

CHAPTER 5

EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed in the following sections are considered less than significant and do not require mitigation. The reasons for the conclusion of less than significant are discussed below.

5.1 Aesthetics

A significant impact related to aesthetics would occur if the Alta Oceanside Project (proposed project) would:

- a) Have a substantial adverse effect on a scenic vista.
- b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- c) Substantially degrade the existing visual character or quality of 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.
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

a) *Would the project have a substantial adverse effect on a scenic vista?*

To determine which views are considered a scenic vista, a review of the applicable land use plans that identify scenic vistas was completed. This included a review of the General Plan and Local Coastal Plan, as discussed below.

General Plan

The City's General Plan Land Use Element states the policy goal of providing site design visually compatible with the surrounding open space environment when adjacent to scenic or recreational areas. The Environmental Resource Management Element (City of Oceanside 1986) provides the following table listing visual open space resources:

Table 5-1
Visual Open Space

Visual Resource	
Pacific Ocean	Cemetery
MCB Camp Pendleton	Utility Easement
San Luis Rey River	Buena Vista Lagoon
Mission San Luis Rey	Hosp Grove
Rosicrucian Fellowship	St. Charles Priory (Prince/Peace Abbey)
Cemetery	

Source: City of Oceanside 1986.

To define the existing visual quality of the project area, important views that include the project site have been identified as key vantage points (KVPs). KVPs consist of public viewpoints that would have views of the project site. KVPs were chosen considering the number of viewers, the duration of views, the visibility of the project site, and the location of designated scenic resources or vistas, as defined within adopted plans. Figure 5-1, Key View Map, illustrates the KVP locations. Each KVP shown in Figures 5-2 to 5-5 show the existing conditions view from the location, as well as the future view with the proposed project rendered into the photo. Each KVP is discussed below with a narrative description of each existing view as well as the view under the project conditions.

KVP 1: The first KVP is located along the southbound exit off of I-5 approximately 550 feet from the confluence with SR-76 and encompasses views looking southwest towards the project site (Figure 5-1). The view is characterized by mature landscaping, tall palms, and naturalized areas buffering the off-ramp from the commercial establishments along North Coast Highway. Features visible in the foreground include the City of Oceanside (City) monumental entry sign structure, In-n-Out building, signage, and surface parking with split-rail fence along the perimeter. In the background is the project site on which the Main Attraction and the vacant commercial structure are visible. Also in the background is the one and two-story Rodeway Inn which borders the project site on the north across existing Costa Pacifica Way. Beyond the project site, both the LaQuinta Inn and Best Western Inn are visible (Image A. Existing Conditions in Figure 5-2, View from I-5 Off-Ramp). With the implementation of the project, the background view of the site would change from the existing lower one-story buildings to the proposed taller five-story buildings (Image B. Proposed Project Conditions in Figure 5-2).

KVP 2: This KVP is located along the east side of North Coast Highway approximately 95 feet south of the project site and encompasses views looking northwest towards the project site (Figure 5-1). In the foreground is the existing three-story La Quinta Inn which is situated immediately south of the project site. This view of the project site shows street trees, the Main Attraction with associated landscaping, and the vacant commercial structure. In the background, the Rodeway Inn sign is visible and also the Marina Towers Condominiums in the distance (Image A. Existing Conditions in Figure 5-3, View from North Coast Highway). The project would continue this theme and include light, warm, neutral colors in keeping with the “California Coastal” style present in Oceanside and the surrounding neighborhood (Image B. Proposed Project Conditions in Figure 5-).

KVP 3: This KVP is located at the intersection of North Pacific Street and Breakwater Way, approximately 840 feet southwest of the project site and encompasses views looking northeast towards the project site (Figure 5-1). The view is characterized by streetscape features including street trees, sidewalks, curb cuts, and border landscaping. In the foreground is the existing four-story North Coast Village apartment complex with its formal landscape design including tall palms and understory plantings. East of North Pacific Street is a public surface parking lot with landscaping and split-rail fencing. In the background is the Amtrak Pacific Surfliner railroad track, San Luis Rey River Trail, and the existing single-story MiraMar mobile home community which is situated at the top of a steep embankment above the trail. The project site is located beyond the MiraMar mobile home community and is not visible in the existing conditions (Image A. Existing Conditions in Figure 5-4, View from Breakwater Way). With the completion of the project, the proposed five-story structure would be visible from this KVP on top of the hillside in the distant view (Image B. Proposed Project Conditions in Figure 5-4).

KVP 4: This KVP is located along the San Luis Rey River Trail approximately 750 feet from the I-5 overpass of the trail and encompasses views looking southeast towards the project site (Figure 5-1). The view is characterized by naturalized vegetation and buildings. In the foreground is the natural habitat conservation area along steep slopes within the river corridor. In the background to the left is the existing Rodeway Inn which shows 3-stories and exposed foundation. In the background to the right is the existing 5-story Seacliff condominium building. The project site is situated between the two buildings but no site features are visible under the existing conditions (Image A. Existing Conditions in Figure 5-5, View from San Luis Rey River Trail). With the completion of the project, the current space between the two existing developments would be visually filled in with the proposed five-story structure (Image B. Proposed Project Conditions in Figure 5-5).

Of the visual resources listed above, only the San Luis Rey River view is designated as a scenic resource and is potentially applicable to the project site. The site is not located within the public viewshed of the other identified visual open space areas. As shown in Figures 5-2 and 5-3, public views from locations to the east of the site looking west do not include views of the Pacific Ocean.

With the implementation of the project, the view from the San Luis Rey River Trail of scenic resources would be unaltered (Figure 5-4). Due to its location, the project would not block any views of the river, associated native habitat, the Pacific Ocean, or the harbor. The change in view would only occur in the background looking southeast from the trail, as shown in KVP4 (Figure 5-4). As shown in KVP4 the project site is situated between a three-story building to the north and a five-story building to the south and will serve to continue to urbanize the Downtown District as intended by the General Plan. As the project would be located in the already urbanized background of this view and would be of similar massing appearance, the project would not significantly degrade the view from this scenic vista. The project would have even less effect on the background of the public viewpoint locations further west of the site that may include the Pacific Ocean views due to the distance, topography, and intervening developments. Project impacts to scenic vistas per the General Plan would be **less than significant**.

Local Coastal Plan

The Local Coastal Plan (LCP) (City of Oceanside 1985) states the California Coastal Act policy goal which requires that “the visual qualities of the Coastal Zone shall be protected and that new development be sited and designed to be visually compatible with the character of surrounding areas”. The LCP finds that the Redevelopment Area LU-9 which includes the project site, has significant visual deterioration due to aging structures, conflicting architecture styles, lack of design standards, lack of maintenance, and lack of investment in the area. The LCP identifies the Pacific Ocean, San Luis Rey River, and the Oceanside Harbor as important natural aesthetic resources. The policy goals of the LCP applicable to the project site include designing to avoid disruption of natural land forms and significant vegetation, compatibility with surrounding neighborhood, streetscape enhancement, and priority on landscape design. It is noted that the General Plan and LCP policies that are relevant to the project and the project’s consistency with these policies are further discussed in Section 5.7, Land Use and Planning.

Of the visual resources listed in the LCP, the nearest view with the most potential for impact is the San Luis Rey River Trail view. The project would not degrade or restrict the view of the San Luis Rey River and only the background of the trail will be visually altered, as discussed above. As shown in KVP4 the project site is situated between two existing

three and five-story buildings, and the project would not block any views of scenic resources. There are no public views looking across the site towards these coastal resources due to the existing topography and intervening structures. As indicated above, the project would have even less effect on the background of the public viewpoint locations further west of the site that may include harbor and Pacific Ocean views due to the distance, topography, and intervening developments. Overall, the project would have a **less-than-significant impact** to scenic vistas protected by the LCP.

Given the proposed project's consistency with the applicable policies and no substantial adverse effect on a scenic vista, impacts would be **less than significant**.

b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

California's Scenic Highway Program was created by the Legislature in 1963. Its purpose is to preserve and protect scenic highway corridors from change, which would diminish the aesthetic value of lands adjacent to highways. A highway may be designated "scenic" depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. When a city or county nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway. The agency must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes. These ordinances make up the scenic protection program (Caltrans 2011).

The project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Interstate 5 (I-5) and SR-76 are eligible but not designated as State Scenic Highways. In addition, the previously disturbed project site with older non-descript buildings and typical ornamental landscaping does not include any scenic resources visible from the highway locations or otherwise. Please see Figure 5-2 for a view of the proposed project site from the I-5 off-ramp. Thus, the project would not damage scenic resources within a state scenic highway, and impacts would be **less than significant**.

- c) *In non-urbanized areas, would the project 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?*

General Plan

The General Plan Environmental Resource Management Element identifies the following objective relevant to scenic quality: Encourage the preservation of significant visual open spaces when such preservation is in the best interest of the public health, safety and welfare.” See Section 5.1(a) above for consistency with the General Plan scenic areas. As shown in Figures 5-2 to 5-5, the project would not substantially degrade the existing visual character or quality of public views of the site or its surroundings. The General Plan does not include other specific regulations governing scenic quality, except as described below under the Local Coastal Program. Thus, the project would have a **less-than-significant impact** related to the General Plan scenic quality guidance. Refer below for the project’s consistency with the Local Coastal Program regulations regarding scenic quality.

Local Coastal Program

The LCP Chapter VI. Visual Resources and Special Communities, Section C. lists a series of policies regarding visual preservation of scenic quality. Below are the policies applicable to the project. As described below, the project would be consistent with the Local Coastal Program policies regarding scenic quality and would therefore result in a **less-than-significant impact**.

Policy 3. All new development shall be designed in a manner which minimizes disruption of natural land forms and significant vegetation.

The project site is characterized as previously developed, disturbed land, is a generally level pad, and does not include any natural land forms. The plant communities or land cover types were identified within the project site: disturbed land, urban/developed, and non-native grassland: broadleaf-dominated. Such plant communities are not considered a significant habitat resource nor aesthetic resource by the adopted plans. Existing palms within the North Coast Highway street frontage are a component of those found along the length of North Coast Highway within the City, and will be retained or replaced with the proposed project to maintain this iconic streetscape element. Additionally, no special-status plant species were observed or are anticipated to occur. Refer to the Biological Technical Report (Appendix B) for more information. The project would be consistent with this policy as it does not result in the disruption of natural land forms or significant natural vegetation.

Policy 8. The City shall ensure that all new development is compatible in height, scale, color, and form with the surrounding neighborhood.

To address this policy, a key vantage point and massing analysis was completed. This analysis is illustrated in Figures 5-1 to 5-6. Below is an existing conditions discussion of the Key Vantage Points as well as an analysis of the project impact to those views relative.

Key Vantage Points

Visual sensitivity can be described as viewer awareness of visible changes in the environment and is based on a viewer's presence in public areas near a particular site. Sensitivity relates to the overall visual character of the area and visibility of the project site. To define the existing visual quality of the project area, important views that include the project site have been identified as key vantage points (KVPs). KVPs are public viewing areas and can include road viewsheds, public viewpoints, and other key views, as defined within adopted plans. Figure 5-1 illustrates the KVP locations.

Project Compatibility

Currently the site is developed with single-story structures. The proposed project is a five-story mixed-use building with a maximum height below that allowed by the zoning. The project height is visually comparable in height and scale to the adjacent five-story Seacliff condominium development, and other three-story neighboring hotels, as shown in KVPs (see Image B in Figures 5-2 to 5-5) and Figure 5-6, Massing Study. From a cumulative perspective, the adjacent Rodeway Inn is approved for redevelopment into a four-story hotel, there are four to five story residential and hotel buildings in the areas on both sides of the San Luis Rey River, and the project would also be visually consistent with the viewshed in the cumulative condition. Thus, the project would be compatible with the surrounding neighborhood building height and scale, and would not conflict with this policy.

The site is currently developed with neutral colored structures similar to the surrounding area (see Section 2.1.3 and Image A in Figures 5-2 to 5-5). The project would include light, warm, neutral colors in keeping with the "California Coastal" style present in Oceanside and the surrounding neighborhood (see Image B in Figures 5-2 to 5-5). The color scheme is similar in character and type to other buildings in the area including the Seacliff Condominiums and nearby hotels. Thus, the project would be compatible with the surrounding neighborhood color schemes and would not conflict with this policy.

Currently the site is partially developed with a commercial building, with single-story structures of varying style and unorganized site appearance (Figure 2-4, Site Photos). Refer to the KVP discussion above for a detail discussion of the existing site appearance as well as

Section 2.1.3, Existing Land Uses. The proposed change from this commercial site into a mixed-use residential development of similar style to the surroundings area would implement City goals for redevelopment in the Downtown District, and result in improved form compatibility with the surrounding neighborhood (see Image B in Figures 5-2 to 5-5). Thus, the project would improve the site compatibility with the surrounding neighborhood form, and would not conflict with this policy.

In conclusion, the project would be consistent with this policy.

Policy 9. In areas where a change to a more intensive use is proposed, adequate buffers or transition zones (such as increased setbacks, landscaped barriers, or decorative walls) shall be provided.

The project site is zoned Downtown District (D) Subdistrict 7(B) for which this use is permitted. The project would meet the frontage and side/corner setbacks, which consist of a 45-foot setback from North Coast Highway centerline and 10-foot setbacks from sides. The rear setback standards in Zoning Code Section 1232(I) include a 10-foot minimum set back as well as a provision that structures shall not intercept a 1:1 or 45-degree daylight plane inclined inward from a height of 12 feet. The project includes a Density Bonus incentive to eliminate the rear setback daylight plane provision, and this is incorporated as part of the project Mixed-Use Development Standards for the project. The daylight plane standard applies where commercial districts abut residentially designated properties. However, with the proposed project design, there would be residential uses adjacent to the residential boundary, and this would not be considered a change to a more intensive use. The project design also includes an increased minimum rear yard setback to 16 feet which would provide increased building separation as well as providing visual separations via perimeter landscaping and walls (see Section 3.3.1.4). These design features of the project would provide adequate buffers and would be consistent with this policy.

Policy 10. The City shall encourage consolidation of small, narrow frontage lots as a means of achieving better design.

The project proposes consolidation of five existing parcels, four of which front on North Coast Highway, with a cohesive design, in support of this policy objective. The project would be consistent with this policy

Policy 11. The City shall encourage variety, creativity, and site-responsive design for all new development.

The project proposes a mixed-use development with public amenities fronting North Coast Highway, including commercial uses and a plaza open to the public. A variety of amenities and open spaces for residents are included in and around courtyards centrally located within the site. Parking is within a garage “wrapped” by the building with limited garage entry visibility from public streets, or in a surface parking area at the rear of the site away from North Coast Highway with landscaping along the property boundary. Existing pedestrian and bicycle pathways to coastal areas are maintained with this development. The project design is oriented towards North Coast Highway and is intended to redevelop the partially developed commercial site consistent with the setting and the vision for the area (see Section 5.7, Land Use). Therefore, the project would be consistent with this policy.

Policy 13. New development shall utilize optimum landscaping.

The project proposes landscaping to accentuate the architecture, provides screening along property edges, shade the surface parking, and enhances the open spaces. An improved streetscape with wide sidewalks and street tree plantings provides a human-scale frontage to the project and meets the goals of the Coast Highway Corridor Study. The public entry plaza off of North Coast Highway would include landscaping with the intention of creating a pedestrian-oriented area. Plantings in the courtyards complement and enhance the architectural style. Water conserving landscaping and efficient irrigation design would be utilized, along with consideration of aesthetic and functional requirements for the site. All selected plant materials are California Invasive Plant Council (Cal-IPC) non-invasive. Refer to the project’s Landscape Plan (Figure 3-2, Landscape Plan) and Section 3.2.1.4 for additional details. The project would utilize optimum landscaping and would be, therefore, consistent with this policy.

City of Oceanside Zoning Ordinance

The project site falls within the Downtown District (DT), Subdistrict 7B, and is being developed in accordance with zoning regulations Section 1232(KK), which requires a Mixed-Use Development plan. Under Section 1232(KK) the base district regulations for residential and nonresidential land uses shall serve as the guideline for a mixed-use project. This plan allows a height limit of up to 65 feet in the 7B Subdistrict. In addition to compliance with the zoning height regulations, the project would be consistent with the site landscaping, and other building design measures that address scenic quality. Refer to the LCP Policy 9 discussion above regarding zoning setbacks. The project would not result in any zoning ordinance conflicts that would lead to significant scenic quality impacts, and therefore impacts would be **less than significant**.

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

The proposed project would not include large walls or expanses of glass or other highly reflective materials (see Image B in Figures 5-2 to 5-5). Therefore, the project would not create a source of substantial glare.

The project is in a built-up area where night lighting is a common feature. Light sources in the area include street lights, building lighting, security lighting, and sidewalk lighting. Outdoor lighting would be utilized as needed for parking areas, sidewalks, and security within the project site. Lighting would be placed along the vehicular surfaces, along the walkways and within the pool/recreation area, on walls of buildings. Lighting of the parking area would be properly shielded so as to prevent glare on any adjacent property. All outdoor lighting would be required to comply with Chapter 39 of the City Municipal Code, Light Pollution Regulations, which provides requirements to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research (City of Oceanside 2018). Through compliance with the municipal code, proposed outdoor lighting would not substantially affect day or nighttime views.

The project would not create a new source of substantial light or glare that would affect day or nighttime views, and therefore the impacts would be **less than significant**.

5.2 Agriculture and Forestry Resources

A significant impact related to agriculture and forestry resources would occur if the project would:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- d) Result in the loss of forest land or conversion of forest land to non-forest use.
- f) 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.

- a) *Would the project 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?*

The proposed project site does not include and is not adjacent to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2016). As such, the proposed project would have **no impact** to Farmland resources.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The proposed project site consists of 5.3-acres of developed and vacant land in the urbanized area of the City that is zoned for urban uses and is not used for agricultural purposes. According to the State Farmland Mapping and Monitoring Program, the site is designated as Urban and Built-Up Land (SDCIF 2016). In addition, the site is not subject to Williamson Act contract (DOC 2014). The proposed project would have **no impact**.

- c) *Would the project 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))?*

The project site does not contain any timber or forest resources, and does not meet the criteria for forest land or timberland. The project site is within the Downtown District (DT) zone, surrounded by residential and commercial uses, in an urban area that has no timberland zoning. Therefore, the proposed project would not conflict with existing zoning for forest land or timberland as those terms are defined by the significance threshold and would have **no impact** related to zoning conflicts.

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

See Section 5.2(c) above. The proposed project would have **no impact**, as no forest land is located on site or in the vicinity.

- e) ***Would the project 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?***

See Sections 5.2(a) through and 5.2(d) above. As no agricultural farmland or forest land resources are located on or in the vicinity of the site, and the project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use, the proposed project would have **no impact** related to the conversion of agricultural or forest land.

5.3 Energy

A significant impact related to energy would occur if the project would:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
 - b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- a) ***Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Implementation of the project would increase the demand for electricity and natural gas at the project site and gasoline consumption in the project area during construction and operations. Below is an analysis of whether the proposed would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Construction Use

As discussed in Chapter 3, the project would require an approximately 26-month-long construction period. The construction phases anticipated to occur include demolition, site preparation, grading, building construction, trenching, paving, and architectural coating. Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would trucks associated with vendor and haul trips.

The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. Natural gas is not anticipated to be required during construction of the project. Any minor amounts of natural gas that may be consumed as a result of proposed project construction would be temporary and negligible and would not be wasteful, inefficient, or unnecessary or have an adverse effect.

Heavy-duty construction equipment of various types would be used during each phase of construction. The CalEEMod analysis discussed in Appendix I to this EIR, includes the proposed construction schedule and assumed equipment usage. Based on that analysis, over all phases of construction, diesel-fueled, project site construction equipment would run for an estimated 52,320 hours, as summarized in Table 5-2.

Table 5-2
Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Demolition	2,304
Site Preparation	672
Grading	1,536
Trenching	1,680
Paving	4,608
Building Construction	40,800
Architectural Coating	720
Total	52,320

Source: Appendix I.

Fuel consumption from construction equipment was estimated based on the project's anticipated construction schedule by converting the total CO₂ emissions from each construction phase to gallons using conversion factors for CO₂ to gallons of diesel. Construction is estimated to occur over a 26-month period (2021-2023) based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2019). The estimated diesel fuel use from construction equipment is shown in Table 5-3.

Table 5-3
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Demolition	6	81.60	10.21	7,992.34
Site Preparation	7	20.06	10.21	1,964.88
Grading	8	65.39	10.21	6,404.89
Trenching	2	38.15	10.21	3,736.90
Paving	6	96.11	10.21	9,413.57
Building Construction	9	695.13	10.21	68,083.65
Architectural Coating	1	15.32	10.21	1,500.44
Total				99,096.67

Sources: Appendix I (pieces of equipment and equipment CO₂); The Climate Registry 2019 (kg/CO₂/gallon).
CO₂ = carbon dioxide; kg = kilogram; MT = metric ton

Fuel consumption from worker and vendor trips is estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are analyzed as being gasoline fueled, and vendor/hauling vehicles are analyzed as being diesel fueled. Calculations for total worker, vendor, and hauler fuel consumption are provided in Tables 5-4, 5-5, and 5-6.

Table 5-4
Construction Worker Vehicle Gasoline Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Demolition	720	2.52	8.78	287.23
Site Preparation	216	0.76	8.78	86.17
Grading	480	1.68	8.78	191.49
Trenching	1,440	5.04	8.78	574.46
Paving	1,440	5.04	8.78	574.46
Building Construction	246,600	836.44	8.78	95,266.63
Architectural Coating	9,840	32.22	8.78	3,669.64
Total				100,650.09

Sources: Appendix I (construction worker CO₂); The Climate Registry 2019 (kg/CO₂/gallon).

CO₂ = carbon dioxide; kg = kilogram; MT = metric ton

Table 5-5
Construction Vendor Truck Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg/CO ₂ /Gallon	Gallons
Demolition	0	0.00	10.21	0.00
Site Preparation	0	0.00	10.21	0.00
Grading	0	0.00	10.21	0.00
Trenching	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
Building Construction	63,600	824.41	10.21	80,745.30
Architectural Coating	0	0.00	10.21	0.00
Total				80,745.30

Sources: Appendix I (construction worker CO₂); The Climate Registry 2019 (kg/CO₂/gallon).

CO₂ = carbon dioxide; kg = kilogram; MT = metric ton

Table 5-6
Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Demolition	38	1.45	10.21	141.73
Site Preparation	0	0.00	10.21	0.00
Grading	1,338	50.95	10.21	4,990.45

Table 5-6
Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Trenching	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
Building Construction	2,778	104.23	10.21	10,208.37
Architectural Coating	0	0.00	10.21	0.00
Total				15,340.56

Sources: Appendix I (construction worker CO₂); The Climate Registry 2019 (kg/CO₂/gallon).
CO₂ = carbon dioxide; kg = kilogram; MT = metric ton

As shown in Tables 5-4 through 5-6, the project is estimated to consume 295,833 gallons of petroleum during the construction phase. By comparison, approximately 71.7 billion gallons of petroleum would be consumed in California over the course of the proposed project's construction period based on the California daily petroleum consumption estimate of approximately 52.9 million gallons per day (CEC 2016). Additionally, the proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which limits fuel use by restricting heavy-duty diesel vehicle idling time to 5 minutes. The project would not significantly affect the overall demand for petroleum considering the project's minimal contribution towards demand and compliance with CARB's Airborne Toxics Control Measure. Therefore, because petroleum use during construction of the proposed project would be temporary and minimal and would not be wasteful, inefficient, or result in the unnecessary consumption of energy resources, impacts would be **less than significant**.

Operational Use

Electricity

San Diego Gas & Electric (SDG&E) provides electric services to 3.6 million customers through 1.4 million electric meters and 873,000 natural gas meters throughout a 4,100-square-mile service area in San Diego and Southern Orange County (SDG&E 2016). According to the California Public Utilities Commission (CPUC), SDG&E consumed approximately 15,634 million kWh of electricity in total in 2018 (SDG&E 2019).

SDG&E receives electric power from a variety of sources. According to CPUC's 2016 Biennial Renewable Portfolio Standard (RPS) Program Update, 43.2% of SDG&E's power came from eligible renewable energy sources in 2016, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2017). This is an improvement from the 36.4% that SDG&E maintained in 2014 (CPUC 2016).

Based on recent energy supply and demand projections in California, statewide per capita consumption is expected to remain relatively constant at 7,200–7,800 kWh per person (CEC 2015). In the County, SDG&E reported an annual electrical consumption of approximately 15,634 million kWh in 2018, with 8,550 million kWh for non-residential use and 7,084 million kWh for residential use (SDG&E 2019). More specifically, within the City, annual electricity consumption (encompassing both residential and non-residential) is approximately 654,557,305 kWh in 2018 (SDG&E 2019).

CalEEMod estimates energy usage associated with building systems that are regulated under Title 24 (such as the heating and cooling system), lighting, and use of, appliances, plug-ins, and other sources not covered by Title 24. CalEEMod estimated that the project would consume 2,635,110 kWh of electricity annually. Compared with the City's annual electricity consumption, the anticipated increase in consumption associated with one year of project operation is approximately 0.40% of the City's use. Considering the project would be consistent with the City's General Plan and Zoning for the site, the local and regional electricity demand planning would have included the project. In addition, the project would comply with Title 24 energy efficiency standards, as well as would include energy efficiency measures (see Section 3.2.5). Overall, the project would not result in excessive electricity usage and project impacts would be **less than significant**.

Natural Gas

The CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. In 2012, California customers received 35% of their natural gas supply from basins located in the Southwest, 16% from Canada, 40% from the Rocky Mountains, and 9% from basins located within California (CPUC 2017). California gas utilities may soon also begin receiving biogas into their pipeline systems (CPUC 2017). SDG&E provides natural gas service to San Diego and Orange Counties. SDG&E is a wholesale customer of SoCalGas, and currently receives all of its natural gas from the SoCalGas system (CPUC 2017).

CalEEMod estimated that the project would consume 3.2 million thousand British thermal units (kBtu) of natural gas annually. By comparison, the City consumed approximately 4,877 million kBtu in 2018 (SDG&E 2019). The anticipated increase in consumption associated with one year of project operation is approximately 0.07% of the SDG&E existing demand. Considering the project would be consistent with the City's General Plan and Zoning for the site, the local and regional natural gas demand planning would have included the project. In addition, the project would comply with Title 24 energy efficiency standards, as well as would include energy efficiency measures (see Section 3.2.5). Overall, the project would not result in excessive natural gas usage and project impacts would be **less than significant**.

Petroleum

There are more than 35 million registered vehicles in California, and those vehicles consume an estimated 1.45 billion gallons of fuel each year (CEC 2019; DMV 2019). Petroleum currently accounts for approximately 92% of California's transportation energy consumption (CEC 2019). However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled (VMT). Market forces have driven the price of petroleum products steadily upward over time, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

Largely as a result of and in response to these multiple factors, gasoline consumption within the state has declined in recent years, and availability of other alternative fuels and energy sources has increased. The quantity, availability, and reliability of transportation energy resources have increased in recent years, and this trend may likely continue and accelerate (CEC 2019). Increasingly available and diversified transportation energy resources act to promote continuing reliable and affordable means to support vehicular transportation within the state.

As provided in the Traffic Impact Analysis (Appendix H), the project would generate approximately 2,495 daily vehicle trips during the week, including 10% reduction in vehicle trips from internal trip capture (i.e., trips from one on-site land use to another on-site land use). Using the CalEEMod default trip length and total VMT, the project would generate a total of 4,328,581 VMT annually. Similar to construction worker and vendor trips, fuel consumption was estimated by converting the total CO₂ emissions from each land use type to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, 92.5% of the fleet range from light-duty to medium-duty vehicles and motorcycles were assumed to run on gasoline. The remaining 7.5% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses/recreational vehicles, which were assumed to run on diesel.

Calculations for annual mobile-source fuel consumption are provided in Table 5-7.

Table 5-7
Mobile Source Fuel Consumption – Operation

Fuel	Vehicle MT CO ₂	kg CO ₂ /Gallon	Gallons
Gasoline	1,524.28	8.78	173,607.86
Diesel	123.92	10.21	12,137.42
Total			185,745.27

Sources: Appendix I (mobile source CO₂); The Climate Registry 2019 (kg/CO₂/gallon).
CO₂ = carbon dioxide; kg = kilogram; MT = metric ton

As shown in Table 5-7, mobile sources from the proposed project would result in approximately 173,608 gallons of gasoline per year and 12,137 gallons of diesel consumed per year beginning in 2024. By comparison, California as a whole consumed approximately 1.45 billion gallons of petroleum in 2018 (CEC 2019).

Over the lifetime of the project, the fuel efficiency of the vehicles being used by residents, visitors, and employees is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emissions vehicles in California (Appendix I). Additionally, the project would develop a mixed-use building that would include residential uses, commercial amenities, and the project's internal circulation features would provide residents the opportunity to access commercial uses via multiple modes of transportation and encourage non-vehicular modes of transportation through the inclusion of a walking and bicycling amenities connected with the existing network in the Downtown area.

In summary, although the project would increase petroleum use during operation, the use would be a small fraction of the statewide use and, due to efficiency increases, diminish over time. Additionally, the inclusion of on-site walking/bicycling network and other commercial amenities would help reduce petroleum-based fuels consumption. Given these considerations, petroleum consumption associated with the project would not be considered wasteful, inefficient, or unnecessary consumption of energy resources and impacts would **be less than significant**.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The project would meet the Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. Additionally, it is anticipated that operational vehicles would meet the applicable standards of Assembly Bill 1493 (vehicles manufactured in 2009 or later), and as a result, would likely consume less energy as fuel efficiency standards increase and vehicles are replaced. Natural gas and electricity are supplied to the project site by SDG&E. The proposed project would result in an increased use of natural gas and electricity during operation compared with the existing conditions. However, the project would result in a nominal increase in natural gas and electricity over the City's typical annual natural gas and electricity consumption.

Implementation of the project would not result in the reduction of substantial amounts of local or regional energy supplies compared to existing conditions. The resultant increase in energy demand would not exceed the available capacity of SDG&E servicing infrastructure to the site or beyond. Further, as substantiated in the calculations above, the increase in electricity and natural gas usage attributable to the proposed project falls within the current electricity and natural gas local demands. Considering the project would be consistent with the City's General Plan and Zoning for the site, the local and regional energy demand planning would have included the project. In addition, the project would comply with Title 24 energy efficiency standards, as well as would include energy efficiency measures (see Section 3.2.5). Regarding petroleum, fuel economy and use of alternative modes of transportation are expected to increase over time, and even without such reductions in future petroleum use, the petroleum use associated with the project would be negligible relative to current use and production. Therefore, impacts would be **less than significant**.

5.4 Greenhouse Gas Emissions

A significant impact related to greenhouse gas emissions would occur if the project would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The following analysis is based upon the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the proposed project by Dudek in June 2019 included as Appendix I to this EIR and other evidence in the project record.

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

The City has held public workshops on the City's General Plan Update, which includes development of a Climate Action Plan (CAP) and a policy framework to the Energy and Climate Action Element (E-CAP). The E-CAP proactively supports statewide efforts to cut GHG emissions by expanding local renewable energy generation, reducing energy use, promoting recycling and reuse, facilitating active transportation, and encouraging other sustainable practices. As part of this effort to ensure a sustainable future, the City prepared a GHG emissions inventory and a CAP, both of which inform the E-CAP. The City's Final CAP was adopted on May 8, 2019 (City of Oceanside 2019a). The City is currently in process of developing the CAP Consistency Checklist; thus, the City has established efficiency metric thresholds, which projects are to use to evaluate impacts from GHG emissions, in order to help the City to meet state reduction targets for 2020 and 2030. Projects are required to meet an efficiency metric threshold of 4.0 metric tons of carbon dioxide equivalent (MT CO₂e) per service population per year (MT CO₂e/SP/yr) for year 2020 and an efficiency metric threshold of 3.0 MT CO₂e/SP/yr for year 2030 (City of Oceanside 2019a). Projects that meet these thresholds would be considered consistent with the City's CAP. As there are no emissions, employment, or population data specific to the proposed project's build-out year (2024) in the CAP, an efficiency metric was generated for year 2024 by interpolating the efficiency metrics for years 2020 and 2030.

The calculated efficiency metric for 2024 was 3.6 MT CO₂e/SP/yr. If the project achieves the 2024 efficiency metric, the project would be consistent with the CAP and would not interfere with the state's ability to achieve the mid-term and long-term GHG reduction targets per Senate Bill 32 and Executive Order S-3-05.

Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. Total project-generated GHG emissions during construction were estimated to be 2,884 MT CO₂e, or 96 MT CO₂e per year when amortized over 30 years (Table 5-8).

Table 5-8
Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons			
2021	1,138.31	0.18	0.00	1,142.83
2022	1,291.69	0.14	0.00	1,295.08
2023	444.51	0.04	0.00	445.61
Total	2,874.51	0.36	0.00	2,883.52

Table 5-8
Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons</i>			
30-year Amortized Construction Emissions (MT CO₂e per year)				96.12

Source: Appendix I

The project would generate operational GHG emissions from area sources (landscape maintenance equipment), energy sources (natural gas and electricity consumption), mobile sources (vehicle trips), water supply and wastewater treatment, and solid waste. Estimated annual project-generated operational GHG emissions at full occupancy in 2024 plus amortized project construction emissions would be approximately 2,484 MT CO₂e per year (Table 5-9).

Table 5-9
Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>metric tons per year</i>			
Area	6.12	<0.01	<0.01	6.23
Energy	569.63	0.02	<0.01	572.19
Mobile	1,646.01	0.09	0.00	1,648.20
Solid waste	21.07	1.25	0.00	52.20
Water supply and wastewater	74.64	0.57	0.01	93.11
Operational Emissions				2,371.92
30-Year Amortized Construction Emissions				96.12
Operation plus Amortized Construction Total				2,468.04

Source: Appendix I

An efficiency metric approach, which is the basis for the GHG emission reduction targets established in the City's CAP (City of Oceanside 2019a), is appropriate for the project because it measures the project's emissions on a per-service population basis to determine its overall GHG efficiency relative to regulatory GHG reduction goals. As there are no emissions, employment, or population data specific to the project buildout year (2024), an efficiency metric was generated for year 2024 by interpolating the efficiency metrics for years 2020 and 2030. The 2024 efficiency metric was interpolated to be 3.6 MT CO₂e/SP/yr (see Section 3.4.1, Thresholds of Significance, in Appendix I, Air Quality and Greenhouse Gas Emissions Analysis Technical Report, for additional details).

Under the California Supreme Court's evaluation of the applicability of AB 32 the court identified the Numerical GHG Significance Threshold of "service population" as a potential option for lead agencies to evaluate GHG emissions. Refer to Appendix I for

additional information regarding AB 32 and “service population” information. The project’s service population, defined as the number of residents (866 persons) plus the number of jobs (25 persons) supported by the project, is 891 people. The project’s service population is based on City’s Housing Element, which estimates an average household size of 2.8 per dwelling unit (City of Oceanside 2013). Based on the service population (SP) of 891 people, the project would result in GHG emissions of approximately 2.97 MT CO₂e/SP/yr. Thus, the project’s estimated GHG emissions would not exceed the threshold of 3.6 MT CO₂e/SP/yr extrapolated from the City’s Climate Action Plan (City of Oceanside 2019a), and the project’s GHG emissions would be **less than significant**.

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

Consistency with SANDAG’S San Diego Forward: The Regional Plan

Regarding consistency with SANDAG’s Regional Plan, the project would be developed to support the policy objectives of the RTP and SB 375. More specifically, the project would develop a mixed-use community that would include residential and commercial uses. In addition, the project would include bike parking facilities and would include pedestrian improvements along the streetscape and a pedestrian crossing, which would promote walking and bicycle travel to the site. Refer to Appendix I Table 14 for the project’s consistency with the applicable goals. As no conflict would occur, the project would have a **less-than-significant impact**.

Consistency Analysis with City of Oceanside General Plan

The project also would be consistent with the goals set forth in the City’s General Plan Environmental Resource Management Element, Land Use Element, and Circulation Element that are designed to reduce the emissions of GHGs, reduce energy use in buildings and infrastructure, and promote the use of renewable energy sources, conservation, and other methods of efficiency. The project would provide road improvements, connections to bikeways, bicycle parking facilities, traffic calming measures, and sidewalks. Additionally, the project would provide accommodations for future solar PV systems and energy efficient appliances. Refer to Appendix I Table 15 for the project’s consistency with the applicable goals. As no conflict would occur, the project would have a **less-than-significant impact**.

Consistency Analysis with City of Oceanside’s Climate Action Plan

The City prepared a GHG emissions inventory and a CAP, both of which inform the E-CAP (City of Oceanside 2019a). The City’s Final CAP was adopted on May 8, 2019. The CAP demonstrates that, with implementation of applicable General Plan objectives and policies, coupled with state and federal actions and execution of CAP measures and actions,

the City will reduce GHG emissions in alignment with state goals established by Senate Bill 32 and maintain a trajectory to meet its proportional share of the 2050 state target identified in Executive Order S-3-05. Since the project would result in total GHG emissions that would not exceed the calculated efficiency metric threshold of 3.6 MT CO₂e/SP/yr for a build-out year of 2024, which was interpolated based on the CAP efficiency thresholds for years 2020 and 2030, the project would not conflict with the City's CAP.

Consistency with SB 32 and EO S-3-05

- **EO S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.
- **SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

The estimated annual project-generated GHG emissions would be approximately 2,372 MT CO₂e per year as a result of project operations only. Estimated annual project-generated operational emissions in 2024 plus amortized project construction emissions would be approximately 2,648 MT CO₂e per year. The project's service population, defined as the number of residents (866 persons) plus the number of jobs (25 persons) supported by the project, is 891 people. The project's service population is based City's Housing Element, which estimates an average household size of 2.8 per dwelling unit (City of Oceanside 2013). Based on the service population of 891 people, the project would result in GHG emissions of approximately 2.97 MT CO₂e/SP/yr. Thus, the project's estimated GHG emissions would not exceed 3.6 MT CO₂e/SP/yr, and the project's GHG emissions would be **less than significant**.

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would result in emissions less than the calculated efficiency metric (Refer to Appendix I Section 3.5.1). Therefore, the project would be consistent with SB 32 and EO S-3-05, and impacts related to GHG emissions would be **less than significant**.

5.5 Hazards and Hazardous Materials

A significant impact related to hazards and hazardous materials would occur if the project would:

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

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g) Expose people or structures, either directly or indirectly, to a significant risk or loss, injury or death involving wildland fires.

The following section is based upon the Phase I Environmental Site Assessment (Phase I ESA) and Limited Phase II Environmental Assessment (Limited Phase II ESA) prepared for the proposed project by Leighton and Associates, Inc. in August 2018 and other information in the project record. The Phase I ESA is based on a reconnaissance-level visit (August, 13 2018), records review, and interviews. The purpose of the Phase I ESA (Appendix J) was to identify, to the extent feasible and pursuant to the processes prescribed in ASTM International (ASTM) E1527-13, recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) in connection with the subject site. The Limited Phase II ESA is based on soil borings and samplings and related laboratory analysis. The reports are included as Appendices J and K to this EIR.

- a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Construction

Construction activities would entail routine transport of materials potentially hazardous to humans, wildlife, and sensitive environments. These materials include gasoline oil, solvents, cleaners, paint, and various other liquids and materials required for the operation of construction equipment. Direct impacts to human health and biological resources from accidental spills of small amounts of hazardous materials from construction equipment could potentially occur because of the proposed project. The Phase I and Phase II ESAs (Appendices J and K) also identified no known contaminated soils located on the property that would require transport, use or disposal.

Pursuant to construction activities involving potential hazardous materials, it is noted that the proposed project would comply with federal, state, and local health and safety requirements that are intended to minimize hazardous materials risk to the public, such as California Occupational Safety and Health Administration (Cal/OSHA) requirements, the Hazardous Waste Control Act, California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Additionally, standard best management practices included in the SWPPP required of the proposed project by the Construction General Permit (see Section 5.6, Hydrology and Water Quality), and associated hazardous materials handling protocols would be prepared and implemented to ensure the safe storage, handling, transport, use, and disposal of all hazardous materials during the construction phase of the proposed project. Thus, project construction impacts related to the routine transport, use, or disposal of hazardous materials would be **less than significant**.

Operations

Residential and retail uses are not typically associated with the transport, use, or disposal of hazardous materials. Household goods used by residential homes and/or retail spaces that contain toxic substances are usually low in concentration and small in amount. Therefore, there is no significant risk to humans or the environment from the use of such household goods. Residents and retail personnel are required to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility. Also, as of February 2006, fluorescent lamps, batteries, and mercury thermostats can no longer be disposed in the trash. Furthermore, the transport, use, and disposal of hazardous materials are fully regulated by the EPA, State of California, San Diego County, and/or the City. With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the project would be **less than significant**.

- b) *Would the project 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?***

Construction

Construction equipment that would be used to build the proposed project has the potential to release relatively small amounts of oils, greases, solvents, and other finishing materials through accidental spills. Spill or upset of these materials could have the potential to significantly impact surrounding land uses; however, federal, state, and local controls have been enacted to reduce the effects of such potential hazardous materials spills. The Oceanside Fire Department enforces city, state, and federal hazardous materials regulations

for the City. City regulations include spill mitigation, and containment and securing of hazardous materials containers to prevent spills. Compliance with these requirements is mandatory as standard permitting conditions, and would minimize the potential for the accidental release or upset of hazardous materials, thus ensuring public safety. Therefore, compliance with the above requirements such as Cal/OSHA requirements, the Hazardous Waste Control Act, CalARP Program, and the California Health and Safety Code would result in **less-than-significant** impacts with respect to the creation of significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operations

As stated above, residential and retail uses are not typically associated with the transport, use, or disposal of hazardous materials. Residents and retail personnel are required to dispose of household hazardous waste at a Household Hazardous Waste Collection Facility. In addition, operations would be required to comply with EPA, State of California, San Diego County, and/or the City regulations pertaining to household wastes. With mandatory regulatory compliance, potential hazardous materials accidental release impacts associated with long-term operation of the project would be **less than significant**.

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?***

The project site is not located within 0.25 mile of an existing or proposed school. Laurel Elementary School and Oceanside High School are within 0.75 mile located northeast and southeast of the proposed project location. As stated above, residential and retail uses are not typically associated with the transport, use, or disposal of hazardous materials. Construction activities would comply with the above requirements such as Cal/OSHA requirements, the Hazardous Waste Control Act, CalARP Program, and the California Health and Safety Code. Compliance with these requirements is mandatory and would minimize the potential for the accidental release of hazardous materials; therefore, impacts to schools would be **less than significant**.

- d) *Would the project be located on a site that 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?*

Phase I and Phase II ESAs (Appendix J and K) has revealed no evidence of recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) in connection with the property with the exception of the following:

- A gasoline service station was present in the eastern portion of the Site from 1945 to 1988, which is an HREC for the Site.
- Petroleum impacted soil was buried beneath the parking lot of the hotel adjacent to the south of the Site, therefore vapor encroachment is a REC for the Site.

Based on the findings of the Phase I ESA (Appendix J), a Limited Phase II ESA (Appendix K) was prepared to address potential petroleum soil vapor and lead concerns. The San Diego Department of Health (SDDEH) criterion used in this assessment is one in a million (1.0E-06). Non-carcinogenic toxicity is estimated by comparing the estimated dose to the dose required to trigger chronic toxicity. A value exceeding 1.0 is considered significant. The Phase II ESA analyzed soil vapor samples and the results indicate that the cumulative cancer risk is below the SDDEH criterion of 1.0E-06, and the total cumulative non-carcinogenic risk is less than the SDEH criterion of 1.0, therefore there is a low likelihood of carcinogenic and non-carcinogenic risk due to VOC vapors at the proposed residential development from the concentrations of chemicals detected during this investigation. The results of the vapor risk assessment determined that no significant cancer risks or non-cancer hazards are anticipated due to the concentrations of chemicals detected during this investigation..

According to the Phase I ESA, the project site was not identified on the “Cortese” Hazardous Waste and Substances Sites List (Cortese)/Historical Cortese (HIST Cortese) databases. As indicated above and detailed in the Phase I and Phase II ESAs (Appendix J and K), the site does not warrant listing. Therefore, **no impacts** would occur with implementation of the project.

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

The nearest airport are the Oceanside Municipal Airport, located approximately 1.7 miles northeast of the proposed project, and the McClellan-Palomar Airport, located approximately 7.2 miles southeast of the proposed project. The project is located outside of the safety zones for both airports (San Diego County Regional Airport Authority 2010).

The project is located within the southern corner of Review Area 2 for the Oceanside Municipal Airport (San Diego County Regional Airport Authority 2010). Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or notification overflight areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2 and the proposed building height does not conflict with these restrictions. As a new residential project in this area, an airport overflight notification would be required to be provided to future residents as part of standard City conditions. The project would be constructed in compliance with requirements of the Airport Land Use Commission for Oceanside Municipal Airport. Impacts related to an airport safety hazard or excessive airport noise would be **less than significant**.

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

The adopted emergency plans applicable to the project area consists of the Multi-Jurisdictional Hazard Mitigation Plan for San Diego County (County of San Diego 2018a) the San Diego County Emergency Operations Plan (County of San Diego 2018b) and the City's Emergency Plan (Oceanside Fire Department 2009). In addition, the City has developed a tsunami evacuation map (City of Oceanside n.d.a).

The Multi-hazard Mitigation Plan is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with State and Federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. The project would not impair inter-jurisdictional coordination and therefore would have **no impact**.

The 2016 Emergency Operations Plan was adopted by City Council on March 15, 2017. The City's Emergency Operations Plan describes a comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies and the private sector.

As discussed in Section 5.6 below, the coast of the City is within a tsunami inundation area. As a part of the City's Emergency Operations Plan, the City developed a tsunami evacuation map (City of Oceanside n.d.a) . This City map shows the project site located outside of the tsunami evacuation area for the City, but a portion of the adjacent MirMar mobile home community and Seacliff condominiums located within the evacuation area. Evacuation routes shown on the tsunami evacuation map (City of Oceanside n.d.a) in the project area include Pacific Street from Harbor Drive to Surfrider Way, Surfrider Way from Pacific Street to Horne Street, and North Coast Highway from Surfrider Way east. The project would not interfere with any evacuation routes identified on the tsunami evacuation map. While not designated as an evacuation route, Costa Pacifica Way is the only egress for the adjacent Seacliff development. As the project is not within the identified evacuation area and is located at a higher elevation than the adjacent area, the project site would not likely need to evacuate during a typical tsunami event. With the implementation of the project, Costa Pacifica Way would continue to serve as access for the Seacliff condominiums, and Seacliff could continue to use Costa Pacifica Way to North Coast Highway for egress during a tsunami event. The project would not interfere with tsunami evacuation from MirMar, as this community is provided egress via N. Cleveland Street to Surfrider Way. The project would not impede on implementation of this plan or the associated tsunami evacuation plan, and therefore would have **less than significant impact**.

The proposed project would provide three access points for emergency responders: one entrance from the north of the site via Costa Pacifica Way, one from the east of the site via North Coast Highway, and one from the south of the site via the proposed private drive (Figure 3-5). The proposed project would not require the full closure of any public or private streets or roadways during construction or operations, and would not impede access of emergency vehicles to the project or any surrounding areas. A Traffic Control Plan would be implemented during construction, as discussed in Section 3.2.5, Project Design Features. Further, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department, as detailed in Section 4.5, Transportation. The proposed project would not impair or physically impact any adopted emergency response plan or evacuation plan.

Overall, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be **less than significant**.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

According to the California Department of Forestry and Fire Protection's (CAL FIRE's) Very High Fire Hazard Severity Zones in LRA (Local Responsibility Area) map, the project site is

not located within or adjacent to a Very High Fire Hazard Severity Zone (CAL FIRE 2009). The project site is located within an urbanized and developed area of the City. The project site does not contain and is not adjacent to wildlands where there is risk for wildfire. Therefore, impacts would be **less than significant**.

5.6 Hydrology and Water Quality

A significant impact related to hazards and hazardous materials would occur if the project would:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- 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:
 - i. result in substantial erosion or siltation on or off site;
 - ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
 - iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - iv. impede or redirect flood flows.
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The following section is based upon the Storm Water Quality Management Plan (SWQMP) and Drainage Report prepared for the proposed project by Hunsaker and Associates in 2019. The SWQMP is based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). Storm water quality design was prepared in accordance with the City's Best Management Plan (BMP) Design Manual. The Drainage Study uses the Rational Method as described in the June 2003 San Diego County Hydrology Manual (SDCHM). The SWQMP and Drainage Report are included as Appendix L to this EIR.

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project is located within the San Luis Rey Hydrologic Unit (903), within the Lower San Luis Hydrologic Area (903.1) and the Mission Hydrologic Sub-Area (903.11) of the Water Quality Control Plan for the San Diego Basin (California Regional Water Quality Control Board 2016). Within this Hydrologic Sub-Area, downstream impaired 303(d) listed water bodies include the Pacific Ocean Shoreline, San Luis Rey River Mouth impaired by enterococcus, total coliform, indicator bacteria; and San Luis Rey River & Lower Stream impaired by chloride, enterococcus, fecal coliform, phosphorus, total dissolved solids, total nitrogen, toxicity, and indicator bacteria. Total Maximum Daily Loads (TMDLs) have been accordingly established to address these pollutants for these impaired water bodies. Considering the downstream waters are impaired by these pollutants, the potential pollutants of concern that may be generated by the project based on the proposed residential and commercial uses are sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides.

In accordance with regulations, a SWQMP has been prepared to address the project's operational impacts to water quality and the potential pollutants of concern. It is noted that hydromodification management requirements are not applicable to the project, as the project discharges runoff into a storm drain system that discharges into an exempt water body (San Luis Rey River). Per the SWQMP, the project source control measures would include storm drain inlet stenciling to indicate water flows into the ocean, garage drains plumbed into the sanitary sewer, Integrated Pest Management program to reduce pesticide use, fire sprinkler and rooftop equipment drainage to the sewer system, regular sweeping of the site. Treatment control BMPs including flow-thru planters and biofiltration at inlets will also be provided. The project would be required to provide for ongoing implementation and maintenance of these features in accordance with the SWQMP. Implementation of the SWQMP would reduce potential operational impacts related to water quality standards or waste discharge requirements to **less than significant** levels.

Construction activities associated with the proposed project could result in wind and water erosion of the disturbed area leading to sediment discharges. Fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact water quality. The proposed project is required to comply with the NPDES State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ for stormwater discharges and general construction activities, and incorporate standard BMPs such as regular cleaning or sweeping of construction areas and impervious areas, and runoff controls. In compliance with the Construction General Permit [Order 2009-0009-DWQ](#), a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that specifies BMPs that would be implemented during

construction to minimize impacts to water quality. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. Therefore, construction impacts related to water quality standards or waste discharge requirements would be **less than significant**.

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?*

The proposed project would not use groundwater during construction or operation. According to the Geotechnical Update Report (Appendix E), no groundwater was encountered during the field exploration and it is assumed that the groundwater depth is greater than 20 feet below the ground surface. Although the proposed project would result in a change in amount of impervious groundcover on the project site, the proposed project would include pervious features that include planter islands, landscaping throughout the site, and water quality basins. Per the Geotechnical Update Report (Appendix E), infiltration BMPs could create adverse groundwater conditions and, as such, none are proposed with this project. Due to the depth of groundwater and the proposed type of construction, project is not anticipated to decrease groundwater supplies or interfere with groundwater recharge in a manner that would impede sustainable groundwater management. Project impacts related to groundwater recharge would be **less than significant**.

c) *Would the project 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:*

i) *result in substantial erosion or siltation on or off site;*

During construction, the project has potential to result in exposed soils or changes in runoff that could result in erosion or siltation. This potential impact would be avoided through the implementation of BMPs during construction in accordance with a SWPPP, as required by City regulations in conformance with the NPDES State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ (As amended by 2010-0014-DWQ and 2012-0006-DWQ). As the project is over one acre in size, the project would be required to prepare a SWPPP and comply with the associated BMPs. Construction BMPs would include measures such as minimizing exposed soils, street sweeping, utilizing hydroseed to stabilize soils, and using sandbags, check dams or berms during rain events to direct flows. Surface drainage would be controlled at all times in accordance with NPDES regulations, and potential construction impacts related to soil erosion and siltation would be **less than significant**.

During operations of the project, the site surfaces would be covered by pavement or landscaping. The proposed building would have a drainage system to collect roof runoff. Positive surface drainage would be provided to direct surface water away from the structure toward the street or suitable drainage facilities. Planters would be designed with provisions for drainage to the storm drain system. All surface runoff would be controlled in a manner to avoid erosion and sedimentation in accordance with regulations and the prepared SWQMP (Appendix L). Therefore no substantial erosion or siltation on or off site would be produced. Impacts would be **less than significant**.

- ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;*

Existing Conditions

The existing drainage patterns across the project site generally divide the site into three drainage areas: northern, central and southwestern (Figure 5-7, Existing Drainage Areas). The existing site drainage patterns consist generally of surface flows from east to west. (Figure 5-8, Proposed Drainage Areas)

The northerly drainage area drains east to west from North Coast Highway to the westerly project boundary, where it is intercepted by a drainage channel that directs runoff northerly into an existing storm drain lateral that connects to the backbone storm drain system in Costa Pacifica Way.

The central drainage area drains east to west through the project site, but discharges to the adjacent mobile home park overland. After storm flows traverse the mobile home park, runoff is intercepted by a drainage channel and catch basin prior to entering the Seacliff project, and is routed through the Seacliff storm drain laterals to the backbone storm drain system.

The southwesterly drainage area drains southwest through the mobile home park via overland flow. This area drains around the Seacliff project and drains to the San Luis Rey River north of the project.

The project area adjacent to North Coast Highway drains into an inlet near the south east corner of the project boundary and through an existing storm drain which discharges to San Luis Rey River.

Proposed Conditions

In the proposed condition, the project would collect and treat all runoff prior to discharging from the site in accordance with stormwater regulations. Flows from Costa Pacifica Way and adjacent project areas and also flows from on-site drainage would be collected at the existing backbone system in Costa Pacifica Way (Figure 5-8, Proposed Drainage Areas).

Although this proposed diversion increases the drainage area to the backbone system in Costa Pacifica Way, the hydrology shows no increase in peak runoff, achieved by inclusion of the proposed attenuation vault that reduces peak runoff flow rates from this facility to approximately 1 cfs. The vault detains runoff from the southwestern portion of the site, releasing that volume of water slowly and at a time much later in the storm event, such that the downstream detention basin has had opportunity to manage the peak flows prior to receiving runoff from the southwestern portion of this site. (Appendix L).

Due to the designed drainage systems, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site and the impact would be **less than significant**.

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

The proposed storm drain system is designed to safely convey the peak 100-year storm drain to the existing system in Costa Pacifica Way. The existing system has sufficient conveyance capacity to accept the proposed runoff from the site that will be reduced by the proposed storm water detention vault. There would be no adverse impact from the proposed development on the existing retention basin, as there would be an overall reduction in peak flow rates. Onsite detention of storm water volume from the south portion of the developed site in a detention vault releases that volume of water slowly and at a time much later in the storm event, such that the downstream detention basin has had opportunity to manage peak flow prior to receiving runoff from the south portion of this site. The site and downstream properties would not be adversely impacted during the 100-year storm event due to reduction in peak runoff and overland flow in comparison to the existing conditions. Existing inlets along North Coast Highway would not experience an increase in runoff in the proposed condition, as there would be no increase in existing impervious area draining to them. (Refer to Appendix L for more information)

Additionally, the SWQMP designs stormwater quality measures to remove pollutants from runoff in compliance with the City BMP Manual.

Therefore, the project would not contribute runoff which would exceed the capacity nor would it provide additional sources of polluted runoff. Project impacts would be **less than significant**.

iv) impede or redirect flood flows?

The project proposes to divert runoff away from the mobile home park, routing of all runoff to the north into the existing backbone storm drain system in Costa Pacifica Way. Although this proposed diversion increases the drainage area to the backbone system in Costa Pacifica Way, there would be an overall decrease in peak runoff in the post development condition into the existing detention basin. There is an increase in peak flow rates in the upper portion of the existing system that has excess capacity for conveying stormwater. All runoff would eventually reach the San Luis Rey River as in the existing condition. Overall, re-routing this flow would not result in a physical flooding impact or exacerbation of an existing flooding issue. The site is not located within a flood zone (see below) and proposed changes in runoff would not affect any downstream flood zones. Refer to Appendix L for additional information. Project impacts would not 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 impede or redirect flood flows and impacts would be **less than significant**.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

According to the FEMA Flood Insurance Rate Map (FIRM) for this site, the project is located in an unshaded Zone X, which is defined as “Areas determined to be outside the 500-year floodplain (Appendix L). The site is not located within proximity to a water body that could pose a seiche hazard to the project considering its elevation and distance relative to the San Luis Rey River. According to the Tsunami Inundation Map for Emergency Planning Oceanside Quadrangle the property is not located within the inundation area (CalEMA 2009). In addition, it is noted that the nearby Seacliff development to the west and the adjacent MirMar mobile home community are also outside the tsunami inundation area. The tsunami inundation area is limited to the San Luis Rey River corridor and generally the area west of S. Pacific Street. Refer to Sections 5.12(d) for information regarding tsunami evacuation information, which is noted to address a different area than the tsunami inundation area. Consequently, significant impacts related to the release of pollutants due to project inundation would not occur. Project impacts related to the potential release of pollutants due to project inundation would be **less than significant**.

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

The San Diego Basin Plan, most recently amended on May 17, 2016, sets forth water quality objectives for Region 9. Specifically, the Basin Plan is designed to accomplish the following: (1) designate beneficial uses for surface and groundwater, (2) set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, (3) describe mitigation measures to protect the beneficial uses of all waters within the region, and (4) describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan. The Basin Plan incorporates by reference all applicable SWRCB and the San Diego RWQCB (San Diego Water Board) plans and policies.

The project site is located within the San Luis Rey Watershed Water Quality Improvement Plan (WQIP) area. The ultimate goal of the WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies (City of Oceanside et al. 2016). These improvements in water quality would be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within the watershed and implements strategies to address them. The project is consistent with these goals by complying with the regulations as described below.

The Sustainable Groundwater Management Act has enacted sustainable groundwater management requirements. In San Diego County, there are four basins that meet the criteria as medium-priority and are subject to this regulation: Borrego Valley, San Diego River Valley, San Luis Rey Valley and San Pasqual Valley. While the site is located near the San Luis Rey River corridor, the project does not fall within the area of the San Luis Rey Valley that is considered a medium-priority basin category that requires a Groundwater Sustainability Plan (California Department of Water Resources 2019). Currently there is no adopted sustainable groundwater management plan applicable to the project area. In addition, the project would not utilize or affect the groundwater levels or quality, as discussed above. Thus, the project would not conflict with a sustainable groundwater management plan.

The SWQMP was prepared based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The storm water quality design was prepared in accordance with the City's Best Management Plan (BMP) Design Manual as well. The Drainage Study included in the SWQMP uses the Rational Method as described in the June 2003 San Diego County Hydrology Manual (SDCHM). The project would include appropriate BMPs to reduce water quality pollutant impacts of concern during

operations in accordance with the Water Quality Control Plan for the San Diego Basin (see Section 5.5(a)). The project would also be required to adhere to a SWPPP during construction, which would satisfy the requirements set forth by NPDES State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ. Overall, the project would comply the Water Quality Control Plan for the San Diego Basin and impacts would be **less than significant**.

5.7 Land Use and Planning

A significant impact related to land use would occur if the project would:

- a) Physically divide an established community.
- 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.

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

The project is an infill development in an established urban area. The project site is along North Coast Highway to the west of Interstate I-5 and State Route 76 in an area with a mix of commercial, visitor serving, hospitality and residential and recreational uses. There is no established community to, and the project does not divide an established community. Therefore the impact would be **less than significant**.

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?*

The project is subject to several local and regional plans intended to avoid environmental effects. Such local plans include the City General Plan, Oceanside Subarea Plan of the North County Multiple Habitat Conservation Plan (MHCP), City's Local Coastal Program (LCP), and Coast Highway Vision and Strategic Plan and the Coast Highway Corridor Study. The applicable regional plans include San Diego Forward: The Regional Plan, Regional Air Quality Plan, San Luis Rey Watershed Water Quality Improvement Plan. Overall, the project would not 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 and the project would have a **less-than-significant impact**. Refer to the analysis below for additional consistency determination information.

Local Plans

General Plan

As discussed in Section 2.3.1, the City's General Plan, the project site as well as the immediately surrounding areas has a General Plan land use designation of Downtown District (DT) with a sub-area Coastal Zone designation.

The City's Zoning Ordinance Article 12 outlines the requirements of the (D) Downtown District; Subdistrict 7(B). As presented in Section 1210 of the Zoning Ordinance, the specific purposes of the Downtown District are as follows:

- To promote the long-term viability of and rejuvenation of the Redevelopment Project Area and to protect and enhance primarily boating and water-dependent activities; and secondarily other public-oriented recreation uses in the Oceanside Small Craft Harbor
- Maintain and enhance an appropriate mix of uses; and
- Provide land-use controls and development criteria consistent with the General Plan, the Redevelopment Plan, and the LCP.
- The specific purpose of Subdistrict 7(B) is: To provide for a mix of recreational and commercial uses conveniently located near recreational and residential areas. Residential uses are allowed as part of a mixed use project.

The proposed project meets these goals by providing redevelopment and enhancement of an existing commercial property with a mix of residential and commercial uses.

In addition, the project site is located within the Special Management Area Redevelopment Project Area (as defined by Figure LU-9 of the City's General Plan). The stated objective of the Redevelopment Project Area is to promote the long-term viability and rejuvenation of the redevelopment area consistent with the overall policies and improvements of the City. As mentioned above, the project meets this goal by redeveloping and enhancing an aging commercially developed property.

Circulation Element

Per the City's General Plan Circulation Element (City of Oceanside 2012a):

“...Any proposed development project that affects a street segment that already operates, or is projected to operate worse than LOS D, regardless of peak hour analysis, the developer shall propose, prepare and provide mitigation measure(s) for the City to review. If there are no feasible mitigation measures that would fully mitigate traffic impacts, the developer shall propose, prepare and provide various

mitigation measures, such as Traffic Management Center tools and resources, which may not include physical improvements to the impacted facility. Where various mitigation measures have been prepared, agreed upon by the City, and will be implemented, yet are not sufficient to fully mitigate the traffic impacts, then LOS E during peak hour periods will be considered acceptable.”

The proposed project has incorporated mitigation in accordance with the General Plan Circulation Element, as detailed in EIR Section 3.2.3, Circulation, Access, and Parking. These measures are detailed in Section 4.5. With the inclusion of this mitigation, the project would be consistent with this General Plan Circulation Element. Impacts would be **less than significant**.

Environmental Resource Management Element

The Environmental Resource Management Element outlines objectives for the following; Water; Soil, Erosion and Drainage; Coastal Preservation; Minerals; Vegetation and Wildlife Habitats; Air Quality; Agricultural Resources; Cultural Sites; and Recreation and Scenic Areas. The objectives applicable to the project site are listed below:

Water

The proposed project would receive water service from the City. The existing infrastructure is adequate to serve the project and no offsite improvements would be necessary. Refer to Section 5.13, Utilities and Service Systems, for more detail. Stormwater runoff and pollution control is provided by complying with the Regional Water Quality Control Board’s National Pollutant Discharge Elimination System MS4 Permit, the SWPPP, and the City’s BMP Design Manual as described in Section 5.6, Hydrology and Water Quality. Regarding flood prone areas, according to the FEMA Flood Insurance Rate Map (FIRM) for this site, the project is located in an unshaded Zone X, which is defined as “Areas determined to be outside the 500-year floodplain (Appendix L). Thus, the project would not conflict with the Environmental Resource Management Element water-related objectives.

Soil, Erosion and Drainage

Soil, Erosion and Drainage impacts would be avoided or minimized by adherence to the erosion control standards established by the City’s Grading Ordinance and through implementation of best management practices required by the SWPPP and associated NPDES regulations. Thus, the project would not conflict with the Environmental Resource Management Element soil, erosion or drainage objectives.

Vegetation and Wildlife Habitats

No special-status plant or wildlife habitats were detected on the project site during biological surveys. Mitigation for impacts to non-native grassland and nesting birds are outlined in Section 4.1.5. The project would be consistent with the Environmental Resource Management Element vegetation and wildlife habitat-related objectives.

Cultural Sites

As discussed in Section 4.2 Cultural Resources, one prehistoric isolated resource (Isolate AO-Iso-001) was located on the project site during the archaeological field survey conducted on January 24, 2019. Due to the overgrown vegetation and the ground-disturbing construction activities that would take place, there is a potential to uncover more surface or sub-surface resources within the project site. The project would provide mitigation to reduce this potential impact consistent with the Environmental Resource Management Element objective regarding cultural sites. Overall, the project would be consistent with the Environmental Resource Management Element cultural sites objective.

Recreation and Scenic Areas

As discussed in Section 3.2.1.3, Recreational Amenities and Open Space, the proposed project would provide a fitness center connecting to the fitness courtyard. Approximately 30% of the project site is planned as open space. Common open space is proposed, consisting of courtyards, a roof deck, and non-street side yards. Each dwelling unit with a private balcony or patio counts as open space. Overall, there would be a total of approximately 66,000-square feet of open space, or 213-square feet of open space per dwelling unit. This would satisfy the City's open space requirements of 200-square feet per unit, and the project is not anticipated to result in an adverse effect to parkland that would necessitate the construction or expansion of additional parks.

As shown in Section 5.1 Aesthetics, the only scenic vista defined as a visual resource in the General Plan is the San Luis Rey River. The project will have no adverse effect on views of the river corridor as shown in the key vantage point Figures 5-2 to 5-5. Overall, the project would be consistent with the Environmental Resource Management Element recreation and scenic area objectives.

In conclusion, the proposed project would not result in a conflict with the Environmental Resource Management Element of the General Plan that would lead to a physical environmental impact, and therefore project impacts would be **less than significant**.

Oceanside Subarea Plan of the North County (MHCP)

The Oceanside Subarea Plan (City of Oceanside 2010) of the MHCP addresses how the City of Oceanside, California, would conserve natural biotic communities and sensitive plant and wildlife species pursuant to the California Natural Community Conservation Planning (NCCP) Act of 1991 and the California and U.S. Endangered Species Acts (CESA and ESA). Please refer to Section 4.1, Biological Resources, for more information regarding project consistency with this plan. In summary, the proposed project would be consistent with the biological resource avoidance and mitigation requirements set forth by this plan and would not result in a conflict with the Oceanside Subarea Plan.

City of Oceanside Local Coastal Program

The site is located within the Coastal Zone and is subject to the City's LCP (City of Oceanside 1985). The objective of the Coastal Zone is to provide for the conservation of the City's coastal resources and fulfill the requirements of the LCP and the California Coastal Act of 1976 by ensuring that new development does not interfere with the public right of access to and along the shoreline. The LCP has a series of policies, which are each discussed further below.

Coastal Access

The Coastal Act requires that development not interfere with public right of access to and along the shoreline. The proposed project does not impact the existing public use easement existing on the project site providing access to the San Luis Rey River Trail. The project does not propose any other access improvements that would interfere with coastal access. Thus, the project would not conflict with this policy.

Recreation and Visitor Serving Facilities

The Coastal Act requires adequate distribution of public facilities such as parking areas, visitor facilities, protection of oceanfront, granting of priority to commercial recreation uses, reservation of upland areas to support coastal recreation, and distribution of visitor facilities throughout the coastal zone. The proposed project is a private development on private property and is not required to provide public facilities such as parking areas, visitor facilities, protection of oceanfront, granting of priority to commercial recreation uses, reservation of upland areas to support coastal recreation, and visitor facilities.

Approximately 30% of the project site is planned as open space. A total of approximately 42,900 square-feet of common open space is proposed, consisting of courtyards, a roof deck, and non-street side yards. The project would also provide adequate parking on site for the proposed uses (Section 3.2.3). Thus, the project would not conflict with this policy.

Water and Marine Resources; Diking, Dredging, Filling, and Shoreline Structures; and Hazard Areas

The Coastal Act requires maintenance, protection and restoration of marine resources and coastal water quality, as well as control of discharges and run-off into the ocean and coastal wetlands. The project does not propose any direct changes to water and marine resources, and the proposed project would not significantly alter topography or otherwise result in a potential for erosion. The site is also not located within a flood area. As described in Section 5.6, the project would have a less than significant indirect impact to downstream water quality and hydrology. Thus, the project would not conflict with this policy.

San Luis Rey River Specific Plan

The project is not located within this specific plan area. Thus, the project would not conflict with this policy.

Environmentally Sensitive Habitat Areas

The Coastal Act requires that environmentally sensitive habitat areas be protected against significant disruption. Development adjacent to such habitats shall be sited and designed to prevent adverse environmental impacts. No plant or animal species listed as rare, threatened, or endangered were detected on the project site. Mitigation for impacts to non-native grassland: broadleaf-dominated and nesting birds is provided, consistent with this policy. Refer to Section 4.1, Biological Resources, for additional details. Thus, the project would not conflict with this policy.

Visual Resources and Special Communities

The Coastal Act requires that the visual qualities of the Coastal Zone shall be protected and that new development be sited and designed to be visually compatible with the character of the surrounding areas. As detailed in Section 5.1, Aesthetics, the project would not block any public scenic views of the ocean or other scenic resources such as the San Luis Rey River corridor or Harbor. Changes to the San Luis Rey River trail scenic views as a result of the project would be minimal considering the views of the scenic resources would not be affected and the project would visually infill in the urbanized area. The project would also be consistent visually with the surrounding area in mass and style. Refer to Section 5.1 for additional details. The project would not conflict with this policy.

Coast Highway Vision and Strategic Plan and the Coast Highway Corridor Study

The project site is located within the Coast Highway Vision and Strategic Plan (The Vision Plan); (City of Oceanside 2009), an advisory document for development which is intended to revitalize and enhance the Coast Highway Corridor. The plan's objectives are to promote the Oceanside identity, promote smart growth, encourage regulatory flexibility, promote high quality design, and the preservation of historical resources.

The Vision Plan makes recommendations and provides design guidelines in order to create a place that is:

- Human-scaled and pedestrian-oriented
- Diverse in its options for housing, recreation, transportation, and employment
- Mixed-use
- Full of vibrant and unique public spaces that are truly “Oceanside”
- In harmony with the natural environment
- Focus on the long-term economic viability of the community

The Coast Highway Corridor Study (City of Oceanside 2019b) is an effort by the City to begin the design process for the street enhancements recommended in the above mentioned Coast Highway and Strategic Plan. The goals of the plan are:

1. Improving pedestrian and bicycle infrastructure with a focus on safety and comfort.
2. Enhancing access to transit
3. Modifying the roadway with improvements such as roundabouts to improve traffic flow.
4. Improving parking access to businesses along with corridor
5. Encouraging economic development through improvements in mobility and the public streetscape.

The proposed project meets the goals of these two documents by providing the development type, scale, and features as recommended. These plans envision the site being redeveloped. The project provides redevelopment of the site into a mix of commercial and residential uses, and would include pedestrian friendly streetscape improvements, affordable housing, and activates the streetscape with retail frontage and a public plaza. The project also proposes architectural treatments in harmony with the community. The project would also provide a Continental crosswalk consistent with the Coast Highway Corridor Study. Overall, the project would not conflict with the Coast Highway Corridor Study and project impacts would be **less than significant**.

Regional Plans

San Diego Forward: The Regional Plan

The project site is located within the San Diego Forward: The Regional Plan which is focused on improving the transportation system for the future of San Diego. These initiatives are addressed in more depth in Sections 4.7, Air Quality, and 5.4, Greenhouse Gas Emissions. In summary, the proposed project is consistent with the applicable objectives by protecting open space, creating a mix of uses, encouraging multi-modal transportation, and promoting sustainable resources.

Regional Air Quality Plan

The project site is located within the San Diego Air Pollution Control District. Please refer to Section 4.7, Air Quality, for more information. In summary, the proposed project is consistent with this land use plan, as the project is consistent with the land use assumptions utilized to prepare the regional RAQs, and the project emissions would not exceed the SDAPCD thresholds.

San Luis Rey Watershed Water Quality Improvement Plan

The project site is located within the San Luis Rey Watershed Water Quality Improvement Plan (WQIP) area. The ultimate goal of the WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies. These improvements in water quality would be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within the watershed and implements strategies to address them. The Storm Water Quality Management Plan (SWQMP) was prepared for the proposed project based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The storm water design was prepared in accordance with the City's Best Management Plan (BMP) Design Manual. The Drainage Study included in the SWQMP uses the Rational Method as described in the June 2003 San Diego County Hydrology Manual (SDCHM). Please refer to Section 5.6, Hydrology and Water Quality for more information. In summary, the proposed project is meeting these goals by complying with all local and regional water quality programs and policies that are intended to reduce water pollutants and control runoff in a manner to avoid impacts to downstream waters. Thus, the project would not conflict with this plan.

5.8 Mineral Resources

A significant impact related to mineral resources would occur if the project would:

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

As mandated by the Surface Mining and Reclamation Act (SMARA) of 1975, the California State Mining and Geology Board classifies the state's mineral resources with the Mineral Resource Zone (MRZ) system. This system includes identification of presence/absence conditions for meaningful sand and gravel deposits. The project site is within MRZ-3, areas containing mineral deposits, the significance of which cannot be evaluated from available data.

According to the City's General Plan – Land Use Element, the proposed project is not within a designated mineral resource area (City of Oceanside 1989) and therefore would not 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. Thus, the proposed project would have **no impact** on mineral resources.

- 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?***

See answer to Section 5.8(a). The proposed project would have no impact, as the proposed project is not within a designated mineral resource area (City of Oceanside 1989) and would not 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.

5.9 Population and Housing

A significant impact related to population and housing would occur if the project would:

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

The proposed project is located within the City of Oceanside (see Figure 2-1, Project Location). As shown in Table 5-10, the City is projected to grow by 14,000 residents between 2020 and 2030. (SANDAG 2019). For this same period, the City is estimated to increase the number of housing units by 4,871.

Table 5-10
Oceanside Regional Growth Forecast

Factors	Years				
	2010	2020	2030	2040	2050
Population	167,086**	195,592	209,613	214,530	217,108
Housing	64,759	69,630	73,499	73,557	73,551
Jobs*	—	48,464	54,597	60,377	67,550

Source: SANDAG 2019.

* includes military/**based on 2010 U.S. Census

The Housing Needs Assessment section of the Housing Element of Oceanside's General Plan indicates that the City is in need of 775 extremely-low-income (ELI) housing (City of Oceanside 2013). Under the current State density bonus law (SB 1818 of 2005), cities and counties must provide a density increase of up to 35% over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with units affordable to very low-, low- or moderate-income households (City of Oceanside 2013).

Prior to the density bonus, the proposed project could have a density of 29-43 dwelling units per acre. After the density bonus, the proposed project would construct 309 units, resulting in a residential density of 58.2 dwelling units per acre. Under Chapter 14C of the

Oceanside City Code, the calculations for the number of reserved affordable units shall be made without including any increase in the allowable number of housing units (City of Oceanside 2000). The proposed project would propose 26 units to be very low income affordable units, and therefore would be in compliance with the City's municipal code and would help meet the City's affordable housing needs.

The proposed project would construct 309 units, which would have the potential to house approximately 891 people, based on the City's Housing Element of an average household size of 2.8 per dwelling unit (City of Oceanside 2013) and information from the applicant, which states that the project would employ 25 persons. The City has identified the site for redevelopment within its General Plan as well as the Coast Highway Vision and Strategic Plan. The proposed redevelopment with 309 residential units (including 26 affordable units) as well as commercial uses would be in line with these plans. Further, the proposed project contribution towards growth would be consistent with the SANDAG growth projections, as well as the City's in RHNA goals. Thus, the proposed project would lead to additional growth within the City, but the proposed growth is consistent with the growth planned for the City. The project would not lead to indirect growth, as the project would not provide for additional infrastructure improvements that would allow for additional unplanned growth in the area. It is noted that the surrounding area is also identified for redevelopment per the General Plan and Coast Highway Vision and Strategic Plan, and redevelopment of the surrounding area is currently planned for. Therefore, the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly, and would have a **less-than-significant** impact.

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

The project site does not currently include existing housing that would be displaced and the project would not displace people. Therefore, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and the proposed project would cause a **less-than-significant** impact.

5.10 Public Services

A significant impact related to public services would occur if the project would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order

to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- Fire Protection
- Police Protection
- Schools
- Parks
- Other public facilities

- 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?

The Oceanside Fire Department (OFD) operates eight firehouses and serves approximately 180,000 residents across 41 square miles (City of Oceanside n.d.b). OFD employs 35 daily on-duty operations staffing comprising of 18 firefighters, eight engineers, eight captains, and one battalion chief. Staffing in administration, training, and prevention departments include eight staff captains, one investigator, zero to four part-time inspectors, one emergency medical services manager, six full-time support staff, and zero to four part-time daily support staff. Lifeguard staffing includes a daily full-time captain, lieutenant, and sergeant (four to seven) and two to 20 daily seasonal or part-time personnel (Lawrence, pers. comm. 2019).

The OFD operates eight fire stations. The locations and apparatus for the fire stations are shown in Table 5-11. Each fire station is operational 24 hours a day, 365 days a year.

Table 5-11
Fire Stations in the City of Oceanside

Station Name	Address	Apparatus*
Fire Station 1	714 Pier View Way	• 6 Fire engines • 1 Quint Ladder Truck • 1 Tiller Truck • 5 Ambulances • 3 Brush Engines • 1 Water Tender • 1 Command Vehicle (Battalion Chief)
Fire Station 2	1740 South Ditmar Street	
Fire Station 3	3101 Oceanside Boulevard	
Fire Station 4	3990 Lake Boulevard	
Fire Station 5	4841 North River Road	
Fire Station 6	895 North Santa Fe Avenue	
Fire Station 7	3350 Mission Avenue	

Table 5-11
Fire Stations in the City of Oceanside

Station Name	Address	Apparatus*
Fire Station 8	1835 Avenida Del Oro, Suite F	• 1 Command & Interoperability Trailer • 1 Incident Support Trailer • 1 Mass Casualty Response Vehicle • 1 Confined Space Trailer • 1 Courier Truck

Source: City of Oceanside n.d.b

OFD utilizes a dynamic distribution system that chooses units based on which OFD unit is closest at the time the alarm is received. Fire Station 1 responds to the majority of calls for service in the vicinity of the project site (approximately 70% last year), and when Station 1 is unavailable, units identified for response to the site could come from multiple stations. The second most frequent response to the project site area comes from Fire Station 7, which responded to approximately 14% of calls for service in the project site area last year. Table 5-12 depicts the 2018-2019 response history by fire station to the block range contiguous to the project site.

Table 5-12
Fire Station Percentage of Responses to the Project Site (2018–2019)

Assigned Station	% of Responses to Fire	% of Responses for Emergency Medical Services (EMS)
Fire Station 1	69.7%	69.4%
Fire Station 2	6.1%	2.0%
Fire Station 3	6.1%	8.2%
Fire Station 7	13.6%	14.3%
Other Fire Station	4.5%	4.5%

Source: Lawrence, pers. comm. 2019

According to the City’s General Plan – Community Facilities Element, the City strives to achieve a 5 minute response time from fire stations to all developed areas within the City. (City of Oceanside 1990). The same General Plan policy indicates that the City strives to provide “a maximum response time for paramedic units of eight (8) minutes in urban areas.” (City of Oceanside 1990). OFD’s goal for fire and emergency services is to achieve a 5-minute response time for the first arriving units 90% of the time. ((Lawrence, pers. comm. 2019).

The OFD is currently experiencing a very high response workload¹ of approximately 3,300 responses per year for Station 1. (Lawrence, pers. comm. 2019). Based on 115 previous

¹ A very high workload is defined as 3,000 to 3,999 responses per year in which overlapping calls occur daily, usually during peak demand periods, and working incidents are frequent.

responses to the vicinity of the project for Fiscal Year 2018-2019 for both fire and emergency medical services to the project vicinity, the 90th percentile response to the block range contiguous to the project site is 6 minutes and 49 seconds. Consistent with the General Plan policy, EMS services 90th percentile response to the block range contiguous to the project site area is 6 minutes and 55 seconds. The only fire incident in the project vicinity in the last Fiscal Year had a response time of 5 minutes and 18 seconds (Lawrence, pers. comm. 2019).

Independent of the Project, the City initiated an effort to relocate Fire Station 1 in order to provide a larger and newer station to meet the needs of the City. The City purchased the planned Fire Station 1 relocation site at an existing, developed site located at 602 Civic Center Drive in 2004. The City's Fiscal Year 2019-20 Capital Improvement Program (CIP) includes a budget to fund the design for the relocated Fire Station 1, and the City Staff Report dated September 11, 2019 indicates the City is proceeding with the design phase (City of Oceanside 2018, 2019c). Per the 2019-20 CIP (City of Oceanside 2019c), construction of the relocated station is anticipated to occur from 2020 to 2022. While full funding for construction has not yet been included in the CIP, this station is planned to be operational regardless of whether the project proceeds.

The proposed project would increase the amount of development in the downtown area, with a corresponding increase in demand for services in combination with other recent development west of I-5, consistent with what is already contemplated in the General Plan and in the City's emergency services planning. Refer to EIR Section 6.4.15 for the cumulative analysis of public services. As indicated above and addressed further in EIR Section 6.4.15, the City has an established public facility development impact fee program (Municipal Code Chapter 32B and 32C) that requires new development to provide funds towards capital improvements for public services including fire and emergency services. The project would be required to pay those developer impact fees in accordance with the City's requirements.

The proposed project would not 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 fire protection and would, therefore, have a **less-than-significant impact**.

Police protection?

The Oceanside Police Department (OPD) employs 227 sworn and 83 non-sworn positions who handle approximately 110,000 calls for service each year (Armijo, pers. comm. 2019). The OPD

has an additional 23 hourly, non-sworn positions (Armijo, pers. comm. 2019). OPD operates two police resource centers: Police Beach Facility on 122 North The Strand, and the Downtown Resource Center on 401 Mission Avenue #C-122. The primary station that would serve the proposed project site is located at 3855 Mission Avenue, which is located approximately 4.4 miles northeast of the project site (Armijo, pers. comm. 2019).

According to the City’s General Plan – Community Facilities Element, OPD shall strive to provide a maximum response time of five minutes for all Priority E and I emergency service calls (City of Oceanside 1990). Table 5-13 indicates that the OPD has been meeting these response time goals.

Table 5-13
Oceanside Police Department Response Times

Call Priority	Average Response Time Goals	Actual Average Response Times
Priority E – Imminent threat to life	Within 5 minutes	3 minutes, 45 seconds
Priority 1 – Serious crimes in progress	Within 5 minutes	3 Minutes, 45 seconds
Priority 2 – Less serious crimes with no threat to life	Within 10 minutes	8 Minutes, 40 seconds
Priority 3 – Minor crimes/requests that are not urgent	Within 60 minutes	17 Minutes, 20 seconds
Priority 4 – Minor requests for police services	Within 60 minutes	17 Minutes, 20 seconds

Source: Armijo, pers. comm. 2019; Stauffer, pers. comm. 2019

As discussed in Section 5.9, Population and Housing, the proposed project would have the potential to house an estimated 866 people. OPD acknowledged that an increased staffing ratio of 1.3 sworn members per thousand residents and 0.6 non-sworn members per thousand residents would be needed to maintain the current response time averages seen in Table 5-13 (Armijo, pers. comm. 2019). Without the corresponding increase in staff, response times would likely increase but the proposed project would not negatively impact OPD’s ability to provide adequate services as their response time would still be within the response time goal thresholds (Armijo, pers. comm. 2019).

The closest resource center to the project is the Downtown Resource Center, which is located approximately 0.6 mile southeast of the project site and is a three minute drive. The proposed project would in accordance with OPD’s response time goals and would not require the construction or expansion of a new facility (Armijo, pers. comm. 2019; Stauffer, pers. comm. 2019). In addition, the project would provide payment of development impact fees in accordance with Municipal Code Sections 32B and 32C that is intended to address the need for additional public services generated by new development (see Section 6.4.15). The proposed project would not 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 police protection and would, therefore, have a **less-than-significant impact**.

Schools?

The proposed project would be served by the Oceanside Unified School District (OUSD). OUSD serves 18,071 students and operates 23 schools, including 16 elementary schools, four middle schools, two comprehensive high schools, and one alternative high school (OUSD n.d.). Potential students living within the proposed project development would be serviced by the schools listed in Table 5-14. As stated in Chapter 1, Project Description, the proposed project would be completed in 2023. The projected enrollments with development growth for the 2023 to 2024 school year for Laurel Elementary School, Lincoln Middle School, and Oceanside High School are 438, 619, and 1,809 respectively (OUSD 2017a). The estimated enrollment with the potential students are listed in Table 5-13 and would not exceed capacity of the schools. The schools would be able to service the students generated from the project and would not require new or expanded facilities. The proposed project would not 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 schools. Therefore, the proposed project would have a **less-than-significant impact**.

Table 5-13
School Enrollment and Capacity

School	Address	Estimated Capacity	2016–2017 Enrollment	2017–2018 Enrollment
<i>Elementary</i>				
Laurel	1410 Laurel Street	744	445	441
<i>Middle</i>				
Lincoln	2000 California Street	1038	836	857
<i>High</i>				
Oceanside	1 Pirates Cove Way	2654	2,213	2,189

Source: OUSD 2017a, 2017b, 2017c, 2018a, 2018b, 2018c, 2018d.

Parks?

According to the City's General Plan – Community Facilities Element, the City's goal is to provide a minimum of five acres of developed "community parks" per 1,000 residents within the City (City of Oceanside 1990). Based on these goals, the City would need to provide approximately 894.4-acres of public park land for their residents. As discussed further in Section 5.11, the City has 937.52-acres of park land.

The proposed project would provide adequate on site usable open space, and would be in compliance with the City's goal. The proposed project would provide a minimum of 200 square-feet of usable open space on site per residential unit in compliance with the City's Municipal Code, Chapter 32D. The project would provide payment of park fees, as applicable (City of Oceanside 2019d). Overall, adequate parkland would be available to service the project on site and City-wide, and no deterioration of existing facilities is anticipated.

The proposed project would not 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 parks and would, therefore, have a **less-than-significant impact**.

Other Public Facilities?

The City operates two public library locations: the Civic Center Library on 330 North Coast Highway, and Oceanside Public Library Mission Branch on 3861 Mission Avenue (City of Oceanside n.d.c). According to the City's General Plan – Community Facilities Element, library facilities should have a floor area of 0.55 square feet per resident, accessibility for all Oceanside residents within 10 minutes in driving time or two miles in distance (whichever is greater), a ratio of three public library staff (consisting of one librarian plus two clerical staff) per 6,000 residents of the City, and a ratio of Oceanside library inventory of three items per resident (City of Oceanside 1990). Based on these requirements, the current City population of 178,021, and the potential for the project to bring in approximately 866 people as discussed in Section 5.9, Population and Housing, library facilities should be approximately 98,387 square feet in total, 90 public library staff, and 536,658 items in their inventory. The Civic Center Library is approximately 0.5 mile, or a two minute drive, southeast of the project site, thus in accordance with the City's General Plan policy.

However, recent trends in library budget cuts often prevent libraries from meeting goals set forth in General Plans or Master Plans. As is the case with the Oceanside Public Library, existing conditions dictate that it does not meet the thresholds defined in the City's General Plan. The Oceanside Public Library has a combined square footage of 42,000 square feet,

has 38 full time equivalent employees, and 195,061 items in inventory (Cosby, pers. comm. 2019). These conditions were not caused nor and would not be significantly exacerbated by the proposed project. Oceanside Public Library Director, Sherri Cosby, indicated that the proposed project would affect library services but there would be no adverse impact. Additionally, Sherri Cosby indicated that there are plans for a proposed library facility. The proposed library facility was planned and approved prior to the planning of the proposed project. None-the-less, the project would provide payment of development impact fees in accordance with Municipal Code Sections 32B and 32C that is intended to address the need for additional public services generated by new development (see Section 6.4.15).

The proposed project would not 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 library facilities and would, therefore, have a **less-than-significant impact**.

5.11 Recreation

A significant impact related to recreation would occur if the project would:

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

The City is currently in the process of updating their Parks and Recreation Master Plan, which was last adopted in January 1996. Based on the City's Park Overview, the City has one 75-acre regional park, 22 community parks consisting of 375.96-acres, 10 special use parks and facilities consisting of 245.50-acres, 17 neighborhood parks/pocket parks consisting of 80.46-acres, and 160.60-acres of joint open space from 27 schools. The total acreage of park land in the City is 937.52-acres. Additionally, the San Luis Rey River Trail is located adjacent to the project to the north. The trail runs 7.2 miles adjacent to the San Luis Rey River with 10 access points for pedestrians and cyclists. The trail leads to beach access approximately 1/3 mile to the west of the project site.

In accordance with the City's Municipal Code, Chapter 32D, the proposed project is required to either 1) create dedicated park land within or partly within the project site, whose acreage would be determined by the City, 2) dedicate land usable for recreation purposes in addition to paying a portion of the park impact fee, or 3) pay the entire park impact fee (City of Oceanside n.d.d). The proposed project would provide a minimum of 200 square-feet of usable open space on site per residential unit in compliance with this City code. The project would provide payment of park fees, as applicable (City of Oceanside 2019d).

According to the City's General Plan – Community Facilities Element, the City's goal is to provide a minimum of five acres of developed "community parks" per 1,000 residents within the City (City of Oceanside 1990). Based on these goals, the City would need to provide approximately 894.4-acres of public park land for their residents. As discussed above, the City has 937.52-acres of park land. The proposed project would provide adequate on site usable open space, and would be in compliance with the City's goal.

The project would potentially increase the utilization of the pedestrian access to the west and the San Luis Rey River Trail. However, this trail is paved and additional usage is not anticipated to result in any deterioration of this trail.

Overall, adequate parkland would be available to service the project on site and City-wide, and no deterioration of existing facilities is anticipated. Therefore, the proposed project would have a **less-than-significant impact**.

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?*

As discussed in Section 3.2.1.3, Recreational Amenities and Open Space, the proposed project would provide a 2,309-square foot fitness center connecting to the fitness courtyard. Approximately 30% of the project site is planned as open space. A total of 42,907 square-feet of common open space is proposed, consisting of courtyards, a roof deck, and non-street side yards. Each dwelling unit with a private balcony or patio counts as open space, thus provided another 22,822 square-feet of open space. Overall, there would be a total of 65,729-square feet of open space, or 213-square feet of open space per dwelling unit. This would satisfy the City's open space requirements, and the project is not anticipated to result in an adverse effect to parkland that would necessitate the construction or expansion of additional parks. The proposed project would have a **less-than-significant impact**.

5.12 Utilities and Service Systems

A significant impact related to utilities and service systems would occur if the project would:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- c) Result in a determination by the wastewater treatment 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.
- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The information provided in this analysis is taken from the following report(s):

Public Sewer System Analysis for the Alta Oceanside Project in the City of Oceanside; prepared by Dexter Wilson Engineering. Provided as Appendix M in this EIR.

Water System Analysis for the Alta Oceanside Project in the City of Oceanside; prepared by Dexter Wilson Engineering. Provided as Appendix N in this EIR.

- a) ***Would the project 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?***

Water

Water service to the proposed project would be from the City's Talone 320 Pressure Zone. The nearest public water lines are a 12-inch water line in North Coast Highway and an eight-inch water line in Coast Pacifica Way. The water supply comes from the five million gallon Wire Mountain Reservoir, the three million gallon Fire Mountain Reservoir, and the three million gallon John Paul Steiger Reservoir. The existing public water system provides the necessary flow and pressure for the proposed private fire protection system. No offsite water system improvements are needed to provide service to the project, and the improvements within the proposed project site would be constructed in accordance with the City's design guidelines. Therefore, the proposed project would have a **less-than-significant impact**.

Wastewater Treatment

The proposed project would receive sewer service from the City. As discussed in Section 3.2.4, Public Utilities, the residential units would connect to an existing 8-inch gravity main as well as construct a lift station located within the southern parking lot. According to Appendix M, the estimated average sewer flow of the proposed project would be 48,618 gpd with a projected peak flow of 194,472 gpd (135 gpm). The City's Water, Sewer, and Reclaimed Water Design & Construction Manual (City of Oceanside 2017) indicates that 10-inch or less sewer lines shall have a maximum depth of flow of half the diameter, and sewer lines 12 inches or larger shall have a maximum depth of flow of two-thirds of the diameter. The maximum depth-to-diameter (d/D) ratio downstream of the Alta Oceanside project is 0.33 under existing peak flow conditions. This occurs in an 8-inch sewer reach in North Coast Highway (Manhole 12 to Manhole 10 on Exhibit A). With the proposed sewer line upgrade and the proposed project generation, the d/D would be 0.38 and would be less than the City's d/D 0.67 standard. Downstream of this sewer reach, the maximum d/D does not exceed the City's of Oceanside design criteria. Thus, no additional sewer line upgrades would be required to service the project.

The City is served by the San Luis Rey Wastewater Treatment Plan (SLRWWTP) and the La Salina Wastewater Treatment Plant (LSWWTP) (City of Oceanside n.d.e, n.d.f). The SLRWWTP is a secondary wastewater treatment plant that serves areas of the City east of I-5, treats wastewater from the Rainbow MWD and a portion of the City of Vista. The LSWWTP is also a secondary wastewater treatment plant that historically treats wastewater from areas west of I-5, downtown and along the coast. However, the City is in the process of decommissioning the LSWWTP and would augment flows to the SLRWWTP (City of Oceanside 2015). Both plants discharge treated effluent through the Oceanside Ocean Outfall (City of Oceanside n.d.e). The SLRWWTP's capacity for secondary treatment is 15.4 million gallons per day (MGD), and its capacity for tertiary treatment is 0.7 MGD (City of Oceanside 2016).

Based on the available capacity of the system with the proposed improvements, the facilities and infrastructure serving the proposed project would be able to handle the projected flow rates. Therefore, no additional sewer improvements would be necessary to service the proposed project and impacts would be **less than significant**.

Storm Water Drainage

As discussed in Section 5.6, Hydrology and Water Quality, the existing system would have sufficient conveyance capacity to accept the proposed runoff from the proposed project site. Therefore, the proposed project would have a **less-than-significant impact**.

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?

Water service to the proposed project would be from the City's Talone 320 Pressure Zone. The nearest public water lines are a 12-inch water line in North Coast Highway and an eight inch water line in Coast Pacifica Way. The water supply comes from the five million gallon Wire Mountain Reservoir, the three million gallon Fire Mountain Reservoir, and the three million gallon John Paul Steiger Reservoir. The existing public water system provides the necessary flow and pressure for the proposed private fire protection system.

Citywide water supply planning is completed via the 2015 Urban Water Management Plan (City of Oceanside 2016). The proposed project would be in compliance with the General Plan and Zoning code, and therefore water demand of the project has been already planned for in the City and Regional water supply documents that are based on the buildout of the City (see Section 5.9, Population and Housing). The City has also developed the Oceanside Water Conservation Master Plan (City of Oceanside 2015), with an update completed in 2015 that further ensures water availability to the City during drought years. Additionally, the project would include water conserving landscaping along with efficient irrigation design consistent with the City's water planning efforts.

The City primarily receives water from the San Diego County Water Authority (SDCWA). The SDCWA has developed a Water Shortage Contingency Plan (SDCWA 2017) as well that identifies ways in which the region can reduce water consumption during catastrophic events and in drought years. As part of the Water Shortage Contingency Plan, the Drought Ordinance established four drought stages of actions that can be taken to reduce water demand up to 40% or more. Because the occupants of the project would be a customer within the City's service area, the project would likely have to adhere to any extraordinary conservation measures imposed by the City.

Overall, water supply impacts would be **less than significant** considering the local and regional water supply planning efforts and the project's consistency with the assumptions utilized in those plans.

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?

See answer to Section 5.13(a) and (b). The proposed project would be in compliance with the General Plan and Zoning code, and therefore wastewater demand of the project has been already planned for in the City's wastewater system plans that are based on the buildout of the City. The proposed project would not result in the need for additional capacity and would have a less-than-significant impact.

d) *Would the project 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?*

The project site would be provided solid waste disposal services by Waste Management as with the rest of the City. The solid waste collected from the City is now disposed of at the El Sobrante Landfill located in Corona, California. The El Sobrante Landfill has a maximum permitted throughput of 16,054 tons per day with estimated remaining capacity of 145,530,000 tons and projected closure date of January 1, 2045 (CalRecycle 2018). The Greenhouse Gas Emissions Analysis prepared by Dudek (Appendix I) estimated that the proposed project would generate approximately 71.07 tons of solid waste per year from the residences and 32.73 tons per year from proposed commercial uses, which equates to approximately 0.28 tons of solid waste per day (Appendix I). This represents 0.00017% of the daily landfill capacity. Therefore, the El Sobrante Landfill has sufficient permitted capacity remaining to serve the proposed project. Additionally, the proposed project would participate in the City's recycling programs, which would further reduce solid waste sent to El Sobrante Landfill.

The City's goal is to achieve a 75 to 90% diversion/recycling rate by 2020 based on their Complete Zero Waste Plan (City of Oceanside 2012b). This plan includes a program for expanded residential and commercial composting, which the project would be consistent with. The project would also provide compost and recycling bins for residents and tenants in accordance with this plan. Demolition and construction waste would be recycled as feasible, also in accordance with this plan. As the project would not impair the attainment of solid waste reduction goals, project impacts would be **less than significant**.

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

The proposed project would be in compliance with state policies like the California Solid Waste Reuse and Recycling Access Act of 1991 and Assembly Bill 341 (Solid Waste Diversion). Section 3.2.5, Project Design Features, includes recycling bins for residential and commercial tenants, as well as compost bins. Refer to Section 5.13(d) for additional details. Therefore, the proposed project would be consistent with regulations related to solid waste, and would have a **less-than-significant impact**.

5.13 Wildfire

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

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
 - c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
 - d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.
- a) ***Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

The proposed project is not located within a state responsibility area or lands classified as very high fire hazard severity zones (VHFHSZ). The proposed project site is located approximately 1.5 miles southwest from a VHFHSZ (City of Oceanside 1975). As discussed in Section 5.5(f) and 5.11(d), the project would not conflict with the regional or city emergency response plans, and the site would have adequate emergency access. Refer to Section 5.5(f) and 4.5 for additional information. The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan and, therefore, would have a **less-than-significant impact**.

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

See answer to Section 5.14(a). The proposed project site is located in a highly urbanized and developed area that's relatively flat, and is not located within or adjacent to a fire hazard severity zone. The site is located near the San Luis Rey River corridor that includes native vegetation that could experience a relatively small-scale wildfire risk. However, the project would not exacerbate that risk. The project would be in compliance with Fire Code and development would be adjacent to other existing developments away from this river corridor area. In addition, adequate emergency egress would be provided and the City and County has adequately planned for wildfire hazards (see Section 5.5(f)). The proposed project would not exacerbate wildfire risks, exposing occupants to pollutants and, therefore, would have a **less-than-significant impact**.

- c) *Would the project 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?*

See answer to Section 5.14(a). While the proposed project would require the installation of water sources and other underground utilities (see Section 5.13, Utilities and Service Systems), these would not exacerbate fire risks because the proposed project is not located with or adjacent to a fire hazard severity zone and these improvements would be constructed within an existing roadway and project site. The proposed project would not require the installation or maintenance of infrastructure which would exacerbate fire risk and, therefore, would have a **less-than-significant impact**.

- d) *Would the project 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?*

See answer to Section 5.14(a). The project is not located in a VHFHSZ and risk if wildfire is considered low in the nearby San Luis Rey River corridor due the relative size of the upland habitat area and location. Due to the site location uphill relative to the river corridor, the project would not be subject to downhill flooding or landslides resulting from a fire in the river corridor. The Geotechnical Report and response letter (Appendices E and F) also do not note any significant landslide risks based on the soil types. The project would not 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. Therefore, impacts would be **less than significant**.

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SOURCE: SANGIS 2017

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A. Existing Conditions



B. Proposed Project Conditions

SOURCE: Renderholic, 2019

DUDEK

FIGURE 5-2
View from I-5 Off-Ramp
Alta Oceanside Project

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A. Existing Conditions



B. Proposed Project Conditions

SOURCE: Renderholic, 2019

DUDEK

FIGURE 5-3
View from North Coast Highway
Alta Oceanside Project

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A. Existing Conditions



B. Proposed Project Conditions

SOURCE: Renderholic, 2019

DUDEK

FIGURE 5-4
View from Breakwater Way
Alta Oceanside Project

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A. Existing Conditions



B. Proposed Project Conditions

Path: Z:\projects\alta\alta\project\11488000\A\POC

SOURCE: Renderholic, 2019

DUDEK

FIGURE 5-5

View from San Luis Rey River Trail

Alta Oceanside Project

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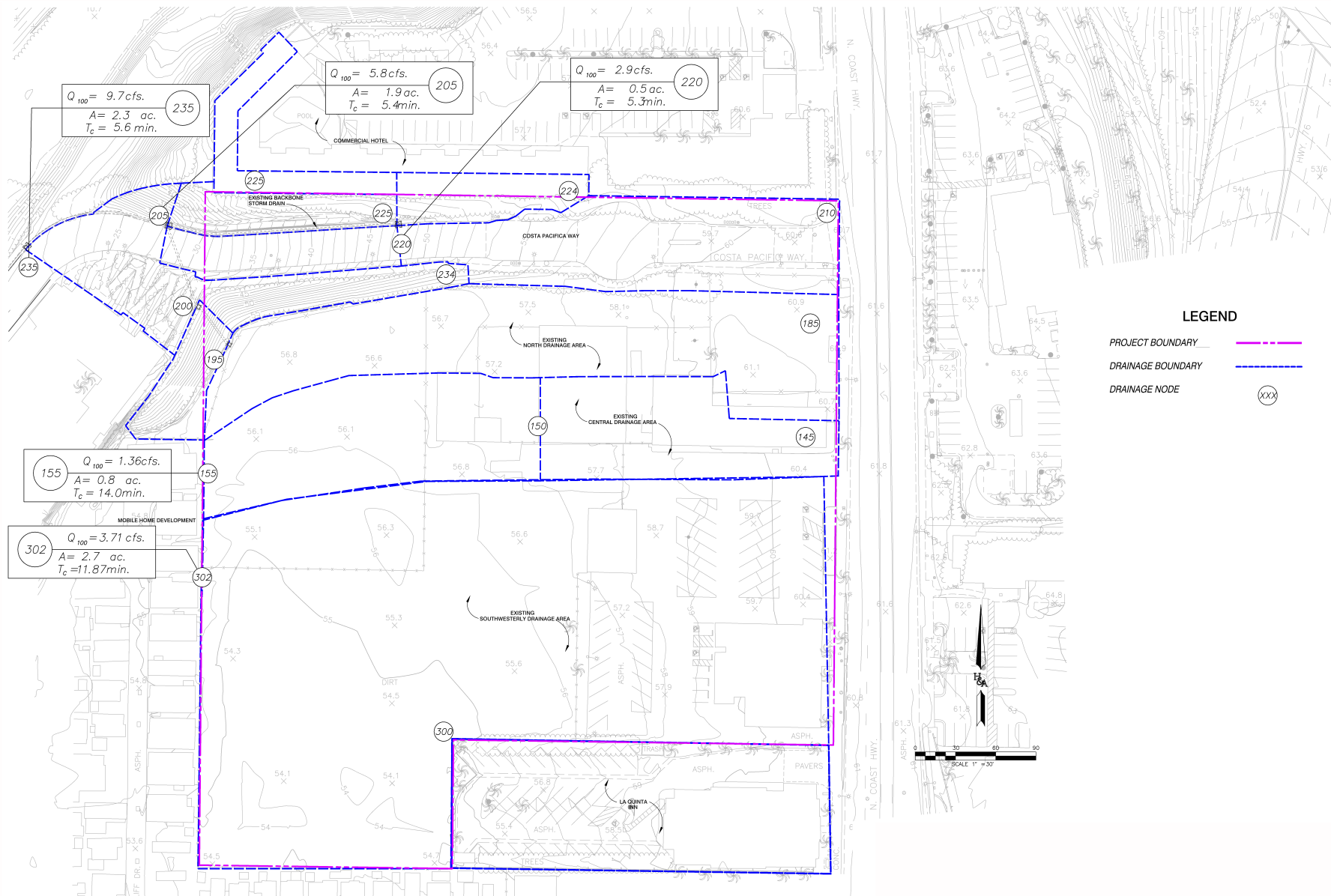
Path: Z:\aerial\GIS\Map\Projects\1148800\Map\DOC

SOURCE: Dudek, 2019

DUDEK

FIGURE 5-6
Massing Study
 Alta Oceanside Project

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SOURCE: Hunsaker, 2019

DUDEK

FIGURE 5-7
Existing Drainage Areas
Alta Oceanside Project

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LEGEND

- PROJECT BOUNDARY (dashed line)
- DRAINAGE BOUNDARY (solid line)
- FLOWLINE (dashed line with arrows)
- DRAINAGE NODE (circle with 'X')
- ROOF DRAINAGE DOWNSPOUT (square with 'X')

EXISTING

- Node 180: $Q_p = 25.2 \text{ cfs}$, $A = 6.12 \text{ ac}$, $T_p = 6.9 \text{ min}$
- Node 180: $Q_p = 25.95 \text{ cfs}$, $A = 6.30 \text{ ac}$, $T_p = 6.9 \text{ min}$
- Node 200: $Q_p = 5.80 \text{ cfs}$, $A = 1.94 \text{ ac}$, $T_p = 5.23 \text{ min}$
- Node 200: $Q_p = 10.30 \text{ cfs}$, $A = 6.1 \text{ ac}$, $T_p = 7.17 \text{ min}$
- Node 180: $Q_p = 6.28 \text{ cfs}$, $A = 0.63 \text{ ac}$, $T_p = 15.22 \text{ min}$
- Node 180: $Q_p = 6.62 \text{ cfs}$, $A = 3.2 \text{ ac}$, $T_p = 7.07 \text{ min}$

PROPOSED

- Node 200: $Q_p = 11.12 \text{ cfs}$, $A = 6.3 \text{ ac}$, $T_p = 7.3 \text{ min}$

Site Features:

- RENAISSANCE TERRACE CONDOMINIUMS
- Parking Structure
- Storm Vault
- Sewer Lift Station
- Underground
- ASPH.
- CLIFF DR. X
- SANDY CT DR.
- N. COAST HWY.
- COSTA PACIFIC WAY

Scale: 1" = 40'

North Arrow: (indicated by a vertical line with an arrow pointing up)

Coordinates: E 62136000.0000, E 62140000.0000, E 62146000.0000, E 62148000.0000

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