ADDENDUM TO THE FINAL MITIGATED NEGATIVE DECLARATION FOR THE ESCONDIDO INNOVATION CENTER PROJECT

Project Case #PHG 16-0012; ENV 16-0008; Ordinance No. 2017-02
Address: 1925 Harmony Grove Road
Escondido, CA 92029
Assessor Parcel No. 235-050-5800

Prepared for:

City of Escondido
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November 2017

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A. Introduction

On January 11, 2017, the Escondido City Council adopted a Mitigated Negative Declaration (MND) and Mitigation Monitoring Program for the Escondido Innovation Center (EIC) Project (PHG 16-0012; ENV 16-0008; Ordinance No. 2017-02), referred to herein as the EIC MND. The Initial Study and MND evaluated the impacts of a proposed industrial development on 5.76 acres, south of Harmony Grove Road in the City of Escondido. The analysis identified several mitigation measures to address and mitigate potentially significant impacts to less than significant levels. The adopted EIC MND is included as Appendix A.

The EIC Project (PHG 16-0012; ENV 16-0008) had a companion industrial development planned for construction on 5.25 acres of land immediately to the south, also on the southern side of Harmony Grove. The City Council adopted a Mitigated Negative Declaration (MND) and Mitigation Monitoring Program for this project, called the Victory Industrial Park (VIP) (PHG 15-0042; ENV 15-0017), on September 28, 2016. Subsequent to the EIC and VIP project approvals in January 2017 and September 2016 respectively, the applicant has refined the project details and design, including: (1) the consolidation of the EIC and VIP planned development sites into a 11.04-acre site and (2) construction of a larger industrial building within a larger project footprint. Other project revisions are listed in Section D of this document. In accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, the City, acting as a lead agency, must accumulate and evaluate EIC and VIP Project revisions into a single CEQA addendum. This addendum addresses the proposed modifications to the EIC Project and provides an evaluation of potential environmental impacts in relation to the original project evaluated in the adopted MND for the EIC Project. The addendum is an informational document, intended to be used in the planning and decision making process as provided for under Section 15164 of the CEQA Guidelines. The addendum does not recommend approval or denial of the proposed modification to the project. The conclusion of this addendum is that the proposed changes to the project will neither result in new significant impacts nor substantially increase the severity of previously disclosed impacts beyond those already identified in the previously adopted MND. Thus, a subsequent MND need not be prepared.

B. Statutory Background

The City of Escondido is the CEQA lead agency responsible for the proposed EIC Center project. Under the CEQA, an addendum to a certified Environmental Impact Report (EIR) or a Negative Declaration may be prepared if minor technical changes or additions to the proposed project are required or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR [or MND] have occurred (CEQA Guidelines § 15164[b]). An addendum is appropriate if the project changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The addendum need not be circulated for public review (CEQA Guidelines §15164[c]); however, an addendum is to be considered along by the

decision-making body prior to making a decision on the project (CEQA Guidelines § 15164[d]).

This MND addendum demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the EIC MND remain substantively unchanged by the revised project description detailed herein and supports the finding that the proposed project does not raise any new issues and does not exceed the level of impacts identified in the previous MND. Further, rather than only focusing on the characterization of whether the project is "new" or "old," the City has also evaluated the previous environmental document to determine if it retains any relevance in light of the proposed changes, and if any major revisions to the document are required due to the involvement of new, previously unstudied significant environmental effects. The subsequent review provisions of CEQA are designed to ensure that an agency proposing changes to a previously approved project explores environmental impacts not considered in the original environmental document. This assumes that some of the environmental impacts of the modified project are considered in the original environmental document, such that the original document retains relevance to the decision-making process. If it is wholly irrelevant, then it is only logical that the agency starts over from the beginning. The City has determined that project changes will not require major revisions to the initial environmental document. Accordingly, recirculation of the MND for public review is not necessary pursuant to Section 15164 of the CEQA Guidelines. Therefore, a decision was made by the City of Escondido not to prepare a subsequent Negative Declaration pursuant to Section 15162 of the CEQA guidelines. To support this decision, the following discussion describes the proposed project modifications and the associated environmental analysis.

C. Summary of Original Project Description

The EIC MND evaluated two options for industrial development on a 5.76-acre site (1925 Harmony Grove Road; Assessor's Parcel Number [APN] 235-050-5800). Option A considered development of the site with one 98,500-square-foot industrial building and Option B considered development of the site with three industrial buildings with a total square footage of 86,010 square feet. The project square footage for Option A is used for comparative purposes in this addendum, as it represents the worst case project for purposes of evaluating impacts of the proposed project changes. The EIC MND project boundaries and site plan for Option A are shown in Figures 1 and 2, respectively. Approximately 15,000 to 18,000 cubic yards of import were proposed to raise the elevation of the site above the 100-year flood elevations, to approximately 624 feet above mean sea level (AMSL). Primary access to the site was identified at the western project boundary via Harmony Grove Road. A driveway along the northern perimeter was also proposed, with its use being limited to smaller trucks and vehicles. The project included improvements to Harmony Grove Road along the property's western frontage, as well as construction of new curb, gutter, and pavement.

The EIC MND found potentially significant impacts would occur to biological resources (raptors, nesting birds, and non-native grasslands), land use (a conflict with applicable habitat conservation plan), cultural resources and tribal cultural resources (potential

disturbance of resources during grading), paleontological resources (potential disturbance of fossils during grading), and transportation/traffic (Harmony Grove/Hale Avenue intersection; Harmony Grove Road from Project Access A to Enterprise Street; Harmony Grove Road from Enterprise Street to Hale Avenue; and Hale Avenue from Harmony Grove Road to 9th Avenue). Mitigation was incorporated that would reduce all impacts to less than significant.

D. Project Revisions

Since adoption of the EIC MND, revisions to the project are proposed to allow for development of a larger industrial building over an expanded project footprint. Specifically, the project changes are identified below:

- Increase in project footprint from 5.76 acres to 11.04 acres
- Change in occupancy mix from industrial park/office to warehousing
- Increase in industrial square footage from 98,500 square feet to 212,088 square feet of industrial space
- A 8,700-cubic-yard reduction in required import compared to the import requirements identified for the EIC Project (PHG 16-0012; ENV 16-0008) and the VIP Project (PHG 15-0042; ENV 15-0017) combined
- Increase in parking spaces from 198 spaces to 220 spaces
- Increase in the height of the wall adjacent to residences to the north from 6 feet to 8 feet tall based on requests from adjacent property owners (Appendix B)
- Redesign of bioretention areas
- Shift main project entry driveway to the south approximately 125 feet

The revised project footprint and site plan are shown in Figures 3 and 4, respectively. The revised project would develop a 212,088-square-foot industrial building on a triangular-shaped 11.04-acre project site. The building would accommodate 201588 square feet of warehouse space in addition to 10,500 square feet of office space. The design of the wall adjacent to residents to the north was revised to an 8-foot-tall wall to accommodate a request by the adjacent property owners to increase the wall height. Three detention basins would be installed on the project site, located at each of the three corners of the site. The main access to the project site would be from the west side of the project site, approximately 550 feet south of Enterprise Street. A secondary project access driveway would be provided at the north end of the project site along Harmony Grove Road. Truck access would be limited to the main project access on the west side of the project site. Surface parking, landscaping, and fire and emergency access drives would be provided around the perimeter of the building. Parking for 220 vehicles (including seven accessible stalls) and 14 trailer truck stalls would be provided on-site. Refer to Figure 5 for the project landscape plan. Figures 6, 7 and 8 provide north-south, west and east elevations of the proposed buildings, respectively. Figures 9a through 9c provide project renderings.

The focus of the impact analysis contained herein will focus on whether the expanded project footprint and increased industrial square footage proposed with the revised EIC

project would result in any new or more severe impacts not previously identified in the adopted EIC MND.

E. Environmental Setting

Project site is located in the City of Escondido, west of Interstate 15, and south of State Route 78. The site is located at the eastern terminus of Enterprise Street, south and east of Harmony Grove Road, and just north of Escondido Creek. The project site encompasses two parcels (APNs 235-050-1500 and 235-050-5800) totaling 11.4 acres. The EIC MND evaluated development on the northern project parcel (APN 235-050-5800) only. The northern project parcel is undeveloped, consisting of non-native grassland, eucalyptus woodland, and disturbed lands. The revised project footprint now encompasses a larger 11.04-acre area that includes the parcel directly to the south of the original project area. This southern project parcel was recently approved for development with two industrial buildings totaling 91,000 square feet in addition to associated surface parking, landscaping, and infrastructure (Victory Industrial Park; PHG 15-0042; ENV15-0017 approved by City Council September 28, 2016). Since adoption of the Victory Industrial Park (VIP) MND, a grading permit for the VIP project site was issued and the site has been graded. Thus, the existing condition of the expanded project footprint is disturbed from recent grading and site preparation for development.

The area surrounding the project site is generally developed with industrial uses to the west and northwest; single-family residences immediately adjacent to the north (north and south of Harmony Grove Road), and the natural drainage channel of Escondido Creek located along the eastern and southern boundary of the project site. The Escondido Hale Avenue Resource Recovery Facility (HARRF) is located southeast of the site across Escondido Creek with large rural-estate residential development further to the southwest. The Escondido Creek is in a concrete-lined channel north of the project site and is a natural channel along the eastern boundary of the project site with a paved utility maintenance access road that runs along the channel adjacent to the project site.

Image Source: Nearmaps (flown June 2017)

0 Feet 150

Project Boundary

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FIGURE 1

EIC MND Project Boundary

Map Source: Smith Consulting Architects

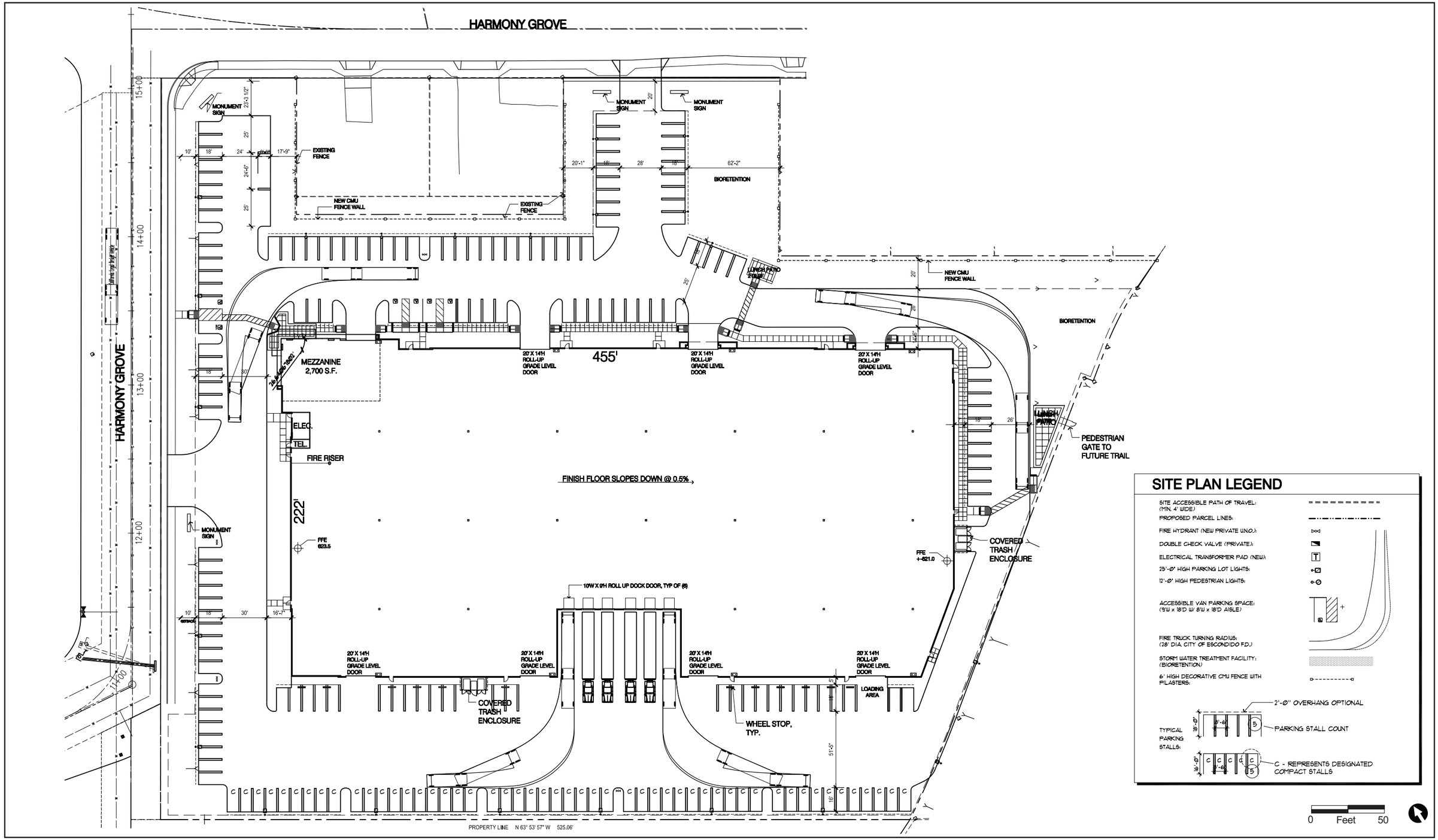

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FIGURE 2
EIC MND Site Plan (Option A)

Image Source: Nearmaps (flown June 2017)

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Project Boundary

FIGURE 3
Revised EIC Project Boundary

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Map Source: Ware Malcomb

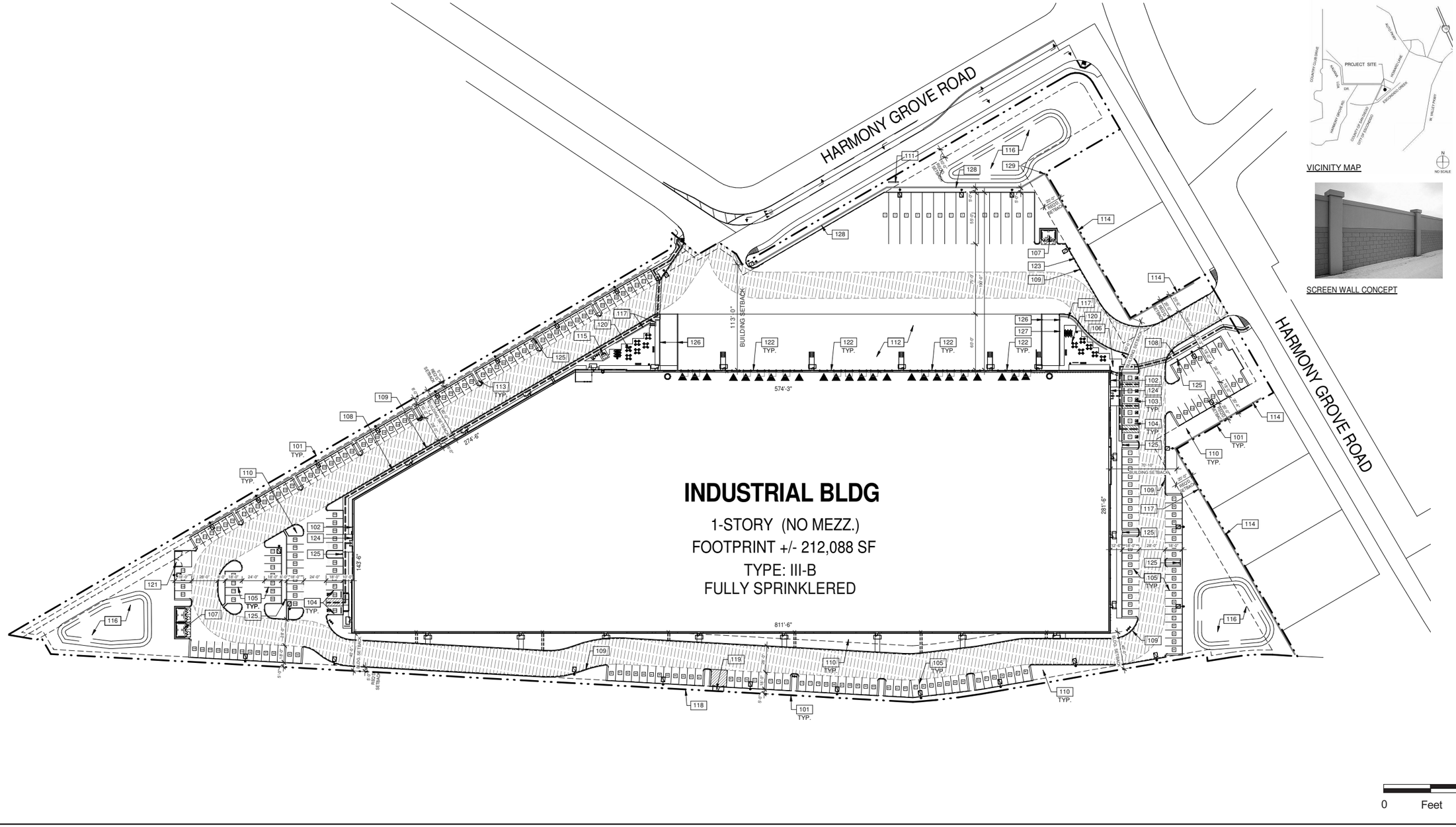

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FIGURE 4
Revised EIC Site Plan

Map Source: Ware Malcomb

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
TREES						
	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX	PER PLAN	M	PERIMETER TREE
	OLEA WILSONII OR CERCIDIUM 'DESERT MUSEUM'	FRUITLESS OLIVE OR DESERT MUSEUM PALO VERDE	36" BOX	PER PLAN	L	ACCENT TREE
	PINUS ELDARICA	AFGHAN PINE	24" BOX	PER PLAN	L	CONIFEROUS SCREEN & PARKING CANOPY
	QUECUS AGRIFOLIA	COAST LIVE OAK	15 GAL	PER PLAN	M	SCREENING TREE
	PLATANUS ACERFOLIA 'YARWOOD'	LONDON PLAN TREE	15 GAL	PER PLAN	M	LARGE SHADE TREE
	RHUS LANCEA	AFRICAN SUMAC	24" BOX	PER PLAN	L	PARKING LOT TREE
SHRUBS, GRASSES, & GROUNDCOVERS						
BUL FRU	BULBINE FRUTESCENS	ORANGE STALKED BULBINE	1 GAL.	30" O.C.	L	FLOWERING SHRUB
LAN 'NG'	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	L	FLOWERING LOW SHRUB
LEU 'GC'	LEUCOPHYLLUM 'GREEN CLOUD'	GREEN CLOUD TEXAS RANGER	5 GAL.	48" O.C.	L	FLOWERING SHRUB
MAC UNG	MACFADYENA UNGUIS-CATI	CAT'S CLAW	1 GAL.	8' O.C.	L	FLOWERING VINE
MUH 'RM'	MUHLENBERGIA C. 'REGAL MIST'	PINK MUHLY GRASS	1 GAL.	36" O.C.	L	FLOWERING GRASS
RHA CLA	RHAPHIOLEPIS INDICA 'CLARA'	INDIAN HAWTHORN	5 GAL.	36" O.C.	L	EVERGREEN SHRUB
ROS OFF	ROSMARINUS OFFICIALIS	ROSEMARY	FLATS	24" O.C.	L	EVERGREEN SHRUB
SES AUT	SESLERIA AUTUMNALIS	AUTUMN MOOR GRASS	1 GAL.	30" O.C.	M	GRASS
WES 'WG'	WESTRINGIA FRUTICOSA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
BIORETENTION AREAS						
	BIOFILTRATION SOD BY S&S SEEDS - STIPA PULCHARA - FESTUCA RUBRA - HORDEUM CALIFORNICUM - HORDEUM BRACHYANTHERUM		SEED MIX	--	M	--

NOTE: WATER USE LEGEND, H = HIGH, M = MODERATE, L = LOW. WUCOLS REGION 4.

NOTES:
1. ROOT BARRIERS SHALL BE INSTALLED AT ALL TREES WITHIN 5 FEET OF ANY HARDSCAPE, PAVEMENT, CURB OR WALLS. ROOT BARRIERS ARE TO BE 'UB24-2' BY DEEP ROOT CORPORATION, (800) 458-7668, INSTALLED PER MANUFACTURER'S SPECIFICATIONS. NOTE: ROOT BARRIERS SHALL NOT BE WRAPPED AROUND THE ROOTBALL.
2. MULCH ALL LANDSCAPE AREAS HAVING LESS THAN A 2:1 SLOPE WITH A 3" LAYER OF MULCH, PER SPECIFICATIONS, AT THE CONCLUSION OF PLANTING OPERATIONS. PROVIDE JUTE NETTING WITH 12" LONG SOIL STAPLES ON SLOPES 2:1 OR GREATER.

LANDSCAPE TABULATIONS

TOTAL PARKING LOT TREES	
TOTAL PARKING SPACES =	220
(152 STANDARD, 61 COMPACT, 7 ADA)	
PARKING LOT TREES REQUIRED (1 TREE / 4 STALLS) =	55
PARKING LOT TREES PROVIDED =	58

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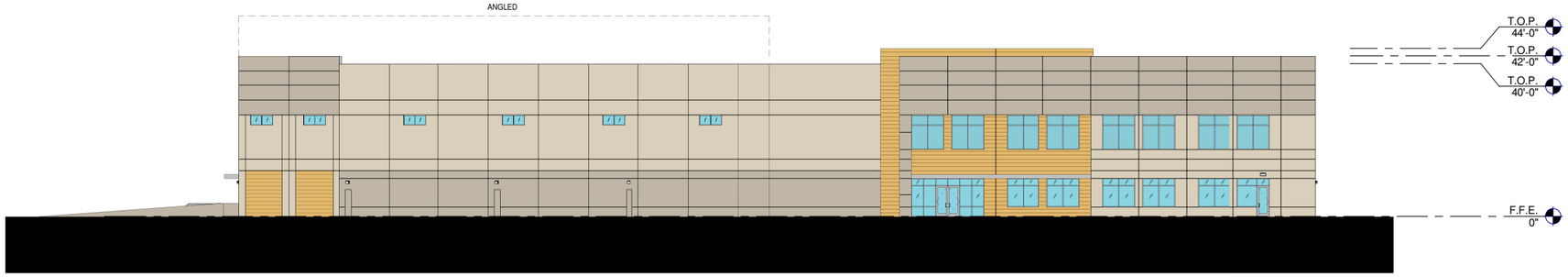
FIGURE 5
Landscape Plan

Map Source: Ware Malcomb

NORTH - EXTERIOR ELEVATION (A)

SCALE: 1/16" = 1'-0"



SOUTH - EXTERIOR ELEVATION (B)

SCALE: 1/16" = 1'-0"

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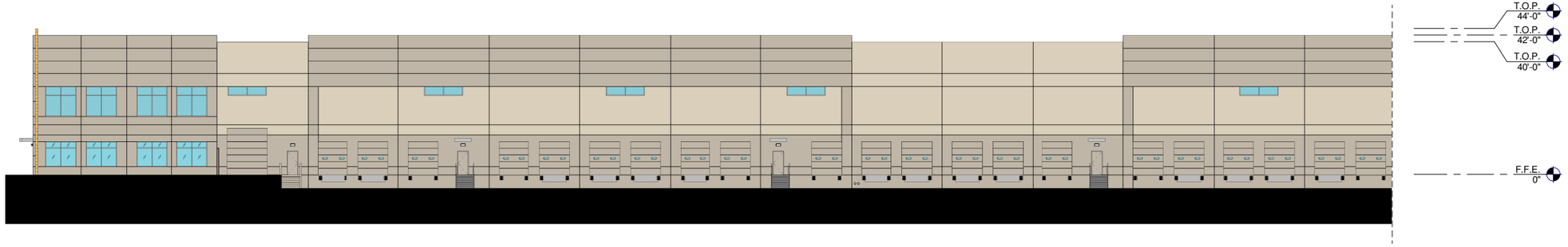
FIGURE 6
North-South Elevations

Map Source: Ware Malcomb

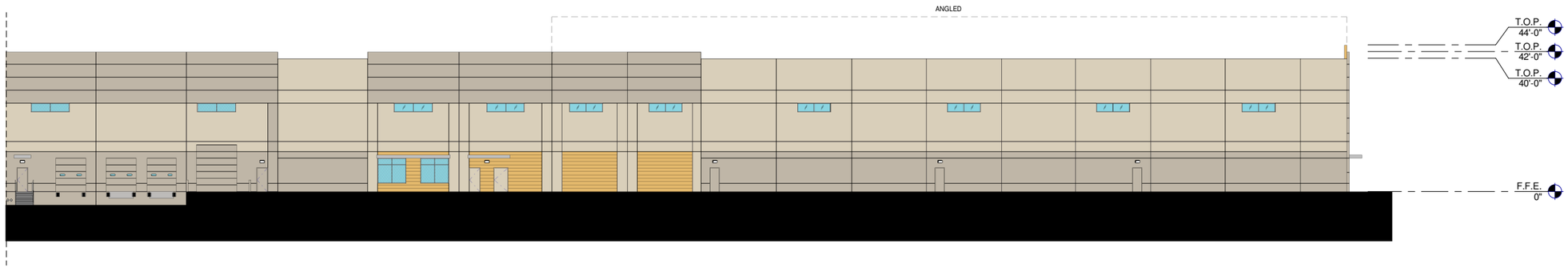
WEST - EXTERIOR ELEVATION- OVERALL C

SCALE: 1/32" = 1'-0"



WEST - EXTERIOR ELEVATION- PARTIAL C1

SCALE: 1/16" = 1'-0"



WEST - EXTERIOR ELEVATION- PARTIAL C2

SCALE: 1/16" = 1'-0"

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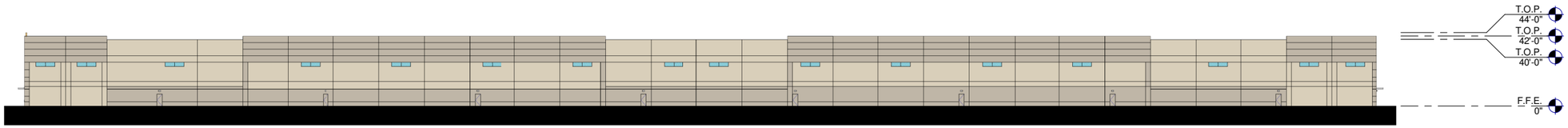
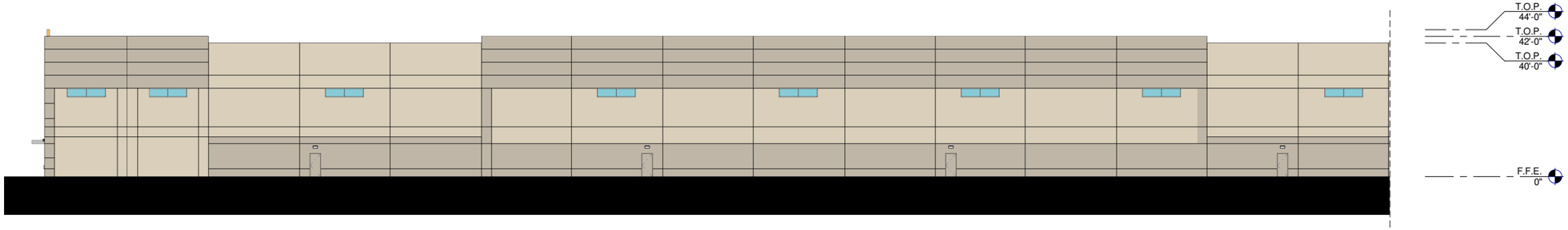
FIGURE 7
West Elevations

Map Source: Ware Malcomb



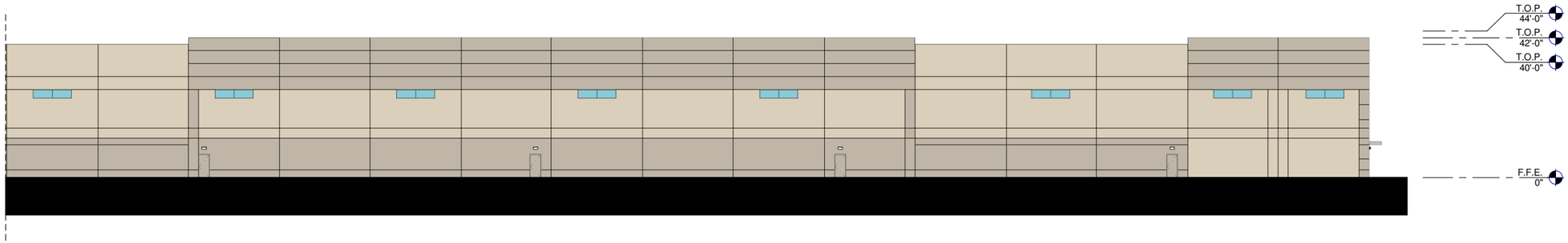
EAST - EXTERIOR ELEVATION- OVERALL D

SCALE: 1/32" = 1'-0"



EAST - EXTERIOR ELEVATION- PARTIAL D1

SCALE: 1/16" = 1'-0"



EAST - EXTERIOR ELEVATION- PARTIAL D2

SCALE: 1/16" = 1'-0"

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FIGURE 8
East Elevations

Map Source: Ware Malcomb

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FIGURE 9a
Project Renderings

Map Source: Ware Malcomb

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FIGURE 9b
Project Renderings

Map Source: Ware Malcomb

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FIGURE 9c
Project Renderings

F. Impact Analysis

This document is an addendum to the previously adopted EIC MND referenced above. This MND addendum provides the project-specific environmental review pursuant to the CEQA to demonstrate the adequacy of the EIC MND relative to the revised project. As indicated above, the previous MND identified significant impacts and mitigation related to biological resources, cultural resources and tribal cultural resources, paleontological resources, and transportation/traffic. The analysis below discusses the adequacy and applicability of previous mitigation measures to the proposed project. In addition, the analysis below addresses whether any new or more severe impacts would result from the project revisions and whether any additional mitigation measures beyond those previously identified in the MND would be required.

1. Aesthetics

Escondido Innovation Center MND

The EIC MND identified a less than significant impact related to aesthetics. The MND found that the project site is not located within the immediate vicinity of notable ridgelines, that public views are limited, and that the project would not have an adverse effect on a scenic vista identified in the City's General Plan. In addition, the project would have no impact on a scenic resource within a state scenic highway corridor, as there are no officially designated or eligible highways within the project area and there are no scenic resources on the project site.

In addition, the EIC MND found that with the proposed building architectural details, proposed landscaping, and truck circulation plan that directs large truck traffic to the western project driveway, the proposed industrial operations would not substantially degrade the existing character or quality of the site and its surroundings, and impacts would be less than significant. The EIC MND found that impacts associated with lighting and glare would be less than significant, as new nighttime lighting as a result of the project would be compatible with existing development and would not adversely affect nighttime views in the area, as all new lighting would be required to be in compliance with the City's Outdoor Lighting Ordinance (Escondido Municipal Code, Chapter 33, Article 35).

Revised Project

The revised project would result in development of a larger industrial building over a larger area, and would increase building height from 38 feet to 40 feet. Additionally, building parapets and architectural features would be provided in certain locations that would increase the height of the structure up to 44 feet. Overall, while the square footage of the project would be greater, the overall scale and architectural features would be similar to the original project and to industrial developments in the surrounding area. Refer to Figures 6 through 8 for project elevations showing architectural features and Figures 9a through 9c for project renderings. The building design would incorporate architectural variation in

materials, colors, and design elements that would break up the massing of the structure and provide visual interest. Similar to the EIC, the project would not be located within the immediate vicinity of notable ridgelines, and the project would not have an adverse effect on a scenic vista identified in the City's General Plan. Views from the surrounding roadways adjacent to the project site do not include any scenic resources that are identified as significant, and there are no designated state scenic highways within the project area.

Development of the larger industrial building would alter the existing character of the vacant property; however, development would be consistent with the light industrial buildings in the surrounding area. The larger footprint included with new proposed changes is of the type and intensity of use generally characteristic of the surrounding industrial area. The proposed buildings would be designed with exterior colors, materials, and architectural features compatible with adjacent industrial development and surrounding land uses, similar to the EIC project. The on-site buildings would be set back from the property line per the City of Escondido's Development Standard setback criteria. The bulk, scale, and design of the proposed buildings would be consistent with the visual character and quality of the surrounding area. The project would comply with the City's Municipal Code for lighting. All loading areas would be screened from view, to the maximum extent possible, with a screening wall that is of high-quality material and compatible to the main structure on the subject site and to other structures nearby. Therefore, the visual character and quality impacts of the project would be less than significant, consistent with the EIC MND.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

2. Agricultural Resources

Escondido Innovation Center MND

The EIC MND identified no impact related to agricultural and forest/timberland resources, as the project site is not used for agriculture or forestry and the area has been developed with single-family residences and light industrial uses. The site is not zoned for agricultural or forest land uses and is not adjacent to areas zoned for or in agricultural use or forestland. The EIC MND identified no impact related to agricultural or forestry resources.

Revised Project

The new project area added to the project site has not been used for agricultural resources or forestry, is not adjacent to such uses, and is not zoned or designated for agriculture or forestry uses. Thus, similar to the EIC MND, the revised project would have no impact to agricultural, forestry, or timberland resources.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

3. Air Quality

Escondido Innovation Center MND

The Air Quality Analysis prepared for the EIC MND concluded that the project would have a less than significant impact related to air quality and odors, and that the project would not conflict with or obstruct implementation of the Regional Air Quality Strategy (RAQS) or the California State Implementation Plan (SIP). Additionally, the EIC MND concluded that project construction and operational emissions would not exceed significance thresholds as determined under the Escondido Municipal Code. As such, the project would not generate emissions in quantities that would result in an exceedance of the National Ambient Air Quality Standards or California Ambient Air Quality Standards for ozone, particulate matter less than 10 microns (PM_{10}) or 2.5 microns ($PM_{2.5}$) in diameter. Emissions would be less than significant and, therefore, the project would not result in a cumulatively considerable increase in any criteria pollutant for which the region is in nonattainment. In addition, the MND concluded that fugitive dust emissions would be temporary and would not generate an ongoing, substantial source of emissions that could adversely affect surrounding sensitive receptors, as the project would be required to comply with San Diego Air Pollution Control District rules and regulations.

Revised Project

The revised project would result in a greater square footage of industrial uses compared to what was analyzed in the EIC MND. Thus, the revised project was evaluated in an Air Quality Analysis prepared by RECON Environmental, Inc., dated August 28, 2017 (Appendix C). The air quality analysis was conservative as it was based on a slightly larger building square footage (212,275 sf analyzed versus 212,088 sf proposed) and was based on trip generation estimates of this larger square footage. As detailed in the air quality analysis, no additional significant impacts were identified as a result of the revised project square footage and project footprint. Similar to the EIC MND, the proposed light industrial use would be consistent with the General Plan land use designation for the site, which is LI-Light Industrial and ensures that the project would be consistent with the RAQS. As detailed in Appendix C and summarized below, project emissions are not anticipated to exceed applicable regional thresholds for either construction or operation emissions. Table 1 summarizes the estimated construction emissions generated by the revised project, while Table 2 summarizes the estimated operational emissions generated by the revised project.

Table 1 Summary of Worst-case Construction Emissions (pounds per day)						
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Site Preparation	5	48	23	0	21	12
Excavation/Shoring	5	60	36	0	11	6
Building Construction	3	28	22	0	3	2
Paving	2	15	15	0	1	1
Architectural Coatings	15	2	2	0	0	0
Maximum Daily Emissions	**15**	**60**	**36**	**0**	**21**	**12**
Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*

Table 2 Summary of Project Operational Emissions (pounds per day)						
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	5	0	0	0	0	0
Energy Sources	0	0	0	0	0	0
Mobile Sources	2	16	19	0	5	1
Total	**7**	**16**	**20**	**0**	**5**	**1**
Significance Threshold	*55*	*250*	*550*	*250*	*100*	*55*

Neither the original EIC project nor the revised project would result in regional emissions that would exceed National Ambient Air Quality Standards or California Ambient Air Quality Standards or contribute to existing violations but would result in a less than significant air quality impact. In addition, similar to the EIC project, the revised project would not result in a signalized intersection to operate at a Level of Service E or worse and would therefore not result in a carbon monoxide (CO) hot spot. Impacts to sensitive receptors would be less than significant. Exposure to odors would be the same as identified in the EIC MND and would be less than significant. Therefore, similar to the EIC MND, all air quality impacts would be less than significant.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

4. Biological Resources

Escondido Innovation Center MND

The EIC MND evaluated potential biological resource impacts associated with development of the 5.76-acre EIC project site. The following potentially significant biological resources impacts were identified:

- Sensitive Species: The EIC MND identified impacts to nesting raptors (i.e., Cooper's hawk) or nesting migratory birds if tree removal or construction occurs during the typical breeding season (January 1 to September 1)

- Sensitive Habitat: The EIC MND identified significant impacts to 2.17 acres of non-native grassland.

No impacts were identified to wetlands or vernal pools as none of these resources were identified on the project site. Additionally, no impact was identified to any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors or nursery sites. No conflicts with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance were identified. The EIC MND identified the following mitigation measures to reduce potentially significant impacts:

MM-BIO-1 Prior to issuance of grading permits, the following shall be identified on the grading plan:

A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of a temporal buffer.

MM-BIO-2: Prior to issuance of grading permits, the following shall be identified on the grading plan:

If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds are observed and concurrence is received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

MM-BIO-3: Prior to the issuance of grading permits, impacts to non-native grassland shall be mitigated at a ratio of 0.5:1 and shall consist of 1.09 acres. Mitigation shall be provided by either (1) preservation of equivalent or better habitat at an off-site location via a covenant of easement or other method approved by the City to preserve the habitat in perpetuity, or (2) purchase of non-native grassland or equivalent habitat credits at an approved mitigation bank, to the satisfaction of the City.

The MND concluded that implementation of these mitigation measures would ensure compliance with the City's Multiple Species Conservation Program Draft Subarea Plan and would reduce biological resource impacts to less than significant.

Revised Project

The revised project encompasses a larger project footprint than what was evaluated in the EIC MND, from 5.76 acres to 11.04 acres. The additional area included in the revised project was the subject of a previous environmental analysis associated with the VIP project (PHG 15-0042; ENV15-0017), which was approved by City Council on September 28, 2016. The VIP MND identified a number of biological resource impacts and identified mitigation to reduce biological resource impacts to less than significant. Since the approval of the VIP project, all biological resource mitigation for that project site has been satisfied and the entire area has been graded in anticipation of development. Specifically, 0.01 acre of wetland re-establishment mitigation credits were purchased at the Brook Forest Mitigation Bank and 1.28 acres of non-native grassland credits were purchased at the Daley Ranch Conservation Bank. Prior to grading of the site, a Nesting Bird Survey was conducted that concluded no nesting birds were present. Evidence of mitigation satisfaction is on record with the City. Thus, the additional area that is now part of the revised EIC project is now 100 percent disturbed from authorized grading, and the prior habitat that was present on the project site was fully mitigated prior to grading. Therefore, the environmental documents for EIC and VIP retain their relevance as the new proposed changes have been adequately analyzed for biological analysis, impacts, and mitigation requirements; and the proposed project does not raise any new issues and does not exceed the level of impacts identified in the previous EIC MND or as been previously mitigated through implementing the MMRP, as of this writing, for the VIP Project. Thus, no new or more severe impacts to biological resources would occur from the revised EIC project footprint.

The mitigation measures for biological resources identified in the EIC MND would apply to the revised project and would become conditions of the revised project approval. These mitigation measures would fully mitigate for the biological resource impacts of the revised EIC project. Thus, major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

5. Cultural Resources

Escondido Innovation Center MND

The EIC MND did not identify a significant impact to historical resources as no historical structures or features were located on the project site. A records search was completed, which identified 48 previously recorded cultural resources within a one-mile radius of the project site. None of these resources was mapped within or adjacent to the project site. No Sacred Lands were identified in the project area by Native American monitors/representatives from the San Luis Rey Band of Mission Indians and the

Kumeyaay Nation; however, two bedrock milling features were found during the archaeological survey. Archaeological testing was conducted by RECON around these milling features, and the testing concluded that the site does not represent a significant archaeological resource as defined by CEQA or the City of Escondido.

The MND determined that ground-disturbing activities, such as grading or excavation have the potential to directly or indirectly impact undiscovered subsurface archaeological resources, which would represent a significant impact. No dedicated cemetery or human remains were identified on the project site. However, in the unlikely event that remains are located on-site, such remains would be handled in accordance with procedures of the Public Resources Code Section 5097.98, the California Government Code Section 27491, and the Health and Safety Code Section 7050.5. The EIC MND included the following mitigation measure in order to ensure impacts to archeological materials would be minimized, and buried cultural resources recovered and handled properly.

MM-CUL-1: An archaeological resources monitoring program shall be implemented, which shall include the following:

1. Prior to issuance of a grading permit, the applicant shall provide written verification to the City of Escondido that a qualified archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the project archaeologist to the City. The City, prior to any preconstruction meeting, shall approve all persons involved in the monitoring program.

2. The qualified archaeologist and a Native American representative(s) shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program. Native American monitors/representatives from the Rincon Band of Luiseño Indians, the San Luis Rey Band of Mission Indians and the Kumeyaay Nation shall be invited to participate in the monitoring program.

3. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site full time to perform inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and any discoveries of prehistoric artifacts and features.

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

5. In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the project manager at the time of discovery. The archaeologist, in consultation with the project manager for the lead

agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities shall be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency, then carried out using professional archaeological methods. If any human bones are discovered, the County coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC [Native American Heritage Commission], shall be contacted in order to determine proper treatment and disposal of the remains.

6. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

7. All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation.

8. A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include Department of Parks and Recreation (DPR) Primary and Archaeological Site Forms.

With implementation of **MM-CUL-1**, the EIC MND found impacts to cultural resources would be less than significant.

In regards to paleontological resources, the EIC MND determined that the Pleistocene-age alluvium that underlies the project site has a high potential to yield scientifically significant vertebrate fossils, resulting in a potentially significant impact to unique paleontological resources should the grading disturb the alluvium. The MND included the following mitigation measure that requires a paleontological monitor be present on-site during grading activities of the Pleistocene-age alluvial deposits and to recover any fossils if found, thereby reducing this impact to a less than significant level.

MM-CUL-2 Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would

likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below.

1. A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).

2. In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.

3. A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

With implementation of **MM-CUL-2**, the EIC MND found impacts to paleontological resources would be less than significant.

Revised Project

Similar to the EIC MND, the revised project would have no impact related to historical resources due to a lack of any significant historic resources or structures within the project site. The area being added to the EIC project site with the revised project has been completely graded. Archaeological, Native American, and paleontological monitoring was completed in association with the mitigation requirements of the VIP project MND. Thus, since the area being added to the EIC project footprint has been completely disturbed associated with authorized grading, no new impacts to any unknown or buried resource would result from this additional project area. The mitigation measures identified in the EIC MND related to archaeological/Native American monitoring and paleontological monitoring would continue to apply to the revised project, which would ensure impacts to archeological materials would be minimized, and buried cultural resources recovered and handled properly.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

6. Geology and Soils

Escondido Innovation Center MND

The Preliminary Geotechnical Investigation prepared for the EIC project evaluated the general geologic and geotechnical conditions for the EIC site.

The EIC MND found that there are no known Alquist–Priolo Earthquake Fault Zones or active faults that traverse the property, and the risk of earthquake ground rupture is low. All earthwork would be conducted in accordance with the City's Grading and Erosion Control Ordinance, and the recommendations of the Preliminary Geotechnical Investigation and structures would be consistent with seismic design requirements of the California Building Code. Potential soil liquefaction risk was determined to be low due to a lack of permanent near-surface groundwater. Impacts related to landslides, soil erosion, subsidence, lateral spreading, and expansive soils were determined to be less than significant. The EIC MND concluded that that implementation of geotechnical report recommendations and conformance with the California Building Code guidelines would ensure that impacts associated with geological and soil conditions would be less than significant. Thus, no mitigation was required for the EIC MND.

Revised Project

While the revised EIC project would result in construction of a larger industrial building over an expanded project footprint, the geological conditions underlying the expanded project footprint are substantially similar to the conditions reported in the EIC MND. A Geotechnical Investigation was completed for the expanded portion of the project site associated with the environmental analysis for the VIP MND. The Geotechnical Investigation completed for the VIP MND found that all impacts related to geology and soils (seismic risk, landslides, soil erosion, subsidence, lateral spreading, and expansive soils) would be less than significant. Similar to the EIC MND, the revised project would be required to comply with the City's Grading and Erosion Control Ordinance, and California Building Code seismic design standards, and would be required to implement site-specific Geotechnical Report recommendations that would ensure impacts related to geology and soils are less than significant.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

7. Greenhouse Gas Emissions

Escondido Innovation Center MND

A site specific Greenhouse Gas Analysis was prepared for the EIC MND that determined impacts associated with Greenhouse Gas (GHG) emissions would be less than significant. As detailed in the GHG evaluation prepared for the EIC MND, the project would result in total emissions of 1,082 metric tons (MT) of carbon dioxide equivalent (CO_2E) annually. This is less than the identified 2,500 MT CO_2E screening threshold adopted by the City. As the project would not exceed the 2,500 MT CO_2E screening threshold for GHG emissions, the EIC MND found that the project would not conflict with implementation of the Climate Action Program (CAP) and would not interfere with the City's ability to achieve the GHG reduction goals outlined in the CAP, nor would it conflict with the Assembly Bill 32 mandate for reducing GHG emissions at the state level. GHG impacts of the EIC project were determined to be less than significant.

Revised Project

In order to account for the potential increase in GHG emissions associated with a larger project square footage and project footprint, a Greenhouse Gas Analysis was prepared by RECON Environmental, Inc. (Appendix D) that reflects the revised EIC project. The GHG analysis was conservative as it was based on a slightly larger building square footage (212,275 square feet analyzed versus 212,088 square feet proposed) and was based on trip generation estimates of this larger square footage. As detailed in the GHG analysis, the project site currently consists of a vacant lot and is not a significant source of GHG emissions. The report details six categories of emissions: (1) construction, (2) vehicle, (3) energy, (4) area sources, (5) water/wastewater, and (6) solid waste disposal. The following table summarizes the GHG emissions generated by the revised project. As shown in Table 3, the project would generate a total of 1,705 MT CO_2E annually.

As such, project GHG emissions would not exceed the City's 2,500 MT CO_2E screening threshold for GHG emissions and would be consistent with the applicable local and state GHG reduction regulations. While the revised EIC project would result in an increase in emissions (623 MT CO_2E) compared to the emissions reported in the EIC MND, the increase in emissions is not substantial and would be below the City's 2,500 MT CO_2E screening threshold, resulting in a less than significant impact. The estimated increase in emissions is attributed to vehicle, water use, solid waste disposal, and construction sources. However, the calculated emissions amount of 1,705 MT CO_2E for the revised project is less than the combined emission amounts for the EIC and VIP projects (which was estimated to be 1,883 MT CO_2E total annually). Similarly, the revised project would not interfere with the City's ability to achieve the GHG reduction goals outlined in the CAP nor would it conflict with the Assembly Bill 32 mandate for reducing GHG emissions at the state level. Thus, the revised EIC project would not result in a cumulatively considerable impact associated with GHG emissions.

Table 3 Project GHG Emissions (MT CO_2E per Year)	
Emission Source	Project GHG Emissions
Vehicles	1,192
Energy Use	240
Area Sources	0
Water Use	178
Solid Waste Disposal	76
Construction	19
TOTAL	**1,705**
SOURCE: Appendix D.	

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

8. Hazards and Hazardous Materials

Escondido Innovation Center MND

The EIC MND determined that impacts related to hazards and hazardous materials associated with the project would be less than significant. As detailed in the EIC MND, all project operations would be conducted in compliance with regulations, including the proper use, transport, and disposal of hazardous materials and preparation of a Hazardous Materials Business Plan. Compliance with regulations would ensure that potential hazardous material use impacts of the project would be below a level of significance. The Phase I Environmental Site Assessment (ESA) prepared for the EIC MND found that the project site is not identified on the California Department of Toxic Substances Control, Hazardous Waste, and Substances Site List compiled pursuant to Government Code Section 65962.5. No impacts related to airport hazards were identified, as there are no airports within a two mile radius of the project site. The project would not alter or impede existing evacuation route and would not impair implementation of goals and policies contained in the City's Community Protection Element of the General Plan. Wildfire impacts were determined to be less than significant, as the project would comply with City Fire Department standards and would install fire-resistive landscaping.

Revised Project

The revised EIC project would result in similar types of project operations within a larger industrial building and a larger footprint. Similar to the originally evaluated EIC project, project construction and operations would be conducted in compliance with hazardous materials regulations, including the proper use, transport, and disposal of hazardous materials and preparation of a Hazardous Materials Business Plan (if warranted) for project operations. All of the same regulatory framework would apply, and the revised project would not involve any changes that would increase the severity of a potential impact

related to hazards and hazardous materials. Regarding the expanded project footprint, a Phase I ESA prepared for the VIP MND showed that the land within the expanded project footprint is included in the Hazardous Waste Information System (HAZNET) database. According to the database, unspecified organic liquid mixture, waste oil, and mixed oil, organic solids, and latex waste were generated in 2004 and were most likely associated with a former painting company that operated on-site. However, the potential for localized areas of contamination was determined to be a *de minimis* condition, which would not represent a hazard to humans or the environment. Thus, development of an industrial building over the expanded project footprint would result in a less than significant impact related to hazardous materials and contamination.

The City of Escondido General Plan Figure VI-6 illustrates the wildfire risk within the City. As shown on that map, the site is identified as having a high wildland fire risk. The area around the project is mostly developed and consists of industrial to the northwest and west, residential to the northeast and east, and the undeveloped Escondido Creek drainage along the southeastern edge of the project. The entire site would be graded and would comply with Fire Code regulations. Additionally, landscaping would comply with City of Escondido Fire Department standards for planting in the high fire severity zone. The revised project would therefore result in a less than significant impact associated with the increased exposure of people or structures to a wildfire risk. Thus, as with the EIC MND, the project would have a less than significant impact related to wildfire hazards.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

9. Hydrology and Water Quality

Escondido Innovation Center MND

The EIC MND determined that impacts associated with hydrology and water quality were less than significant. The Storm Water Quality Management Plan (SWQMP) and Preliminary Drainage Study prepared for the EIC project identified two drainage basins existing on-site, with one basin draining via sheet flow to the northeast edge of the site, and the second basin draining via sheet flow to the south onto the adjacent property. The project proposed a bio-retention basin and a bio-filtration basin into the design of the project in order to detain and treat storm water runoff before being discharged into Escondido Creek, which is an impaired water body as listed on the Clean Water Section 303(d) list. The MND also identified that the project would incorporate source control, site design, and structural best management practices (BMPs), as well as construction and post-construction BMPs. Implementation of these BMPs, along with regulatory compliance, would preclude any violations of applicable standards and discharge regulations. In addition, the project site would be designed to raise the surface elevation of the site to provide for a graded first-floor elevation of approximately 624 feet amsl in order to reduce the potential for on-site flooding in the event of overtopping or failure of the levee system

associated with Escondido Creek. Project impacts related to hydrology and water quality were found to be less than significant.

Revised Project

Similar to the EIC project, the project would be required to comply with applicable hydrology, hydromodification, and water quality regulations, including all current storm water regulations. In order to address updated drainage and storm water management for the revised project design and expanded project footprint, a Drainage Study and Storm Water Quality Management Plan were completed for the revised project footprint (Appendices E and F, respectively). The results of these reports are summarized below.

Hydrology

The existing drainage pattern for the expanded project site sheet flows southerly and ultimately drains onto Escondido Creek. The site slopes gently from north to southwesterly at an average 2 percent slope. In the existing condition, two drainage basins exist on-site. Runoff concentrates at a southerly corner of the site before draining into Escondido Creek. The remainder of the site runoff concentrates at the northeast edge of the site draining onto Harmony Grove Road. Off-site runoff is not expected to change as a result of project implementation.

The proposed drainage conditions include three drainage basins with a gentle slope to the north, southeast, and southwest. Drainage basin 1 would drain northeasterly via rooftop gutter and parking lot curb and gutter onto a proposed bio-filtration basin located in the northeast corner of the site. Drainage basin 2 would drain easterly via rooftop gutter and parking lot curb and gutter, and a storm drain system into a proposed bio-filtration basin located in the southeast corner of the site. Drainage basin 3 would drain southwesterly via rooftop gutter and parking lot curb and gutter onto a proposed bio-filtration basin located in the northwest corner of the site. Once treated, the on-site drainage basins would drain onto Escondido Creek via the proposed storm drain system. The off-site runoff from northeast of the project site would bypass the site through a proposed storm drain system that also conveys runoff from basin 1 that ultimately would drain into Escondido Creek.

Runoff is expected to increase by 22.0 cubic feet per second (cfs) due to the addition of impervious surfaces to the project site. Table 4 summarizes the rate of runoff flow in the existing and proposed conditions.

Table 4
Runoff Rates

Basin	Area (acres) Pre-Project	Q_{50} (cfs) Pre-Project	Area (acres) Post-Project	Q_{50} (cfs) Post-Project
1	0.89	1.0	3.8	12.0
2	10.0	11.2	4.1	12.9
3	-	-	2.9	9.2
Total	**10.9**	**12.2**	**10.9**	**34.2**

SOURCE: Appendix E.

However, with the installation of proposed detention basins, runoff will be retained within biofiltration basins and the overall peak flow rate of water exiting the site would be reduced to below pre-project conditions. The overall peak flow rate of water leaving the site is summarized in Table 5. With implementation of the biofiltration basins, impacts to hydrology would be less than significant.

Table 5
Runoff Rates

Point of Connection	Q_{50} – Pre-Project (cfs)	Q_{50} – Post-Project (without bio-filtration) (cfs)	Q_{50} – Post-Project (with bio-filtration and retention) (cfs)
1	12.2	34.2	1.45
SOURCE: Appendix E.			

Similar to the EIC, the project site would be designed to raise the surface elevation of the site to provide for a finished floor elevation of approximately 624 feet amsl in order to reduce the potential for on-site flooding in the event of overtopping or failure of the levee system associated with Escondido Creek. Similar to the EIC MND, the revised project impacts related to hydrology and flooding would be less than significant.

Water Quality

According to the SWQMP prepared for the revised project, the project site is located within the Carlsbad 904 Hydrologic Unit. Downstream receiving waters include Escondido Creek and the San Elijo Lagoon, which empties into the Pacific Ocean. Escondido Creek is a Clean Water Act Section 303(d) listed water body that is impaired for benthic community effects, bifenthrin, DDT, indicator bacteria, malathion, manganese, nitrogen, phosphate, selenium, sulfates, total dissolved solids, and toxicity. The San Elijo Lagoon is a 303(d) listed water body that is impaired by eutrophic, indicator bacteria, sedimentation/siltation, and toxicity. The Pacific Ocean is a 303(d) listed water body impaired by trash. Best Management Practices have been incorporated into the project design to reduce pollutants to receiving waters from the project site as follows:

Source Control BMPs:

- Prevention of illicit discharges into the MS4 by directing irrigation water away from impervious surfaces
- Storm drain stenciling and signage
- Protecting trash storage areas from rainfall, run-on, runoff, and wind dispersal by locating trash containers in a roofed, walled enclosure, and away from storm drains

Site Design BMPs:

- Minimize impervious area by installing parking and driveway aisles to minimum required widths
- Minimize soil compaction by avoiding compaction in planned landscaped areas and till and amend soil for improved infiltration capacity
- Runoff collection
- Landscaping with native or drought-tolerant species

Structural BMPs:

- Bio-filtration basins

With adherence to existing regulations and implementation of BMPs identified in the SWQMP, project water quality impacts would be less than significant. Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

10. Land Use Planning

Escondido Innovation Center MND

The EIC MND found that construction of an industrial development would not create any new land use barriers, preclude the development of surrounding parcels, or otherwise divide or disrupt the physical arrangement of the surrounding established community, and that no impact would occur with respect to physically dividing an established community. In addition, the MND found that the project would be consistent with the General Plan land use designation of Light Industrial (LI). The original EIC project required a zone change from single-family residential to Planned Development-Industrial (PD-I). Overall, the MND found the project would be consistent with applicable land use plans, policies, or regulations. Conflicts with the applicable habitat conservation plan or natural community plan were reduced to less than significant through application of the biological resources mitigation measures (**MM-BIO-1, MM-BIO-2,** and **MM-BIO-3)**.

Revised Project

Similar to the EIC project, the revised project would not create any new land use barriers, preclude the development of surrounding parcels, or otherwise divide or disrupt the physical arrangement of the surrounding established community, as the areas surrounding the project site are mostly developed and consist of industrial and residential uses to the north and northwest; industrial development to the west; residential uses to the northeast and east; and currently undeveloped lands (Escondido Creek) along the eastern boundary and to the immediate south.

The entire project site (including the new project area being added) is designated in the Escondido General Plan as Light Industrial (LI) and is zoned as Planned Development-Industrial (PD-I)· The project would be consistent with the General Plan industrial land use goal of providing "a variety of industrial uses located and designed to assure compatibility with adjoining land uses offering diverse jobs for the community." Similar to the EIC MND, conflicts with the applicable habitat conservation plan or natural community plan would be reduced to less than significant through application of the biological resources mitigation measures (MM-BIO-1, MM-BIO-2, and MM-BIO-3) identified in the EIC MND.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

11. Mineral Resources

Escondido Innovation Center MND

The EIC MND concluded that no impacts to mineral resources would occur, as it would not be feasible to use the site for mining operations due to the site's zoning and land use designation, the location of the site adjacent to residential and industrial uses, and the relatively small property size. In addition, the City's General Plan does not identify the project site as an existing or former extraction site, and the site is underlain by undocumented fill, unmapped topsoil, alluvium, and gabbroic rock. No impacts to mineral resources were identified in the EIC MND.

Revised Project

The underlying geologic conditions on the project site have not substantially changed from what was previously analyzed in the EIC MND. Similar to the EIC MND, it would not be feasible to use the expanded project site for mining operations due to the site's zoning and land use designation, the location of the site adjacent to residential and light industrial uses, and the site's size. The City's General Plan does not identify the project site as an existing or past extraction site. Thus, similar to the EIC MND, implementation of the proposed project would result in no impact related to the loss of a local, regional, or state mineral resource.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

12. Noise

Escondido Innovation Center MND

The Noise Analysis prepared for the EIC MND identified that the project would have a less than significant impact related to noise. As detailed in the EIC MND, the project would have the potential to result in a temporary increase in noise during construction activities; however, this temporary noise level increase would not exceed the 75 average equivalent A-weighted decibels (dB(A) L_{eq}) for surrounding sensitive receptors, resulting in a less than significant impact. An increase in traffic noise due to project implementation was estimated to result in a less than 1 dB increase in noise level over the existing conditions, resulting in a less than significant impact. Operational noise impacts were determined to be less than significant, as the operational noise levels during daytime and nighttime hours were estimated to be less than the Noise Ordinance limit of 70 dB(A) L_{eq} for light industrial uses.

Additionally, noise levels would not exceed 45 dB(A) L_{eq} and would be less than the Noise Ordinance limit of 50 dB(A) for residential uses. The EIC MND also identified less than significant impacts related to vibration, ambient noise level increases, and airport noise.

It was not known at the time of the MND analysis what the permitted industrial uses would be for the EIC Project; however, it was anticipated that uses could include business offices, wholesalers, day care, and warehousing. Regardless, the primary noise sources on-site would be rooftop heating, ventilating and air conditioning (HVAC) equipment, and the loading dock. Since on-site operational noise is affected by the proposed configuration of buildings and the location of proposed loading docks, on-site operation noise impacts were calculated for both project Option A and Option B, as described below.

- HVAC Equipment – for both project options, the HVAC equipment would be shielded from view by building parapets that extend 6 inches above the top of the mechanical equipment.

- Loading Dock – Under Option A, the loading dock would be located at the southern side of the building near the southern property line. Under Option B, the loading dock would be located at the eastern side of Building C near the eastern project boundary. The on-site maneuvering associated with the delivery trucks for both options consists of the truck entering the site and traveling toward and backing into the loading dock. The analysis assumed that deliveries would occur during daytime and nighttime hours.

Revised Project

Based on the revised project design including the larger structure and expanded project footprint, an updated Noise Analysis was completed for the revised EIC project (Appendix G). The results of the noise analysis The results of the Noise Analysis for the revised EIC project are summarized below.

Construction Noise

Project construction would result in noise associated with the grading, building, and paving of the project, resulting in potential short-term noise impacts to surrounding properties. There are residential properties to the north, south, and east of the project site, and noise modeling for the construction phase of the project was conducted at 16 receiver locations within the adjacent residential areas. Based on the noise modeling, construction noise levels would range from 56 to 71 dB(A) at the nearest residential uses. While construction activity would lead to an overall increase in ambient noise levels within the project vicinity, the exposure would be temporary and would not exceed the City's threshold of 75 dB(A) L_{eq} at the nearest residential property. In addition, construction activities would generally occur over a time period from 7:00 am to 5:00 pm on weekdays, and would therefore comply with the City Municipal Code Sections 17-234 and 12-238. Therefore, temporary increases in noise levels from construction activities would be less than significant.

Traffic Noise

The revised EIC project would increase traffic volumes on local roadways. However, the project would not substantially alter the vehicle classifications mix on local or regional roadways nor would the project alter the speed on an existing roadway or create a new roadway. As a result, the primary factor affecting off-site noise levels would be increased traffic volumes.

Based on the City's significance standards, noise increases that do not result in increases in excess of General Plan standards are not considered significant, and noise increases that result in a 3 dB(A) or less incremental increase in noise beyond the General Plan's noise standards are not considered significant. Traffic noise calculations were modeled within roadways closest to the project site, as these locations would represent the greatest concentration of project-related traffic. Table 6 summaries the traffic noise level increases due to the project, the cumulative noise increase in the future, and the project's contribution to any cumulative increases in traffic noise.

Table 6
Traffic Noise Impacts - CNEL at 50 Feet

Roadway and Segment	Existing	Existing Plus Project	Increase	Cumulative	Cumulative Plus Project	Cumulative Increase	Project Contribution to Cumulative Increase
Harmony Grove Road							
West of Enterprise Street	65	66	<1	69	69	3	<1
Enterprise Street to Hale Avenue	67	68	<1	69	70	2	<1
Hale Avenue							
Harmony Grove Road to 9th Avenue	66	66	<1	67	67	2	<1
Enterprise Street							
Andreasen Drive to Harmony Grove Road	64	65	<1	66	66	2	<1

NOTE: Differences may vary due to independent rounding.
SOURCE: Appendix G.

As shown in Table 6, the project would result in a less than 1 dB increase in traffic noise over the existing conditions along affected roadway segments for both the existing plus project and cumulative plus project conditions. As such, the project would result in less than significant direct and cumulative impacts to traffic noise.

On-Site Noise

The project's primary on-site noise-generating sources would be HVAC equipment and noise at loading docks. The revised project anticipates two roof-mounted HVAC units and one roof-mounted Air Handling Unit (AHU), which is much fewer than the number of HVAC/AHU units proposed as part of the original EIC Project. The reduced amount of HVAC capacity with the revised project is based on varying space occupancies, building utilization, and desired ventilation rates in accordance with occupancy patterns. The occupancy of the revised project is primarily warehousing and distribution (with intermittent occupancy), which has different temperature needs than office uses where use

space is regularly occupied and there is a higher demand for temperature control. Similar to the project design associated with the EIC MND, the HVAC equipment would be shielded from view by building parapets that extend 6 inches above the top of the mechanical equipment. In order to limit truck idling noise at loading docks, signage would be installed at truck docks providing notice that engines must be turned off during loading and unloading (as shown on project plans). Two additional project design revisions would further reduce truck noise at adjacent property lines. First, an outdoor employee seating area is proposed north of the truck docks that would be screened by two solid 60-foot-long, 12-foot-tall screen walls. Additionally, based on a request by the adjacent property owners to increase the height of the wall at the northern end of the project site (refer to Appendix B), the project design now includes an 8-foot-tall wall which would further attenuate noise from the project operations.

Operational noise levels for the project were modeled at 26 receiver locations along the project's boundary line. Based on the noise modelling completed for the project, daytime on-site generated noise levels would range from 26 to 45 dB(A) L_{eq} at the residential property lines and 37 to 59 dB(A) L_{eq} at the industrial property lines. Nighttime noise levels would range from 25 to 42 dB(A) L_{eq} at the residential property lines and 37 to 59 dB(A) L_{eq} at the industrial property lines. As such, the on-site day/nighttime noise levels would not exceed the City's Noise Ordinance limits of 50/45 dB(A) for residential and 70/70 dB(A) for the industrial at the property lines, resulting in a less than significant impact.

Similar to the EIC MND, noise levels associated with the project would not conflict with the City's Noise Ordinance or the General Plan noise standards, resulting in a less than significant impact. Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

13. Population and Housing

Escondido Innovation Center MND

The EIC MND identified no impacts related to population and housing. The project would not displace any existing housing units or people, as there are no housing units located on-site.

Revised Project

Similar to the EIC project, the proposed project would not displace any existing housing units or people, as there are no housing units located within the expanded site footprint. Therefore, similar to the EIC MND, the proposed project would have no impact in regards to population and housing. Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring

major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

14. Public Services

Escondido Innovation Center MND

The EIC MND identified less than significant impacts related to public services. The EIC MND found that any increase in demand for fire, police, parks, and other facilities would be offset by the payment of Public Facilities Fees. The EIC MND found that no impacts to schools would occur, as the project would not result in an increase in student enrollment.

Revised Project

The revised EIC project would construct a larger industrial building over a larger project footprint; however, the proposed industrial land use would remain the same. Similar to the EIC MND, the proposed project would offset any impacts to public services by the payment of Public Facilities Fees, and the project would not generate any new student enrollment. Thus, the proposed project would have a less than significant impact related to public services.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

15. Recreation

Escondido Innovation Center MND

The EIC MND did not identify any impacts related to recreational resources, because the project did not include any recreational facilities or require the construction or expansion of any recreational facilities, as the project would not increase demand for these facilities.

Revised Project

The project does not propose any recreational facilities, and the proposed industrial building would not generate a new population base that would warrant the need for additional recreational facilities. Thus, similar to the EIC MND, the project would not result in any significant environmental impacts related to the construction or expansion of recreational facilities. Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

16. Transportation/Traffic

Escondido Innovation Center MND

A Traffic Impact Analysis was prepared for the EIC project, and the results are documented in the EIC MND. As detailed in the EIC MND, the worst-case project (Option A) would generate 788 average daily trips (ADT), with a total of 87 trips during the AM peak hour and 95 trips during the PM peak hour. Impacts at street segments and intersections were analyzed consistent with the City's Significance Determination Thresholds. The City used the San Diego Traffic Engineer's Council and the San Diego Chapter of the Institute of Transportation Engineers (SANTEC/ITE) guidelines in determining levels of significance. Based on the SANTEC/ITE guidelines, a Level of Service (LOS) D, E, or F is considered an unacceptable operation. The MND identified four traffic and circulation impacts associated with the project: (1) Direct and cumulative impact at the Harmony Grove/Hale Avenue intersection; (2) Cumulative impact along Harmony Grove Road from Project Access A to Enterprise Street; (3) Cumulative impact along Harmony Grove Road from Enterprise Street to Hale Avenue; and (4) Direct and cumulative impact along Hale Avenue from Harmony Grove Road to 9th Avenue.

The EIC MND MMRP identified four project impacts and three mitigation measures that would reduce traffic impacts to less than significant, as shown in Table 7:

Table 7
EIC Transportation Impacts and Mitigation Measures

Direct and cumulative impact at the Harmony Grove/ Hale Avenue intersection	**MM-TRA-1**: Prior to the issuance of occupancy permits, restripe the approach on Hale Avenue within the existing 22-foot southbound lane to provide one dedicated right-turn lane (12 feet wide) and one through lane (10 feet wide) extending 125 feet from the stop bar. The TIA for the EIC MND shows the conceptual Harmony Grove Road improvements.
Cumulative impact along Harmony Grove Road from Project Access A to Enterprise Street	**MM-TRA-2**: Prior to the issuance of occupancy permits, widen Harmony Grove Road within the existing right-of-way along the project frontage to Enterprise Street to provide a two-way left-turn lane serving as a refuge for left-turning vehicles in and out of the project site and nearby industrial driveways, thus allowing for improved flow for through traffic along Harmony Grove Road. From the project driveway to Enterprise Street (a length of approximately 415 feet), widen Harmony Grove Road extending north along the project frontage to provide a 13- to 18-foot northbound lane and an 11-foot two-way left-turn lane for a total paved width varying between 38 and 54 feet.
Cumulative impact along Harmony Grove Road from Enterprise Street to Hale Avenue	**MM-TRA-3:** Prior to the issuance of occupancy permits, the applicant shall pay a fair share toward the Citracado Parkway Extension Project to improve and redirect the flow of traffic along this roadway.
Direct and cumulative impact along Hale Avenue from Harmony Grove Road to 9th Avenue	**MM-TRA-1** and **MM-TRA-3** would reduce the direct and cumulative impact to less than significant.

No other significant impacts were identified related to air traffic patterns, design features, emergency access or conflicts with policies plans or programs affecting public transit, bicycle, or pedestrian facilities. The project would retain the existing sidewalks along Harmony Grove Road and would not alter any public transit or the Class III bicycle facilities as proposed in the City of Escondido Bicycle Facilities Master Plan.

Revised Project

Due to the additional square footage associated with the revised EIC project, a trip generation analysis was prepared for the revised project and is included as Appendix H. This analysis evaluated potential impacts associated with the revised project to determine if the revised project would result in any new or more severe impacts in comparison to the impacts identified in the EIC MND. As detailed above, the EIC MND reported 788 ADT from the 98,500 square feet of industrial/business park space. The revised EIC project is designed to be used as a warehouse use, and thus the warehouse trip generation rates were used to develop trip generation for the revised project. While the overall footprint of the currently proposed warehouse project is larger, the trip generation rate per 1,000 square feet for the warehouse land use is lower than that studied in the EIC MND (8 ADT/1,000 square feet for industrial/business park, vs. 5 ADT/1,000 square feet for warehouse).

Based on the warehouse trip generation rate, the revised EIC project is anticipated to generate 1,061 ADT, resulting in an increase of 273 ADT compared to the original EIC trip generation. AM/PM peak hour traffic trips for the proposed project would be 138/159, resulting in an increase of 51/64 AM/PM peak hour trips over those anticipated for the EIC MND. Table 8 below summarizes the results of the trip generation rate analysis.

Table 8
Existing and Existing With Project for Street Segments

		Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
					In:Out	Volume				In:Out	Volume		
Land Use	Size	Rate	Volume	% of ADT	Split	In	Out	Total	% of ADT	Split	In	Out	Total
Proposed	212,275[1]	5/1,000 sf	1,061	13%	7:3	97	41	138	15%	4:6	64	95	159
EIC MND	98,500	8/1,000 sf	788	11%	9:1	78	9	87	12%	2:8	19	76	95
Difference	113,775	-	273	-	-	19	32	51	-	-	45	19	64

SOURCE: Appendix H.
sf = square feet
[1]A slightly higher square footage was analyzed in the traffic report that which would provide a conservative analysis compared to the 275,088 sf proposed by the current project design.

Based on these estimated trip generation rates, a relatively nominal increase in terms of traffic volume generation would be expected from the revised EIC project over what was analyzed and anticipated in the EIC MND. The four traffic impacts identified in the EIC MND would continue to occur, and the mitigation measures identified in the EIC MND would be applied to the revised project.

In addition to the standard trip generation analysis detailed above, an additional trip generation analysis was completed for the project that uses a passenger car equivalent (PCE) factor to account for truck intensive uses that are typically associated with warehouse operations. This analysis essentially increases the number of trips by a certain factor to account for the negative effects of heavy vehicles in the LOS analyses. A factor between 2.0 and 4.0 is typically applied to some or all of a land use's trip generation to account for heavy vehicles. The inclusion of a 3.0 PCE factor was applied to the project's trip generation rates.

In order to determine how much of the project's 1,061 ADT could be increased with the PCE before an impact were to occur, LLG conducted a "reserve capacity" analysis of the street system to determine when the LOS C-operating locations would first degrade to LOS D. The project's revised driveway configuration was assumed for the analysis. The most sensitive location was the Harmony Grove Road/ Project Access "B" intersection, located on the northeastern side of the site. Thus, a reserve capacity analysis was completed for this intersection to determine what amount of additional ADT could be generated before a significant impact would result.

The reserve capacity analysis showed that a project contribution of 2,500 ADT could occur before the Harmony Grove Road/Driveway "A" intersection degraded to LOS D, resulting in a significant impact. As the project would generate 1,061 ADT (non-PCE), an additional 1,439 ADT of trips could be generated without resulting in a significant impact to the Harmony Grove Road/ Driveway "A" intersection. Using a conservative PCE factor of 3.0, the 1,439 ADT of available "reserve driveway non-PCE ADT" would amount to 480 PCE adjusted ADT (1,439 reserve ADT ÷ 3.0 PCE = 480 ADT w/PCE). This means that up to 45 percent of the vehicles entering and exiting the site could be trucks (480 PCE-adjusted ADT ÷ 1,061 total driveway = 45 percent) without resulting in a significant impact. Actual truck volume is expected to be much lower, as national trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual cite truck-traffic operations related to warehouse uses at approximately 20 percent of trips.

It should also be noted that while the Citracado Parkway Extension was not assumed in this analysis, the EIC MND mitigation measures included a fair share contribution to this improvement, and the improvement would ultimately improve traffic operations at this intersection. The Harmony Grove Road/Driveway "A" intersection, which was the focus of the reserve analysis, has the least available capacity to add trips among all of the EIC MND impacts identified. Thus, as demonstrated above, the additional trips generated by the revised project would not result in any additional impacts to the Harmony Grove Road/Driveway "A" intersection, nor any of the other segment/intersection impacts identified in the EIC MND. Details of the reserve capacity analysis are included as Appendix H.

The additional traffic generated by the revised project would not reduce LOS to substandard levels, and no additional impact to segments or intersections would occur with the implementation of the project. Transportation impacts associated with the project revisions would be the same as those identified in the EIC MND, and all EIC MND

mitigation measures (MM-TRA-1 to MM-TRA-3) would continue to apply to the revised project, reducing all impacts to less than significant. Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

17. Tribal Cultural Resources

Escondido Innovation Center MND

Tribal consultation for the EIC MND was initiated on August 22, 2016 by the City of Escondido. The Rincon Band of Luiseño Indians responded to the tribal consultation letter indicating the project site is within the historic Luiseño Territory and within Rincon's specific area of cultural interest and recommended that a Luiseño Tribal Monitor be present for all ground-disturbing activities. Although there are no known tribal cultural resources on-site, the potential discovery of tribal cultural resources during grading was identified as a potentially significant impact in the EIC MND. Thus, Native American monitoring during grading activities was included as a project mitigation measure (see MM-CUL-1). This mitigation measure includes the requirement of monitors/ representatives from the Rincon Band of Luiseño Indians to be invited to participate in the monitoring program in addition to the San Luis Rey Band of Mission Indians and the Kumeyaay Nation who participated in initial archaeological survey and testing program. In addition, the tribes requested inclusion of the following mitigation measures to reduce potentially significant impacts to tribal cultural resources to less than significant:

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

MM-TCR-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.

Revised Project

The revised EIC project includes development within a larger project footprint. However, the expanded project footprint was already graded in anticipation of industrial development and Native American monitoring was completed for all project grading within the expanded, project footprint consistent with the mitigation requirements for the VIP MND. All mitigation measures identified in the EIC MND (referenced above) would continue to apply to the revised EIC project, and no other project changes were identified that would result in any new or more severe impacts to tribal cultural resources.

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

18. Utilities and Service Systems

Escondido Innovation Center MND

The EIC MND found that the project would result in a less than significant impact related to utilities, including natural gas, communication systems, water, sewer, storm water drainage, and solid waste disposal. All project wastewater would be treated to the applicable water quality standards in the nearby wastewater treatment plant, and no wastewater facility improvements would be necessary to serve the EIC project. Existing water and wastewater facilities were found to be adequate to serve the EIC project. The EIC MND found that storm water facilities in the surrounding area would be adequate to serve the project site. Water would be adequate to supply the proposed use based on the consistency of the proposed land use with the City's General Plan and consideration of the site's water supply needs in water supply planning documents.

The EIC project would connect to existing wastewater infrastructure and wastewater generation was not anticipated to exceed current City wastewater capacity. In addition, the MND stated that the EIC project would minimize construction waste by recycling construction and demolition waste where possible. Operational waste would be collected by the Escondido Disposal, Inc. and disposed of at regional landfills. The MND found that the EIC project would not result in a need for new or expanded solid waste facilities off-site.

Revised Project

Similar to the EIC MND conclusions, the project would not result in significant utilities-related impacts. The project would include all necessary improvements to provide utility service to the project, and the environmental impacts of such improvements are considered in this addendum. Water and sewer connections would be required and would occur either on-site or within adjacent streets. Regarding water supply, the project land use would be consistent with that allowed by the General Plan and, thus, the anticipated water use based on the planned industrial land use was considered in water supply planning documents.

Similar to the original EIC project, the revised project would also involve demolition and construction that would generate solid waste that would be disposed of at regional landfills, green waste centers, and recycling centers, as appropriate. Operational waste would be collected by Escondido Disposal, Inc. and be disposed of at regional landfills. The project would not result in a need for new or expanded solid waste facilities off-site. Thus, project impacts related to solid waste would be less than significant

Major revisions to the EIC MND are not required due to changes to the project; there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EIC MND.

19. Mandatory Findings of Significance

Escondido Innovation Center MND

The project was found to result in potentially significant impacts related to biological resources, cultural resources, tribal cultural and paleontological resources, land use, and transportation/traffic. As previously described, all of these impacts were reduced to below a level of significance with implementation of mitigation measures **MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-CUL-1, MM-CUL-2, MM-TCR-1 through MM-TCR-10, and MM-TRA-1, MM-TRA-2, and MM-TRA-3.**

All other project impacts were found to be less than significant without mitigation, and no deficiencies related to the City's General Plan Quality of Life Standards were found to occur. The project would not result in environmental effects that would cause a substantial adverse effect on human beings either directly or indirectly.

Revised Project

Similar to the EIC project, the project would result in potentially significant impacts to biological resources, cultural and paleontological resources, tribal cultural resources, and traffic/transportation. However, all of these impacts would be reduced to less than significant through implementation of the EIC MND mitigation measures **MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-CUL-1, MM-CUL-2, MM-TCR-1 through MM-TCR-10, and**

MM-TRA-1, MM-TRA-2, and MM-TRA-3. No additional impacts were identified as a result of the revised project, and no deficiencies were identified related to the City's General Plan Quality of Life Standards as a result of the EIC project revisions.

G. Material Used in Preparation of this Analysis

Appendices

A. Final Initial Study/Mitigated Declaration for Planned Development and Zone Change for Escondido Innovation Center Project, RECON Environmental Inc., December 2016.
B. Correspondence from Property Owners
C. Air Quality Analysis for the Harmony Grove Industrial Project, RECON Environmental, August 28, 2017
D. Greenhouse Gas Analysis for the Harmony Grove Industrial Project, RECON Environmental, August 28, 2017
E. Final Engineering Drainage Study for 1925, 2005 Harmony Grove Road, Escondido, CA, Masson & Associates, Inc., September 5, 2017
F. City of Escondido Priority Development Project Storm Water Quality Management Plan, Masson & Associates, Inc., November 9, 2017
G. Noise Analysis for the Harmony Grove Industrial Project, RECON Environmental, September 19, 2017
H. Victory Industrial Park/Escondido Innovation Center: Warehouse Proposal, Linscott, Law, & Greenspan, September 22, 2017

Figures

Figure 1: EIC MND Project Boundary
Figure 2: EIC MND Site Plan (Option A)
Figure 3: Revised EIC Project Boundary
Figure 4: Revised EIC Site Plan
Figure 5: Landscape Plan
Figure 6: North-South Elevations
Figure 7: West Elevations
Figure 8: East Elevations
Figure 9a: Project Renderings
Figure 9b: Project Renderings
Figure 9c: Project Renderings

MITIGATION AND MONITORING PROGRAM

PROJECT NAME: Escondido Innovation Center, Escondido, CA 92025

PROJECT DESCRIPTION: The project is a revision to the approved Escondido Innovation Center project. The revised project involves development of a 212,088-square-foot industrial building over 11.04 acres. Three detention basins would be installed on the project site, located at each of the three corners of the site. The main access to the project site would be from the west side of the project site, approximately 550 feet south of Enterprise Street. A secondary project access driveway would be provided at the north end of the project site along Harmony Grove Road. Surface parking would be provided on the project site, surrounding the industrial building. Fire and emergency access drives would be provided around the perimeter of the building. Parking for 220 vehicles (including eight accessible stalls) and 14 trailer truck stalls would be provided on-site. While the revisions to the original EIC project would result in a larger industrial building over an expanded project footprint, the MND addendum demonstrates that the following mitigation measures, as identified in the original EIC MND, are adequate to reduce impacts to less than significant.

APPROVAL BODY/DATE: The original EIC MND and mitigation measures detailed below were approved by City Council on January 11, 2017. These mitigation measures will continue to apply to the revised EIC project and would reduce all potentially significant impacts to less than significant.

CONTACT: Mike Strong, Assistant Planning Director

PHONE NUMBER: 760-839-4556

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Potential impact to raptors protected by the California Department of Fish and Wildlife, and potential impact to nesting birds protected by the Migratory Bird Treaty Act	**MM-BIO-1:** Prior to issuance of grading permits, the following shall be identified on the grading plan: A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of a temporal buffer.	Applicant		
	MM-BIO-2: Prior to issuance of grading permits, the following shall be identified on the grading plan: If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Impact to 2.17 acres of non-native grassland	**MM-BIO-3:** Prior to the issuance of grading permits, impacts to non-native grassland shall be mitigated at a ratio of 0.5:1 and shall consist of 1.09 acres. Mitigation shall be provided by either (1) preservation of equivalent or better habitat at an off-site location via a covenant of easement or other method approved by the City to preserve the habitat in perpetuity, or (2) purchase of non-native grassland or equivalent habitat credits at an approved mitigation bank, to the satisfaction of the City.	Applicant		
Potential impact to unknown subsurface archaeological resources	**MM-CUL-1:** An archaeological resources monitoring program shall be implemented, which shall include the following: 1. Prior to issuance of a grading permit, the applicant shall provide written verification to the City of Escondido that a qualified archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the project archaeologist to the City. The City, prior to any preconstruction meeting, shall approve all persons involved in the monitoring program. 2. The qualified archaeologist and a Native American representative shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program. Native American monitors/representatives from the Rincon Band of Luiseño Indians, the San Luis Rey Band of Mission Indians and the Kumeyaay Nation shall be invited to participate in the monitoring program. 3. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site full-time to perform inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and any discoveries of prehistoric artifacts and features.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Potential impact to unknown subsurface archaeological resources (cont.)	4. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. 5. In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the project manager at the time of discovery. The archaeologist, in consultation with the project manager for the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency, then carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. 6. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.			

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Potential impact to unknown subsurface archaeological resources (cont.)	7. All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation 8. A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include Department of Parks and Recreation (DPR) Primary and Archaeological Site Forms.			
Potential impact to unknown subsurface paleontological resources	**MM-CUL-2:** Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below. 1. A qualified paleontologist or a paleontological monitor shall be on site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Potential impact to unknown subsurface paleontological resources (cont.)	2. In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense. 3. A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.			
Direct and cumulative impact at the Harmony Grove/ Hale Avenue intersection	**MM-TRA-1**: Prior to the issuance of occupancy permits, restripe the approach on Hale Avenue within the existing 22-foot southbound lane to provide one dedicated right-turn lane (12 feet wide) and one through lane (10 feet wide) extending 125 feet from the stop bar. The TIA for the EIC MND shows the conceptual Harmony Grove Road improvements.	Applicant		
Cumulative impact along Harmony Grove Road from Project Access A to Enterprise Street	**MM-TRA-2**: Prior to the issuance of occupancy permits, widen Harmony Grove Road within the existing right-of-way along the project frontage to Enterprise Street to provide a two-way left-turn lane serving as a refuge for left-turning vehicles in and out of the project site and nearby industrial driveways, thus allowing for improved flow for through traffic along Harmony Grove Road. From the project driveway to Enterprise Street (a length of approximately 415 feet), widen Harmony Grove Road extending north along the project frontage to provide a 13- to 18-foot northbound lane and an 11-foot two-way left-turn lane for a total paved width varying between 38 and 54 feet.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Cumulative impact along Harmony Grove Road from Enterprise Street to Hale Avenue	**MM-TRA-3:** Prior to the issuance of occupancy permits, the applicant shall pay a fair share toward the Citracado Parkway Extension Project to improve and redirect the flow of traffic along this roadway.	Applicant		
Direct and cumulative impact along Hale Avenue from Harmony Grove Road to 9th Avenue	**MM-TRA-1** and **MM-TRA-3** would reduce the direct and cumulative impact to less than significant.	Applicant		
Potential impact to any significant unknown tribal cultural resources	**MM-TCR-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.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	MM-TCR-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.	Applicant		
	MM-TCR-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.	Applicant		
	MM-TCR 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.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	MM-TCR-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.	Applicant		
	MM-TCR-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.	Applicant		
	MM-TCR-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	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	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.			
	MM-TCR-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.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	MM-TCR-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.	Applicant		
	MM-TCR-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.	Applicant		