Final

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
California Environmental Quality Act (CEQA)

2608 SOUTH ESCONDIDO BOULEVARD PROJECT

Project Case # ENV 19-0007, SUB 19-0010 and PHG19-0050
Address: 2608 South Escondido Boulevard
Escondido, CA 92025
Assessor Parcel Numbers 238-152-06-00 and 238-152-07-00

Prepared for:

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025

Prepared by:

RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108

July 2020

CITY OF ESCONDIDO
PLANNING DIVISION
201 NORTH BROADWAY
ESCONDIDO, CA 92025-2798
(760) 839-4671

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

CASE NOs.: ENV 19-0007; SUB 19-0010 and PHG 19-0050 "2608 S. Escondido Boulevard Project"

DATE ISSUED: March 12, 2020

PUBLIC REVIEW PERIOD: March 16, 2020 – April 6, 2020

LOCATION: On the eastern side of S. Escondido Boulevard, south of Citracado Parkway, east of S. Centre City Parkway, addressed as 2608 S. Escondido Boulevard (Assessor Parcel Nos. 238-152-06-00, 238-152-07-00).

PROJECT DESCRIPTION: The project involves a one-lot Tentative Subdivision Map along with a Condominium Permit/Plot Plan for the proposed development of 42 air-space, three-story condominium units located on approximately 1.75-acres of land. A Non-Emergency Demolition Permit also is requested for the proposed demolition of a Spanish Colonial Revival-style adobe structure constructed in 1946 that is classified as a historic resource. The structure originally was constructed as a single-family residence and was converted into a restaurant in 1963 (most recently known as "Hacienda de Vega") which was shuttered in 2017. Access to the site would be provided from South Escondido Boulevard via a 24-foot-wide private street. South Escondido Boulevard would be improved across the project frontage (eastern side) to include curb, gutter, and sidewalk. A southbound left-turn lane would be stripped across the project frontage. A total of 96 parking spaces would be provided on-site (garages/open guest spaces). On-street spaces would be restricted.

APPLICANT: Kitchell Development Company (S. Escondido LP)

An Initial Study has been prepared to assess this project as required by the California Environmental Quality Act and Guidelines, Ordinances and Regulations of the City of Escondido. The Initial Study and Draft Mitigated Negative Declaration (IS/MND) are on file in the City of Escondido Planning Division and can be viewed on the City of Escondido web site (*Active Development Projects*) at: https://www.escondido.org/2608-south-escondido-blvd-project.aspx. Further information may be obtained by contacting the Planning Division, telephone (760) 839-4537 or email at jpaul@escondido.org.

Findings: The findings of this review are that the Initial Study identified effects related to cultural/tribal cultural resources and noise that might be potentially significant. Design and minimization measures, revisions in the project plans, and/or mitigation measures agreed to by the applicant would provide mitigation to a point where potential impacts are reduced to less than a significant level. A public meeting for the adoption of the Final IS/MND by the Escondido City Council has not yet been scheduled.

Bill Martin, AICP
Director of Community Development

PREFACE

This Final Initial Study/Mitigated Negative Declaration (IS/MND) for the 2608 South Escondido Boulevard project (proposed project), Project No. ENV19-0007, includes revisions to the Draft IS/MND based on minor corrections and revisions from the City of Escondido. The Draft IS/MND for the proposed project was circulated for public review for 20 days (March 16, 2020 through April 5, 2020). The City of Escondido received 16 comment letters during the public review period The comment letters and responses to comments are located at the end of this Final IS/MND.

All revisions have been incorporated into this Final IS/MND. The revisions provided are summarized within the Errata, below, using an underline for additional text and strikeout for deleted text that was originally in the Draft IS/MND. These corrections and clarifications represent additional information or revisions that do not significantly alter the proposed project, change the significance conclusions, or result in significantly more severe environmental impacts associated with the proposed project.

ERRATA

This section contains revisions to the Draft IS/MND. The following corrections and changes are made to the Draft IS/MND and are incorporated herein as part of the IS/MND. These corrections and clarifications represent additional information or revisions that do no significantly alter the proposed project, change the IS/MND's significance conclusions, or result in significantly more sever environmental impacts associated with the proposed project.

The revisions that follow were made to the text of the Draft IS/MND. Amended text is identified by section and page number. Additions to the Draft IS/MND text are shown with underlining and text removed from the Draft IS/MND is shown with strikethrough.

The following revisions to the text of the Draft IS/MND are made:

Cover Page

Final ~~Draft~~

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
California Environmental Quality Act (CEQA)

Prepared by:

RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600~~1927 Fifth Avenue~~
San Diego, CA 9210~~8~~1

July ~~March~~ 2020

Environmental Checklist Form

XVII Transportation/Traffic, page 28

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII.	**TRANSPORTATION/TRAFFIC.** Would the project:				
a.	Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?~~establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit (or conflict with applicable traffic thresholds specified in City of Escondido Zoning Code Article 47)?~~	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?~~Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?~~	☐	☐	☒	☐
~~c.~~	~~Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?~~	☐	☐	☐	☒
~~d~~c.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
~~e~~d.	Result in inadequate emergency access?	☐	☐	☐	☒
~~f.~~	~~Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?~~	☐	☐	☒	☐

Environmental Checklist Supplemental Comments

Title Page

FINAL ~~DRAFT~~
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ENVIRONMENTAL CHECKLIST
SUPPLEMENTAL COMMENTS

V. Cultural Resources, page 8

According to the Historical Evaluation, the structure was designed and built in 1946 by Charles H. Paxton, part owner and operator of the Adobe Brick Manufacturing Company in Escondido and the Adobe Construction Company in La Jolla. Initially, the building was designed as a single-family residence for Charles Paxton, which he used as a model home for the Longview Acres Estates subdivision. The pool and detached garage were completed in 1949. In 1955 Charles Paxton moved out of the structure as his primary residence and in 1962 it was converted into a restaurant. As such, the structures meet the minimum area requirement threshold of 50 years to be considered a historic structure, and therefore, were evaluated for significance. ~~As such, the structures~~

~~meet the minimum area requirement threshold of 50 years to be considered a historic structure, and therefore, was evaluated for significance.~~

The structure~~s~~ was ~~were~~ evaluated for historical significance using the California Register of Historic Resources (CRHR) criterion and the City's Register criteria. Based on the analysis conducted in the Historical Evaluation, it was determined that the ~~building and~~ garage ~~are~~ would be considered ineligible for listing on the CRHR under any eligibility criteria due to an overall lack of integrity. However, ~~W~~while the garage is ineligible for the City's ~~of Escondido~~ Register due to an overall lack of integrity, the residential/restaurant building was determined to be eligible for designation on the City's Register under eligibility Criteria 1, 3, 5, and 7 for the following reasons:

- Escondido Criterion 1 is met because of the structure's association with Charles Paxton, who contributed to the development of adobe brick residences in the City in the 1940s and 1950s. The home served as his residence during a majority of the time that he was active in the construction industry in Escondido and also served as the model home for the Longview Acres Estates subdivision.
- Escondido Criterion 3 is met because the structure was constructed using locally sourced adobe bricks manufactured by the Adobe Brick Manufacturing Company, which is no longer in operation, and served as the model home for the Longview Acres Estates subdivision.
- Escondido Criterion 5 is met because the structure is over 50 years of age.
- Escondido Criterion 7 is met because the structure was one of a limited number of residences in the City that were built using adobe bricks.

~~(constructed using locally-sourced adobe bricks and an association with Charles Paxton and the adobe revival movement in southern California in the 1940s and 1950s).~~ Based on the criterion met, the Historic Evaluation determined that the structure is considered a historical resource, the loss of which would be considered potentially significant (Impact CUL-1).

An additional evaluation was conducted by the project applicant to determine whether there could be any reasonable alternative to demolition. This includes incorporation of the existing adobe structure and outbuilding into the project design. The result of this alternatives analysis concluded that incorporation of the abobe structure would result in a reduction in the number of units from the proposed 42 to between 24 to 28 units (a reduction of up to 18 units or 57 percent). Reusing the adobe structure for use as a restaurant as a component is not desirable or practical as the site is now privately owned, and there would not be an area to provide suitable seating to support the use as all seating was provided outdoors. In addition, suitable on-site parking would not be available and on-street parking is restricted. Incorporation of the structure as a recreational/open space component of the project also is not practical or reasonable as the previous occupancy type would be changed triggering required upgrades to the structure to conform to current building code standards. Retaining the structure also would significantly reduce the residential density of the project, and would not allow on-site nuisance and hazards associated with the current condition of the structure to be abated.

~~Based on this evaluation~~In addition, the structure was found to be structurally unsound and fails to meet building code requirements for commercial and/or residential structures, specifically earthquake compliance. Specifically the structure fails to meet earthquake compliance due to a lack of structural framing. In order to meet code requirements, the adobe brick walls would need to be reinforced with rebar, which would involve both the deconstruction and the reconstruction of the building to be reinforced or salvaged and new veneer facades attached to a code compliant block would be required to reinforce a new building. The estimated cost for such demolition, salvage, and rebuilding of the 2,725-square-foot building would be approximately $350 per square foot, which would make the proposed project financially infeasible from a total development cost standpoint. ~~In addition, due to its central location on the lot, incorporating the existing structure into the design of the project would result in a significant reduction in developable area for the multi-family components of the project and, therefore, make the project infeasible.~~ Thus, there is no reasonable alternative left to pursue, other than demolition. Demolition of the building would result in a significant impact to a historical resource (Impact CUL-1).

To reduce the potentially significant impact due to the loss of the historic structure, the mitigation measures would be required as conditions of project approval. The mitigation measures, detailed below, are adequate to ensure the loss of the abode structure is recorded as a resource, materials are salvaged and available for historical or archival depositories, and signage or other interpretive/commemorative reminders are available to the public. These mitigation measures are adequate to reduce the significant impact due to structural changes made to the

resource itself. Specifically, modifications made to the building to convert it into a restaurant beginning in 1962 negatively impacted the original design and function of the building by introducing doors into new openings (by removing portions of walls), replacing original doors and windows, removing the northeast corner of the building and adding a flat-roofed, stucco-clad addition. Overall, the modifications made to the building and the property overall have negatively impacted the building's original design, setting, materials, workmanship, and feeling associated with the original residence. This conversion does not represent an important historic event; there was no broad pattern of events in the 1960s that resulted in residential buildings on the outskirts of the City being converted into restaurants.

~~The 2608 South Escondido Boulevard building was determined to meet two (location and association) of the seven categories of the integrity analysis. Due to previous modifications resulting from the conversion of the residence into a restaurant, the building no longer retains integrity of design, setting, materials, workmanship or feeling. The building also is considered in its current state to be structurally sound and does not meet code requirements for commercial and residential structures, specifically earthquake compliance, due to a lack of structural framing. In order to meet code requirements, the adobe brick walls would need to be reinforced with rebar, which would involve both the deconstruction and the reconstruction of the building. This would likely damage the original building materials and would be financially infeasible. Due to the type of construction and adobe materials, it also is not practical to demo, salvage, and rebuild (relocate) the structure(s). However, the adobe materials could be salvaged and reused on- or off-site. Therefore, impacts to this historical structure could not be practically mitigated by preserving and enhancing the structure in order to ensure compliance with existing regulations.~~ Thus, the project applicant would be required to conduct the following mitigation measures in order to reduce impacts associated with the demolition of a significant historic resource to a less than significant level.

No changes to the mitigation measures are proposed.

XVII. Transportation, page 31

Section XVII(b) has been deleted in its entirety. Consistent with the California Governor's Office of Planning and Research (OPR) vehicle miles travelled (VMT) is the CEQA metric to evaluate a project's transportation impacts. Senate Bill 743 (SB 743) shifted the transportation impact measure of effectiveness from LOS to VMT. As part of the State's CEQA Guidelines, the changes included the elimination of vehicular delay and LOS for determining significant transportation impacts. The previous analysis was based on LOS and has been replaced with a VMT analysis. Likewise, Section XVII(f) has been deleted consistent with the new CEQA Guidelines effective July 1, 2020.

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

The project is consistent with existing zoning and does not include any changes to the City's existing circulation plan. The project would improve the roadway along the project frontage to include widening along the eastern side of South Escondido Boulevard and the installation of curb, gutter, and sidewalk. A dedicated left-turn lane into the project site also would be striped. These project design features would enhance existing transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The following impact analysis is based on the Draft Vehicle Miles Traveled and Local Transportation Analysis ~~Transportation Impact Analysis~~ prepared for the project by LOS Engineering, Inc. (Appendix H). The California Governor's Office of Planning and Research (OPR) has identified VMT as the CEQA metric to evaluate a project's transportation impacts. Senate Bill 743 (SB 743) shifted the transportation impact measure of effectiveness from LOS to VMT. As part of the State's CEQA Guidelines, the changes included the elimination of vehicular delay and LOS for determining significant transportation impacts.

Methodology

The City of Escondido Engineering Staff requested the VMT analysis to be based on the local San Diego Institute of Transportation Engineers (ITE) "Guidelines for Traffic Impact Studies in the San Diego Region," May 2019. The project utilized San Diego ITE VMT Guidelines Alternative 1 for determining a minimum project size below which VMT impacts are presumed to be less than significant.

- Alternative 1 is based on the previous SANTEC/ITE Guidelines threshold of defining projects with less than 1,000 ADT and consistent with the zoning as presumed to have less than significant VMT impacts.

Based on direction from City staff, Alternative 1 was applied to this project because the project is in the San Diego region. The trip generation for the 42 multi-family units is calculated to generate 336 ADT as shown in Table 12.

Table 12
Project Trip Generation for VMT Screening

Proposed Land Use	Rate	Size and Units	ADT
Residential- Multi-family	8/ DU	42 DU	336

SOURCE: Appendix H.
DU = dwelling unit; ADT = average daily traffic

Based on the San Diego ITE Guidelines, the project is presumed to have a less than significant VMT impact due to the trip generation being less than 1,000 ADT.

VMT Analysis

SANDAG adopted the Regional Comprehensive Plan (RCP) for the San Diego region in 2004. The RCP outlines a vision for the San Diego region based on smart growth and sustainability. As part of the RCP, smart growth concept maps were developed showing the locations of existing, planned, and potential smart growth areas. The project is located within smart growth area ES-6 (Community Center). Smart growth area ES-6 encompasses an area of mixed-uses to promote walking/biking between residential and commercial/office uses; thereby, helping reduce VMT. A copy of the SANDAG smart growth concept map is included in Appendix C of the Transportation Analysis.

According to the San Diego ITE Guidelines, the project is presumed to have a less than significant VMT traffic impact because the project trip generation of 336 ADT is less than the 1,000 ADT threshold. Additionally, the project site is located within SANDAG's smart growth area ES-6 that includes mixed uses to promote walking/biking between residential and commercial/office uses to help reduce VMT. Therefore, VMT impacts would be less than significant.

The remainder of the section has been deleted in its entirety based on the updated VMT analysis which replaced the previous Level of Service (LOS) analysis.

Subsections b and c have been deleted as a result of updates the CEQA Guidelines Appendix G, Environmental Checklist Form.

c. Subsection d has become Subsection c, which questions whether the project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

~~e~~d. Subsection e has become Subsection d, which questions whether the project would result in inadequate emergency access?

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

~~**Less Than Significant Impact.** Access to the site would be provided from South Escondido via a 24-foot-wide private street. Sidewalk and off-site road improvements would be included as part of the project, including a sidewalk along the western side of the site connecting to the existing paved sidewalk located north of the project site along the adjacent development. Internal circulation would be comprised of multiple private roads along and pedestrian connections to the project's center open space area. A total of 95 parking spaces would be provided on-site (garages/on-street). The project would not conflict with pedestrian access to public transit facilities, as there are no public transit facilities within the immediate vicinity of the project site. Centre City Parkway is designated as include Class II bike lanes on the City's Bike Master Plan until it transitions into Interstate 15 right-of-way. The project would have not impacts to the existing or proposed bike lanes. Therefore, impacts would be less than significant.~~

Material Used in Preparation of this Analysis, page 36

H: Escondido Multi-Family Development (42 Units) Draft Vehicle Miles Traveled and Local Transportation Analysis~~Transportation Impact Analysis~~, LOS Engineering, Inc., June 17, 2020~~October 3, 2019~~

Sources of Information, page 37

LOS Engineering, Inc.
~~2019 Escondido Multi-Family Development (42 Units) Transportation Impact Analysis. October.~~
2020 Escondido Multi-Family Development (42 Units) Draft Vehicle Miles Traveled and Local Transportation Analysis, June 17.

CITY OF ESCONDIDO
Planning Division
201 North Broadway
Escondido, CA 92025-2798
(760) 839-4671
www.escondido.org

Environmental Checklist Form (Initial Study Part I)

1. Project title and case file number: 2608 South Escondido Boulevard Project; Case # ENV19-0007, SUB 19-0010 and PHG19-0050

2. Lead agency name and address: City of Escondido, 201 N. Broadway, Escondido, CA 92025

3. Lead agency contact person name, title, phone number and email:
   Jay Paul, Senior Planner (760) 839-4537 jpaul@escondido.org

4. Project location: 2608 South Escondido Boulevard, Escondido, California 92025
   (APNs 238-152-06-00, 238-152-07-00)

5. Project applicant's name, address, phone number and email: Tony Cassoloto, 576 Camino El Dorado, Encinitas, CA 92024; tonygc@cox.net

6. General Plan designation: Specific Plan (SP)

7. Zoning: South Centre City Specific Plan (Southern Entry District-Mixed Use)

8. Description of project: (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   The 2608 South Escondido Boulevard Project (project) is located in the County of San Diego, City of Escondido, California (Figures 1 and 2). The project site is bounded by South Escondido Boulevard to the west, Escondido Lodge to the south and east, and a new multi-story residential development, "Citron", to the north. (Figure 3). The approximately 1.75-acre project site is currently developed with an abandoned single-story restaurant structure with associated outbuildings, concrete flatwork, landscaping, utilities, and other minor improvements. The topography of the project site generally descends to the southeast with elevations ranging from approximately 577 feet above mean sea level (msl) in the northwest to approximately 567 feet msl to the southeast.

   The project site has General Plan land-use designation as Specific Plan and is located in the South Centre City Specific Plan (Southern Entry District) with a mixed-use overlay. The proposed project would be consistent with both the General Plan land-use designation and zoning code. The project requires the following discretionary permit applications: Condominium Permit; Tentative Subdivision Map (one-lot/air-space condominium units); Plot Plan; and Non-Emergency Demolition Permit (required for the demolition of a historic resource).

   The project includes the demolition of the existing structures and the construction of 42, three-story residences in a new multi-family development (Figure 4) at a density of 24 dwelling units per acre. Additional on-site amenities include various open space areas, barbeque/sitting area, and open space walkways.

   Grading quantities include approximately 1,700 cubic yards of cut and 1,700 cubic yards of fill, for a balanced grading design. Retaining walls are proposed along the southern and eastern boundary of the project site. The project would change the visual character of the site from a fenced abandoned restaurant structure to a residential community similar in character to the neighboring project (Citron). Demolition of the existing on-site structures could result in removal of asbestos or other toxic materials; however, the project would adhere to all state and local regulations relating to the removal of such materials.

   Access to the site would be provided from South Escondido Boulevard via a 24-foot-wide private street (Street "A"). South Escondido Boulevard would be improved across the project frontage (eastern side) to include curb, gutter, and sidewalk. A southbound left-turn lane would be stripped across the project frontage. A total of 96 parking spaces would be provided on-site (garages/open guest spaces). On-street spaces would be restricted.

   As shown in the project's Concept Landscape Plan (Figures 5a and 5b), all landscaping, brush management, and

irrigation would conform to the requirements of the City of Escondido's (City's) Water Efficient Landscape Regulations (Escondido Municipal Code Article 62). The project architecture includes Mediterranean/Santa Barbara and rustic type elements. A palette of earth toned colors would be used including wood and stucco materials to compliment the residential neighborhood surrounding the project. Decorative shutters, awnings, and gable accents would also enhance the visual quality of the project site. The proposed site design includes a diversity of architectural elevations and color modelling to integrate the project (Figure 5c). The retaining walls would be accented by a 42-inch tubular steel guard rail and a brown split fence or wood fence would surround the project site. Garages generally would be rear facing (inward towards the project driveways).

The project also proposes a biofiltration/treatment basin along a portion of the southern and eastern boundary. On-site private storm drains would collect runoff and direct the flow into outlets within the bioretention basins and then to the City's existing storm water system.

The City would provide sewer and water service via connections to an existing public sewer and water main along Cranston Drive and South Escondido Boulevard, respectively. The project site is served by the City for water, sewer, storm water, fire, and police and is located within the Escondido Union School District.

9. Surrounding land uses and setting (briefly describe the project's surroundings):

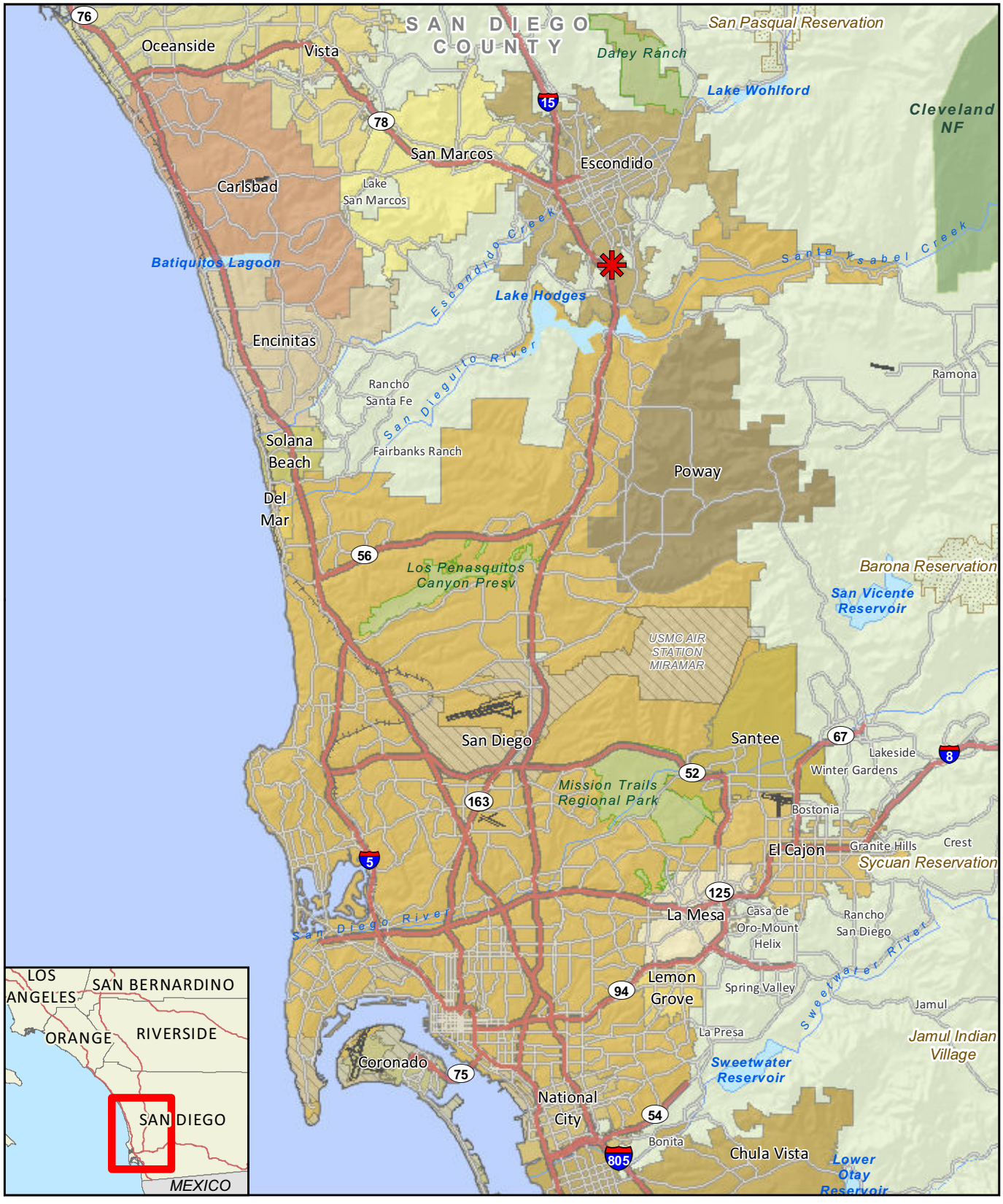
The project site is located within the City's General Plan area and currently developed with a single-story adobe structure constructed in 1946 and other outbuildings that previously were used for residential and commercial/restaurant purposes. Use of the site as a restaurant ceased in 2017 and the property is secured by a chain-link fence. The project site generally is surrounding by a mix of multi-family, single-family, and hotel land uses. The site is accessible to and from Interstate 15 (0.25 mile to the west) and State Route 78 (2.3 miles to the northeast) with Centre City Parkway (Super Major Road) and South Escondido Boulevard (Local Collector Road) bordering the property's western frontage. Immediately south and east of the project site is the Escondido Lodge, while the Citron multi-family development lies directly to the north. Single-family development is located further to the east. Vegetation on the site primarily consists of ornamental landscaping associated with the previous uses and a variety of mature trees. The site does not contain any native or sensitive habitat or species. The project site is surrounded by urban development on all sides.

10. Tribal Consultation. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has this consultation begun?

Pursuant to Assembly Bill 52, the City sent letters on October 25, 2019, to the San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, Soboba Band of Luiseno Indians and Mesa Grande Band of Mission Indians; these tribes have requested formal notification of projects within the City. Written responses were received from the San Luis Rey Band and Rincon Band requesting formal consultation. Formal consultation was conducted with representative(s) of the San Luis Rey Band on November 19, 2019 and with representative(s) of the Rincon Band on January 8, 2020 (by phone). Additional information requested regarding the project (Cultural Resource Survey) was forwarded to the Rincon Band on December 26, 2019.

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

- San Diego Regional Water Quality Control Board (Region 9): Construction General Permit Stormwater Pollution Prevention Plan



Project Location

RECON

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FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, Escondido quadrangle, 1996, SAN BERNARDO (SNOOK) Land Grant

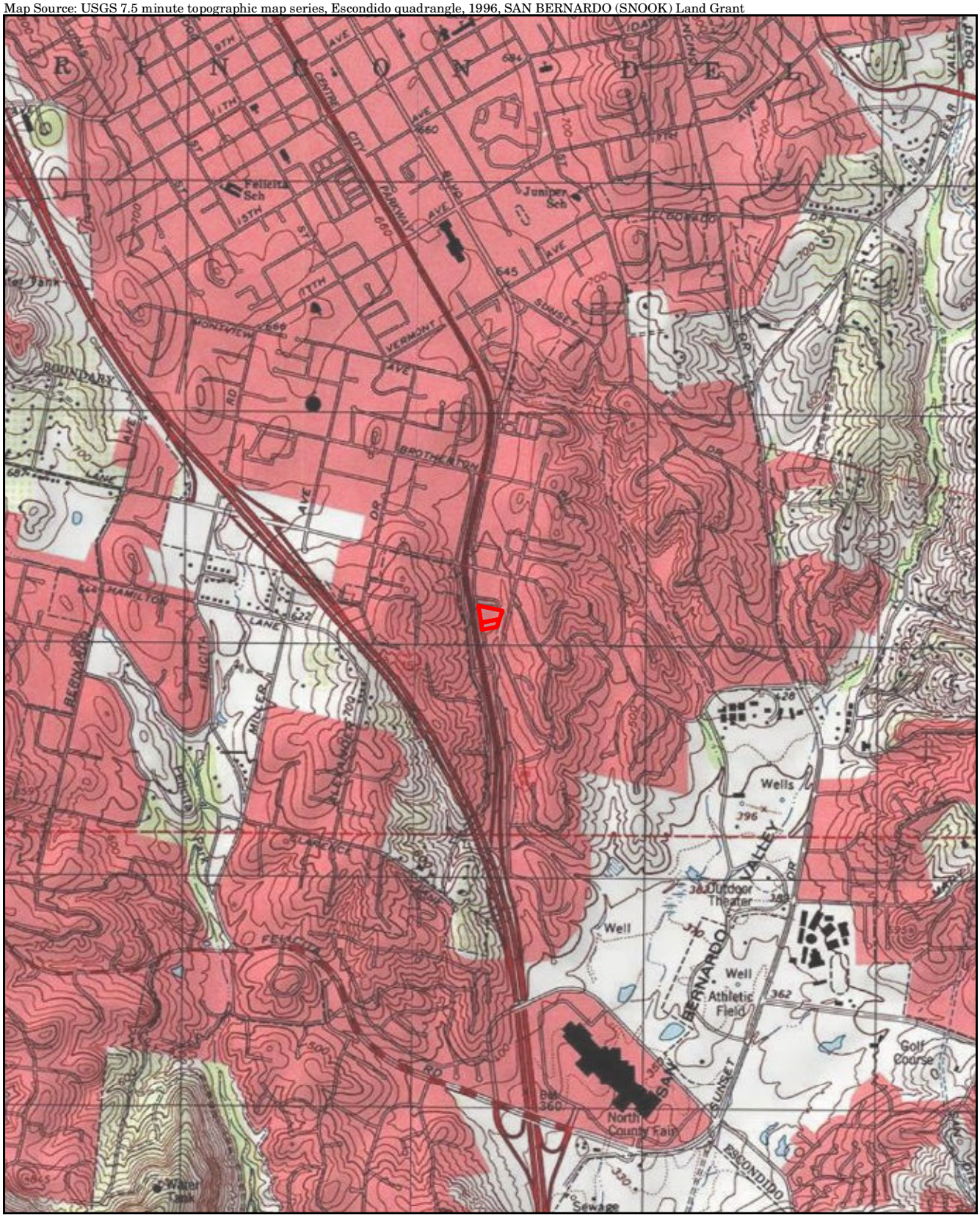

FIGURE 2

Project Location on USGS Map

RECON

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Image Source: Nearmap (flown September 2019)

Parcel Boundary

RECON

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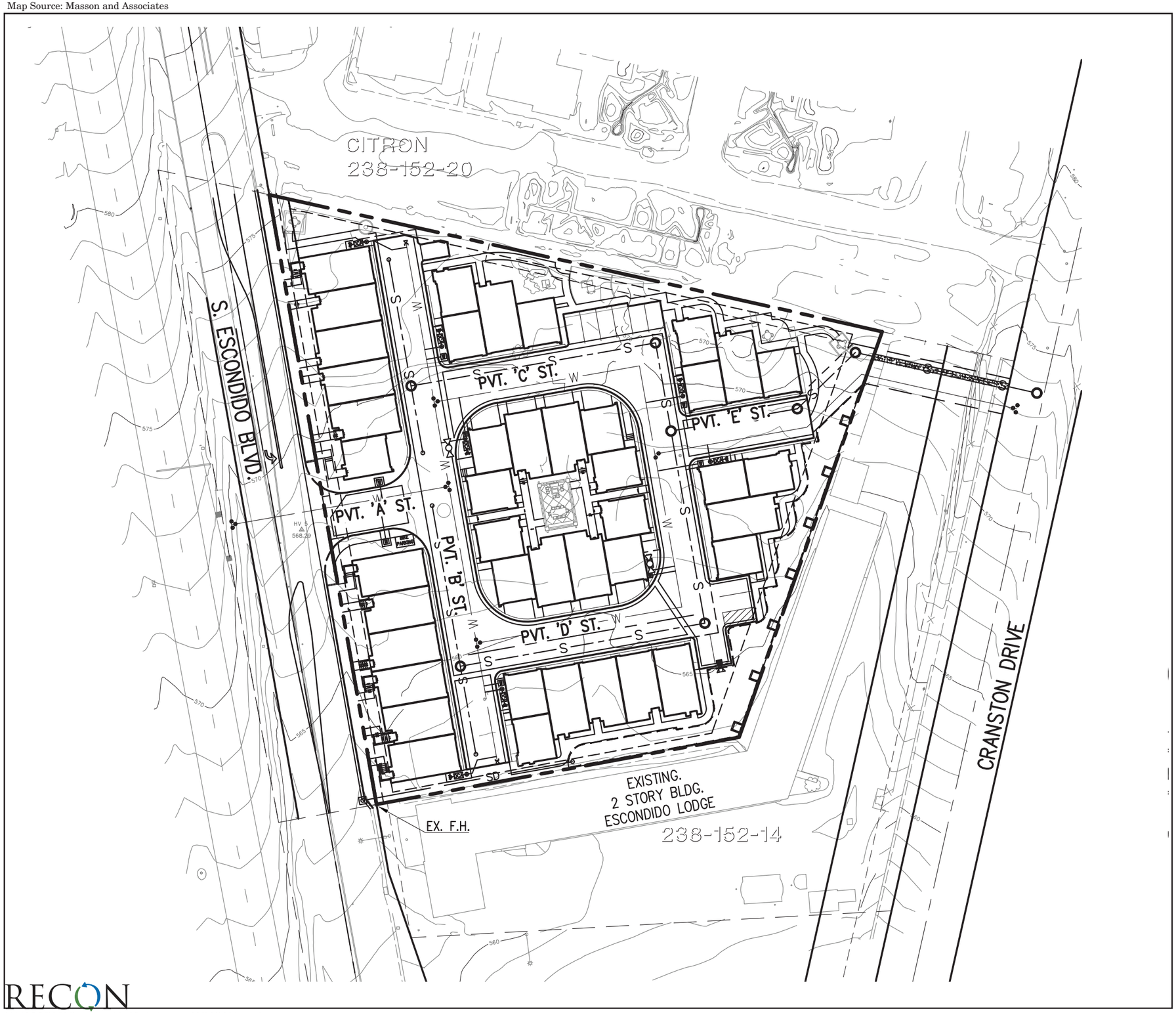
FIGURE 3

Project Location on Aerial Photograph

Map Source: Masson and Associates



LEGEND:

- PROJECT BOUNDARY
- EXISTING CONTOURS — 605
- EXISTING EASEMENT LINE
- SETBACK LINES
- PROPOSED EASEMENT LINE
- PROPOSED UNIT NUMBER — UNIT 10
- PROPOSED FINISH FLOOR ELEVATION — FF=567.4
- PROPOSED GARAGE FLOOR ELEVATION — GF=XXXX
- PROPOSED BUILDING FOOTPRINT
- GRADED SLOPE 2:1 TYPICAL — 2:1
- PROPOSED CONTOURS — 605
- PERCENT OF GRADE — 1%
- FINISH SURFACE ELEVATION — 601.0 FS
- FINISH GROUND ELEVATION — 601.0 FG
- TOP OF CURB ELEVATION — 601.0 TC
- PROPOSED 6" CURB
- PROPOSED 6" CURB & GUTTER
- PROPOSED ROLLED CURB
- PROPOSED AC PAVEMENT
- PROPOSED RETAINING WALL
- PROPOSED BIO-FILTRATION BASIN
- PROPOSED PUBLIC SEWER LINE — S
- PROPOSED PUBLIC WATER LINE — W
- PROPOSED FIRE HYDRANT
- PROPOSED FDC
- PROPOSED BACKFLOW / DETECTOR CHECK ASSEMBLY — DCA
- PROPOSED PIV
- PROPOSED WATER SERVICE WITH BACK FLOW PER W-10-E — W
- PROPOSED PRIVATE STORM DRAIN — SD
- PROPOSED PUBLIC UTILITIES AND EMERGENCY ACCESS EASEMENT
- PROPOSED PERMEABLE PAVERS IN PARKING STALLS

0 Feet 50

RECON

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FIGURE 4
Site Plan

Map Source: Howard Associates Landscape Architecture

SITE ADDRESS
2608 S. ESCONDIDO BLVD
ESCONDIDO, CA 92025

OWNER/APPLICANT DEVELOPER
TONY CASSOLATO
516 CAMINO EL DORADO
ENCINITAS, CA. 92024
619.823.3602

IRRIGATION STATEMENT

1. THE IRRIGATION SYSTEM SHALL COMPLY WITH THE REQUIREMENTS OF THE CITY OF ESCONDIDO WATER EFFICIENT LANDSCAPE REGULATIONS, MC ART. 62
2. ALL PLANTED AREAS SHALL HAVE AN AUTOMATIC IRRIGATION SYSTEM. SHRUB AND GROUNDCOVER AREAS SHALL UTILIZE LOW-VOLUME SUBSURFACE DRIP EMISSION DEVICES, PREVENTING RUNOFF AND OVERSPRAY. SLOPE AREAS SHALL UTILIZE LOW PRECIPITATION RATE ROTATOR NOZZLES
3. THE AUTOMATIC CONTROLLER SHALL BE A SMART CONTROLLER, WITH WEATHER SENSING FEATURES AND FLOW MANAGEMENT CAPABILITIES.
4. THE IRRIGATION SYSTEM VALVES SHALL BE SEPARATED BY HYDROZONE, WITH RESPECT TO SIMILAR SITE, SUN EXPOSURE, SOIL CONDITIONS AND PLANT MATERIAL WITH SIMILAR WATER USE.
5. ONLY SUBSURFACE IRRIGATION SHALL BE USED WITHIN 24" OF A PAVED SURFACE
6. TREES SHALL BE PLACED ON SEPARATE VALVES FROM SHRUBS AND GROUNDCOVER, UTILIZING DEEP ROOT BUBBLERS
7. THE PROJECTS ESTIMATED WATER USE (ETWU) SHALL NOT EXCEED THE MAXIMUM APPLIED WATER ALLOWANCE (MAWA)
8. ALL TREES SHALL BE LOCATED:
   - MIN. 10' FROM FIRE HYDRANTS, UTILITY POLES, OVERHEAD UTILITY WIRES, STREET LIGHTS, & UTILITY STRUCTURES
   - MIN. 5' FROM UNDERGROUND UTILITY LINES
   - MIN. 8' FROM UNDERGROUND SEWER LINES

INVASIVE SPECIES

NO NON-NATIVE INVASIVE PLANT SPECIES SHALL BE USED, PER THE CALIFORNIA EXOTIC PEST PLANT COUNCIL LIST A-1, AND CALIFORNIA INVASIVE PLANT COUNCIL (CAL-IPC)

MAINTENANCE NOTES

ALL LANDSCAPED AREAS WILL BE MAINTAINED BY HOA

DESIGN FEATURES

1. ALL PLANTING WITHIN CORNER SIGHT LINE DISTANCE AREAS SHALL HAVE A MAXIMUM MATURE HEIGHT OF 30"
2. ALL PLANTED AREAS OTHER THAN SLOPES AND LINED BASIN SHALL RECEIVE A 3" LAYER OF SHREDDED BARK MULCH
3. ALL PLANTS SHALL BE SELECTED FOR DROUGHT TOLERANCE AND 'LOW MAINTENANCE. ALL SHRUBS AND GROUNDCOVERS SHALL BE WUCOLS RATED 'LOW' FOR WATER USE.
4. ALL SLOPES OVER 3' HEIGHT SHALL BE LANDSCAPED PER EROSION CONTROL GUIDELINES

NEW LANDSCAPED AREA

TOTAL SF. SITE: 76,135 SF.
TOTAL LANDSCAPING: 14,470 SF.
% OF SITE LANDSCAPED: 19%

Plant Legend

SYMBOL	BOTANICAL NAME	COMMON NAME	ZONE 4 WUCOLS
Trees:			
	Street Trees - S. Escondido Blvd: (24" Box)		
	KOELREUTERICA PANICULATA	GOLDEN RAIN TREE	M
	Entry Drive Street Trees: (24" Box)		
	X. CHITALPA TASHKENTENSIS	CHITALPA	L
	LAGERSTROEMIA I. 'MUSKOGEE'	CRAPE MYRTLE	M
	PRUNUS BLIERIANA	PURPLE LEAF PLUM	M
	Internal Street Trees: (24" Box)		
	PODOCARPUS GRACILIOR	FERN PINE	M
	ULMUS PARVIFOLIA	CHINESE ELM	L
	TRISTANIA CONFERTA	BRISBANE BOX	M
	Community Open Space Trees: (24" Box)		
	X. CHITALPA TASHKENTENSIS	CHITALPA	L
	LAGERSTROEMIA I. 'MUSKOGEE'	CRAPE MYRTLE	M
	PRUNUS BLIERIANA	PURPLE LEAF PLUM	M
	RHUS LANCEA	AFRICAN SUMAC	L
	TRISTANIA CONFERTA	BRISBANE BOX	M
	SYAGRUS ROMANZOFFIANA	QUEEN PALM	M
	Columnar Accent Trees: (5 Gal - 15 Gal)		
	PODOCARPUS 'MAKI'	SHRUBBY YEW PINE	M
	BUXUS 'UPTIGHT'	COLUMNAR BOXWOOD	M
	ILEX 'COLONADE'	COLUMNAR HOLLY	M
	EUNONYMUS 'GREEN SPIRE'	GREEN SPIRE EUONYMUS	M
Shrubs & Ground Covers:			
	Common Area Accent Shrubs: (1 gal - 5gal)		
	AGAVE SPP.	AGAVE	L
	ALYOGYNE HUEGELII	BLUE HIBISCUS	L
	ANIGOZANTHOS HYB.	KANGAROO PAW	L
	ALOE SPP.	ALOE	L
	ALOE ARBORESCENS	TORCH ALOE	L
	Common Area Foundation Shrubs: (1-5 gal. @ 3' - 4' o.c.)		
	NESTRINGIA FRUTICOSA	COAST ROSEMARY	L
	RHAPHIOLEPIS INDICA	INDIA HAWTHORN	L
	LIGUSTRUM 'TEXANUM'	JAPANESE PRIVET	M
	PITTOSPORUM SPP.	PITTOSPORUM	M
	BUXUS JAPONICA	JAPANESE BOXWOOD	M
	TECOMA 'ORANGE JUBILEE'	ORANGE BELLS	L
	Common Area Ground Covers: (Flats @ 12" o.c.)		
	BACCHARIS 'PIGEON POINT'	COYOTE BRUSH	L
	MYOPORUM 'PUTAH CREEK'	DWARF MYOPORUM	L
	ROSMARINUS 'HUNTINGTON CARPET'	ROSEMARY	L
	SENECIO MANDRILISCAE	BLUE CHALK STICKS	L
	Common Area Massing Shrubs: (1 gal - 5gal)		
	CALLISTEMON 'LITTLE JOHN'	DWARF BOTTLEBRUSH	L
	CISTUS 'LITTLE MISS SUNSHINE'	ROCKROSE	L
	DIANELLA REVOLUTA	LITTLE REV FLAX LILY	L
	DIETES 'BICOLOR'	FORTNIGHT LILY	L
	LANTANA GOLD MOUND	GOLD MOUND LANTANA	L
	LOMANDRA L. 'BREEZE'	DWARF MAT RUSH	L
	RHAPHIOLEPIS 'BALLERINA'	DWARF INDIA HAWTHORN	L
	ROSMARINUS 'TUSCAN BLUE'	ROSEMARY	L
	SALVIA C. 'WINNIFRED GILMAN'	BLUE SAGE	L
	NANDINA DOMESTICA	HEAVENLY BAMBOO	M
	SALVIA LEUCANTHA	MEXICAN BUSH SAGE	L
	CARISSA 'GREEN CARPET'	DWARF NATAL PLUM	M
	Bio-Filtration Basins (Plugs @ 12" o.c.):		
	JUNCUS P. 'CANYON GREY'	GREY RUSH	L
	MUHLENBERGIA RIGENS	DEER GRASS	L
	Common Area Turf: MARATHON DWAF FESCUE		
	Common Area Turf: MARATHON DWAF FESCUE IN TURFBLOCK		

0 Feet 40

RECON

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FIGURE 5a
Landscape Plan

Map Source: Howard Associates Landscape Architecture

WATER EFFICIENT LANDSCAPE WORKSHEET

REFERENCE EVAPOTRANSPIRATION (ETo)____ 57.0

Hydrozone # / Planting **(a)** Description	Plant Factor (PF)	Irrigation **(b)** Method	Irrigation Efficiency **(c)** (IE)	ETAF (PF/IE)	Landscape Area In Square Feet	ETAF x Area	Estimated Total Water Use **(d)** (ETWU)
Regular Landscape Areas							
1- Basin-Low	0.3	MP Rotator	0.75	0.40	2,769	1,108	39,143
2-Slopes-Low	0.3	MP Rotator	0.75	0.40	1,523	609	21,529
3-Common Area Shrub-Low	0.3	Drip-sub	0.81	0.37	7,921	2,934	103,677
4-Common Area Shrub-Mod	0.5	Drip-sub	0.81	0.62	2,257	1,393	49,236
				Totals	14,470	6,044	213,585
Special Landscape Areas							
5-Common Area Turf-High				1.0	1,789	1,789	63,223
				Totals	1,789	1,789	63,223
						Estimated Total Water Use **(ETWU) Total**	276,808
						Maximum Water Allowance **(MAWA)(e)**	277,999
						Irrigation Efficiency **(IE) Average****	0.60

****Average Irrigation Efficiency for overall irrigation system shall meet or exceed 0.75 (total of all efficiency ratings divided by number of hydrozones).**

ETAF CALCULATIONS

Average ETAF for Regular Landscape Areas must be 0.55 or below for residential areas and 0.45 or below for non-residential areas.
Provide Totals based on information calculated in Worksheet above.

Regular Landscape Areas		***Totals***
Total ETAF x Area	(B) =	6,044
Total Area	(A) =	14,470
Average ETAF	**(B) ÷ (A) =**	0.42

All Landscape Areas		***Totals***
Total ETAF x Area	(B+D) =	7,833
Total Area	(A+C) =	16,259
Site wide ETAF	(B+D) ÷ (A+C)	0.48

Hydrozone Map

Hydrozone 1:
Shrubs and Groundcover at
Bio Retention Basin
Low Water Use MP Rotator Irrigation Area

Hydrozone 2:
Shrubs and Groundcover at Slopes
Low Water Use MP Rotator Irrigation Area

Hydrozone 3:
Common Area Shrubs and Groundcover
Low Water Use Drip Irrigation Area

Hydrozone 4:
Common Area Shrubs and Groundcover
Moderate Water Use Drip Irrigation Area

Hydrozone 5:
Common Area Turf
High Water Use Drip Irrigation Area

0 Feet 40

RECON

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FIGURE 5b
Landscape Plan

Source: Summa Architecture

Building A

Building B

FIGURE 5c
Elevations/Architectural Renderings

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

☐ I find that the proposed project might have a significant effect on the environment and/or deficiencies exist relative to the City's General Plan Quality of Life Standards, and the extent of the deficiency exceeds the levels identified in the City's Environmental Quality Regulations pursuant to Zoning Code Article 47, Section 33-924 (b), and an ENVIRONMENTAL IMPACT REPORT shall be required.

☐ I find that the proposed project might have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect: a.) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and b.) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT shall be required, but it shall analyze only the effects that remain to be addressed.

☐ I find that, although the proposed project might have a significant effect on the environment, no further documentation is necessary because all potentially significant effects: (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.

Signature

MARCH 12, 2020 (DRAFT)
AUGUST 17, 2020 FINAL
Date

Jay Paul, Senior Planner
Printed Name and Title

City of Escondido

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. This section evaluates the potential environmental effects of the proposed project, generally using the environmental checklist from the State CEQA Guidelines as amended and the City of Escondido Environmental Quality Regulations (Zoning Code Article 47). A brief explanation in the Environmental Checklist Supplemental Comments is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. All answers must take into account the whole action involved, including off-site, on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts and mitigation measures. Once the lead agency has determined that a particular physical impact might occur, than the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. The definitions of the response column headings include the following:

   A. "Potentially Significant Impact" applies if there is substantial evidence that an effect might be significant. If there are one or more "Potentially Significant Impact" entries once the determination is made, an EIR shall be required.

   B. “Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 2 below, "Earlier Analyses," may be cross-referenced). Measures incorporated as part of the Project Description that reduce impacts to a “Less than Significant” level shall be considered mitigation.

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

   D. "No Impact" applies where a project does not create an impact in that category. “No Impact” answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. Earlier Analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   A. Earlier Analysis Used. Identify and state where it is available for review.

   B. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of an adequately analyzed earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   C. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

4. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

5. The explanation of each issue should identify the significance of criteria or threshold, if any, used to evaluate each question, as well as the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:				
	a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
	b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
	c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
	d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	**AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.				
	Would the project:				
	a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?	☐	☐	☐	☒
	b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
	c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
	d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
	e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	**AIR QUALITY.** Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
	a. Conflict with or obstruct implementation of the applicable air quality plan (or applicable air quality thresholds specified in City of Escondido Zoning Code Article 47)?	☐	☐	☒	☐
	b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
	c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
	d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
	e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

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

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES.** Would the project:				
a.	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 (or conflict with applicable historic thresholds specified in City of Escondido Zoning Code Article 47)?	☐	☒	☐	☐
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	**Energy.** Would the project:				
	a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
	b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (or conflict with applicable greenhouse gas emissions thresholds specified in City of Escondido Zoning Code Article 47)?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e.	For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g.	Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	**HYDROLOGY AND WATER QUALITY.** Would the project:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial/increased erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e.	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f.	Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303 (d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired? Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
h.	Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
i.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
j.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
k.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	**LAND USE PLANNING.** Would the project:				
	a. Physically divide an established community?	☐	☐	☐	☒
	b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
	c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐

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

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.	**NOISE.** Would the project result in:				
a.	Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (or conflict with applicable noise thresholds specified in City of Escondido Zoning Code Article 47)?	☐	☐	☒	☐
b.	Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e.	For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services (or conflict with applicable fire and emergency response time thresholds specified in City of Escondido Zoning Code Article 47):				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.	**RECREATION.** Would the project:				
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII.	**TRANSPORTATION/TRAFFIC.** Would the project:				
a.	Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities??	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d.	Result in inadequate emergency access?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c.	Result in a determination by the wastewater treatment provided which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e.	Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	**WILDFIRE.** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
	b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
	c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
	d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c.	Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
d.	Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a))?	☐	☒	☐	☐

FINAL
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ENVIRONMENTAL CHECKLIST
SUPPLEMENTAL COMMENTS

2608 South Escondido Boulevard
(Project Case # ENV19-0007, SUB 19-0010 and PHG19-0050)

An Initial Study Environmental Checklist was prepared for this project and is included as a separate attachment to this Draft Initial Study/Mitigated Negative Declaration (IS/MND). The information contained in the Initial Study and the MND Supplemental Comments will be used by the City of Escondido to determine potential impacts associated with the project as required by the California Environmental Quality Act (CEQA) and State CEQA Guidelines, as well as relevant City Ordinances and Regulations.

INTRODUCTION

This MND assesses the environmental effects of the proposed 42-unit, multi-story 2608 South Escondido Boulevard Project (project) located at 2608 South Escondido Boulevard in the County of San Diego, City of Escondido, California (Assessor Parcel Numbers 238-152-06-00 and 238-152-07-00).

As mandated by CEQA Guidelines Section 15105, affected public agencies and the interested public may submit comments on the **Draft IS/MND** in writing before the end of the **20-day** public review period starting on **March 16, 2020**. Written comments on the Draft Initial Study/Mitigated Negative Declaration should be submitted to the following address by **5:00 p.m., April 6, 2020**. Following the close of the public comment review period, the City of Escondido will consider this MND and any received comments in determining the approval of this project.

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

A printed copy of this document and any associated plans and/or documents are available for review during normal operation hours for the duration of the public review period at the City of Escondido (City) Planning Division at the address shown above, and also available on the City's website at: https://www.escondido.org/2608-south-escondido-blvd-project.aspx. The City's General Plan Update (2012a); Final Environmental Impact Report (2012b); and Climate Action Plan are incorporated by reference. These documents are available for review at, or can be obtained through the City Planning Division or on the City's website.

ISSUES:

I. **AESTHETICS.** Would the project

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

Less Than Significant Impact. Scenic resources identified in the Resource Conservation Element of the City's General Plan include views to and from hillsides and prominent ridgelines, unique landforms, visual gateways, and edges of the community. The project site consists of an abandoned restaurant, the remains of outdoor amenities, and ornamental landscaping and does not possess any features or qualities that would qualify as a scenic vista. Furthermore, the project site is located in an urban environment that does not possess any features or qualities that would qualify as a scenic vista. Figure VII-5 of the General Plan Resource Conservation Element shows that the property is located within the vicinity of an intermediate ridgeline, to the east of Centre City Parkway; however, this ridgeline contains existing development and the project would not result in development that would otherwise result in the degradation of this ridgeline view. Views of this ridgeline have previously been impeded by the existing building and landscaping within the project site, as well as other development projects surrounding the project site. Similarly, the majority of slopes greater than 25 percent are located in the northern and eastern portions of the city and the project would not disturb any slopes or block existing views of peaks or slopes. Therefore, the project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

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

No Impact. There are no official State Scenic Highways as designated by the California Department of Transportation or considered eligible for such designation surrounding the project site. Additionally, the project site consists of an abandoned restaurant, disturbed groundcover, and ornamental landscaping and does not possess any designated scenic resources. Therefore, the project would not substantially damage scenic resources within a state scenic highway corridor. No impact would occur.

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

Less Than Significant Impact. The proposed project is located within the Southern Entry District (mixed-use overlay) as designated in the South Centre City Specific Plan. The project site contains an abandoned restaurant facility, along with the remains of outdoor amenities, disturbed groundcover, and ornamental landscaping. The project site is surrounded by existing multi-story/multi-family and a hotel-use development within an urbanized area. Development of the project would alter the current developed condition of the site to include the construction of 42 dwelling units contained within three-story units, along with parking garages, and ornamental landscaping as called for in the concept landscaping plan for the project. The project would be in conformance with development requirements for height, setbacks, and allowed density contained in the South Centre City Specific Plan, along with the Specific Plan design guidelines and open space requirements. The design of the project also would be compatible with the character of other existing multi-family residential, hotel and other uses surrounding the project site. As shown in the project's Landscape Plan and architectural designs (see Figures 5a, 5b, and 5c), all landscaping, brush management, and irrigation would conform to the requirements of the City's Water Efficient Landscape Regulations (Escondido Municipal Code Article 62). Therefore, the project would not conflict with the applicable zoning or other regulations governing scenic quality, would not degrade the existing visual character or quality of the site and its surroundings, and impacts would be less than significant.

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

Less Than Significant Impact. The project would incrementally increase lighting within the project area and the surrounding urban environment. However, the proposed lighting would be similar to the other surrounding uses. The most prominent light sources from the proposed project would be interior lighting for the residential units and any common areas, parking area lighting, exterior and landscaping lighting, and required street lighting. New lighting associated with the project would be required to comply with the City's Outdoor Lighting Ordinance (Escondido Municipal Code, Chapter 33, Article 35), which is intended to minimize unnecessary nighttime lighting and glare for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. The Outdoor Lighting Ordinance also requires appropriate shielding and automatic timing devices, and all proposed lighting would be required to have dark sky compliance certification. Therefore, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

II. **AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Would the project:

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

No Impact. The project site is designated Specific Plan and is located in the Southern Entry District (mixed-used overlay) of the Southern Centre City Parkway Specific Plan. The proposed project would be consistent with both the General Plan designation and local zoning code. The project site does not contain any active agricultural uses, agricultural resources, or timberland. 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. There are no Williamson Act Contract lands on or near the site. The property and surrounding area are classified as Urban and Built-Up Land by the California Department of Conservation Farmland Mapping and Monitoring Program and are not listed as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (State of California Department of Conservation 2018). Similarly, the project site and surrounding area are not listed as prime Agricultural Lands in the City's General Plan (City of Escondido 2012a). Therefore, the project would not result in the conversion of agricultural resources to non-agricultural use, or result in the conversion of forest land to non-forest use. No impact would occur.

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

No Impact. See response provided for II.a. No impact would occur.

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

No Impact. See response provided for II.a. No impact would occur.

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

No Impact. See response provided for II.a. No impact would occur.

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

No Impact. See response provided for II.a. No impact would occur.

III. **AIR QUALITY.** Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

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

Less Than Significant Impact. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 United States Code 7409], the U.S. Environmental Protection Agency (EPA) developed primary and secondary National Ambient Air Quality Standards (NAAQS). The San Diego Air Basin (SDAB) is designated nonattainment for the federal 8-hour ozone (O_3) standard. The California Air Resources Board (CARB) has developed the California Ambient Air Quality Standards (CAAQS) and generally has set more stringent limits on the criteria pollutants than the NAAQS. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. The SDAB is a non-attainment area for the state ozone (O_3) standards, the state 10-micron particulate matter (PM_{10}) standard, and the state 2.5-micron particulate matter ($PM_{2.5}$) standard. The California State Implementation Plan (SIP) is a collection of documents that sets forth the state's strategies for attaining the NAAQS. The San Diego Air Pollution Control District (SDAPCD) is the agency responsible for preparing and implementing the portion of the California SIP applicable to the SDAB. The SDAPCD prepared the Regional Air Quality Study (RAQS) to prepare its portion of the SIP and in response to the requirements set forth in the California CAA AB 2595 (SDAPCD 1992) and the federal CAA. As part of the RAQS, the SDAPCD identified transportation control measures (TCM) for the air quality plan prepared by the San Diego Association of Governments (SANDAG). The RAQS and TCM set forth the steps needed to accomplish attainment of NAAQS and CAAQS. The required triennial updates of the RAQS and corresponding TCM were adopted in 1995, 1998, 2001, 2004, 2009, and most recently in December 2016.

The RAQS is the applicable regional air quality plan that sets forth the SDAPCD's strategies for achieving the NAAQS and CAAQS. The SDAB is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gasses (ROG) and nitrogen oxide (NO_X), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and by extension to maintaining and improving air quality.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is designated as Specific Plan (SP) in the City's General Plan, and also within the Southern Entry District (mixed-use overlay) of the South Centre City Specific Plan. The goal of the Mixed Use Overlay Zone is to create districts with a mix of uses to allow residents to live close to jobs, shopping, and entertainment. The project would be consistent with the General Plan land-use designation and South Centre City Specific Plan use and density provisions. Although the project would not include a commercial component, it is located in the vicinity of neighborhood shopping at the intersection of South Escondido Boulevard and Citracado Parkway. The project would be consistent with the growth anticipated in the General Plan. Additionally, as discussed below in Section III.b., project emissions would not exceed the project-level significance thresholds from the City Municipal Code. These thresholds are intended to both define quality of life standards and implement the Growth Management Element of the City's General Plan. The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. Therefore, the project would not obstruct or conflict with implementation of the RAQS, and impacts would be less than significant.

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

Less Than Significant Impact. The region is classified as attainment for all criteria pollutants except ozone, PM_{10}, and $PM_{2.5}$. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NO_X and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone.

The Environmental Quality Regulations, as established in the Escondido Municipal Code Chapter 33 Article 47, establish screening thresholds to determine if additional analysis is required to determine whether a project would result in significant impacts. Section 33-924(G) pertains to air quality impacts. A project would require a technical study if it would exceed the City's emission screening level criteria. Projects that would not exceed the screening level criteria are considered not to have a significant impact related to air quality violations.

Emissions were calculated using the California Emissions Estimator Model 2016.3.2 (CalEEMod; California Air Pollution Control Officers Association 2017) and compared to the City's screening thresholds.

Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related emissions include the following:

- fugitive dust from grading activities;
- equipment exhaust;
- off-gassing from architectural coatings (paints, etc.) and paving; and
- vehicle trips by workers, delivery trucks, and material-hauling trucks.

Construction-related pollutants result from dust raised during grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X, SO_X, and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than do gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Construction emissions were modeled with construction activities beginning in September 2020 and lasting for approximately two years. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The construction equipment estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

Table 1 shows the total projected maximum daily construction emissions for the project. CalEEMod output is provided in Appendix A.

Table 1
Summary of Worst-case Construction Emissions
(pounds per day)

	Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	2	21	15	<1	1	1
Site Preparation	2	18	8	<1	7	4
Grading	1	15	7	<1	6	3
Building Construction	2	15	12	<1	1	1
Paving	1	7	9	<1	<1	<1
Architectural Coatings	2	2	2	<1	<1	<1
Maximum Daily Emissions	**2**	**21**	**15**	**<1**	**7**	**4**
Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*

SOURCE: Escondido Municipal Code Section 33-924(G)
ROG = reactive organic gases; NO_X = nitrogen oxide; CO = carbon monoxide;
SO_X = sulfur oxide; PM_{10} = particulate matter less than 10 microns;
$PM_{2.5}$ = particulate matter less than 2.5 microns

Standard dust control measures would be implemented as a part of project construction in accordance with SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values, and did not take into account the required dust control measures. Thus, the emissions shown in Table 1 are conservative.

As shown in Table 1, project construction would not exceed the City's thresholds of significance. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

Operation

Mobile source emissions would originate from traffic generated by the project. Area source emissions would result from the use of natural gas, consumer products, as well as applying architectural coatings and landscaping activities.

Mobile source operational emissions are based on the trip rate, trip length for each land use type, and size. According to the project traffic report, the project would generate 8 trips per dwelling unit for a total of 336 average daily trips (see Appendix H; LOS Engineering 2019). Based on regional data compiled by CARB as part of the emission factor model, the average regional trip length for all trips in San Diego County is 5.62 miles (CARB 2014). This distance is multiplied by the total trip generation of the project to determine total project annual vehicle miles traveled. Default vehicle emission factors were used.

Area source emissions associated with the project include consumer products, natural gas used in space and water heating, architectural coatings, and landscaping equipment. Hearths (fireplaces) and woodstoves are also a source of area emissions; however, the project would not include hearths or woodstoves. Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents, cleaning compounds, polishes, floor finishes, disinfectants, sanitizers, and aerosol paints but not including other paint products, furniture coatings, or architectural coatings.

For architectural coatings, emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. Emissions are based on the building surface area, architectural coating emission factors, and a reapplication rate of 10 percent of area per year.

Landscaping maintenance includes fuel combustion emission from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers as well as air compressors, generators, and pumps. Emission calculations take into account building area, equipment emission factors, and the number of operational days (summer days).

Table 2 provides a summary of operational emissions for the project.

Table 2
Summary of Project Operational Emissions
(pounds per day)

	Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1	<1	3	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	2	5	<1	1	<1
Total	**2**	**2**	**8**	**<1**	**1**	**<1**
Significance Threshold	*55*	*250*	*550*	*250*	*100*	*55*

SOURCE: Escondido Municipal Code Section 33-924(G)
ROG = reactive organic gases; NO_X = nitrogen oxide; CO = carbon monoxide; SO_X = sulfur oxide; PM_{10}= particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns
[1]Note that ROG and volatile organic compounds are interchangeable in the context of this project analysis.

As shown in Table 2, operation of the project would not exceed the City's thresholds of significance. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (CARB 2005). The project site is adjacent to multi-family residential/condominium uses to the north, a motel to the south and east, single-family residential further to the east, and west across Centre City Parkway.

Construction of the project and associated infrastructure would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Diesel-exhaust diesel particulate matter (DPM) emissions would be generated from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction is anticipated to last for approximately two years. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were two years, the exposure would be 7 percent of the total exposure period used for health risk calculation.

Additionally, with ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced over the years as the project construction continues. Further, all construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation, which limits unnecessary idling to 5 minutes, requires all construction fleets to be labeled and reported to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements. Therefore, due to the limited duration of construction activities and implementation of the In-Use Off-Road Diesel-Fueled Fleets Regulation, DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants (TACs) that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Therefore, project construction would not expose sensitive receptors to substantial pollutant concentration.

Localized carbon monoxide (CO) concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses. The SDAB is a CO maintenance area under the federal CAA. This means that SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing

to meet and maintain air quality standards. As a result, ambient CO levels have declined significantly. CO hot spots have been found to occur only at signalized intersections that operate at or below level of service (LOS) E with peak-hour trips for that intersection exceeding 3,000 trips (County of San Diego 2007). The Transportation Impact Analysis prepared for the project includes anticipated traffic volumes at intersections near the project site. One intersection was found to operate at LOS E and F: South Escondido Boulevard connector at Centre City Parkway. However, peak hour turning volumes would be less than 3,000 vehicles. All other intersections would operate at LOS D or better. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

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

Less Than Significant Impact. The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include single and multi-family residential uses and a motel adjacent to the project site; however, exposure to odors associated with project construction would be short term and temporary in nature. Additionally, CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation outlined above would reduce construction exhaust emissions, which would also reduce construction-related odors. Impacts would be less than significant.

IV. BIOLOGICAL RESOURCES: Would the project:

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

No Impact. The project site contains an abandoned restaurant facility, along with the remains of outdoor amenities, disturbed groundcover, and ornamental landscaping. The project site is mapped Developed and Disturbed Land per the Multiple Habitat Conservation Plan (MHCP; SANDAG 2003) and does not support sensitive or special status species. The project site is surrounded by urban development on all sides and no native or sensitive habitat, stream courses, or wetland habit exists on-site or on adjacent properties. No impact would occur.

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

No Impact. According to the General Plan Resource Conservation Element Vegetation Categories Map (City 2012a), no riparian habitat or other sensitive natural community is located at or adjacent to the project site. See response provided for IV.a. No impact would occur.

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

No Impact. According to the General Plan Resource Conservation Element Vegetation Categories Map (City 2012a), no riparian habitat or other sensitive natural community is located at or adjacent to the project site. See response provided for IV.a. No impact would occur.

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

No Impact. The project site is located within an urbanized environment and surrounded by development on all sides. Neither the project site nor surrounding land uses support wildlife. Therefore, the project site does not function as a wildlife corridor and would not impact undeveloped areas that may support the movement of wildlife. No impact would occur.

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

Less Than Significant Impact. The City Municipal Code – Grading and Erosion Control Ordinance (Chapter 33, Article 55, Section 33-1069) includes vegetation and replacement standards for impacts to mature and/or protected trees. However, there are no protected trees (i.e., oak trees [*Quercus* sp.]) located on-site. Therefore, the project would not conflict with local policies or ordinances. Impacts would be less than significant.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. Escondido is one of seven jurisdictional areas within the northern subregion of San Diego County covered by the MHCP (SANDAG 2003). The MHCP is intended to protect viable populations of native plant and animal species and their habitats, and each of the participating jurisdictions in the program is required to prepare a subarea plan in order to implement the MHCP within its jurisdictional boundaries. The City has prepared a Draft Subarea Plan (City of Escondido 2001), but the Plan has not been adopted. The City's Draft Subarea Plan identifies the project site

as developed and disturbed land and does not identify it for preservation. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, and impacts would be less than significant.

V. CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 (or conflict with applicable historic thresholds specified in City's Zoning Code Article 47)?

Less Than Significant With Mitigation Incorporated. The project site contains an abandoned restaurant that had once been a single-family residence. A Historical Evaluation of the project site and existing structure was conducted by Brian F. Smith and Associates (Appendix B; Brian F. Smith and Associates 2018) in order to determine whether the structure is a significant historic resource, and whether the demolition of the structure would constitute a significant impact.

According to the Historical Evaluation, the structure was designed and built in 1946 by Charles H. Paxton, part owner and operator of the Adobe Brick Manufacturing Company in Escondido and the Adobe Construction Company in La Jolla. Initially, the building was designed as a single-family residence for Charles Paxton, which he used as a model home for the Longview Acres Estates subdivision. The pool and detached garage were completed in 1949. In 1955 Charles Paxton moved out of the structure as his primary residence and in 1962 it was converted into a restaurant. As such, the structures meet the minimum area requirement threshold of 50 years to be considered a historic structure, and therefore, were evaluated for significance.

The structure was evaluated for historical significance using the California Register of Historic Resources (CRHR) criterion and the City's Register criteria. Based on the analysis conducted in the Historical Evaluation, it was determined that the garage would be considered ineligible for listing on the CRHR under any eligibility criteria due to an overall lack of integrity. However, while the garage is ineligible for the City's Register due to an overall lack of integrity, the residential/restaurant building was determined to be eligible for designation on the City's Register under eligibility Criteria 1, 3, 5, and 7 for the following reasons:

- Escondido Criterion 1 is met because of the structure's association with Charles Paxton, who contributed to the development of adobe brick residences in the City in the 1940s and 1950s. The home served as his residence during a majority of the time that he was active in the construction industry in Escondido and also served as the model home for the Longview Acres Estates subdivision.
- Escondido Criterion 3 is met because the structure was constructed using locally sourced adobe bricks manufactured by the Adobe Brick Manufacturing Company, which is no longer in operation, and served as the model home for the Longview Acres Estates subdivision.
- Escondido Criterion 5 is met because the structure is over 50 years of age.
- Escondido Criterion 7 is met because the structure was one of a limited number of residences in the City that were built using adobe bricks.

Based on the criterion met, the Historic Evaluation determined that the structure is considered a historical resource, the loss of which would be considered potentially significant (Impact CUL-1)

An additional evaluation was conducted by the project applicant to determine whether there could be any reasonable alternative to demolition. This includes incorporation of the existing adobe structure and outbuilding into the project design. The result of this alternatives analysis concluded that incorporation of the abobe structure would result in a reduction in the number of units from the proposed 42 to between 24 to 28 units (a reduction of up to 18 units or 57 percent). Reusing the adobe structure for use as a restaurant as a component is not desirable or practical as the site is now privately owned, and there would not be an area to provide suitable seating to support the use as all seating was provided outdoors. In addition, suitable on-site parking would not be available and on-street parking is restricted. Incorporation of the structure as a recreational/open space component of the project also is not practical or reasonable as the previous occupancy type would be changed triggering required upgrades to the structure to conform to current building code standards. Retaining the structure also would significantly reduce the residential density of the project, and would not allow on-site nuisance and hazards associated with the current condition of the structure to be abated.

In addition, the structure was found to be structurally unsound and fails to meet building code requirements for commercial and/or residential structures, specifically earthquake compliance. Specifically the structure fails to meet earthquake compliance due to a lack of structural framing. In order to meet code requirements, the adobe brick walls would need to be reinforced with rebar, which would involve both the deconstruction and the reconstruction of the building to be reinforced or salvaged and new veneer facades attached to a code compliant block would be required to reinforce a new building. The estimated cost for such demolition, salvage, and rebuilding of the 2,725-square-foot building would be approximately $350 per square foot, which would make the proposed project financially infeasible from a total development cost standpoint. Thus, there is no reasonable alternative left to pursue, other than demolition. Demolition of the building would result in a significant impact to a historical resource (Impact CUL-1).

To reduce the potentially significant impact due to the loss of the historic structure, the mitigation measures would be required as conditions of project approval. The mitigation measures, detailed below, are adequate to ensure the loss of the abode structure is recorded as a resource, materials are salvaged and available for historical or archival depositories,

and signage or other interpretive/commemorative reminders are available to the public. These mitigation measures are adequate to reduce the significant impact due to structural changes made to the resource itself. Specifically, modifications made to the building to convert it into a restaurant beginning in 1962 negatively impacted the original design and function of the building by introducing doors into new openings (by removing portions of walls), replacing original doors and windows, removing the northeast corner of the building and adding a flat-roofed, stucco-clad addition. Overall, the modifications made to the building and the property overall have negatively impacted the building's original design, setting, materials, workmanship, and feeling associated with the original residence. This conversion does not represent an important historic event; there was no broad pattern of events in the 1960s that resulted in residential buildings on the outskirts of the City being converted into restaurants.

Thus, the project applicant would be required to conduct the following mitigation measures in order to reduce impacts associated with the demolition of a significant historic resource to a less than significant level.

MM-CUL-1: The project applicant shall ensure Level I or II Historic American Buildings Survey documentation (or equivalent) of the residence be conducted in order to achieve mitigation by exhausting the research potential of the resource.

MM-CUL-2: Salvage Materials. Prior to demolition, distinctive representative architectural elements (interior and exterior features) shall be identified, and if feasible, salvaged for reuse in relation to the proposed plan. If reuse on-site is not feasible, opportunities shall be made for the features to be donated to various interested historical or archival depositories, to the satisfaction of the Director of Community Development.

MM-CUL-3: The project applicant shall work with Planning staff or other qualified professional to institute an interpretive program on-site that references the property's history and the contribution of the historical resource to the broader neighborhood or historic district. An example of an interpretive program may be installation of interpretive signs or commemorative plaques in a publicly accessible and visible location that describe the history of the site must be installed prior to certificate of occupancy. Although implementation of this mitigation measure may reduce impacts on historical resources, it would not lessen the effects to a less than significant level.

Implementation of the mitigation measures **MM-CUL-1 through MM-CUL-3** would reduce the significant impacts associated with the demolition of a historical resource to a less than significant level.

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

Less Than Significant with Mitigation Incorporated. The project site contains existing developed and has been previously graded. However, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would represent a significant impact (Impact CUL-2). Thus, the project applicant would be required to conduct the following mitigation in order to reduce impacts to a less than significant level.

MM-CUL-4: The City Planning Division recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the project location (TCA Tribe) prior to issuance of a grading permit. The purposes of the agreement are: (1) to provide the applicant with clear expectations regarding tribal cultural resources and (2) to formalize protocols and procedures between them. The applicant/owner and the TCA Tribe responsible 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 project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities.

MM-CUL-5: 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-CUL-6: 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-CUL-7: During the initial demolition, 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-CUL-8: 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-CUL-9: 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-CUL-10: If a potentially significant tribal cultural resources and/or unique archaeological resource is discovered, 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-CUL-11: 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-CUL-12: 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 TCA 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-CUL-13: 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.

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

Less Than Significant Impact. Impacts to paleontological resources typically occur during grading activities (excavation) associated with project construction on previously undisturbed land, or redevelopment where much deeper grading or excavation is proposed into the underlying bedrock. Figure 4.5-2 of the City's General Plan Final Environmental Impact Report (EIR) shows that the project site is underlain by granitic and other intrusive crystalline rocks of all ages, mid-Cretaceous, which are identified as having no paleontological resource potential (City of Escondido 2012b). Therefore, impacts related to paleontological resources would be less than significant.

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

Less Than Significant with Mitigation Incorporated. No dedicated cemetery or human remains are known to be present on-site. However, a significant impact could occur in the unlikely event that remains are located on-site (Impact

CUL-3). Thus, the project applicant would be required to conduct the following mitigation in order to reduce impacts to a less than significant level.

See **MM-CUL-11**, under Section V.b. Implementation of **MM-CUL-11** would reduce potential impacts to human remains to a less than significant level.

VI. ENERGY. Would the project:

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

Less Than Significant Impact. Energy use associated with a project typically includes fuel (gasoline and diesel), electricity, and natural gas, and sources include:

- Construction-related vehicle and equipment energy use
- Transportation energy use from people traveling to and from the project area during operation
- Building and facility energy use of the proposed project during operation

Construction-Related Energy Use

Energy use during construction would occur within two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. The project is limited to several building and site upgrades and would not require mass grading or other large construction activities that could consume substantial amounts of fuel or other forms of energy. Based on CalEEMod calculations, project construction would require a maximum of 30 worker vehicle trips per day during building construction activities. All other construction activities would require fewer worker and vendor vehicle trips. CalEEMod output files are presented in Appendix A. Fuel consumption associated with construction worker commute would be similar of any other typical commute in San Diego County, and would not result in a wasteful, inefficient, or unnecessary consumption of gasoline or diesel fuel. Consistent with state requirements, all construction equipment would meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical equipment fuel consumption rates. Additionally, construction activities would be temporary and short-term, and would adhere to all construction best management practices. Therefore, project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Operation-Related Energy Use

During operation, energy use would be associated with transportation-related fuel use (gasoline, diesel fuel, and electric vehicles), and building-related energy use (electricity and natural gas).

Transportation-Related Energy Use

Buildout of the project and occupation by residents would result in transportation energy use. Trips by individuals traveling to and from the project site would result from use of passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas, and could potentially be fueled by electricity. Based on information from the project Traffic Impact Study (see Appendix H), project-generated traffic would account for an additional 336 average daily traffic (ADT). Vehicle emission factors and fleet mix were based on regional averages from the CARB Emission Factors 2014 model. Based on regional data compiled by CARB as part of Emission Factors 2014 model, the average regional trip length for all trips in San Diego County is 5.62 miles (CARB 2014). Thus, the project would generate 1,888 daily vehicle miles traveled (VMT) and 689,237 annual VMT. Total gasoline and diesel fuel consumption was calculated using EMFAC2014 fuel consumption rates and fleet data for light duty autos. The results are summarized in Table 3.

Table 3 Vehicle Fuel/Electricity Consumption					
Fuel Type	Daily VMT	Fuel Efficiency (miles per gallon)	Gallons of Fuel per Day	Electric Efficiency (kWh per mile)*	Electric Vehicle kWh per day
Gasoline	1,827	28.20	65	--	--
Diesel	21	35.62	<1	--	--
Electric	41	--	--	3.4	12
TOTAL	**1,888**		**65**		**12**
kWh = kilowatt hour; VMT = vehicle miles traveled. *EMFAC does not provide estimates for energy used by electric vehicles. This data was estimated using existing kWh/mile data and estimates of future electric vehicle efficiencies provided by the Federal Highway Administration.					

Project fuel consumption would decline over time beyond initial operational year of the project as a result of continued implementation of increased federal and state vehicle efficiency standards. There is no component of the project that would result in unusually high vehicle fuel use during operation. As such, operation of the project would not create a land use pattern that would result in wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

Non-Transportation-Related Energy Use

The Renewables Portfolio Standard (RPS) promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by Executive Orders (EOs) S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, Senate Bill (SB) 2 (1X) codified California's 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California's renewable energy mix goal to 50 percent by year 2030. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. The project would be served by San Diego Gas & Electric (SDG&E). As of 2017, SDG&E had a 32 percent procurement of renewable energy (California Public Utilities Commission [CPUC] 2017).

The California Code of Regulations, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to greenhouse gas (GHG) reductions are the California Building Code's energy efficiency and green building standards as outlined below.

Title 24, Part 11 of the California Code of Regulations is CALGreen. Beginning in 2011, CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- inspections of energy systems to ensure optimal working efficiency;
- low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards;
- dedicated circuitry to facilitate installation of electric vehicle charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- installation of electric vehicle charging stations for at least three percent of the parking spaces for all new multi-family developments with 17 or more units.

Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. The water use compliance form must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

Electricity and natural gas service to the project site is provided by SDG&E. The proposed residential units would use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating

demand. Residential uses would likely require the most energy use in the evening as people return from work. As a part of the air quality and GHG modeling prepared for the project, CalEEMod was used to estimate the total electricity and natural gas consumption associated with the project. Table 4 summarizes the anticipated energy and natural gas use.

Table 4
Electricity and Natural Gas Use

	Total Use
Electricity	168,207 kWh/Year
Natural Gas	854,814 BTU/Year
kwH = kilowatt hour BTU = British thermal units	

Buildout of the project would result in an increase of electricity and natural gas usage when compared to the existing condition. The project would be required to meet the mandatory energy requirements of CALGreen and the California Energy Code (Title 24, Part 6 of the California Code of Regulations) and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water-heating systems, and lighting. Further, electricity would be provided to the project by SDG&E, which currently has an energy mix that includes 32 percent renewables and is on track to achieve 50 percent by 2030 as required by RPS. Therefore, there are no project features that would support the use of excessive amounts of energy or would create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

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

Less Than Significant Impact. The applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and RPS. As discussed under Section VI.a. above, the project would be required to meet the mandatory energy requirements of CALGreen and the California Energy Code. The project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SDG&E's implementation of RPS. Impacts would be less than significant.

VII. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. A Geotechnical Investigation was completed for the proposed project (Appendix C; Construction Testing & Engineering, Inc. [CTE] 2019). As detailed in the Geotechnical Investigation, the project site is not located within a known Alquist-Priolo earthquake fault zone or other faults identified within the City. Therefore, the risk of earthquake ground rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in a seismically active southern California region and is located approximately 24.8 miles from the Rose Canyon Fault. The most significant seismic hazard at the site is shaking caused by an earthquake occurring on a nearby or distant active fault. However, the project site is not considered to possess a significantly greater seismic risk than that of the surrounding area. Conformance with the California Building Code (CBC) guidelines that are currently adopted by the City would ensure that potential impacts related strong seismic shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Figure VI-6 of the City General Plan Community Protection Element shows that the project site is not located within an identified liquefaction hazard area. Conformance with the CBC guidelines that are currently adopted by the City would ensure that potential impacts related to ground failure would be less than significant.

iv. Landslides?

No Impact. The project site and surrounding area is generally flat and consists of urban development. Figure VI-6 of the City General Plan Community Protection Element shows that the project site is not located near any slopes greater than 25 percent nor is it located within an area identified as having soil subject to landslide. In addition, the

Geotechnical Investigation stated that no landslides have been mapped within he project site, and no landslide potential was observed during the field exploration of the site. No impact would occur.

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

Less Than Significant Impact. The project site is relatively flat and consists of an abandoned restaurant with associated concrete flatwork, landscaping, utilities and other minor improvements. The project would include grading and construction activities as well as landscaping. As indicated under Section IX, Hydrology and Water Quality, the project would implement best management practices (BMPs) during construction and operation in compliance with regulations. Therefore, implementation of the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

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

Less Than Significant Impact. Figure VI-6 of the City General Plan Community Protection Element shows that the project site is not located near any slopes greater than 25 percent nor is it located within an area identified as having soil subject to landslide. Figure VI-6 of the City General Plan Community Protection Element shows that the project site is not located within an identified liquefaction hazard area. Figure 4.6-5 of the City's General Plan Final EIR shows that the project site is not located within an area identified as having expansive soils (City of Escondido 2012b). Conformance with the CBC guidelines that are currently adopted by the City would ensure that potential impacts related to soil stability would be less than significant.

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

Less Than Significant Impact. Figure 4.6-5 of the City's General Plan Final EIR shows that the project site is not located within an area identified as having expansive soils (City of Escondido 2012b). Conformance with the CBC guidelines that are currently adopted by the City would ensure that potential impacts related to expansive soil would be less than significant.

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

No Impact. The project would connect with the existing City wastewater and sewer system and would not use septic tanks or an alternative wastewater disposal system. No impact would occur.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (or conflict with applicable greenhouse gas emissions thresholds specified in City of Escondido Zoning Code Article 47)?

Less Than Significant Impact. Increases in concentrations of GHG emissions generated by human activities result in global climate change impacts. GHGs include carbon dioxide (CO_2), methane (CH_4), NO_X, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Common activities that generate GHGs include vehicular travel, electricity use, natural gas use, water use, and waste generation.

Global climate change could indirectly result in physical environmental impacts related to: extreme heat days; higher concentrations, frequency and duration of air pollution; an increase in wildfires; more intense coastal storms; sea level rise; impacts to water supply and water quality through reduced snowpack and saltwater influx; public health impacts; impacts to near-shore marine ecosystems; reduced quantity and quality of agricultural products; pest population increases, and altered natural ecosystems and biodiversity. Various regulations and policies have been adopted globally, federally, and on a state level to address GHG emissions and associated climate change impacts.

The City has prepared the Escondido Climate Action Plan (E-CAP) demonstrating how the City would reduce GHG emissions. The E-CAP establishes a screening threshold level of 2,500 metric tons of CO_2 equivalent (MT CO_2E) per year for identifying projects that require a project-specific technical analysis to quantify and mitigate project emissions (City of Escondido 2013). The City has determined that new development projects emitting less than 2,500 MT CO_2E annual GHG would not contribute considerably to cumulative climate change impacts. For projects that exceed the 2,500 MT CO_2E screening threshold, further analysis with respect to the City's GHG Guidance is required.

GHG emissions associated with the project include construction (off-road vehicles), mobile (on-road vehicles), energy (electricity and natural gas), area (landscape maintenance equipment), water and wastewater, and solid waste. GHG emissions associated with construction and operation of the project were calculated using the CalEEMod program.

Construction

Construction activities emit GHGs primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in on-road construction vehicles and the commute

vehicles of the construction workers. Construction emissions were modeled using the parameters discussed in Section III.b. Based on guidance from the South Coast Air Quality Management District (SCAQMD), total construction GHG emissions resulting from a project should be amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of a project (SCAQMD 2009).

Vehicles

GHG emissions from vehicles come from the combustion of fossil fuels in vehicle engines. The vehicle emissions are calculated based on the vehicle type and the trip rate for each land use. The vehicle emission factors and fleet mix used in CalEEMod are derived from CARB's 2014 Emission Factors model. Vehicle trip parameters are discussed in Section III.b.

Energy Use

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's operation. Combustion of fossil fuel emits criteria pollutants and GHGs directly into the atmosphere. When this occurs in a building, this is considered a direct emissions source associated with that building. Energy consumption values are based on the CEC sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies, which identify energy use by building type and climate zone. Because these studies are based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 Building Codes. CalEEMod 2016.3.2 is based on the 2016 Title 24 energy code (Part 6 of the Building Code).

The project would be served by SDG&E. Therefore, SDG&E's specific energy-intensity factors (i.e., the amount of carbon dioxide, methane, and nitrous oxide per kilowatt-hour) are used in the calculations of GHG emissions. To account for the effects of the RPS, the default energy-intensity factors included in CalEEMod were adjusted to account for SDG&E's current renewable energy procurement of 43.2 percent (CPUC 2017).

Area Sources

Area sources include GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. The landscaping equipment emission values were derived from the 2011 In-Use Off-Road Equipment Inventory Model (CARB 2011).

Water and Wastewater

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH_4 and N_2O. The project would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, in order to demonstrate compliance with CALGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for the project. In addition to water reductions under CALGreen, the GHG emissions from the energy used to transport the water are affected by RPS. As discussed previously, to account for the effects of RPS the energy-intensity factors included in CalEEMod were adjusted to reflect 43.2 percent renewable energy.

Solid Waste

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, the total volume of solid waste was calculated using waste disposal rates identified by California Department of Resources Recycling and Recovery. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change method, using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters. According to a CalRecyle report to the California Legislature, as of 2013 California has achieved a statewide 50 percent diversion of solid waste from landfills through "reduce/recycle/compost" programs (CalRecycle 2015). However, AB 341 mandates that 75 percent of the solid waste generated be reduced, recycled, or composted by 2020. Therefore, to account for the continuing actions of recycling requirements under state law (i.e., AB 341), a 25 percent solid waste diversion rate was included in the model.

Existing GHG Emissions

The project site was previously developed as a restaurant. When the restaurant was operational, sources of GHG emissions included vehicles, energy use, area sources, water and wastewater generation, and solid waste disposal. However, the restaurant is no longer operational. Therefore, the project site is not a current source of measurable GHG emissions.

Project GHG Emissions

Table 5 summarizes the total project GHG emissions. GHG emission calculation output is provided as Appendix D.

Table 5 Worst-case Project Greenhouse Gas Emissions (MT CO_2E per Year)	
Emission Source	Project GHG Emissions
Vehicles	248
Energy Use	52
Area Sources	1
Water Use	13
Solid Waste Disposal	7
Construction	10
TOTAL	330
NOTE: CalEEMod calculations (Appendix D).	

As shown in Table 5, the project would result in a total emission of 330 MT 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, GHG impacts associated with the project would be less than significant.

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

Less Than Significant Impact. AB 32 codified the 2020 goal of reducing statewide GHG emissions to 1990 levels and launched the Climate Change Scoping Plan that outlined the reduction measures needed to reach these targets. Following the state's adopted AB 32 GHG reduction target, the City set a goal to reduce emissions back to 1990 levels by the year 2020. The City's E-CAP was prepared to demonstrate how this would be achieved. The E-CAP's target goal is to reduce GHG emissions by 15 percent below existing levels by 2020 (City of Escondido 2013). The E-CAP includes GHG inventories for 2010 and GHG forecasts for 2020 and 2035. The E-CAP identifies local measures to reduce transportation, energy, area source, water, solid waste, and construction emissions in 2020. Local GHG reductions would come from improvements to residential and commercial building energy efficiency (45.8 percent), revised land use policies, increased public transportation (33.9 percent), and implementation of a waste disposal program (18.1 percent).

As the project would generate emissions below the screening threshold of 2,500 MT CO_2E per year, it would not conflict with implementation of the E-CAP or interfere with the City's ability to achieve the GHG reduction goals outlined in the E-CAP, nor would it conflict with the AB 32 mandate for reducing GHG emissions at the state level.

EO S-3-05 establishes an executive policy of reducing GHG emissions to 80 percent below 1990 levels by 2050. Consistent with this policy, the California Legislature adopted AB 32, which codifies a GHG emissions reduction target of 1990 emission levels by 2020, and SB 32, which codifies a GHG emissions reduction target of 40 percent below 1990 emission levels by 2030. The 2050 emission reduction target of EO S-3-05 has not been codified by the California Legislature.

The 2,500 MT CO_2E threshold is based on the 90th percentile capture rate concept. Following rationale presented in CAPCOA's Guidance CAPCOA 2008), aggregate emissions from all projects with individual annual emissions that do not exceed the 90th percentile capture rate, would not impede achievement of the state reduction targets and would, therefore, be less than cumulatively considerable.

Further, the project's 2022 emissions represent the maximum emissions inventory for the project, as project emissions would continue to decline through at least 2050 due to regulatory requirements. Given the reasonably anticipated decline in project emissions, due to existing regulatory programs, once the project is fully constructed and operational, the project emissions would continue to decline in line with the GHG reductions needed to achieve the 2030 GHG emissions reduction target and the EO's horizon-year (2050) goals. Therefore, the project would not conflict with the long-term GHG policy goals of the state. As such, the project's impacts with respect to the state's 2020 and 2030 targets, or the state's post-2030 GHG emissions goals under EO S-3-05 would be less than significant.

The project would not conflict with any state plan, policy, or regulation aimed at reducing GHG emissions from land use and development. Impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

Less Than Significant Impact. Project construction activities may involve the use of lubricating oils, paints, solvents, and other materials. Operation and maintenance of the project may involve other regulated common hazardous materials, although acutely hazardous materials would not be used. Project activities during construction and operation would be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use, transport, and disposal of hazardous materials, and impacts would be less than significant.

Although no hazardous materials are known to occur on-site, due to the age of the structures, there is the potential for asbestos or lead-based paint to be identified during demolition of the existing structures. An inspection for asbestos and lead-based paint would be required as a project condition prior to demolition of the existing on-site structures; should asbestos and/or lead-based paint be discovered, remediation would be conducted pursuant to the applicable local, state, and federal regulatory requirements. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. See response provided for Section VIII.a. Impacts would be less than significant.

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

Less Than Significant Impact. The Escondido KinderCare is located approximately 0.2 mile north of the project site. However, the use and handling of hazardous materials during construction and operation would be conducted consistent with all applicable regulations (see Section VIII.a., above). Therefore, impacts related to hazardous emissions within 0.25 mile of a school would be less than significant.

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

Less Than Significant Impact. An environmental database record search was completed for the project site and all surrounding areas within a 0.25-mile buffer using the GeoTracker and EnviroStor databases. The project site and structures immediately adjacent structures were not identified as having hazardous materials in wither database. The GeoTracker database, which is the State Water Resources Control Board data management system for managing sites that impact groundwater, identified two open cases within 0.25 mile of the project site. The property at 2690 South Escondido Boulevard, approximately 0.25 mile south of the project site, is identified as a leaking underground storage tank site but is listed as closed as of January 30, 2003. The property at 2500 South Escondido Boulevard located approximately 0.2 mile north of the project site is identified as a leaking underground storage tank site and is listed as closed as of March 15, 2007. As such, the project site would not be affected by potential contaminants at this site due to the distance to the property and the fact that any contamination present would be handled under the appropriate regulatory oversight and ultimately remediated. The EnviroStor database maintained by the California Department of Toxic Substances Control that provides a list of hazardous substance release sites did not identify any open cases within 0.25 mile of the project site. Therefore, impacts related to hazardous materials sites would be less than significant.

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

No Impact. The project site is not located within 2 miles of a private or public airstrip. The nearest public airport is McClellan-Palomar Airport, which is located approximately 10 miles to the west. The nearest private airstrip is Lake Wohlford Resort Airport, which is located approximately 7 miles to the northeast. The project site is not located within any airport land use compatibility plan. No impact would occur.

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

No Impact. See response provided in VIII.e. No impact would occur.

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

No Impact. Figure VI-1 of the General Plan Community Protection Element identifies two roadways adjacent to the project site as emergency evacuation routes: Centre City Parkway, and Escondido Boulevard as evacuation routes. However, the project would not physically alter these existing evacuation routes, nor would it conflict with the goals and policies of the General Plan Community Protection Element. The proposed development is not expected to result in the need for additional emergency and fire facilities. Any development of the site would be required to comply with all applicable Fire, Building, and Health and Safety Codes. Therefore, the project would not impair or physically interfere with emergency response or evacuation plans. No impact would occur.

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

Less Than Significant Impact. Figure VI-6 of the City General Plan Community Protection Element identifies the project site as having a high wildfire risk. However, the project site is located in an urbanized environment and is not bordered by any undeveloped lands that could be susceptible to wildland fires. Furthermore, the project would comply with City Fire Department standards. Therefore, impacts related to the exposure of people or structures to wildfire risk would be less than significant.

X. HYDROLOGY AND WATER QUALITY. Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Masson & Associates, Inc. prepared a Storm Water Quality Management Plan for the project site (Appendix E; Masson & Associates, Inc. 2019a). The project site is located in the Carlsbad Hydrologic Unit. Storm water from the project site drains onto South Escondido Boulevard via surface flow to an existing drainage ditch located on the south portion of the site. This ditch discharges runoff onto South Escondido Boulevard and then into an existing storm drain system located on South Escondido Boulevard to Kit Carson Creek into Lake Hodge Reservoir. From there, water drains into the San Dieguito River out to the Pacific Ocean.

Kit Carson Creek, Lake Hodges, San Dieguito River, and the Pacific Ocean are listed on the Clean Water Act Section 303(d) list for the following pollutants: pentachlorophenol, color, manganese, mercury, nitrogen, phosphorus, turbidity, pH, enterococcus, fecal coliform, toxicity, and total dissolved solids. The project would decrease the amount of runoff entering Kit Carson Creek and Lake Hodges by 0.9 cubic feet per second (cfs) for the 50-year rainfall event with the inclusion of one biofiltration basin located within he project site.

To address the potential pollutants of concern, the project would implement construction and post-construction BMPs in compliance with the City and Regional Water Quality Control Board (RWQCB) regulations. Typical construction BMPs are anticipated to include silt fencing, gravel bag barriers, street sweeping, solid waste management, stabilized construction entrance/exits, water conservation practices, and spill prevention and control. The project would be required to comply with the drainage and water quality regulations in place at the time of construction. The project would also include operational BMPs by constructing an on-site biofiltration basins in order to remove pollutants from runoff. Additionally, the project would implement source control and site design BMPs, as required by the City's Storm Water Design Manual. Implementation of these BMPs, along with regulatory compliance, would preclude any violations of applicable standards and discharge regulations. Therefore, the project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The project would obtain its water supply from the Escondido Water and Wastewater Division and would not use groundwater supply for any purpose. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a less than significant impact.

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

Less Than Significant Impact. There are no natural hydrologic features on the project site such as watercourses, seeps, springs, or wetlands. The site runoff currently drains onto South Escondido Boulevard via surface flow and an existing ditch located on the south portion of the site from east to west. The existing ditch discharges the runoff onto south Escondido Boulevard and then into an existing storm drain system located on South Escondido Boulevard and ultimately into Lake Hodge reservoir. Construction BMPs would be implemented for the project in compliance with regulations, as detailed in response IX.a.

The project would construct one on-site drainage basin. The proposed drainage basin would drain southeasterly via a proposed roof drain, curb gutter into the proposed treatment basin and then discharge into South Escondido Boulevard prior to discharging into an existing storm drain system located on South Escondido Boulevard downstream of the project site. All the proposed runoff will ultimately discharge onto Lake Hodge Reservoir.

As detailed in the Preliminary Drainage Study prepared for the project, construction of the on-site biofiltration basin and redirection of flows to this basin would reduce the peak 50-year storm event flow rate from 4.9 cfs to 4 cfs (Appendix F, Masson and Associates, Inc. 2019b). Therefore, the project would not substantially alter the drainage pattern of the site or the surrounding area in a manner that could result in substantial erosion, and impacts would be less than significant.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed in response to IX.c., the project would reduce the peak 50-year storm event flow rate from 4.9 cfs to 4 cfs. Therefore, the project would not alter the course of a stream or river or substantially increase the rate or amount of surface runoff in a manner that would result in flooding. A less than significant impact would occur.

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

Less Than Significant Impact. As discussed in response to IX.c., the project would reduce the peak 50-year storm event flow rate from 4.9 cubic cfs to 4 cfs. Therefore, the project would not exceed capacity of storm water drainage systems or provide substantial sources of polluted runoff. A less than significant impact would occur.

f. Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303 (d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired? Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in responses to IX.a., Kit Carson Creek, Lake Hodges, San Dieguito River, and the Pacific Ocean are listed as an impaired water bodies on the Clean Water Section 303(d) list. Standard BMPs would be implemented during construction and post-construction in compliance with the City and RWQCB regulations to adequately control and treat pollutants. The project would introduce one on-site biofiltration basin that would filter pollutants and decrease flow velocity before the runoff is released off-site. Therefore, the project would not result in an increase in any pollutant for which the water body is already impaired, exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

g. Otherwise substantially degrade water quality?

Less Than Significant Impact. The project would comply with all storm water quality standards during and after construction and would implement appropriate BMPs to capture and treat pollutants, including one permanent on-site biofiltration basin. Therefore, the project would not substantially degrade water quality, and impacts would be less than significant.

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

No Impact. The project site is not located within the 100-year floodplain and does not propose housing. No impact would occur.

i. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The project site is not located within the 100-year floodplain. No impact would occur.

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

No Impact. The project would not expose people or structures to a significant flooding hazard, as the project site is not located within a dam inundation area. No impact would occur.

k. Inundation by seiche, tsunami, or mudflow?

No Impact. The risk associated with tsunami is negligible due to the project site's elevation above sea level and distance of approximately 14 miles from the Pacific Ocean. There would be no risk associated with seiche because the project site is not located near a lake or other large body of water. There would be no risk associated with mudflow because the project site and surrounding area is generally flat and consists of urban development. No impact would occur.

XI. LAND USE PLANNING. Would the project:

a. Physically divide an established community?

No Impact. The project site is designated Specific Plan and is located in the Southern Entry District (mixed-use overlay) of the South Centre City Specific Plan. The proposed multi-family development would be consistent with both the General Plan designation and zoning code. The project site is surrounded by other residential uses, including multi-family housing directly to the north, a hotel to the south and east, and single-family residences further to the east, across Cranston Drive. The project would not physically impact any of the existing uses within the surrounding properties. The project would not create any new land use barriers or otherwise divide or disrupt the physical arrangement of the surrounding established community. No impact would occur.

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

Less Than Significant Impact. The project site is designated Specific Plan and is located in the Southern Entry District of the South Centre City Specific Plan. The proposed multi-family development would be consistent with both the General Plan designation, Southern Entry District and local zoning code. The project would be consistent with designated uses as

called for under the General Plan and Zoning Code, and as such the growth associated with the project is anticipated by the City General Plan. Therefore, the project would not conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project, and impacts would be less than significant.

C. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Less Than Significant Impact. See response provided for IV.f. No impact would occur.

XII. MINERAL RESOURCES. Would the project:

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

No Impact. The City's General Plan does not identify the project site as an existing or former extraction site. The project site consists of paved parking and ornamental landscaping associated with the existing development and is surrounded by other urbanized development within the South Centre City Specific Plan. Consequently, mineral resource extraction would be infeasible due to the site's zoning and land use designation, the relatively small property size, and the urbanized nature of the project site and surrounding land uses. Therefore, implementation of the project would not result in the loss of a known local, regional, or state mineral resource. No impact would occur.

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

No Impact. See response provided in XI.a. No impact would occur.

XIII. NOISE. Would the project result in:

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

Less Than Significant Impact. Existing noise levels in the vicinity of the project site were measured on October 16, 2019. Noise measurements were taken to obtain typical ambient noise levels at the project site and in the vicinity. The weather was warm and sunny. Three short-term measurements were taken, as described below. The primary sources of on-site noise were due to traffic on Centre City Parkway. The measurement locations are shown on Figure 6 and detailed data is contained in Appendix G.

Measurement 1 was located near the western project boundary, approximately 50 feet east of South Escondido Boulevard and 100 feet east of Centre City Parkway. The main source of noise at this location was vehicle traffic on Centre City Parkway. Secondary sources of noise included vehicle traffic on South Escondido Boulevard, bird vocalizations, and residents and the adjacent multi-family development. Noise levels were measured for 15 minutes. The average measured noise level was 61.2 dB(A) L_{eq} (A-weighted decibels average measured noise level).

Measurement 2 was located near the southeastern project boundary adjacent to the existing motel. The main source of noise at this location was vehicle traffic on Centre City Parkway. Secondary sources of noise included vehicle traffic on South Escondido Boulevard, motel mechanical equipment, and bird vocalizations. Noise levels were measured for 15 minutes. The average measured noise level was 54.5 dB(A) L_{eq}.

Measurement 3 was located near the northern project boundary adjacent to the existing multi-family residential building. The main source of noise at this location was vehicle traffic on Centre City Parkway. Secondary sources of noise included vehicle traffic on South Escondido Boulevard, bird vocalizations, and residents and the adjacent multi-family development. Noise levels were measured for 15 minutes. The average measured noise level was 52.7 dB(A) L_{eq}.

Construction Noise

Sections 17-234 and 17-238 of the City's Noise Ordinance provide regulations for construction equipment and grading activities. The applicable limits are expressed in terms of dB(A) L_{eq} which is the equivalent steady-state noise level in a stated period of time that is calculated by averaging the acoustic energy over a time period; when no period is specified, a 1-hour period is assumed.

Image Source: Nearmap (flown September 2019)

FIGURE 6

Noise Measurement Locations

RECON

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Section 17-234 (Construction Equipment)

Except for emergency work, the following applies to all construction equipment operating in the City:

a. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays between the hours of 9:00 a.m. and 5:00 p.m., and provided that the operation of such construction equipment complies with the requirements of subsection (c) of this section.
b. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the President, Governor, or City Council as public holidays.
c. No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of 75 dB at any time, unless a variance has been obtained in advance from the City Manager.

Section 17-238 (Grading)

a. It shall be unlawful for any person, including the City of Escondido, to do any authorized grading at any construction site, except on Mondays through Fridays during a week between the hours of 7:00 a.m. and 6:00 p.m. and, provided a variance has been obtained in advance from the City Manager, on Saturdays from 10:00 a.m. to 5:00 p.m.
b. For the purpose of this section, “grading” shall include, but not be limited to, compacting, drilling, rock crushing or splitting, bulldozing, clearing, dredging, digging, filling and blasting.
c. In addition, any equipment used for grading shall not be operated so as to cause noise in excess of a one-hour sound level limit of 75 dB at any time when measured at or within the property lines of any property which is developed and used in whole or in part for residential purposes, unless a variance has been obtained in advance from the City Manager.

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove existing pavement.

A variety of noise-generating equipment would be used during the construction phase of the project, such as excavators, backhoes, front-end loaders, and concrete saws. Construction equipment with a diesel engine typically generates maximum noise levels from 80 to 90 dB(A) L_{eq} at a distance of 50 feet (Federal Highway Administration [FHWA] 2006). Table 6 summarizes typical construction equipment noise levels.

During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Although maximum noise levels may be 85 to 90 dB(A) at a distance of 50 feet, hourly average noise levels would be lower when taking into account the equipment usage factors. For the project, the loudest phase of construction would include dozers, loaders, and excavators. Construction noise levels were calculated based on all three pieces of equipment being active simultaneously. Hourly average noise levels would be 82 dB(A) L_{eq} at 50 feet, or a sound power level of approximately 114 dB(A) from the center of construction activity when assessing the loudest pieces of equipment working simultaneously.

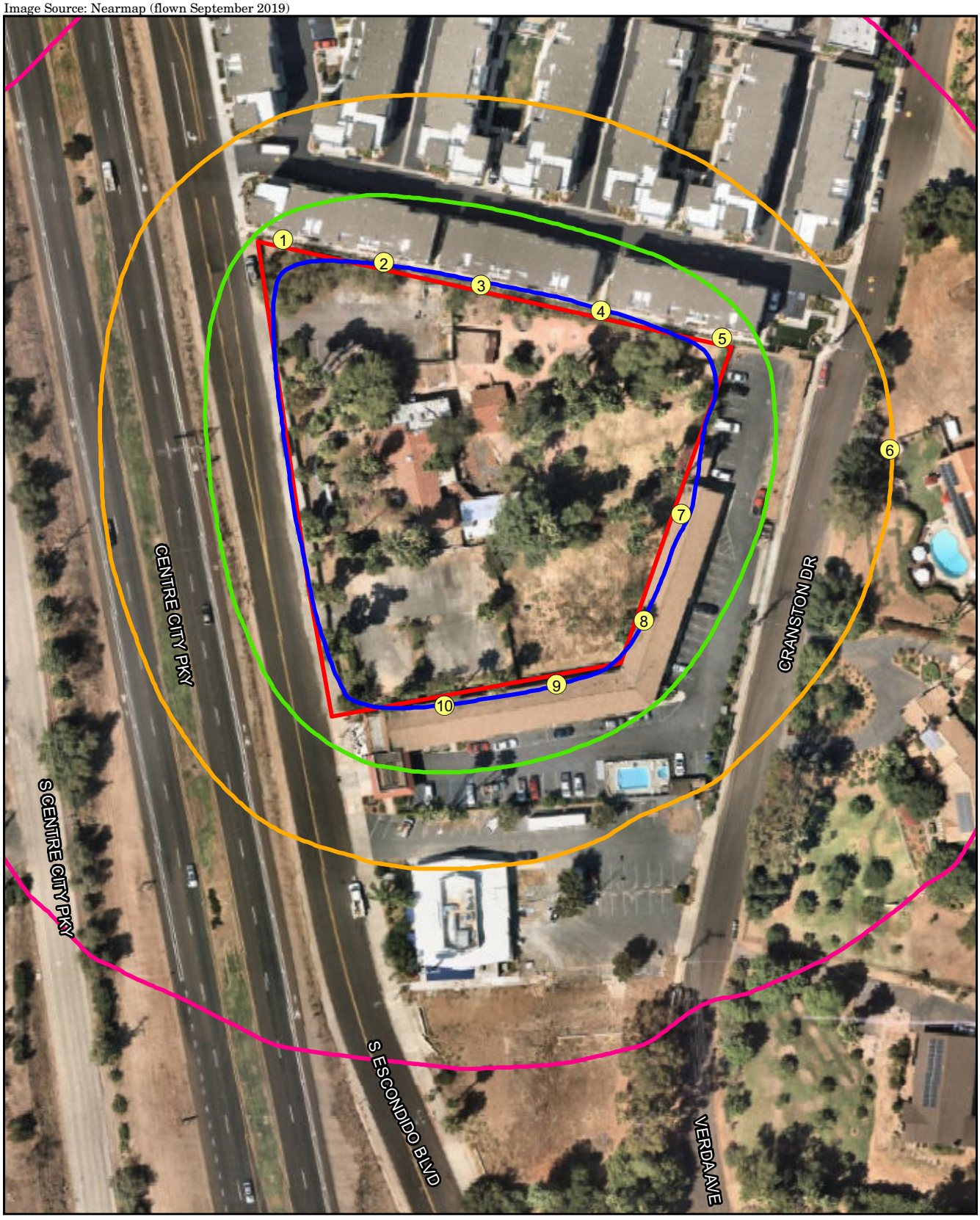
Construction noise is considered a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. Noise level predictions and contour mapping were developed using noise modeling software, SoundPLAN Essential, version 4.1 (Navcon Engineering 2017). To reflect the nature of grading and construction activities, equipment was modeled as an area source distributed over the project footprint. The project site is adjacent to multi-family residential uses to the north, a motel to the south and east, single-family residential further to the east across Cranston Drive, and South Escondido Boulevard and Centre City Parkway on the west. Single-family residential is located further to the west across these Circulation Element roads. Construction noise levels were modeled at 10 receivers located at the adjacent uses. Modeled noise levels are summarized in Table 7. Construction contours are shown in Figure 7. SoundPLAN data is provided in Appendix G.

Table 6 Typical Construction Equipment Noise Levels		
Equipment	Noise Level at 50 Feet [dB(A) L_{eq}]	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt amps or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
In-situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%
SOURCE: FHWA 2006. dB(A)L_{eq} = average equivalent A-weighted decibels		

Table 7 Modeled Construction Noise Levels		
Receiver	Land Use	Construction Noise Level [dB(A) L_{eq}]
1	Multi-Family Residential	72
2	Multi-Family Residential	75
3	Multi-Family Residential	75
4	Multi-Family Residential	75
5	Multi-Family Residential	73
6	Single Family Residential	65
7	Motel	75
8	Motel	75
9	Motel	75
10	Motel	75
dB(A)L_{eq} = average equivalent A-weighted decibels		

As shown, construction noise levels would range from 65 to 75 dB(A) L_{eq} at the adjacent uses. As construction activities would comply with the City Municipal Code Sections 17-234 and 117-238, temporary increases in noise levels from construction activities would be less than significant.

Image Source: Nearmap (flown September 2019)



Receivers

Project Boundary

Construction Noise

60 dB(A) Leq

65 dB(A) Leq

70 dB(A) Leq

75 dB(A) Leq

0 Feet 100

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FIGURE 7

Construction Noise Contours

Traffic Noise

Off-Site Traffic Noise Increases

The City General Plan Community Protection Element states that exterior noise levels for projects that would increase the noise levels 5 dB(A) or greater would have a significant impact and would require mitigation. The project would increase traffic volumes on South Escondido Boulevard. Based on the Transportation Impact Analysis prepared for the project (see Appendix H; LOS Engineering 2019), the project would result in the generation of 336 average daily trips. The increase in noise due to the addition of project traffic on surrounding roadways was calculated by comparing the traffic noise levels in the existing, near-term, and year 2035 conditions with and without the project. The results are summarized in Table 8. As shown, the project would result in a less than 1 dB(A) increase in traffic noise over the existing condition along the studied roadway segments. A change in noise level of 3 dB(A) is considered a barely perceptible amount (California Department of Transportation 2013a), and a change in noise level of 5 dB(A) would require mitigation as indicated in the City's General Plan. Because the project would not result in a 5 dB(A) or greater increase in noise levels, traffic noise impacts would be less than significant.

Table 8
Off-Site Vehicle Traffic Noise Level with and without Project and Ambient Noise Increases (CNEL at 50 feet)

Roadway Segment	Existing		Near-Term		Year 2035		CNEL Increase Over Existing
	Without Project	With Project	Without Project	With Project	Without Project	With Project	
South Escondido Boulevard							
South Escondido Connector to Brotherton Road	63.6	63.6	63.7	63.7	65.5	65.5	1.9
Brotherton Road to Citracado Parkway	62.3	62.3	63.0	63.0	65.5	65.5	3.2
Citracado Parkway to Cranston Drive	57.4	58.3	57.4	58.3	62.0	62.3	4.9

SOURCE: Noise calculations are provided in Appendix G. Traffic volumes obtained from the Transportation Impact Analysis contained in Appendix H.
CNEL = community noise equivalent level

On-Site Traffic Noise Compatibility

CEQA is intended to protect the existing environment from impacts that would result from the proposed project. CEQA does not consider impacts of the existing environment on a proposed land use to be significant. However, the City of Escondido has established noise compatibility standards for siting of new development. A significant land use compatibility impact would occur if the proposed project would expose new residences to noise levels in excess of the noise compatibility standards. Therefore, this potential noise-related land use impact is addressed in this analysis. The City's noise and land use compatibility guidelines are summarized in Table 9.

Table 9
Noise and Land Use Compatibility Guidelines

Land Use Category	Noise Exposure Level			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Single-family, Duplex, Mobile Home	50-60	60-70	70-75	75-85
Residential – Multi-family, Residential Mixed-use	50-65	60-70	70-75	75-85
Transient Lodging, Motels, Hotels	50-65	60-70	70-80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-65	60-70	70-80	80-85
Auditoriums, Concert Halls, Amphitheaters	NA	50-70	65-85	NA
Sports Area, Outdoor Spectator Sports	NA	50-75	70-85	NA
Playgrounds, Parks	50-70	65-75	75-85	NA
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-75	70-80	80-85	NA

SOURCE: City of Escondido 2012a
NA: Level not defined by the City of Escondido General Plan.

As shown, multi-family residential uses are normally acceptable with noise levels ranging from 50 to 65 CNEL, and conditionally acceptable with noise levels ranging from 60 to 70 CNEL. As stated in the General Plan, for conditionally acceptable noise levels, "new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will usually suffice."

Noise level predictions and contour mapping were developed using SoundPLAN. The SoundPLAN program uses the FHWA Traffic Noise Model algorithms and reference levels to calculate traffic noise levels at selected receiver locations. The model uses various input parameters, such as projected hourly average traffic rates; vehicle mix, distribution, and speed; roadway lengths and gradients; distances between sources, barriers, and receivers; and shielding provided by intervening terrain, barriers, and structures.

The main source of noise at the project site is vehicle traffic on Centre City Parkway and South Escondido Boulevard. A future year 2035 with project traffic volume of 3,552 ADT for South Escondido Boulevard was obtained from the Transportation Impact Analysis prepared for the project. The Transportation Impact Analysis did not analyze future volumes on Centre City Parkway. A year 2035 traffic volume for this roadway was obtained from SANDAG traffic projections. Centre City Parkway is currently a 4-lane major roadway, with a circulation element future classification as a 6-lane super major roadway. The SANDAG projections take this future classification into account, and therefore results in a worst-case noise analysis. The future year 2035 traffic volume for Centre City Parkway is 33,100 ADT (SANDAG 2019). South Escondido Boulevard has a posted speed of 35 mph. Centre City Parkway does not have a posted speed, but allows up to 65 mph.

Using these traffic parameters, exterior noise levels were modeled at a series of on-site receivers located at the building facades and exterior use areas. The results are summarized in Table 10. Vehicle traffic noise contours are shown in Figure 8.

Table 10
Future On-Site Vehicle Traffic Noise Levels

Receiver	Traffic Noise Level (CNEL)		
	First-Floor	Second-Floor	Third-Floor
1	66	69	70
2	54	57	58
3	53	55	56
4	48	51	52
5	54	56	57
6	69	71	72
7	69	72	72
8	45	48	57
9	48	50	58
10	36	38	41
11	36	39	41
12	41	44	45
13	49	52	53
14	51	54	55
15	62	64	65
16	57	59	60

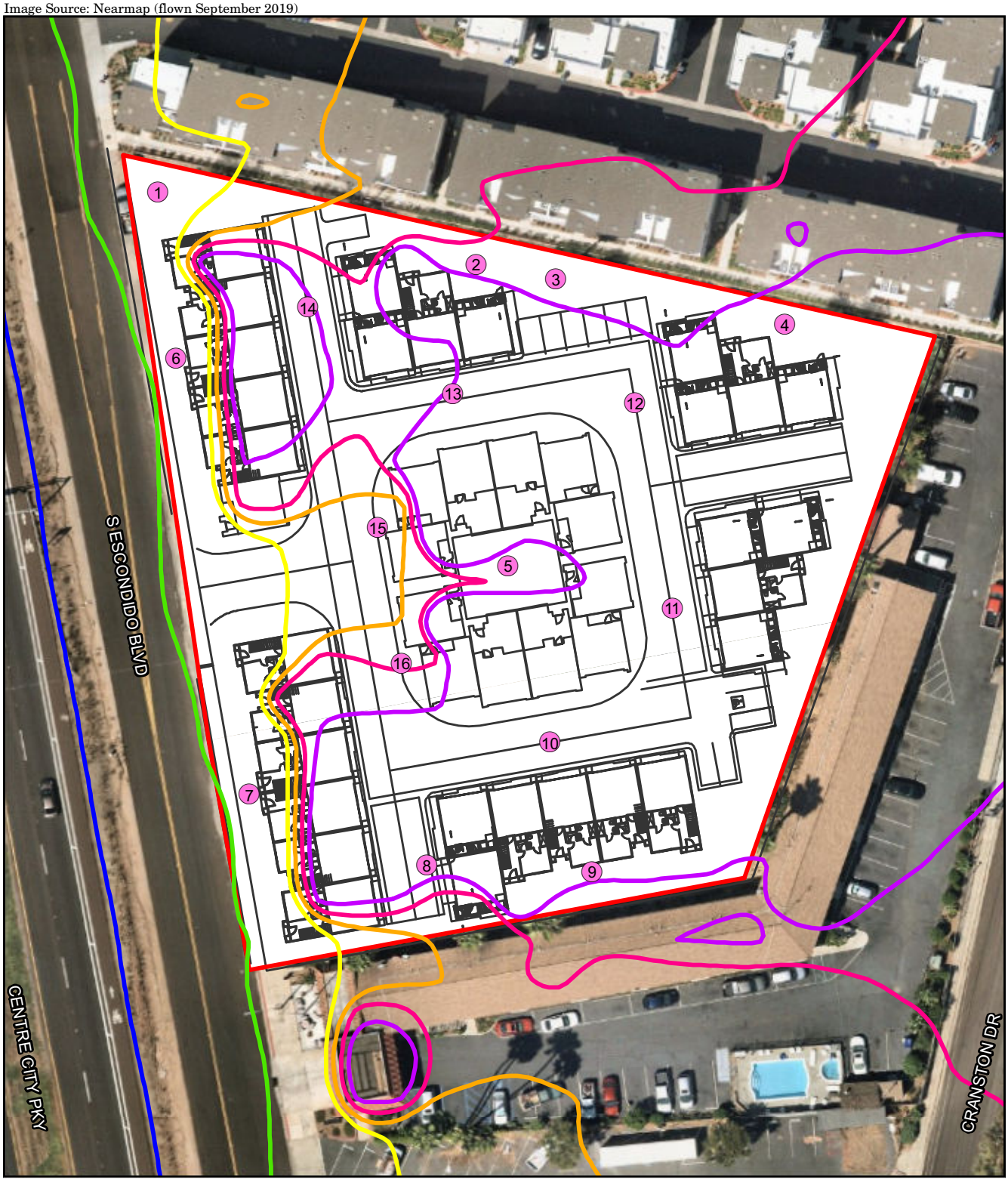
CNEL = community noise equivalent level

Exterior use areas include the seating area and play lawn (Receiver 1), children's play area and tot lot (Receivers 2 and 3), and picnic area (Receiver 4). As shown in Table 10, exterior noise levels at these areas would be 65 CNEL or less and would be normally acceptable with the City's multi-family compatibility standards.

Building façade noise levels would range from 36 to 72 CNEL. In order to be compatible with City standards, interior noise levels would need to be reduced to 45 CNEL or less.

Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the FHWA's Highway Traffic Noise Analysis and Abatement Guidance, light-frame structures with ordinary windows would provide noise level reductions of 20 dB (FHWA 2011). Based on this, interior noise levels would be reduced to 45 CNEL or less when exterior noise levels are 65 CNEL or less. As shown in Table 10, exterior noise levels would be 65 CNEL or less at all receivers except for Receivers 6 and 7. Thus, for all buildings except the two buildings adjacent to South Escondido Boulevard, standard light frame construction with ordinary windows would be sufficient to reduce interior noise levels to 45 CNEL or less, and no analysis of specific building techniques would be required.

Image Source: Nearmap (flown September 2019)



Receivers

Project Boundary

Site Plan

Traffic Noise

50 dB(A) Leq

55 dB(A) Leq

60 dB(A) Leq

65 dB(A) Leq

70 dB(A) Leq

75 dB(A) Leq

0 Feet 60

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FIGURE 8

Vehicle Traffic Noise Contours

For the two buildings located adjacent to South Escondido Boulevard at the western project boundary (Receivers 6 and 7), exterior noise levels would range from 69 to 72 CNEL, a noise level reduction of up to 27 dB(A) would be required to reduce interior noise levels to 45 CNEL or less. The sound transmission class (STC) rating is an integer value that rates how well a building component (e.g., windows, doors, walls, and roofs) attenuates noise. The STC rating general reflects the decibel reduction that a building component can achieve. Therefore, because a noise reduction of 27 dB(A) is required to achieve interior noise levels of 45 CNEL or less, window and door components for the two buildings located adjacent to South Escondido Boulevard would require an STC rating of at least 27.

For all buildings, it will be necessary for the windows to be closed in order to achieve the necessary exterior-to-interior noise reduction, mechanical ventilation is required to move air and control the temperature within the units. Based on the project design and construction plans, mechanical ventilation is included in the project design for all proposed dwelling units.

On-site Generated Noise

The Noise Abatement and Control Ordinance establishes prohibitions for disturbing, excessive, or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens. City exterior sound level limits are the allowable noise levels at any point on or beyond the boundaries of the property on which the sound is produced and corresponding times of day for each zoning designation. The exterior noise level limits between the project site and the adjacent multi-family residential uses are 55 dB(A) L_{eq} between 7 a.m. and 10 p.m. and 50 dB(A) L_{eq} between 10 p.m. and 7 a.m., and the limits between the project site and the single-family residential uses to the east are 50 dB(A) L_{eq} between 7 a.m. and 10 p.m. and 45 dB(A) L_{eq} between 10 p.m. and 7 a.m.

The noise sources on the project site after completion of construction are anticipated to be those that would be typical of any residential complex, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. On-site operations are expected to also involve noise associated with rooftop ventilation, heating systems, and trash hauling. These would be consistent with the noise associated with the existing residences and motel uses adjacent to the project site. Measured noise levels in the area range from about 52.7 to 61.2 dB(A) L_{eq} and operation of the proposed residential use would not be expected to substantially change these levels or result in noise levels that exceed the City's Noise Abatement and Control Ordinance limits.

b. Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. The project does not propose any commercial-type uses that would generate operational groundborne vibration or noise. Construction activities would use standard equipment such as loaders, backhoes, excavators, graders, scrapers, and forklifts. Construction activities produce varying degrees of ground vibration, depending on the equipment and methods employed. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels.

Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. As example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. The ground motion caused by vibration is measured as particle velocity (PPV) in inches per second(in/sec) and is measured in vibration decibels (VdB).Based on several federal studies, the threshold of perception is 0.035 PPV, with 0.24 in/sec PPV being a distinctly perceptible (Caltrans 2013b). Vibration impacts would be significant if they exceed the following Federal Railroad Administration (FRA) thresholds:

- 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches and schools
- 95 VdB for physical damage to extremely fragile historic buildings
- 100 VdB for physical damage to buildings

Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures. The nearest structures to the project site are the multi-family residential building to the north and the motel to the south, both located approximately 10 feet from the project boundary. Large bulldozers would have the greatest potential to generate vibrations that would affect adjacent residential land uses. According to the Federal Transit Administration, vibration levels due to large bulldozers would be 0.089 in/sec PPV at 25 feet (see Table 11). At 10 feet, vibration levels would not exceed the level at which building damage could occur, but could exceed the threshold of 72 VdB for residences and buildings where people normally sleep.

Table 11 Typical Construction Equipment Vibration Levels		
Equipment	PPV at 25 feet (in/sec)	VdB at 10 feet
Large Bulldozer	0.089	95
Loaded Trucks	0.076	94
Jackhammer	0.035	87
SOURCE: Caltrans 2013b. PPV = peak particle velocity; in/sec = inch per second.		

In accordance with Escondido Municipal Code 17-234, construction is permitted only between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and 9:00 a.m. and 5:00 p.m. on Saturday. Construction would not occur during normal sleep hours; however, groundborne vibration may occur frequently during the course of the day, over multiple days throughout the construction period. Therefore, impacts related to groundborne vibration would be potentially significant without mitigation incorporated.

Mitigation Measures NOS-1 and NOS-N-2 would be required to reduce impacts of Groundborne vibration to a less than significant level.

MM-NOS-1: Noise and groundborne vibration construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses to the north. In addition, the use of vibratory rollers and packers should be avoided, as feasible, near sensitive areas.

MM-NOS -2: The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited between the hours of 6:00 p.m. and 7:00 a.m. Monday through Friday, 5:00 p.m. and 9:00 a.m. on Saturday, and all day on Sunday.

Additionally, while construction would occur up to the property edge, the majority of construction would take place in the center of the site, which would be approximately 100 feet from the nearest sensitive receptor. With implementation of mitigation measures N-1 and N-2, impacts would be reduced to less than significant.

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

Less Than Significant Impact. Refer to the analysis provided in XII.a. Impacts would be less than significant.

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

Less Than Significant Impact. Refer to the analysis provided in XII.a. Impacts would be less than significant.

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

No Impact. The project site lies outside of the noise contours for airports in the region and would not expose people to excessive noise levels. No noise impacts due to aircraft noise would occur.

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

No Impact. The project site lies well outside the noise contours for any airports in the region and would not expose people to excessive noise levels. No noise impacts due to aircraft noise would occur.

XIV. POPULATION AND HOUSING. Would the project:

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

Less Than Significant Impact. The project includes the construction of a multi-family development consisting of 42 dwelling units; as such, the project would increase available housing in the City. However, the project site is designated Specific Plan and is located in the Southern Entry District of the South Centre City Specific Plan. Multi-family residential development is an allowed use within the Southern Entry District. The proposed project would be consistent with both the General Plan designation and local zoning code, and as such, the project would not introduce a land use and subsequent population growth that was not already anticipated by the City of Escondido General Plan. In addition, the project would not extend any existing roads or expand existing infrastructure facilities, and it is anticipated that short-term construction jobs and long-term employment jobs would be filled by members of the existing population. Thus, the project would not induce substantial population growth, resulting in a less than significant impact.

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

No Impact. There are no housing units on-site. The existing building was utilized as a restaurant and is no longer used for its original purpose as a single-family home. No existing housing would be displaced and no impact would occur.

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

No Impact. There are no housing units on-site. The existing building was utilized as a restaurant and is no longer used for its original purpose as a single-family home. The restaurant is now vacant. The project would not displace a substantial number of people and no impact would occur.

XV. **PUBLIC SERVICES.** Would the project:

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

i. Fire protection?

Less Than Significant Impact. Fire protection services would be provided by the Escondido Fire Department. Fire Station Number 5 is located approximately 0.7 mile west of the project site at 2319 Felicita Road. This facility supports one paramedic fire engine, one ambulance and one brush engine. The project would increase the need for service in the area by increasing the amount of residential space within the project site. However, this increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. Consistent with the Citywide Facilities Plan, this increase would be offset by the payment of Public Facilities Fees at the time of building permit issuance. In addition, the project would be subject to fire and building review to ensure that the development is in compliance with access and safety standards. Therefore, the project would not require the construction of new fire protection facilities, and impacts would be less than significant.

Ii. Police protection?

Less Than Significant Impact. Police services would be provided from the Police and Fire Headquarters Building located at 1163 North Centre City Parkway, located approximately 4 miles north of the project site. The project would increase the need for additional police service by increasing the amount of residential space on the project site compared to the existing condition. This increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. Consistent with the Citywide Facilities Plan, this increase would be set off by the payment of Public Facilities Fees at the time of building permit issuance. Therefore, the project would not require the construction of new police protection facilities, and impacts would be less than significant.

iii. Schools?

Less Than Significant Impact. The project site is within the Escondido Union School District and the Escondido Union High School District. The project would increase the need for additional school service by increasing the amount of residential space on the project site, and thus increase the potential student population compared to the existing condition This increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. Consistent with the Citywide Facilities Plan, this increase would be set off by the payment of Public Facilities Fees at the time of building permit issuance. Therefore, the project would not require the construction of new police protection facilities, and impacts would be less than significant.

iv. Parks?

Less Than Significant Impact. As a residential use, the project would result in population growth that would increase the demand for, or use of, local parks. However, this increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. The project would be in conformance with Article 18B of Chapter 6 of the City's Municipal Code, which establishes the public facility fees for the City. This article requires that all new residential or nonresidential development pay a fee for the purpose of assuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Impacts would be less than significant.

v. Other public facilities?

Less Than Significant Impact. The project would connect to Escondido Water and Wastewater Division and would result in some increase in water demand and wastewater generation. This increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. Water connection fees and wastewater connection fees would be paid to set off any potential impacts to these services upon issuance of a

building permit. The project would be in conformance with Article 18B of Chapter 6 of the Municipal Code, which establishes the public facility fees for the City. Public facilities fees paid at the time of building permit issuance would contribute to and set off any increase in demand for public services or facilities. As the project would not require the construction of new facilities, impacts would be less than significant.

XVI. RECREATION. Would the project:

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

Less Than Significant. As a residential use, the project would result in population growth that would increase the demand for, or use of, local parks. However, this increase in demand has been accounted for in the General Plan and would not result in the need for new or altered facilities. The project would be in conformance with Article 18B of Chapter 6 of the Escondido Municipal Code, which establishes the public facility fees for the City. This article requires that all new residential or nonresidential development pay a fee for the purpose of assuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Impacts would be less than significant.

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

Less Than Significant Impact. As a residential use, the project would result in population growth that would increase the demand for, or use of, local parks. However, this increase in demand has been accounted for in the General Plan and would not result in the need to construct new or expand existing facilities that might have an effect on the environment. The project would be in conformance with Article 18B of Chapter 6 of the City's Municipal Code, which establishes the public facility fees for the City. This article requires that all new residential or nonresidential development pay a fee for the purpose of assuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Impacts would be less than significant.

XVII. TRANSPORTATION. Would the project:

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

The project is consistent with existing zoning and does not include any changes to the City's existing circulation plan. The project would improve the roadway along the project frontage to include widening along the eastern side of South Escondido Boulevard and the installation of curb, gutter, and sidewalk. A dedicated left-turn lane into the project site also would be striped. These project design features would enhance existing transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The following impact analysis is based on the Draft Vehicle Miles Traveled and Local Transportation Analysis prepared for the project by LOS Engineering, Inc. (Appendix H). The California Governor's Office of Planning and Research (OPR) has identified VMT as the CEQA metric to evaluate a project's transportation impacts. Senate Bill 743 (SB 743) shifted the transportation impact measure of effectiveness from LOS to VMT. As part of the State's CEQA Guidelines, the changes included the elimination of vehicular delay and LOS for determining significant transportation impacts.

Methodology

The City of Escondido Engineering Staff requested the VMT analysis to be based on the local San Diego Institute of Transportation Engineers (ITE) "Guidelines for Traffic Impact Studies in the San Diego Region," May 2019. The project utilized San Diego ITE VMT Guidelines Alternative 1 for determining a minimum project size below which VMT impacts are presumed to be less than significant.

- Alternative 1 is based on the previous SANTEC/ITE Guidelines threshold of defining projects with less than 1,000 ADT and consistent with the zoning as presumed to have less than significant VMT impacts.

Based on direction from City staff, Alternative 1 was applied to this project because the project is in the San Diego region. The trip generation for the 42 multi-family units is calculated to generate 336 ADT as shown in Table 12.

Table 12 Project Trip Generation for VMT Screening			
Proposed Land Use	Rate	Size and Units	ADT
Residential- Multi-family	8/ DU	42 DU	336
SOURCE: Appendix H. DU = dwelling unit; ADT = average daily traffic			

Based on the San Diego ITE Guidelines, the project is presumed to have a less than significant VMT impact due to the trip generation being less than 1,000 ADT.

VMT Analysis

SANDAG adopted the Regional Comprehensive Plan (RCP) for the San Diego region in 2004. The RCP outlines a vision for the San Diego region based on smart growth and sustainability. As part of the RCP, smart growth concept maps were developed showing the locations of existing, planned, and potential smart growth areas. The project is located within smart growth area ES-6 (Community Center). Smart growth area ES-6 encompasses an area of mixed-uses to promote walking/biking between residential and commercial/office uses; thereby, helping reduce VMT. A copy of the SANDAG smart growth concept map is included in Appendix C of the Transportation Analysis.

According to the San Diego ITE Guidelines, the project is presumed to have a less than significant VMT traffic impact because the project trip generation of 336 ADT is less than the 1,000 ADT threshold. Additionally, the project site is located within SANDAG's smart growth area ES-6 that includes mixed uses to promote walking/biking between residential and commercial/office uses to help reduce VMT. Therefore, VMT impacts would be less than significant.

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

Less Than Significant Impact. The project would improve the roadway along the project frontage to include widening along the eastern side of South Escondido Boulevard and the installation of curb, gutter, and sidewalk. A dedicated left-turn lane into the project site also would be striped. The project proposed a multi-family type development that would not introduce any incompatible uses to the area, as the surrounding area includes a mix of residential and commercial uses. Impacts would be less than significant.

d. Result in inadequate emergency access?

No Impact. The project has been designed consistent with City municipal code safety standards. Therefore, the project would not result in inadequate emergency access to or from the project site. No impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less Than Significant With Mitigation Incorporated. AB 52, effective July 1, 2015, introduced the Tribal Cultural Resource (TCR) as a class of cultural resource and additional considerations relating to Native American consultation into CEQA. A TCR may be considered significant if included in a local or state register of historical resources; determined by the lead agency to be significant pursuant to criteria set forth in Public Resources Code §5024.1; is a geographically defined cultural landscape that meets one or more of these criteria; is a historical resource described in Public Resources Code §21084.1, a unique archaeological resources described in Public Resources Code §21083.2; or is a non-unique archaeological resource if it conforms with the above criteria.

A Phase 1 Cultural Resource Survey for the proposed project was conducted by Brian Smith and Associates (BSFA) in December 2019. An archaeological survey was conducted on November 22, 2019 and the results of the survey did not identify any archaeological resources within the subject property. However, two historic structures, constructed as a single-family residence in 1946 and a detached garage in 1949, are present on the property. BFSA also conducted an archaeological records search at the South Coast Information Center (SCIC) at San Diego State University to gather any information regarding recorded cultural resources within or adjacent to the project site. The SCIC records search results indicated that 6 historic addresses and 31 cultural resources site are located within one mile of the property, none of which are within the subject property. BFSA also requested a search of the Sacred Lands File from the Native American Heritage Commission, but as of the date of the report, no response has been received.

In accordance with California State AB 52, the City initiated government-to-government consultation with four tribes including the Rincon Band of Luiseno Indians, San Luis Rey Band of Mission Indians, Soboba Band of Luiseno Indians,

and Mesa Grande Band of Mission Indians through written notification of the proposed project activities. As required under AB 52, letters were sent to the tribes on October 25, 2019. Two Tribes (Rincon and San Luis Rey) responded requesting formal consultation. Formal consultation with the Rincon Tribe was conducted on January 8, 2020 (conference call with Cheryl Madrigal) and with the San Luis Rey Tribe (meeting with Carmen Mojado) on November 19, 2019. The Tribal representatives expressed their agreement in having standard conditions for cultural resources, including archaeological and tribal monitoring during site grading activities to be included as mitigation measures for the project. Therefore, mitigation measures would be required for the project in order to address potential inadvertent discoveries of cultural resources, the content of which are included as mitigation measures CUL-4 through CUL-13 in this IS/MND. Implementation of mitigation measures CUL-4 through CUL-13 would reduce potential impacts to tribal cultural resources to a less than significant level (see Section V.b., Cultural Resources). All tribal correspondence is available for review in the Planning Division project file.

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

Less Than Significant With Mitigation Incorporated. See response to XVII.a. above.

XIX. <u>UTILITIES AND SERVICE SYSTEMS.</u> Would the project:

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

Less Than Significant Impact. The project would be located within an urban setting that has access to water, sewer, electricity, and storm water infrastructure. The project would result in an incremental increase in demand for wastewater treatment. All wastewater would be treated consistent with applicable RWQCB treatment requirements at the City of Escondido Hale Avenue Resource Recovery Facility. Therefore, the project would not exceed applicable RWQCB wastewater treatment requirements, and impacts would be less than significant.

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

Less Than Significant Impact. Regional water planning documents use zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate 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 residential use has been considered in water supply planning documents (e.g., City Urban Water Management Plan), which plan for future water supplies and take into consideration the potential for future drought conditions. Water demand from landscaping would comply with the City's Water Efficient Landscape Regulations (Chapter 33, Article 62 of Municipal Code), which would ensure landscape water efficiency is maximized and low water plants are used. Based on the consistency of the project use with planned land uses, the project would not trigger the need for new entitlements, and impacts would be less than significant.

The project would result in an incremental increase in demand water for wastewater treatment. However, the project would be consistent with growth anticipated by the City General Plan, and would not create unanticipated water or wastewater treatment demand. All wastewater would be treated at the Hale Avenue Resource Recovery Facility, which would have adequate capacity to treat flows associated with the project. Therefore, the project would not require construction or expansion of water or wastewater treatment facilities, and impacts would be less than significant.

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

Less Than Significant Impact. The project includes construction of a biofiltration basin that would reduce the peak 50-year storm event flow rate from 4.9 cfs to 4 cfs (see Section IX.c.). Impacts associated with the construction of the biofiltration basin has been considered throughout the Initial Study/Negative Declaration, and have been determined to be less than significant.

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

Less Than Significant Impact. Escondido Disposal, Inc. is responsible for the collection and disposal of solid waste and recyclables from homes, businesses, and industries in the proposed project area. Residential collection of solid waste by Escondido Disposal is transferred to the Escondido Disposal Transfer Station where it is then taken to either the Sycamore or Otay Mesa Landfill. Project construction would generate solid waste that would be disposed of at regional landfills. The project would minimize construction waste by recycling construction waste when possible. Operational waste would be collected by the Escondido Disposal, Inc. and disposed of at regional landfills. The project would not result in a

need for new or expanded solid waste facilities off-site, and impacts related to solid waste disposal would be less than significant.

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

Less Than Significant Impact. Numerous federal, state, and local regulations exist that are related to solid waste. These include: (1) California Integrated Waste Management Agency, which regulates the management of solid waste within the state; (2) Non-Exclusive Solid Waste Management Agreement, which regulates waste collection in a market-driven business; and (3) the San Diego Integrated Waste Management Plan, which presents strategies to recycle, as well as assist with the siting of solid waste disposal facilities. The project would comply with all regulations related to solid waste such as the California Integrated Waste Management Act and City recycling programs, and impacts would be less than significant.

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

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

No Impact. Per the State of California Board of Forestry and Fire Protection and the City of Escondido General Plan Figure VI-6, the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone. No impact would occur.

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

No Impact. The subject site is located within a High Fire Hazard Zone as indicated on the Wildfire Risk Map for Escondido and Escondido General Plan Community Protection Element (Figure VI-6; City of Escondido 2012a). The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone. The property is not located in proximity to native habitat areas or undeveloped wildland areas. The proposed project would be consistent with Fire Protection Policies 2.14 – 2.17, which specifically pertain to wildland fire. These policies require site design, management practices, removal of overgrown vegetation, and fire-resistant landscaping to prevent wildfire. Therefore, no impact would occur.

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

No Impact. Per the State of California Board of Forestry and Fire Protection and the City of Escondido General Plan Figure VI-6, the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone. No impact would occur.

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

No Impact. Per the State of California Board of Forestry and Fire Protection and the City of Escondido General Plan Figure VI-6, the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone. The project does not include any design features or incompatible uses that would expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, no impact would occur.

XXI. **MANDATORY FINDINGS OF SIGNIFICANCE**

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

Less Than Significant With Mitigation Incorporated. As described in Section IV above, the project site consists of an abandoned restaurant facility, along with the remains of outdoor amenities, disturbed groundcover, and ornamental landscaping. Vegetation on the project site is not designated as sensitive plant species and does not provide habitat for designated sensitive species. Similarly, the project site does not possess any riparian habitat or communities, nor any wetlands, wetland buffer areas, or non-wetland waters of the U.S. Therefore, no impacts to sensitive species, riparian habitat, or wetlands would occur. Potential impacts to the environment as a result of this project are in the areas of cultural/historic, noise and tribal cultural resources. As mitigated, the project is not expected to have any significant impacts, either long term or short term, nor would it cause substantial adverse effects on human beings, either directly or indirectly.

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

Less Than Significant With Mitigation Incorporated. Impacts associated with cultural/historic resources, noise, and tribal cultural resources would be mitigated to a level less than significant. All other project impacts would be less than significant. Consequently, the project would not result in any cumulative impacts on the environment.

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

Less Than Significant With Mitigation Incorporated. As described in Sections III, VIII, and XII above, the project would not result in any substantial adverse direct or indirect impacts to human beings related to air quality or hazards and hazardous materials. Significant impacts associated with noise would be reduced to a less than significant level with implementation of MM-NOS-1 and MM-NOS-2.

d. Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a))?

Less Than Significant With Mitigation Incorporated. Impacts associated with cultural/historic resources and tribal cultural resources would be mitigated to a level less than significant. All other project impacts would be less than significant without mitigation. Consequently, the project would not result in deficiencies relative to the City's General Plan Quality of Life Standards or deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a)).

Material Used in Preparation of this Analysis

Appendices (Under Separate Cover)

A: Air Quality CalEEMod Emission Calculation Output, RECON Environmental, Inc., September, 2019
B: Historic Structure Assessment for 2608 S. Escondido Boulevard, Brian F. Smith and Associates, Inc., June 27, 2018
C: Geotechnical Investigation For Proposed Three-Story Townhome Development 2608 S. Escondido Boulevard, Construction Testing & Engineering, Inc., April 22, 2019
D: Greenhouse Gas CalEEMod Emission Calculation Output, RECON Environmental, Inc., September 2019
E: Storm Water Quality Management Plan For South Escondido, Masson & Associates, Inc., May 28, 2019
F: Final Engineering Drainage Study for South Escondido, Masson & Associates, Inc., May 28, 2019
G: Noise Model Data, RECON Environmental, Inc., September 2019
H: Escondido Multi-Family Development (42 Units) Draft Vehicle Miles Traveled and Local Transportation Analysis, LOS Engineering, Inc., June 17, 2020

Figures

Figure 1: Regional Location
Figure 2: Project Location on USGS Map
Figure 3: Project Location on Aerial Map
Figure 4: Site Plan
Figure 5a: Landscape Plan
Figure 5b: Landscape Plan
Figure 6: Noise Measurement Locations
Figure 7: Construction Noise Contours
Figure 8: Vehicle Traffic Noise Contours

Sources of Information

Brian F. Smith & Associates, Inc.
2018 Historic Structure Assessment for 2608 S. Escondido Boulevard. June.

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2019 Geotechnical Investigation For Proposed Three-Story Townhome Development 2608 S. Escondido Boulevard. April.

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2019a Storm Water Quality Management Plan For South Escondido. May

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2608 South Escondido Boulevard Project IS/MND

Letters of Comment and Responses

The following letters of comment were received from agencies, organizations, and individuals during the public review period (March 16, 2020 through April 5, 2020) of the Draft IS/MND. A copy of each comment letter along with corresponding staff responses is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. Some of the comments received resulted in changes to the IS/MND text. Those changes are shown in strikeout/underline in the Preface to this Final IS/MND.

Letter A

Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

Monday, April 13, 2020

City of Escondido
Planning Division – Jay Paul, Senior Planner
201 North Broadway
Escondido, CA 92025-2798

Re: 2608 South Escondido Boulevard Project - Case No. ENV 19-0007

Mr. Martin,

A-1 After reviewing the Initial Study/Mitigated Negative Declaration (MND) and the Historic Structure Assessment for the Paxton Adobe at 2608 South Escondido Boulevard, Save Our Heritage Organisation (SOHO) finds this unique and significant resource quite intact and eligible for the California Register of Historical Resources (CRHR) under Criteria 1, 2 and 3. As a key link in the continuity of adobe house construction for the entire southwestern region, as well as a model home and office for the Longview Acres Estates subdivision, a MND does not meet the City's legal requirements under the California Environmental Quality Act (CEQA) with regard to this important resource. Potentially subject to a legal challenge, SOHO finds an Environmental Impact Report (EIR) must be prepared to strategize ways of preserve the full adobe building, as well as to devise mitigation that is appropriate for such a significant resource, which warrants more than the typical HABS documentation and salvaging of materials.

Meeting all seven criteria for historical designation by the City of Escondido, 2608 S. Escondido Blvd. is in excellent condition and also eligible for the CRHR under Criteria 1, 2, and 3 at the local and state levels. Therefore, an EIR with flushed out alternatives to retain the full adobe is required under CEQA. Upon evaluating the integrity of this resource within its various periods of significance, or evolutions of use, SOHO finds the Paxton Adobe also continues to retain all seven aspects of integrity.

A-2 Under Criterion 1 of the CRHR, as the model adobe home for an entire development, which stylistically is a strong contributor to Escondido's character, this resource illustrates a significant contribution to the broad patterns of California's heritage at the state level. A key link to the first adobe structures built in Alta California, the Paxton adobe represents a continuation and revival of this important building method and material. Additionally, much of Escondido's post WWII sense of place is predicated on the annual adobe home tour, which highlights the revival of adobe style architecture that became popular in Escondido at the time they were constructed. Additionally significant under Criterion 2, important persons extend well beyond Charles Paxton himself and include people during other significant periods of the building's history. During its initial period of significance-- as a single-family residence, model home, and sales office for the Longview Acres Estates, 1946 through 1959-- other significant persons include Lawrence Green (developer) and Ismael Sanchez (adobe builder). The second period of significance, 1959 through 1962, is when the adobe was operated as nursery by landscape architect Gene Peregov. Adaptively reused as a restaurant beginning in 1962, further important persons include Patrick Brillo Osorio (restaurant owner), Hyrum Arrowsmith (custom adobe home builder), and the Cueva family (Benjamin Sr., Jr., and Esperanza). Additionally eligible under Criterion 3, as a 1946 adobe that remains

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A-1 The requirement for an EIR would not be triggered for this project. As discussed in the IS/MND, mitigation for the loss of the existing structure is appropriate under CEQA. The structures were evaluated for historical significance and it was determined that while the garage is ineligible for the City of Escondido Register due to an overall lack of integrity, the residential/restaurant building was determined to be eligible for designation on the City's Register under eligibility Criteria 1, 3, 5, and 7. Therefore, although it was determined that full preservation would not be required, the demolition of the building would result in a significant impact to a historical resource (Impact CUL-1). However, because impacts to this historical structure could not be practically mitigated by preserving and enhancing the structure in order to ensure compliance with existing regulations, the project applicant would be required to implement mitigation measures which would reduce impacts to less than significant.

Additional details are discussed throughout the responses that follow.

A-2 While the 2608 South Escondido Boulevard building is eligible for designation under City of Escondido Criterion 1 due to the influence that Charles Paxton had upon the mid-century adobe building industry in Escondido, no evidence could be located suggesting that this model home, specifically, contributed "to the broad patterns of California's heritage at the state level" under California Register of Historical Resources (CRHR) Criterion 1. The 2608 South Escondido Boulevard building was constructed in 1946, six years after the period of significance began for the proposed "Mid-20th Century Adobe Thematic Historic District" in La Jolla:

> Adobes identified in La Jolla reflect a renewed appreciation for a method of construction used in early California and indigenous buildings. This local trend was reintroduced by the Weir Brothers, and Charles McCauley who helped land owners build and/or design their own adobes with do-it-yourself adobe brick techniques. During the 1940s, the US Department of Agriculture also promoted adobe and earthen architecture that was suitable for living and low cost to build … Sim Bruce Richards, architect, was known to use adobe in this manner (Donaldson et al. 2004).

A-2 (cont.)

As this trend was already underway prior to 1946, and the establishment of Paxton's building block company occurred between 1942 and 1945 in La Jolla, both prior to Paxton's construction of the 2608 South Escondido Boulevard building, it was not responsible for this movement and is not representative of "A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation" (Andrus and Shrimpton 2002). Therefore, while the 2608 South Escondido Boulevard building is eligible for designation under City of Escondido Criterion 1 due to its association with Paxton and his contributions to the city of Escondido, it is not eligible for designation under CRHR Criterion 1.

As stated in the Historic Structure Assessment for 2608 South Escondido Boulevard (Smith and Stropes 2018):

> Paxton lived in the 2608 South Escondido Boulevard building after it was built and it also functioned as a model home for the Longview Acres Estates adobe brick subdivision. The detached garage originally functioned as the sales office for the subdivision. Due to the property's association with Paxton and his contributions to the development of adobe brick manufacture and the construction of adobe brick residences, the 2608 South Escondido Boulevard property is eligible for designation under City of Escondido Criterion 1.

While the City of Escondido does not require an integrity analysis, the CRHR does, so despite being significant under City of Escondido Criterion 1, as detailed in Smith and Stropes (2018), the building no longer retains enough integrity to be eligible under CRHR Criterion 2. As such, it also no longer retains enough integrity to convey an association with Lawrence Green, Ismael Sanchez, Gene Peregov, or Hyram Arrowsmith. Further, the 2608 South Escondido Boulevard building is not the only structure in San Diego County used as a restaurant by Pat Brillo's Original Mexican Restaurants, which operated between 1954 and 1974. Therefore, under CRHR guidelines, it is not the building most associated with the life of Pat Brillo or the restaurant chain. In addition, although the Cueva family utilized the building as a restaurant between 1964 and 2003, the daily operation of a Mexican restaurant in Escondido, of which there are many, does not elevate the family to a level of significance.

A-2 (cont.)

The 2608 South Escondido Boulevard building is not in “excellent condition,” as it no longer retains enough original integrity to be eligible for listing under CRHR Criterion 3. Page 48 of the National Register Bulletin: How to Apply the National Register Criteria for Evaluation states that the resource “must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association” (Andrus and Shrimpton 2002). The kitchen addition, completed in 1962, is the only modification made to the building that is historic in age. The remainder of the modifications that have negatively impacted the building’s integrity are not historic in nature, and therefore, have not achieved significance in their own right. Conversion of the building into a restaurant in the 1960s and subsequent modifications made after that time negatively impacted its original design, materials, workmanship, setting, and feeling, rendering it ineligible for designation under CRHR Criterion 3.

LETTER

in excellent condition, this resource has retained and also gained further material integrity through changes in use, and embodies distinctive characteristics of the classic adobe style. Features include the clay tile roofs, exposed rafter tails, adobe block construction, window and door lintels, clay tile venting, wood doors and windows, and more.

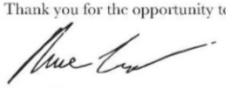
A-3

Last, stating the Paxton adobe cannot be seismically retrofitted seems misguided because stabilized adobe resources are inherently stable and are both simple to and cost effective to retrofit. SOHO strongly recommends an expert in the field, such as Structural Engineer Tony Court, evaluate the structural stability and seismic upgrades needed before making any further decisions. Tony Court can be reached at (619) 546-7050 or abcourt@abcourtsc.com.

A-4

SOHO finds the Paxton adobe at 2608 South Escondido Blvd. to be a unique and significant resource that is eligible for the CRHR under Criteria 1, 2, and 3 at the local and state levels. This cultural link represents the continuity of building adobe houses throughout the decades within the entire southwestern region and a MND does NOT meet the City's legal requirement under CEQA. Challengeable under CEQA, SOHO asserts an Environmental Impact Report (EIR) must be prepared for the Paxton adobe, which must include alternatives to preserve the full adobe building.

Thank you for the opportunity to comment,



Bruce Coons
Executive Director
Save Our Heritage Organisation

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RESPONSE

A-3 According to the Historic Structure Assessment for 2608 South Escondido Boulevard (Smith and Stropes 2018), the building does not currently meet code requirements and it would be incredibly costly to retrofit the building; however, it did not state that the "adobe cannot be seismically retrofitted." As referenced in Smith and Stropes (2018), the for 2608 South Escondido Boulevard building only retains two of seven original aspects of integrity due to the construction of "a large kitchen addition on the northeast corner of the building; conversion of the window on the west wing into a set of double doors; … installation of a door opening on the south façade; … application of plaster patches on weathered portions of the west and south façades of the west wing; … [and] replacement of the original roof underlayment," which included removal of all roof tiles, replacement of the underlayment, and reinstallation of the tiles affixing them with concrete. Although additional modifications were made to the building, those listed here are most relevant to the structural stability of the building. The removal of sections of an adobe wall, which by design is "load-bearing with low structural strength" to create door openings and construct additions onto the building, likely created instability in the walls, which are already showing signs of weathering, cracking, and potential water damage along the foundation. This is especially true as this particular building was constructed with beams across the last courses of bricks on the north, south, and west façades that "provided a long horizontal bearing plate for the roof thereby distributing the weight of the roof along the wall" (Nelson 1978). The alterations made to the building since its initial construction, which have led to a loss of original integrity, have also been identified by the Getty Museum as "serious building conditions" (Tolles et al. 2002). Those "serious building conditions" known at this time that apply to the 2608 South Escondido Boulevard building have been bolded in the list below:

> Serious building conditions that require attention when considering a retrofit program include:
>
> - **basal erosion (coving at the wall base);**
> - poor site drainage;
> - excessive moisture in walls, especially those covered by hard, impervious cement-type renderings;
> - **additional wall penetrations at structurally critical areas, such as corners and between original openings;**

A-3 (cont.)

- missing interior transverse walls;
- large areas of in-fill composed of incompatible materials of differing physical properties;
- absence of, or poorly attached, roofing;
- **absence of connections that provide continuity between adjacent building elements;** and
- evidence of previous severe earthquake damage that was only cosmetically repaired.

If the preliminary condition assessment and structural analysis identifies such conditions as critical, the need for a more far-reaching program to rectify deficiencies may be indicated (Tolles et al. 2002).

The Getty Museum also states that if these conditions have been observed:

An architect, engineer, or architectural conservator may recommend various types of tests to obtain accurate information about important materials concerns. Included in this category are tests to analyze mortar, adobe, or fired bricks to determine their composition and material properties (strength, modulus of rupture) and geotechnical testing to identify soil conditions and verify geological formations and hydrological conditions below grade. The latter are indicated if any evidence of settlement or foundation deficiencies is observed …

[However,] funding problems are one of the greatest deterrents to seismic retrofit projects everywhere. Commercial property owners cannot raise rents enough to cover the cost of a largely invisible upgrade. Similarly, a historic site cannot raise visitor fees sufficiently to finance a seismic retrofit project … In some instances, avocational archaeologists or student interns may be recruited to perform some tasks under professional direction. However, certain personnel substitutions or supposed economies, such as consulting a general contractor in lieu of an engineer to assess structural vulnerability and repair retrofit designs for unreinforced historic adobe buildings are not advisable and can raise liability issues in the event of casualties resulting from an earthquake (Tolles et al. 2002).

A-3 (cont.)

As recommended by the Getty Museum, the "Seismic Retrofit Planning Team" should include a preservation architect, an engineer, a social historian, an architectural historian, a conservator, and a historical archaeologist. Although the Smith and Stropes historic assessment for the 2608 South Escondido Boulevard building (Smith and Stropes 2018) evaluated the structure as eligible for the City of Escondido Register under Criterion 1, 3, 5, and 7, as stated above, the modifications made to the building since its initial construction have negatively impacted its original integrity and have resulted in building conditions that would require additional investigations, likely resulting in costly repairs and retrofit solutions that would not be financially feasible for the current property owner to fund. As with any cultural resource evaluation within the California Environmental Quality Act (CEQA) process, preservation is the preferred alternative for avoiding impacts to any archaeological or historic site/building. The preservation of a site is not, however, the only option to mitigate impacts. Given the proposed project design, preservation is not the mitigation option selected by the applicant. The CEQA process ultimately requires impacts to be mitigated, and in the case of the 2608 South Escondido Boulevard building, impacts to the historic structure can be mitigated to a level less than significant through the implementation of the Historic American Buildings Survey (HABS) process.

A-4 See responses to comments A-1 through A-3.

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Letter B

From: Diana Bartletti <dbartletti@icloud.com>
Sent: Monday, April 6, 2020 3:46 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Paxton Adobe, 2608 South Escondido Boulevard Project, City File Nos, ENV 19-0007, SUB 19-0010 and PHG 19-0050

April 06, 2020
From: Diana Rice Bartletti
dbartletti@icloud.com
To: City Of Escondido Planning Department
Attn: Jay Paul
jpaul@escondido.org
Re: 2608 South Escondido Boulevard Project
City File Nos, ENV 19-0007, SUB 19-0010 and PHG 19-0050

Dear Mr. Paul,

B-1 My family has a heritage adobe home, built by my father in neighboring Valley Center. I am writing to ask you to support historic preservation of the Paxton Adobe. I grew up in Escondido and have fond memories eating out at such a special restaurant - the old adobe ambience a unique part of Escondido. The Paxton Adobe is a valuable and irreplaceable local treasure, its demolition would be a grievous loss to the community.
Thank you,

Diana Rice Bartletti

B-1 The commenter raises an issue relating to the addition of residences at the project location. The project site is designated as Specific Plan and is located in the South Centre City Specific Plan (Southern Entry District) with a mixed-use overlay. The project site is currently surrounded by other residential uses, including multi-family housing directly to the north. The project would be consistent with both the General Plan land use designation and zoning code, that allows for higher density, multi-family type development at this location. Therefore, the project is an allowable use and would not introduce population growth that was not already anticipated by the City of Escondido General Plan (see IS/MND Section XIV).

With respect to the issue of the historic value of the remaining adobe, a historic evaluation was prepared using the California Register of Historic Resources criterion and the City's Register criteria. It was determined that demolition of the building would result in a significant impact to a historical resource, identified in the IS/MND as Impact CUL-1 (see IS/MND Section V). Mitigation measures are proposed to reduce this impact including the following:

- Level I or II Historic American Buildings Survey documentation (MM-CUL-1);
- Salvage of architectural elements, as feasible (MM-CUL-2);
- Implementation of an interpretive program on-site that references the property's history and the contribution of the historical resource to the broader neighborhood or historic district (MM-CUL-3).

Implementation of the mitigation measures MM-CUL-1 through MM-CUL-3 would reduce the significant impacts associated with the demolition of a historical resource to a less than significant level.

Letter C

From: Lucy Berk <lucyberk@att.net>
Sent: Monday, April 6, 2020 12:10 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Paxton Adobe

Dear Jay,

C-1 **I come out of deep retirement to share with you and the Planning Commission my heart-felt and research-backed conviction that the Paxton Adobe is a strong link in the social and architectural heritage of the Escondido Valley.**

My years of education in Public History at USD, terms on the S.D. Historic Site Board, Escondido Design Review Commission, Pioneer Room Friends Board, and a founding and long time member of the Escondido Historic Preservation Commission, I feel I have had sufficient experience in researching Escondido history and understanding its context through the ebb and flow of the valley's growth and development to state that the Paxton Adobe should be saved, and reused, as it has been many times, as a monument to Mid-Century Escondido.

If a development o this adobe's location is to proceed, the house and good bit of the gardens should be incorporated into the public use factor.

With strong conviction, I support the research and presentation to you from Historian Alexa Clausen.

Sincerely.

Lucy Jones Berk
710 W. 13th Avenue
Escondido, CA 92025
760-745-5667

C-1 See response to comment B-1 regarding the historic value of the remaining adobe.

Letter D

From: Alexa Clausen <aclausen07@hotmail.com>
Sent: Tuesday, March 31, 2020 9:21 PM
To: Jay Paul
Subject: [EXT] Fw: HPC meeting and City Council 2608 S. Escondido Blvd

D-1 **Mr. Paul: Members of the Adobe Home Tour committee were given the date for the Historic Preservation Committee as March 19th. Of course, under the circumstances, the meeting was cancelled. Please let me know if HPC meetings will take place electronically. If yes, when will this matter be on their agenda.**

Also, will this matter go forward to City Council? If yes, when– I see that they do meet electronically.

Thank you
Alexa Clausen

From: Alexa Clausen
Sent: Tuesday, March 31, 2020 9:10 PM
To: jpaul@escondido.org <jpaul@escondido.org>
Cc: Robin Fox <fox@escondidohistory.org>
Subject: Public response deadline for 2608 S. Escondido Blvd. project

Hello Mr. Paul: I hope you and your family are getting through this crisis as safely as possible.

While it is hardly a time to concentrate on other than getting through the day, I wish to verify that April 6th is still the public response deadline for the proposed planned apartment development project which request a permit for the demolition of the Paxton adobe-- 2608 S. Escondido Blvd.

Thank you
Alexa Clausen

D-1 Comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

Letter E

From: Alexa Clausen <aclausen07@hotmail.com>
Sent: Sunday, April 5, 2020 7:52 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Opposing proposed demolition of Paxton adobe

E-1 **Hello Mr. Paul: Attached are my findings which demonstrate that the Paxton adobe is an Escondido Historic Landmark, and has been considered such for a number of years. I am opposing the proposed demolition of this recognized historic landmark based on my research that was initially generated for Adobe Home Tour, 2014. I have summarized, how this adobe structure meets seven of seven criterion for listing and recognition as a cultural resource based on historical evidence and historical context.**

Thank you,
Alexa Clausen

E-1 The historic nature of the remains of the adobe building is acknowledged. A historic evaluation was prepared using the CRHR criterion and the City's Register criteria. It was determined that demolition of the building would result in a significant impact to a historical resource, identified in the IS/MND as Impact CUL-1 (see IS/MND Section V). Mitigation measures are proposed to reduce this impact including the following:

- Level I or II Historic American Buildings Survey documentation (MM-CUL-1);
- Salvage of architectural elements, as feasible (MM-CUL-2);
- Implementation of an interpretive program on-site that references the property's history and the contribution of the historical resource to the broader neighborhood or historic district (MM-CUL-3).

Implementation of the mitigation measures MM-CUL-1 through MM-CUL-3 would reduce the significant impacts associated with the demolition of a historical resource to a less than significant level.

Attachment to Letter E

April 5, 2020

To: Planning Department, City of Escondido

From: Alexa Clausen,
Volunteer Adobe Home Tour; author of research on the Paxton Adobe

E-2 Re: "HISTORIC STRUCTURE ASSESSMENT FOR 2608 SOUTH ESCONDIDO BOULEVARD ESCONDIDO, CALIFORNIA APN 238-152-07" authored by Jennifer R.K. Stropes, M.S., RPA Consulting Historian Historical Research Associate for Brian F. Smith and Associates, Inc.

I am retired from a 35-year career with California State Parks as a State Historian. Since 2011, I have volunteered with the Escondido History Center for the annual Adobe Home Tour. Based on my research for the 2014 Adobe Home Tour and my continued research relative to the Paxton Adobe, I am presenting the facts leading to the proper conclusion that the Paxton Adobe is, indeed, a well-known historic landmark for the City of Escondido. The historic value of the Paxton adobe has been well established in prior years and should be recognized as such.

1

E-2 The historic context of the Paxton Adobe is noted. See response to comment B-2.

Response to the
Historic Structure Assessment for the Paxton Adobe,
Located at 608 South Escondido Boulevard

by Alexa Clausen

Based on my experience and research of this historic site and its historical context, I have determined that the Paxton Adobe meets all of the seven criteria listed by the City of Escondido for placement on the Local Register of Historic Places and qualifies as a Historic Landmark. The City's Historic Preservation Ordinance No. 2000-23, Section 33-794-5 identifies a process and criteria for listing historic structures on the City's Local Register. A potential historic resource is evaluated against seven criteria and must meet only two of the seven to qualify.

(1) Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state or nation.

Charles H. Paxton –represented in the Stropes Assessment

In addition to Paxton's investment in both the big dream for a large adobe housing development and the manufacturing of adobe block, Paxton invested in the construction of an adobe "restaurant and cocktail lounge" south of the model home. (*San Diego Union*. 05-01-1949. Genealogybank.com) Rancho El Ku diner, built in September, 1946, and later known as Hans Danish Farm Restaurant, was planned by Paxton and a business partner to take advantage of the magnificent view of Lake Hodges. Since the 1930's a "Super Lake Hodges," had been planned that would have moved the lake shoreline including and past the Westfield North County shopping mall. The super Lake Hodges never materialized. Paxton lost this business in 1951. (*San Diego Union*. Genealogybank.com) This information is contextual to the history of the Paxton adobe.

Paxton said the adobe homes would be built in units of 10 each. The 10 dwellings now under construction represent four distinct types of 2-and-3-bedroom homes, ranging from 900 to 1100 square feet. Each, however, will include outdoor patios with built-in barbecues, fireplaces, roofs of mission tile and quarry-tile floors. Each residence also will have an attached car port. Home laundries and dish-washing units are provided in the houses which are expected to sell from $9500 to $15,000, depending on the size and location.

The new tract is arranged to preserve the country atmosphere and each site will have at least 1 acre, some of them 2 acres, to provide ample room for gardening and fruit growing. Some of the lots border the anticipated shore line of the proposed Super Lake Hodges.

SDUT 05-01-1949

Lawrence R. Green (AKA L.R. Green) rancher, real estate developer, and philanthropist

The Paxton Adobe was the cornerstone for launching a unique post-war housing development generated because of the investment and dream of one of Escondido's foremost mid-twentieth century business advocates and noted philanthropist, Lawrence R. Green (AKA L.R. Green). His interest and investment in the Escondido community began in 1927. At one point, Green offered 150 acres of land east of the El Ku restaurant for consideration to construct Palomar College as a staunch believer in the future of Escondido's growth and developments. He is also known for many other philanthropic activities (*Times Advocate*. Newspapers.com 01-21-1949). Today the elementary school adjacent to Kit Carson Park is named and dedicated in his honor because of his philanthropy.

More documentation:
https://adobehometour.com/wp-content/uploads/2017/09/In-memory-of-L-R-Green.pdf

Modern Adobe: Preservation of pre-and post-World War II residential construction in Southern California, Dominic Calarco, 2008. Master's Thesis in Historic Preservation, Welch Center for Graduate and Professional Studies Goucher College. Pages 66-70.
https://drive.google.com/file/d/1W2lO_dXcinSxehlPmAmKLtTqekrKjvvA/view

After Charles Paxton left the area, the all-adobe home development construction continued under the direction of LR Green. Three decades of adobe home construction followed in the adjacent properties and throughout Escondido and North county. The Adobe Block Company, and associated manufacturing of adobe block, adjacent to the residential development is also considered part of the context of this history. Green turned over the operation to daughters Helen Banister and Hildrith von KleinSchmid. Both women owned adobe homes in the Las Palmas/El Ku neighborhood.

Figure 21: Adobe Block Company Offices (ca.1949) [Escondido History Center Photographic Collection]

M.A. Thesis - Dominic Calarco, 2008

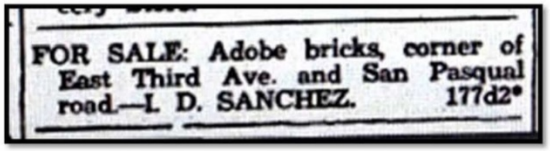
Ismael D. Sanchez, adobe builder and Seventh Day Adventist minister.

As a skilled mason, Ismael Derrick Sanchez did it all, utilizing adobe, concrete, flagstone, and other construction material. Born in 1894, Ismael grew up in the vicinity of Safford, Arizona where his father, Abel, and his mother were among the first families to convert to the area's newly founded Spanish-speaking Seventh-day Adventist congregation. Ismael did not continue to farm as his family had, but at a young age was destined to be an apostolic minister for the Seventh-day Adventist church and also learned the trade of masonry and adobe construction.

He and his young family settled in Fair Oaks, outside of Sacramento, where Ismael established his trade in masonry, specializing in adobe. In the early 1940s,

Ismael moved to the San Pasqual Valley to live with his daughter, Rosalynne Bagstad, and family, an area where the Seventh Day Adventist (SDA) community remained strong for over 70 years. In Escondido, Ismael continued his trade as a contractor specializing in adobe. His grandson, local resident Michael Bagstad, recalled that his mother often pointed at the Paxton Adobe and said, "Your grandfather built it." Sanchez contracted with Charles Paxton to build the model home that launched L.R. Greens' all-adobe housing development.

Michael Bagstad noted that his grandfather built adobes prior to the Weir Brothers establishing their business in Escondido. His brother, Wayne, recalled that their grandfather and uncles made their own adobe block using forms that looked like ladders. Handmade bricks were not uncommon as long as regulations were followed for adding emulsified asphalt. At times, Ismael recruited family members for construction projects. The team would consist of Michael's dad, Alvin Bagstad, and two uncles; Ken Sanchez and Adolf Bautista.


FOR SALE: Adobe bricks, corner of East Third Ave. and San Pasqual road.—I. D. SANCHEZ. 177d2*

Daily Times Advocate Newspapers. com March, 1946

The Sanchez family took on many masonry projects in the Escondido region including work for Abram Houghtelin, who was the famed builder of the iconic Escondido Teepee. Later, Ismael moved back to Fresno where he continued in masonry contracting work until his death in Mexico City in 1967. He is buried in Fresno.

Further documentation: https://adobehometour.com/wp-content/uploads/2019/05/Ismael-D.-Sanchez-Adobe-Builder-1894-1967.pdf
http://documents.adventistarchives.org/Books/TUS2000.pdf

Patrick Brillo Osorio, owner and founder of a small, popular restaurant chain.

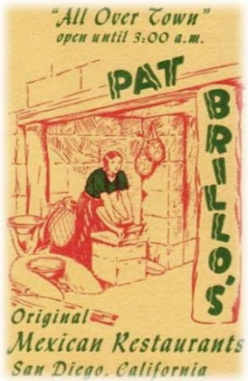
The following is to provide contextual information: Escondido welcomed, with much excitement, a new Mexican restaurant opened by Patrick Brillo Osorio, son of an Austin Texas restaurateur. By 1962, when Pat and wife Mattie Osorio opened *Adobe Hacienda* in Escondido, Pat Brillo's restaurants had already become a household word for fine Mexican food dining. Their very popular Tex-Mex chain restaurants were located primarily in San Diego.

"Pat was a Marine Corps veteran of WWII. Osorio had owned a small engraving company downtown San Diego where he began to sell coffee and doughnuts. After dining at a Mexican restaurant in Old Town, he proclaimed 'this is what I want to do,' and learned all he could about Mexican cuisine. His first location was a small place downtown at Tenth and E Streets, and the business took off. In 1961, he took over the restaurant concession for *Rancho Presidio Hotel* in Mission Valley, operating a *Pat Brillo's Presidio Grill* until the hotel was remodeled ...and became the *Hanalei Hotel.*" Patrick B. Osorio passed away in Austin, Texas in 1976.

Sources consulted: https://classicsandiego.com/mexican/ ; *Times Advocate*. Newspapers.com; *San Diego Union*. Genealogybank.com

San Diego's North County. "My Mexican-style ranch dishes belong to this region," Brillo says. "It is hard to capture the right atmosphere in a downtown location."

Located three miles south of Escondido on Highway 395, the Adobe Hacienda has an outsized pool in the back courtyard, a bar for outdoor service and a lawn area that is screened by landscaping. Inside are found three separate dining areas. While the Adobe Hacienda can accommodate over 150 patrons, the sectionalizing of the Hacienda provides small group intimacy.



Times Advocate, 09 06 62 Newspapers.com https://classicsandiego.com/mexican/

Pat Brillo's Adobe Hacienda restaurant left an indelible mark on Escondido residents and those in neighboring communities. It can be best described by Ron Kenny, in his 2016 reflections on the commercial growth of Escondido, specifically dining opportunities.

When the city had less than 10,000 population 65-plus years ago, ...A restaurant with real class – panache, if you will – was Pat Brillo's, an adobe, hacienda-style offering Mexican cuisine on South Escondido Boulevard. It was succeeded by Los Amigos on the site now occupied by an equally classy Hacienda de la Vega. One thing that made you want to return to Pat Brillo's was the most congenial host by the same name. A popular "watering spot" was the Red Coach Inn on Pine Street (frontage road off Centre Parkway) between Grand and Valley Parkway....

"Ron Kenney, a 60-year resident of Escondido, was a reporter and editor for the former Daily Times-Advocate from 1952 to 1979 and was a copy editor on the editorial pages of the San Diego Union from 1985 to 1997." Full context: https://www.times-advocate.com/articles/escondido-reflections-15/

Hyrum J. Arrowsmith, adobe building contractor

The Paxton adobe was built as a residence and to promote business. In 1959, the building and grounds became the home for landscape architect Gene Peregoy. He and his wife, Viola, operated a garden shop on the property, the *Hacienda Nursery*, repurposing the model home. When the Peregoys sold the property, it entered into its third life as a Mexican restaurant owned by Pat Brillo. In 1962, contractor Hyrum Arrowsmith added the 650 square-foot kitchen for this adaptive use.

As a custom adobe home builder, Hyrum Arrowsmith teamed with his son-in-law to design and construct mid-century modern adobe homes in the Las Palmas neighborhood at the height of the Escondido and North County adobe home construction revival. Grandson Mike Burton wrote: "My grandfather was a carpenter in Salt Lake City, Utah, who hauled coal in the winter. It was the depression and there wasn't much work around." Arrowsmith also secured a job as a carpenter building movie sets at MGM studios. "After my dad & grandfather started working together, they also built homes separately in Burbank, Playa del Rey, and Palos Verdes Estates before coming to Escondido in late 1955, and that's when the adobe construction started."

Following the pattern of many home builders in California and other areas in the United States, the Arrowsmith-Burton team became "spec builders." "All of the homes, but three, were built for speculation." Hyrum Arrowsmith and Don Burton bought subdivided lots in Longview Acres (the Las Palmas neighborhood) from L.R. Green, purchased building materials, and constructed adobe homes primarily from the designs Mike Burton describes as from "my family's style." (Mike Burton email correspondence November through January 2016 to Alexa Clausen, volunteer, Adobe Home Tour, 2016.) Documentation see: https://adobehometour.com/wp-content/uploads/2015/05/Don-Burton-Master-Adobe-Builder.pdf

By VIVIAN DOERING
T-A Staff Writer

Mr. and Mrs. Hyrum Arrowsmith of 2750 Las Palmas Ave., Escondido, will celebrate their golden wedding anniversary on Monday. The couple was married on June 21, 1921, in Salt Lake City, Utah.

They will be honored at an open house at their home scheduled for 4 to 8 p.m. Saturday. Mrs. Don Burton of Escondido, their only child, will be hostess for the reception which is open to friends and relatives.

Mrs. Arrowsmith recalls building contractor.

The family moved to Escondido 15 years ago where Arrowsmith has helped to build a number of the adobe houses in this city.

Mr. and Mrs. Arrowsmith are active in their church, the Church of Jesus Christ of Latter-day Saints. His grandparents came to Utah with handcarts many years ago and experienced the grasshopper plague.

In addition to their daughter, the couple has one grandchild and two great-grandchildren, all of Escondido.

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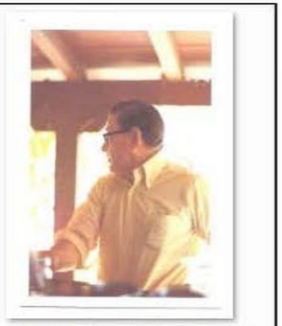
Times-Advocate, June 18, 1971 Newspapers.com

Benjamin Cueva, Sr and Esperanza Ramirez Cueva, restaurant owners

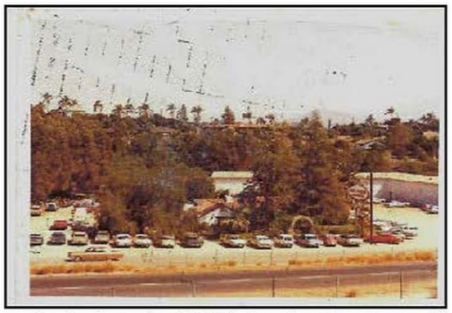
"After Pat Brillo's went out, my Dad, who was a realtor, convinced Benny Cueva to buy that restaurant as his small restaurant on Escondido Blvd., across from what is now Bank of America, was overwhelmed with people lined up on the sidewalk. His food was wonderful. Dad loved Benny." (email: Karen Nelson to Alexa Clausen for Adobe Home Tour, June 10, 2015)

Benjamin, Sr. and his wife Esperanza Ramirez Cueva had owned a small Mexican food cafe and then a second location when they made the leap to purchase Pat Brillo's on south Escondido Boulevard. (personal communication: Ben Cueva to Alexa Clausen 08-06-2014 at *Hacienda de Vega*)

At the new location, they brought their reputation for home-style Mexican cuisine, pumping new life into the former Pat Brillo's *Adobe Hacienda* restaurant, which had closed in 1971. The Cuevas' successful business venture continued the use of this landmark location not only for dining, but as an inviting place for business meetings and family-oriented community activities, becoming well known under their ownership for 30 years. (*Times Advocate*. Newspapers.com 1972-1985)



Ben Cueva, Sr. at Los Amigos family photo collection



Los Amigos about 1974. Courtesy Ben Cueva, Jr.

The sudden passing of Mr. Cueva, in December, 1979, left his widow, Esperanza, and son, Ben, to continue to manage and operate *Los Amigos*. The long-known beloved Mexican restaurant retained its vibrant atmosphere for several more decades under the guidance of Esperanza, who had first decided on this location for their expanded business. As stated in Esperanza's *San Diego Union Tribune* obituary, "Born in 1919, in a small town between Guadalajara and Puerto Vallarta called Tecolotlan, Cueva came from a well-to-do family and was one of a few women in her generation to graduate with a PhD from the University of Guadalajara." Documentation for Esperanza Cueva: https://www.sandiegouniontribune.com/sdut-escondido-woman-lived-life-at-top-speed-2005aug27-story.html

Benjamin Cueva, Jr. Business owner, community leader

Ben Cueva grew up in Escondido, often travelling to Mexico to visit his mother's family. Ben had been attending law school at U.C. Berkeley when his father, Ben Sr., passed away. His brother and sister had newly launched careers, so the choice to help their mother hold together their family business fell to Ben. Over the years, Ben had accumulated many memories of their restaurant as a community centerpiece. The original swimming pool was filled in to become a pond since one-too-many customers had taken an unexpected bath. Celebrity Red Skelton stopped in for drinks and dining while in the area, visiting his daughter in Rancho Santa Fe. The success of the restaurant met its fate in 1980 when the I-15 was constructed and the south Escondido Blvd. businesses were closed off from hundreds of passing cars that brought business to this section of Escondido.

Ben Cueva, Jr. contributed much to the Escondido community and promoted many Latino cultural events to expand the appreciation of Mexican culture. He was chairman of the Cultural Arts Commission, Escondido's Hispanic Liaison for the development of the Interpretive Center at San Pasqual Valley Battlefield State Park and the Californio Battle reenactment, Vice President of the Charros Association, and was singlehandedly responsible for the preservation of several historic structures at risk of demolition in Escondido.
(personal communication: Ben Cueva to Alexa Clausen 08-06-2014 at *Hacienda de Vega*; http://www.sohosandiego.org/pip2010/beniamin.htm; also *Times Advocate*, *Newspapers.com 1980-*)

Museum to encase area's war history

By Heinz Schleuss
Times Advocate Staff Writer

SAN PASQUAL – There they were, a state senator, a Hispanic activist and an Indian tribal leader, together gripping the shovel that broke the ground for the San Pasqual Battlefield Museum.

Symbolic, perhaps, but not quite the way it was in 1846 when members of three cultures – early white settlers, Mexicans and Indians – clashed in what became the last skirmish of the two-year Mexican-American War.

History, it seemed, had come almost full circle on Thursday – but not without a fight of a different sort.

"I'm elated with the progress so far," said Sen. Hill Craven, R-Oceanside, after the ceremony.

"We really had a long battle, one that goes back six years," he said. "But we managed to hold on, and I think we're going to have something that North County and the whole country will be proud of."

Craven joined a crowd of about 100 civic leaders and history buffs on hand for the half-hour ceremony.

'You can't say there was one good guy and one bad guy. . . . What we're trying to do is present a perspective that appreciates all cultures involved.'

With the aid of a three-handled spade – designed for the occasion by John Markham of the Escondido Historical Society – Craven, La Jolla tribal elder Henry Rodriguez and Ben Cueva, a leader in the North County Hispanic community, shoveled out a small piece of earth.

By June the 49-acre field of sagebrush will be transformed into a $1 million monument to the battle for control of California.

It was Dec. 6, 1846, when Gen. Stephen Kearny's American

Please see **Museum**, Back Page

From left, Rodriguez, Craven anc Cueva at groundbreaking Thursday.

Times Advocate, 08-04 1984. Newspapers.com

(2) Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered.

The buildings on the property, all original, perfectly embody the distinguishing characteristics of the classic Adobe style that became popular in

Escondido at the time they were constructed. Clay tile roofs, adobe block construction, wooden beams atop the windows, and other Spanish revival details are all characteristics of the classic Adobe. The Paxton name is clearly identified with the adobe movement as one who helped initiate the building trend.

Charles Jackson Crable, draftsman and designer for Charles Paxton
Further contextual reference:

"Born in San Diego, CA on Jan. 13, 1909. Crable studied at the San Diego Academy of Art (1928-29) and continued on a scholarship at the Santa Barbara Art Institute. While at the latter, he assisted Albert Herter on local murals and continued with him in Biltmore and NYC. From 1934-43 he was a photographer-artist for the San Diego Union. His remaining career was as an architectural draftsman. In his leisure he made painting forays to Borrego Springs and the back country of San Diego. He died in Ventura, CA on Nov. 28, 2002."

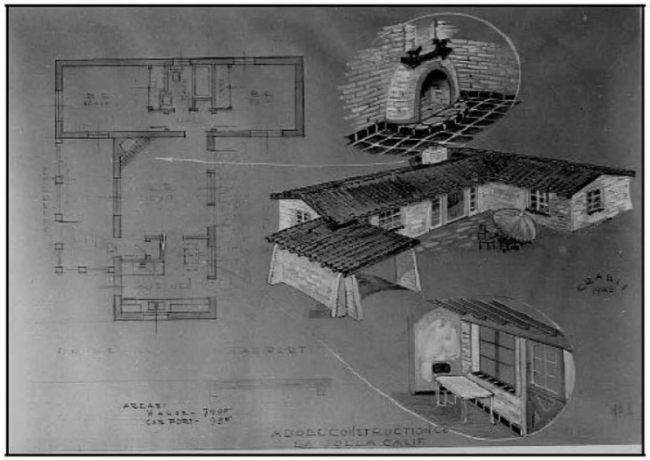


Figure 79: Plans for a modern adobe with Spanish and California ranch influences, Adobe Construction Company, La Jolla (ca. 1949) [Escondido History Center Photographic Collection] http://www.askart.com/artist/Charles_Jackson_Crable/11002575/Charles_Jackson_Crable.aspx

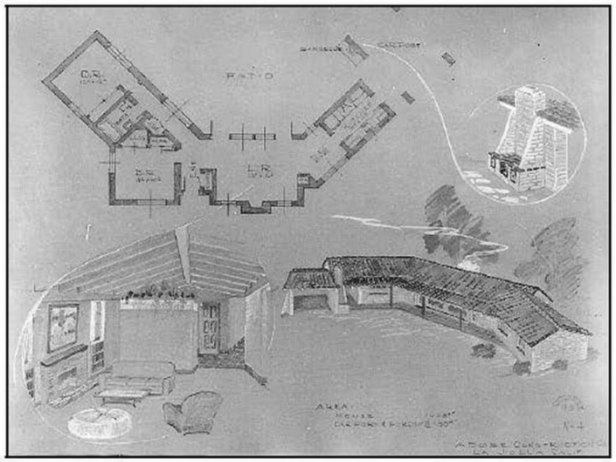
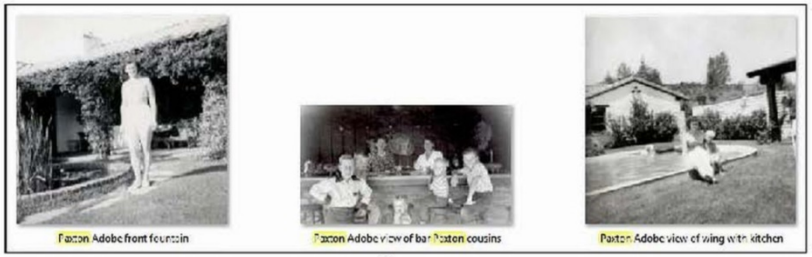


Figure 85: Plans for a modern adobe with Spanish and California ranch influences, Adobe Construction Company, La Jolla (ca. 1949) [Escondido History Center Photographic Collection]

In addition to the adobe structure and its architectural details, the property retains numerous hardscape elements that prove that the integrity of the adobe and surrounding grounds remain intact. The Lanai (bar), fountain, and swimming pool, seen in the following photos, are all original to the home.

The following photographs were taken about 1949. Courtesy of Larry and Pam Paxton for Adobe Home Tour, July 2014.



Paxton Adobe front fountain

Paxton Adobe view of bar Paxton cousins

Paxton Adobe view of wing with kitchen

Paxton Adobe Ramada

Paxton adobe front door with fountain

Paxton adobeback yard pool

Paxton Adobe View of Ramada-bar

Paxton adobe kids learn to swim

Adaptively re-used as a restaurant, those very same features also contributed to the history of the restaurant phase, an era of over 50 years as a business and commercial property that carefully maintained the residential roots.

The 1962 commercial kitchen addition, built by well-known contractor Hyrum Arrowsmith, did not negatively impact the historical integrity of the structure but contributes to its history. In fact, it is an important alteration that allowed the home to transform from residential use to a unique family diner, specializing in Mexican food and contributing to the Escondido community for over 50 years as has been well documented.

The original adobe structure, itself, has minimal loss of integrity. Due to the durability of the construction material, the majority of Southern California historic adobes are restorations, NOT reconstructions. A professional study by experienced and qualified adobe restoration architects, engineers and contractors would be the best way to address the true integrity and condition of this structure.

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Examples of adobe restoration specialists:
https://isarchitecture.com/accolades/
http://www.msauer.com/adobe-restoration/
http://eagle-restorations.com/other-projects/

For further information, the Getty Conservation Institute has established clear guidelines for the seismic stabilization as well as the preservation, restoration and rehabilitation of historic adobe resources. "Thick adobe walls are inherently stable and have great potential for absorbing energy. These stability and energy absorption characteristics can be enhanced by the application of a number of simple seismic improvement techniques..." pg. 8
https://www.getty.edu/conservation/publications_resources/pdf_publications/pdf/seismicstabilization.pdf

(3) Escondido historical resources that are connected with a business or use that was once common but is now rare;

The Paxton adobe served as a model home to launch the sales of the all-adobe residential development nearby. This subject has been thoroughly documented. In light of costs and construction material issues, such a development is highly unlikely to be replicated in California in the future.

Charles Paxton adobe, taken about 1949. Larry and Pam Paxton for Adobe Home Tour, July 2014.

The Paxton Adobe-turned restaurant is an exceptional example of a unique Post World War II Latino family-owned, then single-woman owned Mexican business providing a family dining atmosphere, a community gathering place, and an eating destination situated to attract travelers on the adjacent historic Highway 395. The fact that this property had been an adobe residence and garden shop enticed Esperanza and Benjamin Cueva, Sr. to purchase the established restaurant

and to expand their business. According to Esperanza's *San Diego Union Tribune* obituary, Benjamin Cueva, Jr. explained, "'They expanded the business and moved to a larger location before settling in the early 1970s into the large adobe house that would be Los Amigos' home for the next 30 years... It's just the most beautiful place, and my mother loved it, it was like a part of her,' her son said. 'She bought it when it was a private adobe home surrounded by palm trees, and it has a huge pool and patio with bougainvillea all over it.' After her husband's death in 1979, Cueva single-handedly ran the restaurant for decades..."

https://www.sandiegouniontribune.com/sdut-escondido-woman-lived-life-at-top-speed-2005aug27-story.html

Pat Brillo's 6th year
Times_Advocate__Mar_15__1968_

Los Amigos new sign, 1984 Cueva photo collection

Ismael Sanchez and his family are representative of theme studies of American labor history post World War II that fall into underrepresented members of the community who owned small businesses and provided skilled labor services to their communities.

https://resources.ca.gov/CNRALegacyFiles/docs/cche/TheLegacy_of_CaliforniasLandmarks.pdf

The adobe was also purchased by Gene and Viola Peregoy to become a commercial nursery and for Gene, a graduate of Cal Poly, Pomona, to continue his profession as a licensed landscape architect. The growing South Escondido Blvd. community welcomed this new addition. Small, family-owned nurseries were once very popular in Escondido. The abundant water source made it an excellent location for this business. During the short stay in Escondido, Gene Peregoy

participated in community events and often donated to fundraisers. However, it was not possible to generate enough income for the Peregoys and their business closed shortly after. (Times-Advocate. Newspapers.com)

Another New Business Welcomed

A PRE-TOUR of the Hacienda Nursery, a new plant and tree nursery opening here, was held Thursday. City business and professional people were invited to tour the grounds. City Councilman James M. Anderson (second from right) officiated at a ribbon cutting ceremony. Robert Sanders (far right), first vice president of the Chamber of Commerce, represented the Chamber. The Peregoys and two of their daughters stand to the left of Anderson.

New Nursery Will Stock 400 Varieties Of Plants, Trees

An estimated 15,000 plants, trees and shrubberies of more than 400 varieties are featured at the Hacienda Nursery, 2008 Highway 395 South, which will hold its grand opening Saturday and Sunday.

Owners and operators of the nursery are Mr. and Mrs. Eugene Peregoy, formerly of Pomona. Peregoy's specialities are ornamental horticulture and landscape design. He is a graduate of California State Polytechnic College at Pomona.

The Peregoys operated a nursery at Pomona for three years.

Tropical, oriental and semi-desert plants are some of the special plants the nursery will stock. It also will offer large shade trees and ornamental trees.

In addition to the nursery on the 1½-acre site, the Hacienda has a garden shop and a coffee bar. A children's play area, which will have free burro rides, a sand box and swings, will be opened in about two weeks. The parking area will accommodate about 60 cars.

Peregoy, who employs ten persons, said the nursery is designed to serve northern San Diego County. He said he has an estimated $25,000 invested in the nursery.

The Peregoys, who moved to the area in January, have three daughters, Laura, 10; Lynn, 13, and Lani, 6.

Times Advocate 02-16-1960. Newspapers.com

(4) Escondido historical resources that are the sites of significant historic events;

The original Paxton home was the incubator for the adobe revival construction Escondido on a large and organized basis. "We can consider the Hacienda as a founding/birth place casa for the adobe suburban development in the South east Escondido area." (Karen Nelson to Alexa Clausen email 07-28-14 for Adobe Home Tour, 2014)

The context relative to the site includes the plans to create an entire lake-side adobe community in anticipation of the expansion of Lake Hodges. As a restaurant, it hosted regular meetings for various local organizations that were tightly connected to and invested in the community.

(5) Escondido historical resources that are fifty (50) years old or have achieved historical significance within the past fifty (50) years:

The Paxton adobe home and outbuildings were built in 1946, thus they have achieved the 50-year designation requirement. The commercial kitchen that became the heart of the restaurant period and is in its own right a part of the historic landmark legacy, was constructed in 1962, and has also achieved the 50-year mark.

(6) Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area or district;

Lawrence R. Green was inspired to build an "adobe only" affordable housing community in Escondido. To this day, the nearby Las Palmas and surrounding neighborhoods are rare examples of mid-century modern residential developments built according to "adobe only" restrictions found only within the city of Escondido and a limited number of other areas within the County and State.

City of Fresno:
https://ohp.parks.ca.gov/pages/1054/files/2008_Fresno_MidCentury%20Mod%20HCS.pdf

San Joaquin Valley:
https://adobehometour.com/wp-content/uploads/2015/10/Building-In-Adobe-in-the-San-Joaquin-Valley-VAF-Conference-Fresno-2008.pdf

East Sacramento, Adobe Village:
http://www.valcomnews.com/remembering-les-meinzer-the-arden-area%E2%80%99s-adobe-builder/

(7) Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type

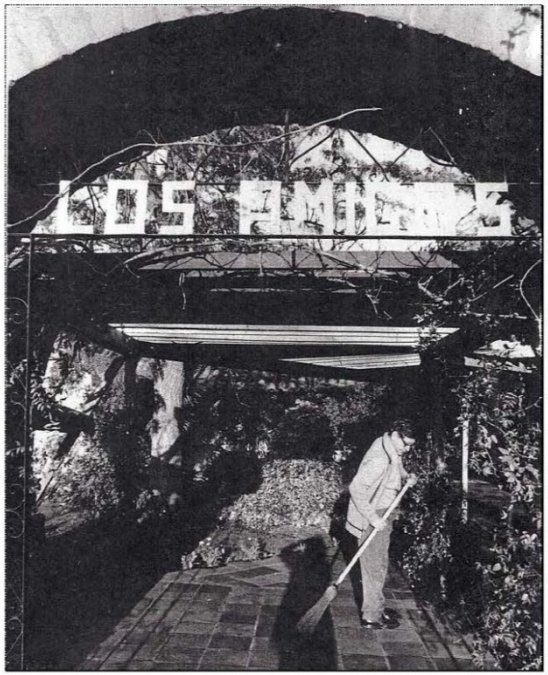
The Paxton Adobe is an excellent local example of an American Mid-20th Century urban home with a custom adobe revival style. The use of rustic handmade adobe block is rooted in Escondido's earliest construction heritage when they were

used in the earliest adobe ranch buildings, dating first to 1836 when the Pueblo of San Pasqual and its adobe chapel were constructed by Native Americans. The following decade witnessed the construction of residential adobe structures in both Rancho Rincon del Diablo and Rancho San Bernardo, the adobe home of the latter has been located at the end of South Escondido Blvd.

Full source see: http://sanpasqual.org/?page_id=1037

The Paxton Adobe features post World War II adobe construction, with local interpretation of Spanish colonial revival, merged with California Mexican ranch, and resulting in unique custom home construction.
For full documentation-- see link provided courtesy of adobehometour.com:
Modern Adobe: Dominic Calarco, 2008. Pages 90 -96. Figures 21,24,79 and 85.

Compared to more typical wood-framed housing, adobe homes are a rare commodity, as current sales demonstrate. They continue to be well-loved, as indicated by the popularity since the first annual Adobe Home Tour, hosted by the San Diego Adobe Heritage Association in 2011. In spite of the fact that adobe homes have clearly withstood multiple earthquakes over the decades, the material is no longer economically feasible for new construction due to tightened building code requirements related to seismic precautions. Therefore, the construction of adobe homes is clearly a part of our past that will not be replicated ever again, demanding careful preservation of the limited number of buildings currently in existence.



Ben Cueva, Sr. preparing for work at his beloved "Los Amigos", shadow of son, Ben taking the photo.
Courtesy of Ben Cueva, Jr.

Letter F

From: Kristen Dixon <dixon222@cox.net>
Sent: Monday, April 6, 2020 6:24 AM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] 2608 South Escondido Boulevard Project

Hi Paul,

F-1 I'd like to add our voice to the discussion. We've heard lots of stories about the history of the place in the 15 years we've been here.
We used to eat at Hacienda de Vega all the time before it closed and were very sad when it did. We loved it! We only live a half mile away as do so many others since the recent completion of so many more dwellings around here and we hear several more at different locations are already planned. The neighborhood is already very crowded and at times it's a nightmare to get thru the confusing Escondido Blvd/Citricado/Center City intersections on the East side of Center City. BAPS is finally open and it draws traffic, too. It was making us so happy before the Covid-19 stay at home order. We really suffered in the years that it took to upgrade the old Center City Cafe having lost both restaurants at about the same time. With the commercial construction on Brotherton and the planned development after the sale of the Canterbury Gardens site what we long time residents and all the new residents coming into all the other new construction need is for the Hacienda de Vega site to stay commercial and not crowd us further but serve our community and very hopefully stay a restaurant with all the charm of the great historic adobe construction that is the hallmark of the area.

F-2

Thank you for your consideration,

Kristen & Mary Dixon

2891 Verda Ave.

F-1 Comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

F-2 See response to comment B-1.

Letter G

From: Jenny HOve <jennykhove@gmail.com>
Sent: Sunday, April 5, 2020 3:49 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Imput regarding the Hacienda de Vega demo

Dear Mr. Paul,

G-1 My husband and I moved to Escondido about 12 years ago. We fell in love with its old town charm, the gorgeous scenery, and the many parks in the area. We were able to purchase an adobe house and have been working on the house for several years as we absolutely love the beauty of the older homes.

The purpose of this email is to share my concern about two matters regarding the Hacienda de Vega site and its possible 'demolition' and also the construction of an apt. building in its place.

G-2 1) One of the charms of a city are those special places, the unique sites and places that your friends, the town's residents, and its visitors always remember. The Hacienda de Vega restaurant was very special and has had a long history in Escondido. Yes, just like our house when we purchased it, it needs cleaning and a bit of sprucing up. Over the past few years we have added TLC to our 1958 home, and that is pretty much what this unused building seems to need as well.

Looking over the info regarding this property, I see on one hand it is noted as a historical property. But then when going over the section specifically dealing with its 'historical status' it appears that a decision was made to basically overrule this 'historical' status. There were several sections. I was very surprised to read the many conclusions made. When I read that even the "Integrity of Feeling," referring to its historic sense of property, was overruled, I was floored. And saddened. It is not even historic? I am not going to go through the other sections; this one made me question everything about this report.

G-3 2)The town of Escondido of late is slowly losing its charm with the absorption of apartment areas in small areas. I am in agreement that we all need to contribute to more affordable housing. But the people living there deserve a place with green areas. The neighbors deserve to have parking and not be concerned with excessive congestion, noise and pollution as people attempt to enter and exit the freeway nearby.

I appreciate you taking the time to read this. As a person overseeing the planning division I realize you see a need to grow and have the city prosper, but also to keep the specialness of a community as an integral part of the process.

Best regards,
Jenny Hove

G-1 Introductory comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

G-2 See response to comment B-1 regarding the historic value of the remaining adobe.

G-3 Comment noted. The issues related to parkland, traffic, noise, and air quality are addressed in the IS/MND. Please refer to Sections XV(iv), XVII , XIII, and III, respectively.

Letter H

From: Rex J. Little <adobe622@yahoo.com>
Sent: Friday, March 27, 2020 5:25 PM
To: Jay Paul; Bill Martin
Subject: [EXT] Re: Hacienda de Vega Project Status

Comments on the Project.

H-1 1. 42 units. My understanding is that there will be a mixture of 2 & 3 bedroom units.
2. Access is from S. Escondido Blvd. No other way in or out.
3. S. Escondido Blvd. would be improved on the East side with curb/gutter and sidewalk. No improvement on the West side.
4. Access from S. Escondido Blvd. would be from a left turn lane into the driveway of the project.
5. Thus far we have vehicular traffic with one way in and one way out. There is no South outlet from this property and in fact if Southbound a U turn is forced thus redirecting traffic North toward Brotherton.

H-2 6. In the real world the 42 units would probably develop close to a minimum of 84 vehicles. If (BIG if) all 84 vehicles were garaged thus leaving 12 of the 96 provided parking places open. BIG, BIG IF. Now more reality, are you ready for this? Because of current housing costs each unit could easily accommodate 3 or more adults including room renters. This could easily result in, possibly, 42 more vehicles. You are now at 126 vehicles for 96 spaces. With no additional parking on site and limited to no parking on South Escondido Blvd. Let us further complicate this disaster by having the unit owners using their garage space for storage thus removing at least 42 additional spaces.

H-3 7. Just curious, can you get a fire rig in and turn it in the complex? Remember there is only one way in & out!

H-4 8. Looks like this one needs a bunch more thought. It may not be a good fit for the location.

Rex Little
760-747-5656

https://www.escondido.org/2608-south-escondido-blvd-project.aspx

1

H-1 The comment's reiteration of project features is noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND. Proposed ingress/access to the site and turn movements have been considered by the City and project designed accordingly to conform to City requirements.

H-2 Parking is not considered as a CEQA impact, but rather a regulatory issue. Nonetheless, the 95 on-site parking spaces meets City Municipal Code parking requirements.

H-3 The project would conform to all City fire code regulations. The access and internal circulation roadways are designed with adequate turn radii to support fire and emergency vehicles.

H-4 Comment noted.

Letter I

From: Ben Loescher <bloescher@lma.la>
Sent: Monday, April 6, 2020 4:38 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] ENV 19-0007

Dear Mr. Paul,

I-1 I am writing to urge the City of Escondido to reject the proposed Mitigated Negative Declaration for the project at 2608 S. Escondido Boulevard. As you are no doubt aware, the site is currently occupied by the Paxton Adobe which is a regionally significant structure both architecturally and historically. Escondido is unique in Southern California for its quantity and quality of mid-century adobe buildings, and this structure is a particularly important contributor for its association with Charles Paxton who fabricated the adobes and participated in the construction of many of these buildings.

Because of the importance of this resource, the impact that the proposed demolition of this structure is not mitigated in any sense, and it is evident from the document that the applicants have made no attempt to study alternatives that would obviate destruction of the structure. Please consider the following:

I-2
- Contrary to the NOI, the project as proposed will have a significant aesthetic impact on the environment as a notable architectural building will be replaced with a unremarkable and generic residential complex for which it appears no design effort has been made except to maximize floor area. It will significantly detract from the aesthetic experience of the area.

I-3
- The proposed MND incorrectly indicates that "less than significant" impact would be made to Cultural Resources by the proposed project, mostly based on the finding that seismic improvement is infeasible. This conclusion is not warranted and needs to be made by a structural engineer who routinely works on adobe buildings. Significant work has been made in the last twenty years on techniques for seismic stabilization of adobe buildings not requiring the addition of rebar or impact on historically contributing fabric (most notably by the Getty's Seismic Adobe Project) which are not addresed here. A qualified structural engineer with demonstrated experience using current best practices for improving the seismic performance of earthen buildings should be engaged to evaluate the structure.

Please do not hesitate to contact me if you have any questions,

Best,

Ben

Ben Loescher AIA | LEED AP
p: 310-745-9211
e: bloescher@lma.la

I-1 See response to comment B-1 regarding the historic value of the remaining adobe.

Section V of the Final IS/MND (Part II) has been updated to provide additional details regarding potential project alternatives. See also the Errata included as part of the final document.

I-2 The project's potential effect on the visual character of the surrounding environment was evaluated in the IS/MND, Section I. As discussed therein, the site currently supports an abandoned building and remnants of the previous use. The site is surrounded by existing multi-story/multi-family and a hotel use and is located within an area designated in the General Plan and zoning code for residential uses. While the project would alter the existing condition of the project site, the project would be in conformance with development requirements for height, setbacks, and allowed density contained in the South Centre City Specific Plan, along with the Specific Plan design guidelines and open space requirements. The design of the project also would be compatible with the character of other existing multi-family residential, hotel, and other uses surrounding the project site. Therefore, it was determined that the project would not degrade the existing visual character or quality of the site and its surroundings, and impacts would be less than significant [see IS/MND Section I (c)].

I-3 The IS/MND found that impacts to cultural resources would be less than significant with the incorporation of mitigation measures. In other words, the structure was found to be a historic resource, the loss of which would be significant. However, with the mitigation measures proposed, historical preservation through documentation and the feasible reuse of salvageable materials would be required. Implementation of mitigation measures MM-CUL-1 through MM-CUL-3 would reduce the significant impacts associated with the demolition of a historical resource to a less than significant level. Section V of the Final IS/MND (Part II) has been updated to provide additional details regarding physical alternatives to the approach of the on-site structure. Specifically, based on an evaluation of the building, the structure is structurally unsound and does not currently meet building code requirements for commercial and/or residential structures, specifically earthquake compliance. The cost associated with rebuilding the structure would make the proposed project financially unfeasible from a total development cost standpoint. See the Errata included as part of the final document.

Letter J

From: Ted Matsuoka <ttmatsu@pacbell.net>
Sent: Sunday, April 5, 2020 3:45 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Case No. ENV 19-0007

Hi Jay,

J-1 Hope you are doing well. I'm wondering if Escondido is doing anything regarding the Citracado and Escondido Blvd intersection? With 3 high density projects already in place next to that intersection and this being the fourth, it is adding to the problem at that intersection. During rush hour, traffic attempting to turn from Escondido Blvd to Citracado West-bound is a real problem. One of the city engineers stated that Southbound Escondido Blvd would get a left turn/straight through lane so those people could bypass the people turning West on Citracado but that didn't happen when Escondido Blvd was recently repaved.

Turning Westbound from Northbound Escondido Blvd during rush hour is dangerous since one usually has to wait for a green light on Citracado and Center City so there is room to turn onto Citracado and you have to look for traffic coming East on Citracado, Northbound Center City turning East on Citracado, and whether the drivers Westbound Citracado and Southbound Escondido Blvd yield the right of way (which they sometimes fail to do).

Two mitigating steps should be considered:
1) The previously mentioned through and left turn only lane on Southbound Escondido
2) No turn on red for Northbound Center City to Westbound Citracado

With traffic at that intersection getting worse (other than during this Stay-at-home period), I've observed more people making an illegal turn from Cranston Dr (that's that google maps labels it - it's the access road between Ryan and Citracado on Escondido that connects to Center City) to Southbound Center City.

J-1 The traffic analysis accounted for the existing conditions along Citracado Parkway at Centre City Parkway and at South Escondido Boulevard and determined that the project traffic would not exceed the City's impact thresholds thereby there were no direct project impacts even though the intersections may be considered by some as difficult to navigate, pursuant to the CEQA analysis impacts would be less than significant.

Letter K

Jay Paul

From: Gayle Powers <gaylepowers@sbcglobal.net>
Sent: Friday, March 20, 2020 10:48 AM
To: tgcassolato@gmail.com; Lisa Walker; fox@escondidohistory.org; adobe622 @yahoo.com; rwsharp222@gmail.com; Lisa Walker
Cc: Jay Paul; Dolores Christensen; "Efraín R. Pedroza"; Bonnie; alfonso@haciendadevega.com; afinestone@escondido.com; Lucy Berk; pam.kragen@sduniontribune.com
Subject: Hacienda de Vega & beyond

Good Morning Escondido

K-1 My name is Gayle Powers and I live in Escondido near the old adobe that we still refer lovingly to as "Hacienda de Vega."
Below is the thread of communications that began on Tuesday, March 17th around 1:00 when I noticed the sign posted on the site of Hacienda De Vega.
That is what led to the information later in the afternoon responding to questions I was asking concerning the demo of the Adobe House that sits on the property.

Hopefully the brief introduction and the emails below will allow for complete and timely transparency to ensure all interested parties have the information
necessary to be empowered. Just as important it will allow for all who have a love for Escondido to work together in ensuring what makes a great city/the heart and soul is not excluded nor minimized in partnering with developers and our business community. At the same time there will be a difference of opinions, definitely different agendas but hopefully the common goal we can agree on is the Excellence of our great city of Escondido.

The beautiful "E" public art stature on Center City just north of Felicita is a great example and reminder of what I call "Exciting, Extraordinary Escondido! By the way we could utilize "e" words in creative learning exercises that incorporate art projects in our school districts -what do you think?

"Timing is everything" considering all that has been put on hold due to the global pandemic. Recognizing that must take priority especially for those that are currently balancing school children and working from home.
My hope that taking this pause and allowing more time to gain more information and answers works in everyones favor; allowing Escondido to seize the moment to ensure that city planning along S. Escondido is a grand vision that at the same time supports affordable high density housing, Also important to understand developers have the right to make a fair profit and this is not about fighting progress. Endless litigation doesn't move us forward and we all pay the price.

With all this said, yesterday when I saw the finished "Escondido" bridge way that also is public art including the mosaic stone was beyond inspirational.
Along with all the rainbows over Escondido the last several days its an excellent reminder of what can happen when we all work together.

Escondido Shines
On the high road,
gayle powers

1

K-1 Comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

Begin forwarded message:

From: Gayle Powers <gaylepowers@sbcglobal.net>
Subject: Re: [EXT] Re: Hacienda de Vega
Date: March 19, 2020 at 11:37:21 PM PDT
To: Jay Paul <jpaul@escondido.org>
Cc: Lisa Walker <information@oldescondido.org>

Hi Jay Paul,

K-2 Thanks for the additional information. March 16, 2017 date mentioned below -thinking you meant 2020.
I have had a chance to gather information, read reports and now have a better understanding. As someone who does believe high density housing near transportation corridors is smart city planning
it makes sense that the corridor of S. Escondido be utilized for various housing projects.

In the link you provided in both emails I didn't see a 3-d model of what the project is going to look like; perhaps I missed it? If you can instruct me under what
report I can find it would be helpful. Assuming there is a 3-d model and if not in the reports; can you take a photo and email it to me?

Considering the new apartments, the two current condo complexes already located on S. Escondido Blvd., along with the one below in the making and the closing of the Christmas Store just north; as well as the motel between new condo site and newly remodeled Baps it appears the entire strip will be high density housing of some kind. The motel owner who bought it 2 years ago stated he would be interested in selling it
to allow further development.

The storage facility that is in construction behind the corner gas station and across the street from the cluster of single family homes will serve for the extra storage needs of those living in
the condos- very convenient.

What I have noticed throughout Escondido is lack of landscaping in regards to the high density complexes. It is concerning not only for lack of aesthetic value
but the environmental impact as well. The lack of trees and plants appears to be only what is minimally required especially compared to similar projects along the coast, Rancho Bernardo and more affluent areas of the county. It appears Escondido gets slighted when it comes to requiring more space for "the green element" crucial to smart and healthy city planning. Why do we not require a higher standard in that area when negotiating projects with the developer?

Is the Planning Dept. recommending putting in a small park and a community garden to provide vital elements for successful high density housing? It should face Escondido Blvd. and be large enough to accommodate

2

K-2 Comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

some kind of play equipment for children. It also has to be established as a walk to neighborhood park; no concrete parking lot or that would defeat the purpose (other than the required handicapped spaces).
Is there going to be a continuous sidewalk along the corridor? One of the important factors of high density housing is to lessen the impact of traffic and promote walkable communities- is that correct?

I guess what I'm asking is there an overall plan/bigger picture for this corridor that includes mentioned above? Recognizing the City of Escondido would need to purchase property along the corridor to make this happen - is that been discussed or recommended to the City Manager and City Council by the Planning Dept?

The opportunity to develop the S. Escondido Corridor to be an extraordinary entrance to Escondido must not be overlooked. There is enormous potential to plan and element an exciting entrance into our great city.
Just like the new sign on Grand; continuing the momentum that is giving Escondido a great recommendation of a unique community that is a mix of small town feel yet very hip and artsy with a diverse population
that provides a quality lifestyle still affordable.

Seize the moment and make it happen - look forward to your response.and robust discussion.
Again thanks for your quick response and valuable information.

gayle powers

On Mar 19, 2020, at 5:27 PM, Jay Paul <jpaul@escondido.org> wrote:

Ms. Powers:

I was at the City's Emergency Operations Center (EOC) this afternoon and just returned to the office and got your phone message. On March 17th I left a message on your voice mail and also sent an email to provide some recent information and background on the proposed project and status of the draft environmental document that is out for public review (see email below dated March 17, 2020). You indicated that you wanted information regarding the current environmental document that is out for public review and it is available for public review on the city's web site at the following link: https://www.escondido.org/2608-south-escondido-blvd-project.aspx. The draft environmental document also includes a site plan, concept landscape plan and also renderings of the two front buildings (colored architectural renderings). The public comment period began on Monday, March 16, 2017 and will end on Monday, April 6, 2020. The draft environmental document also includes a copy of the historic building assessment for the adobe structure. I have provide a list of the following steps that will be required for the proposed project to proceed to a final decision by the City Council at a noticed public hearing and what has taken place so far. City Hall is closed to the public and all non-essential meetings have been cancelled. We are still processing projects

3

and development plans, but any submittal of plans or issuance of permits is done by appointment only at this time and the number of appointments is limited per each Department per day to limit public contact.

10-8-19 Project Submitted and routed for initial Department and Agency comments

10-25-19 Begin initial notification and consultation with Native American Tribes (per Assembly Bill 52) regarding any potential impacts to Tribal Cultural Resources. The draft IS/MND include mitigation measures to address potential impacts, include monitoring by tribes during project construction.

1-7-20 Neighborhood Meeting (noticed mailed on 12-20-2019) conducted by the project applicant at City Hall. City staff also were present at this meeting to explain the entitlement, environmental review and hearing process. Notice of the neighborhood meetings was mailed to property owners within 500 feet of the property, along with notices sent to all member of the Historic Preservation Commission, Planning Commission and City Council. Approximately 12 members of the public attended this meeting, including members of the HPC and Planning Commission.

3-10-20 Draft Initial Study/Mitigated Negative Declaration issued for the proposed project and notices mailed out to property owners within 500 feet of the project site, including all HPC members. The notice was published in the local newspaper on March 12, 2020 and the official public review period for the environmental document began on March 16, 2020 and will end on April 6, 2020. Once the public comment period has ended, the Planning Commission and City Council must adopt a final version of the IS/MND as part of the overall project approval at noticed public hearings. The PC and CC also must consider written comment (letters or email) received regarding the draft IS/MND during the public comment process. Any written correspondence received during the public review period (related to the environmental document) or any written comments regarding the overall project are included in the staff reports that the PC and CC will receive.

3-19-20 Historic Preservation Commission hearing scheduled to consider the proposed Non-Emergency Demolition Permit for the demo of the adobe structure on the site. Notices for the HPC hearing were mailed out to all property owners within 500 feet of the project site with a notice published in the newspaper and a 2' x 3' public hearing notice sign posted on the site. The HPC hearing has been postponed due to the public health safety issues related to

the Coronavirus. A new HPC meetings will be scheduled and new public notice provided. A new sign has been posted on the site informing the public of the hearing cancellation and notices were mailed to the surrounding property owners informing them the meeting had been cancelled.

Remaining Process:

- Finalization of project design/plans based on City and public input
- Conclusion of the public review process for the draft IS/MND and preparation of the final IS/MND
- HPC public hearing regarding the demo permit (to be scheduled at future date) The HPC provides a recommendation to the City Council regarding the requested demo permit
- Planning Commission public hearing (to be scheduled at a future date). The Planning Commission will consider the project, environmental review and demo permit and provide a recommendation to the City Council
- City Council public hearing (to be scheduled for a future date). The CC will make a final recommendation regarding the project, environmental review and demo permit.

Jay Paul
Senior Planner
Community Development Department | City of Escondido
Direct: 760-839-4537
jpaul@escondido.org

Letter L

To: City of Escondido Planning Department
From: Carol Rea
Re: Mitigated Negative Declaration for 2608 S. Escondido Blvd. Project
Date: April 6, 2020

L-1 My response to the Historic Structure Assessment of the Mitigated Negative Declaration for the 2608 S. Escondido Blvd. project (which I refer to as the Paxton Adobe) is based on my knowledge and experience in the field of Historic Preservation and Escondido history. I have been a member of the Escondido Historic Preservation Commission since 2010 and am currently the Chairman. I am also the Vice President of the Escondido History Center Board of Directors and, for many years, have served as a docent for the historic walking tours that the History Center sponsors. I have performed extensive research on numerous historic homes throughout Escondido in order to write copy for more than a dozen Old Escondido Mothers Day Home Tour programs and to complete various DPR forms for owners of historic homes as part of their local register applications. I have some knowledge of adobe buildings, having also volunteered as a docent for multiple annual Adobe Home Tours sponsored by the San Diego Adobe Heritage Association. Specific to this project, as a member of the Historic Preservation Commission, I was provided a tour of the Paxton Adobe grounds by Brian Jenkins, principal with Forsite Commercial Property Advisors, on February 20, 2020 to examine the exteriors of the buildings in anticipation of a scheduled vote regarding a non-emergency demolition permit, although the meeting was cancelled due to the COVID-19 situation.

First, it's unfortunate and distressing that a historic building that was **honored by the mayor and city council only five years ago**, has suddenly been determined by this assessment to not be historically significant and lacking value to the community. At the May 6, 2015 City Council meeting, May was proclaimed Historic Preservation Month and our adobe construction heritage in Escondido was the focus of the annual presentation. That year, only three certificates were awarded and one went to Ben Cueva, owner of the property defined as a "fine example of adaptive reuse." A PowerPoint presentation, which can be found at https://www.escondido.org/Data/Sites/1/media/pdfs/HistoricPreservationAwardsMay2015.pdf, was shown during the award ceremony that was developed by the Historic Preservation Commission. It included commentary that "After visiting this California Ranch style home of Charles H. Paxton in the late 1940's, L.R. Green was inspired to form the Adobe Block company in 1949. The home would later become a prime example of adaptive reuse as the Hacienda de Vega restaurant." The next slide provided information about the Adobe Block Company established by L.R. Green, who is also connected to the history of the Paxton adobe. "Located on 100 acres in what is now Kit Carson Park, the Adobe block company produced millions of bricks using soil from that location. L.R. Green used some of the adobe block for his own home construction business but most of the blocks made there were sold to other builders throughout Southern California. The plant would turn out bricks for about 20 years." A proposal to demolish a property so recognized by the city's top officials is insulting and detracts from all other recipients of historic preservation awards over the years.

L-2 The contents of the historical assessment I am addressing are disappointing due to the lack of accuracy and research and should not be well regarded. Referencing National, State, and Local register criteria, the assessment downplays the adobe's historical significance using flawed arguments. The truth is that **the Paxton Adobe would most definitely qualify for both the California Register of Historical Resources (CRHR) and the City of Escondido Historical Register, and might even qualify for the National Register.**

Responding to the assessment's review of California Register of Historical Resources criteria - of the four criteria required for the CRHR, only one must be met for qualification.

L-3 Criterion 1 states that "It is associated with events that have made a significant contribution to the broad patterns of California's history and Cultural heritage." According to the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation* referenced in the assessment, "A property can be associated with either (or both) of two types of events:… A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation." **Because the Paxon Adobe was a model home for a unique all-adobe neighborhood, it helped launch a mid-century adobe building industry in San Diego County, if not the state.** Additional historical events follow in my response to the Local Register criteria. (p. 12, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf)

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L-1 Introductory comments noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

L-2 As stated in the Historic Structure Assessment for 2608 South Escondido Boulevard (Smith and Stropes 2018; Historic Report):

> The Spanish Colonial Revival-style adobe brick building at 2608 South Escondido Boulevard was evaluated as eligible for designation on the City of Escondido Register under eligibility Criteria 1, 3, 5, and 7. However, the building only retains two of seven original aspects of integrity, is structurally unsound, and does not currently meet code requirements for commercial and residential structures, specifically earthquake compliance, due to a lack of structural framing (as noted on the building record).
>
> Conversion of the building into a restaurant in the 1960s negatively impacted the building's overall integrity. Modifications made to the building since its conversion into a restaurant include: a large kitchen addition at the northeast corner of the building; conversion of the window on the west wing into a set of double doors; replacement of a window frame on the west wing; installation of a door opening on the south façade; replacement of all exterior doors; application of plaster patches on weathered portions of the west and south façades of the west wing; construction of pergolas and patio covers in the front and back yards; enlargement/enhancement of the adobe brick wall surrounding the property; construction of parking lots; replacement of the original roof underlayment; and the addition of the stone walkway, fountain, and backyard landscaping. Although the building is still recognizable as the adobe brick residence constructed by Paxton, the modifications made to the building negatively impacted its original integrity of design, materials, and workmanship.

L-2 (cont.)

The California Office of Historic Preservation Technical Assistance Series #6 states that "integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association" (Office of Historic Preservation 2011). In addition, although the bulletin also states that, "A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data" (Office of Historic Preservation 2011), the 2608 South Escondido Boulevard building does not possess any specific elements suggesting that it has the potential to yield additional historical information or specific data important to the history of California beyond what was provided in the 2018 Smith and Stropes study.

Although CEQA and City of Escondido requirements do not require evaluation under the National Register of Historic Resources (NRHR) criteria, the overall loss of integrity that has made the building ineligible for the CRHR would also render the building ineligible for listing on the NRHP. As the building retains only two of the seven aspects of original integrity, the evaluation found that the building retains enough integrity to be eligible for the City of Escondido Register but not for the CRHR. Despite an overall lack of integrity, the building is still eligible under the City of Escondido Register criteria as the Escondido Municipal Code does not require an integrity analysis.

L-3 As stated in the "Historic Structure Assessment for 2608 South Escondido Boulevard" (Smith and Stropes 2018):

> The 2608 South Escondido Boulevard property is associated with Charles H. Paxton, who contributed to the development of adobe brick residences in the city of Escondido and the county of San Diego in the 1940s and 1950s. Not only did Paxton design and build the 2608 South Escondido Boulevard building, he also partnered with Lawrence Green and helped manufacture the adobe bricks used in the construction of both the subject building and various other residences within Riverside, Orange, Imperial, and San Diego counties. Paxton lived in the 2608 South Escondido Boulevard building after it was built and it also functioned as a model home for the Longview Acres Estates adobe brick subdivision. The

L-3 (cont.)

> detached garage originally functioned as the sales office for the subdivision. Due to the property's association with Paxton and his contributions to the development of adobe brick manufacture and the construction of adobe brick residences, the 2608 South Escondido Boulevard property is eligible for designation under City of Escondido Criterion 1.

The building is eligible for designation under City of Escondido Criterion 1 due to the influence that Paxton had upon the mid-century adobe building industry in Escondido. However, no evidence could be located suggesting that this model home, specifically, "helped launch a mid-century adobe building industry in San Diego County, if not the state." The 2608 South Escondido Boulevard building was constructed in 1946, six years after the period of significance began for the proposed "Mid-20th Century Adobe Thematic Historic District" in La Jolla (Donaldson et al. 2004):

> Adobes identified in La Jolla reflect a renewed appreciation for a method of construction used in early California and indigenous buildings. This local trend was reintroduced by the Weir Brothers, and Charles McCauley who helped land owners build and/or design their own adobes with do-it-yourself adobe brick techniques. During the 1940s, the US Department of Agriculture also promoted adobe and earthen architecture that was suitable for living and low cost to build … Sim Bruce Richards, architect, was known to use adobe in this manner. (Donaldson et al. 2004)

As this trend was already underway prior to 1946, and the establishment of Paxton's building block company occurred between 1942 and 1945 in La Jolla, both prior to Paxton's construction of the 2608 South Escondido Boulevard building, it was not responsible for this movement and is not representative of "A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation" (Andrus and Shrimpton 2002). Therefore, the 2608 South Escondido Boulevard building is not eligible for designation under CRHR Criterion 1.

L-3 (cont.)

In addition, modifications made to the building after it was constructed altered its original design, setting, materials, workmanship, and feeling. Page 48 of the National Register Bulletin: How to Apply the National Register Criteria for Evaluation states that the building "must have demonstrated its ability to convey its significance" and that "a property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity" (Andrus and Shrimpton 2002). The example provided by Ms. Rea in Comment 3 states that "a mid-19th century water-powered mill important for its association with an area's industrial development is not eligible if: substantial amounts of new materials have been incorporated (Materials, Workmanship, and Feeling), or it no longer retains basic design features that convey its historic appearance or function (Design, Workmanship, and Feeling)." Due to the modifications made to convert the 2608 South Escondido Boulevard residence into a restaurant in 1962 and subsequent changes, it no longer conveys a sense of a 1940s single-family residence designed as a model home.

L-4 CRHR Criterion 2 requires that a property be associated with the lives or persons in our past. **The assessment is correct in acknowledging Charles Paxton as an important person associated with it and further research shows multiple other significant community members associated with the Paxton Adobe, including several notable Hispanic persons, previously underrepresented among Escondido's historic resources.** Thus, the criterion is fully met. Unfortunately, the assessment ends its Criterion 2 comments with a listing of modifications that are not necessarily accurate and in spite of the fact that the information is irrelevant to this specific criterion. Furthermore, the gradual evolution from a residential use to a repurposed commercial use is actually an intrinsic part of the contextual history of this building and the history of South Escondido Blvd.

L-5 CRHR Criterion 3 requires that a property embody characteristics of construction, represents the work of an important creative individual or possess high artistic values. As the summary correctly states, albeit in a convoluted manner, the Paxton Adobe meets the requirement. Citing the same National Register Bulletin quoted in the assessment, *How to Apply the National Register Criteria for Evaluation*, "**A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.**" (page 19, current on-line version https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf)

L-6 According to CRHR Criterion 4, if a property has "yielded, or may be likely to yield, information important in prehistory or history," it can qualify for listing. The aforementioned Bulletin further specifies, "A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development." (p. 21) **As the model home for the unique Longview Acres all-adobe development and other adobe homes to follow, the Paxton Adobe could certainly yield further important information and qualifies under the 4th Criterion.** And yet, the assessment stated that the Paxton Adobe would be "unlikely" to contribute additional information beyond what it presented and "further research would not provide any additional information pertinent to the history of the city of Escondido or the state of California." In other words, even though further research, indeed, shows that **the Paxton Adobe qualifies for the fourth criterion in addition to the previous three CRHR criteria, when only one is required**, the assessment deems it not worthy of protection.

L-7 Responding to the assessment's review of City of Escondido Historical Register criteria - only two of the seven are needed to qualify for placement on the City's Local Register.

Criterion 1 is clearly met because the Paxton Adobe is "strongly identified with" several persons who contributed to the culture, history, and development of the city of Escondido. The assessment agreed, although based only Charles Paxton's connection.

Criterion 2 is clearly met because the Paxton House, as a mid-century adobe unique to the southwestern United States with Spanish Colonial Revival influences, "embodies distinguishing characteristics of an architectural type" and "has not been substantially altered." **The assessment acknowledges that the structures exhibit distinguishing characteristics of an architectural style, which is sufficient to qualify the resource under this criterion, potentially securing listing status as the second required.** Unfortunately, the assessment goes into needless unrelated detail, some of which is blatantly untrue, listing numerous alterations that were made in 1962 when the residence was repurposed as a restaurant, in order to conclude that the property has an "overall loss of integrity." Adding a kitchen at that time and possibly modifying some doorways happened more than 50 years ago, which means that, collectively, they also qualify as historic. The assessment erroneously states multiple times that the garage was modified to include a bar, which is patently untrue as early photographs show that Paxton built the outdoor bar to enhance poolside entertaining at his home. Other homes built in Longview Acres were designed with this feature, as well. The "application of plaster patches on weathered portions" should not be considered an alteration, but intended maintenance of an adobe building. The assessment also states that all exterior doors were replaced but no documentation or date of replacement is included. On page 9 of the assessment, a long list of modifications mentions that several of them were made "at unknown dates," so it would be difficult to prove that they were not made more than 50 years ago. In truth, comparing on-site inspection to older family photographs and drawings reveals that the original exterior of the building is surprisingly intact. Original adobe brick, most original wood-framed windows, terra cotta tile roofing, outdoor bar and garage, and more, are still present.

2

L-4 The "listing of modifications" provided in Smith and Stropes (2018) under CRHR Criterion 2 were provided in order to reiterate that the building no longer retains enough original integrity to be considered eligible for listing under the criterion (see response to comment L-2, above). The kitchen addition, completed in 1962, is the only modification made to the building that is historic in age. The remainder of the modifications that have negatively impacted the building's integrity are not historic in nature and, therefore, have not achieved significance in their own right. As such, they do not serve as "an intrinsic part of the contextual history of this building." Further, all of the listed modifications negatively impacted original elements associated with Paxton, since he was not involved in the conversion of the building into a restaurant. Because the building derives its local significance from its association with Paxton as an adobe, single-family residence designed as a model home, as with CRHR Criterion 1, the building "must have demonstrated its ability to convey its significance" (Andrus and Shrimpton 2002). The same aspects of integrity relevant to evaluating the building under CRHR Criterion 1 apply to its evaluation under CRHR Criterion 2, as "a property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity" (Andrus and Shrimpton 2002). As was detailed in response to comment L-3, above, the building no longer retains integrity of design, materials, setting, workmanship, or feeling, and is no longer able to convey an association with Paxton.

L-5 The 2608 South Escondido Boulevard building no longer retains enough original integrity to be eligible for listing under City of Escondido Criterion 2 or CRHR Criterion 3 (see responses to comments L-2, L- 3, and L-4, above). Page 48 of the National Register Bulletin: How to Apply the National Register Criteria for Evaluation states that the resource "must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association" (Andrus and Shrimpton 2002). Conversion of the building into a restaurant in the 1960s negatively impacted its original design, materials, workmanship, setting, and feeling, rendering it not eligible for designation under CRHR Criterion 3.

L-6 The 2608 South Escondido Boulevard building was constructed using adobe bricks produced by the Adobe Brick Manufacturing Company that were locally sourced from the old “Caladobe” plant formerly owned by Foster & Kleiser Co., which was located “3 miles south of Escondido and 1 mile north of the Lake Hodges bridge” *(San Diego Union* 1949). It is unlikely that the property will yield additional information important in prehistory or history as the method for creating the adobe bricks and the methods of construction used for the residence are already known. A *San Diego Union* article from 1949 describes the process that the Adobe Brick Manufacturing Company used to create the bricks:

> A machine first digs the earth and carries it to a plant which mixes oil with the dirt and stirs it into an adobe mud. From a hopper, the mud is delivered to another carrier which transports the mixture to a portable contraption that moves down the lithe, molding the bricks and depositing them on rolls of paper to keep the brick clean.

The residence itself was constructed in the same manner as most Adobe Revival Period buildings constructed between 1915 and 1948, where adobe walls were “placed on a raised concrete foundation and the floor is slab on grade” (City of San Diego 2000). It is known that the building was constructed on a concrete foundation and lacks structural framing because this information is provided on the Residential Building Record. The building also possesses “bond beam[s] on top of the adobe wall” (City of San Diego 2000) designed to distribute “the weight of the roof along the wall” (Nelson 1978). Although it is common for Adobe Revival Period adobe homes to have the walls completely encased in cement plaster and the building to exhibit “large wood or steel framed windows,” these elements of Adobe Revival Period construction were not applied to the 2608 South Escondido Boulevard building (City of San Diego 2000). As such, as stated in Smith and Stropes (2018), “further research would not provide any additional information pertinent to the history of the city of Escondido or the state of California.”

	L-7 The listing of alterations made to the 2608 South Escondido Boulevard building is relevant to the evaluation and was not conducted "in order to conclude" that the property has limited integrity. The original fabric of the building is important to consider when evaluating whether or not it embodies distinguishing characteristics of an architectural type, since substantial alterations negatively impact a building's ability to convey those characteristics. Even those modifications made to the building over 50 years ago were conducted after the original construction of the building and altered or removed elements that were part of the original design. Although the building still possesses some characteristics of the Spanish Colonial Revival style, it has been substantially altered, and according to City of Escondido Criterion 2, a resource qualifies if it "has not been substantially altered." It would be inconsistent with the review criteria to infer that alterations conducted over 50 years ago are acceptable as historic and treated in a like manner as the original structure. Everything that meets the 50-year age threshold to be considered historic under CEQA does not automatically become historically significant. While the alterations negatively impacted the building's original integrity, the Escondido Municipal Code does not require an integrity analysis. Further, the modifications made to convert the building into a restaurant also negatively impacted the building's ability to convey the distinguishing characteristics of an architectural type or specimen (Spanish Colonial Revival, single-family residence/model home).

L-8 Criterion 3 is clearly met for reasons beyond those connecting the adobe bricks with Paxton, but the assessment appropriately states that the Paxton Adobe "is eligible for designation under City of Escondido Criterion 3." **Along with Criteria 1 and 2, this is more than sufficient for local designation.**

L-9 The assessment's denial of designation for Criterion 4 does not consider that, **as a sales office for Longview Acres, the garage was the site of the first sales of homes in the first all-adobe neighborhood in North San Diego County** and that, later, numerous organizations met at the restaurant and made significant contributions to the community over the years.

L-10 **Criterion 5 requires that the property be more than 50 years old and the assessment does not deny that the Paxton Adobe is "eligible for designation under City of Escondido Criterion 5."** It is important to keep in mind that most of the alterations are also more than 50 years old and have become part of the property's history. That makes four criteria met according to the assessment, one more than what is needed for historical designation.

L-11 Criterion 6 states that the historic resource must be "an important key focal point in the visual quality or character of a neighborhood, street, area, or district. **While, at one time, the residence sat alone along Escondido Blvd., the Longview Acres neighborhood can still be seen on the hill beyond it.** True, there is infill of buildings adjacent to the property, but not sufficiently to disqualify meeting this criterion.

L-12 According to the assessment, the Paxton Adobe is "eligible for designation under City of Escondido Criterion 7," possessing "one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type." **This makes the fourth of seven criteria acknowledged by the assessment to support local register status, twice the necessary number, although by my interpretation, it has met all seven.**

L-13 After fundamentally acknowledging that the Paxton Adobe meets the criteria needed for local designation, the assessment, in its Findings and Conclusions section, asserts that the "building… is structurally unsound, and does not currently meet code requirements for commercial and residential structures, specifically earthquake compliance…," **but not one report from a qualified engineer or adobe restoration specialist is included.** Further, the assessment states, "In order to meet code requirements, the adobe brick walls would need to be reinforced with rebar, which would involve both the deconstruction and the reconstruction of the building," although further investigation would definitely reveal more appropriate seismic retrofit methods that would retain the original building and not be as costly. The historic designation should not be disqualified due to shortcomings cited without substantiation.

L-14 Aside from the assessment, another argument to be made against bulldozing the historic Paxton Adobe is sustainability; "**The greenest building is one that is already built**," Carl Elefante, 2007. According to the groundbreaking study by the Preservation Green Lab of the National Trust for Historic Preservation, *The Greenest Building: Quantifying the Environmental Value of Building Reuse*, "Reuse Matters. Building reuse typically offers greater environmental savings than demolition and new construction. It can take between 10 to 80 years for a new energy efficient building to overcome, through efficient operations, the climate change impacts created by its construction. The study finds that the majority of building types in different climates will take between 20-30 years to compensate for the initial carbon impacts from construction."
https://forum.savingplaces.org/connect/community-home/librarydocuments/viewdocument?DocumentKey=227592d3-53e7-4388-8a73-c2861f1070d8&CommunityKey=00000000-0000-0000-0000-000000000000&tab=librarydocuments

L-15 Finally and perhaps most importantly, Level II HABS documentation suggested in the Mitigated Negative Declaration is not appropriate for this project; reducing a beloved and unique historical building to black and white photographs and verbiage would be a travesty. I recommend that, rather than bulldozing the Paxton Adobe, there is another option that has been implemented at least twice in Escondido. The oldest gas station on Escondido Boulevard was preserved as a community room for the surrounding Las Ventanas apartment units in 2008 and the Veterans Village, also located on Escondido Blvd., preserved several historic adobe buildings on the lot that were incorporated both as housing and office space in 2018. **The Paxton Adobe could be properly restored by professionals accustomed to working with adobe and used as rental office and community room space for the apartments that would surround it, making the new project a unique and desirable place for residents.** Please, let's not empty a prime piece of Escondido's built history into the dustbin.

3

L-8 The historic structure assessment for the 2608 South Escondido Boulevard building concluded that it is eligible for listing on the City of Escondido Register under Criteria 1, 3, 5, and 7 (Smith and Stropes 2018). See response to comment L-7, above, regarding eligibility under City of Escondido Criteria 1 and 2.

L-9 While it may be argued that the use of the garage as a sales office represents a historic trend that made a significant contribution to the development of the community, the garage is no longer able to convey this association. After the building's use as a sales office, the west façade was converted into a bar using red brick masonry and non-original doors and windows with metal roll-top doors were installed on the south façade. The use of the restaurant as the location of lunch and/or dinner meetings does not constitute an important historic event.

L-10 See response to comment L-8.

L-11 Currently, the 2608 South Escondido Boulevard building is surrounded on both sides by apartments and a hotel. The building no longer stands out amongst its surroundings and the Longview Acres neighborhood is not visible due to the number of trees obscuring the view. Therefore, the building is not eligible for listing on the City of Escondido Register under Criterion 6.

L-12 See response to comment L-8.

L-13 See response to comment L-8. The statement that the building does not meet earthquake compliance is based upon the building record noting that there is no structural framing, which does not discount the historic designation, but points out the potential costs involved in retrofitting and rehabilitating the building if it were to be preserved. Should the building be preserved, the cost of retrofitting the building and properly preserving and rehabilitating it is important to consider.

The National Park Service and the Getty Museum have published documents focused upon preserving historic adobe buildings (Nelson 1978) and providing planning and engineering guidelines for the seismic retrofitting of historic adobe structures (Tolles et al. 2002), respectively. The purpose of the historic structure assessment conducted in 2018 (Smith and Stropes 2018) was to assess the potential historic

L-13 (cont.)

significance of the structure. The recommendations made in the National Park Service and Getty Museum documents would constitute additional investigation of the building and include additional professional input from architects, seismic structural engineers, and multiple historians.

To preserve or rehabilitate a building, the National Park Service (Nelson 1978) states:

> When preservation or rehabilitation is contemplated for a historic adobe building, it is generally because the walls or roof of the building have deteriorated in some fashion—walls may be cracked, eroded, pitted, bulging, or the roof may be sagging. In planning the stabilization and repair of an adobe building, it is necessary:
>
> - To determine the nature of the deterioration
> - To identify and correct the source of the problem causing the deterioration
> - To develop rehabilitation and restoration plans that are sensitive to the integrity of the historic adobe building
> - To develop a maintenance program once the rehabilitation or restoration is completed.
>
> 1. **Whenever possible, secure the services or advice of a professional architect** or other preservationist proficient in adobe preservation and stabilization. Although this may be more costly than to "do-it-yourself," it will probably be less expensive in the long run. Working with a deteriorated adobe building is a complex and difficult process. Irreversible damage may be done by well-meaning but inexperienced "restorationists." Moreover, professional assistance may be required to interpret local code requirements.
>
> 2. **Never begin restoration or repairs until the problems that have been causing the deterioration of the adobe have been found**, analyzed, and solved. For instance, sagging or bulging walls may be the result of a problem called "rising damp" and/or excessive roof loads. Because

L-13 (cont.)

adobe deterioration is almost always the end product of a combination of problems, it takes a trained professional to analyze the deterioration, identify the source or sources of deterioration, and halt the deterioration before full restoration begins.

3. **Repair or replace adobe building materials** with the same types of materials used originally and use the same construction techniques. Usually the best and the safest procedure is to use traditional building materials. Repair or replace deteriorated adobe bricks with similar adobe bricks. Repair or replace rotted wooden lintels with similar wooden lintels. The problems created by introducing dissimilar replacement materials may cause problems far exceeding those which deteriorated the adobe in the first place. (Nelson 1978)

The National Park Service (Nelson 1978) also acknowledges:

> The preservation of historic adobe buildings, then, is a broader and more complex problem than most people realize. The propensity of adobe to deteriorate is a natural, ongoing process. While it would be desirable to arrest that process in order to safeguard the building, no satisfactory method has yet been developed. Competent preservation and maintenance of historic adobe buildings in the American Southwest must (1) accept the adobe material and its natural deterioration, (2) understand the building as a system, and (3) understand the forces of nature which seek to return the building to its original state.

These processes are costly and require, as Ms. Rea suggests, the input of various specialists to ensure that those steps made to rehabilitate or repair the building do not do more harm than good. However, the Getty Museum acknowledges that rehabilitation and repair of a building as it was originally constructed may not preserve the building, especially in California:

L-13 (cont.)

Earthquakes pose a very real threat to the continued existence of adobe buildings because the seismic behavior of mudbrick structures, as well as that of stone and other forms of unreinforced masonry, is usually characterized by sudden and dramatic collapse. There is also the threat to occupants and the public of serious physical injury or loss of life during and following seismic events. Generally speaking, it is the evaluation of the engineering community that adobe buildings, as a class, are more highly susceptible to earthquake damage than are the various other types of buildings.

Nevertheless, it has been observed that some unmodified adobe buildings have withstood repeated severe earthquake ground motions without total collapse. On this point, a prominent seismic structural engineer remarked, “The common belief that a building is strong because it has already survived several earthquakes is as mistaken as assuming that a patient is healthy because he has survived several heart attacks” (Vargas-Neumann 1984).

The seismic upgrading of historic buildings embraces two distinct and apparently conflicting goals:

- Seismic retrofitting to provide adequate life-safety protection
- Preservation of the historic (architectural) fabric of the building

These goals are often perceived as being fundamentally opposed.

If conventional seismic retrofitting practices are followed, extensive alterations of structures are usually required. These alterations can involve the installation of new structural systems and often substantial removal and replacement of existing building materials. However, historic structures so strengthened and fundamentally altered may lose much of their authenticity. They are virtually destroyed by the effort to protect against earthquake damage, before an earthquake

L-13 (cont.)

> even occurs. Thus, the conflict is seen to be between retrofitting an adobe building to make it safe during seismic events, at the cost of destroying much of its historic fabric in the process, and keeping the historic fabric of the building intact but risking structural failure and collapse during future seismic events. Faced with the apparent standoff between unacceptable seismic hazard and unacceptable consequences of conventional retrofitting approaches, the Getty Conservation Institute has made a serious commitment to identify and evaluate seismic retrofitting methodologies for historic adobe structures that balance the need for public safety with the conservation of cultural assets. The Getty Conservation Institute's Seismic Adobe Project (GSAP) is the manifestation of that commitment … (Tolles et al. 2002).

The Getty Museum also states that if these conditions have been observed:

> An architect, engineer, or architectural conservator may recommend various types of tests to obtain accurate information about important materials concerns. Included in this category are tests to analyze mortar, adobe, or fired bricks to determine their composition and material properties (strength, modulus of rupture) and geotechnical testing to identify soil conditions and verify geological formations and hydrological conditions below grade. The latter are indicated if any evidence of settlement or foundation deficiencies is observed …
>
> [However,] funding problems are one of the greatest deterrents to seismic retrofit projects everywhere. Commercial property owners cannot raise rents enough to cover the cost of a largely invisible upgrade. Similarly, a historic site cannot raise visitor fees sufficiently to finance a seismic retrofit project … In some instances, avocational archaeologists or student interns may be recruited to perform some tasks under professional direction. However, certain personnel substitutions or supposed economies, such as consulting a general contractor in lieu of an engineer to assess structural vulnerability and repair retrofit designs for unreinforced historic adobe buildings are not advisable and can raise liability issues in the event of casualties resulting from an earthquake (Tolles et al. 2002).

L-13 (cont.)

As recommended by the Getty Museum, the "Seismic Retrofit Planning Team" should include a preservation architect, an engineer, a social historian, an architectural historian, a conservator, and a historical archaeologist. Measures tested by the Getty Museum (Tolles et al. 2002) that would have minimal impact upon the historic fabric of a building include:

- upper- and lower-wall horizontal cables
- vertical straps
- vertical center-core rods [rebar]
- partial wood diaphragms
- wood bond beams
- floor- and ceiling-level connections between walls, joists, and exterior horizontal cables

Although the Smith and Stropes (2018) historic assessment for the 2608 South Escondido Boulevard building evaluated the structure as eligible for the City of Escondido Register under Criterion 1, 3, 5, and 7, as stated above, the modifications made to the building since its initial construction have negatively impacted its original integrity and have resulted in building conditions that would require additional investigations, likely resulting in costly repairs and retrofit solutions that would not be financially feasible for the current property owner to fund. Preservation is not mandated under CEQA but is a preferred alternative. Mitigation of impacts to this resource can be accomplished without preservation if preservation is both infeasible and not supported by the historic evaluation.

L-14 See response to comment L-8. The recommendations did not include "bulldozing" the building. The analysis concluded that preservation was not the only option to address impacts, but it does represent an expensive alternative and one that would not necessarily enhance the historic status of the structure.

L-15 HABS documentation is recommended by the National Park Service as mitigation documentation when historic properties will "be substantially altered or demolished by a federal agency's action." While no federal agencies are involved in the current project, documentation of the building utilizing Level II HABS guidelines was recommended prior to any alteration or demolition due to the conclusion that the 2608 South Escondido Boulevard building is eligible for listing on the City of Escondido Register under Criteria 1, 3, 5, and 7. If the building is

L-15 (cont.)

preserved in place, it should still be documented in its current state prior to undergoing any rehabilitation or preservation programs. There is no argument that the adobe structure could be restored to its original form; however, this action would also constitute an impact to the structure because the process would substantially alter the original design and construction techniques. If the preservation alternative is not consistent with the project design and would be an infeasible burden upon the project when preservation is not the only method available to mitigate impacts, the lead agency should allow whichever mitigation option is selected by the applicant, so long as the mitigation measures are supported by the CEQA process and ultimately reduce impacts to a level less than significant. The Level II HABS is an acceptable and completely adequate mitigation alternative given the significantly reduced integrity of the structure.

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2002 *Planning and Engineering Guidelines for the Seismic Retrofitting of Historic Adobe Structures.* The Getty Conservation Institute Scientific Reports series. J. Paul Getty Trust (Getty Publications), Los Angeles, California.

Letter M

From: Vincent Rossi <vincentnrossi@sbcglobal.net>
Sent: Sunday, April 5, 2020 3:53 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Against demolition of a historic building

Dear Mr. Paul:

M-1 I learned only in the last few days of the city of Escondido's proposal to proposal to allow demolition of the former Hacienda de Vega restaurant for the 2608 South Escondido Boulevard Project. I urge you to find an alternative to this demolition.

I'm a resident of the city of San Diego, but I'm also a freelance journalist and researcher with a special interest in history. I've written four books on San Diego County history and among my subjects have been historic properties including the Escondido Hotel, the Escondido Carnegie Library and the Escondido Creamery, all structures which were part of the city's life and historical memory but which are all now gone. I don't believe your city should lose any more historic structures if it can be helped. I've also seen the report on the property in question submitted to the city by Alexa Clausen, a former historian for the California State Parks Department, current volunteer with the Escondido History Center and a longtime researcher into adobe home construction in the region. Her report clearly demonstrates that the property is deserving of historic landmark status.

I urge the city to reconsider its decision and save this significant example of your community's history.

Sincerely,
Vincent N. Rossi

The San Diego History Seeker

http://sandiegohistoryseeker.comD

vincentnrossi@sbcglobal.net

858-245-8258

M-1 See response to comment B-1 regarding the historic value of the remaining adobe.

Letter N

From: Dr. Martos & Dr. Stuebe <chirosurf@sbcglobal.net>
Sent: Monday, April 6, 2020 2:37 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Paxton Adobe

N-1 Good afternoon Mr. Paul,
It has come to my attention that the Paxton Adobe will be demolished to make room for an apartment complex. I have read the historical review which states that the Paxton Adobe does not meet the criteria for preservation. This makes no sense. We have lived in Longview Acres in an adobe built in 1955 for 25 years. This neighborhood of adobes built during that period are all considered historical and qualify for the Mills Act to preserve historic dwellings. The Paxton Adobe was built in 1948 and has been used by the public for most of the years since 1948, primarily as a restaurant and gathering place.

https://adobehometour.com/wp-content/uploads/2017/10/Paxton-Adobe-1948-to-present-Hacienda-de-Vega.pdf

The City of Escondido has an opportunity to preserve a true historical adobe. It would be a great disservice to the city and the people of this region to allow the Paxton Adobe to be destroyed.

Sincerely,
Tom and Donna Stuebe

New Life Chiropractic Center
The Center for Cranial Therapy

Dr. Donna A. Martos 🕮 Dr. Thomas H. Stuebe
11650 Iberia Place, Suite 135
San Diego, CA 92128
858-674-1117
www.chirosurf.com
chirosurf@sbcglobal.net

N-1 See response to comment B-1 regarding the historic value of the remaining adobe.

Letter O

Maria A. Weir Werth
401 Apple Way * Tehachapi, CA 93561
(818) 521-3546 * mariaweirwerth@gmail.com

Mr. Jay Paul
City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025
jpaul@escondido.org

April 5, 2020

Sent via email

Subject: Comments on the Historic Paxton Adobe Home Demolition

Dear Mr. Paul:

O-1 When I saw the green tarp around the old Paxton adobe home my heart sank. I had a feeling then that you were planning on tearing the building down. I called the city and was told that was not part of the plan. It's hard to believe that your planning department would be considering this move during a time of a massive world crisis. But what perfect time to get an unpopular thing passed when most people are more worried about staying alive than preserving the city's history.

I grew up in Escondido and my father, Larry Weir, and uncle, Jack Weir, started building adobe homes in 1952 under the company name of Weir Brothers. I am very honored that the city chose to preserve one of my family's adobe homes just up the street from this proposed demolition. What is hard to believe is that the house on the chopping block is older and may be one of the oldest adobe homes in the City of Escondido among those which are from the era of mid-century adobe construction revival. I didn't see that addressed in the study and it would seem an important part of this "assessment."

. The *Historic Structure Assessment* did mention that the Paxton home was built as a model home for adobe homes in the area. The house was an inspiration to builders and architects and the beginning of the adobe building era. That was one of the reasons my family came to Escondido. How can the authors justify that there is no historical significance when its existence produced a modified Spanish revival building style that spread throughout the city and into the surrounding areas including Poway, Encinitas, Rancho Santa Fe, Pala Mesa and beyond.

1

O-1 Introductory comment noted. This comment does not raise an issue related to the substance or adequacy of the environmental analysis contained within the IS/MND.

I spent time last Fall in Escondido researching a book on my father's work in adobe construction. Initially, I was going to write a book on adobe construction in general but found so much history in just my father and uncle's work that I had to narrow the focus on their work. Adobe construction is a specialized trade and very few people are left to keep the legacy alive. That alone should make you take a second look at this project. That home or parts of it should be kept intact to preserve the history that is slipping away.

After reading through the report used to substantiate your plans, it became obvious to me that the authors have no adobe building expertise. The closest thing to adobe knowledge is a 2013 study for the Los Peñasquitos Adobe Drainage Project. Did that project include an assessment of the condition of its structure?

O-2 In addressing the conclusion that due to the lack of rebar the building is unstable, then every building built before the 1950's in the State of California (and beyond) would need to be torn down because they are unstable. In those days it is my understanding that the builders did use horizontal rebar every four courses or so when building adobe walls. They also used a twelve inch or more concrete bond beam across the top of the walls for added stability. The issue is vertical steel which didn't come into law until the 1970's. Have you ever tried remodeling an adobe home with sixteen-inch-thick walls? These buildings can take an enormous amount of shaking and have done quite well in earthquakes.

In the 1952 Tehachapi Earthquake, Portland Concrete presented a fraudulent study to the State of California. They claimed that every adobe failed in that earthquake. They thought adobe was going to take over as a building medium and attempted to get it outlawed even back then. My father and uncle flew up to Tehachapi to determine the extent of the damage and found the buildings that failed were the downtown red brick facades. The adobe buildings were in good condition, with little damage. The brothers presented their findings to the State and Portland Concrete did not show up to defend their unsubstantiated claims.

O-3 Your study showed that the Paxton home met 4 out of 7 Criterion and yet summarize with a mention about how expensive it would be to preserve the City's history. I wish to repeat the question: did the authors consult an adobe expert? Adobe is not comparable to other traditional building methods. Was an adobe architect or contractor consulted? In my many contacts and research of adobes, the oldest to the more recent adobes dating through California history have been stabilized or restored with the guidance of licensed and professional adobe constructions experts.

O-4 Escondido should embrace its adobe history instead of wanting to demolish one of the oldest adobe buildings in the city. It may be the oldest from the adobe revival era during the middle of the last century. Has that been determined?

2

O-2 See response to comment L-13.

The response of retrofitted buildings to several recent earthquakes has amply demonstrated that appropriate modification of buildings before a seismic event is a practical solution. A survey of historic adobe buildings damaged in the 1994 Northridge earthquake showed that retrofitted adobe buildings performed significantly better than those that had not been upgraded. However, damage repair and conventional retrofitting after a major earthquake can be very costly. It has even led, in some notable instances, to demolition of important landmarks for primarily financial reasons …

In recent years, the toll on historic California adobes that did not receive such preservation efforts has been dramatic. Recent losses to unstrengthened buildings include destruction of the San Fernando Mission Church in 1971; heavy damage to the Pio Pico Mansion in 1987; damage to the Rancho San Andres Castro Adobe and Juana Briones Adobe in 1989; and severe damage to the Del Valle Adobe at Rancho Camulos, the Andres Pico Adobe, the De la Ossa Adobe, and the conventos of the San Gabriel and San Fernando missions in 1994. Preservationists in the twenty-first century should continue to initiate and bolster preservation efforts by confronting, not backing away from, the challenge that earthquakes pose to many of the state's earliest cultural resources—the missions and other historic adobe buildings (Tolles et al. 2002).

O-3 Given the proposed project design, preservation is not the mitigation option selected by the applicant. The CEQA process ultimately requires impacts to mitigated, and in the case of the 2608 South Escondido Boulevard building, impacts to the historic structure can be mitigated to a level less than significant through the implementation of the HABS process.

O-4 While the 2608 South Escondido Boulevard building is eligible for the City of Escondido Register under eligibility Criteria 1 and 3 due to its association with Charles Paxton and both the Adobe Brick Manufacturing Company and the Adobe Construction Company, it is not the oldest building associated with the "adobe revival era," as the Adobe Revival Period in southern California, as identified by the City of San Diego, occurred between 1915 and 1948 (City of San Diego 2000), and the subject building was constructed in 1946, at the end of the period of significance.

Escondido could be known as a destination weekend getaway that would welcome people who are interested in adobe architecture. A driving tour of adobe homes should be made available for those interested in this work. Due to the changes in building codes, adobe homes are no longer built. There may be no adobe manufacturing brickyards left in California. You would have to travel to another state or country to see anyone building with adobe.

I urge you not to tear down Escondido's historical home. Adobe homes are so precious and no longer built. They are beautiful and significant. The adobe in an amazingly well insulated structure. They have an insulation factor that surpasses most building materials. The homes are warm in the winter and cool in the summer. If you ever lived in an adobe home like I have or spent time inside of one, you would have a change of heart.

Yours truly,

Maria A. Weir Werth

Maria A. Weir Werth
Former resident of Escondido
From 1953 – 1969
(1538 So. Escondido Blvd. and Windsong Lane)

3

Letter P

From: erik zedelmayer.com <erik@zedelmayer.com>
Sent: Monday, April 6, 2020 3:18 PM
To: Jay Paul <jpaul@escondido.org>
Subject: [EXT] Strongly against demolition of historic Adobe Structure (Case No SUB 19-0010)

CAUTION:This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Dear Mr Paul,

I live at 2655 Las Palmas Ave and look at the Hacienda de Vega site from my home (Case No SUB 19-0010).

P-1 Why would the city even consider allowing an owner of a property to demolish a historic classified adobe construction that is in great condition the last time I dined there? Those who purchase historic properties should know they must be preserved for future generations, not converted into additional high density multi-story apartment building that look completely out of place in this neighborhood, not to mention all the vehicles now parked on the city streets coming in and out of our rural neighborhood. As our community stewards, please use this to set an example to others that if someone purchases a historic property they must maintain and protect it.

P-2 Also- high density units belong in an urban downtown, and are obviously out of place in a beautiful rural community. I objected in person to both prior high density construction projects on the adjacent lots. When will the city draw the line? Please confirm that a public hearing will be rescheduled after the pandemic is over before any action is taken on this property.

Thank you for your consideration,
Erik & Christine Zedelmayer
18 year Escondido homeowner and resident

P-1 See response to comment B-1 regarding the historic value of the remaining adobe.

P-2 See response to comment B-1 regarding the project's conformance with the City's General Plan and South Centre City Specific Plan, and the additional residences at the project location.