HELIX Environmental Planning

Del Prado Project

Final Mitigated Negative Declaration

April 2016

Prepared for:
City of Escondido
Planning Division
201 North Broadway
Escondido, California 92025

Prepared by:
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CITY OF ESCONDIDO
DEL PRADO PROJECT
FINAL MITIGATED NEGATIVE DECLARATION

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LIST OF APPENDICES

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ACRONYMS

AB	Assembly Bill
ADT	average daily trips
APN	Assessor's Parcel Number
AMSL	above mean sea level
ATS	advanced treatment systems
AQIA	Air Quality Impact Analysis
BAT	best available technology
BCT	best conventional pollutant control technology
BMPs	Best Management Practices
CalEEMod	California Emission Estimator Model
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CASQA	California Storm Water Quality Association
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CFG Code	California Fish and Game Code
C-G	Commercial General
CGS	California Geological Survey
City	City of Escondido
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
County	County of San Diego
CSMP	Construction Site Monitoring Program
cy	cubic yards
dB	decibels
dBA	A-weighted decibels
DMAs	drainage management areas
DPM	diesel particulate matter
E-CAP	Escondido Climate Action Plan
EMT	emergency medical technician
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GB	Green Building
GC	General Commercial
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HELIX	HELIX Environmental Planning, Inc.

HMP	Hydromodification Management Plan
HRECs	Historical Recognized Environmental Conditions
HVAC	heating, ventilation and air conditioning
I-15	Interstate 15
IPM	integrated pest management
IS/MND	Initial Study/Mitigated Negative Declaration`
JURMP	Jurisdictional Urban Runoff Management Plan
KOA	KOA Corporation
L_{EQ}	one-hour average sound level
LID	low impact development
LOS	Level of Service
LUST	leaking underground storage tank
Masson	Masson & Associates
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MEI	maximally exposed individual
MEP	maximum extent practicable
MHCP	Multiple Habitat Conservation Program
MND	Mitigated Negative Declaration
mph	miles per hour
MT	metric tons
MTS	Metropolitan Transit System
NCCP	Natural Community Conservation Plan
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PCP	Pentachlorophenol
PD-R	Planned Development-Residential
PM_{10}	Particulate matter smaller than 10 microns in diameter
$PM_{2.5}$	Particulate matter smaller than 2.5 microns in diameter
ppv	peak particle velocity
RAQS	Regional Air Quality Strategy
REAP	Rain Event Action Plan
REC	Regional Environmental Conditions
Recuerdos	Recuerdos Research
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDG&E	an Diego Gas & Electric
SIP	State Implementation Plan

SR	State Route
STC	Sound Transmission Class
SUSMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Containments
TDS	total dissolved solids
TIS	Traffic Impact Study
USFWS	U.S. Fish and Wildlife Service
V/C	vehicle to capacity ratio
VdB	vibration decibels
VOCs	volatile organic compounds

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NOTICE OF INTENT TO ADOPT A

MITIGATED NEGATIVE DECLARATION

CASE NO.: ENV15-0011 "Del Prado Project"

DATE ISSUED: March 1, 2016

PUBLIC REVIEW PERIOD: March 4, 2016 – March 23, 2016

LOCATION: The approximately 4.9-acre project site consists of two adjacent but non-contiguous lots that are physically divided by a San Diego Gas & Electric (SDG&E) access driveway that crosses the site. The primarily vacant project site is generally located to the southwest of the intersection of S. Centre City Parkway and Brotherton Road in the City of Escondido (City). The approximately 3.5-acre northern portion of the project (north lot or "Del Prado North") is located along the western side of S. Centre City Parkway, immediately south of Brotherton Road. The approximately 1.4-acre southern portion of the project (south lot or "Del Prado South") is located west of S. Centre City Parkway and south of Del Prado North, and is separated from the north lot by the SDG&E access road that leads to the utility's Felicita substation. The project site encompasses assessor's parcel numbers (APNs) 238-130-11, -26, -27, -35, and -36.

PROJECT DESCRIPTION: The proposed project includes two Tentative Subdivision Maps (due to its location across two separate lots) and a Master and Precise Development Plan addressing the following general elements: (1) construction of 113 attached town home units on two lots, with 81 residences proposed for Del Prado North and 32 residences proposed for Del Prado South; (2) construction of private streets and parking areas within the project site; (3) shared recreational facilities including pool, bathing deck, trellis, BBQ area, and restroom facility; (4) demolition and removal of an existing single-family home located in the northwest corner of the site; and (5) landscaping and bioretention basins to provide flow control and water quality treatment of storm water runoff. Del Prado North is proposed at a density of approximately 24 units per acre, while Del Prado South is proposed at a density of approximately 23 units per acre.

The project would include an amendment to the South Escondido Boulevard Neighborhood Plan to allow an exclusively residential project within the existing Commercial General (C-G) Zone. The project also would include a Zone Change from C-G to Planned Development-Residential (PD-R) to coincide with the Master and Precise Development Plan. The proposed PD zoning would allow for the establishment of unique zoning and development standards for the site.

APPLICANT: Touchstone Communities

An Initial Study has been prepared to assess this project as required by the California Environmental Quality Act (CEQA) and State CEQA Guidelines, as well as related City Ordinances and Regulations. The Initial Study and Draft Mitigated Negative Declaration (IS/MND) are on file in the City of Escondido Planning Division and can be viewed on the City of Escondido website at: http://www.escondido.org/planning.aspx.

FINDINGS: The findings of this review are that the Initial Study identified impacts related to the issues of biological resources, tribal cultural resources, geology and soils, and noise that may be potentially significant, although associated mitigation measures would reduce these potential impacts to less-than-significant levels. All other project impacts studied were found to be less than significant.

Bill Martin
Assistant Planning Director

MITIGATED NEGATIVE DECLARATION

(Case No.: ENV15-0011)
SUPPLEMENTAL COMMENTS

INTRODUCTION

This Mitigated Negative Declaration (MND) assesses the environmental effects of the proposed project, involving the construction of 113 attached residential (townhome) units located on two neighboring lots within one non-contiguous project site in the southern portion of the City of Escondido (Figure 1, *Regional Location*). The two lots (north lot or "Del Prado North" and south lot or "Del Prado South") within the approximately 4.9-acre project site are located southwest of the intersection of Brotherton Road and S. Centre City Parkway. The approximately 3.5-acre north lot is separated from the approximately 1.4-acre south lot by a driveway allowing access to the SDG&E Felicita substation (Figure 2, *Project Location*). The two project lots are primarily undeveloped; however, an existing single-family home in the northwest corner of on the north lot and an existing building pad and parking lot associated with a former restaurant that was located in the southwest portion of the north lot would be demolished and removed as part of the site preparation work (Figure 3, *Project Vicinity*). In addition to the proposed townhomes, the project would include: private streets and parking areas within the project site; shared recreational facilities including pool, bathing deck, trellis, BBQ area, and restrooms; communal landscaping, pedestrian walkways, and entry monument sculpture/signage; and a series of bioretention basins to control and treat storm water runoff. The site is generally bound by Brotherton Road to the north, S. Centre City Parkway to the east, an SDG&E substation and residential uses to the west/southwest, and commercial uses to the south (refer to Figure 3). The proposed project includes two Tentative Subdivision Maps (due to its location across two separate lots) and a Master and Precise Development Plan. An amendment to the South Escondido Boulevard Area Plan to allow for an exclusively residential project would be included in the project, as would a Zone Change from the existing Commercial General (C-G) zoning to Planned Development-Residential (PD-R) site-specific zoning and development standards, with an overall zoning density of approximately 24 dwelling units per acre. An Initial Study Environmental Checklist was prepared for the project and is included as a separate attachment to the Supplemental Comments within this report. The information contained in the Initial Study Environmental Checklist and the Supplemental Comments will be used by the City to determine potential impacts associated with the proposed project.

The detailed Supplemental Comments included in this document identify and evaluate physical impacts to the environment associated with implementing the proposed project based on preliminary review of various environmental factors identified in the attached Environmental Checklist. In analyzing the project, it has been determined that potentially significant impacts related to biological resources, tribal cultural resources, geology and soils, and noise would occur. Based on information and documentation incorporated in the analysis, it has been concluded that this Initial Study warrants issuing a MND in draft form. The MND acknowledges that certain aspects of the project would potentially cause significant impact(s) on the

environment, but that those impacts would be reduced to a less-than-significant level by incorporating identified mitigation measures. The City is the CEQA lead agency for the project.

As mandated by Section 15105 of the State CEQA Guidelines, affected public agencies and the interested public may submit comments on the MND in writing before the end of the 20-day public review period starting on March 4, 2016 and ending on March 23, 2016. Written comments on this environmental document must be submitted to the following address by 5:00 p.m. on March 23, 2016. Following the close of the public review comment period, the City will consider this MND and all received comments in determining whether to approve this project.

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025-2798
Contact: Jay Paul, Associate Planner
Telephone: (760) 839-4537
email: jpaul@escondido.org

Hard copies of this document and all associated technical reports, plans and applicable related materials are available for review during normal hours of operation for the duration of the public review period at the City of Escondido Planning Division. The Draft MND also can be viewed on the City of Escondido website at: http://www.escondido.org/planning.aspx. The following pertinent documents related to the proposed project are also incorporated herein by reference, pursuant to Section 15150 of the State CEQA Guidelines:

- Christian Wheeler Engineering (Christian Wheeler), 2015, Geotechnical Investigation Del Prado. August 31.
- HELIX Environmental Planning, Inc. (HELIX), 2015a, Air Quality and Greenhouse Gas Emissions Calculations for the Del Prado Project, August 17.
- HELIX, 2016, Acoustical Analysis Report for the Del Prado Project, February 23.
- KOA Corporation (KOA), 2015, Del Prado Escondido Traffic Impact Study, August.
- Masson & Associates (Masson), 2015a, Preliminary Drainage Study, July 24.
- Masson, 2016, Storm Water Quality Management Plan for Del Prado, January 29.
- QA(2) Environmental, 2005, Phase I Environmental Site Assessment for Two Vacant Lots on West Side of South Center City Parkway, May 21.
- Recuerdos Research (Recuerdos), 2015, Archaeological and Paleontological Letter Report for a Negative Survey of the Del Prado North and South Project, September 23.

DETAILED PROJECT DESCRIPTION/LOCATION

The approximately 4.9-acre project site is divided into an approximately 3.5-acre north lot and approximately 1.4-acre south lot (i.e., Del Prado North and Del Prado South). The lots are physically separated by an SDG&E driveway used to access the Felicita substation located to

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Regional Location

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N 0 8 Miles

Figure 1

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Project Location

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N 0 2,000 Feet

Figure 2

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Project Vicinity

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N 0 300 Feet

Figure 3

the east of the south lot (refer to Figure 3). The project site is located in the southern portion of the City (refer to Figures 1 and 2). All immediately adjacent areas are within city limits. The project area generally is bound by S. Centre City Parkway on the east, Brotherton Road on the north, a KinderCare child care center and commercial strip mall to the south, single- and multi-family residential uses to the west and southwest, and the SDG&E Felicita substation to the west/southwest (refer to Figure 3). Nearby uses include neighborhood commercial centers to the south, north, and east; a motel; single- and multi-family residential uses; an animal hospital, restaurants, and vacant lots.

The proposed project consists of the construction of 113 attached residential units in a 3-story row townhome design. Del Prado North has an approximate area of 3.5 acres and would consist of 81 units at a density of 24 units per acre. Del Prado South is approximately 1.4 acres and would consist of 32 units at a density of 23 units per acre. To accomplish this, an amendment to the South Escondido Boulevard Neighborhood Plan would be included in the project to allow for exclusively residential development on the currently zoned C-G site, as would a Zone Change from the existing C-G zoning with a minimum residential density of 30 dwelling units per acre to PD-R zoning with a lower residential minimum density of about 24 dwelling units per acre. The project also includes private streets and driveways for vehicular access, 274 parking stalls, private balconies, shared recreational areas including a pool and barbeque area, landscaped and hardscape areas, storm drain improvements, bioretention areas, and monument sculpture/signage. An existing single-family residence located in the northwest corner of the northern lot, along with an existing building pad and parking area associated with a restaurant formerly located in the central portion of the northern lot, would be demolished prior to construction of the proposed townhomes. The project would also restripe parts of Brotherton Road and S. Centre City Parkway, as shown on Figure 4a (*Site/Grading Plan – Del Prado North*). Brotherton Road restriping would include a two-way turning lane for a total of three lanes and the addition of a stop sign and markings just west of the intersection with S. Centre City Parkway. S. Centre City Parkway restriping would include moving the northbound stop sign and markings to the north and adding a striped median around the stop sign.

Grading and Drainage Improvements

The property is located on a gently sloping site with existing elevations ranging from 625 feet above mean sea level (AMSL) to 610 feet AMSL. Development of the site would require minimal grading beyond the remedial grading described below. The existing structures within the site would be demolished as part of the initial site preparation activities, which also would include removal of any remaining materials such as debris and vegetation (i.e., existing non-native shrubs and trees). Based on the recommendations of the site-specific Geotechnical Investigation (Christian Wheeler 2015), the upper five feet of soil from existing grade or proposed grade would be removed to expose competent underlying older alluvium or granitic rock. This would then be replaced with properly compacted fill. Fill could consist of older alluvium soils and undocumented fill from the site if relatively free of organic matter and deleterious material and debris. Deeper removals may be required if dry or loose material is encountered during grading, or if undocumented fill extends to a depth greater than five feet. If deemed necessary, import fill would consist of granular materials with a “very low” to “low” expansion potential.

Site demolition and grading activities are expected to last three months for both portions of the project site. The entirety of the Del Prado North and Del Prado South lots would be graded, removing approximately 12,000 and 2,200 cubic yards (cy), respectively. No blasting would be required. Depending on how the existing soil responds to grading operations, the north lot is

expected to require the export of approximately 4,000 cy of soil, and the south lot is expected to require an import of approximately 2,000 cy of soil. Overall, there is expected to be a net export of approximately 2,000 cy of material from the combined project site. The combined number of truck trips for the grading phase of the project is estimated to be 123 round trips. Three scrapers, two bulldozers, and two loaders would be used during grading.

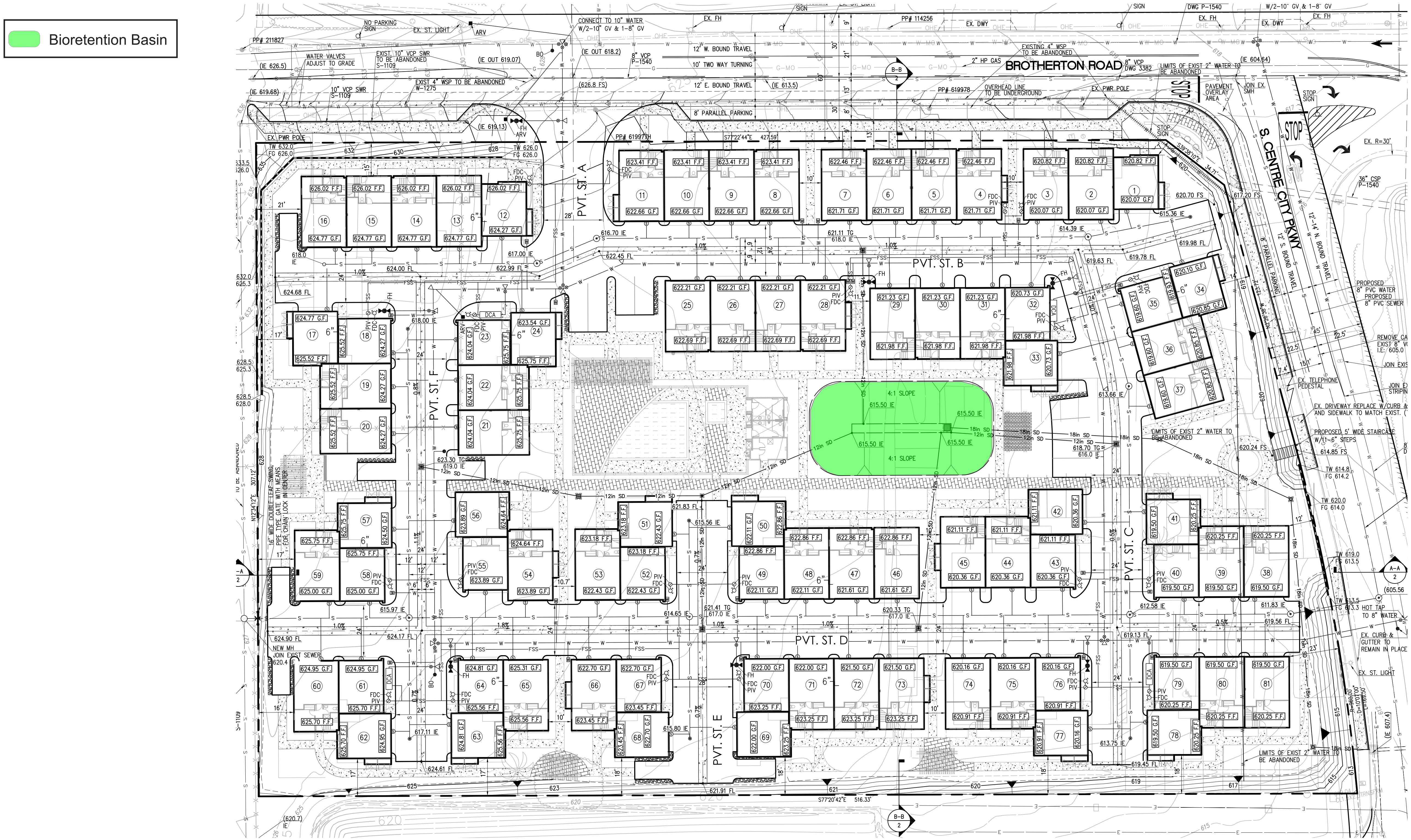
Two existing drainage basins are defined on the site, one on each lot. Both basins currently flow east-southeasterly onto S. Centre City Parkway into existing curb or grate inlets. Proposed on-site drainage for the north lot would allow runoff to drain via street gutters and a proposed storm drain system into a bioretention basin to be located in the middle of the north lot (Masson 2016). Proposed on-site drainage for the south lot would allow runoff to drain via the project's proposed street gutters and storm drain system toward a series of seven bioretention basins. Refer to Figure 4a and Figure 4b (*Site/Grading Plan – Del Prado South)*, respectively for proposed bioretention basin locations. Upon exiting the proposed treatment basins, flows from both lots would be conveyed via the proposed storm drain system to the existing off-site municipal storm drain system. Areas of proposed landscaping around the perimeter of the site would drain towards S. Centre City Parkway and directly into the off-site storm drain system via the associated curb and grate inlets. All runoff from the site would ultimately flow into San Dieguito River and then Lake Hodges.

Construction of the Proposed Project

The proposed project's construction activities, including site preparation and development of both lots, are estimated to take 1.5 years. Demolition within the northern lot would include an existing single-family home. All existing on-site trees, shrubs, and vegetation (disturbed and non-native) also would be removed. Utilities are already located on the site; therefore, no new underground infrastructure is expected to be constructed. No pile driving or blasting would be required during demolition or construction. Construction equipment to be used includes bulldozers, loaders, scrapers, trenchers, compacters, forklifts, cranes, trucks, flatbeds, and generators.

Existing Structure Demolition/Removal

One single-family home is located on the site (northwest corner of north lot; refer to Figure 5a, *Site Photos – North Lot Seen from Brotherton Road*) and would require demolition prior to site grading and construction. As also shown on Figure 5a and Figure 5b, *Site Photos – North and South Lots Seen from S. Centre City Parkway*, a concrete pad and parking lot also are located on the north lot; these also would be removed at the beginning of site preparation. Any debris or deleterious material from demolition would be removed from the site. Furthermore, approximately ten existing trees and several large rocks located on the north lot (refer to Figure 5a); these also would be removed prior to grading or construction. Demolition activities are expected to last for one week. In addition to removal of the house and rocks/trees/vegetation, removal of approximately 900 square feet of asphalt, 250 square feet of concrete walkways, and 1,800 square feet of wood fencing would be required-an estimated total of seven truckloads of vegetation and other cleared materials are to be removed from the project site. It is estimated that an additional five truckloads of demolition debris would be hauled from the site. Equipment for the demolition process would require one medium sized track hoe, loader, and dump truck.



Source: Masson & Associates, Inc., 2016

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Site/Grading Plan - Del Prado North

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Figure 4a

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0 60 Feet

Source: Masson & Associates, Inc., 2016

Site/Grading Plan - Del Prado South

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0 60 Feet

Figure 4b

Looking south across north lot.

Looking southeast across north lot.

Looking south across east side of north lot with existing building pad and asphalt in background.

Looking southwest across north lot with existing house on the right side of the photo.

Site Photos - North Lot Seen from Brotherton Road

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Figure 5a

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Looking north/northwest across north lot.

Looking west/northwest across north lot.

Looking west across south side of north lot/
former restaurant parking lot.

Looking southwest across south lot with SDG&E access road/
driveway on right side of photo

Site Photos - North & South Lots Seen from S. Centre City Parkway

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Figure 5b

Proposed Landscaping

After completion of (and/or in concert with, as feasible) project construction activities, a landscaping and irrigation plan would be implemented for the project site by a qualified landscape contractor. The proposed planting palette would include a mixture of non-invasive and native plants requiring very low to medium water use (In-Site Landscape Architecture 2016). Approximately 100 new trees would be planted throughout the project site. Landscape water conservation measures include the selection of drought tolerant plants and installation of drip irrigation.

Summary of Project-related Equipment and Traffic

A preliminary list of project-related construction equipment includes bulldozers, loaders, track hoe, dump truck, water trucks, forklifts, skip-loaders, delivery trucks, compressors, and scrapers. As detailed above, site demolition and clearing would require hauling of an estimated 12 truckloads of vegetation, materials, and debris from the site. A total of 123 truck round trips are estimated during grading activities. Due to the size of the project site and associated work area, it is anticipated that larger equipment types would be limited on either lot at any given time, with final equipment types and numbers to be determined by the project contractor(s). Based on the previous discussions, a total of approximately 2,000 cy of excavated material/cut hauling would be required for project construction.

Project Purpose and Objectives

The primary purpose of the proposed project is to provide housing by constructing 113 attached housing units on two vacant sites. As previously described, the project would also demolish an existing single-family residence, concrete pad, and parking lot. The project would allow continued access to the neighboring SDG&E substation via retention of an existing driveway.

PAST PUBLIC MEETINGS:

No previous public meetings have been conducted for the proposed project.

ANTICIPATED PUBLIC MEETINGS/HEARINGS:

Planning Commission:

The proposed project is tentatively scheduled for Planning Commission consideration at the April 12, 2016 Commission hearing, after the close of the public comment period. This date is subject to change. A separate public hearing notice will be mailed confirming the Planning Commission time and date.

City Council:

The proposed project is tentatively scheduled for City Council consideration at a future Council meeting after the close of the public comment period. No specific date has been set. A separate public hearing notice will be mailed confirming the City Council time and date.

PROJECT ENVIRONMENTAL SETTING:

The project site consists of two rectangular, vacant lots separated by an SDG&E access driveway (refer to Figures 5a and 5b for existing site photos). Existing vegetation present on the highly disturbed site is non-native and includes weedy grasses and forbs, shrubs, and trees such as mature eucalyptus and palms. Existing on-site development includes a single-family home located on the northwest corner of the north lot. Also on the north lot, a concrete pad and parking lot remains in place from a former restaurant which was located in the southeast portion of the lot. The topography of the site is relatively flat, with the entire site having less than a 10-percent slope. Existing elevations range from approximately 625 feet AMSL near the western site boundary of the site, to approximately 610 feet AMSL along the eastern site boundary where it slopes down towards S. Centre City Parkway. Brotherton Road meets Centre City Parkway at a signalized intersection to the northeast of the site. Access to the site is provided from Brotherton Road and S. Centre City Parkway, which is a two-lane frontage road running parallel to, and immediately west of, Centre City Parkway. Centre City Parkway is designated as a Major Road and is constructed in the site vicinity as a divided roadway with two travel lanes in each direction. Brotherton Road is an unclassified street that lacks some improvements on the southern side of the street where it fronts the project site.

The project site is within an area described as transitional between low-density (primarily single-family) residential uses and commercial uses. Nearby residential sites include low-density residential developments to the west, and some medium-density developments immediately to the south as well as to the east along Centre City Parkway. Commercial developments are located along either side of Centre City Parkway within the site vicinity, with low-density residential neighborhoods located further to the east.

The five parcels that comprise the project site are zoned C-G, with a corresponding City of Escondido General Plan land use designation of General Commercial (GC). These designations are intended to accommodate a wide variety of retail and service activities along major thoroughfares (City of Escondido General Plan 2012a). As described above, the project proponent is seeking an amendment to the South Escondido Boulevard Neighborhood Plan, which currently only allows for residential uses in the C-G Zone if part of a mixed-use development. The project also proposes a Zone Change from the existing C-G zoning with a minimum residential density of 30 dwelling units per acre to PD-R zoning with a lower residential minimum density of approximately 24 dwelling units per acre. Zoning and land use designations in adjacent areas to the north, south, east and west include a mix of single- and multi-family residential and commercial.

I. AGRICULTURE AND FORESTRY RESOURCES

Significance Criteria and Impact Analysis

In determining whether impacts to forest resources, including timberland, are significant environmental effects, the City has referred to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land. The effects of a project on agriculture and forestry resources are considered significant if the proposed project would:

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;*

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract;

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));

d. Result in the loss of forest land or conversion of forest land to non-forest use; or

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The project site is identified as "Urban and Built-up Land" by the Farmland Mapping and Monitoring Program (California Department of Conservation 2013). It is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site also is not involved in a Williamson Act Contract or other agricultural land contract. The project site's land use designation and zoning are tied to commercial uses, with surrounding areas zoned and designated the same or for single- and multi-family medium-density residential uses; there are agricultural or forestry (including timber) uses on site or in the surrounding area. Furthermore, Figure VII-6 of the General Plan does not identify the Project site as an Agricultural Area (City 2012a). No conflicts with existing zoning for agricultural use, forest land, or timberland; or impacts to Farmland, agricultural activity, forest land, or timberland would occur as a result of the proposed project.

II. AIR QUALITY

Significance Criteria and Impact Analysis

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

a. Conflict with or obstructs implementation of the applicable air quality plan;

The project site is located within the San Diego Air Basin (SDAB). The San Diego Air Pollution Control District (SDAPCD) manages air quality in the SDAB. Air quality plans applicable to the SDAB include the San Diego Regional Air Quality Strategy (RAQS) and applicable portions of the State Implementation Plan (SIP). The RAQS and SIP outline the SDAPCD's plans and control measures designed to attain state and federal air quality standards. The RAQS and SIP rely on San Diego Association of Government (SANDAG) growth projections, which are based in part on city and San Diego County (County) general plans. As such, projects that propose development consistent with the growth anticipated by the applicable general plan(s) are consistent with the RAQS and applicable portions of the SIP. In the event that a project proposes development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS.

The applicable general plan for the City is the May 2012 General Plan (City 2012a). The General Plan Environmental Impact Report ([EIR] City 2012b) concluded that the overall increase in housing units and corresponding population associated with the 2012 General Plan would be consistent with the SANDAG projections identified for the City in the 2009 RAQS and

concluded that the 2012 General Plan was therefore consistent with the RAQS. With implementation of the Neighborhood Plan amendment and zone change, the project would result in a lower development intensity (i.e., approximately 24 dwelling units per acre) than accounted for in the 2012 General Plan. As such, the proposed project would be in conformance with the General Plan and would therefore be consistent with the RAQS and applicable portion of the SIP. Based on the foregoing, no impact would occur because the project would not conflict with implementation of applicable air quality plans.

As described below in Section X, *Land Use,* the project includes a zone change from C-G with a minimum density of 30 dwelling units per acre to a less dense PD-R residential project; as well as an amendment to the South Escondido Boulevard Neighborhood Plan, which is a General Plan overlay zone, to allow for exclusively residential development on a site zoned C-G.

b. Violate any air quality standard or contributes substantially to an existing or projected air quality violation;

Construction activities associated with the project would generate short-term emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_X), carbon monoxide (CO), and particulate matter (including both PM_{10}, and $PM_{2.5}$). Emissions would originate from off-road diesel equipment exhaust, employee and material delivery vehicle exhaust, re-entrained paved road dust, fugitive dust from land clearing, and off-gassing from paving activities. Following initial demolition, site preparation, and grading, vertical construction was assumed to occur in two phases. Phase 1 is expected to include the construction of 81 townhomes on the north lot. Construction of Phase 1 is expected to begin May 2017 and require approximately one year to complete. Phase 2 of development is expected to include the construction of 32 townhomes on the south lot. Construction of Phase 2 is expected to begin February 2018 and require approximately one year to complete. Construction activity is subject to the requirements established in Regulation 4, Rules 52, 54, 55, and 67, of the SDAPCD's rules and regulations.

Operational mobile source emissions would originate from traffic trips. California Emission Estimator Model (CalEEMod) defaults for trip length, distribution, and purpose were utilized. CalEEMod default ratios for weekday to weekend trips were applied to trip generation rates as provided in the *Del Prado Escondido Traffic Impact Study* to estimate average daily trips (ADT) (KOA 2015). Operational area source emissions would result from activities such as use of consumer products and landscaping maintenance activities. Operational energy source emissions would result from on-site natural gas usage.

The project's criteria pollutant emissions were calculated using the CalEEMod Version 2013.2.2. The emission sources include construction (off-road vehicles and fugitive dust), mobile (on-road vehicles), area (consumer products and landscape maintenance equipment), and energy (on-site natural gas usage) sources.

The General Plan EIR (as part of mitigation measure Air-1) requires all development projects to include the following construction dust control measures, which were taken into account in the modeling assumptions. These control measures are to be included on all project construction contracts, grading permits, improvement plans, and final maps.

During grading activities for any future development within the General Plan Update planning area boundary, the on-site construction superintendent shall ensure implementation of standard best management practices to reduce the emissions of fugitive dust, including but not limited to the following actions:

- Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water will be applied at a frequency to be determined by the onsite construction superintendent.

- Temporary hydroseeding with irrigation will be implemented on all graded areas on slopes, and areas of cleared vegetation will be revegetated as soon as possible following grading activities in areas that will remain in a disturbed condition (but will not be subject to further construction activities) for a period greater than three months during the construction phase.

- Operate all vehicles on the construction site at speeds less than 15 miles per hour (mph).

- Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer.

- If a street sweeper is used to remove any track-out/carry-out, only PM_{10}-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

The proposed project is smaller than the size listed in Table 4.3-12 of the General Plan EIR that would trigger the need for an air quality assessment (the trigger level for apartment uses with a density of 20 dwelling units/acre is 420 dwelling units; City 2012b). Nevertheless, anticipated project emissions were quantified to further demonstrate consistency with SDAPCD thresholds. Consistent with the General Plan EIR, emissions associated with the project were compared to SDAPCD's "Air Quality Impact Analysis (AQIA) Trigger Levels" as contained within SDAPCD Regulation II, Rule 20.2.

As shown in Table 1, *Estimated Maximum Daily Construction Emissions*, with implementation of construction Best Management Practices (BMPs) for dust control that would be incorporated as a matter or project design and in accordance with SDAPCD Rules, emissions of all criteria pollutants would be below the daily thresholds during construction. Associated construction-related impacts would be less than significant.

Table 1
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Activity	Pollutant Emissions (pounds per day)				
	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	1	9	7	1	1
Site Prep	3	34	26	7	5
Grading	7	83	57	11	7
North Site Paving	3	20	15	1	1
North Site Building Construction	3	21	27	3	2
North Site Architectural Coatings	2	2	3	<0.5	<0.5
South Site Paving	3	17	15	1	1
South Site Building Construction	3	19	25	3	2
South Site Architectural Coatings	1	2	3	<0.5	<0.5
Maximum Daily Emissions	***10***	***117***	***84***	***18***	***11***
AQIA Trigger Levels	75	250	550	100	55

Notes:
VOC and $PM_{2.5}$ thresholds based on County of San Diego Guidelines (County 2007)
Maximum emissions occur when Site Prep and Grading activities overlap.
Source: CalEEMod modeling by HELIX 2015 (output data is provided in Appendix A).

The main operational emissions sources associated with the project are associated with traffic; emissions associated with area sources such as consumer product use and landscaping would also be generated. Table 2, *Estimated Maximum Daily Operational Emissions*, presents a summary of maximum daily operational emissions for the proposed project at full buildout, and compares these emissions with the SDAPCD AQIA Trigger Levels. As shown therein, operational emissions for the proposed project would be substantially below the significance threshold for all criteria pollutants. Therefore, operation of the project would not violate any air quality standard or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. Impacts related to project operation would be less than significant.

Table 2
ESTIMATED MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	Pollutant Emissions (pounds per day)				
	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	8	<0.5	9	<0.5	<0.5
Energy	<0.5	<0.5	<0.5	<0.5	<0.5
Mobile	3	7	33	6	2
Total Daily Emissions	***11***	***8***	***42***	***6***	***2***
AQIA Trigger Levels	75	250	550	100	55

Notes:
VOC and $PM_{2.5}$ thresholds based on County of San Diego Guidelines (County 2007)
Source: CalEEMod modeling by HELIX 2015 (output data is provided in Appendix A).

Due to the anticipated phasing, it is possible that occupation of Del Prado North may occur concurrently with construction of Del Prado South on the south lot. Table 3, *Concurrent Operational and Construction Emissions*, shows the worst-case daily emissions from this potential overlap. As shown therein, the combined construction and operational emissions would be below the significance threshold for all criteria pollutants.

Table 3
CONCURRENT OPERATIONAL AND CONSTRUCTION EMISSIONS

Source	Pollutant Emissions (pounds per day)				
	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$
North Site Operation	4	5	30	4	1
South Site Construction	4	19	27	3	2
Total Daily Emissions	***8***	***24***	***57***	***7***	***3***
AQIA Trigger Levels	75	250	550	100	55

Notes:
VOC and $PM_{2.5}$ thresholds based on County of San Diego Guidelines (County 2007)
Source: CalEEMod modeling by HELIX 2015 (output data is provided in Appendix A).

As shown in Tables 1 through 3, emissions of criteria pollutants during construction and/or operation of the project, whether or not there is an overlap, would not exceed the daily thresholds for any of the criteria pollutants.

Based on the fact that construction emissions would be temporary and localized within the immediate project vicinity, as well as the data presented in the tables above, along with implementation of the noted measures as part of the project design, project-related construction emissions would result in a less-than-significant impact to air quality.

c. *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors);*

d. *Expose sensitive receptors to substantial pollutant concentrations;*

A cumulative impact arises when two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant impacts, meaning that the project's incremental effects must be viewed in connection with the effects of past, current, and probably future projects.

The generation of daily construction and operational emissions associated with cumulative development could result in a cumulative significant impact associated with the cumulative net increase of ozone, PM_{10}, and $PM_{2.5}$ for which the region is in non-attainment. The proposed project would be consistent with the RAQS, which is intended to bring the SDAB into attainment for all criteria pollutants. In addition, the daily emissions generated during construction and operation of the project would not exceed the significance thresholds that have been established as quality of life standards. Therefore, the project's contribution to cumulative air quality impacts would be less than significant.

Impacts to sensitive receptors are typically analyzed for operational period CO hotspots and exposure to diesel particulate matter (DPM). An analysis of the project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hotspots

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at Level of Service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. According to the *Del Prado Escondido Traffic Impact Study*, all are calculated to continue to operate at acceptable LOS with the project (KOA 2015). There would be no potential for a CO hotspot or exposure of sensitive receptors to substantial, project-generated local CO emissions. Associated hotspot impacts would be less than significant.

Exposure to Diesel Particulates

Construction activities would result in short-term, project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment. The California Air Resources Board (CARB) identified DPM as a Toxic Air Contaminant (TAC) in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. Health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, are typically based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project.

As presented earlier in Table 3, maximum daily particulate emissions, which include DPM, would be relatively low when compared to the SDAPCD AQIA Trigger Level. Additionally, the construction period would be relatively short (less than 2 years), especially when compared to 70 years. Combined with the highly dispersive properties of DPM, construction-related emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. Associated impact would be less than significant.

As the proposed project would involve the development of multi-family residential uses, project operation would not introduce any new stationary sources of TACs such as diesel-fueled backup generators that are more commonly associated with large commercial and industrial uses. In addition, the project is sited more than 2,000 feet away from the nearest freeway, well over the 500-foot threshold set by CARB to avoid exposure of residents to TACs. The site is not within buffer distances included in the General Plan EIR that would require preparation of a Health Risk Assessment (within 500 feet of a waste transfer facility or one mile of industrial land uses, medical facilities, or research and development facilities that generate a substantial source of TACs).

As such, the proposed project would not have the potential to expose sensitive receptors to TACs from mobile sources to an extent that health risks could result and associated impacts would be less than significant.

e. Create objectionable odors affecting a substantial number of people.

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. Diesel exhaust and VOCs would be emitted during construction of the project. The odors of these emissions are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not be at a level that would affect a substantial number of people. Further, construction operations would be temporary. As a result, impacts associated with odors during construction would be less than significant.

Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The project would not place sensitive receptors within a close proximity to the listed odor sources. Impacts associated with odor sources would be less than significant.

Based on the foregoing discussions, significant air quality impacts are not anticipated and mitigation measures are not required.

III. BIOLOGICAL RESOURCES

Significance Criteria and Impact Analysis

The effects of a project on biological resources are considered to be significant if the proposed project would:

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 (CDFW) or U.S. Fish and Wildlife Service (USFWS);*

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS;*

c. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

The project site is surrounded by urbanized development (refer to Figure 3). The site itself consists of partially developed, heavily disturbed vacant lots with non-native forbs and grasses, non-native ornamental vegetation, and several mature eucalyptus trees. The majority of the undeveloped portions of the site are characterized by disturbed habitat, consisting of non-native, ruderal (weedy), herbaceous vegetation typical of fallow, vacant lots in urbanized areas of the region. The site is currently subject to regular disturbance associated with noise and lighting from the surrounding developed areas; vegetation maintenance and mowing activities; and pedestrian and off-highway vehicle use. Wildlife species with potential to use the site are expected to be limited to common, non-sensitive wildlife typical of urbanized areas. All of the existing vegetation on the site would be removed prior to the construction of the project. No wetlands as defined by Section 404 of the Clean Water Act occur on the site or would be directly impacted by the proposed project. No sensitive natural communities (including riparian habitat), sensitive plant or animal species, potential jurisdictional waters and wetlands (federally

protected or otherwise), or other sensitive biological resources are known to occur on the site. Impacts to sensitive habitat, wetlands, or natural communities would not occur.

While eucalyptus trees are not considered sensitive, they do provide potential nesting habitat for sensitive raptors which are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG Code). As such, removal of the existing eucalyptus trees would represent a potentially significant impact if removal occurs during the raptor nesting season (January 15 through July 31). Direct impacts could occur as a result of removal of vegetation supporting an active nest. There also are existing eucalyptus trees immediately off site that could provide nesting habitat; accordingly, indirect impacts could occur as a result of construction noise and vibration in the immediate vicinity of an active nest, such that the disturbance results in a nest failure. These impacts would be considered significant in violation of the MBTA and CFG Code and would require mitigation in the form of avoidance of nesting raptors.

Mitigation Measures

Because the project would have the potential to impact common (non-sensitive) nesting raptors, the following measure shall be implemented:

BIO-1 **Avoidance of Nesting Raptors**. To prevent impacts to nesting raptors protected under the federal MBTA and CFG Code, the City shall enforce the following:

1. If construction occurs during the raptor nesting season (January 15 through July 31), and where any mature tree or structure capable of supporting a raptor nest occurs within 500 feet of proposed project construction activities, the project applicant shall retain a qualified biologist to conduct a pre-construction survey for nesting raptors prior to clearing, grading and/or construction activities. The survey shall be conducted within 72 hours prior to the start of construction. The project applicant shall not be responsible for physically surveying off-site habitat where access is not permitted; the qualified biologist shall visually inspect these off-site areas with the aid of binoculars or a spotting scope.

2. If any nesting raptors are present on or within 500 feet of the proposed project construction area, the project applicant shall retain a qualified biologist to flag and demarcate the location of all nesting raptors and monitor construction activities. Active nests within off-site areas where access is not permitted shall not be flagged or demarcated. Temporary avoidance of active raptor nests, including the enforcement of an avoidance buffer of 500 feet, shall be required until the qualified biologist has verified that the young have fledged or the nest has otherwise become inactive. The avoidance buffer may be reduced at the discretion of the qualified biologist and with written consent from the USFWS and CDFW. If the qualified biologist determines that a narrower buffer is warranted, the qualified biologist shall provide USFWS and CDFW with a written explanation as to why. Based on the submitted explanation, USFWS and CDFW would determine whether to allow the narrower buffer. Avoidance buffers for active nests within off-site areas where existing developments already occur shall not be required.

With implementation of mitigation measure BIO-1, impacts to sensitive species would be less than significant.

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;

The developed project site is within a heavily urbanized commercial corridor and immediately adjacent to moderate-density residential areas; it does not serve or contribute to any wildlife corridors or linkages in the local or regional area. The disturbed project site does not contain any native natural communities and does not support native wildlife corridors or nursery sites, and building the proposed project would not impede the use of nursery sites in the local or regional area. No associated impacts would occur.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

Section 33-1068 of Article 55 in the Escondido Zoning Code places restrictions on the removal of vegetation, including the removal of mature trees. The project grading permit would serve as the vegetation removal permit. Trees would be replaced in conformance with the City's grading ordinance at a minimum 1:1 ratio. Associated impacts would be less than significant.

f. Conflict with provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved state, regional, or local habitat conservation plan.

The generally vacant project site is located on developed/disturbed land and entirely surrounded by existing urbanized development. The site is located within the boundaries of the Draft Escondido Multiple Habitat Conservation Program (MHCP) Subarea Plan; however, this plan has not yet been approved or adopted. Nevertheless, the site occurs entirely within an urbanized area and is not located within any of the Focused Planning Areas or other areas of biological importance identified in the MHCP. Therefore, the project would not conflict with any Habitat Conservation Plan, Natural Conservation Community Plan, or any other approved local, regional, or state habitat conservation plan. No impacts would occur.

IV. CULTURAL RESOURCES

An Archaeological and Paleontological Letter Report for a Negative Survey of the Del Prado North and South lots has been prepared for the proposed project by Recuerdos Research (Recuerdos 2015). The letter report documents the results of a records search and September 2015 field survey. The letter report is summarized below and the complete report is included in Appendix B of this document.

Significance Criteria and Impact Analysis

The effects of a project on cultural resources, including historical/archaeological, paleontological, and tribal cultural resources, are considered to be significant if the proposed project would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;

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

Historical Resources

According to §15064.5 of the State CEQA Guidelines, substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. The north lot of the project site contains one house that was constructed in 1953 (Recuerdos 2015). The house is a single-family home typical of suburban homes in the area. The house does not represent a unique or outstanding architectural style and is not associated with persons important in the history of Escondido. Furthermore, the existing house is not identified as a significant cultural historic site in the City's General Plan EIR, and the Resource Conservation chapter of the General Plan does not designate the site as significantly historic or as part of the designated Old Escondido Neighborhood. No historical resources were recorded at the South Coast Information Center or as a result of the field survey (Recuerdos 2015). No impacts to historical resources would occur.

Archaeological Resources

Although the Recuerdos report notes that it is known that several Luiseño and Kumeyaay Indian sites are located along Escondido Creek to the north and the San Dieguito River to the south, it further notes that past research has indicated that the immediate vicinity was rarely inhabited. The results of the records search were negative; no archaeological resources were recorded on or near the project site; the field survey also was negative (Recuerdos 2015). Due to the partially developed and overwhelmingly disturbed nature of the project site, the potential for undiscovered subsurface archaeological resources is low; however, the potential still exists for discovery of unknown resources during site work. In the unlikely event that subsurface resources are encountered during construction activities, the project would comply with §15064.5 of the State CEQA Guidelines. Associated impacts would be less than significant.

c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Paleontological Resources

The proposed project is located in the Peninsular Ranges Geomorphic Province in an area underlain by Cretaceous granitic rock. Additional geologic/surficial units present within the site include artificial fill (e.g., in association with existing/previous development), and older alluvium (Christian Wheeler 2015; refer to Section VI and Appendix C for additional discussion of geologic units). The described geologic setting with a mixture of recent alluvial soils and older granitic base soils generally is not conducive to significant paleontological remains (Recuerdos 2015), as paleontological resources are typically associated with sedimentary rock and related deposits. Because of the igneous nature of local bedrock and the age and origin of fill deposits, these materials exhibit no potential for the occurrence of sensitive paleontological resources. Specifically, igneous rocks have a molten origin and fill deposits are recent in age and generated through mechanical processes, with neither of these materials conducive to fossil formation/preservation. Furthermore, the general area is not known to have produced significant or substantial paleontological discoveries (Recuerdos 2015). Based on information provided in the City General Plan EIR (City 2012b), older alluvial deposits exhibit a moderate potential for sensitive paleontological resources, with units rated as moderate "…known to contain paleontological localities…" and "…judged to have a strong, but often unproven, potential for producing unique fossil remains." While this information may apply in some areas, the existing soils on the site exhibit no potential for the occurrence of sensitive paleontological resources;

furthermore, Escondido and the general project area is not known to contain or have produced any significant paleontological resources or discoveries. Accordingly, the potential for discovery of unknown fossils during project ground disturbance would be considered relatively low to negligible. Associated impacts would be less than significant and no mitigation would be necessary.

Unique Geological Features

Unique geological features generally are defined to include geologic structures, formations, or other features that exhibit unusual or important characteristics in the context of scientific information (e.g., rare geologic/mineral assemblages or structural features), economic considerations (e.g., economically valuable mineral deposits), or cultural perception (e.g., prominent, unusual, and/or aesthetically pleasing rock outcrops or exposures). Because the project site is generally level and does not encompass any distinct or unique geologic characteristics, information or features as described, no associated impacts would result from proposed development.

d. Disturb any human remains, including those interred outside of formal cemeteries.

No cemeteries, formal or informal, have been identified on site or within the project vicinity. It is not anticipated that human remains would be encountered on the project site during construction-related activities. If human remains are encountered during the excavation and remedial grading stage of the project, however, the project would comply with §15064.5 of the State CEQA Guidelines, California Public Resources Code §5097.98, and California Health and Safety Code §7050.5 regarding the discovery and disposition of human remains. Associated impacts would be less than significant.

e. Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code §21074?

Consultation with a California Native American Tribe that has requested such consultation with a lead agency may assist the lead agency, in this case the City, in determining whether the project may adversely affect Tribal Cultural Resources and, if so, how such effects may be avoided or mitigated. Whether the project would cause a substantial adverse change in a site, feature, place, cultural landscape, sacred place, or object, with cultural value to a California Native American Tribe (i.e., Tribal Cultural Resource), must be addressed in this document, whether or not formal consultation has been requested by a Native American Tribe.

In accordance with Assembly Bill (AB) 52, the City of Escondido notified three Native American Tribes (San Luis Rey Band of Mission Indians; Rincon Band of Luiseño Indians; and Soboba Band of Luiseño Indians) that previously requested notification of proposed projects within the City. Representatives of the San Luis Rey Band of Mission Indians responded to the City and requested that formal consultation with the Tribe be conducted to discuss the cultural analysis prepared for the project, potential project impacts to Tribal Cultural Resources, and mitigation measures to reduce potential impacts to a less than significant level. The results of the consultation indicated that the project has the potential to impact Tribal Cultural Resources within the project area. Potential impacts to unidentified and unknown Tribal Cultural Resources within the project area are considered potentially significant; accordingly, the following mitigation measures, which were developed during the described consultation, would be implemented by the project applicant to reduce such impacts to below a level of significance:

CUL-1 The City of Escondido Planning Division ("City") recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

CUL-2 Prior to issuance of a grading permit, the applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the project archaeologist that confirms the selected Native American monitor is associated with a TCA Tribe. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

CUL-3 The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

CUL-4 During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

CUL-5 In the event that previously unidentified Tribal Cultural Resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

CUL-6 If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

CUL-7 The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant Tribal Cultural Resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

CUL-8 As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

CUL-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified Archaeologist does not collect the cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any Tribal Cultural Resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

CUL-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor shall

be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

V. GEOLOGY AND SOILS

Significance Criteria and Impact Analysis

A Geotechnical Investigation was prepared for development of the project site by Christian Wheeler (2015) and is summarized below, with the complete report included as Appendix C of this analysis. The Geotechnical Investigation concludes that the site is "suitable for the proposed development provided the geotechnical recommendations presented in this report are followed." Accordingly, the report identifies a number of recommendations associated with seismic and non-seismic concerns, to address potential impacts and provide conformance with associated regulatory standards. These include efforts such as standard plan review; pre-construction meetings; design and construction measures to implement regulatory/industry criteria; remedial grading; and site-specific geotechnical observations and testing during project excavation, grading, and construction activities. Applicable geotechnical recommendations are summarized below as appropriate, with additional detail provided in Appendix C.

The effects of a project on geology and soils are considered to be significant if the proposed project would:

a. *Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:*
    i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);*
    ii. *Strong seismic ground shaking;*
    iii. *Seismic-related ground failure, including liquefaction; or*
    iv. *Landslides.*

Ground Rupture

The project Geotechnical Investigation concludes that "no active or potentially active faults are known to traverse the subject site." Active faults are defined as those exhibiting historic seismicity or displacement of Holocene materials (less than approximately 11,000 years old), while potentially active faults have no historic seismicity and displace Pleistocene (between approximately 11,000 and 2 million years old) but not Holocene strata. The closest active faults to the project site are associated with the Newport-Inglewood and Rose Canyon faults, approximately 15 miles to the west. The noted Earthquake Fault Zone designations are generally intended to "[r]egulate development near active faults so as to mitigate the hazard of surface fault rupture" (California Geological Survey [CGS], 2007). The closest CGS Earthquake Fault Zones to the project site are located along onshore sections of the Rose Canyon Fault approximately 20 miles to the southwest. Based on the described conditions, the potential for on-site ground rupture is considered negligible. Accordingly, associated potential impacts would be less than significant.

Ground Acceleration

The project site is within a seismically active region, and is potentially subject to strong ground acceleration (ground shaking) from earthquake events along major regional faults. Ground acceleration is expressed in terms of "g" forces, where g equals the acceleration due to gravity. The project Geotechnical Investigation notes that "…the site is located in an area that is relatively free of geological hazards that will have a significant effect on the proposed development…" but the report also concludes that "…the most likely geological hazard that could affect the site is ground shaking due to seismic activity along one of the regional active faults." The analysis concludes that "…construction in accordance with the requirements of the most recent edition of the California Building Code (CBC) and the local government agencies should provide a level of life-safety suitable for the type of development proposed." (Christian Wheeler 2015).

The Geotechnical Investigation goes on to state that grading should conform to the guidelines in Appendix J of the CBC, the minimum requirements of the City of Escondido, and the recommended specifications and provisions of the project-specific report, including: (1) appropriate site preparation (e.g., clearing/grubbing and removal of buried structures and significant root material); (2 implementation of geotechnical observation/testing and remedial grading as applicable; (3) appropriate excavation parameters, such as removal/replacement and/or recompaction of unsuitable materials including fill and applicable areas of older alluvium (at minimum, the upper five feet of existing soil shall be removed unless granitic rock is exposed at the base of removal); (5) proper engineered fill composition/placement methodology; and (6) appropriate design and construction of structures, foundations, trenches, manufactured slopes, retaining walls, pavement, and drainage/irrigation facilities (with detailed recommendations provided in Appendix C). These recommendations, which would be implemented as a matter of project design, are to be included on all project construction contracts, grading permits, improvement plans, and final maps. Based on conformance with these recommendations and related regulatory standards as part of the project design and construction requirements, potential impacts related to seismic ground acceleration from implementation of the proposed project would be less than significant.

Liquefaction and Related Effects

Liquefaction and related effects such as dynamic settlement can be caused by seismic ground shaking. Loose (cohesionless), saturated, and granular (low clay/silt content) soils with relative densities of less than approximately 70 percent are the most susceptible to these effects. Liquefaction results in a rapid pore-water pressure increase and a corresponding loss of shear strength, with affected soils behaving as a viscous liquid. Surface manifestations from these events can include loss of support for structures/foundations, excessive (dynamic) settlement, and other effects such as lateral spreading (horizontal displacement on sloped surfaces as a result of underlying liquefaction). Based on such factors as depth to the groundwater table, the dense nature of on-site alluvial deposits and underlying bedrock, and grain-size distribution, the project Geotechnical Investigation concludes that the near-surface soils encountered at the site are not considered susceptible to liquefaction and related effects. As a result, potential impacts from liquefaction and related effects associated with project implementation would be less than significant.

Landslides

The project site and adjacent areas are relatively level, with on-site elevations ranging from approximately 607 to 635 feet above mean sea level. However, the project Geotechnical Investigation notes that the project site is located in Relative Landslide Susceptibility Area 2 according to the *Landslide Hazards in the Northern Part of the San Diego Metropolitan Area* (Tan 1995). Although Area 2 is considered to be "marginally susceptible" to landsliding, the project Geotechnical Investigation concludes that "…the potential for slope failures within the site is very low." Accordingly, potential impacts related to landslide hazards associated with project implementation would be less than significant.

b. Result in substantial soil erosion or the loss of topsoil

Implementation of the proposed project would increase the potential for erosion and transport of eroded material (sedimentation) both within and downslope of the project site. Specifically, proposed activities may involve: (1) removal of surface stabilizing features (e.g., vegetation); (2) excavation of compacted materials; and (3) redeposition of excavated and/or imported material as backfill in proposed development areas. While graded/excavated areas and fill materials would be stabilized through efforts such as compaction and installation of structures/hardscape and landscaping, erosion potential would be higher in the short-term than for existing conditions. Developed areas would be especially susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Erosion and sedimentation are not considered to be significant long-term concerns for the proposed project, as developed areas would be stabilized through installation of structures/hardscape and landscaping as noted. The off-site transport of sediment also could potentially result in effects to downstream receiving water quality, such as increased turbidity and the provision of a transport mechanism for other contaminants that tend to adhere to sediment particles (e.g., hydrocarbons). Additional discussion of potential water quality effects associated with project-related erosion and sedimentation is provided below in Section IX.

Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City storm water program and related National Pollutant Discharge Elimination System (NPDES) standards. Specifically, this would entail implementing appropriate measures to comply with requirements identified in sources that may include: (1) Section 33 of Article 55 (Grading and Erosion Control) of the City Municipal Code; (2) the City Jurisdictional Urban Runoff Management Plan (JURMP, 2008) and related storm water standards; and (3) the NPDES Construction General Permit (NPDES No. CAS000002, State Water Resources Control Board [SWRCB] Order 2009-0009-DWQ, as amended).

Conformance with the noted NPDES and City standards is required prior to development of applicable sites exceeding one acre, and typically includes measures such as implementing an approved Storm Water Pollution Prevention Plan (SWPPP), an associated Construction Site Monitoring Program (CSMP), employee training, and minimum BMPs, as well as a Rain Event Action Plan (REAP) for applicable projects (i.e., those in Risk Categories 2 or 3 outlined below). Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., erosion potential and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the off-site discharge of pollutants (including sediment). Depending on the risk level, these may include mandatory technology-based action levels, effluent limitations, and advanced treatment

systems (ATS). Specific pollution control measures require the use of best available technology (BAT) economically achievable and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through applicable BMPs. While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the Construction General Permit, as well as additional sources including the City of Escondido Standard Urban Storm Water Mitigation Plan (SUSMP; City 2011), and the California Storm Water Quality Association (CASQA) Storm Water Best Management Practices Handbooks (CASQA 2009). Specific requirements for the proposed project under this permit would be determined during SWPPP development, after completion of project plans and application submittal to the SWRCB.

Typical erosion and sediment control measures that may be required in the project SWPPP include the following: (1) seasonal grading restrictions during the rainy season (October 1 to April 30) for applicable areas; (2) preparation and implementation of a CSMP and, if applicable, a REAP to provide enhanced erosion and sediment control measures prior to predicted storm events; (3) use of erosion control/stabilizing measures such as geotextiles, mats, fiber rolls, or soil binders; (4) use of sediment controls to protect the site perimeter and prevent off-site sediment transport, including measures such as silt fencing, fiber rolls, gravel bags, temporary sediment basins, street sweeping, stabilized construction access points and sediment stockpiles, and use of properly fitted covers for sediment transport vehicles; (5) compliance with local dust control measures, and (6) implementation of additional BMPs as necessary to ensure adequate erosion/sediment control and regulatory conformance.

Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, the project SWPPP and related City and NPDES requirements, associated potential erosion and sedimentation impacts would be avoided or reduced below a level of significance.

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

Based on the previously described nature and location of proposed facilities and the Geotechnical Investigation conclusions, project area soil and geologic conditions are generally suitable for proposed development, provided that proper design and construction measures are implemented. Potential liquefaction (and related effects such as lateral spreading) and landslide impacts are discussed above in association with items a.iii and a.iv of this section.

Potential impacts related to subsidence are not significant, based on the following considerations: (1) subsidence is typically associated with conditions such as groundwater (or other fluid) withdrawal, with such activities not proposed as part of the project and shallow groundwater not observed or expected to occur on site; (2) while the noted effects can also be associated with loading related to placement of larger surface structures, the project site is underlain by dense alluvium and granitic bedrock, which are generally not subject to subsidence; and (3) potentially less stable materials present within the project area (fill and surficial alluvium) would be addressed through the required inclusion of geotechnical recommendations and conformance with applicable regulatory requirements (as described in association with item a of this section and the project Geotechnical Investigation in Appendix C). Specifically, such measures would include provisions related to the removal of unsuitable materials; composition and placement methodology (e.g., compaction) of materials used as

backfill; and appropriate seismic, manufactured slope, retaining wall, drainage, structure, foundation, and pavement design, pursuant to standards from regulatory/industry sources including the City and CBC. Conformance with the described geotechnical recommendations and regulatory/industry standards as a matter of project design would effectively avoid or reduce potential subsidence impacts below a level of significance.

Temporary excavations associated with proposed project construction (e.g., utility trenches) may involve vertical or near-vertical walls, and can exhibit instability and the potential for collapse related to loose or unstable soil and geologic materials. Such instability can be exacerbated through effects such as the potential occurrence of jointing and fracturing in local bedrock. The project Geotechnical Investigation identifies a number of recommendations to address potential instability in temporary excavations, including conformance with applicable Occupational Safety and Health Administration (OSHA) requirements such as slope limitations and shoring requirements. Conformance with these recommendations and associated regulatory requirements would avoid or reduce potential impacts related to temporary excavation stability below a level of significance.

An additional consideration for geologic stability involves the improper use of oversize materials in fill, which can result in effects such as differential compaction (varying levels of compaction over short distances) that may adversely affect surface and subsurface structures. The project Geotechnical Investigation identifies a number of standard industry recommendations to address these potential effects, including maximum rock size restrictions for fill materials, and inspection of fill by the project geotechnical engineer. Conformance with these recommendations and related regulatory (CBC) and industry standards would avoid or reduce potential impacts from oversize materials below a level of significance.

Corrosion testing for sulfate content in on-site materials was conducted as part of the project Geotechnical Investigation (Appendix C). Based on the resulting laboratory analysis, the tested parameters were below established CBC thresholds for corrosive concerns related to sulfate; such levels are considered “negligible.” The analysis also notes, however, that “…Christian Wheeler Engineering does not practice corrosion engineering…and we recommend that the client retain an engineering firm that specializes in this field to consult with them on this matter.” Should such soils be present on the site, long-term exposure to soils with corrosive properties related to sulfates, as well as other factors including pH, chloride and resistivity values (i.e., the ability to restrict, or resist, electric current) could potentially result in deterioration and eventual failure of underground concrete and metal structures (such as foundations or utility lines); this would represent a potentially significant corrosive soils impact. Potentially significant impacts associated with hazards related to corrosive soils would be reduced to a level below significance through the following mitigation measure.

GEO-1 **Implementation of Geotechnical Recommendations.** The site-specific Geotechnical Investigation includes a number of general and specific recommendations that shall be implemented in the design and construction of the proposed project to minimize (a) the potential for exposure to soils with corrosive properties and associated potential for deterioration and eventual failure of underground concrete and metal structures, and (b) the potential concern associated with expansive soils on site, as summarized herein. Corrosion recommendations that shall be implemented include, but are not limited to: (1) further testing by a firm that specializes in corrosion engineering to determine next steps associated with corrosive soils, if any. Expansive soils recommendations that shall be implemented include, but are not limited to: (1) removal of unsuitable materials during site preparation and grading; (2) confirmation that fill

material exhibits "very low" or "low" expansion potential (per CBC standards); and (3) testing of proposed fill materials for suitability (including expansion potential). Finally, site grading plans shall be reviewed by a qualified geotechnical consultant prior to final design submittal to determine if additional analysis and recommendations beyond those summarized above (and listed in full in the Geotechnical Investigation) are required. Any and all geotechnical recommendations shall be fully implemented in accordance with applicable industry/regulatory standards (e.g., CBC requirements).

Implementation of this measure would effectively avoid or reduce potential impacts from corrosive soils to below a level of significance.

d. Be located on expansive soil, as defined in Section 1802.3.2 of the International Building Code, creating substantial risks to life or property;

Expansive (or shrink-swell) behavior in surface or near-surface materials is attributable to the water holding capacity of clay materials. Such behavior can adversely affect structural integrity (including underground pipelines) through shifting of foundations or supporting materials during the shrink-swell process. The project Geotechnical Investigation acknowledges that the anticipated foundation soils are expected to have a low expansive potential based on CBC criteria. Implementation of mitigation measure GEO-1, above, however, would reduce or avoid potentially significant impacts associated with construction on potentially expansive soils to below a level of significance; no additional mitigation is required.

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 wastewater.

The proposed project would include connections to the existing municipal sewer system, and would not involve the use of septic tanks or alternative wastewater disposal systems. Accordingly, no related impacts would result from project implementation.

VI. GREENHOUSE GAS EMISSIONS

Significance Criteria and Impact Analysis

a. Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The proposed project would generate GHG emissions from a variety of sources. First, GHG emissions would be generated during construction of the project. Once fully operational, the project's operations would generate GHG emissions from both area sources and mobile sources. Indirect emissions associated with the proposed residential uses include electrical consumption, water usage and wastewater generation, and solid waste disposal.

Based on a review of Appendix B of the *City of Escondido Greenhouse Gas Emissions Adopted CEQA Thresholds and Screening Tables* document (City 2013), it was determined that it would generally require up to 120 condominium/townhome dwelling units in order to generate 2,500 metric tons (MT) of carbon dioxide equivalents (CO_2e) per year. Given that the proposed

project would only consist of the development of 113 condominium/townhome dwelling units, it is concluded that the GHG emissions generated by the project would be less than significant, provided that the project implements the efficiency measures required in the Escondido Climate Action Plan (E-CAP; City 2013) CEQA Thresholds for small projects:

- Energy efficiency of at least five percent greater than adopted Title 24 requirements; and
- Water conservation measures that match the CALGreen Building Code in effect as of January 2011.

As noted in the list of project design measures (see pages 59-61 of this MND), the project would achieve energy efficiency beyond current 2014 Title 24 standards. The water conservation measures required in the current 2014 CALGreen building code match or exceed the water conservation measures from the 2011 CALGreen building code. Nonetheless, pursuant to full disclosure under CEQA, the estimated construction and operational GHG emissions associated with the project have been quantified as part of this analysis to further confirm that the total annual emissions of the project would not exceed 2,500 MT CO_2e per year.

The proposed project consists of the construction of 113 condominium/townhouse dwelling units. The project's construction GHG emissions were estimated using the same assumptions and methods as the air quality analysis and shown in Table 4, *Estimated Project Related GHG Emissions.* As shown in Table 4, the total GHG emissions that are anticipated from construction of the proposed project would be approximately 1,332 MT CO_2e.

During operations, area and indirect emissions sources associated with the proposed project would primarily result from electricity and natural gas consumption, water and wastewater transport, and solid waste generation. GHG emissions from electricity consumed on site by the proposed project would be generated offsite by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport are also indirect emissions resulting from the energy required to transport water from its source, and the energy required to treat wastewater and transport it to its treated discharge point. In addition, the residential uses at the project site would also generate mobile source emissions from motor vehicle trips generated by residents and visitors. The various operational GHG emissions associated with the proposed project are shown in Table 4. Overall, the proposed project's total annual GHG emissions resulting from construction and operational activities would be 1,406 MT CO_2e per year.

Table 4 ESTIMATED PROJECT RELATED GHG EMISSIONS	
Emission Sources	**Emissions (MT CO_2e)**
Construction	
Total	1,332
Construction (amortized over 30 years)	*44*
Operations	
Area Sources	**1**
Energy Sources	**258**
Mobile Sources	**1,046**
Waste Sources	**12**
Water Sources	**45**
Operational Subtotal	*1,362*
Total Annual Project Emissions	***1,406***
City Screening Threshold	**2,500**
Significant Impact?	**No**

Note: Totals may not add up exactly due to rounding.
CalEEMod outputs provided in Appendix A

As shown in Table 4, the project's construction and operational GHG emissions would not exceed the City's threshold of 2,500 MT CO_2e per year. Thus the proposed project would not result in the generation of substantial levels of GHG emissions and would not result in emissions that would adversely affect the statewide attainment of GHG emission reduction goals of AB 32. This impact would be less than significant.

As discussed above, the GHG emissions generated by the proposed project would not exceed the City's 2,500 MT CO_2e per year screening threshold. As the threshold has been developed as part of the E-CAP development review process, the project would not interfere with implementation of the E-CAP. Consequently, the implementation of the project would not hinder the ability of the State to achieve AB 32's goal of achieving 1990 levels of GHG emissions by 2020. In addition, once the energy and water consumption reductions from compliance with the mandatory requirements of CALGreen are accounted for, the GHG emissions associated with the proposed project would be even lower.

Consistency with CARB Scoping Plan

Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the project would be Actions E-1 and GB-1 (CARB 2014). CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aims to reduce electricity demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The proposed project would be required to include all mandatory green building measures for new residential developments under the CALGreen Code. Therefore, the proposed project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

Consistency with City of Escondido Climate Action Plan

As discussed previously, the E-CAP serves as an implementation tool of the city General Plan to guide development in the City to meet the objectives of conserving resources and reducing

GHG emissions. Following the State's adopted AB 32 GHG reduction target, the E-CAP sets a goal to reduce its GHG emissions back to 1990 levels by the year 2020. This target was calculated as a 15-percent decrease from 2005 levels, as recommended in the AB 32 Scoping Plan. In order to reduce its GHG emissions by 15 percent from 2005 levels by 2020, the City estimated the community-wide emissions for the year 2020, based on population and housing growth projections associated with the assumptions used in the City's General Plan Update, which was completed in 2012. Through this forecast, the City was able to determine the amount of GHG emissions that would need to be reduced in order for the city to reach its reduction target by 2020.

Because development of the proposed project would be consistent with the land use designation for the project site identified in the City's General Plan Land Use and Community Form Element that allows for residential and commercial development, the GHG emissions associated with the project would have already been accounted for in the City's future emissions forecast. As such, implementation of the proposed project would be consistent with the E-CAP. Additionally, because the GHG emissions generated by the proposed project would not exceed the 2,500 MT CO_2e per year threshold established in the E-CAP and the project would include the two required measures found in the City E-CAP CEQA thresholds (City 2013), the project would not hinder the City's ability to reduce its GHG emissions in accordance with AB 32 requirements. Therefore, implementation of the proposed project would not adversely affect the statewide attainment of GHG emission reduction goals of AB 32 and associated impacts would be less than significant.

VII. HAZARDS AND HAZARDOUS MATERIALS

Significance Criteria and Impact Analysis

The effects of a project on hazards and hazardous materials are considered to be significant if the proposed project would:

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*

b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*

The proposed project entails development of a residential site, and would generally not involve the transport, use, release or disposal of hazardous materials. Long-term project operation would potentially involve the use of chemical pesticides in certain instances (e.g., landscape maintenance), although the project includes measures to minimize and control such use, as outlined below in Section IX.

Project construction and demolition would involve the on-site use and storage of related hazardous materials such as vehicle/equipment fuels. Applicable regulatory requirements associated with the routine transport, use, or disposal of hazardous materials during construction- and demolition-related activities would be met through implementation of a SWPPP and related BMPs as described below in Section IX. The existing on-site house, which was built in 1953, may contain hazardous materials such as asbestos and lead-based paint. During demolition activities, these materials may be accidentally released into the environment. Before demolition, appropriate testing would be conducted to determine if asbestos and lead-

based paint are present; if found, the materials would be removed and disposed of in accordance with all federal, state, and local regulations.

Based on review of the Government Code Section 65962.5 (Cortese List) data bases, no listed hazardous material/waste sites are located within the project site, although there are several nearby listed sites (California Environmental Protection Agency [CalEPA] 2015). As outlined below under Item d of this section, however, all but one of these listed sites are designated as "case closed" and the active site does not include soil or groundwater contamination that would be affected by proposed project development. It should also be noted that a Phase I Environmental Site Assessment (ESA) was conducted for a previously proposed project in the 1.43-acre southern portion of the site in 2005. This investigation concluded that no evidence of Recognized Environmental Conditions (RECs) or Historical Recognized Environmental Conditions (HRECs) was observed, and no further investigation was recommended ([QA]2 Environmental 2005).

Based on the described conditions, associated project-related impacts related to the transport, use, release or disposal of hazardous materials 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;*

There is one existing school (preschool/daycare) located within one-quarter mile of the project site; Escondido KinderCare at 2415 S. Centre City Parkway (adjacent to the southern portion of the project site). No other known existing or proposed schools are located within one-quarter mile of the project site, with the closest nearby schools located approximately 0.3 mile to the west (Miller Elementary School), 0.6 mile to the north (Juniper Elementary School), 0.75 mile to the northwest (First Years Preschool) and 0.8 mile to the southeast (LR Green Elementary School and Bear Valley Middle School). Based on the described conditions and the information provided above under Items a. and b. of this section, potential project-related impacts from hazardous material/waste use, handling, or emission in association with existing or proposed schools would be less than significant.

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

Cortese List

As noted above under items a and b of this section, a search of the Government Code Section 65962.5 (Cortese List) data bases did not identify any on-site listings, although there are a number of nearby sites as outlined below (CalEPA 2015).

- Blue Ribbon Investments, Inc. (T0607301190). This site is a former ARCO facility (No. 1948) located at 2306 South Escondido Boulevard (approximately 150 feet east of the project site), and is listed for a release of gasoline from a leaking underground storage tank (LUST). Both soil and groundwater were affected by this release, although the soil contamination is limited to the subject property, and the local groundwater gradient is to the southeast (i.e., away from the proposed project site, Stantec 2013). Accordingly, the maximum identified groundwater contamination plume does not extend west of South Escondido Boulevard, and is thus not within or adjacent to the proposed

project site (Stantec 2013). This case is identified as "open" and remediation/monitoring is ongoing.

- Blue Ribbon Investments, Inc. (T0608107392, T0608119285, T0608177469). These three LUST sites are located at 2306 South Escondido Boulevard (approximately 150 feet east of the project site), with one site listed for release of gasoline (T0608177469), no contaminates identified for the other two sites, and no affected media (i.e., soil or groundwater) identified for any of the three sites. All three listings are identified as "case closed" with associated closure dates of between September 1987 and November 1989.

- Brotherton Plaza (T0808141457). This is a LUST site with no specified contaminants or affected media located at 2250 South Escondido Boulevard (approximately 160 feet northeast of the project site). This listing is identified as "case closed" with a closure date of April 5, 2001.

- Centax Homes, Vacant Lot (T06019712312). This is a LUST site for waste oil contamination of soil located approximately 375 feet south of the project site (with no associated address). This listing is identified as "case closed" with a closure date of January 30, 2013.

As indicated from the above information, all of the Cortese List sites in the vicinity of the project site except one are closed, with contamination at the ongoing (open) listing (T0607301190) not extending within or adjacent to the project site. As a result, potential impacts related to listed hazardous material sites from implementation of the proposed project would be less than significant.

Electric and Magnetic Fields (EMF)

Electric and magnetic fields (EMF) are invisible lines of force that are present wherever electricity flows—around appliances and power lines, and in offices, schools, and homes. Electric fields are created by voltage and are shielded by most materials, including soil and concrete. Magnetic fields are created by current and, unlike electric fields, are not shielded by most materials. Both electric and magnetic field strengths diminish with increasing distance. EMF are low-energy, extremely low-frequency fields not to be confused with high-energy or ionizing radiation such as x-rays (SDG&E 2015).

Although not a Cortese List issue, EMF is being addressed in this document due to the adjacency of the existing SDG&E Felicita Substation to the project site (refer to Figure 3). Not specific to this project or to the subject substation but in general, concerns have been raised about a possible link between exposure to EMF and the occurrence of adverse health conditions in the public. Some EMF studies have reported a possible weak association between estimates of exposure to magnetic fields and certain types of cancer, for example. Other studies, however, have reported no effects (SDG&E 2015).

Over the past 30 years, hundreds of epidemiology and laboratory studies on the subject of potential health risks associated with EMF have been conducted worldwide. To assess potential health risks from power-frequency EMF, numerous internationally recognized scientific organizations and independent regulatory advisory groups have conducted scientific reviews of the EMF research literature. Reviews have been conducted by organizations and groups including the World Health Organization (WHO), National Radiological Protection Board, Health

Council of the Netherlands, and California Department of Health Services, and have brought together panels of experts from a variety of disciplines to review the full body of research on this issue (SDG&E 2015).

Without exception, these major reviews have reported that the body of data does not demonstrate that exposure to power-frequency magnetic fields causes cancer or other health risks, although the possibility of such risks cannot completely be dismissed. The weakness of the reported associations, the lack of consistency, and the severe limitations in exposure assessment in the epidemiology studies--together with the lack of support from laboratory studies—were key considerations in the findings of the described scientific reviews (SDG&E 2015). As such, most reviews recommend further research, which is ongoing worldwide.

Finally, there are no California or Federal standards in place regulating environmental levels of magnetic field exposure for workers or the general public. The panels of experts charged with recommending exposure limits for electric and/or magnetic fields have concluded that no meaningful experimental data exist on which to base standards or limits to which the public is exposed (SDG&E 2015). Based on the foregoing, potential effects associated with EMF from the adjacent Felicita Substation is considered less than significant.

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, the project would result in safety hazard for people residing or working in the project area;

f. For a project within the vicinity of a private airstrip, the project would result in a safety hazard for people residing or working in the project area;

The project site is not located within an airport land-use plan or within two miles of a public/public use airport or private airstrip, with the closest such facilities including: (1) Lake Wohlford Resort Airport, approximately 7 miles to the northeast; (2) Ramona Airport, approximately 10 miles to the southeast; (3) Blackington Airport, approximately 11 miles to the north; (4) McClellan/Palomar Airport, approximately 11.5 miles to the west; and (5) Pauma Valley Airpark, approximately 15.6 miles to the north. Based on the described distances, no impacts related to airport or airstrip safety hazards would result from project implementation.

g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or

Pertinent information regarding emergency response in the project site vicinity is provided in the County of San Diego General Plan (2011) and related documents, and in the City General Plan Community Protection Element (2012a). The County General Plan includes information on emergency evacuation in the Mobility and Safety elements, with reference to the Office of Emergency Services *Unified San Diego County Emergency Services Organization Operational Area Emergency Plan* (County 2010). Specifically, Annex Q (Evacuation) of the plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County…," with Interstate (I-) 15 and State Route (SR-) 78 identified in the project site vicinity. The County plan also notes that "Local jurisdictions will work with…applicable agencies/departments to identify evacuation points and transportation routes."

The City General Plan Community Protection Element identifies information related to emergency response in association with vehicular and aircraft (helicopter) access for police, fire

and ambulance/Emergency Medical Technician (EMT) services, with no specific "emergency response or evacuation plans" included (City 2012a). In addition, the Community Protection Element includes a number of policies related to emergency response for the noted services, including provision of adequate staffing, equipment and response times, and also identifies a number of designated emergency evacuation routes "…to aid in the orderly and rapid movement of people away from a threat or actual occurrence of a hazard." Several of these designated routes are located in the vicinity of the proposed project, and may be utilized by project-related traffic, including I-15, Centre City Parkway, South Escondido Boulevard and West Felicita Avenue.

From the above information and the proposed project design, potential impacts to emergency response or evacuation plans would be less than significant, based on the following considerations: (1) as described below in Section XVI, operational project traffic would not result in any significant impacts top local roadways or intersections, with no associated effects to emergency response or evacuation plans; (2) project construction would not involve any off-site roadway (or other applicable) improvements that would result in associated roadway/lane closures or related impacts to emergency response or evacuation plans; (3) indirect effects to regional and local roadways (including I-15 and the designated emergency evacuation routes noted above) from project-related construction traffic would be minor, due to the low ADT levels (approximately 30 trips) and the temporary nature of project construction; and (4) primary access to all major roadways from local properties would be maintained during construction and operation activities.

h. Expose people or structures to significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The project site is located in a primarily urbanized area, with extensive residential (and related) development intermixed with minor agricultural uses, vacant and graded properties, and minor areas of native habitat (e.g., riparian vegetation along Kit Carson Creek approximately 1,200 feet to the north-northeast at its closest point). The project site and surrounding areas are within an area designated as a high risk zone for wildfire hazards in the City General Plan Community Protection Element (City 2012a). Associated potential wildfire impacts related to implementation of the proposed project would be less than significant, however, based on the described land use pattern in the site vicinity, as well as the fact that the project design incorporates a number of measures to address potential wildfire hazards, including fire-resistant landscaping, avoidance of excessive or overgrown vegetation, and provision of educational materials on wildfire prevention. In addition, the project would be constructed in conformance with current fire and building codes. Long-term operational fire hazards would be less than significant.

The construction phase of the project could potentially increase the risk of wildland fires on a short-term basis, if, for example, equipment-related fires were accidentally started at the site. The probability for such fires to occur is low, however, and construction equipment would be outfitted with spark arrestors and other fire protection features such as on-board fire extinguishers. As a result, potential impacts associated with short-term wildland fire hazards from project construction would be less than significant.

VIII. HYDROLOGY AND WATER QUALITY

A Drainage Study and a SWQMP have been prepared for the proposed project by Masson & Associates, Inc. (Masson 2015a and 2016, respectively). These studies are summarized below along with other applicable data, and the complete technical reports are included in Appendix E of this document.

Significance Criteria and Impact Analysis

The effects of a project on hydrology and water quality are considered to be significant if the proposed project would:

a. *Violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters (consider temperature, dissolved oxygen turbidity and other typical storm water pollutants);*

b. *Have potentially significant adverse impacts on ground water resources, including but not limited to, substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);*

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial/increased erosion or siltation on- or off-site;*

d. *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 which would result in flooding on- or off-site and/or significant adverse environmental impacts;*

e. *Cause significant alteration of receiving water quality during or following construction;*

f. *Cause an increase of impervious surfaces and associated runoff;*

g. *Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;*

h. *Cause potentially significant adverse impact on ground water quality;*

i. *Cause or contribute to an exceedance of applicable surface or ground water receiving water quality objectives or degradation of beneficial uses;*

j. *Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired;*

k. *Create or exacerbate already existing environmentally sensitive areas;*

l. Create potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters;

m. Impact aquatic, wetland or riparian habitat;

n. Otherwise substantially degrade water quality;

Significance Criteria and Impact Analysis

Water Quality (Threshold Items a., e., and g. through n.)

As outlined in the following analysis, potential project-related water quality impacts are associated with both short-term construction activities and long-term operation and maintenance. The discharge of short- and long-term pollutants from the project site could potentially result in significant water quality impacts to downstream receiving waters, including portions of Kit Carson Creek, the San Dieguito River and Lake Hodges that are designated as impaired on the Clean Water Act Section 303(d) List of Impaired Waters. Specifically, Kit Carson Creek is listed for Pentachlorophenol (PCP) and total dissolved solids (TDS); the San Dieguito River is listed for bacteria, nitrogen, phosphorus, TDS and toxicity; and Lake Hodges is listed for color, manganese, nitrogen, pH, phosphorus and turbidity (SWRCB 2015).

Because the proposed project does not include activities or facilities that could directly affect groundwater quality (e.g., septic systems or underground fuel tanks) associated potential project-related impacts are limited to the percolation of surface runoff and associated pollutants. As a result, the following assessment of potential water quality impacts is applicable to both surface and groundwater resources.

Short-term Construction Impacts

Potential water quality impacts related to on- and off-site project construction include erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), generation of debris from demolition activities, and disposal of extracted groundwater (if required), as outlined below.

Erosion and Sedimentation. The existing soils on the site include Bonsall sandy loam and Ramona sandy loam (see Attachment B of the SWQMP). These soils are not considered critical coarse sediments; therefore, none of these coarse sediments exist on site. Potential construction-related erosion/sedimentation impacts would be avoided or reduced below a level of significance through conformance with existing City Storm Water requirements and the related NPDES Construction General Permit. Specifically, this would entail implementing a SWPPP and related BMPs in conformance with applicable regulatory requirements.

Construction-related Hazardous Materials. Project construction would involve the use and/or storage of hazardous materials such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The accidental discharge of such materials during project construction could potentially result in significant impacts if these pollutants reach downstream receiving waters, particularly materials such as petroleum compounds that are potentially toxic to aquatic species in low concentrations. As previously noted, implementation of a SWPPP would be required under NPDES and related City guidelines, and would include detailed measures to avoid or mitigate potential impacts related to the use and potential discharge of construction-related hazardous materials.

The project would include a number of preliminary construction BMPs, including measures related to the proper use and storage of hazardous materials. While detailed BMPs would be determined as part of the City/NPDES SWPPP process based on project-specific parameters, they are likely to include standard measures and guidelines from the City Storm Water Program and other sources such as CASQA (2009). Typical measures for control of construction-related hazardous materials that may be required in the project SWPPP include the following: (1) minimizing on-site hazardous material storage, and restricting storage locations to areas at least 50 feet from storm drains and surface waters; (2) maintaining written inventories, labels and warning signs for stored hazardous materials; (3) using berms, ditches, and/or impervious liners (or other applicable methods) in material storage and vehicle/equipment maintenance and fueling areas to provide an appropriate containment volume and prevent discharge in the event of a spill; (4) properly maintaining construction equipment and vehicles; (5) using appropriate sediment control devices/methods downstream of paving activities, and properly containing and disposing of wastes and/or slurry from sources including concrete, dry wall and paint, by using properly designed and contained washout areas; (6) providing training for applicable employees in the proper use, handling and disposal of hazardous materials, as well as appropriate action to take in the event of a spill; (7) storing absorbent and clean-up materials in readily accessible on-site locations; (8) properly locating, maintaining and containing portable wastewater facilities; (9) regularly (at least weekly) monitoring and maintaining hazardous material use/storage facilities and operations to ensure proper working order; and (10) implementing solid waste management efforts such as proper containment and disposal of construction debris.

Based on the implementation of appropriate BMPs as part of (and in conformance with) the project NPDES/City SWPPP and related requirements, associated impacts from construction-related hazardous materials would be less than significant.

Demolition-related Debris Generation. The proposed project would involve the demolition of existing on-site facilities including a residential structure and pavement. These activities would generate variable amounts of construction debris, potentially including concrete, asphalt, glass, metal, drywall, paint, insulation, fabric and wood. Demolition activities could also potentially generate particulates, as well as pollutants related to hazardous materials including lead-based paint and asbestos insulation as the existing on-site structure was built in 1953. The introduction of demolition-related particulates or hazardous material pollutants into local drainages or storm drain systems could potentially result in significant downstream water quality impacts.

Project construction would be subject to a number of regulatory controls related to demolition, including NPDES/City SWPPP requirements. The project SWPPP would include measures to address potential effects associated with pollutant generation from demolition activities as appropriate, with detailed requirements to be determined as part of the SWPPP process. Typical measures for control of demolition-related hazardous materials that may be required in the project SWPPP include: (1) recycling appropriate (i.e., non-hazardous) construction debris for on- or off-site use whenever feasible; (2) using dust-control measures such as watering to reduce particulate generation for pertinent locations/activities (e.g., concrete removal); (3) using appropriate erosion prevention and sediment control measures downstream of all demolition activities; and (4) providing conformance with applicable requirements related to the removal, handling, transport and disposal of hazardous materials generated during demolition (if testing finds such materials to be present).

Based on implementation of appropriate BMPs as part of (and in conformance with) the project NPDES/City SWPPP, as well as conformance with applicable hazardous material regulations

(if required), potential water quality impacts from project-related generation of demolition debris would be less than significant.

Disposal of Extracted Groundwater. Disposal of groundwater extracted during construction activities into local drainages and/or storm drain facilities could potentially generate significant water quality impacts through erosion/sedimentation, or the possible occurrence of pollutants in local groundwater aquifers. While shallow groundwater is not anticipated to be encountered during project-related excavation and construction (Geocon 2014), if dewatering is required the applicant and/or contractor would be required to conform with applicable criteria in the associated NPDES Groundwater Permit (NPDES No. CAG919002, Order No. R9-2008-0002). While specific BMPs to address potential water quality concerns from disposal of extracted groundwater would be determined based on site-specific parameters, they would likely include the following types of standard measures from the noted groundwater permit: (1) using erosion and sediment controls similar to those described above in Section VI.b. for applicable areas/conditions (e.g., disposal of extracted groundwater on slopes or graded areas); (2) testing extracted groundwater for appropriate contaminants prior to discharge; and (3) treating extracted groundwater prior to discharge, if required, to provide conformance with applicable discharge criteria (e.g., through methods such as filtration, aeration, adsorption, disinfection, and/or conveyance to a municipal wastewater treatment plant).

Based on the required conformance with NPDES Groundwater Permit standards and the implementation of related BMPs, water quality impacts from project-related disposal of extracted groundwater (if required) would be less than significant.

Long-term Operation and Maintenance Impacts

The following anticipated pollutants of concern may occur from project operation: sediment; nutrients; heavy metals; trash and debris; oxygen demanding substances; oil and grease; bacteria and viruses; and pesticides. The discharge of these types of pollutants could potentially result in significant impacts to downstream receiving waters, including those with 303(d) impaired listings as previously described.

Pursuant to requirements under the NPDES Municipal Permit (No. R9-2013-0001, NPDES No. CAS019266, as amended) and related City standards (e.g., the City SUSMP), the proposed project would be required to implement appropriate measures to address potential long-term water quality concerns and ensure regulatory conformance. Specifically, this would include the designation of drainage management areas (DMAs) pursuant to the City SUSMP and implementation of appropriate site design, source control, and treatment control BMPs. The project SWQMP provides preliminary calculations of DMAs and proposed BMPs based on NPDES and City standards, with these measures outlined below.

Drainage Management Areas. The use of DMAs is intended to facilitate the design and sizing of applicable BMPs, with the project SWQMP identifying 5 DMAs within the project site (see DMA North and DMA South exhibits following SWQMP in Appendix E), and associated proposed BMPs as summarized below.

Site Design BMPs. Site design BMPs are intended to avoid and/or control post-development runoff, erosion potential and pollutants generation to the maximum extent practicable (MEP) by mimicking the natural hydrologic regime. The site design process employs design practices and techniques to effectively capture, filter, store, evaporate, detain and infiltrate runoff close to its source. Specific site design measures identified in the project SWQMP include: (1) minimizing

impervious area, with 19 percent of the project area being pervious; (2) minimizing soil compaction; (3) landscaping with native and/or drought-tolerant species; (4) runoff collection; and (5) bioretention basins (discussed further under treatment control BMPs).

Source Control BMPs. Source control BMPs are intended to avoid or minimize the introduction of pollutants into storm drains and natural drainages to the MEP by reducing on-site pollutant generation and off-site pollutant transport. Source control BMPs identified in the project SWQMP are identified under three main topics: waste handling and disposal; building and grounds maintenance; and drainage system maintenance. Specifically, for waste handling and disposal, measures include but are not limited to: general storage container measures such as leak-proof lids and sweeping and cleaning of the storage area; controlling litter through sufficient number of receptacles and cleaning out of receptacles; and preventing storm water runoff from entering the waste management area. For building and grounds maintenance, measures include but are not limited to: pressure washing of buildings and rooftops; use of mulch or other erosion control measures on exposed soils; and following all federal, state, and local laws and regulations governing the use, storage, and disposal of fertilizers and pesticides. For drainage system maintenance, measures include but are not limited to: cleaning and inspection of catch basins and inlet structures; storm drain flushing if deposit problems are identified; and prevention of illicit connections and discharges.

Treatment Control BMPs. Treatment control BMPs are designed to remove pollutants from urban runoff for a design storm event to the MEP through means such as filtering, treatment, or infiltration. Treatment control BMPs are typically required to address the identified pollutants of concern and provide medium or high levels of removal efficiency for these pollutants. Proposed treatment control BMPs include a number of bioretention facilities (i.e., one at Del Prado North, seven at Del Prado South; refer to Figures 4a and 4b, respectively), which would provide a medium or high rating for removal of all likely pollutants from storm water.

BMP Operation and Maintenance. The Identified BMPs include physical facilities such as no dumping markings and bioretention facilities that require ongoing monitoring and maintenance (pursuant to associated requirements in the City SUSMP). Accordingly, monitoring and maintenance efforts for all applicable BMPs would be implemented by the project applicant (e.g., via the homeowner's association). Specifically, this would entail entering into a written BMP Maintenance Agreement with the City, preparing/implementing a Maintenance Plan, monitoring and reporting to document that programs/activities are being implemented as designed, and providing adequate funding (e.g., through means such as a cash deposit, letter of credit, or other means acceptable to the City).

With implementation of the above-described (or other appropriate) design measures, the proposed project would conform with all applicable regulatory requirements related to long-term water quality concerns and associated impacts would be avoided or reduced below a level of significance.

Groundwater Resources (Threshold Item b.)

The proposed project would not result in increased use or extraction of local groundwater, with no associated impacts to groundwater supplies, aquifer volumes, or groundwater tables. In the unlikely event that shallow groundwater is encountered during project construction, temporary dewatering efforts would be implemented in conformance with applicable NPDES requirements as noted above. Based on the minor and temporary nature of such potential dewatering

activities, no associated significant impacts from the drawdown or depletion of local groundwater resources would be anticipated.

The site is underlain by sandy loam soils, which have a slow to very slow infiltration rate and are not well suited for groundwater infiltration. While project implementation would include the installation of impervious surfaces such as structures and pavement, associated potential impacts to existing on-site recharge capacity would be less than significant based on the following considerations: (1) the site design includes extensive landscaping that would provide recharge capacity (with flows from rooftops and paved areas directed to landscaping as outlined above under the discussion of Water Quality); and (2) proposed LID/Treatment Control BMPs include several bioretention facilities, which would hold (retain) storm flows and provide opportunities for infiltration and associated groundwater recharge.

Drainage and Runoff (Threshold Items c., d., f. and g.)

Drainage Alteration

Surface flows within and from the project site are generally to the east and south, entering existing City storm water facilities in Centre City Parkway before ultimately discharging to the San Dieguito River and Lake Hodges approximately two miles to the south. While project implementation would result in some modification of the existing on-site drainage patterns and directions through proposed grading and construction, the overall existing on- and off-site drainage patterns would not be substantially altered. That is, flows from the site would continue to enter existing drainage facilities in Centre City Parkway, and ultimately flow south to the San Dieguito River and Lake Hodges. As a result, overall runoff patterns and directions would be maintained and project-related impacts to drainage alteration would be less than significant, including associated potential erosion and siltation effects (with additional information on potential erosion concerns provided above under the discussion of *Water Quality*).

The project SWQMP also includes an assessment of hydromodification[1] compliance (Masson 2016). The SWQMP analyzed whether the project site could achieve full infiltration of runoff; it was determined this would not be possible due to the poor infiltration characteristics of the sandy loam soils that underlay the site. However, based on associated storm water management modeling, the SWQMP hydromodification analysis concludes that the proposed project would comply with all applicable requirements through the use of bioretention facilities, as discussed above under *Water Quality*. These facilities would provide flow regulation (in addition to water quality treatment) and conformance with hydromodification requirements related to applicable design storm flows (Masson 2016). As a result, potential impacts related to hydromodification from implementation of the proposed project (including associated potential erosion and siltation effects in downstream waters) would be less than significant.

Runoff Rates and Amounts

As previously noted, project implementation would include the installation of impervious surfaces such as structures and pavement, with an associated increase in runoff generation. Specifically, calculated 50-year storm flows generated within the site would increase from the current level of approximately 7.0 cubic feet per second (cfs), to 12.1 cfs after proposed development (Masson 2015a). The proposed project design, however, includes the use of

[1] Hydromodification is defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (infiltration and overland flow) caused by urbanization or other land use changes that result in increased stream flows, sediment transport, and morphological changes in the channels receiving the runoff.

several bioretention basins as previously described. These basins would provide flow regulation as well as water quality treatment, with post-development 50-year storm flows from the site to be equal or less than current flows (Masson 2015b). As a result, potential impacts related to runoff rates and amounts, including associated storm drain capacity and flooding effects, would be less than significant. Additionally, as noted above under the discussion of Drainage Alteration, the SWQMP hydromodification analysis concludes that the proposed project would comply with all applicable requirements. As a result, potential project-related hydromodification impacts, including associated potential flooding and related effects in downstream waters, would be less than significant.

o. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

p. Place project within a 100-year flood hazard area structures which would impede or redirect flood flows;

q. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or,

r. Inundate the site by seiche, tsunami, or mudflow.

Flooding/Inundation (Threshold Items o. through r.)

Floodplains

The project site and adjacent areas are mapped as Zone "X" by the Federal Emergency Management Agency (FEMA), with this designation defined as areas determined to be outside of the 500-year (and therefore the 100-year) floodplain (FEMA 2012a and 2012b). The closest mapped 100-year floodplain is located approximately 1,200 feet north-northeast of the site in association with Kit Carson Creek. Based on the described conditions, no impacts related to the placement of housing or other facilities within 100-year floodplains that could impede or redirect flood waters are anticipated from the proposed project.

Dam Inundation

The project site is not located within or adjacent to any mapped dam inundation areas, with the closest such designation located approximately 1,000 feet to the north in association with Lake Dixon (City 2012a). Based on the described conditions, no impacts related to dam inundation would result from project implementation.

Inundation by Seiche, Tsunami or Mudflow

Tsunamis (commonly referred to as tidal waves) are sea waves generated by sources such as underwater earthquakes or volcanic eruptions, and can generate impacts related to inundation in coastal zones. Because the project site is located approximately 14 miles inland and between approximately 600 and 625 feet AMSL, no impacts related to inundation by tsunami are anticipated from project implementation.

Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed bodies of water such as lakes or reservoirs, and are most typically associated with seismic activity. Seiches can result in flooding damage and related effects (e.g., erosion) in surrounding areas

from spilling or sloshing water, as well as increasing pressure on containment structures. The closest large water bodies to the project site include Lake Hodges (approximately 2.5 miles to the southwest), Olivenhain Reservoir (3.3 miles to the southwest), Dixon Lake (approximately 4.6 miles to the north-northeast), and Lake Wohlford (approximately 6.3 miles to the northeast). Based on the noted intervening distances to the project site, no seiche-related impacts would result from project implementation.

Proposed project facilities are generally not considered susceptible to inundation by mudflow, due to the relatively level nature of the site and vicinity (with the closest area of substantial topography located approximately two miles to the west). Accordingly, no mudflow-related impacts are anticipated in association with project implementation.

IX. LAND USE AND PLANNING

Significance Criteria and Impact Analysis

The effects of a project on existing or planned land uses are considered significant if the proposed project would:

a. *Physically divide an established community;*

The project proposes the development of 113 new town homes within an established community consisting of residential and commercial uses. The project would not prohibit access to, or otherwise physically divide, an established community. No associated impacts would occur.

b. *Conflict with any applicable land-use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;*

As previously noted, the project site and applicable off-site areas along S. Centre City Parkway and Centre City Parkway are currently zoned C-G, with a corresponding General Plan land use designation of GC (with a minimum residential density of 30 dwelling units per acre). The City's GC designation is characterized by a broad range of service and retail uses in local commercial, community shopping/office complexes, and regional shopping centers (City 2012a). Adjacent areas within the City are zoned Single-family and Multi-family Residential, Planned Development Commercial, and C-G, with associated land use designations of Suburban Residential and GC. The project site also is within Area "B" of the South Escondido Boulevard Neighborhood Plan, which corresponds to an approximately 2.5-mile stretch of the South Escondido Boulevard commercial corridor in the vicinity of the site. The South Escondido Boulevard Neighborhood Plan was adopted in 1996 to assist in improving and revitalizing the neighborhood. The Plan includes goals and recommendations regarding existing and future land uses, development standards and regulations, and design guidelines for the entire corridor; and restricts uses on the project site to commercial or mixed-use (i.e., commercial with a residential component).

The project site is located in the Centre City Parkway/Brotherton Road Target Area, which is described in the General Plan. The guiding principles for this target area include increased density that is in close proximity to transit and services. The project is consistent with this target area as it would provide increased density in the area that is near bike lanes

(on Centre City Parkway) and within 0.5 mile of the nearest bus stop (Metropolitan Transit System [MTS] Bus Route 350).

There is no commercial component to the proposed project; rather, the project proposes 113 residential units on two lots with approximately 23 and 24 units per acre, respectively. To accomplish this, an amendment to the South Escondido Boulevard Neighborhood Plan is proposed to allow an exclusively residential project within a C-G zone, and a zoning change is proposed from C-G to PD-R, with a lower minimum density. The project site is not located within the coastal zone, and is not subject to general plan, specific plan or other known land use policies/regulations intended to avoid or mitigate environmental effects. Accordingly, with implementation of the proposed zoning change and amendment to the South Escondido Boulevard Neighborhood Plan, the proposed project would result in less-than-significant impacts related to conflicts with applicable zoning, general plan or other land use regulations.

c. *Conflict with any applicable habitat conservation plan or natural community conservation plan;*

As discussed above in Section III, *Biological Resources*, the project site would not conflict with any applicable habitat conservation plan or natural community conservation plan. No associated impacts would occur.

d. *Have a substantial adverse effect on a scenic vista;*

e. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;*

The heavily disturbed project site is located along a developed corridor with both neighborhood and commercial uses on all sides. No scenic vistas or view corridors toward the project site or adjacent properties would be affected. The project would not damage scenic resources as there are no designated on-site scenic resources due to the disturbed nature of the site and developed nature of the surrounding area. The project would not disturb ridges, hilltops, natural rock outcroppings, or interfere with any open space areas in a natural state. There are no historic buildings or state scenic highways in the vicinity of the site, and the project site is not located within the I-15 scenic corridor as defined in the City General Plan Resource Conservation Element (City 2012a). No impacts to scenic vistas or scenic resources would occur.

f. *Substantially degrade the existing visual character or quality of the site and its surroundings;*

The largely vacant project site is located in a developed area, which predominantly consists of single- and multi-family residential and commercial uses. The introduction of additional homes in this area, specifically along the urbanized Centre City Parkway/South Escondido Boulevard corridor, would be compatible with surrounding multi-story residential and commercial development in the vicinity in terms of bulk and scale. In addition, the developed project site would represent an aesthetic improvement over the existing condition of the site, which is heavily disturbed (refer to Figures 5a and 5b). Proposed development standards for the site would be consistent with the City's design standards for the area. Based on the foregoing, the project would be visually compatible with, and would not result in degradation of, the existing visual character or quality of the site and its surroundings. Temporary construction-related effects on the visual character and quality of the site would not result in significant impacts as

they would be short-term and temporary in nature. Associated impacts would be less than significant.

g. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Existing outdoor lighting sources in the project site vicinity vary in intensity; those to the west are primarily associated with residential uses, which generally are minor and of low wattage, while those to the north, east, and south are associated with commercial uses which tend to be of higher wattage and frequency. Project construction would be limited to daylight hours and thus would not require lighting. As such, construction-related impacts from light and glare would not occur. While permanent exterior lighting associated with the proposed townhomes and parking areas would be installed for wayfinding and security purposes, these lights would be required to comply with Section 33-711, Article 35 (Outdoor Lighting) of the Escondido Municipal Code. The proposed townhome units would not include large expanses of glass or windows, and no significant sources of glare are proposed. Based on the described conditions, any associated potential light and glare impacts would be less than significant.

X. MINERAL RESOURCES

Significance Criteria and Impact Analysis

The effects of a project on mineral resources are considered to be significant if the proposed project would:

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; or

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.

According to Figure 4-11-1 of the General Plan EIR, no existing or past mineral extraction facilities are located on the project site (City 2012b). Historically, the site has not been associated with mineral mining or excavation. Therefore, no impacts to the loss of a known mineral resource or locally-important mineral resource recovery site would occur.

XI. NOISE

Significance Criteria and Impact Analysis

The effects of a project on noise are considered to be significant if the proposed project would result in:

a. Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

An Acoustical Analysis Report was prepared for the proposed project by HELIX (HELIX 2016); this document is summarized in the following analysis and included as Appendix F of this MND.

Construction Noise

Construction-noise impacts from the project include noise generated from equipment involved with grading and with demolition of the existing single-family home and concrete pads on the site; these construction activities are typically significantly louder than other activities. Construction activities would comply with Section 17-234 and 17-238 of the Escondido Municipal Code, which prohibits construction on Sundays and holidays and allows construction between 7:00 AM and 6:00 PM on weekdays and between 8:00 AM and 5:00 PM on Saturdays. The code also prohibits construction noise levels in excess of a 75 decibels (dB) one-hour average sound level (L_{EQ} [1 hour]).

Equipment used during demolition would include a front end loader and a dump truck and during grading would include a dozer and an excavator. The highest impact level from the operation of a front end loader and a dump truck to the nearest residence would be 74.2 dB L_{EQ} (1 hour). A dozer or an excavator would not be expected to be operating simultaneously; the highest impact level from this equipment would be 71.7 dB L_{EQ} (1 hour) for a dozer and 70.7 dB L_{EQ} (1 hour) for an excavator. Therefore, construction noise levels would not exceed Municipal Code limits, and impacts would be less than significant.

Transportation Noise

As stated in the City's General Plan Community Protection Element, the noise level goal for multi-family residential uses is 65 A-weighted decibels (dBA) community noise equivalent level (CNEL) at the exterior use areas. In addition, Title 24 of the California Code of Regulations establishes an interior noise standard of 45 dBA CNEL. The Acoustical Analysis Report used the highest traffic volumes from the Traffic Impact Study ([TIS] KOA 2015) under the Near-term Future Plus Project scenario to conservatively estimate on-site exterior noise levels from traffic. As determined by the report, no exterior use areas would exceed the City standard of 65 dBA CNEL and impacts to exterior use areas associated with traffic noise would be less than significant.

Traditional architectural materials are normally able to reduce exterior to interior noise by up to 15 dBA. Because building façade noise levels may exceed 60 CNEL at the proposed residences facing Brotherton Road or S. Centre City Parkway (i.e., at both Del Prado North and Del Prado South; refer to Figures 4a and 4b), traditional architectural materials would not be expected to attenuate interior noise to a level of 45 CNEL. Therefore, interior noise levels are likely to exceed the Title 24 interior noise standard of 45 CNEL, resulting in a potentially significant impact. These impacts would be reduced below a level of significance through implementation of the following mitigation measure.

NOI-1 **Interior Noise Attenuation.** Interior noise levels for the proposed residences shall not exceed 45 CNEL. Once specific building plan information is available, additional exterior-to-interior noise analysis shall be conducted for the proposed residences that face Brotherton Road or S. Centre City Parkway where exterior noise levels are expected to exceed 60 CNEL to demonstrate that interior levels do not exceed 45 CNEL. The information in the analysis shall include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. The analysis shall also assume a "windows-closed" condition and that vehicles on Centre City Parkway are traveling at 50 mph. With this specific building plan information, the analysis shall determine the predicted interior noise levels at the planned on-site buildings. If

predicted noise levels are found to be in excess of 45 CNEL, the report shall identify architectural materials or techniques that could be included to reduce noise levels to 45 CNEL in habitable rooms. Standard measures such as glazing with Sound Transmission Class (STC) ratings from a STC 22 to STC 60, as well as walls with appropriate STC ratings (34 to 60), should be considered.

Appropriate means of air circulation and provision of fresh air would be provided to allow windows to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2001 California Building Code).

Operational Noise Sources

The anticipated primary project operational noise sources include vehicular traffic, heating, ventilation and air conditioning (HVAC) systems, and nuisance noise. Potential impacts from these sources are discussed below.

Off-site Transportation Noise. A significant direct impact would occur from project-generated traffic if buildings where people normally sleep and institutional land uses with primarily daytime and evening uses are exposed to noise level increases in excess of the incremental noise standards in Figure VI-14 of the General Plan Community Protection Element (City 2012a). Although the project would increase noise along surrounding roadways, no increases would exceed incremental noise standards under either the Existing Plus Project traffic scenario or the Near-term Future scenario. Therefore, impacts from off-site transportation noise would be less than significant.

Heating, Ventilation, and Air Conditioning Systems. Stationary operational noise sources are regulated by the limits within City Municipal Code Section 17-229, which states that noise from multi-family residential uses shall not exceed 55 dBA L_{EQ} from 7:00 AM to 10:00 PM and 50 dBA L_{EQ} from 10:00 PM to 7:00 AM. A typical HVAC system would generate a noise level of 56 dBA L_{EQ} at a distance of 7 feet. The closest residential property line to a ground-mounted project HVAC unit would be the residence adjacent to the northwestern property line of the north lot, located approximately 30 feet from the nearest proposed HVAC unit. At this distance, the unit was modeled to generate a noise level of 43 dBA L_{EQ} at the residential property line. Therefore, HVAC unit noise would not exceed 50 dBA L_{EQ}, and impacts would be less than significant.

Landscape Equipment and Nuisance Noise. General residential noise sources such as landscape equipment and other intermittent or neighborhood noise such as amplified music or barking dogs (often characterized as nuisance noise) are regulated by the limits within Escondido Municipal Code Sections 17-237 and 17-240 of the noise ordinance. Nuisance noise is difficult to control due to the variety of noise sources and intermittent nature of the impact. Compliance with the noise ordinance would limit exposure to nuisance noise and impacts would be less than significant.

b. Exposure of persons to, or generation of, excessive ground-borne vibration or ground-borne noise levels;

The technical evaluation in Appendix F includes an assessment of ground-borne noise and vibration associated with project construction. Based upon City General Plan Community

Protection Element standards, a significant impact would occur if project construction activities would expose vibration-sensitive uses to vibration levels that exceed 65 vibrations decibels (VdB), residences and buildings where people normally sleep to 80 VdB, or institutional land uses with primarily daytime uses to 83 VdB.

This analysis identifies the use of a vibratory roller as the most likely sources of ground-borne noise and vibration impacts, and provides the following conclusions:

- A vibratory roller would generate approximately 80 VdB at 75 feet and 83 VdB at 60 feet. Therefore, if a vibratory roller would be operated within 75 feet of nearby residences or within 60 feet of the adjacent KinderCare childcare center, impacts would be potentially significant. These impacts would be reduced below a level of significance through implementation of the following mitigation measure:

- It should be noted that provided that a vibratory roller is operated at a distance further than 25 feet, peak particle velocity (PPV) would not exceed 0.2 inches per second, and building damage would not be expected to occur.

NOI-2 **Vibration Attenuation.** The construction contractor shall not operate a vibratory roller, or equipment with the potential to result in an equivalent level of vibration, that results in a level that exceeds 80 VdB at off-site residences or 83 VdB at the off-site KinderCare childcare center. Operation of a vibratory roller or equivalent shall be avoided within 75 feet of any off-site residence or 60 feet of the off-site childcare center.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;

Refer to Operational Noise Sources under XI(a.). The project would not create a substantial permanent increase in ambient noise levels in the project vicinity and associated impacts would be less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;

Refer to Construction Noise under XI(a.). The project would comply with applicable noise regulations to minimize temporary or periodic increases in ambient noise levels due to construction. There would be no substantial periodic increase in ambient noise from project operation. Therefore, impacts would be less than significant.

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, significant impact would occur if the project exposed people residing or working in the project area to excessive noise levels; or

f. For a project within the vicinity of a private airstrip, if the project exposed people residing or working in the project area to excessive noise levels.

As noted in the Escondido General Plan Update EIR, the two nearest public airports to the City are the McClellan-Palomar Airport and Ramona Airport. Additionally, portions of the City are subject to periodic flyovers from Marine Corps Air Station (MCAS) Miramar. However, the entire

City is outside of the 60 CNEL noise contours for these airports. The project site is not within two miles of any private airstrip. Therefore, impacts associated with airports and airstrips would not occur.

XII. POPULATION AND HOUSING

Significance Criteria and Impact Analysis

The effects of a project on population and housing are considered to be significant if the proposed project would:

a. *Induce substantial 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);*

The proposed project would directly add to the City's population by providing additional housing. The proposed project would increase the number of dwelling units within the City by 112 (as it would add 113 units while displacing one unit). According to SANDAG's 2014 population and housing estimates, the average household size in Escondido is 3.12 people. Applying this rate, an additional 112 units could result in a population increase of approximately 349 people.

Construction of 113 dwelling units (112 net new) would not result in substantial indirect growth inducement, however, because: (1) no obstacles to population growth would be removed, such as provision of an essential public service or access to a previously inaccessible area, (2) the project would not induce further growth through the expansion or extension of existing services, utilities, or infrastructure, and (3) this development would support General Plan Housing Policy 1.1 to "expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City." In addition, the project site is within a developed urbanized area largely surrounded by existing residential development, and served by existing proximate infrastructure. Therefore, growth-inducing impacts resulting from project implementation would be less than significant.

b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or*

c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.*

Implementation of the proposed project would displace one existing single-family home. The loss of this residence would not be considered a substantial displacement of housing or a substantial displacement of people, nor would it necessitate the construction of replacement housing. Furthermore, the loss of this unit would allow for construction of 113 new (112 net new) townhome dwelling units. Therefore, impacts associated with displacement of substantial numbers of existing housing or people would not occur.

XIII. PUBLIC SERVICES

Significance Criteria and Impact Analysis

The effects of a project on public services are considered to be significant if the proposed project would:

a. *Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

    1. *Fire Protection*
    2. *Police Protection*

Although implementation of the proposed project could result in an estimated increase of 349 persons in the area, this increase is expected to generate an incrementally increased demand for fire and police protection services. It is likely that some future residents of the proposed project are existing Escondido residents, perhaps already residing within the same community as the project site. The proposed project is not expected to result in levels of demand for fire or police protection such that they would drive the need for new or altered fire or police protection facilities or related infrastructure that could result in significant adverse physical impacts.

    3. *Schools*
    4. *Parks*
    5. *Other Public Facilities*

Implementation of the proposed project could result in an estimated increase of 349 persons in the area, which is anticipated to increase demand on local school facilities only incrementally. As described above, not all future residents of the proposed would necessarily represent new residents, as they may already reside within the City or even within the community where the project site is located. Furthermore, not all residents of the project would be school-age children or would have school-age children. Nevertheless, the project developer would pay statutory school fees pursuant to Education Code Section 17620 and Government Code Section 65995. Therefore, with payment of required fees, the proposed project is not anticipated to require construction of additional schools that could result in physical impacts, and associated impacts would be less than significant. The project would incrementally increase the demand for park space and could increase usage at existing City parks. The project, however, does include some recreational facilities and would not require the construction of new or expansion of existing park facilities. Therefore, there would not be an associated significant impact to parks. The construction of 113 single-family homes would result in a relatively small increase in population (e.g., an estimated 349 people) creating minimal additional demand on other public facilities (i.e., libraries, childcare centers) within the City; however, this minor additional demand is not expected to require the construction of new or expanded public facilities and associated impacts would be less than significant.

XIV. RECREATION

Significance Criteria and Impact Analysis

The effects of a project on recreation are considered to be significant if the proposed project would:

a. *Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;*

b. *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

The project proposes the development of 113 townhomes that could cause an incremental increase in the use of existing neighborhood and regional parks and recreation facilities. Any associated increase in the use of these facilities, however, would be minor and is not expected to lead to or accelerate substantial physical deterioration of such facilities. Furthermore, any potential impacts would be offset by the project's payment of Park and Facilities Impact Fees, which are paid upon issuance of building permits; associated impacts would be less than significant.

The project does propose the development of recreational facilities for use by residents, including a pool, but it would not require the construction or expansion of other recreational facilities. The proposed internal recreational facilities are not expected to have an adverse physical effect on the environment, and associated impacts would be less than significant.

XV. TRANSPORTATION/TRAFFIC

A Traffic Impact Study (TIS) has been prepared for the proposed project by KOA Corporation (KOA 2015). The study is summarized below, and the complete TIS is included in Appendix G of this document.

Significance Criteria and Impact Analysis

The effects of a project on transportation/traffic are considered to be significant if the proposed project would:

a. *Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?*

Roadway segment and intersection operating conditions are typically described in terms of LOS. LOS is a scale used to indicate the quality of traffic flow on roadway segments and at intersections, with a range from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion). Based upon SANTEC/ITE guidelines and the City of Escondido Traffic Analysis Guideline, if roadway segments or intersections are operating at LOS D or better, impacts are not considered significant (refer to Appendix A of the TIS for more information).

The scope of the study area analyzed in the TIS is based on the City's Traffic Impact Analysis Guideline, discussions with City staff, and a working knowledge of the local transportation system. The study area included the following eight roadway segments and five intersections:

Roadway Segments

- S. Centre City Parkway from Brotherton Road to Citracado Parkway
- Centre City Parkway north of Brotherton Road
- Centre City Parkway from Brotherton Road to Citracado Parkway
- Centre City Parkway south of Citracado Parkway
- Brotherton Road from Charise Street to S. Centre City Parkway
- Brotherton Road from S. Centre City Parkway to Centre City Parkway
- Citracado Parkway west of S. Centre City Parkway
- Citracado Parkway from S. Centre City Parkway to Centre City Parkway

Intersections

- Charise Street/Project Driveway #1 at Brotherton Road
- S. Centre City Parkway at Brotherton Road
- Centre City Parkway at Brotherton Road
- S. Centre City Parkway at Citracado Parkway
- Centre City Parkway at Citracado Parkway

According to the TIS, the proposed addition of 113 multi-family units is expected to generate 904 ADT with a total of 72 AM peak-hour trips (14 in, 58 out), and 90 PM peak-hour trips (63 in, 27 out).

Roadway segment capacities and corresponding LOS are listed in Table 5, *Roadway Segment Conditions*. As shown in the table, the additional trips associated with the project would not cause the LOS of any roadway segment to decrease in the Existing Plus Project scenario; therefore, the project would not cause direct impacts to roadway segments.

To analyze cumulative impacts, four cumulative projects in the study area circulation network were identified, including three residential projects and one commercial project (refer to Table 4-1 of the TIS for more information). The trips from these cumulative projects in the vicinity of the project site were added to the project intersections and roadway segments. As can be seen in Table 5, the combined trips of the project and cumulative projects would not cause the LOS of any segment to decrease to an unacceptable level in the Near-term Future Plus Project scenario. Therefore, all roadway segments would continue to operate at acceptable levels with the proposed project in place. Associated roadway segment impacts would be less than significant.

Table 5
ROADWAY SEGMENT CONDITIONS

Roadway Segment	Existing		Existing Plus Project		Near-term Future		Near-term Future Plus Project	
	V/C[1]	LOS[2]	V/C	LOS	V/C	LOS	V/C	LOS
S. Centre City Parkway								
Brotherton Road to Citracado Parkway	0.021	A	0.064	A	0.064	A	0.107	A
Centre City Parkway								
North of Brotherton Road	0.634	C	0.641	C	0.655	C	0.663	C
Brotherton Road to Citracado Parkway	0.656	C	0.668	C	0.684	C	0.696	C
South of Citracado Parkway	0.659	C	0.670	C	0.682	C	0.693	C
Brotherton Road								
Charise Street to S. Centre City Parkway	0.076	A	0.138	A	0.222	A	0.284	A
S. Centre City Parkway to Centre City Parkway	0.084	A	0.127	A	0.187	A	0.230	A
Citracado Parkway/Gamble Lane								
S. Centre City Parkway to Centre City Parkway	0.476	B	0.501	B	0.545	C	0.570	C

[1] V/C = Vehicle to Capacity ratio
[2] LOS = Level of Service
Source: KOA Corporation 2015

Intersection delays and corresponding LOS are listed in Table 6, *Intersection Conditions*. As shown in the table, the additional traffic generated by the project would not cause the LOS of any intersection to decrease in the Existing Plus Project scenario. In addition, the combined traffic of the project and cumulative projects would not cause the LOS of any intersection to decrease to an unacceptable level in the Near-term Future Plus Project scenario. Therefore, all study area intersections would continue to operate at acceptable levels during the AM and PM peak hour periods with the proposed project in place. Associated intersection impacts would be less than significant.

Table 6
INTERSECTION CONDITIONS

Intersection	Existing		Existing Plus Project		Near-term Future		Near-term Future Plus Project	
	Delay[1]	LOS[2]	Delay	LOS	Delay	LOS	Delay	LOS
AM Peak Hour								
Brotherton Rd & Charise St / Project Driveway # 1[3]	8.8	A	9.1	A	8.9	A	9.3	A
Brotherton Rd & S. Centre City Pkwy[3]	9.2	A	9.5	A	10.1	B	10.4	B
Brotherton Rd & Centre City Pkwy[3]	13.8	B	14.3	B	14.7	B	15.2	C
W. Citracado Pkwy & S. Centre City Pkwy[3]	10.9	B	11.4	B	12.1	B	12.7	B
W. Citracado Pkwy & Centre City Pkwy[4]	10.1	B	13.7	B	11.3	B	15.0	B
S. Centre City Pkwy & Project Driveway #2[3]	-	-	8.5	A	-	-	8.5	A
PM Peak Hour								
Brotherton Rd & Charise St / Project Driveway # 1[3]	8.8	A	9.2	A	8.9	A	9.4	A
Brotherton Rd & S. Centre City Pkwy[3]	8.9	A	9.5	A	9.8	A	10.5	A
Brotherton Rd & Centre City Pkwy[3]	16.7	C	16.8	C	17.2	C	17.2	C
W. Citracado Pkwy & S. Centre City Pkwy[3]	11.6	B	12.1	B	13.0	B	13.8	B
W. Citracado Pkwy & Centre City Pkwy[4]	9.8	A	14.2	B	10.2	B	14.7	B
S. Centre City Pkwy & Project Driveway #2[3]	-	-	8.4	A	-	-	8.4	A

[1] Delay = Second per vehicle
[2] LOS = Level of Service
[3] Unsignalized intersection
[4] Signalized intersection
Source: KOA Corporation 2015

The TIS determined that no road network changes would be required for the project, the proposed parking meets City requirements, and the proposed on-site circulation would be adequate based on the types of vehicles anticipated to frequently enter and exit the site.

Pedestrian access would be provided via sidewalks on Brotherton Road and S. Centre City Parkway along the project frontage. No sidewalks currently exist along the project frontage (refer to Figures 5a and 5b); therefore, the project would improve pedestrian circulation in the area. No bike lanes exist or are proposed on these streets; however, dedicated bike lanes are present on the nearby Centre City Parkway. Regarding mass transit, while there is currently no transit service directly to the project site, MTS Bus Route 350 stops at the intersection of Escondido Boulevard and Sunset Drive, approximately 0.5 mile from the project site. The

project does not propose changes to existing bus stops. Therefore, no impacts related to these issues would occur.

Based on the above considerations, the project would not conflict with applicable plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Refer to response to Issue XV.a. SANDAG prepared the Congestion Management Program (CMP) for the San Diego region, which includes the City (SANDAG 2008). The CMP requires a traffic analysis for all large-scale projects that generate at least 2,400 daily trips or 200 or more peak-hour trips. The project does not meet the daily or peak-hour trip generation threshold as it would generate 904 ADT and 162 peak hour trips; therefore, no detailed CMP arterial analysis is required and no associated impacts would occur.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;

The closest public airport is Ramona Airport, located approximately ten miles southeast of the project site. The closest private airport is Lake Wohlford Resort Airport, which is located approximately seven miles northeast of the site. The project site is not within the airport influence area for either the Ramona or Lake Wohlford airport. In addition, the proposed project would not include aviation components or structures where height would be an aviation concern and, therefore, would not affect air traffic patterns. No associated impacts would occur.

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

The project would provide striping modifications to Brotherton Road and S. Centre City Parkway, including the addition of a stop sign to eastbound Brotherton Road before S. Centre City Parkway and a two-way turning lane on Brotherton Road. These changes would likely increase safety on the roadways by providing an additional stop and a committed area to turn. Therefore, the project would not include the construction of hazards (e.g., sharp curves or dangerous intersections), and would not result in incompatible uses with the surrounding developed area. Therefore, no associated impacts would occur.

e. Result in inadequate emergency access;

Impacts to emergency vehicle access along S. Centre City Parkway and/or Brotherton Road in the project site vicinity during construction are not expected to occur. Construction activity is expected to remain within the limits of the project site, lane closures on adjacent roadways are not anticipated, and access to public roadways by emergency vehicles would be maintained at all times. Accordingly, impacts associated with emergency access would be less than significant.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Refer to response to Issue XV.a.-b. regarding public transit, bicycle, or pedestrian facilities. Implementation of the project would not conflict or interfere with policies contained in the Mobility and Infrastructure Element of the City's General Plan regarding alternative transportation modes. No associated impacts would occur.

XVII. UTILITIES AND SERVICE SYSTEMS

Significance Criteria and Impact Analysis

The effects of the project on utilities and service systems are considered to be significant if the proposed project would:

a. *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;*

b. *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*

The proposed project would generate a small increase in wastewater due to the addition of an estimated 349 residents to the generally vacant project site. However, treatment of wastewater generated by the project is anticipated to be routine and is not expected to exceed wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB).

The proposed project would require the use of water and wastewater treatment facilities; however, the relatively small residential project is not of a scale that would substantially increase the demand for wastewater treatment services and would not require the need for new or expanded water or wastewater treatment facilities. Adequate municipal services are available to serve the project. Impacts associated with water or wastewater treatment would be less than significant.

c. *Require, or result in, the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*

Refer to responses to Issues VIII. c., d., f., and g. The proposed project would create an increase in runoff due to the addition of impervious surfaces compared to existing conditions. However, the addition of eight bioretention basins across the site would help reduce the amount of flow exiting the site (Masson 2015a). Proposed on-site and existing off-site drainage facilities are expected to be sufficient to convey post-development flows. No expansion of existing facilities would be required, and the construction of project-specific drainage facilities would not result in significant environmental effects. Associated storm water drainage impacts would be less than significant.

d. *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;*

e. *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;*

The proposed project would create a need for additional water supplies and wastewater treatment services over existing conditions on the generally vacant project site. However, the project is not of a scale that would result in a substantial increase in demand for water supplies or services, nor would it require preparation of a Water Supply Assessment. The 113-unit project also would not require the need for new or expanded wastewater treatment capacity or facilities. Existing services would be sufficient to serve the proposed development and associated water supply and wastewater treatment impacts would be less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; or

g. Comply with federal, state and local statutes and regulations related to solid waste.

The project would create solid waste that would be served by regional landfills. The 113-unit project is not of a scale that would significantly impact solid waste hauling services or landfill facilities. Both construction (including demolition) and operation of the proposed project would comply with applicable federal, state, and local statutes and regulations related to solid waste, and associated impacts would be less than significant.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of biological resources, cultural resources (Tribal Cultural Resources), geology and soils, and noise. With implementation of identified project mitigation measures, however, the project is not expected to have any significant impacts, either long-term or short-term, or result in any substantial adverse effects on human beings, either directly or indirectly. Specifically, the project would not degrade the quality of the environment for plant or animal communities, substantially reduce the habitat of a fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of endangered plants or animals. The project would also not eliminate important examples of the major periods of California history or prehistory. As described, project-related effects either would be avoided by incorporation of project design measures, or mitigated to levels below significance, and no cumulatively considerable impacts would occur. Therefore, the proposed project would not have a significant individual or cumulatively considerable impact on the environment.

SUMMARY OF DESIGN MEASURES AND MITIGATION MEASURES

Design Measures

Air Quality Design Measures

To minimize air quality impacts during construction, the project is required to include the following construction dust control measures into the proposed design. These measures, which would be implemented as a matter of project design, are to be included on all project construction contracts, grading permits, improvement plans, and final maps.

During grading activities for any future development within the General Plan Update planning area boundary, the on-site construction superintendent shall ensure implementation of standard best management practices to reduce the emissions of fugitive dust, including but not limited to the following actions:

- Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water will be applied at a frequency to be determined by the onsite construction superintendent.

- Temporary hydroseeding with irrigation will be implemented on all graded areas on slopes, and areas of cleared vegetation will be revegetated as soon as possible following grading activities in areas that will remain in a disturbed condition (but will not be subject to further construction activities) for a period greater than three months during the construction phase.

- Operate all vehicles on the construction site at speeds less than 15 miles per hour.

- Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer.

- If a street sweeper is used to remove any track-out/carry-out, only PM_{10}-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

Geology and Soils Design Measures

To minimize potential impacts related to seismic ground acceleration, the project would include the following design parameters and recommendations into the proposed design. These measures, which would be implemented as a matter of project design, are to be included on all project construction contracts, grading permits, improvement plans, and final maps.

- Conformance with applicable criteria of the CBC.
- Implementation of appropriate site preparation activities (e.g., clearing/grubbing and removal of buried structures).
- Implementation of geotechnical observation/testing and remedial grading as applicable.
- Implementation of appropriate excavation parameters, such as removal/ replacement and/or recompaction of unsuitable materials including fill and applicable areas of older alluvium.
- Conformance with proper engineered fill composition/placement methodology
- Appropriate design and construction of structures, foundations, trenches, manufactured slopes, retaining walls, pavement, and drainage/irrigation facilities.

Greenhouse Gas Design Measures

Greenhouse gas emissions generated by the project would be less than significant, provided that the project implements the efficiency measures required in the Climate Action Plan CEQA Thresholds for small projects. These measures, which would be implemented as a matter of project design, are to be included on all project construction contracts, grading permits, improvement plans, and final maps.

- Attainment of energy efficiency of at least five percent greater than adopted Title 24 requirements.
- Implementation of water conservation measures that match the CALGreen Building Code in effect as of January 2011.

Hazards and Hazardous Materials Design Measures

To minimize potential wildfire impacts, the project would incorporate the following design measures to address potential hazards. These measures, which would be implemented as a matter of project design, are to be included on all project construction contracts, grading permits, improvement plans, and final maps.

- Incorporation of fire-resistant landscaping.
- Avoidance of excessive or overgrown vegetation.
- Provision of educational materials on wildfire prevention to residents.
- Preparation and implementation of a fire protection plan.

Mitigation Measures

Biological Resources Mitigation Measure

To reduce potentially significant impacts to sensitive biological resources to less-than-significant levels, the following mitigation measure is required.

BIO-1 **Avoidance of Nesting Raptors**. To prevent impacts to nesting raptors protected under the federal MBTA and CFG Code, the City shall enforce the following:

1. If construction occurs during the raptor nesting season (January 15 through July 31), and where any mature tree or structure capable of supporting a raptor nest occurs within 500 feet of proposed project construction activities, the project applicant shall retain a qualified biologist to conduct a pre-construction survey for nesting raptors prior to clearing, grading and/or construction activities. The survey shall be conducted within 72 hours prior to the start of construction. The project applicant shall not be responsible for physically surveying off-site habitat where access is not permitted; the qualified biologist shall visually inspect these off-site areas with the aid of binoculars or a spotting scope.

2. If any nesting raptors are present on or within 500 feet of the proposed project construction area, the project applicant shall retain a qualified biologist to flag and demarcate the location of all nesting raptors and monitor construction activities. Active nests within off-site areas where access is not permitted shall not be flagged or demarcated. Temporary avoidance of active raptor nests, including the enforcement of an avoidance buffer of 500 feet, shall be required until the qualified biologist has verified that the young have fledged or the nest has otherwise become inactive. The avoidance buffer may be reduced at the discretion of the qualified biologist and with written consent from the USFWS and CDFW. If the qualified biologist determines that a narrower buffer is warranted, the qualified biologist shall provide USFWS and CDFW with a written explanation as to why. Based on the submitted explanation, USFWS and CDFW would

determine whether to allow the narrower buffer. Avoidance buffers for active nests within off-site areas where existing developments already occur shall not be required.

Cultural Resources Mitigation Measures

To reduce potentially significant impacts to sensitive cultural resources (Tribal Cultural Resources) to less-than-significant levels, the following mitigation measures are required.

CUL-1 The City's Planning Division recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

CUL-2 Prior to issuance of a grading permit, the applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the project archaeologist that confirms the selected Native American monitor is associated with a TCA Tribe. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

CUL-3 The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

CUL-4 During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

CUL-5 In the event that previously unidentified Tribal Cultural Resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources.

Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

CUL- 6 If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

CUL-7 The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant Tribal Cultural Resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

CUL-8 As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

CUL-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified Archaeologist does not collect the cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's

cultural and spiritual traditions. Any Tribal Cultural Resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

CUL-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

Geology and Soils Mitigation Measure

To reduce potentially significant geology and soils impacts to less-than-significant levels, the following mitigation measure is required.

GEO-1 **Implementation of Geotechnical Recommendations.** The site-specific Geotechnical Investigation includes a number of general and specific recommendations that shall be implemented in the design and construction of the proposed project to minimize (a) the potential for exposure to soils with corrosive properties and associated potential for deterioration and eventual failure of underground concrete and metal structures, and (b) the potential concern associated with expansive soils on site, as summarized herein. Corrosion recommendations that shall be implemented include, but are not limited to: (1) removal of unsuitable deposits and replacement with non-corrosive fill; (2) use of corrosion-resistant construction materials (e.g., coated or non-metallic facilities); and (3) installation of cathodic protection devices (e.g., use of a more easily corroded “sacrificial metal” to serve as an anode and draw current away from the structure to be protected). Expansive soils recommendations that shall be implemented include, but are not limited to: (1) removal of unsuitable materials during site preparation and grading; (2) confirmation that fill material exhibits “very low” or “low” expansion potential (per CBC standards); and (3) testing of proposed fill materials for suitability (including expansion potential). Finally, site grading plans shall be reviewed by a qualified geotechnical consultant prior to final design submittal to determine if additional analysis and recommendations beyond those summarized above (and listed in full in the Geotechnical Investigation) are required. Any and all geotechnical recommendations shall be fully implemented in accordance with applicable industry/regulatory standards (e.g., the CBC requirements).

Noise Mitigation Measures

To reduce potentially significant noise impacts to less-than-significant levels, the following mitigation measures are required.

NOI-1 **Interior Noise Attenuation.** Interior noise levels for the proposed residences shall not exceed 45 CNEL. Once specific building plan information is available, additional exterior-to-interior noise analysis shall be conducted for the proposed residences that face Brotherton Road or S. Centre City Parkway where exterior noise levels are expected to exceed 60 CNEL to demonstrate that interior levels do not exceed 45 CNEL. The information in the analysis shall include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. The analysis shall also assume a windows-closed condition and that vehicles on Centre City Parkway are traveling at 50 mph. With this specific building plan information, the analysis shall determine the predicted interior noise levels at the planned on-site buildings. If predicted noise levels are found to be in excess of 45 CNEL, the report shall identify architectural materials or techniques that could be included to reduce noise levels to 45 CNEL in habitable rooms. Standard measures such as glazing with STC ratings from a STC 22 to STC 60, as well as walls with appropriate STC ratings (34 to 60), should be considered.

Appropriate means of air circulation and provision of fresh air would be provided to allow windows to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2001 California Building Code).

NOI-2 **Vibration Attenuation.** The construction contractor shall not operate a vibratory roller, or equipment with the potential to result in an equivalent level of vibration, that results in a level that exceeds 80 VdB at off-site residences or 83 VdB at the off-site KinderCare childcare center. Operation of a vibratory roller or equivalent shall be avoided within 75 feet of any off-site residence or 60 feet of the off-site childcare center.

MATERIALS USED IN PREPARATION OF THIS ANALYSIS

The following materials were used during the preparation of this document. The project-specific technical reports listed below are on file with the City of Escondido and available online.

Project-specific Technical Reports

Christian Wheeler Engineering (Christian Wheeler)
2015 Geotechnical Investigation Del Prado. August 31.

HELIX Environmental Planning, Inc. (HELIX)
2015 Air Quality and Greenhouse Gas Emissions Calculations for the Del Prado Project. August 17.

KOA Corporation (KOA)
2015 Del Prado Escondido Traffic Impact Study. August.

Masson & Associates (Masson)

2016 Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Del Prado. January 29.

2015a Preliminary Drainage Study for Del Prado, 2329 Centre City Parkway, Escondido, California. July 24.

QA(2) Environmental

2005 Phase I Environmental Site Assessment for Two Vacant Lots on West Side of South Center City Parkway. May 21.

Recuerdos Research (Recuerdos)

2015 Archaeological and Paleontological Letter Report for a Negative Survey of the Del Prado North and South Project. September 23.

Specific Cited References

Brown and Caldwell

2011 Final Hydromodification Management Plan, County of San Diego, California. March.

California Air Resources Board (CARB)

2014 May. First Update to the Climate Change Scoping Plan: Building on the Framework. Available at: http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

California Department of Conservation

2013 San Diego County Important Farmland Map. Available at: http://www.conservation.ca.gov/dlrp/fmmp/Pages/SanDiego.aspx.

California Environmental Protection Agency (CalEPA)

2015 Cortese List Sites, including: EnviroStor Hazardous Waste and Substances Site List; GeoTracker Site, San Diego County; RWQCB Cease and Desist/Cleanup and Abatement orders; and Department of Toxic Substances Control (DTSC) List of Hazardous waste Facilities Subject to Corrective Action. Available at: http://www.calepa.ca.gov/SiteCleanup/CorteseList/.

California Geological Survey (CGS)

2007 Fault-Rupture Hazard Zones in California. Special Publication 42.

California Stormwater Quality Association (CASQA)

2009 Stormwater Best Management Practice Handbook Portal: Construction. November.

City of Escondido

2013 City of Escondido Greenhouse Gas Emissions Adopted CEQA Thresholds and Screening Tables. Community Development Department. December 4.

2012a City of Escondido General Plan. May. Available at: http://www.escondido.org/general-plan.aspx.

City of Escondido (cont.)

2012b City of Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report. April 23.

2011 City of Escondido Standard Urban Storm Water Mitigation Plan (SUSMP) for Development Projects. January.

2008 Jurisdictional Urban Runoff Management Plan. March.

County of San Diego (County)

2011 San Diego County General Plan, A Plan for Growth, Conservation and Sustainability. August 3.

2010 Unified San Diego County Emergency Services Organization Operational Area Emergency Plan. October. http://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/plans/op-area-plan/2014/2014-OA-EOP-Annex-Q-Evacuation.pdf.

2007 Guidelines for Determining Significance: Air Quality. Department of Planning and Land Use.

Federal Emergency Management Agency (FEMA)

2012a Flood Insurance Rate Map (FIRM), San Diego County and Incorporated Areas. Panel No. 06073C1077G. May 16.

2012b Flood Insurance Rate Map (FIRM), San Diego County and Incorporated Areas. Panel No. 06073C1079G. May 16.

KOA Corporation (KOA)

2015 Del Prado Escondido Traffic Impact Study. August.

Masson & Associates, Inc. (Masson)

2016 Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Del Prado. January 29.

2015a Preliminary Drainage Study for Del Prado, 2329 Centre City Parkway, Escondido, California. July 24.

2015b Personal Communication between Messrs. Bruce Tait or Masson, and Dennis Marcin of HELIX Environmental Planning, Inc. August 18.

(QA)2 Environmental

2005 Phase I Environmental Site Assessment for Property at: Two vacant Lots on West Side of S. Centre City Parkway, APN 238-130-35 & -36, Escondido, California. May 21.

REC Consultants (REC)

2015 Technical Memorandum: SWMM Modeling for Hydromodification Compliance of Del Prado North. July 17.

San Diego Association of Governments (SANDAG)
2014 Data Surfer. http://datasurfer.sandag.org/download/sandag_estimate_2014_jurisdiction_escondido.pdf

2008 Final 2008 Congestion Management Program Update. November.

San Diego Gas & Electric Company (SDG&E)
2015 Understanding Electric and Magnetic Fields pamphlet.

Stantec Consulting Services, Inc. (Stantec)
2013 Revised Corrective Plan, Former ARCO Facility No. 1948. 2306 South Escondido Blvd., Escondido, California. SAM Case No. H05186-004. November 12.

State Water Resources Control Board (SWRCB)
2015 Clean Water Act Section 303(d) 2010 List of Water Quality Limited Segments (including potential sources). Available at: http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml.

General References

1. Escondido Zoning Code and Land Use Maps
2. Escondido Municipal Code
3. USGS 7.5-Minute Topographic Quadrangle Map; Escondido
4. Site Visits/Field Inspections
5. Project Description & Preliminary Information

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Attachment A

IS CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION

On the basis of this initial evaluation that follows:

☐ The proposed project is exempt from CEQA pursuant to the general exemption (CEQA Guidelines, 15061 (b)(3)), a statutory exemption, and/or a categorical exemption, and that if a categorical exemption, none of the exceptions to the exemption apply. A NOTICE OF EXEMPTION will be prepared.

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental document is required. FINDINGS consistent with this determination will be prepared.

Signature

2.29.16
Date

EVALUATION OF ENVIRONMENTAL IMPACTS

This section evaluates the potential environmental effects of the proposed project using the environmental checklist from the State CEQA Guidelines as amended. The definitions of the response column headings include the following:

A. "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.

B. "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 (mitigation measures from earlier analyses may be cross-referenced).

C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which 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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

I. Agriculture and Forestry Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farm-land of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	□	□	□	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	□	□	□	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	□	□	□	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	□	□	□	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	□	□	□	■

II. Air Quality

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	□	□	□	■
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	□	□	■	□
c. 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 (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	□	□	■	□

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose sensitive receptors to substantial pollutant concentrations?	□	□	■	□
e. Create objectionable odors affecting a substantial number of people?	□	□	■	□

III. Biological Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	□	■	□	□
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	□	□	□	■
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	□	□	□	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	□	□	□	■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	□	□	■	□
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

IV. Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	□	□	■	□
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	□	□	■	□
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	□	■	□
d. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□
e. Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code § 21074?	□	■	□	□

V. Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	□	□	■	□
ii. Strong seismic ground shaking?	□	□	■	□
iii. Seismic-related ground failure, including liquefaction?	□	□	■	□
iv. Landslides?	□	□	■	□
b. Result in substantial soil erosion or the loss of topsoil?	□	□	■	□

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	□	■	□	□
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	□	■	□	□
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	□	□	□	■

VI. Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	□		■	□
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	□	□	■	□

VII. Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	□	□	■	□
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	□	□	■	□

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	□	□	■	□
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	□	□	■	□
e. For a project located within an airport land use plan 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 for people residing or working in the project area?	□	□	□	■
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	□	□	□	■
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	□	□	■	□
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	□	□	■	□

VIII. Hydrology and Water Quality

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	□	□	■	□
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	□	□	■	□

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?	□	□	■	□
d. 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 which would result in flooding on or off site?	□	□	■	□
e. Cause significant alteration of receiving water quality during or following construction?	□	□	■	□
f. Cause an increase in impervious surfaces and associated runoff?	□	□	■	□
g. 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?	□	□	■	□
h. Cause potentially significant adverse impact on groundwater quality?	□	□	■	□
i. Cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	□	□	■	□
j. Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?	□	□	■	□
k. Create or exacerbate already existing environmentally sensitive areas?	□	□	■	□
l. Create potentially significant environmental impacts on surface water quality to either marine, fresh, or wetland waters?	□	□	■	□
m. Impact aquatic, wetland, or riparian habitat?	□	□	■	□
n. Otherwise substantially degrade water quality?	□	□	■	□
o. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	□	□	□	■
p. Place within a 100-year flood hazard area, structures which would impede or redirect flood flows?	□	□	□	■

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
q. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	□	□	□	■
r. Inundation by seiche, tsunami, or mudflow?	□	□	□	■

IX. Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	□	□	□	■
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	□	□	■	□
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	□	□	□	■
d. Have a substantial adverse effect on a scenic vista?	□	□	□	■
e. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	□	□	□	■
f. Substantially degrade the existing visual character or quality of the site and its surroundings?	□	□	■	□
g. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	□	□	■	□

X. Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	□	□	□	■
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	□	□	□	■

XI. Noise

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	□	■	□	□
b. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	□	■	□	□
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	□	□	■	□
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	□	□	■	□
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 expose people residing or working in the project area to excessive noise levels?	□	□	□	■
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	□	□	□	■

XII. Population and Housing

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	□	□	■	□
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	□	□	□	■
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	□	□	□	■

XIII. Public Services

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

XIV. Recreation

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

XV. Transportation/Traffic

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause the level of service (LOS) of a circulation element street to fall below a mid-range of LOS "D" and/or add more than 200 ADT to a circulation element street with a level of service (LOS) below the mid-range "D" yet above LOS "F?" According to the Escondido General Plan, the minimum acceptable LOS is "C"	□	□	■	□
b. Exceed, either individually or cumulatively, a level of service established by the county congestion management agency for designated roads and highways?	□	□	□	■
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	□	□	□	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	□	□	□	■
e. Result in inadequate emergency access?	□	□	■	□
f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	□	□	□	■

XVI. Utilities and Service Systems

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	□	□	■	□
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	□	□	■	□
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	□	□	■	□
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	□	□	■	□
e. 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?	□	□	■	□
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	□	□	■	□
g. Comply with federal, state, and local statutes and regulations related to solid waste?	□	□	■	□

XVII. Mandatory Findings of Significance

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