

**Hickory Street Residential
Office to Multi-Family Residential Conversion**

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

General Plan Amendment Case No. PL23-0190, Zone Map Amendment Case No. PL24-0225, Master and Precise Development Permit Case Nos. PL23-0191/PL24-0215, and Design Review Permit Case No. PL24-0229



prepared for

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

prepared by

EPC Environmental Inc.
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September 9, 2024

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LIST OF ACRONYMS

<u>Acronym</u>	<u>Definition</u>
AB 32	Assembly Bill 32
AB 52	Assembly Bill 52
AMSL	Above Mean Sea Level
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
BMPs	Best Management Practices
CAA	Clean Air Act
CARB	California Air Resources Board
CALGreen	California Green Building Standards Code
CBC	California Building Codes
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CESA	California Endangered Species Act
CGP	Construction General Permit
CEQA	California Environmental Quality Act
City	City of Escondido
City-GP	General Plan, City of Escondido
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CONFIRE	Consolidated Fire Agencies
County	County of San Diego
dB	Decibel
dBA	A-Weighted Decibels
DTSC	Department of Toxic Substance Control
EIA	Energy Information Administration
ECC	Emergency Communications Center
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ERIS	Environmental Risk Information Service
ESA	Endangered Species Act
FAR	Federal Aviation Regulations
FAR	Floor Area Ratio
Farmland	Prime Farmland, Unique Farmland or Farmland of Statewide Importance
FEMA	Federal Emergency Management Agency
FGC	California Fish and Game Code
Form	Environmental Checklist Form
GCC	Global Climate Change
GHG	Greenhouse Gas
GWh	Gigawatt-Hours
HCP	Habitat Conservation Plan
HSC	Health and Safety Code
IL	Industrial Light
kBTU	Kilo British Thermal Units
kWh	Kilowatt-Hours

LED	Light Emitting Diode
LEQ	Equivalent Sound Level
LOS	Level of Service
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendent
MRZ	Mineral Resources Zone
MS4	Municipal Separate Storm Water Sewer System
MTCO _{2e}	Metric Tons Carbon Dioxide Equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NO _x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	Ozone
OPR	Office of Planning and Research
Pb	Lead
PM-2.5	Particulate Matter Less Than 2.5 Microns in Diameter
PM-10	Particulate Matter Less Than 10 Microns in Diameter
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB 100	Senate Bill 100
SDAPCD	San Diego Air Pollution Control District
SDAB	San Diego Air Basin
SDG&E	San Diego Gas and Electric
SF	Square Feet
SO ₂	Sulfur Dioxide
SP	Service Populations
SRA	Source Receptor Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIA	Traffic Impact Analysis
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plan
USDA	US Department of Agriculture
USFWS	US Fish & Wildlife Service
USGS	US Geological Survey
VOC	Volatile Organic Compounds

1 PURPOSE AND SCOPE

Escondido Investments, LLC (Applicant) proposes to convert an existing 19,431, three-story vacant office building into 21 residential units (Proposed Project) located at 240 South Hickory Street (Project Site). The one- and two-bedroom units would range from 419 square feet (SF) to 1,026 SF. The Proposed Project includes a density bonus request for one additional unit. The 0.69-acre Project Site, known as Assessor's Parcel Number (APN) 229-492-14-00, is currently zoned Hospital Professional.

The Proposed Project is a project under the California Environmental Quality Act (Public Resource Code §21000 et seq.: "CEQA"). The primary purpose of CEQA is to inform the public and decision-makers about the potential impacts of a project and to allow public input to ensure informed decision-making. CEQA requires all state and local government agencies to consider the environmental effects of projects over which they have discretionary authority. CEQA also requires each public agency to mitigate or avoid any significant environmental impacts resulting from the implementation of projects subject to CEQA.

According to Section 15367 of the State CEQA Guidelines, the City of Escondido (the City) is the lead agency for the Proposed Project. The lead agency is the public agency that has the principal responsibility for conducting or approving a project. The City, as the lead agency for the Proposed Project, is responsible for preparing environmental documentation following CEQA to determine if approval of the discretionary actions requested and subsequent development of the Proposed Project would significantly impact the environment.

1.1 CONTENT AND FORMAT OF THE INITIAL STUDY

The Initial Study is organized as follows:

- **Section 1 – Purpose and Scope.** This section introduces the scope of the Proposed Project and the City's role in the project, as well as a summary of findings.
- **Section 2 – Project Summary and Environmental Determination.** This section summarizes the Proposed Project and actions to be undertaken by the City. This section also provides the determination of the environmental document to be approved by the City.
- **Section 3 – Project Description.** This section details the Proposed Project components and general environmental setting.
- **Section 4 – Environmental Impacts.** This section contains the Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State CEQA Guidelines, as amended, and includes a series of questions about the project for each of the listed environmental topics. The Form evaluates whether or not there would be significant environmental effects associated with the development of the project and provides mitigation measures, when required, to reduce impacts to a less than significant level. The Form requires an analysis of 20 subject categories as well as Mandatory Findings of Significance.
- **Section 5 – List of Preparers.** This section identifies the names and affiliations of the individuals who contributed to the preparation of the environmental evaluation.
- **Section 6 – References.** This section identifies the references used in the preparation of this Initial Study.

1.2 INITIAL STUDY SUMMARY OF FINDINGS

Based on the analysis in Section 4, there were no environmental factors that could potentially affect (“Potentially Significant”) the environment. Mitigation measures were identified to reduce some impacts to Less Than Significant. Therefore, the determination, based on the Initial Study, is that a **Mitigated Negative Declaration** would be prepared.

1.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports and/or studies are applicable to the development of the Project Site and are hereby incorporated by reference:

- *General Plan, City of Escondido*. May 2012 (City-GP). Available at: <https://www.escondido.org/1106/Policy-and-Regulatory-Documents>

1.4 CONTACT PERSON

Any questions about the preparation of the Initial Study, its assumptions, or its conclusions should be referred to the following:

City of Escondido/Planning Division
Attn: Ivan Flores, AICP, Senior Planner
201 North Broadway
Escondido, California 92025
Phone: 760.839.4529
Email: ivan.flores@escondido.gov

2 PROJECT SUMMARY AND ENVIRONMENTAL DETERMINATION

2.1 PROJECT SUMMARY

1. **Project Title:** Hickory Street Office to Multi-Family Residential Conversion (Case Numbers PL23-0190, PL24-0225, PL23-0191, PL24-0215, PL24-0229)
2. **Lead Agency Name:** City of Escondido Planning Division
Address 201 North Broadway
Escondido, California 92025
3. **Contact Person:** Ivan Flores, AICP, Senior Planner
Phone: 760.839.4529
Email: ivan.flores@escondido.gov
4. **Project Location:** Northeast corner of South Hickory Street and East 3rd Avenue
Gross Acres: 0.69
Site Address: 240 South Hickory Street, Escondido, CA 92025
Assessor Parcel Number (APN) 229-492-14-00
5. **Applicant:** Escondido Investments, LLC
Address 1650 Hotel Circle North, Suite 110
San Diego, CA 92108
6. **General Plan Designation:** City of Escondido - Office (O)
7. **Zoning Designation:** City of Escondido - Hospital Professional (HP)
8. **Description of Project:**

Escondido Investments, LLC (Applicant) proposes to renovate an existing 19,431 square foot, three-story vacant office building into 21 residential units (Proposed Project), located at 240 South Hickory Street (Project Site). The one- and two-bedroom units would range from 419 square feet (SF) to 1,026 SF. Amenities include an on-site shared laundry room. The 0.69-acre Project Site, known as Assessor's Parcel Number (APN) 229-492-14-00 is currently zoned Hospital Professional. The concurrent entitlements include:

 - **General Plan Amendment (Planning Case No. PL23-0190)** to amend the General Plan land use designation from Office (O) to Urban V (U5) to accommodate a residential density of 30 units per acre;
 - **Zone Map Amendment (Planning Case No. PL24-0225)** to rezone the subject property from Hospital Professional (H-P) to Very High Multifamily Residential (R-5);
 - **Master and Precise Development Plan (Planning Case Nos. PL23-0191/PL24-0215)** to adopt a Planned Development Zone pursuant to Article 19 of the Escondido Zoning Code.

The Planned Development Zone would permit the conversion of the existing vacant office building into residential units at the permitted density under the proposed General Plan Amendment and Zone Map Amendment. The Project also includes a request for a density bonus agreement to exceed the maximum permitted density under the proposed General Plan Amendment for a total of 21 dwelling units (20 base units + 1 bonus unit), with 2 of the units being deed-restricted for low-income households. The project includes incentives/concessions and waivers for on-site and off-site improvements as permitted by the Escondido Zoning Code and State Density Bonus Law; and

- **Design Review Permit (Planning Case No. PL24-0229)** for the adoption of the Planned Development Zone as required by Article 64 (Design Review).

9. Surrounding Land Uses:

Surrounding land uses and major landmarks are identified in **Table 1 – Surrounding Land Use**. The Project Site is currently a vacant office building.

Table 1 Surrounding Land Use

Direction	Land Use Description	Zoning
SITE	Office Building (vacant)	Hospital Professional (HP)
North	Alleyway, small office buildings beyond the alley	Hospital Professional (HP)
East	Multi-family duplex	Light Multiple Residential (R-2-12)
South	E Third Avenue, Multi-family duplexes south of E 3 rd Avenue	Light Multiple Residential (R-2-12)
West	S Hickory Street, apartment complex south of S. Hickory Street	Roadway; Planned Development (PD-R-12)

10. Other Public Agencies Whose Approval is Required:

The following discretionary approvals are required for the Project:

Federal Agencies:

- There are no Federal agencies in which discretionary approvals are required.

State Agencies:

- There are no State agencies in which discretionary approvals are required.

Local Agencies:

- City of Escondido:
 - **General Plan Amendment Planning Case No. PL23-0190**
 - **Zone Map Amendment Planning Case No. PL24-0225**
 - **Master and Precise Development Plan Planning Case Nos. PL23-0191/PL24-0215**
 - **Design Review Permit Planning Case No. PL24-0229**
 - **Density Bonus Agreement**

11. California Native American Consultation:

Assembly Bill 52 (AB 52) established a formal consultation process for California tribes as part of the CEQA process. Senate Bill 18 (SB 18) requires local governments to consult with tribes before making certain planning decisions and requires consultation and notice for a General Plan and Specific Plan adoption or amendment to preserve or mitigate impacts to, cultural places that may be affected.

Pursuant to AB 52 and SB18, the City provided notification of the Proposed Project to the Native American Historical Commission (NAHC), and notification letters were sent to the Mesa Grande Band, of Mission Indians, Rincon Band of Luiseño Indians, San Pasqual Band, of Mission Indians, San Luis Rey Band, of Mission Indians, and Soboba Band of Luiseño on May 31, 2023. The San Pasqual requested formal consultation, and the City met with Angelina Gutierrez January 31, 2024, and September 5, 2024. The San Luis Rey Band requested formal consultation, and the City met with Carmen Mojado on August 03, 2023, and August 22, 2024. Both of these consultations closed on September 5, 2024. The Rincon Band of Luiseño Indians requested consultation and consultations between the City and Rincon Band were held on March 31, 2024, and concluded consultation on April 5, 2024.

The following summarizes the results of the consultation.

- San Pasqual Band – Did not express any concerns or recommend any mitigation measures due to project description (office conversion) very limited ground disturbance and developed nature of the site.
- San Luis Rey Band – Did not express any concerns or recommend any mitigation measures due to project description (office conversion) very limited ground disturbance and develop nature of the site.
- Rincon Band- stated a previously recorded significant habitation site is within 0.25 miles of the project property and additional Luiseño placenames are in proximity. Tribal monitoring will be required for the ground-disturbing activities. Requested Rincon Band be notified of any changes in project plans.

Mitigation Measures TCR-1 through TCR-10 are required to ensure resources to tribal cultural resources would be mitigated to a less than significant level.

2.2 ENVIRONMENTAL ANALYSIS AND DETERMINATION

Per the CEQA (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the Proposed Project to determine any potentially significant impacts on the environment that would result from the construction and implementation of the Project. This Initial Study is based on an Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State CEQA Guidelines, as amended, and includes a series of questions about the project for each of the listed environmental topics. The Form evaluates whether or not there would be significant environmental effects associated with the development of the project and provides mitigation measures, when required, to reduce impacts to a less than significant level.

Per California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency in consultation with other jurisdictional agencies, to determine whether a Negative

Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the Proposed Project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the Proposed Project.

2.2.1 Evaluation of Environmental Impacts

A brief explanation 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. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to the project (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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the Lead Agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant.

“Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

“Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less Than Significant Impact.” Mitigation measures are identified and explain how they reduce the effect to a less than significant level (mitigation measures may be cross-referenced).

Earlier analyses may be used where, pursuant to the 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 analyses used where they are available for review.
- b) Which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and whether such effects were addressed by mitigation measures based on the earlier analysis.
- c) The mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project for effects that are “Less than Significant with Mitigation Measures Incorporated”.

References and citations have been incorporated into the checklist references to identify information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared

or outside document, where appropriate, include a reference to the page or pages where the statement is substantiated.

Source listings and other sources used, or individuals contacted are cited in the discussion.

The explanation of each issue identifies:

- a) The significance criteria or threshold, if any, used to evaluate each question.
- b) The mitigation measure identified, if any, to reduce the impact to less than significant.

2.2.2 Environmental Factors Potentially Affected

Based on the analysis in Section 4, the environmental factors below would be potentially affected by the Proposed Project. The factors checked below were found to either be “Potentially Significant” or where mitigation measures were identified to reduce potential impacts to less than significant.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

2.2.3 Determination

On the basis of this initial evaluation, the following finding is made:

	The Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	Although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	The Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	The Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	Although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Wan Flores
Signature

9/16/24
Date

Wan Flores
Name

9/16/24
Title

3 PROJECT DESCRIPTION

Escondido Investments, LLC (Applicant) proposes to renovate an existing 19,431 square foot, three-story vacant office building into 21 residential units (Proposed Project), located at 240 South Hickory Street, (Project Site). The one- and two-bedroom units would range from 419 square feet (SF) to 1,026 SF. Amenities include a 3,800 SF common area and on-site shared laundry. The 0.69-acre Project Site, known as Assessor's Parcel Number (APN) 229-492-14-00 is currently zoned Hospital Professional. The concurrent entitlements include:

- General Plan Amendment (Planning Case no. PL23-0190) to amend the General Plan designation from Office (O) to Urban V (U5) to accommodate a residential density of 30 units per acre;
- Zone Map Amendment (Planning Case No. PL24-0225) to rezone the subject property from Hospital Professional (H-P) to Very High Multifamily Residential (R-5);
- Master and Precise Development Plan (Planning Case No. PL23-0191/PL24-0215) to adopt a Planned Development Zone pursuant to Article 19 of the Escondido Zoning Code. The Planned Development Zone would permit the conversion of the existing vacant office building into residential units at the permitted density under the proposed General Plan Amendment and Zone Map Amendment. The Project also includes a request for a density bonus agreement to exceed the maximum permitted density under the proposed General Plan Amendment for a total of 21 dwelling units (20 base units + 1 bonus unit), with 2 of the units being deed-restricted for low-income households. The project includes incentives/concessions, and waivers for on-site and off-site improvements as permitted by the Escondido Zoning Code and State Density Bonus Law; and,
- Design Review Permit (Planning Case No. PL24-0229) for the adoption of the Planned Development Zone as required by Article 64 (Design Review).

3.1 PROJECT SITE SETTING

The Project Site is located on a 0.69-acre developed lot on the northeast corner of South Hickory Street and East 3rd Avenue in the City of Escondido within APN 229-492-14-00 (**Figure 1 – Regional Vicinity** and **Figure 2 – Site Location: Aerial**). The Project Site is relatively flat with a gentle slope, with its elevation ranging from approximately 745 feet above mean sea level (amsl) in the northeast corner, to approximately 760 feet amsl at the southwest corner.

The Project Site contains one, three-story structure historically used for medical offices. The existing building contains a total of approximately 19,431 square feet (sf) of gross building area. The site is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west.

Site Zoning

The City of Escondido designates zoning for APN 229-492-14-00 as Hospital Professional (**Figure 3 – Site Zoning**) The HP zoning allows medical offices and health care services, short-term convalescent and long-term care facilities, research labs, medical supply, and similar uses.

3.2 PROJECT CHARACTERISTICS - CONSTRUCTION

The Project components include the following:

Site Plan: The Proposed Project improvements primarily occur in the interior of the existing building to reconfigure the 400 SF to 900 SF medical suites to one- and two-bedroom units would range from 419 square feet (sq. ft.) to 1,026 sq. ft., shared laundry facilities, and building access (**Figure 4 – Site Plan Schematic**). According to historical aerial images, the building appears to have been built sometime in the 1970s, showing up in images by 1978.

Interior improvements primarily include:

- New paint and flooring
- Drywall, stucco, and roof repairs
- Installation of kitchens in all units, with space for a refrigerator, a sink, cooking facilities, a food preparation counter, and storage cabinets
- Installation of bathrooms in all units
- Installation of shared laundry facility
- Pest control treatments

Exterior improvements generally include:

- Signage Rebranding
- Parking lot repairs, including repaving, restriping, and/or space labeling
- Retrofitted dumpster area, as needed
- Renovated landscaping

Fenestration and Glazing: The existing commercial windows will be replaced with newer residential windows.

Site Lighting: Site lighting would remain the same.

Both interior and exterior improvements are required to comply with the most recent version of the California Code of Regulations Title 24 energy efficiency standards and sustainable design features required by CalGreen and will be documented as part of the City's building permit process.

The elevation of the existing three-story building is approximately 41 feet high, and no height alterations are proposed. Refer to **Appendix A – Architectural Plans** for a complete plan set that identifies the site and unit layouts.

Off-Site Improvements: There are no road improvements or other off-site improvements required for the Proposed Project.

Site Access: Primary access would remain as Hickory Street.

Parking: The Project Site has 59 existing parking stalls. According to the Escondido Municipal Code (EMC) Article 39 Off-Street Parking, 1.5 spaces are required for 1-bedroom units, while 1.75 spaces are required for 2-bedroom units. In addition, 1 parking space per 4 units is required for guest parking. Therefore, the proposed 21-unit residential project would require 40 parking spaces. The Proposed Project would provide 53 parking spaces. The parking spaces would be assigned to the units.

Landscaping and Hardscape: The site has perimeter landscaping along the eastern, southern, and western property boundaries, and includes parking lot trees near the alley. Landscaping consists of ornamental planting, such as grass, palm trees, and decorative shrubs. The existing landscaping will be refreshed with native and ornamental trees and shrubs.

Stormwater Management: The stormwater controls for the existing site would remain. No new stormwater controls are planned or required because the Project is not increasing the amount of impervious surfaces.

Utilities and Services: Public water and sewer is served by the City of Escondido (City), and electrical and gas service is readily available through San Diego Gas and Electric (SDG&E).

3.2.1 Construction Timing

The Construction start date is expected to commence in the 1st quarter of 2025 and will occur in one phase lasting approximately 12 months.

3.3 PROJECT CHARACTERISTICS - OPERATIONS

The Proposed Project would operate as a market-rate rental property offering a lower cost and stable long-term living situation. The Proposed Project is intended to provide for a greater variety of housing types for the community.

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Figure 1 – Regional Vicinity

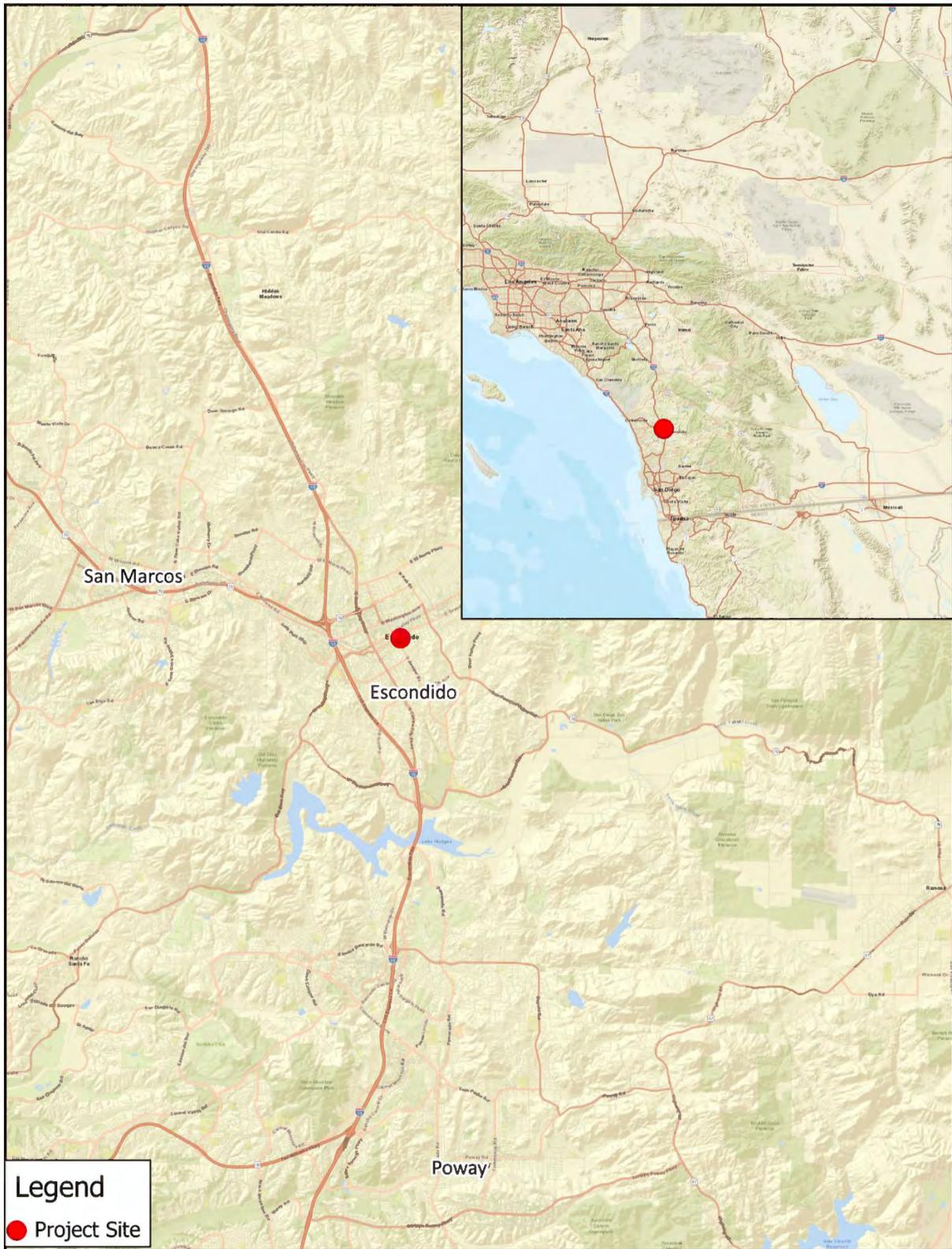


Figure 1- Regional Vicinity Map

Source: Google Maps

Figure 2 – Site Location: Aerial

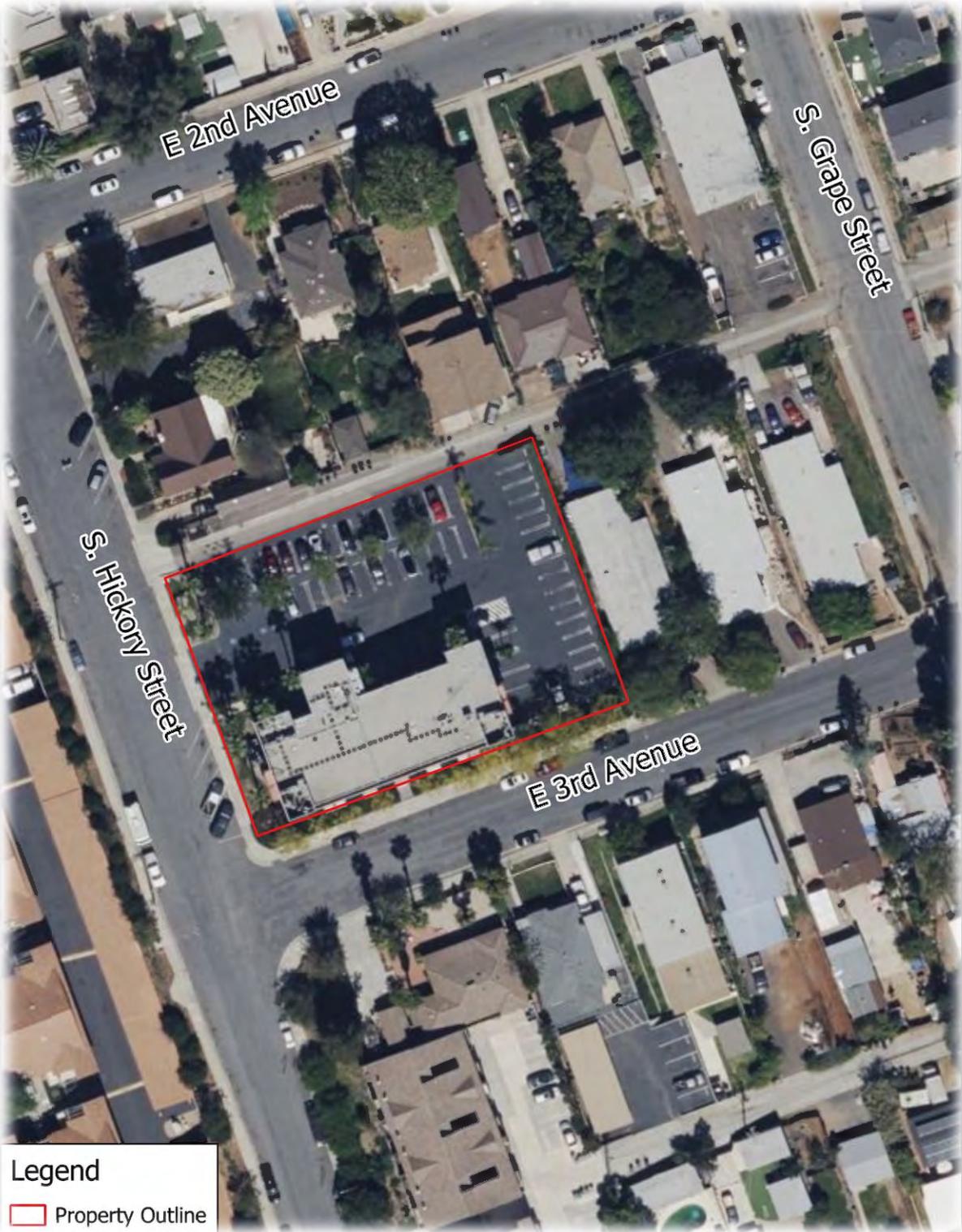
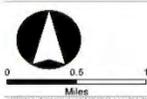
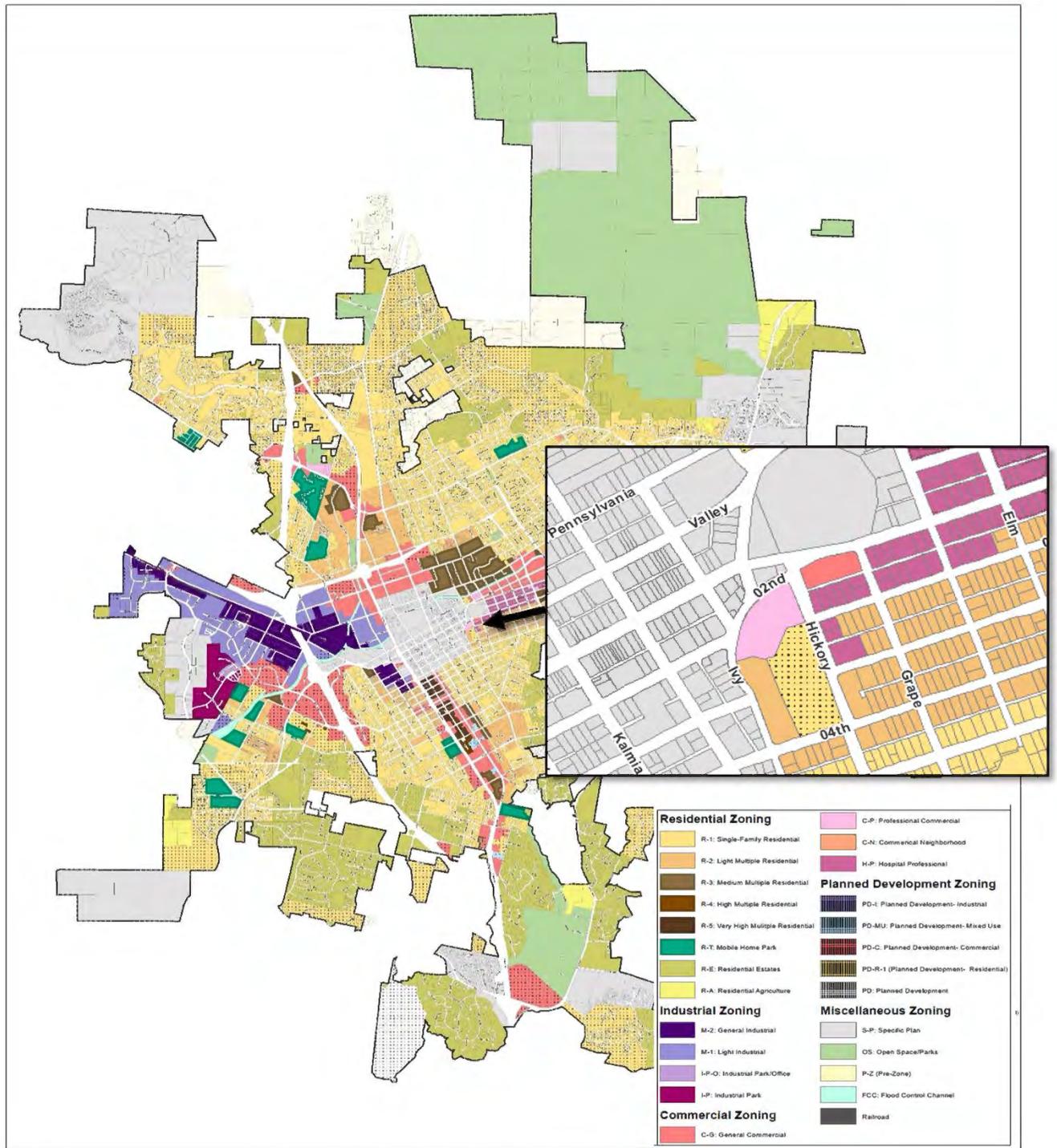


Figure 2- Site Location: Aerial

Source: Bing Satellite

Figure 3 – Site Zoning



City of Escondido Zoning Map



Figure 3- Site Zoning

Source: City of Escondido

4 ENVIRONMENTAL IMPACTS

4.1 AESTHETICS

4.1.1 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
I. AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

Discussion

a) *Have a substantial adverse effect on a scenic vista?*

No Impact. The City of Escondido General Plan Resource Conservation Element, Figure VII-5 identifies the community’s steep slopes, primary and secondary ridgelines, and prominent natural landforms as scenic vistas.¹ The General Plan states:

“Visual Resources Policy 3.2 Require new development to avoid obstructing views of, and to minimize impacts to, significant visual resources through the following: creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks.”²

¹ Escondido General Plan Resource Conservation, Figure VII-5, Slopes and Ridgelines. Available at: <https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF> Accessed June 17, 2024.

² Ibid. Page VII-23.

The Project Site is located in the central portion of the City which is developed by urban uses. The prominent natural landforms, steeply sloped area, and ridgelines that are considered scenic vistas by General Plan: Figure VII-5, are located approximately three to four miles from the Project Site.

Given its location and building height of 41 feet, the Project would not block views of these scenic resources from any public vantage points (Hickory Steet and E. 3rd Avenue).³ Therefore, no impacts would occur, and no mitigation would be required.

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

No Impact. The Project Site is not within a state scenic highway. Therefore, no impacts associated with scenic resources within a state scenic highway would occur, and no mitigation would be required.

- c) *In nonurbanized 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 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 Project Site is located within an urbanized area that is zoned Hospital Professional. The Proposed Project includes a zone change to Very High Multifamily Residential (R-5) and adoption of a Planned Development (PD) zone to facilitate the conversion. Project approval would result in the Proposed Project's consistency with applicable zoning regulations, and would not exceed the height as permitted by the Escondido Zoning Code for residential uses.

There are no mitigation measures for aesthetics included in the City's General Plan relative to residential development. Therefore, potential impacts associated with scenic quality would be less than significant, and no mitigation would be required.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

No Impact. The Proposed Project would not change the existing lighting of the building or parking lot. Therefore, the Proposed Project will not create a new source of light. Concerning glare, the Project proposes to replace the existing office windows with residential, non-glare, high-energy efficiency windows in the same window locations, and no new window locations are proposed. Therefore, the Proposed Project will not create a new source of glare.

Therefore, no impacts would occur, and no mitigation would be required.

³ Google Earth Pro. 240 S. Hickory Street, Escondido, California. Available at: <https://www.google.com/earth/about/versions/>. Accessed February 18, 2024.

4.1.2 Mitigation Measures

No mitigation measures associated with impacts to Aesthetics apply to the Proposed Project.

4.1.3 Conclusion

There would be no potential impacts of the Proposed Project associated with Aesthetics, and no mitigation would be required.

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4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts on 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB). 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?				X
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Discussion

- 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 nonagricultural use?*

No Impact. According to the California Department of Conservation Farmland Mapping and Monitoring Program, the Project site is identified as Urban Built-Up Land. Therefore, there would be no potential impacts associated with the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide

Importance (Farmland), as shown on the maps prepared according to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use, and no mitigation would be required.

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

No Impact. No part of the Project site or its surroundings are designated for agricultural use nor is it subject to any Williamson Act contracts. No impacts would occur, and no mitigation would be required.

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. No part of the Project site or its surroundings is designated as timberland. No impacts would occur, and no mitigation is required.

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

No Impact. There is no designated forest land on the Project site, and the Proposed Project would therefore not affect forests during construction or operations. No impacts would occur, and no mitigation would be required.

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

No Impact. The Proposed Project includes the conversion of an existing office building in an urban area to residential use. As discussed under Thresholds II.2 (b) through II.2(d), the Proposed Project would not involve other changes in the existing environment that would result in conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest land. Therefore, there would not be potentially significant impacts associated with changes in the environment which could result in conversion of farmland to non-agricultural use, and no mitigation would be required.

4.2.2 Mitigation Measures

No mitigation measures associated with impacts to Agriculture and Forestry Resources apply to the Proposed Project.

4.2.3 Conclusion

No potentially significant impacts of the Proposed Project are associated with Agriculture and Forestry Services, and no mitigation would be required.

4.3 AIR QUALITY

This air quality analysis was prepared to evaluate whether the estimated criteria pollutants generated from the Project would cause a significant impact on the air resources in the Project area (**Appendix B – EPC 23-29 Hickory Street Residential Project – Air Quality and GHG Technical Memorandum, KPC EHS Consultants, LLC, October 26, 2023, revised June 12, 2024**).

4.3.1 Regulatory Setting

Air pollutants are regulated at the national, state, and air basin levels; each agency has a different level of regulatory responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level under the Clean Air Act (CAA) of 1970. The California Air Resources Board (CARB) regulates at the state level. The State is currently divided into 15 air basins, and each air basin is regulated on a regional level.

There are six common air pollutants, called criteria pollutants, which were identified from the provisions of the CAA of 1970.

- Ozone (O₃)
- Nitrogen Dioxide (NO₂)
- Lead
- Particulate Matter (PM₁₀ and PM_{2.5})
- Carbon Monoxide (CO)
- Sulfur Dioxide (SO₂)

The EPA and the CARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

The Project site is in the City of Escondido which lies within the San Diego Air Basin (SDAB) and is regulated by the San Diego Air Pollution Control District (SDAPCD). San Diego County is presently designated a basic non-attainment area for the National Ambient Air Quality Standards (NAAQS) for O₃. The County is also a non-attainment area for the California standards for ozone and PM₁₀. As such the highest concern involving criteria pollutants is whether a project would result in a cumulatively considerable net increase of PM₁₀, PM_{2.5}, or exceed screening level criteria thresholds for O₃ precursors [oxides of nitrogen (NO_x) and volatile organic compounds (VOCs)].

Thresholds of Significance

The City of Escondido relies on the SDAPCD and Section 33-924(a)(5) of the Escondido Municipal Code for establishing significance thresholds for criteria air pollutants. The SDAPCD and Municipal Code establish the same significance thresholds. In accordance with SDAPCD Rules 20.2 and 20.3, the SDAPCD has established Screening Level Thresholds (SLTs) for six air pollutants. SDAPCD does not currently have SLTs for volatile organic compounds (VOCs) or particulate matter (PM_{2.5}). SDAPCD recommends including screening levels specified by the South Coast Air Quality Management District (SQAQMD) for those two

criteria pollutants. Furthermore, SDAPCD does not have separate screening thresholds for construction activities and recommends using the daily stationary SLTs for comparative purposes for construction emissions. Table 2, below, summarizes the SLTs used for this analysis.

Table 2
San Diego Air Pollution Control District Significance Thresholds

Pollutant	Emissions (Construction & Operational) (pounds/day)	Emissions (Construction & Operational) (tons/year)
NOx	250	40
VOC (ROG)	75	13.7
PM10	100	15
PM2.5	55	10
SOx	250	40
CO	550	100

Source: County of San Diego Guidelines for Determining Significance – Air Quality (Department of Planning and Land Use, Department of Public Works, 2007)

4.3.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY:				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?			X	

Discussion

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

Less Than Significant Impact. The Proposed Project would not conflict with or obstruct the implementation of the SCAQMD AQMP.

SDAPC Air Quality Management Plan

The CEQA Guidelines require a discussion of any inconsistencies between a Proposed Project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the Proposed Project includes the San Diego Regional Air Quality Strategy (RAQS), last updated in 2022 (SDAPCD 2022). This plan outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. The Project is located within the SDAB and under the jurisdiction of the SDAPCD. Under the Federal Clean Air Act, the SDAPCD has adopted a variety of attainment plans [i.e., "Region Air Quality Strategy (RAQS)" and State Improvement Plans (SIPs)] for a variety of non-attainment pollutants.

The SDAPCD is responsible for maintaining and ensuring compliance with the RAQs. Conformity for the Project was determined based on the following criteria:

- (1) A project is non-conforming if it conflicts with or delays the implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).
- (2) A project is conforming if it complies with all applicable SDAPCD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Criterion 1 – Increase In Dwelling Units, Trips, or Vehicle Miles Traveled

The Project Site's General Plan land use designation is Office (O), with a zoning of Hospital Professional (H-P). The proposed Project includes a request for a General Plan Amendment to amend the land use designation from Office (O) to Urban V (U5) and Zone Map Amendment to rezone the subject property to R-5, and adoption of a PD Zone for the conversion to residential uses. Therefore, the current proposed residential land use designation and zoning were not used by the SDAPCD and SANDAG to generate the growth forecasts and would be slightly greater than the growth assumptions used in the RAQs and SIPs.

Based on the California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2023*, the City's population as of January 1, 2023, is 149,799 with a ratio of persons per household of 3.01 (Appendix B). Based on the number of dwelling units times 3.01 persons per dwelling unit, the proposed Project would increase the City's population by approximately 63 persons assuming all residents came from outside the City. (3.01 persons/du with 20 units). An increase of 63 to the current population of 149,799 represents an increase of 0.04 % and would not induce substantial population growth.

Additionally, SANDAG's forecasted population estimates for the City show the population in 2025 with a growth to 163,593 in the buildout year of the proposed Project which is an increase of approximately 13,794 over the current population. The addition of approximately 63 new residents as a result of the proposed Project would be accommodated by the projected growth used to prepare the 2022 RAQS. Because the growth forecasts and development assumptions upon which the SIP and RAQS are based would not be exceeded and therefore would not result in greater emissions than anticipated in the State Implementation Plan (SIP) and RAQS, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plans. The impact would be less than significant, and no mitigation would be required.

Criterion 2 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in Appendix B, neither short-term construction impacts nor long-term operations would result in significant impacts based on the SDAPC regional and local thresholds of significance.

Therefore, potential impacts associated with an inconsistency with the SDAPC RAQS would be less than significant, and no mitigation would be required.

- 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 Project Site is in the SDAB, which is presently designated a basic non-attainment area for the NAAQS for O₃. The City is also in a non-attainment area for the CAAQS for ozone and PM₁₀. As such the highest concern involving criteria pollutants is whether a project would result in a cumulatively considerable net increase of PM₁₀, PM_{2.5}, or exceed screening level criteria thresholds for O₃ precursors [oxides of nitrogen (NO_x) and volatile organic compounds (VOCs)]. San Diego County is presently designated a basic non-attainment area for the NAAQS for O₃. The County is also a non-attainment area for the California standards for ozone and PM₁₀.

Based on the analysis provided in Appendix B, the Proposed Project would result in short-term emissions from construction associated with site grading/preparation, utility installation, construction of buildings, and paving, but no activity exceeded the SDAPC thresholds of significance. The Proposed Project would also generate operational emissions associated with new vehicle traffic and energy use.

Construction Impacts

Construction activities associated with the Proposed Project would result in emissions of CO, NO_x, VOCs SO₂, PM₁₀, and PM_{2.5}; however, none are above the SDAPCD Threshold Levels of Significance, as shown in **Table 3: Construction Emissions pounds/day** and Appendix B.

The Proposed Project is required to comply with all SDAPCD rules and regulations including but not limited to dust control, idling engines, and architectural coatings.

Therefore, potential impacts associated with construction emissions would be less than significant, and no mitigation would be required.

Table 3
Construction Emissions pounds/day

Year/Season	Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Construction 2024 (Winter)	22.5	5.72	7.72	0.01	0.39	0.27
Construction 2024 (Summer)	0.62	5.73	7.64	0.01	0.81	0.29
Maximum Daily Emissions	22.5	5.73	7.72	0.01	0.81	0.29
SDAPCD Screening Threshold	75	250	550	250	100	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: CalEEMod 2022.1.1.20 Datasheets. (Appendix A).

Operational Impacts

Operations emissions include stationary (residence emissions), mobile (transportation emissions), and area (on-going architectural coatings, consumer product use, landscaping maintenance emissions), default values were used. SDAPCD screening thresholds were used to determine the project’s impacts. The operations-related criteria air quality impacts created by the proposed Project were analyzed using the CalEEMod model (Appendix A). The summer and winter emissions created by the proposed Project’s long-term operations were calculated and the highest emissions from either summer or winter are provided in Appendix A. As demonstrated in **Table 4 - Peak Operational Emissions**, none of the criteria pollutants are anticipated to be generated above the SCAQMD Threshold Levels of Significance.

**Table 4
 Peak Operational Emissions**

Source	Emissions (lbs/day)					
	VOC/ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Emissions						
Area Source	10.9	0.75	19.8	0.05	2.50	2.45
Energy Source	0.04	0.31	0.13	<0.005	0.03	0.03
Mobile Source	1.39	1.19	10.7	0.03	2.16	0.56
Total Maximum Daily Emissions	12.3	2.25	30.6	0.08	4.69	3.04
SDAPCD Screening Threshold	75	250	550	250	100	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter Emissions						
Area Source	10.7	0.73	17.8	0.05	2.50	2.45
Energy Source	0.02	0.31	0.13	<0.005	0.03	0.03
Mobile Source	1.29	1.27	9.11	0.02	2.16	0.56
Total Maximum Daily Emissions	12.0	2.31	27.0	0.07	4.69	3.04
SDAPCD Screening Threshold	75	250	550	250	100	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

As a result, the project would result in a less than significant cumulative impact on operational emissions.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution than others due to their exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, a sensitive receptor would be a location where a sensitive individual could remain for 24 hours or longer, such as residencies, hospitals, and schools (etc.).

The closest existing sensitive receptors (to the site area) are identified in **Table 5: Sensitive Receptor Locations**.

Table 5
Sensitive Receptor Locations

Receptor	Distance from Project Site Boundary (feet)	Distance from Project Construction Center (feet)
Multi-Family Residential (west)	120	240
Multi-Family Residential (adjacent property boundary east)	10	95
Residential (north)	30	120
Residential (south)	75	170

Source: Google Earth Pro, October 23, 2023

The properties adjacent to the eastern Project site boundary on the east are multi-family residential, to the north an alley way followed by single-family residential, to the west South Hickory Street followed by multi-family residential, and to the south, the site is bounded by East 3rd Avenue followed by single family residential. The Project would be compatible with surrounding land uses and would not adversely impact sensitive receptors during operations.

Whenever a project would require the use of chemical compounds that have been identified as Toxic Air Contaminates (TACs) by the SDAPCD; placed on CARB's air toxics list according to Assembly Bill 1807 (AB 1807), Air Contaminant Identification and Control Act (1983); or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment (HRA) is required by the SCAQMD. Residential, commercial, and office uses do not use substantial quantities of TACs.

Guidance for conducting a Health risk Assessment (HRA), typically includes the following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet; and,
- A gasoline dispensing facility within 300 feet.

The Project is a residential development and does not produce toxic air emissions such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions.

CO Hotspot Analysis

The SDAB is designated attainment under the CAAQS and NAAQS for CO. An adverse CO hotspot would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. Due to changing regulations vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, the introduction of cleaner fuels, and the implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin has steadily declined.

Given the extremely low level of CO concentrations in the project area and no project-traffic-related impacts at any intersections, Project-related vehicle emissions are not expected to result in the CO concentrations exceeding the State or federal CO standards.

Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. The impacts are less than significant, and no mitigation would be required.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement and architectural coatings. The objectionable odors that may be produced during the construction process are short-term and the odor emissions are expected to cease upon the drying or hardening of the materials.

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not propose any of the above-described uses.

Potential sources that may emit odors during the on-going operations of the Proposed Project would include odor emissions from trash storage areas. It is expected that Project-generated refuse will be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Additionally, the Project is required to comply with the provisions of SDAPCD Rule 51, "Nuisance" which was established to reduce odorous emissions into the atmosphere.

Due to the distance of the nearest receptors from the Project site and through compliance with SDAPC regulations, no significant impact related to odors would occur during the on-going operations of the Proposed Project. The impacts would be less than significant, and no mitigation would be required.

4.3.3 Mitigation Measures

No mitigation measures associated with impacts to Air Quality apply to the Proposed Project.

4.3.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Air Quality, and no mitigation would be required.

4.4 BIOLOGICAL RESOURCES

4.4.1 Regulatory Setting

Given the local environment, regulations governing biological resources for this Project include the following:

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C 703-711) protects nesting birds that are both residents and migrants whether they are considered sensitive by resource agencies. The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injury or death of a migratory bird, due to construction activities or other construction-related disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered a take under federal law. The US Fish & Wildlife (USFWS), in coordination with the California Department of Fish and Wildlife (CDFW), administers the MBTA. CDFW's authoritative nexus to MBTA is provided in California Fish and Game Code (FGC) Sections 3503.5 which protects all birds of prey and their nests and FGC Section 3800 which protects all non-game birds that occur naturally in the State.

Endangered Species Act - Federal

The purpose of the United States Endangered Species Act (ESA) which was established in 1973 provide protection for fish, wildlife, and plants that are listed as threatened or endangered; provides for adding species to and removing them from the list of threatened and endangered species, and for preparing and implementing plans for their recovery; provides for interagency cooperation to avoid take of listed species and for issuing permits for otherwise prohibited activities; provides for cooperation with States, including authorization of financial assistance; and implements the provisions of the Convention on International Trade in Endangered Species of Wild Flora and Fauna. The USFWS administers the federal ESA.

California Endangered Species Act

The California Endangered Species Act (CESA) is a California environmental law that conserves and protects plant and animal species at risk of extinction. Originally enacted in 1970, CESA was repealed and replaced by an updated version in 1984 and amended in 1997. Plant and animal species may be designated threatened or endangered under CESA after a formal listing process by the California Fish and Game Commission. Approximately 250 species are currently listed under CESA. A CESA-listed species, or any part or product of the plant or animal, may not be imported into the state, exported out of the state, "taken" (i.e., killed), possessed, purchased, or sold without proper authorization. Implementation of CESA has reduced and avoided impacts on California's most imperiled plants and animals, has protected hundreds of thousands of acres of vital habitat, and has led to a greater scientific understanding of California's incredible biodiversity.

The CDFW works with agencies, organizations, and other interested persons to study, protect, and preserve CESA-listed species and their habitats. CDFW also conducts scientific reviews of species petitioned for listing under CESA, administers regulatory permitting programs to authorize take of listed

species, maintains an extensive database of listed species occurrences, and conducts periodic reviews of listed species to determine if the conditions that led to original listing are still present.

Multiple Species Conservation Program (MHCP)

The MHCP, adopted by the San Diego Association of Governments (SANDAG) in March 2003, is a comprehensive, multiple-jurisdiction planning program designed to create, manage, and monitor an ecosystem preserve in northwestern San Diego County. The MHCP subregion encompasses the seven incorporated cities of northwestern San Diego County (Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista). These jurisdictions are required to implement their portions of the MHCP through citywide subarea plans, which describe the specific policies each city will institute for the MHCP.

City of Escondido Municipal Code – Vegetation and Tree Removal

The City establishes regulations and standards for the preservation, protection, and selected removal of vegetation, including mature and protected trees. A City-issued vegetation removal permit or a grading permit is required before clearing, pruning, or destroying vegetation and before any encroachments by construction activities that disturb the root system within the dripline (e.g., the outer extent margin of a tree's canopy) of any mature and protected trees. Issuance of a vegetation removal permit requires the submittal of a tree survey and, as applicable, a tree protection and/or replacement mitigation plan. Issuance of a grading plan would also require the location and identification of any existing sensitive biological habitat, mature trees, and protected trees. The grading permit would state any required mitigation for the loss of these resources. Tree protection, removal, and replacement standards are outlined in the City's General Plan and Chapter 33 (Zoning), Article 55 (Grading and Erosion Control) of the City's Municipal Code (Ordinance 2001-21). The City's General Plan recognizes any oak tree species and other mature trees, as defined below, as significant aesthetic and ecological resources deserving protection within the boundaries of the City. Sections 33-1052 and 33-1068 of the City's Municipal Code set forth rules and standards related to mature tree removal, protection, and replacement.

Section 33-1502 (Definitions): A mature tree is any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree (genus *Quercus*), shall have a diameter of four inches or greater when measured at 4.5 feet in diameter at breast height (DBH) above the tree's natural grade. All other mature trees shall have a DBH of eight inches, or greater, for a single stem or one of the multiple stems.

A protected tree is any oak that has a 10-inch or greater DBH, or any other tree species or individual specimen listed on the historic register or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, according to Article 40 of the Escondido Zoning Code.

4.4.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?				X
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?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?			X	

Discussion

- a) *Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

No Impact. The Project Site is located in an urban area surrounded by urban uses. There is no habitat for sensitive species on the Project Site or in the Project Site vicinity.

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

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. The Project Site is located in an urban area, and there are no rivers or streams adjacent to, or in the vicinity of, the Project Site. There would be no impact, and no mitigation would be required.

- c) *Have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The Project Site is an existing office building within an urban area and does not contain any federally protected wetlands. There are no impacts, and no mitigation would be required.

- 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?*

Less Than Significant Impact With Mitigation Incorporated. A wildlife corridor is typically defined as a linear landscape element that serves as a linkage between historically connected habitats/natural areas and is meant to facilitate movement between these natural areas.

The Project Site is located within an urban area, with no linkage between habitat areas.

However, the vegetation on site and adjacent trees may attract birds that are protected by the MBTA. There are mature ornamental trees on site and in the Project Site vicinity that could provide adequate nesting habitat for birds that may be impacted by Project development. Landscaping activities may include removal and replacement of trees on site and/or tree trimming. As such, implementation of **Mitigation Measure BIO-1** to perform a pre-construction nesting bird survey to reduce potential impacts to nesting birds protected by the MBTA is required to reduce the Project's potential impacts.

With the implementation of Mitigation Measure, BIO-1 would reduce impacts to less than significant.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less Than Significant. The Project would not conflict with any local policies or ordinances protecting biological resources as no biological resources or tree ordinances apply to the Project Site.

Tree Removal/Vegetation Clearing

The Proposed Project would not modify the existing landscaping. The mature palm trees on the site do not qualify as a protected oak tree that has a 10-inch or greater Diameter at Breast Height (DBH); however, the Project does have existing mature trees subject to Article 55 (Grading and Erosion Control) of the Escondido Zoning Code as detailed as summarized in Table 6 below

**Table 6
 Inventory of Protected and Mature Trees**

Tree Type	Existing Number of Trees	DBH	Number of Trees to be Removed	Total Avoided
Protected		4 inches to 9.99 inches	0	0
Mature Trees	13	8 inches or greater	0	13

As shown in Table 6 above, the Project would not remove any protected or mature trees. Thus, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There are no impacts, and no mitigation would be required.

- 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. The Project Pite is not located within a Pre-Approved Mitigation Area (PAMA) targeted for conservation by the MHCP. Within the Draft Escondido SAP, the project site is not mapped as a Focused Planning Area (FPA), not designated as Constrained Lands outside the FPA, and not located within the biological core and linkage area (BCLA).

Therefore, the Proposed Project does not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The impacts are less than significant, and no mitigation would be required.

4.4.3 Mitigation Measures

MM BIO-1: Bird nesting season generally extends from February 1 through September 15 in southern California and specifically, April 15 through August 31 for migratory passerine birds. To avoid impacts on nesting birds (common and special status) during the nesting season, the Applicant shall retain a qualified Avian Biologist will conduct pre-construction Nesting Bird Surveys before project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action will be required. If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity, and duration of disturbance. The nests and buffer

zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

4.4.4 Conclusion

Implementation of **Mitigation Measures BIO-1** would reduce potentially significant impacts of the Proposed Project associated with Biological Resources to less than significant.

4.5 CULTURAL RESOURCES

4.5.1 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?				X
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

Discussion

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

No Impact. Public Resources Code Section 15064.5(a) defines historical resources, which include: *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 14 CCR, Section 4850 et seq.).*

Generally, resources under 50 -years of age do not need to be evaluated unless they contain sufficient integrity for listing on the California Register. ⁴ The 50-year threshold originally comes

⁴ <https://www.ecfr.gov/current/title-36/chapter-I/part-60/section-60.4>

from 36 Code of Federal Regulations 60.4, which pertains to the National Register.⁵ Those regulations require a resource to be “exceptionally important” to be considered eligible for listing. On the other hand, the California Register criteria (CCR § 4852) state that for a resource to achieve significance within the past 50 years, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. All buildings constructed over 50 years ago and possess architectural or historical significance may be considered potential historic resources and proposed changes to these buildings may require some level of environmental review.

Additionally, the California Office of Historic Preservation maintains a Built Environment Resources Directory (BERD) that provides information, organized by county, regarding non-archaeological resources in the Office of Historic Preservation’s (OHP) inventory.⁶ The OHP inventory contains information only for cultural resources that have been processed through the office. This includes resources reviewed for eligibility to the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs.

The Project Site is not identified as a historical resource on the BERD directory. The Project Site consists of a modern office building constructed around 1978 according to Google Earth, which makes the building 46 years old. Thus, the building does not meet the primary criterion of being older than 50 years. The City has not identified the building as being of “exceptional importance,” thus making it eligible for listing on the California Register. Therefore, there would be no impact associated with an adverse change to a historical resource, and no mitigation would be required.

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

No Impact. Archaeological sites represent the material remains of human occupation and activity either before European settlement (prehistoric sites) or after the arrival of Europeans (historical sites).

The Proposed Project is to convert an existing office building into a residential use. No excavation is proposed that would expose buried archaeological resources or remains of human occupation. Therefore, there would be no impact on an archaeological resource according to Section 15064, and no mitigation would be required.

- c) *Disturb any human remains, including those interred outside of formal cemeteries?*

No Impact. The Proposed Project is to convert an existing office building into a residential use. No excavation is proposed that would expose human remains. In addition, California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations

⁵ California Register of Historic Resources. https://ohp.parks.ca.gov/?page_id=21238

⁶ https://ohp.parks.ca.gov/?page_id=30710.

concerning the treatment and disposition of the human remains to the person responsible for the excavation, or his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law would ensure that significant impacts to human remains would not occur.

4.5.2 Mitigation Measures

No mitigation measures associated with impacts to Cultural Resources apply to the Proposed Project.

4.5.3 Conclusion

There are no potential impacts of the Proposed Project associated with Cultural Resources, and no mitigation would be required.

4.6 ENERGY

This section describes the potential energy usage effects from implementation of the Proposed Project for both construction activities as well as long-term operations, and is based on information provided in **Appendix C – EPC 23-29 Hickory Street – Escondido Residential Project – Energy Technical Memorandum, KPC EHS Consultants, LLC, November 16, 2023, revised June 12, 2024.**

4.6.1 Regulatory Setting

Building Energy Efficiency Standards

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020. The 2019 Title 24 standards include efficiency improvements to the lighting and efficiency improvements to the non-residential standards including alignment with the American Society of Heating and Air-Conditioning Engineers.

The 2022 California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. Specifically, the code requires the following measures that apply to energy use:

- New buildings with tenant spaces that have 10 or more tenant-occupants provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.
- New buildings that require 10 or more parking spaces provide a specific number of spaces to facilitate the future installation of electric vehicle supply equipment. The raceways are required to be installed at the time of construction.

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law in September 2018 and increased the goal of the California RPS Program to achieve at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

4.6.2 Environmental Setting

SDG&E provides electric services to 3.6 million customers through 1.4 million electric meters located in a 4,100-square-mile service area that includes San Diego County (County) and southern Orange County

(SDG&E 2021). SDG&E is a subsidiary of Sempra Energy and would provide electricity to the proposed project. According to the California Public Utilities Commission (CPUC), SDG&E customers consumed approximately 19,169 million kilowatt-hours (kWh) of electricity in 2015 (CPUC 2016). SDG&E is forecasted to reach 49% renewable energy in 2021, 98% of which will be from long-term contracts (SDG&E 2018).

Based on recent energy supply and demand projections in California, statewide annual peak electricity demand is projected to grow an average of 890 megawatts per year for the next decade, or 1.4% annually, and consumption per capita is expected to remain relatively constant at 7,200– 7,800 kWh per person (CEC 2014).

SDG&E provides natural gas service to the Counties of San Diego and Orange and would provide natural gas to the proposed project. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from refineries located in California. Gasoline is the most used transportation fuel in California with 15.5 billion gallons sold in 2017 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2018). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (CEC 2016). Both gasoline and diesel are primarily petroleum-based, and their consumption releases greenhouse gas (GHG) emissions, including CO₂ and NO_x. The transportation sector is the single largest source of GHG emissions in California, accounting for 41 percent of all inventoried emissions in 2016 (CARB 2018).

4.6.3 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion

- a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less Than Significant Impact. The Project will not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. Information from the CalEEMod 2020.4.0 Daily and Annual Outputs contained in the air quality and greenhouse gas analyses (Appendix B) were utilized to determine the potential energy demand. The CalEEMod outputs detail Project-related construction equipment, transportation energy demands, and facility energy demands. Electricity used for the Project during construction and operations would be provided by SDG&E, which serves more than 15 million customers. SDG&E derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. Natural gas would be provided to the Project by SDG&E. Project-related vehicle trip energy consumption will be predominantly gasoline and diesel fuel. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets.

Construction Energy

The Project's estimated energy consumption during construction is provided in Appendix C (refer to Tables 2.2-1 through 2.2-2). In summary, the usage was estimated as follows:

- Table 2.2-1: Construction Equipment Fuel Demand: 6,704 gallons.
- Table 2.2-2: Construction Worker Fuel Consumption Estimates: 703 gallons.

Construction of the Proposed Project would require the typical use of energy resources. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Project construction is required to comply with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Therefore, Project compliance with State regulations will reduce construction impacts to less than significant and no mitigation would be required.

Operations

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site)

and facilities energy demands (energy consumed by building operations and site maintenance activities). This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The largest source of operational energy use would be the vehicle operation of the Proposed Project's residents. The energy analysis in Appendix C identified that the Proposed Project would utilize the following during operations:

Electricity:

- Multi-Family Housing 67,817 kWh/year
- Parking Lot 18,545 kWh/year

Natural Gas:

- Multi-Family Residential 141,569 kBtu/year

Energy standards for new buildings are identified by the State of California through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes a review of design components and energy conservation measures that occur during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC); energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts on peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, the operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur.

Table 22 in Appendix A identifies that the Project's annual operational energy demand according to the CalEEMod 2020.4.0 model annual output would be as follows:

- Natural Gas – General Office Building: 257,462 kBtu/year (kilo British thermal units)
- Electricity – General Office Building: 689,820 kWh/year
- Electricity – Parking Lot: 35,000 kWh/year

The Project would also comply with the CALGreen Code as it:

- Provides indoor secure bicycle facilities.

The site's Proposed Land Use is residential and would be similar to the residential land uses in the area. As such, the energy demands of the Project would be accommodated within the context of the planned availability of resources and energy delivery systems by City and Regional planning documents.

The Project therefore would not cause or result in the need for additional energy-producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California particularly because the

Project would incorporate California's Energy Efficiency Standards and 2020 CALGreen Standards. Therefore, there is a less than significant impact, and no mitigation would be required.

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

Less Than Significant Impact. The Proposed Project is to convert an existing office building in an urban area to residential use. The Project improvements would be required to meet or exceed the energy standards established in CALGreen, Title 24, Part 11.

Through compliance with the Title 24 requirements, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Given the above, the Proposed Project would have a less than significant potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.4 Mitigation Measures

No mitigation measures associated with impacts to Energy apply to the Proposed Project.

4.6.5 Conclusion

No potentially significant impacts of the Proposed Project are associated with Energy, and no mitigation would be required.

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4.7 GEOLOGY AND SOILS

4.7.1 Environmental Setting

The Project site is developed with a medical office building and is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west.

4.7.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS:				
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
<ul style="list-style-type: none"> 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. 				X
<ul style="list-style-type: none"> Strong seismic ground shaking? 			X	
<ul style="list-style-type: none"> Seismic-related ground failure, including liquefaction? 				X
<ul style="list-style-type: none"> Landslides? 				X
b) Result in substantial soil erosion or the loss of topsoil?				X
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- site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				X
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?				X

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

Discussion

a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

- *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.*

No Impact. The Project Site is not included within any Earthquake Fault Zones as created by the Alquist-Priolo Earthquake Fault Zoning Act according to the California Dept of Conservation *Earthquake Zones of Required Investigation map*⁷. There are no known active or potentially active faults located within or immediately adjacent to the Project Site. The nearest fault to the Project Site is the Elsinore fault zone, which is located approximately 3 miles east of the site.

- *Strong seismic ground shaking?*

Less Than Significant Impact. The site is situated in an area of high regional seismicity. The nearest fault to the Project Site is the Elsinore fault zone, located approximately 3 miles east of the site. Since no known faults are located within or near the Project Site, surface fault rupture is not anticipated. However, due to the proximity of known active and potentially active faults, severe ground shaking should be expected during the life of the proposed structures.

The existing office building where the Project improvements would occur was constructed in approximately 1978. Therefore, it is assumed that the existing office building is compliant with California building codes regarding seismic compliance. Therefore, the proposed Project would not expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking more than other developments in Southern California. Therefore, the impacts are less than significant, and no mitigation would be required.

⁷ Accessed at: <https://maps.conservation.ca.gov/cgs/EQZApp/>, February 17, 2024

- *Seismic-related ground failure, including liquefaction?*

No Impact. Liquefaction is a mode of ground failure that results from the generation of high pore-water pressures during earthquake ground shaking, causing loss of shear strength, and is typically a hazard where loose sandy soils exist below groundwater. The Project Site is not identified in Figure VI-9 of the City's General Plan⁸ as having a liquefaction potential. Therefore, the impacts are less than significant, and no mitigation would be required.

- *Landslides?*

No Impact. Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The Project Site is not identified in Figure VI-9⁹ of the City's General Plan as having soils subject to a potential landslide or a slope greater than 25 percent. The Project Site and the adjacent parcels are relatively flat, with some low hilly terrain. There are no steep slopes, and no landslides on or adjacent to the Project site would occur. Therefore, there is no impact, and no mitigation would be required.

Based on the above, the Project will have a less than significant impact regarding exposure to people or structures to potential substantial adverse effects of earthquakes, ground shaking, liquefaction, and landslides, and no mitigation would be required.

- b) *Result in substantial soil erosion or the loss of topsoil?*

No Impact. Project improvements are to an existing structure, and no excavation that would expose top soil is anticipated. Therefore, there would be no impact, and no mitigation would be required.

- 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?*

No Impact. Refer to the above discussion regarding hazards associated with liquefaction and landslide hazards. As noted, there is no potential for landslide and low potential for liquefaction. Therefore, because no aspects of the Proposed Project could increase the likelihood of landslides, lateral spreading, subsidence, or liquefaction, there would be no impacts, and no mitigation would be required.

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

⁸ City of Escondido General Plan Chapter VI-Community Protection
<https://www.escondido.org/DocumentCenter/View/2502/Chapter-VI---Community-Protection-PDF> Accessed June 17, 2024

⁹ City of Escondido General Plan Chapter VI-Community Protection
<https://www.escondido.org/DocumentCenter/View/2502/Chapter-VI---Community-Protection-PDF> Accessed June 17, 2024

No Impact. Expansive soil is a soil/clay (such as montmorillonite or bentonite) that is prone to expansion or shrinkage due directly to variations in water volume. Expansive soils swell when exposed to large amounts of water and shrink when the water evaporates. This continuous cycle of wet to dry soil keeps the soil in perpetual motion causing structures built on this soil to sink or rise unevenly, often requiring foundation repair. Expansive soils are comprised primarily of minerals (incredibly fine particles) with little to no organic material and are thus incredibly viscous, proving difficult to drain.

The Project would occur within an existing office building that was constructed in approximately 1978. Therefore, there would be no impacts regarding expansive soils, and no mitigation would be required.

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

No Impact. The Project does not propose to install septic tanks or alternative wastewater disposal systems. No impacts would occur, and no mitigation would be required.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No Impact. The Project Site is relatively flat, located in an urbanized area, and there are no rock outcroppings or unique geologic features within the Project Site or project vicinity. The Proposed Project is to convert an existing office building to residential use. No excavation is required for this project that would expose or otherwise destroy any paleontological resources. No impacts would occur, and no mitigation would be required.

4.7.3 Mitigation Measures

No mitigation measures associated with impacts to Geology and Soils apply to the Proposed Project.

4.7.4 Conclusion

There are no potential impacts of the Proposed Project associated with Geology and Soils, and no mitigation would be required.

4.8 GREENHOUSE GAS EMISSIONS

This section describes the potential energy usage effects from the implementation of the Proposed Project for both construction activities as well as long-term operations and is based on information provided in **the *Air Quality and GHG Technical Memorandum, prepared by KPC EHS Consultants, LLC, revised June 12, 2024 (Appendix B).***

4.8.1 Regulatory Setting

Since 1988, many countries around the world have tried to reduce GHG emissions since climate change is a global issue. Over the past 30 years, the United States, and the State of California, have enacted a myriad of regulations that have evolved aimed at reducing GHG emissions in transportation, building, and manufacturing sectors.

The City of Escondido developed an update to the 2013 Climate Action Plan (CAP). The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. The CAP's strategies and measures are designed to reduce GHG emissions for build-out under the General Plan. The CAP does so by (1) calculating a baseline GHG emissions level as of 2012, (2) estimating future 2030 and 2035 emissions under a business-as-usual standard, and (3) implementing state-mandated GHG reduction targets. Measures to reduce GHG emissions for projects with land uses consistent with the City's General Plan are found in the CAP.

The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), and Guidance for Demonstrating Consistency with the City of Escondido CAP for Discretionary Projects Subject to CEQA Memorandum in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review according to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at 500 metric tons of carbon dioxide equivalent [MTCO₂e] per year) for new development projects to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. The memorandum also describes the application of a numerical GHG threshold (set at 2.0 MTCO₂e per service population (SP) per year) for use as a supplemental method for demonstrating consistency with the CAP.

4.8.2 Environmental Setting

Constituent gases of the Earth's atmosphere, called atmospheric GHG, play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO₂), methane (CH₄), O₃, water vapor, nitrous oxide (NO₂), and chlorofluorocarbons. This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO₂ and NO₂ are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas,

results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. Table 6 in Appendix B describes each of the greenhouse gases and their global warming potential.

For Greenhouse Gas Analysis (Appendix B), the focus was on emissions of CO₂, CH₄, and NO₂ because these gasses are the primary contributors to Global Climate Change (GCC) from development projects. Although other substances such as fluorinated gases also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

4.8.3 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Discussion

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. The Proposed Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment. GHG emissions have been calculated with the CalEEMod model based on construction and operational parameters (Appendix B).

The Climate Action Plan Consistency Review Checklist (Checklist) was completed for the proposed Project and is included in Appendix B. Under Step 1: Land Use Consistency Question #2 if the project is not consistent with the General Plan land use designation and includes a General Plan Amendment. GHG emissions estimates must be provided for the existing land use and the proposed land use. GHG emissions for the existing land use and the proposed Project land use were estimated by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. Operational GHG emissions for each scenario are detailed in Appendix B and summarized in Table 7.

Table 7
Existing and Proposed Operational Greenhouse Gas Emissions

Use	Total CO ₂ E Metric Tons Per Year	Exceeds Threshold?
Escondido Threshold	500	---
Existing Use – Office	645	YES
Proposed	169	NO

Therefore, the Proposed Project represents a 74 percent reduction in GHG emissions. Therefore, potential impacts associated with the generation of greenhouse gas emissions would be less than significant, and no mitigation would be required.

- b) *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less Than Significant Impact. The analysis above considered the GHG emissions of the proposed project in comparison to the City’s GHG screening thresholds that are identified in the City’s CAP. The CAP Checklist screening level suggests that projects that emit fewer than 500 MT CO₂e would have a less than significant impact on the environment. The Project represents a 74 percent reduction in GHG emissions. Therefore, potential impacts associated with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less than significant, and no mitigation would be required.

4.8.4 Mitigation Measures

No mitigation measures associated with impacts to Greenhouse Gas apply to the Proposed Project.

4.8.5 Conclusion

No potentially significant impacts of the Proposed Project are associated with Greenhouse Gas, and no mitigation would be required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Environmental Setting

The Project site is developed with a medical office building and is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west.

4.9.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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 or excessive noise to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires?				X

Discussion

- 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. A hazardous material is a substance that is toxic, flammable/ignitable, reactive, or corrosive. Extremely hazardous materials are substances that show high or chronic toxicity, carcinogenic, bio-accumulative properties, persistence in the environment, or that are water-reactive. Improper use, storage, transport, and disposal of hazardous materials and waste may result in harm to humans, surface and groundwater degradation, air pollution, fire, and explosion.

Construction of the Proposed Project would involve the use of construction-related chemicals. These include but are not limited to hydraulic fluids, motor oil, grease, runoff, and other related fluids and lubricants. The construction activities would involve the disposal and recycling of materials, trash, and debris. With mandatory regulatory compliance with federal, State, and local laws, potential hazardous materials impact associated with the construction of the Project would be less than significant, and no mitigation would be required.

Given that the operation of the Proposed Project would be residential units, the need for the transportation and/or storage of hazardous materials is considered to be low. In any event, operations would be required to comply with all federal, State, and local laws about hazardous materials handling, transport, use, and disposal. Therefore, with mandatory regulatory compliance with federal, State, and local laws, potential hazardous materials impact associated with the operations of the Project would be less than significant, and no mitigation would be required.

- 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. Construction and operation of the Project would involve the routine transport, use, or disposal of hazardous materials on- and off-site.

Construction

Construction activities would require the temporary use of hazardous substances, such as fuel, lubricants, and other petroleum-based products for the operation of construction equipment as well as oil, solvents, or paints. As a result, the Proposed Project could result in the exposure of persons and/or the environment to an adverse environmental impact due to the accidental release of a hazardous material. However, the transportation, use, and handling of hazardous materials would be temporary and would coincide with the short-term Project construction activities. Further, these materials would be handled and stored in compliance with all applicable federal, state, and local requirements, any handling of hazardous materials would be limited to the quantities and concentrations set forth by the manufacturer and/or applicable regulations, and all hazardous materials would be securely stored in a construction staging area or similar designated location within the Project site. In addition, the handling, transport, use, and disposal of hazardous materials must comply with all applicable federal, state, and local agencies and

regulations, including the Department of Toxic Substances Control (DTSC); Occupational Health and Safety Administration; Caltrans; and the County Health Department - Hazardous Materials Management Services.

With compliance with local, state, and federal regulations short-term construction impacts associated with the handling, transport, use, and disposal of hazardous materials would be less than significant.

Therefore, because the Applicant is required to comply with federal, State, and local regulations, impacts associated with the handling, transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment would be less than significant, and no mitigation would be required.

Operations

The operation of the Proposed Project may involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). However, with required compliance with federal, State, and City regulations, standards, and guidelines about hazardous materials management, there would be a less than significant hazard to the public or the environment through routine use, storage, or disposal of hazardous materials, and no mitigation would be required.

Radio Frequency Impacts Wireless Communication Facility

AT&T operates a wireless communication facility located on the rooftop of the existing medical building. To address whether the facility would create an adverse impact on future residents from Radio Frequency (RF) exposure, the facility was reviewed against Federal Communication (FCC) RF emission guidelines. The FCC adopted these limits following recommendations from the U.S. Environmental Protection Agency, the Food and Drug Administration, and other federal health and safety agencies. The FDA's Director of the Center for Devices and Radiological concludes that "the totality of the available scientific evidence continues to not support adverse health effects in humans caused by exposures at or under the current radiofrequency energy exposure limits." Moreover, the World Health Organization concludes that "there is no convincing scientific evidence that the weak RF signals from base stations [i.e., cell sites] and wireless networks cause adverse health effects." Thus, in December 2019, after a more than six-year public review process, the FCC concluded that these RF exposure standards continued to protect public health.

AT&T maintains a rigorous RF safety program to keep its exposure levels below the conservative FCC limits. AT&T performed a worst-case analysis for the site to evaluate the cell site for RF exposure before construction and it is reevaluated for RF exposure before each modification to the site. Based on the results of the analysis, this site meets all relevant FCC exposure limits. In addition, the antennas are located well above ground and point away from the building.¹⁰ Therefore, no mitigation would be required.

¹⁰ Letter from AT&T, Joel Boado RF Safety Manager Los Angeles Market, dated February 7, 2024. Appendix F of this Initial Study.

- c) *Would the project 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. The Sparks Learning Center, which provides students needing individual instruction and encouragement in reading, writing, and spelling and multi-sensory programs for students with dyslexia and other reading challenges, is located approximately 0.17 miles southwest of the Project Site. The Project, being operated as a residential type use, would not emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Any urban materials that are labeled hazardous would be handled in compliance with federal, State, and City materials. Therefore, the Proposed Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. As such, impacts would be less than significant, and no mitigation would be required.

- d) *Would the project 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?*

No Impact. Government Code Section 65962.5(a)(1) requires that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) all hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).” The hazardous waste facilities identified in HSC § 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC § 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment. This is known as the “Cortese List.” This is a very small and specific subgroup of facilities, and they are not separately posted on the DTSC or Cal/EPA’s website. The following databases that meet the “Cortese List” requirements were reviewed for this Project.

- Envirostore Database. There are no sites listed in the Envirostore Database within 1,000 feet of the Project site.
- Geotracker Database. Geotracker is the SWRCB’s database that manages potential hazardous sites to groundwater. There are no sites listed in the Geotracker Database within 1,000 feet of the Project site.

Based on the result of the database review the Project site is not located on any site that has been identified following Section 65962.5 of the Government Code.

Therefore, there are no impacts because the Project Site is not located on any site that has been identified per Section 65962.5 of the Government Code, therefore, no mitigation would be required.

- e) *For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The Project Site is not located within two miles of an airport. The closest airports to the Project site are the McClellan Palomar Airport approximately 12 miles west and Ramona Airport approximately 11 miles southeast. No impacts would occur, and no mitigation would be required.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No Impact. Development of the Project site would not interfere with any of the daily operations of the City emergency response plan. Access to the Proposed Project is via one driveway on Hickory Street with adequate spacing so as to not block access for fire department vehicles.

The Proposed Project would not interfere with the City's emergency operations plan or impede roadway access through the removal or closure of any streets. All construction activities would be required to be performed according to the standards and regulations of the City Fire and Police departments. For example, the Property Owner/Developer and construction contractor would be required to provide on- and offsite access and circulation for emergency vehicles and services during the construction and operation phases.

Overall, the Proposed Project would not impair the implementation of or physically interfere with the City's emergency operations plan or evacuation plan. Impacts would be less than significant, and no mitigation would be required.

- g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

No Impact. The Cal Fire-Fire Hazard Severity Zones Maps Public Resources Code 4201-4204 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map fire hazards within State Responsibility Areas (SRA) based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. These zones, referred to as Fire Hazard Severity Zones (FHSZ), classify a wildland zone as a Moderate, High, or Very High fire hazard based on the average hazard across the area included in the zone.¹¹ According to the Cal Fire Map applicable to the Project Site, the Project is not located in an area subject to wildland fires. Therefore, the Project would not expose people or structures to wildfire, and no mitigation would be required.

4.9.3 Mitigation Measures

No mitigation measures associated with impacts to Hazards and Hazardous Materials apply to the Proposed Project.

4.9.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Hazards and Hazardous Materials, and no mitigation would be required.

¹¹ Cal Fire, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022>, Accessed February 19, 2024.

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Regulatory Setting

The proposed project is located within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB).

4.10.2 Environmental Setting

The Project Site is an existing, fully developed office building with existing stormwater controls. The Proposed Project would retain the existing stormwater management controls.

4.10.3 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY:				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
<ul style="list-style-type: none"> result in substantial erosion or siltation onsite or offsite; 			X	
<ul style="list-style-type: none"> substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite; 			X	
<ul style="list-style-type: none"> create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or 			X	
<ul style="list-style-type: none"> impede or redirect flood flows? 				X

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Discussion

- a) *Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact.

Construction

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). Construction projects that disturb 1 acre or more of soil, including the Proposed Project, are regulated under the CGP (2009-0009-DWQ - Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activity) and its subsequent revisions (Order No. 2012-0006-DWQ) issued by the SWRCB. Projects obtain coverage under the CGP by developing and implementing a SWPPP, estimating sediment risk from construction activities to receiving waters, and specifying best management practices that would be implemented as a part of the project’s construction phase to minimize pollution of stormwater before and during grading and construction. Therefore, the Proposed Project is required to obtain coverage of the CGP.

Project components would occur largely in the interior of an existing building. No excavation or site work is proposed that would disturb more than 1 acre of soil. Best management practices for erosion control would be employed to develop open space areas, which are less than 1 acre.

Operations

The Proposed Project involves converting an existing office building to residential use. There are no additional stormwater controls that are required for the Proposed Project.

Because the Project does not propose changes to the existing stormwater system, nor will it be creating any new impervious surface, impacts would be less than significant, and no mitigation would be required.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less Than Significant Impact. Implementation of the Proposed Project would not use any groundwater. Therefore, the Proposed Project would not substantially deplete groundwater supplies. The project will increase the amount of impervious surface on the Project Site; however, the project would not 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. The Proposed Project would not impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation would be required.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:*

- *result in substantial erosion or siltation onsite or offsite;*

Less Than Significant. No grading is proposed that exceeds 5,000 sf of ground disturbance. Therefore, the Project would not result in substantial erosion or siltation off-site. No impacts would occur, and no mitigation would be required.

- *substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite;*

No Impact. The Proposed Project would retain the existing surface water runoff patterns, which do not result in flooding on or off-site. No impacts would occur, and no mitigation would be required.

- *create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

Less Than Significant Impact. Refer to the answers above.

- *impede or redirect flood flows?*

No Impact. The Project Site occurs in a developed urban area does not contain any natural drainages or waterways. Therefore, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation would be required.

- d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less Than Significant. The FEMA Flood Insurance Rate Map Number 06073C1077G, effective on 5/16/2012,¹² indicates that the Project site is not located within any flood hazard areas. The

¹² FEMA Flood Maps. Available at:
<https://msc.fema.gov/portal/search?AddressQuery=240%20s.%20hickory%20street%20escondido>. Accessed February 19, 2024.

Project site is not adjacent to any impounded bodies of water; therefore, the Project Site is not at risk of a seiche. Figure VI-8¹³ of the City's General Plan identifies that the Project Site is located in the inundation area for both the Lake Wohlford Dam and the Dixon Lake Dam. However, the Project Site is among multiple properties that are part of the inundation area for both dams, and the impact would not be limited to the Project Site. Therefore, impacts would be less than significant, and no mitigation would be required.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. The Proposed Project's construction contractor would be required to adhere to best management practices for construction stormwater management. The Proposed Project includes only minor modifications to pavement, and no excavations or infrastructure are proposed that would conflict with water quality control plan or sustainable groundwater management plan. Impacts would be less than significant, and no mitigation would be required.

4.10.4 Mitigation Measures

No mitigation measures associated with impacts to Hydrology and Water Quality apply to the Proposed Project.

4.10.5 Conclusion

No potentially significant impacts of the Proposed Project are associated with Hydrology and Water Quality, and no mitigation would be required.

¹³ City of Escondido General Plan Chapter VI-Community Protection
<https://www.escondido.org/DocumentCenter/View/2502/Chapter-VI---Community-Protection-PDF> Accessed June 17, 2024

4.11 LAND USE PLANNING

4.11.1 Environmental Setting

The approximately 0.69-acre Project Site is generally located on the northeast corner of South Hickory Street and East 3rd Avenue, approximately 0.7 mile east of Centre City Parkway (Figure 1). The Project Site is situated within an area of multi-family residences and medical office buildings. Table 1 identifies the surrounding land uses.

The Project Site is situated at 240 South Hickory Street and currently contains one office building with existing medical office units that range in size from approximately 400 SF to 900 SF. The northern, eastern, and southern perimeter of the site is landscaped and contains grass, trees, and a few decorative shrubs. The project site is flat with existing ADA-compliant sidewalks along its frontage and sidewalks on surrounding streets.

Site Zoning and General Plan Designations

The Project Site is zoned as Hospital Professional (HP) which provides for a maximum density of 2.0 Floor Area Ratio (FAR). The Project Site's General Plan land use designation is Office.

Residential units exist south and east of the Project Site and are zoned Light Multiple Residential (R-2-12), which is designed for single-family dwellings, duplexes, and apartments low in height and density. Density for R-2-12 equates to up to 12 units per acre.

West of the Project Site, on the west side of Hickory Street, lies Planned Development-Residential (PD-R-12). The Planned Development process is designed to encourage the planned development of parcels sufficiently large to permit comprehensive site planning and building design; to provide a more flexible regulatory procedure by which the basic public purposes of the Escondido General Plan and the Escondido Zoning Code may be accommodated; to encourage creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of several land uses, activities and dwelling types; to enhance the appearance and livability of the community through encouragement of creative approaches to the use of land and the design of facilities, etc.

4.11.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING:				
Would the project:				
a) Physically divide an established community?				X
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?			X	

Discussion

a) *Would the project physically divide an established community?*

No impact. The Project site is developed with a medical office building and is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west. Conversion of the existing office building to apartments would not physically divide an established community.

b) *Would the project 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. As detailed throughout this Initial Study document, the Project has been evaluated to determine if it would 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.

General Plan Amendment and Zone Map Amendment

The Project site is approximately 0.69 acres in size and contains one, three-story structure historically used for medical offices. The existing building contains a total of approximately 16,885 square feet (sf) of gross building area. The site is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west. The project site has a land use designation of General Office (2.0 FAR) and the current zoning designation for the Project site is Hospital Professional (H-P), which is considered a commercial zoning designation for interim development of medical or office use.

Surrounding zoning and land use designations include H-P and Office to the north, Light-Multiple Residential (R-2-12) and Office to the east, R-2-12 and Urban II (U2) to the south, and Residential Planned

Development (PD-R-12) and U2 to the west. With the demolition and subsequent planned redevelopment of the old Palomar Hospital property, the surrounding area is seeing a decline in the need or demand for medical office support services in the East Valley neighborhood area, including at the Project site. Adaptive reuse of housing units would allow for land use consistent with the surrounding neighborhood and construction that would be minimally impactful since it would primarily involve interior changes. Upon adoption of the General plan Amendment and Zone Map Amendment, the Project would be consistent with the General Plan as discussed in **Table 7 – Consistency with Land Use Plans, Policies, or Regulations by Environmental Impact Category** and **Table 8 - Consistency with General Plan Quality of Life Standards** below.

Consistency with Land Use Plans, Policies, or Regulations by Environmental Impact Category, Table 7 below lists the plan, policies, or regulations that apply to the Project and where in this Initial Study document consistency is discussed. This analysis fulfills General Plan Policy Environmental Review Policy 18.2: Require environmental review and mitigation of impacts, if necessary, consistent with city, state, and federal requirements for development projects the Planning Area and Environmental Review Policy 18.4: Require all development to conform to the General Plan, Facilities Plans, Areas Plans, and Quality of Life Standards.

Table 8
Consistency with Land Use Plans, Policies, or Regulations

Land Use Plan, Policy, or Regulation	Consistency Analysis in ISMND Section:
AESTHETICS	
<p><i>City of Escondido General Plan, Chapter VII-Resource Conservation</i> Available at: https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF</p>	4.1. Aesthetics
AGRICULTURAL AND FORESTRY RESOURCES	
<p>The site is developed with an existing building so there are no impacts related to agriculture and forestry resources.</p>	4.2. Agriculture and Forestry Resources
AIR QUALITY	
<p><i>2022 San Diego Regional Air Quality Strategy (RAQS).</i> Available at: https://www.sdapcd.org/content/sdapcd/planning.html#:~:text=The%20RAQS%20is%20designed%20to,and%20a%20vehicle%2Ffuels%20program.</p>	4.3. Air Quality
BIOLOGICAL RESOURCES	
<p><i>City of Escondido General Plan, Chapter VII-Resource Conservation</i> Available at: https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF</p> <p><i>Migratory Bird Treaty Act</i> Available at: https://www.fws.gov/law/migratory-bird-treaty-act-1918</p> <p><i>Endangered Species Act - Federal</i> Available at: https://www.fws.gov/law/endangered-species-act</p> <p><i>California Endangered Species Act</i> Available at: https://wildlife.ca.gov/Conservation/CESA</p> <p><i>San Diego Multiple Species Conservation Program (MHCP)</i> Available at: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/San-Diego-MHCP</p> <p><i>City of Escondido, Article 5 Vegetation</i> Available at: https://ecode360.com/43260440?highlight=remove,removed,tree,trees&searchId=17353065787634681#search-highlight-43260440-0</p>	4.4. Biological Resources
CULTURAL RESOURCES	
<p><i>City of Escondido General Plan, Chapter VII-Resource Conservation</i> Available at: https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF</p>	4.5. Cultural Resources
ENERGY	
<p><i>City of Escondido General Plan, Chapter VII-Resource Conservation</i> Available at: https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF</p>	4.3. Air Quality 4.6. Energy

Land Use Plan, Policy, or Regulation	Consistency Analysis in ISMND Section:
<p><i>California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6).</i> Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards</p>	4.8. Greenhouse Gas Emissions
<p><i>2022 California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11).</i> Available at: https://www.dgs.ca.gov/BSC/CALGreen</p>	
<p><i>"The 100 Percent Clean Energy Act of 2018," Senate Bill 100 (SB 100, De León)</i> Available at: https://www.energy.ca.gov/sb100</p>	
<p><i>California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling.</i> Available at: https://casetext.com/regulation/california-code-of-regulations/title-13-motor-vehicles/division-3-air-resources-board/chapter-9-off-road-vehicles-and-engines-pollution-control-devices/article-48-in-use-off-road-diesel-fueled-fleets/section-2449-general-requirements-for-in-use-off-road-diesel-fueled-fleets</p>	
GEOLOGY AND SOILS	
<p><i>Alquist-Priolo Earthquake Fault Zoning Act</i> Available at: https://www.conservation.ca.gov/cgs/alquist-priolo</p>	4.7 Geology and Soils
<p><i>City of Escondido General Plan, Chapter VI- Community Protection.</i> Available at: https://www.escondido.org/DocumentCenter/View/2502/Chapter-VI---Community-Protection-PDF</p>	
<p><i>City of Escondido Municipal Code, Article 13, Soil Investigation</i> Available at: https://ecode360.com/43255129#43255129</p>	
GREENHOUSE GAS EMISSIONS	
<p><i>City of Escondido General Plan, Chapter V- Community Health and Services.</i> Available at: https://www.escondido.org/DocumentCenter/View/2501/Chapter-V---Community-Health-and-Services-PDF</p>	4.8 Greenhouse Gas Emissions
<p><i>City of Escondido General Plan, Chapter VII-Resource Conservation</i> Available at: https://www.escondido.org/DocumentCenter/View/2503/Chapter-VII---Resource-Conservation-PDF</p>	
<p><i>City of Escondido Climate Action Plan</i> Available at: https://www.escondido.org/1106/Policy-and-Regulatory-Documents</p>	
HAZARDS AND HAZARDOUS MATERIALS	
<p><i>FCC Policy on Human Exposure to Radio Frequency Electromagnetic Fields (The Commission's requirements are detailed in Parts 1 and 2 of the FCC's Rules and Regulations [47 C.F.R. 1.1307(b), 1.1310, 2.1091, 2.1093].</i> Available at: https://www.fcc.gov/general/radio-frequency-safety-0</p>	4.9 Hazards and Hazardous Materials
<p><i>Cortese List: Section 65962.5(a)(1)</i> Available at: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/</p>	
HYDROLOGY AND WATER QUALITY	
<p><i>City of Escondido General Plan, Chapter III- Mobility and Infrastructure</i> Available at:</p>	4.10 Hydrology and Water Quality

Land Use Plan, Policy, or Regulation	Consistency Analysis in ISMND Section:
<p>https://www.escondido.org/DocumentCenter/View/2498/Chapter-III---Mobility-and-Infrastructure-PDF</p> <p><i>City of Escondido Municipal Code, Article 2, Municipal Separate Storm Sewer System (MS4) Management and Discharge Control</i></p> <p>Available at: https://ecode360.com/43260856?highlight=management,stormwater&searchId=17362113865252573</p> <p><i>San Diego Regional Water Board, San Diego Region - The Basin Plan</i></p> <p>Available at: https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan</p> <p><i>NPDES 2009 Construction Stormwater General Permit</i></p> <p>Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.html</p> <p><i>FEMA Flood Maps</i></p> <p>Available at: https://msc.fema.gov/portal/search?AddressQuery=240%20s.%20hickory%20street%20escondido.</p>	
LAND USE AND PLANNING	
<p>Refer to <i>Table 7 – Consistency with Land Use Plans, Policies, or Regulations by Environmental Impact Category</i> and <i>Table 8- Consistency with General Plan Quality of Life Standards</i></p>	4.11 Land Use and Planning
MINERAL RESOURCES	
<p>The site is developed with an existing building so there are no impacts related to mineral resource extraction.</p>	4.12 Mineral Resources
NOISE	
<p><i>City of Escondido Municipal Code, Article 12 -Noise Abatement and Control</i></p> <p>Available at: https://ecode360.com/43259848#43259848</p>	4.13 Noise
POPULATION AND HOUSING	
<p>Refer to <i>Table 7 – Consistency with Land Use Plans, Policies, or Regulations by Environmental Impact Category</i> and <i>Table 8- Consistency with General Plan Quality of Life Standards</i></p>	4.11 Land Use and Planning 4.14 Population and Housing
PUBLIC SERVICES	
<p><i>City of Escondido General Plan, Chapter V- Community Health and Services.</i></p> <p>Available at: https://www.escondido.org/DocumentCenter/View/2501/Chapter-V---Community-Health-and-Services-PDF</p> <p><i>City of Escondido General Plan, Chapter VI- Community Protection.</i></p> <p>Available at: https://www.escondido.org/general-plan.aspx</p>	4.15 Public Services
RECREATION	
<p><i>City of Escondido General Plan, Chapter V- Community Health and Services.</i></p> <p>Available at: https://www.escondido.org/DocumentCenter/View/2501/Chapter-V---Community-Health-and-Services-PDF</p>	4.16 Recreation

Land Use Plan, Policy, or Regulation	Consistency Analysis in ISMND Section:
TRANSPORTATION	
<p><i>City of Escondido General Plan, Chapter III- Mobility and Infrastructure</i> Available at: https://www.escondido.org/DocumentCenter/View/2498/Chapter-III---Mobility-and-Infrastructure-PDF</p>	4.17 Transportation
<p><i>City of Escondido Transportation Impact Analysis Guidelines</i> Available at: https://www.escondido.org/Data/Sites/1/media/Engineering/TIACRAIG/EscondidoTransportationImpactAnalysisGuidelines2021.pdf</p>	
TRIBAL CULTURAL RESOURCES	
<p><i>Public Resources Code: 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 5097.94.</i> Available at: http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab_0051-0100/ab_52_bill_20140925_chaptered.html</p>	4.18 Tribal Cultural Resources
UTILITIES AND SERVICE SYSTEMS	
<p><i>City of Escondido General Plan, Chapter III- Mobility and Infrastructure</i> Available at: https://www.escondido.org/DocumentCenter/View/2498/Chapter-III---Mobility-and-Infrastructure-PDF</p>	4.19 Utilities and Service Systems
<p><i>County of San Diego Integrated Waste Management Plan</i> Available at: https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RECYCLING/Files/2022%20Five-Year%20Review.pdf</p>	
<p><i>City of Escondido Municipal Code, Article 5-Separation of Recyclable Material and Organic Waste</i> Available at: https://ecode360.com/43257775?highlight=recyclable,recyclables,recycling,recycling%20recyclables&searchId=17354764833393455#search-highlight-43257775-0</p>	
WILDFIRE	
The Project site is not located in a wildfire area.	4.20 Wildfire

Consistency with General Plan Quality of Life Standards

As required by Municipal Code § 33-924, Coordination of CEQA Quality of Life Standards, and Growth Management Provisions, the Project has been evaluated to ensure consistency with the City's General Plan Quality of Life Standards that are to be considered in comprehensive planning efforts as well as individual project review. As discussed in **Table 9- Consistency with General Plan Quality of Life Standards** below, the Project is consistent with all of the applicable Quality of Life Standards.

Table 9
Consistency with General Plan Quality of Life Standards

Quality of Life Standard	Description	Consistency Analysis
<i>Quality of Life Standard 1: Traffic and Transportation</i>	N/A. This standard applies to the Level of Service (LOS) and is not considered an environmental impact under CEQA.	Refer to the Planning Department Staff Report under separate cover.
<i>Quality of Life Standard 2: Public Schools</i>	The community shall have sufficient classroom space to meet state-mandated space requirements and teacher/student ratios, with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.	Consistent. Section 4.15 (Public Services) analyzed the potential for the project to impact local schools. As discussed, there would be adequate capacity in the schools to serve the students generated by the proposed project. The applicant would also pay school mitigation fees to assist the school district’s long-range plans. The proposed project is consistent with the applicable goals and policies related to schools. The project is consistent with this quality of life standard.
<i>Quality of Life Standard 3: Fire Service</i>	In urbanized areas of the city, an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of ten (10) minutes for supporting companies shall be maintained. A minimum of seven (7) total fire stations each staffed with a PSU engine company shall be in place before the General Plan build-out. For outlying areas beyond a five (5) minute travel time or further than three (3) miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief. Travel time is the elapsed time from a verbal or computerized acknowledgment of the dispatch by the responding unit at the moment of departure from the station to its arrival at the scene. Response time is the elapsed time from receiving a call for service to the responding unit’s arrival at the scene. In the case of single-family residences “arrival at the scene” shall mean at the front door of the residence; for multi-family residences “arrival at the scene” shall mean at the street access to the involved building. The Fire Department intends to meet these times for no less than 90 percent of all emergency responses by engine companies.	Consistent. Section 4.15 (Public Services) analyzed the potential for the project to impact adequate fire protection and emergency medical services. Due to the project’s proximity to existing fire service, as well as payment of public facility fees that go toward addressing the Escondido Fire Department’s needs in equipment and staffing, the proposed project is not expected to impact response time or require the construction of additional facilities. As discussed below, the project is consistent with the applicable goals and policies related to fire protection. The project is consistent with this quality of life standard.

Quality of Life Standard	Description	Consistency Analysis
<p><i>Quality of Life Standard 4: Police Service</i></p>	<p>The city shall maintain personnel staffing levels based on community-generated workloads and officer availability. Resources will be adjusted to maintain an initial response time for Priority 1 calls (crimes in progress or life-threatening) of no more than five (5) minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life-threatening incidents) of no more than six and one-half (6½) minutes. The Escondido Police standard includes the measurement of elapsed times from when the call is initially processed by the communication operator, the transfer of call information to the police officer, and the time of the field officer’s arrival at the service call location. Resources will be allocated to organize patrol areas and to involve community members when appropriate to achieve Community Oriented Problem Solving (COPS) efforts. To the maximum economic extent Escondido Union School District’s L.R. Green Middle School (above) Officers at Escondido’s Police and Fire Central Operations Facility grand opening ceremony Escondido General Plan Vision and Purpose Page I-15 feasible, the Police Department will take aggressive enforcement action against crime trends, including maintenance procedures and incorporating community involvement and education as a means to deter potential incidents</p>	<p>Consistent. Section 4.15 (Public Services) analyzed the potential for the project to impact adequate police protection. Due to the project’s proximity to police services as well as payment of public facility fees that go toward addressing the Escondido Police Department’s needs in equipment and staffing, the proposed project is not expected to impact response time or require the construction of additional facilities. As discussed below, the project is consistent with the applicable goals and policies related to police protection. The project is consistent with this quality of life standard.</p>
<p><i>Quality of Life Standard 5: Wastewater System</i></p>	<p>The city wastewater system shall have adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs. Capacity to treat a minimum of 250 gallons per day for each residence on said system or as established in the city’s Wastewater Master Plan shall be provided.</p>	<p>Consistent. As discussed in Section 4.19 (Utilities and Service Systems), a sewer analysis is not required because the Project would be replacing office sewer usage with residential sewer usage in an area in which the City already has a maintained system. Therefore, impacts on wastewater infrastructure were determined to be less than significant. The project is consistent with this quality of life standard.</p>

Quality of Life Standard	Description	Consistency Analysis
<p><i>Quality of Life Standard 6: Parks System</i></p>	<p>The city shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive parkland and/or open space for habitat preservation per 1,000 dwelling units. Urban recreational amenities such as exercise courses, urban trails, tree-lined shaded walkways, and plazas, etc. shall be focused in high-intensity downtown and urban areas. Priority shall be given to acquiring land to expand Grape Day Park north of Woodward Avenue and developing neighborhood parks in urban areas with the greatest need. School playground areas may be included as park acreage, provided that neighborhood park amenities and facilities are accessible, approval is granted by the school district(s) and the facility is open to the public as determined by the City Council. Before build-out, the city shall provide a minimum of two (2) community centers. Other specialized recreation facilities shall be incorporated into the city's Master Plan for Parks, Trails, and Open Space.</p>	<p>Consistent. As discussed in Section 4.16 (Recreation) as of 2012, the city had 6,556 acres of parkland and open space and, as of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland per 1,000 units, representing an existing surplus of park and open space land. The project includes approximately 2,000 SF of common open space area with grades less than 10 percent including usable open space areas. The project is consistent with this quality of life standard.</p>
<p><i>Quality of Life Standard 7: Library Service</i></p>	<p>The public library system shall maintain a stock and staffing of two (2) collection items per capita and three (3) public library staff per 8,000 residents of the City of Escondido. The city shall provide appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the city before the buildout of the General Plan where feasible. The city shall continue to expand the role of technology in providing library services and resources to Escondido residents.</p>	<p>Consistent. Per the City's General Plan Update EIR, the City does not currently meet this quality of life standard. To meet the proposed quality of life standards identified within the General Plan Update, the Escondido Public Library would need to provide the following by 2035: 79 staff, 420,000 collection items, and 102,333 sf. of facility space. As discussed in Section 4.15 (Public Services) the increase in demand for library services from the development of the proposed project would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects. Impacts on library facilities were determined to be less than significant. The project is consistent with this quality of life standard.</p>

Quality of Life Standard	Description	Consistency Analysis
<i>Quality of Life Standard 8: Open Space System</i>	A system of open space corridors, easements, acquisition programs, and trails shall be established in the Resource Conservation Element. Sensitive lands including permanent bodies of water, floodways, wetlands, riparian and woodland areas, and slopes over 35 percent inclination shall be preserved. Significant habitat for rare or endangered species shall be protected in coordination with state and/or federal agencies having jurisdiction over such areas.	Consistent. As discussed in Section 4.4 (Biological Resources) the project site is currently developed with an office building. The project site is not located in a biologically sensitive area, wildlife corridor, habitat linkage, or an area identified as open space. The project is consistent with all applicable policies related to biological and open space resources. The project is consistent with this quality of life standard.
<i>Quality of Life Standard 9: Air Quality</i>	The city shall establish a Climate Action Plan with feasible and appropriate local policies and measures aimed at reducing regional greenhouse gas emissions. Measures shall include, but not limited to, reducing the number of vehicular miles traveled, supporting public transportation, participating in the development of park-and-ride facilities, coordinating land-use approvals, accommodating facilities for alternative fuel vehicles, maintaining and updating the city’s traffic signal synchronization plan, promoting local agriculture, increasing landscaping standards, promoting landscaping programs, and encouraging non-polluting alternative energy systems.	Consistent. The City of Escondido developed an update to the 2013 Climate Action Plan (CAP) (City of Escondido 2021). The CAP outlines strategies and measures that the city will undertake to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. A GHG study was prepared for the proposed project (Appendix A). As discussed in Section 4.8 (Greenhouse Gas), the project would be consistent with the City’s GHG emissions thresholds and would have less than significant impacts related to the generation of GHG emissions during construction and operation.
<i>Quality of Life Standard 10: Water System</i>	The city shall maintain provisions for an adequate water supply, pipeline capacity, and storage capacity to meet normal and emergency situations and shall have the capacity to provide a minimum of 540 gallons per day per household or as established by the city’s Water Master Plan. Federal and state drinking water quality standards shall be maintained. The city shall continue efforts to implement water reclamation and water conservation programs.	Consistent. As discussed in Section 4.19 (Utilities and Service Systems) analyzed the project’s potential for impacts related to water supply and infrastructure. Based upon the analysis there is adequate water supply and infrastructure to serve the project. The project is consistent with this quality of life standard.

4.11.3 Mitigation Measures

No mitigation measures associated with impacts to Land Use and Planning apply to the Proposed Project.

4.11.4 Conclusion

No mitigation measures associated with impacts to Land Use and Planning apply to the Project. However, mitigation measures are required to comply with the following land use plans, policies, or regulations:

- *Migratory Bird Treaty Act.*
- *City of Escondido Municipal Code, Article 12 -Noise Abatement and Control.*

4.12 MINERAL RESOURCES

4.12.1 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?				X
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?				X

Discussion

- a) *Would the project 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 Project Site is developed with an office building and is not being used for mineral resource extraction.

- b) *Would the project 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. The City’s General Plan does not identify the presence of mineral resource deposits or active extraction operations in Escondido. The project corridor also is zoned for flood control use and not available for mineral resource recovery (Escondido 2019). Therefore, the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur, and no mitigation would be required.

4.12.2 Mitigation Measures

No mitigation measures associated with impacts to Mineral Resources apply to the Proposed Project.

4.12.3 Conclusion

No potentially significant impacts of the Proposed Project are associated with Mineral Resources, and no mitigation would be required.

4.13 NOISE

A Noise Assessment was prepared to determine potential impacts from noise associated with the development of the Proposed Project (**Appendix D – EPC 23-29 Hickory Street Residential Project – Noise Assessment, KPC EHS Consultants, November 17, 2023**).

Environmental noise is commonly measured in A-weighted decibels (dBA). A decibel (dB) is a unit of sound energy intensity. Sound waves, traveling outward from a source, exert a sound pressure level (commonly called a “sound level”) measured in dB. An A-weighted decibel (dBA) is a dB corrected for the variation in frequency response that duplicates the sensitivity of human ears. Decibels are measured on a logarithmic scale. Generally, a three dBA increase in ambient noise levels represents the threshold at which most people can detect a change in the noise environment; an increase of 10 dBA is perceived as a doubling of loudness.

Generally, noise is perceptible at an increase of 3 dBA as illustrated below:

Changes in Intensity Level, dBA	Changes in Apparent Loudness
1	Not perceptible
3	Just perceptible
5	Clearly noticeable
10	Twice (or half) as loud

Source: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm

Noise Descriptors

The noise descriptors utilized in the noise study for this Project include but are not limited to the following:

- Ambient Noise Level: The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.
- Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of five (5) dB to sound levels in the evening from 7:00 to 10:00 PM and after the addition of ten (10) dB to sound levels in the night before 7:00 AM and after 10:00 PM.
- Equivalent Sound Level (LEQ): The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time-varying noise level. The energy average noise level during the sample period.

Vibration

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking

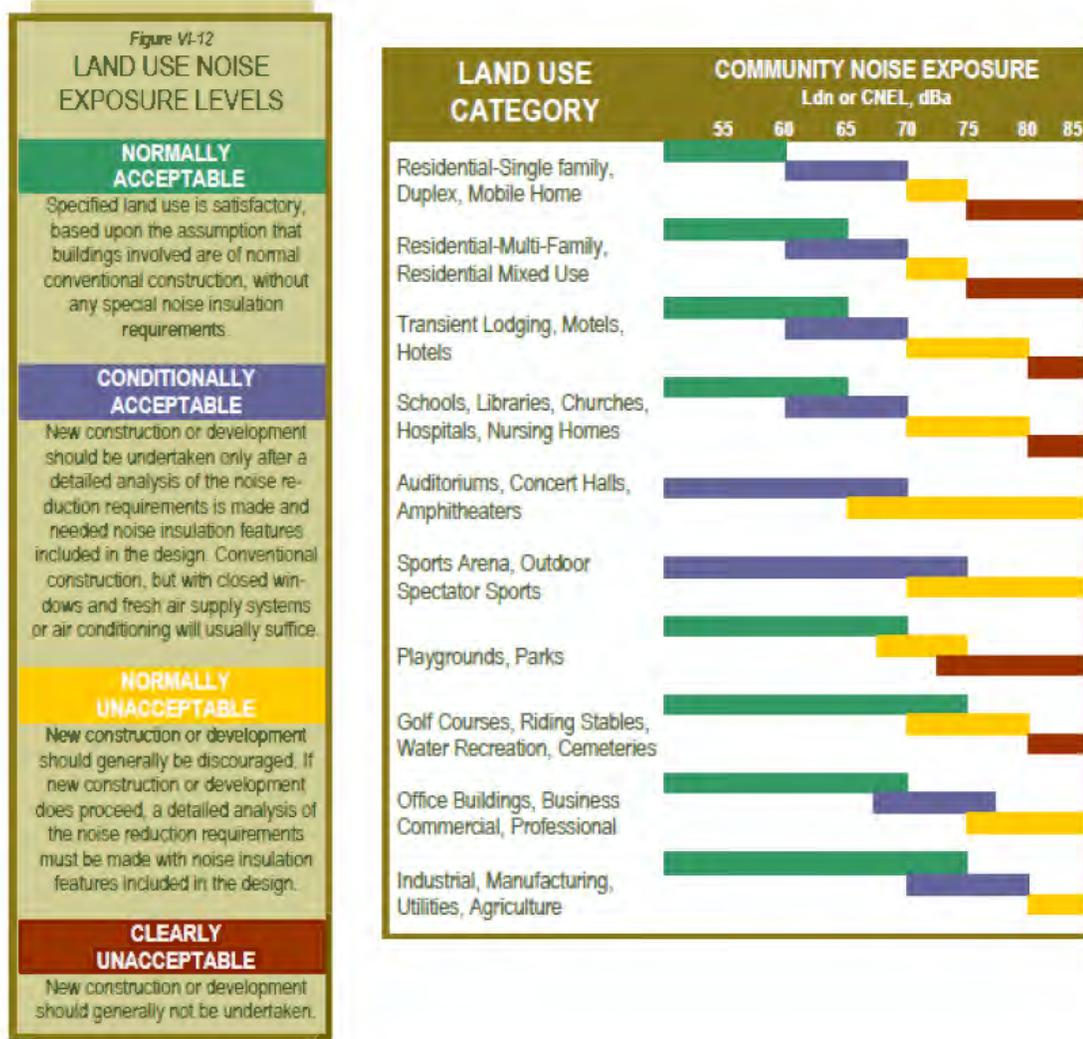
of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

4.13.1 Regulatory Setting

City of Escondido

The City’s General Plan Community Protection Element identifies noise levels associated with common indoor and outdoor noise sources as identified in **Table 10 – Land Use Compatibility Guidelines**, which is excerpted from the City General Plan Noise Element.

**Table 10
 Land Use Compatibility Guidelines**



4.13.2 Environmental Setting

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Sensitive receptor locations are generally identified as facilities where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptors because employees typically are present for shorter periods, such as eight hours.

Residences, schools, hospitals, guest lodging, libraries, churches, nursing homes, auditoriums, concert halls, amphitheatres, playgrounds, and parks are considered noise sensitive. The closest sensitive receptors to the Project site are include residential to the north, northeast, and south, as indicated in **Table 11 – Sensitive Receptor Locations**.

**Table 11
 Sensitive Receptor Locations**

Receptor	Distance from Project Site Boundary (feet)	Distance from Project Construction Center (feet)
Classical Academy High School & Middle Schools	3,280	3,400
Multi-family residential (west)	120	240
Multi-family residential (adjacent property boundary east)	10	95
Residential (north)	30	120
Residential (south)	75	170

The properties surrounding the Project site are residential except for the Town View Professional Center located Northwest and the dental office to the north. The nearest schools are the Classical Academy High School and Middle Schools approximately 3,280 northwest of the north site boundary.

4.13.3 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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 site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive ground borne vibration or ground borne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or 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?				X

Discussion

- a) *Would the project result in 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 with Mitigation Incorporated.

Construction

The Project is proposing to renovate an existing medical office building into a multi-family residential structure. Construction activities that would create noise include interior demolition, site preparation, building construction, paving, and architectural coating. Noise levels associated with the construction will vary with the different types of construction equipment, the duration of the activity, and distance from the source.

During the construction phase the noise levels are anticipated to be the highest during site preparation and paving as heavy equipment pass along the Project site boundaries. During the site preparation and paving phases, which produce the highest noise levels, equipment will not be stationary, rather equipment will be moving throughout the site at varying speeds and power levels and as a result not operating at the maximum noise level for the entire workday. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing levels within the Project vicinity.

Article 12 of Chapter 17 (Offenses – Miscellaneous Provisions) of the City of Escondido Municipal Code identifies the limits for construction hours (Section 17-234. *Construction equipment*). The Project would be required to comply with all provisions of the City’s municipal code regarding construction operation hours and other provisions.

As the equipment will be moving during the site preparation and paving phases the levels of noise at the nearest sensitive receptor are best represented by the levels from the center of the site as indicated in Appendix D, Table 3-4, and 3-5 were all below impact thresholds and would be less than significant.

However, because multi-family residences are located approximately 10 feet from the eastern property boundary, implementation of **Mitigation Measure NOI-1** regarding construction equipment control would ensure that the residences located within 10 feet of the property boundary are not significantly impacted by noise or vibration levels.

Operations

The noise assessment in Appendix D studied the potential noise impacts during operations. Typical operational sound levels generated by multi-family residential activities include normal outdoor conversations, air conditioner units, and landscaping equipment with levels indicated as follows:

- Normal conversation, air conditioner – 60 dBA
- Gas-powered lawnmowers and leaf blowers – 80 to 85 dBA.³

The assessment concluded that the primary source of noise would be from vehicle traffic. Vehicle noise is a combination of the noises produced by the engine, exhaust, and tires. The primary source of noise generated by the Project will be from the vehicle traffic generated by the vehicle ingress and egress to the Project site. Under existing conditions, the site does not generate any traffic noise that impacts the surrounding area.

According to the Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, the level of roadway traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of the traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater numbers of trucks. These factors are discussed below.

- *The Volume of the Traffic*

Upon buildout, the proposed Project is expected to generate approximately 160 average daily vehicle trips (ADT) during the weekdays.

The current average daily vehicle trips along South Hickory Street in the Project area used to determine the project’s impacts was calculated at approximately 4,961 ADT.

According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments¹⁴. A doubling of sound energy (e.g., doubling the volume of traffic

¹⁴ Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. Implementation of the Project will decrease traffic volumes in the area occurring along South Hickory Street from the existing medical office building traffic estimates, therefore, traffic volumes will not be doubled or create a +3dBA noise increase or result in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

- *The Speed of Traffic*

South Hickory Street is a 2-lane road and has a posted speed limit of 25 mph.

- *The Number of Trucks in the Flow of the Traffic*

The Project is a residential development in a primarily residential area. The residential land use will not routinely generate noise from large trucks.

- *Future Traffic Noise Levels Along Existing Roadways Segments*

The roadway noise impacts from vehicular traffic were projected using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model- FHWA-RD-77-108 (the "FHWA Model"). The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major or arterial), the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total average daily traffic (ADT), the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total ADT which flows each hour throughout a 24-hour period.

The Community Noise Equivalent Level (CNEL) is the 24-hour A-weighted average for sound, with corrections for evening and nighttime hours. The corrections require an addition of 5 decibels to sound levels in the evening hours between 7:00 p.m. and 10:00 p.m. and an addition of 10 decibels to sound levels at nighttime hours between 10:00 p.m. and 7:00 a.m. These additions are made to account for the increased sensitivity during the evening and nighttime hours when sound appears louder.

A vehicle's noise level is a combination of the noise produced by the engine, exhaust, and tires. The cumulative traffic noise levels along a roadway segment are based on three primary factors: the amount of traffic, the travel speed of the traffic, and the vehicle mix ratio or number of medium and heavy trucks. The intensity of traffic noise is increased by higher traffic volumes, greater speeds, and increased number of trucks.

Future operations of the proposed Project would decrease the current site operations ADT of 844 vehicles by approximately 684 trips on weekdays as the proposed Project is estimated to generate 160 ADT.

Figure 3.3-1 is the noise contour map generated from the Federal Highway Administration (FHWA) Traffic Noise Model 3.5 showing the estimated traffic noise that will be generated with the current traffic along South Hickory Street and with the Project. To determine the noise impacts existing traffic data was calculated using the traffic generated from the Summit Apartments and the Town View Professional Center. Summit Apartments was calculated based on 128 units at a rate of 8 ADT/du and the Town View Professional Center was calculated based on 61,177 SF at a rate of 50 ADT/KSF along with the current site medical office use ADT of 844 vehicles were used which indicated a daily traffic volume of 4,961 vehicles per day. Average Daily Traffic counts were converted to peak hour estimates with AM Peak rates for the Medical Offices at 6% and the Multi-family Residences at 8%, for PM Peak rates the Medical Offices at 11% and Multi-family at 10%. For Traffic vehicle mix was estimated at 97 percent automobile, 2 percent light truck, and 1 percent heavy trucks at the posted 25 miles per hour roadway speed limit. Additionally, the highest number of peak hour trips would be the PM Peak at 536 trips per hour and deducting the current land use Medical Office Peak traffic with traffic generated by the proposed project would be 459 PM Peak hour trips.

As indicated in Exhibit 3-C and 3-D the noise contours for South Hickory Street shows the proposed Project's impacts do not increase but rather will decrease the noise levels. As indicated in the noise contour exhibits and Table 3-6 impacts along South Hickory Street in the Project Area will not result in new significant noise impacts.

- b) *Would the project result in the generation of excessive ground borne vibration or ground borne noise levels?*

Less Than Significant Impact. A large bulldozer typically yields a worst-case 0.027 PPV (in/sec) which may be perceptible for short periods during grading along the western property line of the Project site but is below any threshold of damage. Any grading activity will take place during the construction phase of the Project and will be temporary. The Proposed Project, once operational, is not likely to cause any ground borne vibration due to the nature of the operation being more of an office-like operation. Therefore, the Project's generation of excessive ground borne vibration or ground borne noise levels is less than significant, and no mitigation would be required.

- c) *For a project located within the vicinity of a private airstrip or 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 closest airports to the Project site are McClellan Palomar Airport approximately 12 miles west and Ramona Airport approximately 11 miles southeast. The Proposed Project would not expose people working in the Project area to excessive noise levels from airports. There would be no impact, and no mitigation would be required.

4.13.4 Mitigation Measures

MM NOI-1: Prior to issuance of grading and/or building permits, a note shall be provided on grading and building plans indicating that, during grading and construction, the

property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:

- The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment.
- The construction contractor shall locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area. In addition, the Project contractor shall place such stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project site.
- The construction contractor shall prohibit unnecessary idling (no more than 5 minutes) of internal combustion engines.
- Equipment shall not be operated along the eastern boundary of the site for more than 30 minutes in duration per hour during construction.
- The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during all project construction.
- The construction contractor shall designate a “disturbance coordinator” who would be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., a bad muffler) and shall require that measures be implemented to correct the problem.
- These measures may only be granted an exception if an application for construction-related exception is made to and considered by the Building Official of the City

4.13.5 Conclusion

Implementation of Mitigation Measures NOI-1 would reduce potentially significant impacts of the Proposed Project associated with Noise to less than significant.

Figure 5 – Existing Noise Contours



Figure 6 – Existing Plus Project Traffic Noise Contours



4.14 POPULATION AND HOUSING

4.14.1 Environmental Setting

Based on the California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2023, the City of Escondido’s population as of January 1, 2023, is 149,799 with a ratio of persons per household of 3.01.

In 2020, the City of Escondido had 49,211 housing units. The housing stock is comprised of approximately 56.6 percent single-family units, 35.6 percent multi-family units, and 7.7% mobile homes (City of Escondido 2022)¹⁵. Based on the Series 14: Regional Growth Forecast, the city is expected to have 54,910 housing units by 2025, 58,990 units by 2035, and 60,618 units by 2050 (SANDAG 2021)¹⁶.

4.14.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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)?			X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X

Discussion

- a) *Would the project induce substantial unplanned 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. Increases in population, housing, and employment are generally considered to be social or economic effects, as opposed to physical effects, which are the focus of CEQA analysis. There are circumstances where social and economic changes could indirectly cause physical environmental impacts or result in changes to environmental resources, such as air quality, traffic, or noise levels. In other situations, lead agencies may evaluate social or

¹⁵ City of Escondido, Sixth Cycle Housing Element, 2021-2029, April 2022, Table 26.

¹⁶ San Diego Association of Governments (SANDAG). 2021. Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern from the 2021 Regional Plan. December https://sdforward.com/docs/default-source/final-2021-regional-plan/appendix-f---regional-growthforecast-and-scs-land-use-pattern.pdf?sfvrsn=8fc1fd65_2 Viewed February 17, 2024

economic change related to a physical change in determining whether the physical change is significant (CEQA Guidelines Section 15131).

Based on the California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2023, the City of Escondido's population as of January 1, 2023, is 149,799 with a ratio of persons per household of 3.01. Based on the number of dwelling units times 3.01 persons per dwelling unit, the Proposed Project would increase the City's population by approximately 63 persons assuming all residents came from outside the City. (3.01 persons/du with 20 units). An increase of 63 to the current population of 149,799 represents an increase of 0.04 % and would not induce substantial population growth.

Jobs that would be created during construction would be short-term and would not increase the City's job base permanently. However, the temporary construction crew and long-term residents of the Project would not create a significant change in demand for goods and services that may induce business investment, growth, or development in the area. Additionally, these increases would be within the anticipated growth for the City as projected by SANDAG.

Additionally, the Proposed Project functions as an infill project and is served by existing roads and utility infrastructure. No extension of roads or infrastructure is proposed by the Project that would encourage development levels beyond what is already planned elsewhere in the City or indirectly induce growth. Therefore, the Project would not result in substantial unplanned population growth, directly or indirectly.

The Project Site is a geographically constrained site, with two street frontages, and fully developed on the remaining two property lines. Therefore, potential impacts associated with population growth would be less than significant, and no mitigation would be required.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Project site is currently a vacant office building. Therefore, the Project will not displace any existing housing and will not necessitate construction of replacement housing elsewhere. Thus, no impact is anticipated.

4.14.3 Mitigation Measures

No mitigation measures associated with impacts to Population and Housing apply to the Proposed Project.

4.14.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Population and Housing, and no mitigation would be required.

4.15 PUBLIC SERVICES

4.15.1 Environmental Setting

Fire and police services are provided by the City of Escondido. The Escondido Union School District provides the school services within the Project vicinity. Recreation services are provided by the City of Escondido.

4.15.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Recreation/Parks?			X	
Other public facilities?			X	

Discussion

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

Fire Protection

Less Than Significant Impact. The closest fire station to the Project site is Fire Station 1 at 310 N. Quince Street, approximately 0.88 miles west of the Project site. This station would be the first to respond to calls for service from the site.

The City of Escondido General Plan identifies that in the urbanized areas of the city, an initial response time of 7½ minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of 10 minutes for supporting companies shall be maintained.

The Proposed Project would result in a resident population of approximately 60 persons, which is a nominal increase in the total number of City residents (estimated at 149,799 in 2021 per the California Department of Finance) served by the Escondido Fire Department. The Proposed Project would convert an existing office building into residential apartments. Given the size of the Project and the net increase in demand for fire protection services over existing uses, the incremental demand of the Project for fire protection services would not result in the need for new firefighters and other personnel, nor would it require the construction of new or the alteration of existing fire protection facilities to maintain an adequate level of fire protection service in the City.

The Applicant would be required to submit building plans that comply with the most current California building codes to ensure the Proposed Project is developed in compliance with all applicable Building and Fire safety requirements. The Project would also be reviewed by the City Fire Marshal for other requirements as necessary to ensure fire safety.

Additionally, the Applicant will be required to pay the appropriate impact fees in effect at the time building permits are issued to offset any potential impact on fire facilities. Development of the Project Site would be within the growth projections for the City, and payment of impact fees would offset the nominal incremental increase in demand for fire protection services and would not result in the need for new or physically altered fire protection facilities.

Therefore, potential impacts associated with fire protection would be less than significant, and no mitigation would be required.

Police Protection

Less Than Significant Impact. The closest police station to the Project Site is Escondido Police and Fire Headquarters located at 1162 North Center City Parkway, approximately 2 miles northwest of the Project Site. The department maintains police officer patrol areas to provide law enforcement for the community.

The Escondido General Plan identifies that the City shall maintain personnel staffing levels based on community-generated workloads and officer availability. Resources will be adjusted to maintain an initial response time for Priority 1 calls (crimes in progress or life-threatening) of no more than 5 minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life-threatening incidents) of no more than 6½ minutes.

The Proposed Project would generate a demand for police protection services during the construction and operation of the Proposed Project once the proposed dwelling units are occupied. The primary response to the Project Site would be by patrol vehicles that are assigned by Beats throughout the City. Although response time to service calls may vary depending upon their location at the time of dispatch, the City's goal is to respond in 6 minutes or less. The incremental demand of the Project for police protection services is not anticipated to increase City of Escondido police response times to the Project Site or surrounding area. The net increase in demand for police protection services over the existing uses is also not anticipated to generate the need for new sworn officers, nor would it require the construction of new or physically altered police protection facilities to maintain an adequate level of service to the Project Site and

surrounding areas. The Applicant would be required to pay development impact fees at the time building permits are issued to offset any potential impact on police facilities. Development of the Project Site would not result in the need for new or physically altered police protection facilities. Therefore, potential impacts associated with police protection would be less than significant, and no mitigation would be required.

Development of the Project Site would not result in the need for new or physically altered police protection facilities. Therefore, potential impacts associated with police protection would be less than significant, and no mitigation would be required.

Schools

Less Than Significant Impact. The Project Site is served by the Escondido Union School District (EUSD) for elementary (grades K-5) and middle school (grades 6-8) and within the Escondido Union High School District (EUHSD) for high school. The EUSD District boundary covers the entire City and some areas within the surrounding unincorporated County. EUSD serves more than 17,000 students and operates 17 elementary schools, one intermediate school (4-8), and five middle schools.

The Proposed Project involves the development of 20 dwelling units that would be occupied by approximately 63 residents with potential school-aged children requiring school services from both the EUSD (Grades K-8) and the EUHSD (Grades 9-12). Using the student generation rate for multifamily residential units provided in the School Facilities Needs Analysis (EUSD 2018)¹⁷ of 0.2142 students per multi-family unit, the construction of 20 multifamily units on the Project Site would generate approximately four students (EUSD 2018).

The additional four students are a negligible increase in school enrollment that will not create an impact. Nevertheless, the Proposed Project would be subject to Senate Bill 50 (SB 50), which requires the payment of mandatory impact fees to offset any impact on school facilities. The Applicant would be required to pay its fair share of school fees under SB 50 based on the number of proposed dwelling units and square footage to offset the potential impact on school services. Therefore, potential impacts associated with schools would be less than significant, and no mitigation would be required.

Recreational/Parks

Less Than Significant Impact. The General Plan Quality of Life Standard #6 states that the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. The City of Escondido General Plan identifies that as of 2012, the city had 6,556 acres of parkland and open space.

The Project Applicant would be required to pay in-lieu fees for improvements to existing City parks and recreation facilities. Therefore, potential impacts associated with park facilities would be less

¹⁷ Escondido Union School District (EUSD). 2018. School Facilities Needs Analysis. Prepared by Cooperative Strategies. March 12. And Escondido Union School District (EUSD). 2020. Facilities Master Plan. <https://www.eusdplan.org/> Viewed February 16, 2024

than significant, and no mitigation would be required. Therefore, impacts would be less than significant.

Other public facilities

Less Than Significant Impact. The City of Escondido contains a variety of civic institutions, including City government offices, and the public library system. Cultural facilities include theaters, libraries, art galleries, and a museum. The Proposed Project would add 60 residents to the City assuming that these residents would come from out of the City.

Since the Proposed Project does not include new housing, impacts related to public services are less than significant, and no mitigation would be required.

4.15.3 Mitigation Measures

No mitigation measures associated with impacts to Public Services apply to the Proposed Project.

4.15.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Public Services, and no mitigation would be required.

4.16 RECREATION

4.16.1 Environmental Setting

There are 28 parks and recreational facilities located throughout the city, including two urban parks, six neighborhood parks, 12 community parks, five open space parks, and three city-owned open spaces. (City of Escondido, General Plan, Chapter 1).

The closest parks to the Project Site include Grape Day Park located at 321 N Broadway, approximately 0.56-mile northwest of the Project Site, and Westside Park, located at 333 S Spruce Street, approximately 1 mile west of the Project Site.

4.16.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Discussion

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Less Than Significant Impact. Impacts on parks and recreational facilities are typically analyzed based on increases in permanent residents from projects involving residential developments.

The General Plan Quality of Life Standard #6 states that the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. The City of Escondido General Plan (Chapter 5) identifies that as of 2012, the city had 6,556 acres of parkland and open space. As of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland per 1,000 units. Thus, the city has an existing surplus of park and open space land as the Quality of Life Standard requires 11.8 acres per 1,000 dwelling units.

In 2020, the City of Escondido had 49,211 housing units which is equivalent to 133 acres of parkland per 1,000 units, assuming that no additional parklands have been added since the 2022 General Plan. Therefore, the City still has a surplus of parkland and open space based on the Quality of Life Standard.

The Project Applicant would be required to pay in-lieu fees for improvements to existing City parks and recreation facilities. Therefore, potential impacts associated with park facilities would be less than significant, and no mitigation would be required. Therefore, impacts would be less than significant.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Project Applicant is proposing to pay park in-lieu fees instead of providing additional parkland, which would provide for the development of new or expanded park facilities in the City as the City deems necessary.

No adverse physical impacts beyond those already disclosed in this document would occur because of the implementation of the Proposed Project's on-site recreational facilities. Further, no construction or expansion of existing facilities off-site would occur as a result of the Proposed Project. Therefore, no impacts associated with the construction or expansion of recreational facilities would occur, and no mitigation would be required.

4.16.3 Mitigation Measures

No mitigation measures associated with impacts to Recreation apply to the Proposed Project.

4.16.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Recreation, and no mitigation would be required.

4.17 TRANSPORTATION

4.17.1 Environmental Setting

The Project site is developed with a medical office building and is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west.

4.17.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Discussion

- a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*

Less Than Significant Impact. The City of Escondido Transportation Impact Analysis Guidelines (TIAG) were adopted on April 21, 2021. This document sets out the methodology for conducting a Local Mobility Analysis (LMA) analysis. The proposed Project would have a net trip generation of 160 average daily trips (ADT). The TIAG establishes a minimum ADT threshold of 200 ADT for requiring an LMA analysis. Since the proposed Project would generate 160 ADT, the Project is considered a small project and screened out from an LMA analysis. The trip generation calculation and applicability of the LMA analysis are summarized in the Transportation Assessment prepared by Linscott, Law, & Greenspan, dated August 29, 2024, and included in Appendix E.

The City’s General Plan Chapter III. Mobility and Infrastructure Element includes “Goal 1”, and numerous related policies, to provide “An accessible, safe, convenient, and integrated multimodal network that connects all users and moves goods and people within the community and region efficiently.” The proposed Project is consistent with that goal by providing roadway improvements

adjacent to the Project site to facilitate both automobile and pedestrian movement. The proposed Project includes sidewalks with landscaping to encourage pedestrian movement. Therefore, the proposed Project is consistent with the adopted plans and policies pertaining to the entire circulation system. Impacts would be less than significant.

Public/Mass Transit

Bus service in the City of Escondido is provided by the North County Transit District. (NCTD)

NCTD currently has no bus stops along either S . Hickory Street or E. 3rd Avenue. The closest bus stop is Route 351 which travels along E. Grand Avenue approximately 0.13 miles (680 feet +/-) mile north of the Project Site. Pedestrian accessibility and connectivity from the Project Site to this bus stop is provided S. Hickory Street northerly to E. Grand Avenue or easterly on E. 3rd Avenue then northerly on S Fig Street to E. Grand Avenue. The Project's construction or operational activities would not impede accessibility to bus routes.

Trails and Bikeways

Currently, there are no bike lanes on S. Hickory Street or E. 3rd Avenue. The Project does not propose to install bike lanes or trails as part of the Project improvements. Therefore, there would be no impact on trails and bikeways. Additionally, the Project would not interfere with a Class II bike lane if one were delineated in the future.

Overall, the Project is compliant with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, potential impacts associated with the circulation system would be less than significant, and no mitigation would be required.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less Than Significant Impact. CEQA Guidelines Section 15064.3 provides that transportation impacts of projects are, in general, best measured by evaluating the Project's VMT. Automobile delay (often called LOS) will no longer be considered to be an environmental impact under CEQA, except in terms of consistency with the City's General Plan where an LOS is identified.

The City of Escondido Transportation Impact Analysis Guidelines (TIAG) were adopted on April 21, 2021. This document sets out the methodology for conducting a Vehicle Miles Traveled (VMT) analysis. The proposed Project would have a net trip generation of 160 average daily trips (ADT). The TIAG establishes a minimum ADT threshold of 200 ADT for requiring a VMT analysis. Since the proposed Project would generate 160 ADT, the Project is considered a small project and screened out from a VMT analysis. The trip generation calculation and applicability of the VMT analysis are summarized in the Scoping Agreement for Transportation Studies, prepared by Linscott, Law, & Greenspan, dated August 29, 2024 and included in Appendix E.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts are less than significant, and no mitigation would be required.

- c) *Would the project 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 Proposed Project does not include the construction or widening of S. Hickory Street or E. 3rd Avenue adjacent to the Project site. However, the City is requiring the following improvements:

The City requires that the Project provide the necessary improvements for on-site circulation improvements, driveway access improvements, and alley improvements (including a 2-way aisle width of 24 feet and turning radius at corners. These improvements will be constructed to meet City standards, and is dependent on the granting of incentives/concessions associated with the Density Bonus request.

- Reconstruct the existing driveway apron off of Hickory St. as a G-14A driveway apron with a pedestrian path of travel "wings" to meet current ADA standards.
- Widen the existing alley entrance at the Project's NW corner in line with the required 2' of alley widening and with a minimum 10' radius. The existing fire hydrant on this corner will likely need to be relocated to accommodate this alley entrance reconstruction.
- Repair the damaged PCC center gutter in the existing alley running along the north side of the site and serving the Project parking lot.

These improvements do not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. The impact is less than significant, and no mitigation would be required.

- d) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. Emergency access to the Project Site will still be provided via S. Hickory Street and E. 3rd Avenue, which are fully improved roadways that currently meet City standards for emergency vehicle access. Therefore, impacts are less than significant, and no mitigation would be required.

4.17.3 Mitigation Measures

No mitigation measures associated with impacts to Transportation apply to the Proposed Project.

4.17.4 Conclusion

No potentially significant impacts of the Project are associated with Transportation, and no mitigation would be required.

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Environmental Setting

The Project site is developed with a medical office building and is surrounded by single-family residences and low-rise medical offices to the north, single-family residences to the east, condominiums and single-family residences to the south, and multi-family residences (Summit Apartments) to the west.

4.18.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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 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), or				X
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.		X		

Discussion

- a) *Would the project 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 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)?*

No Impact. . According to PRC Chapter 2.5, Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and items with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in Section 5020.1.

As discussed in Section 4.5, *Cultural Resources*, of this Initial Study document, the Project site is fully developed with an existing medical office building. It has been determined that there are no sites, features, places, cultural landscapes, sacred places, and items with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in Section 5020.1. Therefore, the Project would not impact a tribal cultural resource that meets the definition of a “historic resource” under CEQA.

- b) *Would the project 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 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?*

Less Than Significant Impact with Mitigation Incorporated. Pursuant to AB 52 and SB18, the City provided notification of the Proposed Project to the Native American Historical Commission (NAHC), and notification letters were sent to the Mesa Grande Band, of Mission Indians, Rincon Band of Luiseño Indians, San Pasqual Band, of Mission Indians, San Luis Rey Band, of Mission Indians, and Soboba Band of Luiseño on May 31, 2023. The San Pasqual requested formal consultation, and the City met with Angelina Gutierrez January 31, 2024, and September 5, 2024. The San Luis Rey Band requested formal consultation, and the City met with Carmen Mojado on August 03, 2023, and August 22, 2024. Both of these consultations closed on September 5, 2024. The Rincon Band of Luiseño Indians requested consultation and consultations between the City and Rincon Band were held on March 31, 2024, and concluded consultation on April 5, 2024.

The following summarizes the results of the consultation.

- San Pasqual Band – Did not express any concerns or recommend any mitigation measures due to project description (office conversion) very limited ground disturbance and develop nature of the site. They requested to be notified if any inadvertent discovery occurs.
- San Luis Rey Band – Did not express any concerns or recommend any mitigation measures due to project description (office conversion) very limited ground disturbance and develop nature of the site. They requested to be notified if any inadvertent discovery occurs.
- Rincon Band- Stated a previously recorded significant habitation site is within 0.25 miles of the project property and additional Luiseño placenames in are in proximity. Tribal monitoring will be required for the ground-disturbing activities. Requested Rincon Band be notified of any changes in project plans.

Mitigation Measures TCR-1 through TCR-10 are required to ensure resources to tribal cultural resources would be mitigated to a less than significant level.

4.18.3 Mitigation Measures

TCR-1. Prior to the issuance of a grading permit, the Applicant shall 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”). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures MM-TCR-2 through MM-TCR-10, and the following information:

- Parties entering into the agreement and contact information.
- Responsibilities of the Property Owner or their representative, archaeological monitors, and tribal monitors.
- Project grading and development scheduling, including determination of authority to adjust in the event of unexpected discovery, and terms of compensation for the monitors, including overtime and weekend rates, in addition to mileage reimbursement.
- Requirements in the event of unanticipated discoveries, which shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and on-site storage of cultural materials.
- Treatment of identified Native American cultural materials.
- Treatment of Native American human remains and associated grave goods.
- Confidentiality of cultural information including location and data.
- Negotiation of disagreements should they arise.
- Regulations that apply to cultural resources that have been identified or may be identified during project construction.

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

TCR-3. The qualified archaeologist and a Native American monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to explain and coordinate the requirements of the monitoring program.

TCR-4. During the initial grubbing, site grading, excavation or disturbance of the ground surface (including both on- and off-site improvement areas), the qualified archaeologist and the Native American monitor shall be present full-time. If the full-time monitoring reveals that the topsoil throughout the Project impact area (both on and off-site) has been previously removed during the development of the roads and buildings within the Project area, then a decrease of monitoring to part-time monitoring or the termination of monitoring can be implemented, as deemed appropriate by the qualified archaeologist in consultation with the Native American monitor. The frequency of subsequent monitoring 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. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring considering these factors. 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 (i.e., soil conditions are comprised solely of fill or granitic bedrock).

TCR-5. In the event that previously unidentified tribal cultural resources are discovered, all work must halt within a 100-foot radius of the discovery. The qualified archaeologist and the Native American monitor shall evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The qualified archaeologist and Native American Monitor shall consider the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c) in determining the significance of a discovered resource. If the professional archaeologist and Native American monitor determine that the find does not represent a culturally significant resource, work may resume immediately, and no agency notifications are required. Isolates and clearly non-significant deposits shall be documented in the field and collected and monitored grading can immediately proceed. All unearthed archaeological resources or tribal cultural resources shall be collected, temporarily stored in a secure location, and repatriated for later reburial on the project site, pursuant to the terms of the Pre-Excavation Agreement.

TCR-6. If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c), the archaeologist shall immediately notify the City of said discovery. The qualified archaeologist, in consultation with the City, the consulting TCA Tribe(s), 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(s) and be submitted to the City for review and approval. If the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c), appropriate treatment measures will be implemented. Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

TCR-7. All sacred sites, significant tribal cultural resources, and unique archaeological resources encountered within the Project area shall be avoided and preserved as the preferred mitigation.

The avoidance and preservation of the significant tribal cultural resource or unique archaeological resource must first be considered and evaluated in consultation with the TCA Tribe(s) as required by CEQA and in compliance with all relevant mitigation measures for the Project. If any significant tribal cultural resource or unique archaeological resource has been discovered and such avoidance or preservation measure has been deemed to be infeasible by the City's Director of Community Development (after a recommendation is provided by the qualified archaeologist, in consultation with the TCA Tribe(s), making a determination of infeasibility that takes into account the factors listed in California Public Resources Code sections 21061.1, 21081(a)(3), and CEQA Guidelines section 15091, and in accordance with all relevant mitigation measures for the Project), then culturally appropriate treatment of those resources, including but not limited to funding an ethnographic or ethnohistoric study of the resource(s), and/or developing 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. No artifact sampling for analysis is allowed, unless requested and approved by the consulting TCA Tribe(s). 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.

TCR-8. As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary 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. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.

TCR-9. If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any 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 for later reburial on the Project site or storage at a local curation facility. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe for reburial on the Project site. Should the TCA Tribe(s) 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.

TCR-10. Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, that describes the results, analysis, and conclusions 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. A copy of the final report will be submitted to the South Coastal Information Center after approval by the City.

4.18.4 Conclusion

With implementation of Mitigation Measures TCR-1 through TCR-10, impacts would be less than significant.

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Environmental Setting

Water is supplied to the Project site by City of Escondido Water Division. Electricity is provided by San Diego Gas and Electric, and natural gas is provided by San Diego Gas and Electric. Public sewer service is served by the City of Escondido.

4.19.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Discussion

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less than Significant Impact. The Proposed Project site would be serviced by the existing electric lines, gas lines, wastewater and water lines adjacent to the Project site. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. The impacts are less than significant, and no mitigation would be required.

- b) *Would the project 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. The City of Escondido provides potable water to its residents and would serve the proposed Project. The Project is currently connected to the City's water system. The City issued a Will Serve letter on April 23, 2024, committing to provide water service to the proposed Project and the City's commitment to serve the proposed Project is consistent with the City's Urban Water Management Plan (UWMP), including normal, dry, and multiple dry years. Impacts would be less than significant. Therefore, impacts to water supply as a result of the Project would be less than significant.

- c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant Impact. The existing office building is currently served by the City's sewer system. The City of Escondido operates the Hale Avenue Resource Recovery Facility (HARRF), which provides wastewater treatment. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day. The average daily flow is 12.7 MGD, comprised of Escondido's flow of 9.7 MGD and Rancho Bernardo's flow of 3.0 MGD. Therefore, while the proposed Project would increase demand on the HARRF, sufficient capacity exists to accommodate the proposed Project. The City issued a Will Serve letter on April 23, 2024, committing to provide wastewater treatment service to the proposed Project. Therefore, the Project has a less than significant impact on wastewater treatment capacity, and no mitigation would be required.

- 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. (EDI) provides waste and recycling services to the City of Escondido. EDI conducts residential waste collection and takes the trash to the Escondido Resource Recovery transfer station, where trash is sorted into recyclable, organics, and refuse. EDI has an extensive program designed to recycle trash consistent with state regulations. AB 341, also called the "Mandatory Commercial Recycling Regulation," requires businesses and multi-family residential dwellings of five units or more, that generate four or more cubic yards of commercial solid waste per week to implement recycling programs, on or after July 1, 2012. The California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. Waste that cannot be disposed of would likely be deposited at the Miramar Landfill. Almost 910,000 tons of trash is disposed of yearly at the Miramar Landfill. The landfill spans over 1,500 acres and opened on Dec.

7, 1959, and has since operated in three areas: north, south and west. The South Miramar Landfill operated from 1959 to 1973. The North Miramar Landfill operated from 1973 to 1983. The West Miramar Landfill, which is still in operation today, opened in 1983. The landfill is expected to have capacity until 2030 (San Diego Union Tribune, 2015). Therefore, impacts would be less than significant.

Construction

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. As indicated above, the landfills that would service the Project have adequate capacity to accommodate such solid waste disposal needs over the short-term. Further, all construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible.” The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2022 (or most recent) Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project’s construction-related solid waste impacts would be less than significant, and no mitigation would be required.

Operations

Solid waste generation is based on the California Emissions Estimator Model (CalEEMod) , which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal. As shown in Appendix B (*EPC 23-29 Hickory Street Residential Project, Air Quality and GHG Technical Memorandum*), the Project could potentially generate 14.8 tons of solid waste per year (81 pounds per day) As described above, the regional landfills have ample capacity to service the Project. The impact would be less than significant, and no mitigation would be required.

- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. All collection, transportation, and disposal of solid waste generated by the Project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. In addition, the state has set an ambitious goal of 75% recycling,

composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill and AB 1826 is a mandatory organic recycling bill. The County adopted its Integrated Waste Management Plan in 1998, which includes the Countywide Summary Plan, Source Reduction and Recycling Elements, and Non-Disposal Facility Elements for the County and each city in the County. Waste generated by the project would enter the City's waste stream but would not adversely affect the City's ability to meet the requirements of AB 939, AB 341, or AB 1826, since the Project's waste generation would represent a nominal percentage of the waste created within the City. The Project would comply with all regulatory requirements regarding solid waste, and impacts associated with solid waste disposal regulations would be less than significant.

4.19.3 Mitigation Measures

No mitigation measures associated with impacts to Utilities and Service Systems apply to the Proposed Project.

4.19.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Utilities and Service Systems, and no mitigation would be required.

4.20 WILDFIRE

4.20.1 Environmental Setting

The City’s General Plan, Figure VI-9 *Wildfire Risk*¹⁸, identifies that the vicinity of the Project Site is located in the City with a moderate risk of wildfire. The City’s high fire areas are primarily located in the foothills, which are approximately 5 miles east of the Project Site.

4.20.2 Impact Analysis

CEQA THRESHOLDS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?				X
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 wildfire?				X
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?				X
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?				X

Discussion

Section XX a) – d)

No Impact. The Proposed Project site is not located within a very high fire hazard severity zone according to City General Plan maps or Local Responsibility and State Responsibility Area maps. Therefore, no impacts associated with wildfire would occur and no mitigation would be required.

¹⁸ City of Escondido General Plan Chapter VI-Community Protection
<https://www.escondido.org/DocumentCenter/View/2502/Chapter-VI---Community-Protection-PDF> Accessed June 17, 2024

4.20.3 Mitigation Measures

No mitigation measures associated with impacts to Wildfire apply to the Proposed Project.

4.20.4 Conclusion

No potentially significant impacts of the Proposed Project are associated with Wildfire, and no mitigation would be required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

4.21.1 Impact Analysis

ENVIRONMENTAL IMPACTS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially 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, substantially 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?		X		
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)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

Discussion

- a) *Does the project have the potential to substantially 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, substantially 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. The Project Site is fully developed with buildings, pavement, and ornamental landscaping which is maintained regularly. As such, there are no sensitive species or are there any historic or cultural resources on the site. However, there are trees that could provide habitat for nesting birds which are protected under the Migratory Bird Treaty Act. **Mitigation Measure BIO-1** is required to reduce potential impacts on nesting birds to less than significant levels.

As discussed in Section 4.5, Cultural Resources, the Project Site consists of a modern office building and is not considered a historic resource, and no mitigation would be required. Additionally, the potential to uncover buried cultural resources is low given that minimal excavation (if any) is required. Therefore, the Project does not contain any resources that are important to major periods of California history or prehistory.

With the implementation of **Mitigation Measure BIO-1**, the Project would not substantially 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 an 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)?*

Less Than Significant Impact with Mitigation Incorporated. As demonstrated by the analysis in this Initial Study document, with implementation of **Mitigation Measures BIO-1, NOI-1, and TCR-1** through **TCR-10**, the Project would not result in any significant and unavoidable environmental impacts because implementation of mitigation measures at the project level would reduce the potential for incremental environmental effects of the Proposed Project when viewed in conjunction with the effects of past projects, current projects, or planned future projects. Project impacts would be less than significant with mitigation incorporated.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant With Mitigation Incorporated. The Project is required to comply with **Mitigation Measure NOI-1** that would reduce impacts on human beings, either directly or indirectly, Implementation of these measures will ensure that Project-specific impacts will be less than significant.

Therefore, with mitigation incorporated, the Proposed Project would not directly or indirectly cause substantial adverse effects on human beings.

4.21.2 Mitigation Measures

NOI-1. Prior to issuance of grading and/or building permits, a note shall be provided on grading and building plans indicating that, during grading and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:

- The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment.

- The construction contractor shall locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area. In addition, the Project contractor shall place such stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project site.
- The construction contractor shall prohibit unnecessary idling (no more than 5 minutes) of internal combustion engines.
- Equipment shall not be operated along the eastern boundary of the site for more than 30 minutes in duration per hour during construction.
- The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during all project construction.
- The construction contractor shall designate a “disturbance coordinator” who would be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., a bad muffler) and shall require that measures be implemented to correct the problem.
- These measures may only be granted an exception if an application for construction-related exception is made to and considered by the Building Official of the City.

4.21.3 Conclusion

With the implementation of **Mitigation Measures BIO-1, NOI-1, and TCR-1 through TCR-10**, impacts would be less than significant.

6 LIST OF PREPARERS

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7 REFERENCES

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference:

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<https://www.escondido.org/DocumentCenter/View/2507/Table-of-Contents-PDF>

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State of California, Department of Conservation, Farmland Mapping and Monitoring Program.

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Code of Federal Regulations, Title 36, Chapter 1

<https://www.ecfr.gov/current/title-36/chapter-I/part-60/section-60.4>

California Register of Historic Resources.

https://ohp.parks.ca.gov/?page_id=21238

Office of Historic Preservation

https://ohp.parks.ca.gov/?page_id=30710.

Appendix C- *EPC 23-29 Hickory Street- Escondido Residential Project- Energy Technical Memorandum* KPC EHS Consultants, LLC, November 16, 2023

California Department of Conservation. Accessed at:

<https://maps.conservation.ca.gov/cgs/EQZApp/>, February 17, 2024

Appendix F- Letter from AT&T, Joel Boado RF Safety Manager Los Angeles Market, dated February 7, 2024.

Cal Fire

<https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022>, Accessed February 19, 2024.

FEMA Flood Maps. Available at:

<https://msc.fema.gov/portal/search?AddressQuery=240%20s.%20hickory%20street%20escondido>.
Accessed February 19, 2024.

Appendix D- *EPC 23-29 Hickory Street Residential Project-Noise Assessment*, KPC EHS Consultants, November 17, 2023

Appendix E- *Transportation Assessment* , Linscott, Law & Greenspan, dated August 29, 2024.

Appendix G- Will Serve Letter, City of Escondido Utilities Department, April 23, 2024