

As shown in **Table 1** (impacts from original site plan) and **Table 2** (impacts with proposed modifications), fuel management activities associated with BMZ 1 and BMZ 2 would result in a slight increase of impacts on existing vegetation. The IS/MND identified a total impact of 2.49 acres on existing vegetation. With the addition of the BMZs, this area would increase to 2.65 acres, and the area would occur on non-sensitive areas previously addressed in the Biological Resources Report (Alden Environmental 2019). A GIS analysis was conducted to calculate impacts for BMZ 1 and found it was located either within the project grading area or within non-sensitive areas previously addressed in the Biological Resources Report. Impacts from BMZ 2 were determined to be non-significant as the level of management is lower and would not remove vegetation communities. An avocado orchard is located off site to the south of the project. A portion of the project's BMZ extends into this area, but there is no proposed off-site development. The avocado grove is not considered to be a sensitive biological resource.

Table 1
Impacts to Vegetation Communities and Land Cover (Original Site Plan)

Biological Resource	On Site	Off Site	Total
Coast live oak woodland	0.01	0.00	0.01
Diegan coastal sage scrub	0.00	0.00	0.00
Diegan coastal sage scrub-disturbed	0.03	0.00	0.03
Eucalyptus woodland	0.02	0.00	0.02
Ornamental	0.83	0.02	0.85
Disturbed Habitat	1.10	0.00	1.10
Developed	0.48	0.00	0.48
Totals	2.47	0.02	2.49
SOURCE: Apollo Assisted Living Project, Biology Letter Report (Alden Environmental 2019)			

Mitigation measures would continue to remain in place to offset potential impacts to identified vegetation communities within the biological study area (specifically coast live oak woodland and Diegan coastal sage scrub-disturbed) and loss of 23 oak trees. The proposed modification would not impact any sensitive plant or animal species with potential to occur within or near the project footprint.

Table 2
Impacts to Vegetation Communities and Land Cover (Proposed Plan)

Biological Resource	On Site^a	Off Site^b	Total
Coast Live oak woodland	0.01	0.00	0.01
Diegan coastal sage scrub	0.00	0.00	0.00
Diegan coastal sage scrub-disturbed	0.03	0.00	0.03
Eucalyptus woodland	0.02	0.00	0.02
Ornamental	0.91	0.02	0.93
Disturbed habitat	1.11	0.00	1.11
Developed	0.48	0.00	0.48
Agriculture	0.00	0.07	0.07
Total	2.56	0.09	2.65

SOURCE: Alden Environmental 2021

^a Includes BMZ 1 impacts

^b Off-site impacts associated with the project access locations and BMZ 1.

SUMMARY AND FINDINGS

The City previously prepared and adopted the 2020 MND, which is on file in the Planning Division. The CEQA Guidelines call for an addendum to an adopted negative declaration to be prepared if only minor technical changes or additions are necessary, or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred (see Section 15164).

Pursuant to CEQA Guidelines Section 15162(a) and based upon a review of the current proposed project, it has been determined that:

1. No substantial changes are proposed in the project that would require major revisions of the 2020 MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that would require major revisions of the 2020 MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and
3. There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2020 MND was certified as complete, that shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the 2020 MND;

- (B) Significant effects previously examined will be substantially more severe than shown in the 2020 MND;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives that are considerably different from those analyzed in the 2020 MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA is clear in its preference to use previously prepared environmental documents when anticipated project-specific impacts have been clearly assessed. CEQA Guidelines Section 15162 prescribes criteria where a previously adopted negative declaration can be used and when a new negative declaration should be prepared.

The Impact Analysis in this Addendum indicates the proposed modification is in substantial conformance with the previously approved design and operation of the project and, therefore, would have no new impacts to biological resources not already identified in the previous 2020 MND. The proposed plot change modifications associated with the increased basement area and façade improvements were not deemed to result in new impacts on all other resource areas and no further discussion was warranted. The 2020 MND did not identify any impacts associated with implementation of the proposed project that would be significant after mitigation. This Addendum does not identify any proposed project impacts that would be significant after mitigation, and no new or additional mitigation is required.

There is substantial evidence to approve this Addendum pursuant to CEQA Guidelines Sections 15164 and 15162. No additional environmental review is warranted because the lead agency has determined that, on the basis of substantial evidence in the whole record, the proposed project does not create any of the substantial effects on the environment that are identified in Section 15162(a)(1) through (a)(3). No circulation of this Addendum for public comment is required (CEQA Guidelines Section 15164(c)).

This Addendum was considered and made a final part of the Administrative Record for the project on _____. This Addendum will be considered, along with the Final MND, in any future discretionary actions or other actions associated with the project.

Associate Planner
City of Escondido, Planning Division

Date