ALEXAN ESCONDIDO
and
BETHEL BAPTIST CHURCH PROJECT

Draft Environmental Impact Report

SCH No. 2023090610
Case No. PL23-0273, PL23-0274, PL23-0275, PL23-0276, PL25-0275, PL26-0010



January 2026

Prepared for:

ESCONDIDO
City of Choice

Planning Division
201 North Broadway
Escondido, California 92025

Prepared by:
HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, California 91942

This page intentionally left blank

TABLE OF CONTENTS

Section **Page**

EXECUTIVE SUMMARY ES-1
ES.1 Project Summary ES-1
ES.1.1 Project Location ES-1
ES.1.2 Project Description ES-2
ES.1.3 Project Objectives ES-3
ES.2 Areas of Known Controversy ES-4
ES.3 Issues to be Resolved ES-4
ES.4 Summary of Environmental Effects and Mitigation ES-4
ES.5 Project Alternatives ES-28
ES.5.1 Alternatives Evaluated in Detail ES-28
ES.5.2 Comparative Environmental Analysis ES-29
ES.5.3 Environmentally Superior Alternative ES-30

1.0 INTRODUCTION 1-1
1.1 Purpose and Intended Use of the EIR 1-1
1.2 Notice of Preparation 1-2
1.3 Scope of the EIR 1-9
1.4 Organization and Content of the EIR 1-9
1.5 Environmental Review Process 1-11
1.5.1 Draft EIR 1-11
1.5.2 Final EIR 1-11

2.0 ENVIRONMENTAL SETTING 2-1
2.1 Regional Setting 2-1
2.2 Project Site 2-2
2.3 Surrounding Land Uses 2-3
2.4 Planning Context 2-3
2.4.1 2025 Regional Plan 2-3
2.4.2 City of Escondido General Plan 2-4
2.4.3 Escondido Zoning Ordinance 2-5
2.4.4 North County Multiple Habitat Conservation Program 2-5

3.0 PROJECT DESCRIPTION 3-1
3.1 Project Location 3-1
3.2 Project Objectives 3-1
3.3 Project Characteristics 3-2
3.3.1 Residential 3-2
3.3.2 Resident Amenities 3-6
3.4 Project Design Features and Compliance Measures 3-8
3.5 Demolition, Grading, and Construction 3-8
3.6 Project Approvals 3-10

TABLE OF CONTENTS (cont.)

4.0 ENVIRONMENTAL ANALYSIS....4-1

4.1 Aesthetics....4.1-1
- 4.1.1 Existing Conditions....4.1-1
- 4.1.2 Regulatory Framework....4.1-6
- 4.1.3 Thresholds of Significance....4.1-9
- 4.1.4 Methodology and Assumptions....4.1-9
- 4.1.5 Project Impact Analysis....4.1-10

4.2 Air Quality....4.2-1
- 4.2.1 Existing Conditions....4.2-1
- 4.2.2 Regulatory Framework....4.2-6
- 4.2.3 Thresholds of Significance....4.2-10
- 4.2.4 Methodology and Assumptions....4.2-11
- 4.2.5 Project Impact Analysis....4.2-16

4.3 Biological Resources....4.3-1
- 4.3.1 Existing Conditions....4.3-1
- 4.3.2 Regulatory Framework....4.3-4
- 4.3.3 Thresholds of Significance....4.3-8
- 4.3.4 Methodology and Assumptions....4.3-9
- 4.3.5 Project Impact Analysis....4.3-9

4.4 Cultural Resources....4.4-1
- 4.4.1 Existing Conditions....4.4-1
- 4.4.2 Regulatory Framework....4.4-11
- 4.4.3 Thresholds of Significance....4.4-18
- 4.4.4 Methodology and Assumptions....4.4-18
- 4.4.5 Project Impact Analysis....4.4-19

4.5 Energy....4.5-1
- 4.5.1 Existing Conditions....4.5-1
- 4.5.2 Regulatory Framework....4.5-3
- 4.5.3 Thresholds of Significance....4.5-9
- 4.5.4 Methodology and Assumptions....4.5-9
- 4.5.5 Project Impact Analysis....4.5-9

4.6 Greenhouse Gas Emissions....4.6-1
- 4.6.1 Existing Conditions....4.6-1
- 4.6.2 Regulatory Framework....4.6-5
- 4.6.3 Thresholds of Significance....4.6-11
- 4.6.4 Methodology and Assumptions....4.6-12
- 4.6.5 Project Impact Analysis....4.6-13

4.7 Hazards and Hazardous Materials....4.7-1
- 4.7.1 Existing Conditions....4.7-1
- 4.7.2 Regulatory Framework....4.7-6
- 4.7.3 Thresholds of Significance....4.7-14
- 4.7.4 Methodology and Assumptions....4.7-15
- 4.7.5 Project Impact Analysis....4.7-16

TABLE OF CONTENTS (cont.)

4.8 Land Use and Planning 4.8-1
4.8.1 Existing Conditions 4.8-1
4.8.2 Regulatory Framework 4.8-2
4.8.3 Thresholds of Significance 4.8-8
4.8.4 Methodology and Assumptions 4.8-8
4.8.5 Project Impact Analysis 4.8-8
4.9 Noise 4.9-1
4.91.1 Existing Conditions 4.9-1
4.9.2 Regulatory Framework 4.9-3
4.9.3 Thresholds of Significance 4.9-8
4.9.4 Methodology and Assumptions 4.9-9
4.9.5 Project Impact Analysis 4.9-11
4.10 Population and Housing 4.10-1
4.10.1 Existing Conditions 4.10-1
4.10.2 Regulatory Framework 4.10-1
4.10.3 Thresholds of Significance 4.10-6
4.10.4 Methodology and Assumptions 4.10-6
4.10.5 Project Impact Analysis 4.10-7
4.11 Transportation 4.11-1
4.11.1 Existing Conditions 4.11-1
4.11.2 Regulatory Framework 4.11-5
4.11.3 Thresholds of Significance 4.11-10
4.11.4 Methodology and Assumptions 4.11-10
4.11.5 Project Impact Analysis 4.11-12
4.12 Tribal Cultural Resources 4.12-1
4.12.1 Existing Conditions 4.12-1
4.12.2 Cultural Setting 4.12-1
4.12.3 Tribal Cultural Resources 4.12-3
4.12.4 Regulatory Framework 4.12-3
4.12.5 Thresholds of Significance 4.12-5
4.12.6 Methodology and Assumptions 4.12-5
4.12.7 Project Impact Analysis 4.12-6

5.0 CUMULATIVE IMPACTS 5-1
5.1 Introduction 5-1
5.2 Cumulative Impact Analysis 5-2
5.2.1 Aesthetics 5-3
5.2.2 Air Quality 5-3
5.2.3 Biological Resources 5-4
5.2.4 Cultural Resources 5-5
5.2.5 Energy 5-6
5.2.6 Greenhouse Gas Emissions 5-7
5.2.7 Hazards and Hazardous Materials 5-7
5.2.8 Land Use and Planning 5-8

TABLE OF CONTENTS (cont.)

5.2.9 Noise 5-8
5.2.10 Population and Housing 5-9
5.2.11 Transportation 5-10
5.2.12 Tribal Cultural Resources 5-11

6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT 6-1
6.1 Agriculture and Forestry Resources 6-1
6.2 Geology and Soils 6-1
6.3 Hydrology and Water Quality 6-2
6.4 Mineral Resources 6-3
6.5 Public Services 6-4
6.5.1 Fire Protection 6-4
6.5.2 Police Protection 6-4
6.5.3 Schools 6-5
6.5.4 Parks 6-6
6.5.5 Libraries 6-6
6.5.6 Summary 6-6
6.6 Recreation 6-6
6.7 Utilities and Service Systems 6-7
6.7.1 New or Expanded Facilities 6-7
6.7.2 Water Supply 6-7
6.7.3 Solid Waste Management 6-9
6.8 Wildfire 6-10

7.0 OTHER CEQA-REQUIRED SECTIONS 7-1
7.1 Significant and Unavoidable Impacts 7-1
7.2 Significant and Irreversible Effects 7-1
7.2.1 Irreversible Commitment of Resources 7-2
7.2.2 Irreversible Environmental Changes 7-2
7.2.3 Potential Environmental Damage from Accidents 7-3
7.3 Growth Inducing Impacts 7-4
7.3.1 Direct Population Growth 7-4
7.3.2 Economic Growth 7-4
7.3.3 Removing Obstacles to Growth 7-5

8.0 ALTERNATIVES 8-1
8.1 Introduction 8-1
8.2 Project Objectives 8-2
8.3 Significant Environmental Effects of the Project 8-2
8.4 Alternatives Considered but Rejected from Further Analysis 8-3
8.5 Project Alternatives 8-3
8.5.1 No Project Alternative 8-4
8.5.2 Reduced Density Alternative 8-7
8.5.3 Reduced Footprint Alternative 8-10
8.5.4 Planned Office Land Use Alternative 8-14

8.6 Comparative Summary of Impacts 8-17
8.7 Environmentally Superior Alternative 8-18

9.0 REFERENCES 9-1

10.0 LIST OF PREPARERS 10-1

LIST OF APPENDICES

A Notice of Preparation and NOP Comments
B Air Quality and Greenhouse Gas Emissions Technical Report
C Biological Resources Letter Report for the Alexan Escondido Project
D Biological Resources Assessment for the Bethel Church Project
E Cultural Resources Survey
F Historical Resource Evaluation Report
G Phase I Environmental Site Assessment
H Phase II Environmental Site Assessment
I Noise Technical Report
J Local Mobility Analysis
K Preliminary Hydrology Study for Alexan Escondido
L Preliminary Hydrology Study for Escondido Church
M Priority Development Project Stormwater Quality Management Plan for Alexan Escondido
N Priority Development Project Stormwater Quality Management Plan for Escondido Church
O Preliminary Geotechnical Investigation for Alexan Escondido

LIST OF FIGURES

No.	Title	Follows Page
2-1	Regional Location	2-2
2-2	USGS Topography	2-2
2-3	Project Vicinity	2-2
3-1	Residential Development Site Plan	3-2
3-2	Bethel Baptist Church Site Plan	3-2
3-3	Building Elevations – Type A	3-4
3-4	Building Elevations – Type B	3-4
3-5	Building Elevations – Type C	3-4
3-6a	Building Elevations – Type D	3-4
3-6b	Building Elevations – Type D	3-4
3-7	Building Elevations – Clubhouse/Leasing Center	3-4
3-8	Building Elevations – Pet Spa	3-4
3-9	Proposed Landscape Plan – Alexan Escondido	3-6
3-10	Church Building Elevations	3-6
3-11	Proposed Landscape Plan – Bethel Baptist Church	3-8
3-12a	Project and Roadway Cross-sections	3-8
3-12b	Project and Roadway Cross-sections	3-8
3-13	Grading Plan – Alexan Escondido	3-10
3-14	Grading Plan – Bethel Baptist Church	3-10
4.1-1a	Existing Visual Conditions – Brotherton Road Frontage	4.1-4
4.1-1b	Existing Visual Conditions – Brotherton Road Frontage	4.1-4
4.1-2	Existing Visual Conditions – Felicita Road Frontage	4.1-4
4.1-3	Existing Visual Conditions – I-15	4.1-4
4.3-1	Vegetation Map – Alexan Escondido	4.3-2
4.3-2	Vegetation Map – Bethel Baptist Church	4.3-2
4.7-1	On-site Impacted Soils	4.7-18
4.9-1	On-Site Receiver Locations	4.9-12
4.9-2	Vibratory Roller Static Mode Usage Area	4.9-16
5-1	Cumulative Projects	5-2

LIST OF TABLES

No.	Title	Page
ES-1	Summary of Project Impacts and Mitigation Measures	ES-5
ES-2	Comparison of Project and Alternative Impacts	ES-30
1-1	Summary of Written Comments on Notice of Preparation	1-3
3-1	Residential Development Summary	3-3
3-2	Project Approvals	3-11
4.1-1	Project Consistency with General Plan Visual Resources Policies	4.1-12
4.2-1	Common Sources and Human Health Effects of Criteria Air Pollutants	4.2-3
4.2-2	San Diego Air Basin Attainment Status	4.2-4
4.2-3	Air Quality Monitoring Data	4.2-5
4.2-4	Ambient Air Quality Standards	4.2-6
4.2-5	Screening Thresholds for Air Quality Impact Analysis	4.2-11
4.2-6	Anticipated Construction Schedule	4.2-12
4.2-7	Construction Equipment Assumptions	4.2-13
4.2-8	Maximum Daily Construction Emissions	4.2-18
4.2-9	Maximum Daily Operational Emissions	4.2-19
4.3-1	Vegetation and Land Cover Types within the BSA	4.3-2
4.6-1	Global Warming Potentials and Atmospheric Lifetimes	4.6-3
4.6-2	California Greenhouse Gas Emissions by Sector	4.6-4
4.6-3	2012 City of Escondido Greenhouse Gas Emissions Inventory	4.6-4
4.6-4	Construction Greenhouse Gas Emissions	4.6-14
4.6-5	Operational Greenhouse Gas Emissions	4.6-14
4.7-1	Listed Hazardous Waste Facilities within the Project Area	4.7-3
4.7-2	Listed Leaking Storage Tank Facilities within the Project Area	4.7-4
4.8-1	General Plan Policy Consistency Analysis	4.8-12
4.9-1	Exterior Land Use/Noise Compatibility Guidelines	4.9-4
4.9-2	Incremental Noise Impact Standards	4.9-5
4.9-3	Ground-borne Vibration Impact Criteria	4.9-6
4.9-4	Exterior Noise Limits	4.9-6
4.9-5	Existing and Existing + Project Traffic Volumes	4.9-12
4.9-6	Construction Equipment Noise Levels	4.9-12
4.9-7	Off-site Traffic Noise Levels	4.9-13
4.9-8	Off-site HVAC Noise	4.9-14
4.9-9	Off-site Traffic Noise Levels	4.9-16
4.10-1	City of Escondido Summary of RHNA Status	4.10-5
4.11-1	Existing Intersection Operations	4.11-4
4.11-2	Existing Street Segment Operations	4.11-4
4.11-3	City of Escondido Level of Service Thresholds	4.11-12

LIST OF TABLES (cont.)

No.	Title	Page
4.11-4	Existing Plus Project Intersection Operations	4.11-14
4.11-5	Existing Plus Project Street Segment Operations	4.11-15
4.11-6	Near-Term Plus Project Intersection Operations	4.11-17
4.11-7	Near-Term Plus Project Street Segment Operations	4.11-18
4.11-8	Long-Term Plus Project Intersection Operations	4.11-20
4.11-9	Long-Term Plus Project Street Segment Operations	4.11-21
5-1	Cumulative Projects	5-2
5-2	Cumulative Off-Site Traffic Noise Levels	5-9
6-1	School Enrollment and Capacity	6-5
8-1	Comparison of Project and Alternative Impacts	8-18

ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
µPa	micro-Pascal
AB	Assembly Bill
ACM	asbestos-containing material
ADMRT	Air Dispersion Modeling and Risk Tool
ADT	average daily trips
AERMAP	AMS/EPA Regulatory Model Terrain Pre-processor
AERMOD	AMS/EPA Regulatory Model
AF	acre-feet
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
AOC	area of concern
APN	Assessor's Parcel Number
APS	Alternative Planning Strategy
AR	Administrative Regulation
AR4	Fourth Assessment Report
AR5	Fifth Assessment Report
AST	above ground storage tank
ASTM	American Society for Testing and Materials
bgs	below ground surface
BMP	best management practice
BSA	biological survey area
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aided Noise Abatement
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalRecycle	Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board

ACRONYMS AND ABBREVIATIONS (cont.)

CBC	California Building Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFC	chlorofluorocarbon
CFG Code	California Fish and Game Commission
CFR	Code of Federal Regulations
CH_4	methane
CHHSL	California Human Health Screening Level
CHP	California Highway Patrol
CIP	capital improvement program
City	City of Escondido
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COC	contaminants of concern
County	County of San Diego
CPIOZ	Community Plan Implementation Overlay Zone
CPS	cleanup program site
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMP	Cultural Resources Monitoring Program
CTC	California Transportation Commission
CWA	Clean Water Act
CWMP	Construction Waste Management Plan
CY	cubic yard
dB	decibel
dBA	A-weighted decibel
DEH	Department of Health
District	San Diego Unified School District
DOC	California Department of Conservation
DOE	U.S. Department of Energy
DPM	diesel particulate matter
DSA	Office of the Division of the State Architect

DTSC	Department of Toxic Substance Control
du/ac	dwelling units per acre
EDI	Escondido Disposal, Inc.
EFD	Escondido Fire Department
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMFAC	Emission Factor
EO	Executive Order
EPCA	Federal Energy Policy and Conservation Act
EPD	Escondido Police Department
EPIC	University of San Diego School of Law Energy Policy Initiative Center
EQR	Environmental Quality Regulations
ESA	environmentally sensitive area
ESA	environmental site assessment
ESL	Environmentally Sensitive Land
EUSD	Escondido Union School District
EV	electric vehicle
EVCS	electric vehicle charging station
FAA	Federal Aviation Administration
FAR	floor area ratio
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FPC	Facilities Planning and Construction
FTA	Federal Transit Administration
G.W.	George Walker
g/L	grams per liter
GGE	gross gasoline equivalent
GHG	greenhouse gas
GWh	gigawatt-hour
GWP	global warming potential
H&SC	California Health and Safety Code
HAP	Hazardous Air Pollutant
HARRF	Hale Avenue Resource Recovery Facility
HCD	California Department of Housing and Community Development
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plan

ACRONYMS AND ABBREVIATIONS (cont.)

HPC	Historic Preservation Commission
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-	Interstate
IA	Implementing Agreement
IBC	International Building Code
IEPR	Integrated Energy Policy Report
IFC	International Fire Code
in/sec	inches per second
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
kHz	kilohertz
KMCP	Kearny Mesa Community Plan
kWh	kilowatt-hour
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
LDM	Land Development Manual
L_{DN}	day night sound level
L_{EQ}	time-averaged noise level
LMA	Local Mobility Assessment
LOS	level of service
LUST	leaky underground storage tank
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MERV	Minimum Efficiency Reporting Value
MHCP	Multiple Habitat Conservation Program
MHPA	Multi-Habitat Planning Area
MLD	most likely descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mpg	miles per gallon
mph	miles per hour
MPO	metropolitan planning organization
MRZ	Mineral Resource Zone

MSCP	Multiple Species Conservation Program
MT	metric tons
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCTD	North County Transit District
NE	Narrow Endemic
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO	nitrogen oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise sensitive land use
O_3	ozone
OAEP	Operational Area Emergency Plan
OCP	organochloride pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PAU	Paramedic Assessment Unit
Pb	lead
P-D	Planned Development
PEIR	Program Environmental Impact Report
PEV	plug-in vehicle
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric
PM	particulate matter
PM_{10}	respirable particulate matter 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter 2.5 microns or less in diameter
PO	Planned Office
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaic

RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model
RCP	reinforced concrete pipe
RCRA	Resources Conservation and Recovery Act
RDDMWD	Rincon Del Diablo Municipal Water District
R-E	Residential-Estates
RE-20	20,000-foot or square-foot minimum lot size
REC	recognized environmental condition
REL	recommended exposure level
RHNA	Regional Housing Needs Allocation
RMS	root mean square
ROG	reactive organic gas
ROW	right-of-way
RPS	Renewable Portfolio Standard
RRP Rule	Lead Renovation, Repair and Painting Rule
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	Suburban
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SAP	subarea plan
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDGE	San Diego Gas & Electric
SDMC	San Diego Municipal Code
sec	seconds
SF	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLCP	short-lived climate pollutants
SLs	screening levels
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOI	Secretary of the Interior
SPL	sound pressure level

ACRONYMS AND ABBREVIATIONS (cont.)

SR	State Route
SRA	State Responsibility Area
STC	Sound Transmission Class
STIP	California Statewide Transportation Improvement Program
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAZ	traffic analysis zone
TCA Tribe	traditionally and culturally affiliated tribe
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21st Century
TIAG	Traffic Impact Analysis Guidelines
U.S.	United States
U.S. Census Bureau	U.S. Department of Commerce Bureau of the Census
U.S.C.	U.S. Code
UNFCCC	United Nations Framework Convention on Climate Change
USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
v/c	volume to capacity ratio
VdB	vibration decibel
VEC	vapor encroachment condition
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VPHCP	Vernal Pool Habitat Conservation Plan
µg/m^3	micrograms per cubic meter

This page intentionally left blank

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) for the proposed Alexan Escondido and Bethel Baptist Church Project and associated discretionary actions (collectively referred to throughout this EIR as the "project") has been prepared on behalf of the City of Escondido (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000, et seq.). The City of Escondido (City) is the CEQA Lead Agency for the EIR and, as such, has the primary responsibility for evaluating environmental effects of the proposed project and considering whether to approve the proposed project in consideration of these effects. The U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) also have approval authority of the project and are thereby considered CEQA Responsible Agencies. The California Department of Fish and Wildlife (CDFW) has jurisdiction over natural resources that could be affected by the project and is considered a CEQA Trustee Agency. The Responsible and Trustee Agencies must consider the environmental effects of the proposed project when considering their project-related actions.

As required by CEQA, this EIR includes the following information: (1) a description of the proposed project, including its location, objectives, and features; (2) a description of the existing conditions at the project site and surrounding areas; (3) an analysis of the direct, indirect, temporary, permanent, and cumulative adverse physical effects that would occur to existing conditions should the proposed project be approved and implemented; (4) an identification of feasible means of avoiding or substantially lessening the significant adverse effects; (5) a determination of significance for each impact after mitigation is incorporated; and (6) an evaluation of a reasonable range of alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant environmental impact.

This Executive Summary provides an overview of the project and project objectives, discloses areas of controversy and issues to be resolved, summarizes the environmental impacts of the project and recommended mitigation measures, and identifies project alternatives.

ES.1 Project Summary

ES.1.1 Project Location

The project site, which is located at 855 Brotherton Road within the southern portion of the City, consists of two parcels (Assessor's Parcel Number [APN] 236-333-41-00 and APN 236-333-53-00) that encompass a total of 14.83 acres. The western portion of the site (approximately eight acres) is proposed for residential development and the eastern portion of the site (approximately seven acres) is proposed for the new church. The project site is bounded by Felicita Road to the west; Brotherton Road to the north; single-family homes (along Miller Avenue) to the east, and single-family homes along Palm Terrace and agricultural uses along Miller Avenue to the south.

The project site is developed with a church building, two private education buildings, playgrounds, a basketball court, and surface parking on an elevated building pad, and also contains a drainage swale, dirt/vegetated fields, and utility infrastructure. The surrounding area consists of single-family residences to the west; single-family residences, a nursing home, and Miller Elementary School to the north; single-family residences and a small orchard to the east; and single-family residences and agriculture uses to the south. Interstate 15 (I-15) is located approximately 120 feet to the west of the site.

ES.1.2 Project Description

The proposed project consists of two components including: (1) demolition/removal of an existing church building and parking lot and the construction of 258 units of multi-family residential housing within ten buildings and a leasing/amenity building on an approximately eight-acre area in the western portion of the project site (residential site); and (2) the construction of a new church building adjacent to two existing private school buildings on an approximately seven-acre area in the eastern portion of the site (church site).

The proposed residential development includes 258 multi-family apartments within 10 buildings with a mix of one- to three-bedroom units. It is anticipated that 13 of the residential units will be affordable. The residential buildings would include four different building types, each with a different form and combination of units. The unit mix would include 112 one-bedroom units ranging in size from approximately 700 to 800 square feet (SF), 122 two-bedroom units ranging between approximately 1,000 and 1,600 SF, and 24 three-bedroom units between 1,600 and 1,800 SF. The total residential gross building area would encompass approximately 350,380 SF Proposed resident amenities include a clubhouse/leasing center building, garages, a pet spa, a swimming pool, grassy lawns, and outdoor gathering areas. The total area of utilities, garage, and amenity space would be 15,479 SF, for a total gross building area of 365,859 SF. Access to the residential site and parking areas providing 441 parking spaces would occur via Felicita Road and Brotherton Road. The project also proposes widening of Felicita Road and the provision of sidewalks along Felicita Road. Site runoff from the residential development would be directed to three proposed stormwater biofiltration basins within the residential development site. A proposed 54-inch reinforced concrete pipe and dual 30-inch reinforced concrete pipe storm drains would convey flows through the existing storm drain system to ultimately discharge south of I-15.

The proposed church development includes the demolition of an existing 24,395 SF sanctuary building located on the western wing, construction of a new church building, two short-term stay residential units for traveling missionaries, an outdoor courtyard, playgrounds, and associated parking and access drives. The proposed church building would encompass 24,627 SF with an approximately 600-seat sanctuary, an entryway/foyer, offices, meeting rooms, a kitchen, and storage. The new building would be an addition to, and would connect with, the two existing school buildings that serve as children/youth classrooms and meeting spaces for the church. The church development would also construct two dwelling units in the eastern portion of the church site. These units would be used as temporary housing for traveling missionaries supported by the church. One unit would include a primary residence with an area of approximately 1,050 SF, and the other would be an approximately 500 SF accessory dwelling unit. Access to the church development would be provided from two entries along Brotherton Road generally where the existing access drives are located. Site runoff from the proposed church development would be directed to two proposed stormwater biofiltration basins in the northeastern corner of the church site and one stormwater biofiltration basin in the southern portion of the church site. The two northeastern biofiltration basins would discharge to curb outlets on Brotherton Road, while the southern biofiltration basin would discharge to three separate outlets onto the southern adjacent property.

Utility connections would be made to existing water and sewer mains, electric lines, natural gas lines, and telecommunications infrastructure in Felicita Road and Brotherton Road.

The project would be developed in one phase, including demolition and removal of the existing church building and parking lot on the site, and occur over approximately 25 months.

The project applicant is requesting the following discretionary approvals from the City to allow for development of the proposed project:

- General Plan Amendment for both parcels to change the General Plan land use designation from Planned Office (PO) to Urban V (U5 – 30 dwelling units per acre).
- Zone Change from RE-20 (Residential Estate) to R-5-30 (up to 30 dwelling units per acre) for both parcels to create consistency with the proposed General Plan Amendment.
- A Major Plot Plan (Site Development Plan) and Design Review Permit for construction of 258 multi-family units, and a Density Bonus Request including certain concessions/incentives, and waivers as permitted by State Density Bonus Law.
- A Conditional Use Permit (CUP) to modify an existing CUP for the existing religious/school facilities, and a Design Review Permit for construction of 24,627 square-foot sanctuary and lobby addition to the existing building.
- Grading Exemptions to permit fill slopes/retaining walls up to approximately 12’-0” in height.
- Adjustment Plat for a proposed Lot Line Adjustment to modify the existing property lines on the Property.

ES.1.3 Project Objectives

The general purpose of the project is to construct new residential infill development that includes affordable housing to help meet the current demand for housing in the City and region, as well as construct a new church building for the continued use of existing on-site land uses of the church and private school. The following specific objectives have been identified for the proposed project:

1. Address the City’s housing supply needs by providing for the development of a mix of housing units to maximize the advantages of locating new infill housing near existing regional transportation facilities with convenient freeway access.
2. Provide an environmentally sustainable residential development through the implementation of features such as energy conservation, sustainable landscape, water conservation, and support for alternative transportation, consistent with the City’s Climate Action Plan (CAP).
3. Provide a diverse range of high-quality rental housing that will offer a mix of unit types, sizes, and levels of affordability to accommodate a range of potential residents.
4. Provide for the construction of housing that is consistent with the City of Escondido 2019-2029 Housing Element to assist the City in satisfying its Regional Housing Needs Allocation (RHNA) for both market rate and below market rate housing units.
5. Subdivide an underutilized site to provide both market rate and affordable housing.
6. Provide a new modern church facility on the site that integrates with the existing education buildings to allow for the continued use of the church and private school.

ES.2 Areas of Known Controversy

CEQA Guidelines Section 15123 requires that an executive summary of an EIR include areas of controversy known to the Lead Agency, including issues raised by other public agencies and/or the public. A Notice of Preparation (NOP) was circulated between September 28, 2023 and October 30, 2023 to solicit agency and public comments on the scope and content of the environmental analysis. The City also hosted a virtual EIR scoping meeting on October 11, 2023.

Comments received during the NOP public scoping period and EIR scoping meeting were considered as part of the preparation of this EIR. Comments addressed numerous topics, including aesthetics, transportation, land use, biological resources, cultural resources, air quality, greenhouse gas (GHG) emissions, noise, public services and utilities, public safety, hazardous materials, water quality, and flooding. A copy of the NOP and comments received during the NOP review period are contained in Appendix A of the EIR.

ES.3 Issues to be Resolved

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The issues to be resolved by the decision makers for the project include the choice among alternatives and whether or how to mitigate the significant effects. Further discussion of these topics is provided in Section ES.4 and ES.5.

Table ES-1, *Summary of Project Impacts and Mitigation Measures*, at the end of this Executive Summary identifies potential environmental effects of the proposed project and feasible mitigation measures that could reduce or avoid the identified environmental impacts. Issues to be resolved that are directly related to the proposed project include whether or how to mitigate the significant effects. In particular, the decision makers must decide if the significant impacts associated with biological resources, cultural resources, hazards and hazardous materials, noise, transportation, and tribal cultural resources have been mitigated below a level of significance. Lastly, the decision makers must determine whether the project alternatives would substantially reduce significant effects while still meeting key objectives of the project.

ES.4 Summary of Environmental Effects and Mitigation

This EIR examines the potential environmental effects of the proposed project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. Table ES-1 provides a summary of the environmental impacts that could result from implementation of the proposed project and feasible mitigation measures that would reduce or avoid the potentially significant impacts. For each issue, Table ES-1 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after the implementation of mitigation measures. Impacts related to agricultural and forestry resources, geology and soils, hydrology and water quality, mineral resources, public services, recreation, utilities and service systems, and wildfire were determined to not present a potentially significant environmental impact and are discussed further in Chapter 6.0, *Effects Found Not to be Significant*.

Table ES-1
SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Aesthetics						
Scenic Vistas	The proposed project would not have a substantial adverse effect on a scenic vista.	LS	LS	No mitigation is required.	--	--
Scenic Resources	The proposed project would not damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.	LS	LS	No mitigation is required.	--	--
Visual Character and Quality	The project would not conflict with regulations governing scenic quality, nor would it substantially degrade the existing visual character or quality of public views of the site and its surroundings.	LS	LS	No mitigation is required.	--	--
Light and Glare	The proposed project would not create substantial sources of light or glare.	LS	LS	No mitigation is required.	--	--
Air Quality						
Air Quality Plans	The project would not conflict with or obstruct implementation of the applicable air quality plans.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Air Quality Standards	The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.	LS	LS	No mitigation is required.	--	--
Sensitive Receptors	The project would not expose off-site sensitive receptors to substantial pollutant concentrations.	LS	LS	No mitigation is required.	--	--
Other Emissions (Such as Odors)	The project would not result in emissions, including those leading to odors, adversely affecting a substantial number of people	LS	LS	No mitigation is required.	--	--
Biological Resources						
Special-Status Species	The project has the potential to result in adverse effects to protected nesting birds and raptors. No adverse effects to special-status plant or wildlife would occur.	PS	PS	**BIO-1: Avoidance of Nesting Birds.** Prior to the issuance of grading or demolition permits, the City of Escondido shall verify that the following measure is shown on the grading and demolition plans: If trimming, grubbing, or vegetation clearing occurs within the nesting season (January 15 to August 31), nesting bird surveys for migratory birds and raptors shall be performed for the proposed impact area and a 300-foot buffer, where accessible, by a qualified biologist no more than 72 hours before the start of vegetation removal. If active nests are found, no-work buffers of no less than 50 feet and no more than 300 feet (for raptor	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				species) shall be established around active nests identified within and adjacent to the project site. The qualified biologist shall determine the appropriate buffer size and level of nest monitoring necessary based on agency protocols or the species' life history, the species' sensitivity to disturbances, individual behavior, status of nest, location of nest and site conditions, presence of screening vegetation, anticipated project construction activities, ambient noise levels compared to project-related noise levels, existing non- project-related disturbances in vicinity, and existing levels of human activity. The no-work buffer shall be flagged and mapped on the construction plans and maintained until the nesting cycle is determined by the qualified biologist to be complete. Construction shall be allowed to continue outside of the no-work buffers. Periodic monitoring, at intervals determined to be necessary by the qualified biologist, of active nests shall occur to ensure the Project does not result in the failure of the nest. At the discretion of the qualified biologist, additional minimization measures may be implemented if a nesting bird appears to be stressed as a result of project activities and the no-work buffer does not appear to provide adequate protection. Buffer sizes may also be reduced, or the extent of nest monitoring may be reduced, at the discretion of the qualified biologist. Any changes to buffer sizes and/or nest monitoring frequency shall be documented and provided to the City of Escondido.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Sensitive Natural Communities	The project would result in direct adverse effects to sensitive natural communities. However, the project would not result in indirect adverse effects to sensitive natural communities.	PS	PS	**BIO-2: Sensitive Vegetation Communities: Non-native Grassland**. Prior to the issuance of a grading permit, direct impacts to 7.18 acres of non-native grassland shall be mitigated at a 0.5:1 ratio through purchase of mitigation credits at an approved mitigation bank.	LS	LS
Wetlands	The project would have a direct, substantial adverse effect on state or federally protected wetlands.	PS	PS	**BIO-3**: **Sensitive Vegetation Communities: Emergent Wetland.** Prior to the issuance of a grading permit, direct impacts to 0.31 acre of emergent wetland shall be mitigated at a 3:1 ratio through off-site restoration, enhancement, and/or establishment/re-establishment or purchase of mitigation credits at a mitigation bank holding a Bank Instrument executed with the California Department of Fish and Wildlife (CDFW). Final mitigation requirements for impacts to emergent wetland shall be determined in consultation with the resource agencies (U.S. Army Corps of Engineers, CDFW, and Regional Water Quality Control Board) during the wetland permitting process.	LS	LS
Wildlife Movement	The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Local Policies Protecting Biological Resources	The project would not conflict with local policies protecting biological resources.	LS	LS	No mitigation is required.	--	--
Conservation Plans	The project would not conflict with the provisions of an adopted or approved habitat conservations plan.	LS	LS	No mitigation is required.	--	--
Cultural Resources						
Historical Resources	The project would not cause a substantial adverse change in the significance of a historical resource.	LS	LS	No mitigation is required.	--	--
Archaeological Resources	The project could result in a substantial adverse change in the significance of an unknown archaeological resource.	PS	PS	**CUL-1: Tribal Cultural Resource Treatment and Monitoring Agreement**. If requested by one or more participating tribes, the applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the project area ("TCA Tribe") prior to issuance of a grading permit to be submitted to the City. The purposes of the agreement are: (1) to provide the applicant with clear expectations regarding tribal cultural resources; and (2) to formalize protocols and procedures between the City, applicant, and the TCA Tribe(s) per the measures in this document for the protection and treatment of, including but not limited to, Native American human remains; funerary objects; cultural and religious landscapes; ceremonial items; traditional gathering areas; and cultural items located and/or discovered through a	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities. A fully executed copy of the agreement and a wet-signed copy of the monitoring plan shall be provided to the City's Planning Department to ensure compliance with the conditions of approval.		
				CUL-2: Cultural Resources Monitoring Program. Prior to issuance of a grading permit, the applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology ("qualified archaeologist") to prepare a Cultural Resources Monitoring Program (CRMP) in coordination with participating tribe(s). The CRMP shall include any additional information that can be utilized to determine the appropriate monitoring program. The qualified archeologist and Native American monitor(s) associated with TCA Tribe(s) shall implement the monitoring program, as described in the CRMP. The archaeologist shall be responsible for coordinating with the Native American monitor(s). Verification shall be presented to the City in a letter from the qualified archaeologist that confirms that Native American monitor(s) representing requesting TCA Tribes have been retained. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				CUL-3: Pre-construction Meeting. The qualified archaeologist and Native American monitor(s) shall attend the pre-grading meeting with the construction contractor to explain and coordinate the requirements of the CRMP. **CUL-4: Archaeological and Native American Monitoring**. The qualified archaeologist and the Native American monitor(s) shall be on site as required by the CRMP during the initial grubbing, site grading, excavation or disturbance of the ground surface. The CRMP shall include protocols for monitoring and, if applicable, shall include any additional information and related monitoring procedures for specific areas of the project site that have been previously disturbed. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring shall be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor(s), shall be responsible for determining the duration and frequency of monitoring.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				CUL-5: Cultural Resources Discovery. In the event that previously unidentified cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor(s), shall have the authority to temporarily divert or temporarily halt ground disturbance in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored activity can proceed. **CUL-6: Assessment of Cultural Resources Discovery**. If a potentially significant historical, unique archaeological, and/or tribal cultural resource is discovered, the qualified archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the affiliated identified through state-mandated consultation, and the Native American monitor(s), shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and the Native American monitor(s) and be submitted to the City for review and approval.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				CUL-7: Cultural Material Recovery. The avoidance and/or preservation of the significant cultural resource (historical, unique archaeological and/or tribal cultural resource) or Native American remains must first be considered and evaluated as required by CEQA. Where any significant cultural resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then consultation with the affiliated Tribes must be conducted to determine methods to mitigate impacts. Should data recovery be determined as appropriate, the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe(s) and the Native American monitor(s), shall prepare a research design and data recovery program, subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor(s), shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.		

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

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				CUL-9: Tribal Cultural Resources. If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor(s) must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the unearthed archaeological materials that qualify as tribal cultural resources, a Native American monitor may, at their discretion, collect the materials. All materials are to be kept on the project site in a secured location as agreed upon by the TCA Tribe(s) for later reburial on-site. Invasive or non-invasive testing is prohibited unless prior written permission from the affiliated Tribes has been received. Should the affiliated Tribes decline the collection, the collection shall be curated at a San Diego curation facility or a culturally-affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor(s), to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center. The project archaeologist must provide written proof to the City's Planning Division that the San Diego Archaeological Center accepted and received the collections within 6 weeks upon completion of the Final Monitoring Report.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				CUL-10: Monitoring/Evaluation Report. Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis, and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor(s) shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report shall include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.		
Human Remains	The project would not disturb human remains.	LS	LS	No mitigation is required. Mitigation measure CUL-8 enforces applicable regulations.	--	--
Energy						
Energy Consumption	The project would not result in the wasteful or inefficient use of energy resources.	LS	LS	No mitigation is required.	--	--
Renewable Energy Plans	The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LS	LS	No mitigation is required.	--	--
Greenhouse Gas Emissions						
Greenhouse Gas Emissions	The project would not generate GHG emissions that would have a significant impact on the environment.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Greenhouse Gas Reduction Plan Consistency	The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.	LS	LS	No mitigation is required.	--	--
Hazards and Hazardous Materials						
Routine Transport, Use, or Disposal of Hazardous Materials	The project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials.	LS	LS	No mitigation is required.	--	--
Accidental Release of Hazardous Materials	The project could result in a hazard related to the release of hazardous materials during demolition and ground disturbance associated with contaminated soil and hazardous building materials. No hazard related to upset or accident conditions would be created during project operation.	PS	LS	**HAZ-1: Soil Sampling, Removal, and Disposal**. Prior to the issuance of a grading permit, the project applicant shall conduct near surface soil sampling and analysis in the southeastern portion of the site, limited to the area identified as Grid E6 on Figure 4.7-1, to define the limits of on-site soils impacted by dieldrin. A soil sampling and removal report that delineates the limits of impacted soils and identifies recommendations regarding excavation, removal, and disposal of impacted soils shall be prepared and submitted for approval to the City's Development Services Department. The soil sampling and removal report shall also be submitted to the County Department of Environmental Health and Quality (DEHQ) for review through the Voluntary Assistance Program (VAP). The DEHQ may refer the project to the Department of Toxic Substances Control (DTSC) or the Regional Water Quality Control Board (RWQCB) for oversight. The project shall implement the remediation requirements established by the	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				DEHQ, DTSC, or RWQCB until a ”No Further Action” letter or “Concurrence” letter is issued to indicate the completion of all remediation activities. The site-specific recommendations identified in the soil sampling and removal report and confirmed by the DEHQ, DTSC, or RWQCB shall be implemented by the construction contractor during grading activities, and impacted soils shall be disposed of at an appropriate disposal facility. Following completion of grading activities and soil removal and disposal, the project applicant shall provide a letter to the City’s Development Services Department documenting that impacted soils were removed and disposed of in accordance with the recommendations in the soil sampling and removal report and at a disposal facility permitted to receive the impacted soils. The “No Further Action” or “Concurrence” letter from the overseeing entity shall also be provided to the City’s Development Services Department to confirm that the project has completed review through the DEHQ VAP. **HAZ-2**: **Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal**. Prior to issuance of a demolition or grading permit, an asbestos and lead survey shall be conducted on the project site by a licensed asbestos/lead contractor. If the survey identifies hazardous building materials, the project applicant shall complete the necessary remediation identified in the survey prior to commencement of demolition activities in accordance with applicable laws, including Occupational Safety and Health Administration (OSHA) guidelines, to ensure that no hazards to the demolition crew, adjacent residents,		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				or others are created by exposure to hazardous building materials. The project applicant shall provide a letter to the City's Development Services Department stating that a licensed asbestos/lead contractor has been retained at the project applicant's expense to conduct the asbestos and lead survey, and a letter report summarizing the conclusions and recommendations of the asbestos and lead survey shall be prepared and submitted to the City's Development Services Department.		
Hazardous Emissions Near Schools	The project could emit hazardous emissions within one-quarter mile of an existing or proposed school during construction.	PS	LS	See mitigation measures HAZ-1 and HAZ-2, above.	LS	LS
Listed Hazardous Materials Sites	The project is not on a list of hazardous material sites and would not create a significant hazard to the public or environment.	LS	LS	No mitigation is required.	--	--
Airport Hazards	The project would not result in a safety hazard related to airports for people in the project area.	LS	LS	No mitigation is required.	--	--
Emergency Response and Evacuation Plans	The project would not impair the implementation of or physically interfere with an adopted emergency response or evacuation plan.	LS	LS	No mitigation is required.	--	--
Wildland Fires	The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Land Use and Planning						
Community Division	The project would not physically divide an established community.	LS	LS	No mitigation is required.	--	--
Land Use Plans, Policies, and Regulations	The project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.	LS	LS	No mitigation is required.	--	--
Noise						
Excessive Noise Levels	Project construction would generate a temporary increase in ambient noise levels in excess of applicable standards. Operation of the project would not generate permanent increases in ambient noise levels in excess of applicable standards.	LS	LS	No mitigation is required.	--	--
Vibration	The project would generate excessive groundborne vibration during construction. No substantial vibration would be generated during project operation.	PS	LS	**NOI-1 Vibratory Roller Usage Limits.** Vibratory rollers shall be used in static mode only (no vibrations) when operating within 80 feet of an occupied residential building, as shown in Figure 4.9-2, *Vibratory Roller Static Mode Usage Area*, of this EIR. The contractor shall specify vibratory roller model, size, or operating mode restrictions on all demolition, grading, and construction permits.	LS	LS
Aircraft Noise	The project would not expose people residing or working in the project area to excessive noise levels due to aircraft activity.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Population and Housing						
Unplanned Growth	The project would not induce substantial unplanned population in the area.	LS	LS	No mitigation is required.	--	--
Displacement	The project would not displace existing people or housing.	LS	LS	No mitigation is required.	--	--
Transportation						
Consistency with Plans and Policies Addressing Circulation System	The project would be consistent with programs, plans, ordinances, and policies addressing the circulation system.	LS	LS	No mitigation is required. The project would implement transportation design features and compliance measures to improve roadway operations to meet General Plan standards and requirements.	--	--
Vehicle Miles Traveled (VMT)	The project would generate VMT in excess of the City's applicable threshold.	PS	PS	**TRA-1** Prior to issuance of certificate of occupancy, the applicant shall install the following pedestrian and network infrastructure improvements, pursuant to the City's VMT Exchange Program as well as Safe Routes to Schools assessments that identify improvements applicable to the VMT Exchange Program, to reduce the VMT generated by the proposed project. The following improvements are listed with their total projected reduction in project VMT, as calculated by the VMT Exchange Program: • Brotherton Road/Miller Avenue – install high visibility crosswalks on the south, west, and east legs, and a curb ramp on the southwest corner (reduction of 53 VMT)	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				• Brotherton Road/Centre City Parkway – install a high visibility crosswalk on the west leg, and curb ramps on the northwest and southwest corner (reduction of 31 VMT) • Citracado Parkway/Felicita Road – install a high visibility crosswalk on all four legs (reduction of 60 VMT) • Citracado Parkway/Miller Avenue – install a high visibility crosswalk on the north leg, and curb ramps on the northwest and southeast corner (reduction of 31 VMT) • Citracado Parkway/Alexander Drive – install high visibility crosswalks on the north and south legs, and curb ramps on all four corners (reduction of 62 VMT) • Citracado Parkway/Centre City Parkway – install a high visibility crosswalk on the north leg (reduction of 15 VMT) • New sidewalk – one mile of new sidewalk equates to 303 VMT reduction. It is proposed to construct approximately 320 feet of new sidewalk on the east side of Felicita Road between Brotherton Road and the current sidewalk about 320 feet to the north. This would improve pedestrian access to the Life Care Center of Escondido and would equate to a VMT reduction of approximately 18 VMT. The project will also provide sidewalks along its frontage. However, the VMT Exchange Program does not apply towards project frontage.		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				• Near Bernardo Elementary School ○ Bernardo Avenue/Hamilton Lane – install high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Bernardo Avenue/Dexter Place – install high visibility crosswalk on the west leg (reduction of 15 VMT) ○ Mountain Heights Drive/Sunrise Way – install high visibility crosswalk on the north leg (reduction of 15 VMT) • Near Del Dios Academy of Arts and Sciences School ○ 9th Avenue/Valley Parkway - install high visibility crosswalk on all four legs (reduction of 60 VMT) ○ 9th Avenue/Auto Park Way – install high visibility crosswalk on the north, south, and west legs (reduction of 45 VMT) • Near Del Lago Academy ○ Crescent Knolls Glen/Scenic Trail Way – install high visibility crosswalk on the north and west legs (reduction of 30 VMT) ○ Citracado Parkway/Scenic Trail Way – install high visibility crosswalk on all four legs (reduction of 60 VMT) • Near Felicita Elementary School ○ 13th Avenue/Quince Street – install high visibility crosswalk on the north leg (reduction of 15 VMT) ○ 13th Avenue/Redwood Street – install high visibility crosswalk on all four legs (reduction of 60 VMT)		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				○ 13th Avenue/Tulip Street – install high visibility crosswalk on the north, east, and south legs (reduction of 45 VMT) ○ 15th Avenue/Redwood Street – install high visibility crosswalk on all four legs (reduction of 60 VMT) ○ 15th Avenue/Tulip Street – install high visibility crosswalk on the north and east legs (reduction of 30 VMT) • Near Juniper Elementary School ○ Juniper Street/Felicita Avenue/17th Avenue – install high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Juniper Street – install high visibility crosswalk at the following four locations Avenue (reduction of 60 VMT): ▪ west leg of Juniper Street/Green ▪ east leg of Juniper Street / Eldorado Drive ▪ west leg of Juniper Street/Vermont Avenue ▪ east leg of Juniper Street/Cypress Crest Terrace • Near L.R. Green Elementary School ○ Bear Valley Parkway/Canyon Road – install high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Bear Valley Parkway/Las Palmas Avenue – install high visibility crosswalk on all four legs (reduction of 60 VMT)		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				○ Casteneda Drive/Las Palmas Avenue – install high visibility crosswalk on the west and south legs (reduction of 30 VMT) ○ Casteneda Drive – install high visibility crosswalk at the L.R. Green Elementary School driveway (reduction of 15 VMT) • Near Lincoln Elementary School ○ Lincoln Avenue/Broadway – install high visibility crosswalk on the west leg (reduction of 15 VMT) ○ Lincoln Avenue/Escondido Boulevard – install high visibility crosswalk on all four (reduction of 60 VMT) • Near Miller Elementary School ○ Miller Avenue/Montview Drive – install high visibility crosswalk on the south and west legs (reduction of 30 VMT) ○ Felicita Road/Brotherton Road – install high visibility crosswalk on the east leg (reduction of 15 VMT) • Other City intersections ○ Citracado Parkway/Escondido Boulevard – install a high visibility crosswalk on the east leg (reduction of 15 VMT) ○ Auto Park Way/Hale Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Valley Parkway/Home Depot Center – install a high visibility crosswalk on the south and west legs (reduction of 30 VMT)		

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
				○ Valley Parkway/11th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ La Terraza Boulevard/9th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ 9th Avenue/Tulip Street – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Centre City Parkway/9th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ 9th Avenue/Escondido Boulevard – install a high visibility crosswalk on all four (reduction of 60 VMT) ○ Valley Parkway/Juniper Street – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Via Rancho Parkway/Quiet Hills Drive – install a high visibility crosswalk on all four legs (reduction of 60 VMT) ○ Via Rancho Parkway/Beethoven Drive – install a high visibility crosswalk on the north, east, and south legs (reduction of 45 VMT)		
Hazardous Design Features	The proposed project would not construct geometric design features or incompatible uses that would substantially increase hazards.	LS	LS	No mitigation is required.	--	--
Emergency Access	The project would not result in inadequate emergency access.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Tribal Cultural Resources						
Tribal Cultural Resources – Historical Resources	The project would not result in a substantial adverse change in the significance of a historical resource that would be considered a tribal cultural resource	N	N	No mitigation is required.	--	--
Tribal Cultural Resources – Significant Resource per Section 5024.1	Project construction could result in a substantial adverse change in the significance of a tribal cultural resource.	PS	PS	See mitigation measures CUL-1 through CUL-10, above.	LS	LS

LS = Less than Significant; PS = Potentially Significant; N = No Impact

ES.5 Project Alternatives

The following alternatives are analyzed in detail in Chapter 8.0, *Alternatives*, of this EIR. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation in the environmental review process. The considered alternatives to the proposed project are summarized below followed by a discussion of the environmentally superior alternative.

ES.5.1 Alternatives Evaluated in Detail

No Project Alternative

Under the No Project Alternative, the project would not be approved or implemented, no multi-family residential buildings or church development would be constructed, and no roadway improvements to Felicita Road would be constructed. The physical conditions of the project site would remain as they were at the time the NOP was published and the existing church would continue operation on the project site.

Reduced Density Alternative

The Reduced Density Alternative would develop a multi-family residential and church development project similar to the proposed project but would reduce the density of the residential development to decrease the severity of potential impacts of the project. The Zone Change and General Plan Amendment proposed by the project would be required to implement this alternative. Under the Reduced Density Alternative, development of the site would occur within the same footprint of the proposed project, but the number of residential dwelling units would be decreased by approximately 25 percent, for a total of 194 dwelling units. Vehicular trips under the Reduced Density Alternative would be reduced to 1,161 average daily trips and building area would be reduced by approximately 25 percent to 262,785 SF. The height of the proposed residential structures would remain three to four stories, but one to three fewer buildings would be constructed on the residential site. Other components and improvements under this alternative would be substantially the same as the proposed project, such as the new church building and associated improvements on the church site, common amenity areas, access driveways, landscaping, hardscape improvements, and utility improvements.

Reduced Footprint Alternative

The Reduced Footprint Alternative was developed to avoid development within the wetland area on the project site and incorporate a 50-foot buffer from the wetland drainage. Development would be focused on the eastern portion of the project site. Under the Reduced Footprint Alternative, 258 dwelling units would be constructed consistent with the proposed project, but the residential buildings would be concentrated more densely in the eastern portion of the residential site. The new church building and associated improvements on the church site would be the same as the proposed project. The Zone Change and General Plan Amendment proposed by the project would be required to implement this alternative. As the Reduced Footprint Alternative would construct the same number of residential dwelling units, trip generation would be the same as for the proposed project and the proposed Felicita Road widening and intersection improvements would occur. The primary entrance to the residential development from Felicita Road would be eliminated under this alternative to avoid crossing the undeveloped area and drainage that would remain at the western edge of the project site. With these exceptions, other components and improvements under this alternative would be similar to those for the proposed project,

such as the new church building and associated improvements on the church site, common amenity areas, landscaping, hardscape improvements, and utility improvements. However, to accommodate the decrease in developable area, some landscaping and useable open space area would be decreased in exchange for the open space that would remain in the western portion of the site and parking areas for the residential development would be decreased to the minimum required amount of 331 spaces. No change in the number or height of the proposed buildings would occur under this alternative.

Planned Office Land Use Alternative

The Planned Office Land Use Alternative was developed to assess potential impacts that would occur without the General Plan Amendment proposed by the project. A Zone Change would still be required to implement this alternative and revise the zoning designation to Planned Development – Office to be consistent with the General Plan land use designation. The existing land use designation of PO allows a maximum FAR of 2.0; therefore, this alternative considers demolition of the existing church and school buildings, and buildout of 1,291,995 SF of office space on the entire project site. The office buildings are assumed to be three stories in height. According to the CalEEMod defaults for the office land use, this alternative would generate 4,450 ADT. It is assumed that the office land use would be developed within the same development footprint as the proposed project and the Felicita Road widening and intersection improvements would occur. The analysis related to this alternative assumes the office land use would comply with applicable development regulations related to parking, landscape, hardscape, and height.

ES.5.2 Comparative Environmental Analysis

Detailed analysis of each alternative is provided in Chapter 8.0, *Alternatives*, of this EIR. Table ES-2, *Comparison of Project and Alternative Impacts*, provides a summary of the potential impacts that would occur under each alternative and, where the alternative would result in the same impact conclusion as the proposed project, whether the alternative would reduce, increase, or keep consistent the degree of that impact.

Table ES-2
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Environmental Topic	Proposed Project	No Project Alternative	Reduced Density Alternative	Reduced Footprint Alternative	Planned Office Land Use Alternative
Aesthetics	LS	N	LS<	LS>	LS>
Air Quality	LS	N	LS<	LS<	LS>
Biological Resources	SM	N	SM=	SM<	SM=
Cultural Resources	SM	N	SM=	SM<	SM=
Energy	LS	N	LS<	LS<	LS>
Greenhouse Gas Emissions	LS	N	LS<	LS<	LS>
Hazards and Hazardous Materials	SM	N	SM=	SM=	SM=
Land Use and Planning	LS	N	LS=	LS=	LS<
Noise	SM	N	SM<	SM=	SM>
Population and Housing	LS	N	LS<	LS=	N
Transportation	SM	N	SM<	SM=	SM>
Tribal Cultural Resources	SM	N	SM=	SM<	SM=

SM = significant but mitigable impacts; LS = less than significant impacts; N = no impacts
< represents comparatively reduced impact relative to the project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the project

ES.5.3 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the project. CEQA Guidelines Section 15126.6(e)(2) also requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the environmentally superior alternative. This alternative would avoid the significant and mitigable and less than significant impacts that would occur with the proposed project. However, the No Project Alternative does not meet any of the project objectives.

Of the remaining alternatives, the environmentally superior alternative is the Reduced Density Alternative. This alternative would meet the project objectives, although to a lesser degree than the proposed project given the reduced number of residential dwelling units that would be provided within the City. This alternative would not eliminate any potentially significant impacts of the project but would reduce the severity of impacts related to aesthetics, air quality, energy, GHG emissions, noise, population and housing, and transportation. No increase in the severity of impacts would occur under the Reduced Density Alternative and all potentially significant impacts would be mitigable below a level of significance.

1.0 INTRODUCTION

The City of Escondido (City) is the Lead Agency preparing this Environmental Impact Report (EIR) for the proposed Alexan Escondido and Bethel Baptist Church Project (project). The purpose of this EIR is to provide the decision-making body (City Council) and the general public with information concerning the environmental impacts associated with the proposed project. This EIR assesses impacts that would result with project implementation, presents mitigation measures that would avoid or reduce the level of impacts deemed to be significant, and provides alternatives that would reduce or avoid significant environmental impacts.

The proposed project consists of two components on a 14.83-acre site located at 855 Brotherton Road in the City: (1) demolition/removal of an existing church building and parking lot and the construction of 258 units of multi-family residential housing within ten buildings and a leasing/amenity building on an approximately eight-acre area in the western portion of the project site; and (2) the construction of a new church building adjacent to two existing private school buildings on an approximately seven-acre area in the eastern portion of the project site. The project would require approval of discretionary actions by the City and, therefore, is subject to the environmental review requirements of the California Environmental Quality Act (CEQA). The proposed project is described in detail in EIR Chapter 3, *Project Description*, and is analyzed within the subsequent sections of this EIR. The City, as the CEQA lead agency, has overseen the preparation of this EIR to provide decision makers, the public, trustee agencies, and responsible agencies with information about the potential environmental effects associated with the project.

1.1 Purpose and Intended Use of the EIR

As outlined in CEQA Guidelines Section 15121, an EIR is a public informational document used in the planning and decision-making process to inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to a project. This EIR analyzes the potential environmental impacts associated with project implementation. The City's Planning Commission and City Council will consider the information in this EIR, including the public comments and staff response to those comments, during the public review and hearing process. As a legislative action, the final decision would be made by the City Council, who may approve, conditionally approve, or deny the project.

The purpose of an EIR is to identify:

- The significant potential impacts of the project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated;
- Any unavoidable adverse impacts that cannot be mitigated; and
- Reasonable and feasible alternatives to the project that would avoid any significant adverse environmental impacts or reduce the impacts to a less than significant level.

An EIR also discloses potential growth-inducing impacts; impacts found not to be significant; and significant cumulative impacts of the project when taken into consideration with past, present, and reasonably anticipated future projects.

CEQA requires an EIR to reflect the Lead Agency's independent judgment. A Draft EIR is circulated to responsible and trustee agencies with resources affected by a project, and to interested agencies, groups, and individuals. Draft EIR reviewers are requested to focus on the sufficiency of the document in identifying and analyzing a project's possible environmental impacts and ways in which those might be avoided or mitigated. This EIR is being prepared as a Project-level EIR in accordance with CEQA Guidelines Section 15161, which states the following:

> The most common type of EIR examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

This EIR is an informational document that will provide the City's decision makers, public agencies, responsible and trustee agencies, and members of the public with information about: (1) the potential for significant adverse environmental impacts that would result from the project implementation; (2) feasible or potentially feasible ways to minimize significant adverse environmental impacts that would result from the project implementation; and (3) a reasonable range of potentially feasible alternatives to the project that would reduce or avoid significant adverse environmental impacts associated with the project (California Public Resources Code [PRC] Section 21002.1[a]; 14 California Code of Regulations [CCR] 15121[a]). Responsible and trustee agencies may use this EIR to fulfill their legal authority to issue permits for the project. The analysis and findings in this EIR reflect the independent judgment of the City.

This EIR was prepared in accordance with CEQA (PRC, Section 21000, et seq.), the procedures for implementation of CEQA set forth in the Guidelines for Implementation of CEQA (CCR, Section 15000, et seq.; CEQA Guidelines), and the City's environmental review procedures. The City is the Lead Agency in the preparation of this EIR, as defined by CEQA Guidelines Section 15051.

1.2 Notice of Preparation

CEQA encourages lead agencies to solicit and consider input from other interested agencies, citizen groups, and individual members of the public as early as possible in the EIR process. Pursuant to Section 15082 of the CEQA Guidelines, the City prepared and circulated a Notice of Preparation (NOP) between September 28, 2023 and October 30, 2023 to interested agencies, organizations, and parties. The NOP was sent to the State Clearinghouse (SCH) at the California Office of Planning and Research and an SCH number was assigned to this project (SCH No. 2023090610). The City also hosted a virtual EIR scoping meeting on October 11, 2023. The intent of the NOP and scoping meeting is for public agencies and interested persons or groups to provide comments regarding the scope and content of the EIR, including but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed.

The meeting was attended by City staff, project applicant representatives and consultants and approximately 15 interested members of the public. Comments received during the NOP public scoping period were considered as part of the preparation of this EIR. Comments addressed numerous topics, including aesthetics, transportation, land use, biological resources, cultural resources, air quality, greenhouse gas (GHG) emissions, noise, public services and utilities, public safety, hazardous materials, water quality, and flooding. Table 1-1, *Summary of Written Comments on Notice of Preparation*, summarizes the comments received from agencies/persons during the NOP process and provides a

reference, as applicable, to the EIR section(s) where the issues are addressed. The NOP and comment letters are provided in Appendix A, *Notice of Preparation and NOP Comments*, of this EIR.

Table 1-1
SUMMARY OF WRITTEN COMMENTS ON NOTICE OF PREPARATION

Commenter	Comment Summary and EIR Section(s) where Addressed
Federal Agencies	No federal agencies provided comments on the NOP.
State Agencies	
Native American Heritage Commission	**Archaeological and Tribal Cultural Resources:** Follow established procedures; contact all tribes traditionally and culturally affiliated with geographic area; comply with Assembly Bill (AB) 52 Tribal consultation requirements; and recommendations for cultural resources assessment. Refer to Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources.*
California Department of Transportation (**Caltrans**)	**Transportation:** Include the following items in transportation analysis: • Evaluate vehicle miles traveled (VMT) per latest Governor's Office of Planning and Research guidance. • Project safety or operational issues on or adjacent to State facilities. • Alternative transportation. • Smart growth. Refer to Section 4.11, *Transportation.* **Noise:** Notice that Caltrans is not responsible for traffic noise impacts on the project site from Interstate 15 (I-15). **General:** • Acknowledgement that Caltrans could be a Responsible Agency under CEQA. • An encroachment permit may be required from Caltrans. • Provision of reliable, high-speed broadband for project occupants to support travel demand management.
Local Agencies	
Rincon del Diablo Municipal Water District	**Utilities:** The project site is located within the Rincon del Diablo Municipal Water District's Improvement District 1 and will provide potable water to the project. Requests review of the Tentative Map. Refer to Chapter 6, *Effects Found Not to be Significant.*
North County Transit District	**Air Quality and GHG Emissions:** Requests incorporation of critical transit infrastructure designs into the project.

Commenter	Comment Summary and EIR Section(s) where Addressed
Organizations	
San Diego Archaeological Society	**Cultural Resources:** Supports inclusion of cultural resources as one of the environmental issues to evaluate in the EIR. Requests notification of public review and provision of cultural resources reports for review. Refer to Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources.*
Individuals	
Ayo, Sharon	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Noise:** Concerns about noise. Refer to Section 4.9, *Noise*. **General**: Concerns about parking and property values.
Braden, Susan	**Traffic and Utilities**: Concerns about inadequate infrastructure in the project area to support the project. Refer to Section 4.11, *Transportation,* and Chapter 6, *Effects Found Not to be Significant.*
Burnham, Nancy	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Air Quality:** Concerns about air quality impacts from traffic. Refer to Section 4.2, *Air Quality*. ***Public Safety:*** Concerns about evacuation during emergency. Refer to Chapter 6, *Effects Found Not to be Significant.* **Biological Resources**: Concerns about impacts to wildlife. Refer to Section 4.3, *Biological Resources.* **Noise:** Concerns about noise. Refer to Section 4.9, *Noise*. **Aesthetics:** Concerns about light impacts. Refer to Section 4.1, *Aesthetics.* **Global Warming:** Concerns about effect on global warming. Refer to Section 4.6, *Greenhouse Gas Emissions.*
Carter, Orval and Terri	General opposition to the project.
Castaneda, Annette	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Hazardous Materials**: Concerns about contamination of nearby farming uses. Refer to Chapter 6, *Effects Found Not to be Significant.* **Population and Housing**: Concerns that additional residential rental units are not needed. **General**: Concerns about the lack of recreational space in the community.
Castro, Ascension	General opposition to the project.

Commenter	Comment Summary and EIR Section(s) where Addressed
Clark, Sharon	General opposition to the project.
Cowell, Brad	General opposition to the project.
Crutchfield, Matt	General opposition to the project.
Crutchfield, Rebecca	General opposition to the project.
Daniels, Vicky	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Dorin, Shirin	**General**: Request for project information.
Doucette, Dirk	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Finch, Christopher	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.*
Franco, David	**General**: Request for project information.
Hanson, Ron (1)	General opposition to the project.
Hanson, Ron (2)	General opposition to the project.
Hernandez, Nelson	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Land Use**: Concerns about the project's consistency with zoning and General Plan policies. Refer to Section 4.8, *Land Use and Planning*. **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **General:** Requests clarification of project numbers.
Hunton, Mike	General opposition to the project.
Isaac, Jim Mac	**Public Services:** Concerns about school capacity, parks and open space, and fire services. Refer to Chapter 6, *Effects Found Not to be Significant.* **Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.*
Jester, Jeff and Patti	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.*

Commenter	Comment Summary and EIR Section(s) where Addressed
Jimenez, Ryan and Kelly	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Public Services:** Concerns about school capacity. Refer to Chapter 6, *Effects Found Not to be Significant.* **Flooding**: Concerns about flooding in the project area and potential for traffic to exacerbate flood conditions during storms. Refer to Chapter 6, *Effects Found Not to be Significant* and Section 4.7, *Hazards and Hazardous Materials.* **Biological Resources**: Concerns about impacts to wildlife. Refer to Section 4.3, *Biological Resources.* **General**: Concerns about increased criminal activity.
Keinath, Pam	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.*
Kellenbarger, Patricia	**Public Utilities and Services:** Concerns about water supply and school capacity. Refer to Chapter 6, *Effects Found Not to be Significant.*
Kim, Grace	General opposition to the project.
Landers, Joy	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school, as well proximity to transit facilities. Refer to Section 4.11, *Transportation.* **Biological Resources**: Concerns about impacts to wildlife. Refer to Section 4.3, *Biological Resources.* **General**: Concerns about affordability, property values.
Lim, Stephanie	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Noise:** Concerns about noise. Refer to Section 4.9, *Noise*.
Losey, Brandon	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Lux, JoAnne	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.*

Commenter	Comment Summary and EIR Section(s) where Addressed
Mahler, Teresa	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Public Services:** Concerns about school capacity. Refer to Chapter 6, *Effects Found Not to be Significant.*
Marlin, Wade	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Public Utilities and Services:** Concerns about water supply, sewer service, electrical service, and school capacity. Refer to Chapter 6, *Effects Found Not to be Significant.* **Water Quality:** Concerns about polluted runoff and effects on San Dieguito River. Refer to Chapter 6, *Effects Found Not to be Significant.* **Land Use**: Concerns about the project's consistency with zoning. Refer to Section 4.8, *Land Use and Planning*.
Martin, Mike	General support for the project.
Martinez, Kevin	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **General:** Concerns about parking in adjacent neighborhoods.
Martinez, Marie	**General**: Questions about parking and recreational facilities.
Metzger, Terri	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Odette, Sienna	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.*
Rogel, Omar	General opposition to the project.
Rubalcava, Jose	**General**: Questions about project location and leasing information.
Saputo, Anthony	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Land Use**: Concerns about the project's consistency with zoning. Refer to Section 4.8, *Land Use and Planning*. **General:** Concerns about property values.
Savedra, Amy	**Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Stanikzai, Noorullah	**General**: Questions about leasing information.

Commenter	Comment Summary and EIR Section(s) where Addressed
Sylliaasen, Teresa	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **General:** Concerns about increased crime.
Szem, Dennis	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Flooding**: Concerns about flooding and property damage. Refer to Chapter 6, *Effects Found Not to be Significant.*
Testa, Elizabeth	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **General:** Concerns about parking in adjacent neighborhoods.
Testa, Nick	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.* **Public Services:** Concerns about school capacity. Refer to Chapter 6, *Effects Found Not to be Significant.*
Theriault, Christine	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.*
Ulaszek, Renee	**Traffic:** Concerns about project-generated traffic and impacts on surrounding streets and safety given the nearby school. Refer to Section 4.11, *Transportation.* **Air Quality:** Concerns about air quality impacts from traffic. Refer to Section 4.2, *Air Quality*. ***Public Safety:*** Concerns about evacuation during emergency. Refer to Chapter 6, *Effects Found Not to be Significant.*
Velasquez, Pedro	**Traffic:** Concerns about construction traffic and impacts on surrounding streets. Refer to Section 4.11, *Transportation.* **Air Quality:** Concerns about dust generated during project construction and associated health effects. Refer to Section 4.2, *Air Quality*. **General:** Concerns about safety and privacy during project construction.

Commenter	Comment Summary and EIR Section(s) where Addressed
Valdez, John	**Aesthetics:** Concerns about project impacts on existing visual character and quality. Refer to Section 4.1, *Aesthetics.* **Traffic:** Concerns about project-generated traffic and impact on surrounding streets. Refer to Section 4.11, *Transportation.*

1.3 Scope of the EIR

This EIR provides a detailed description of the proposed project (Chapter 3, *Project Description*) and the environmental review conducted for the proposed project (Chapter 4, *Environmental Analysis*). Based on the preliminary analysis during the scoping process, it was determined that implementation of the proposed project would not have an adverse effect on the following environmental issues:

- Agriculture and Forestry Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

In accordance with CEQA Guidelines Section 15128, a brief explanation indicating the reasons that the effects on these resources would not be significant is provided in Chapter 6, *Effects Found Not to be Significant*.

The following environmental issue areas were identified for the proposed project as being potentially significant based on the scoping process and are addressed in this EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- GHG Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Transportation
- Tribal Cultural Resources

Detailed environmental analysis was conducted for these issue areas, and the results are presented in Chapter 4, *Environmental Analysis* (Sections 4.1 through 4.12).

1.4 Organization and Content of the EIR

Pursuant to the CEQA Guidelines Section 15120(c), this EIR contains the information and analysis required by CEQA Guidelines Sections 15122 through 15131. Each of the required elements is covered in one of the EIR chapters and appendices, and the EIR is organized as follows:

- **Executive Summary** (CEQA Guidelines Section 15123): Provides a summary of the EIR and a brief description of the project; identifies areas of controversy and issues to be resolved by the decision-makers; and includes a summary table identifying significant impacts, proposed mitigation measures, and the significance of the impact after mitigation. A summary of the project

alternatives and a comparison of the potential impacts of the alternatives with those of the project are also provided.

- **Chapter 1, Introduction:** Contains an overview of the legal authority, purpose, and intended uses of the EIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.

- **Chapter 2, Environmental Setting** (CEQA Guidelines Section 15125): Provides a description of the project's regional context, location, and existing physical characteristics and land uses, as well as overview of available public infrastructure and services.

- **Chapter 3, Project Description** (CEQA Guidelines Section 15124): Provides a detailed discussion of the proposed project, including project objectives, project characteristics, anticipated construction activities, and a list of required discretionary actions.

- **Chapter 4, Environmental Analysis** (CEQA Guidelines Section 15126): Provides a detailed evaluation of potential environmental impacts associated with the proposed project for environmental issues determined through the initial review and public scoping processes to be potentially significant. The analysis of each issue includes a discussion of existing conditions, regulatory setting, significance determination thresholds, methodology and assumptions, and an evaluation of potential impacts. If significant impacts are identified, feasible mitigation measures to avoid or reduce significant impacts are identified. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is provided.

- **Chapter 5, Cumulative Impacts** (CEQA Guidelines Section 15130): Provides a detailed discussion of the proposed project's cumulative impacts. Per CEQA Guidelines Section 15065(a)(3), a project's impacts are "cumulatively considerable" when the incremental effects of an individual project are considerable when viewed in connection with the effect of past projects, the effects of other current projects, and the effects of probable future projects.

- **Chapter 6, Effects Found Not to be Significant:** Identifies the issues determined in the initial scoping and environmental review process to be not significant for the project, and briefly summarizes the basis for these determinations.

- **Chapter 7, Other CEQA Considerations:** A discussion of significant irreversible environmental changes, significant unavoidable impacts, and growth-inducing effects.

- **Chapter 8, Alternatives** (CEQA Guidelines Section 15126.6): This chapter provides a description of the alternative evaluation process, as well as a description of alternatives considered but eliminated from further analysis and the rationale thereof. This chapter also includes an analysis and assessment of impacts for alternatives retained, including the No Project Alternative and the Environmentally Superior Alternative.

- **Chapter 9, References**: Lists the reference materials cited in the EIR.

- **Chapter 10, List of Preparers** (CEQA Guidelines Section 15129): Identifies Lead Agency staff and CEQA consultants that contributed to the preparation of this EIR.

- **Appendices:** The appendices include the NOP, comments received in response to the NOP, and technical studies prepared for the project.

1.5 Environmental Review Process

1.5.1 Draft EIR

The City, as the CEQA lead agency, is responsible for the preparation and review of this EIR. In accordance with CEQA Guidelines Section 15105, the Draft EIR is being distributed for review to the public and interested and affected agencies for a review period of at least 45 days.

Public review of the Draft EIR is intended to focus "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204). The Notice of Completion of the Draft EIR was filed with the State Clearinghouse as required by CEQA Guidelines Section 15085. In addition, the Notice of Availability of the Draft EIR was distributed pursuant to CEQA Guidelines Section 15087.

Interested agencies and members of the public are invited to provide comments on the Draft EIR analysis and content to the City. Comments should be submitted in writing during the public review period to:

Ivan Flores, AICP Principal Planner
City of Escondido, Planning Division
201 North Broadway
Escondido, CA 92025
or via email to: Ivan.Flores@escondido.gov

The Draft EIR and related technical studies are available for review during the public review period at the following locations:

- Escondido City Hall Planning Division: 201 N. Broadway, Escondido, California 92025
- Escondido City Library: 272 E. Via Rancho Parkway, Space 171, Escondido, California 92025
- City of Escondido project website: https://www.escondido.gov/259/Alexan-Escondido-and-Bethel-Baptist-Chur

1.5.2 Final EIR

Following the end of the public review period, the City, as lead agency, will review comments received and prepare written responses to the comments per CEQA Guidelines Section 15088. The Final EIR will incorporate the comments and responses and, if applicable, resulting changes to the EIR. Additionally, a Mitigation Monitoring and Reporting Program (MMRP) and Findings of Fact will be prepared and compiled as part of the EIR finalization process. The City will then consider certification of the Final EIR (CEQA Guidelines Section 15090). If the Final EIR is certified, the City may consider the project approval (CEQA Guidelines Section 15092).

When deciding whether to approve the project, the City will use the information provided in the Final EIR to consider potential impacts to the physical environment. The City will also consider all written comments received on the Draft EIR during the public review period in making its decision to certify the Final EIR as complete and compliant with CEQA and in making its determination whether to approve or deny the project. If the project is approved, the City will file a Notice of Determination with the State Clearinghouse and San Diego County Clerk within five working days after project approval pursuant to CEQA Guidelines Section 15094.

2.0 ENVIRONMENTAL SETTING

This chapter briefly describes the existing conditions at the project site. Further descriptions of the environmental setting related to individual environmental resources are provided in the applicable sections of Chapter 4, *Environmental Analysis*. In accordance with Section 15125 of the CEQA Guidelines, the baseline conditions described herein reflect the environmental setting at the time the NOP was released in September 2023.

2.1 Regional Setting

The project is in the southern portion of the City. The City encompasses approximately 80 square miles in northern San Diego County (County), approximately 30 miles north of downtown San Diego, and 18 miles east of the Pacific Ocean. Figure 2-1, *Regional Location*, shows the project's location within the County. The City is generally situated in a valley at approximately 615 feet above mean sea level (AMSL) and surrounded by rolling hills and rugged terrain ranging up to 4,200 feet AMSL. Escondido is bounded on the north by the unincorporated communities of Valley Center and Hidden Meadows, on the west by the City of San Marcos, on the south by Lake Hodges and the City of San Diego, and on the east by unincorporated San Diego County. I-15 bisects Escondido in a north-south direction and State Route (SR) 78 transitions from freeway to surface streets in an east-west direction through the community. The project site is approximately 120 feet east of I-15 and approximately 2.4 miles south of SR 78.

The project area is situated in the western foothills of the Peninsular Ranges and within the coastal plain of the County. The elevation in the project area ranges from approximately 600 to 670 feet AMSL. The Peninsular Ranges rise rapidly to an elevation of 6,142 feet AMSL at Palomar Mountain, approximately 19 miles northeast of the project area. Figure 2-2, *United States Geological Survey (USGS) Topography*, depicts the topographic characteristics of the project area. The Upper Escondido Creek is located approximately two miles to the north, the San Dieguito River is approximately three miles to the south, and Lake Hodges Reservoir is located approximately three miles to the southwest. The Pacific coastline is approximately 13 miles west of the project area.

Geologically, the project area is underlain by granitic bedrock of the middle Cretaceous age Woodson Mountain Granodiorite Formation. One soil series, the Placentia series, is mapped for the project site. This series, which consists of moderately well-drained sandy loams that have a sandy clay subsoil, forms in granitic alluvium. The soil of this series mapped in the project area is Placentia sandy loam, thick surface, 2 to 9 percent slopes. This soil is gently to moderately sloping with a 20- to 30-inch surface layer.

The project site is located in a developed area with a mixture of land uses primarily comprised of residential neighborhoods. Churches, schools, fire stations, and health care facilities occur along Felicita Road in the project area. Other commercial uses such as a farm stand with crop fields, veterinary clinics, an office building, as well as churches occur in the project area along Citracado Parkway. Residential development is mostly single-family homes with some multi-family developments to the east along Brotherton Road and Citracado Parkway.

2.2 Project Site

The project site, which is located at 855 Brotherton Road within the southern portion of the City, consists of two parcels (Assessor's Parcel Number [APN] 236-333-41-00 and APN 236-333-53-00) that encompass a total of 14.83 acres. The western portion of the site (approximately eight acres) is proposed for residential development and the eastern portion of the site (approximately seven acres) is proposed for the new church.

The project site is bounded by Felicita Road to the west; Brotherton Road to the north; single-family homes (along Miller Avenue) to the east, and single-family homes along Palm Terrace and agricultural uses along Miller Avenue to the south. I-15 is approximately 120 feet to the west of the site. Figure 2-3, *Project Vicinity*, pictures the conditions of the project site and surrounding areas.

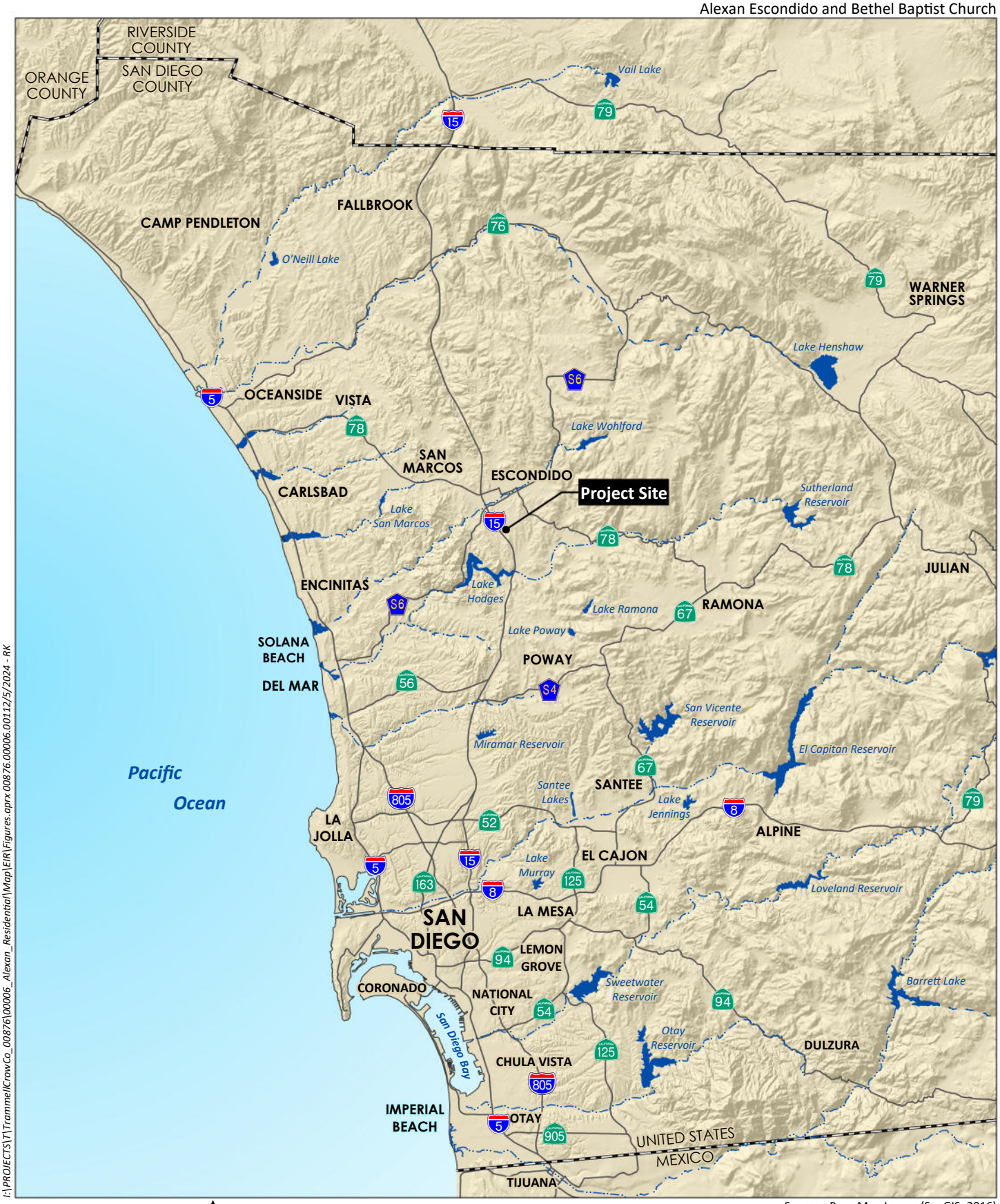
Landforms within the project site and vicinity are characterized by relatively flat terrain. Vegetated embankments occur along the edges of the nearby I-15 freeway corridor. Within the project site, the developed area occurs on a development pad in the central portion of the site that lies approximately 10 to 15 feet higher than the rest of the site. The project site is relatively level with a slight topographical variation as it slopes to the south to the degree of approximately 10 feet. Existing on-site elevations range from approximately 600 to 670 feet AMSL.

The project site is currently developed with a church building, two private education buildings, and surface parking on an elevated building pad. The church building encompasses 24,395 square feet (SF) and was constructed in 1976. The church is a one- and two-story building constructed primarily of reinforced precast concrete on a concrete slab with some cast-in-place elements. The building is wedge-shaped and oriented on a northwest to southeast axis. A single-story L-shaped element occurs along the south and east facades that converge to a point at the southeast corner. The north and west facades curve toward the main entry element and steeple at the northwest corner, and the facades of the main portion of the church are two stories.

Two, two-story education buildings are located east of the church building, separated by a landscaped area. The concrete block buildings are rectangular in shape, parallel to Brotherton Road and to each other, and are separated by a courtyard. The northerly building was built in 1982 and encompasses 7,576 SF. The southerly building was built in 1993 and encompasses 7,370 SF. Playgrounds and associated equipment/structures occur in the eastern portion of the site, adjacent to the education buildings. A basketball court also occurs in the southeastern portion of the site. Surface parking lots are located on the north, west, and south sides of the existing church and educations buildings.

The site also contains a drainage swale, dirt/vegetated fields, and utility infrastructure, including a groundwater well, utility boxes, and lighting. Access to the project site is currently provided via three driveways along Brotherton Road. The site was primarily used for agriculture from approximately 1939 until it was developed with the church in the 1970s.

The project site supports five vegetation communities or land use types, including urban/developed, disturbed, non-native grassland, emergent wetland, and ornamental vegetation communities and land cover types. Urban/developed land cover type includes the developed portion of the site where the church, education buildings, playgrounds, and parking areas are present. Disturbed land cover type is located just west of the parking lot on the west side of the existing church building. Non-native grassland occurs in the western, southern, and eastern portions of the site where the grass fields are present.



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Figures.aprx 00876.00006.00112/5/2024 - RK

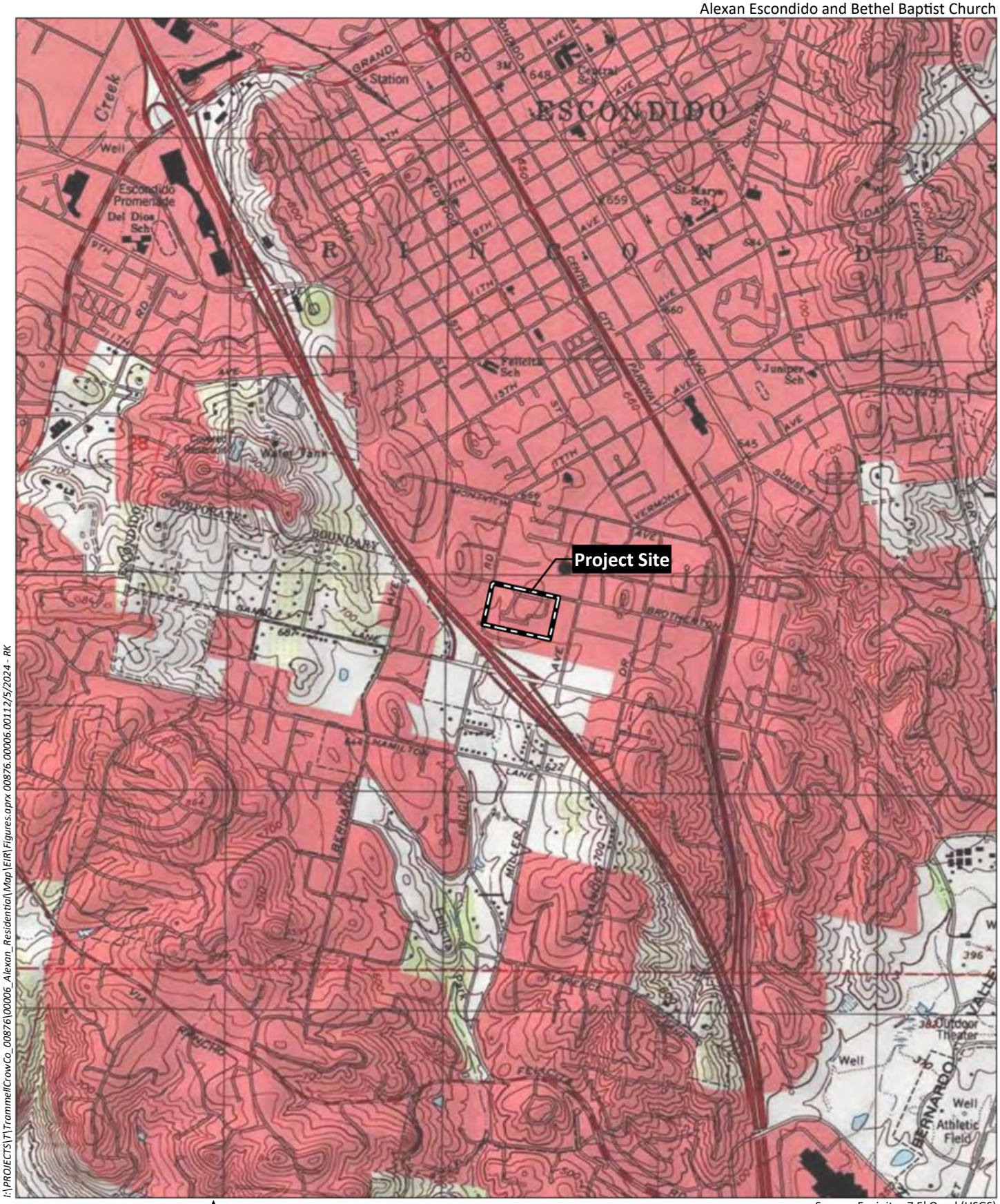
0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 2-1



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Figures.aprx 00876.00006.00112/5/2024 - RK

0 2,000 Feet

Source: Encinitas 7.5' Quad (USGS)

HELIX Environmental Planning

USGS Topography

Figure 2-2



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Figures.aprx 00876.00006.00112/5/2024 - RK

0 500 Feet

Source: Aerial (SanGIS 2023)

HELIX Environmental Planning

Project Vicinity

Figure 2-3

Emergent wetland occurs within the drainage channel that traverses the western portion of the site in a north-south alignment. Ornamental vegetation occurs in the northern portion of site along the Brotherton Road frontage, as well as a small area of trees along the southern boundary of the site.

The project site is underlain with fill materials at depths ranging from approximately 2 to 13 feet, with Granitoid bedrock formational materials beneath the fill. Groundwater is anticipated to be 40 to 50 feet below the existing grade. The project site is not located within mapped floodplains/flood hazard areas or Alquist-Priolo fault zones.

The project site has a land use designation of Planned Office (PO) in the City of Escondido General Plan (City 2012a). This designation is intended to provide office development to enhance employment opportunities. The project site is zoned Residential Estates (RE-20, 20,000 SF minimum lot size), which provides for single-family dwellings in an estate setting.

2.3 Surrounding Land Uses

Land uses surrounding the project site include single-family residences and an elementary school to the north along Brotherton Road, with a nursing home, additional single-family residences, and a church beyond; church/private school buildings (associated with church), single-family homes and a small orchard to the east along Miller Avenue, with additional residential neighborhoods further to the east; single-family homes along Palm Terrace and agricultural uses to the south (Farm Stand West and associated crop fields), with undeveloped land, single-family homes, fire stations, churches, and an assisted living facility further to the north; and single-family homes to the west.

Parcels to the north and east of the project site are designated PO and Suburban (S) and zoned R-E and Single-Family Residential (R-1). Parcels to the south are designated PO and zoned R-E. Parcels to the west are designated Estate II (E2) and zoned R-E. High-density housing and urban development land uses are located further north and east of the project site.

2.4 Planning Context

2.4.1 2025 Regional Plan

The 2025 Regional Plan (SANDAG 2025) is a comprehensive plan adopted by SANDAG that provides the framework for a is a long-range plan for transportation, land use, housing, and the environmental needs of the San Diego region. It provides a roadmap for how the region will develop over the next 25 years and how investments will be made in transportation infrastructure that provides more convenient and safe choices for getting around. It combines the Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS), and Regional Comprehensive Plan (RCP). As such, the 2025 Regional Plan must comply with specific state and federal mandates, including an SCS per SB 375 that achieves GHG emission reduction targets set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process.

The 2025 Regional Plan envisions a sustainable and resilient future for the region and economy supported by a transportation network that is convenient, equitable, healthy, and safe. To accomplish this, the objectives of the Regional Plan include:

- Focus population and employment growth to protect sensitive habitat and natural resource areas.
- Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.
- Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.
- Provide transportation investments and a land use pattern that promotes social equity.
- Provide transportation investments and a land use pattern that improves air quality.
- Provide multimodal access to employment centers and key destinations for all communities.
- Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

The 2025 Regional Plan has a horizon year of 2050, and projects regional growth and the construction of transportation projects over this period. The project vicinity is identified as being in a microtransit area.

2.4.2 City of Escondido General Plan

California Government Code Section 65300 requires each planning agency to prepare and adopt a comprehensive, long-term General Plan for the physical boundaries that bear relationship to its planning area. The General Plan is a statement of long-range public policy to guide the use of private and public lands within a community's boundaries. The plan is both general and comprehensive in that it provides broad guidelines for development in the city while addressing a wide range of issues that will affect the city's desirability as a place to live, work, and play. The elements of the City of Escondido General Plan (General Plan) are Land Use and Community Form, Mobility and Infrastructure, Housing, Community Health and Services, Community Protection, Resource Conservation, Growth Management, Economic Prosperity, and Implementation Program.

As indicated above, the project site is designated as PO per the General Plan Land Use Element. The PO designation allows office uses that integrate into master planned areas through pedestrian-friendly design. The following information regarding PO is excerpted from the General Plan:

- General Description of Uses: Biotechnology, research and development, corporate office and related support office uses in a campus-like setting. Limited support retail and service uses, such as restaurants, dry cleaners, gym/fitness centers, markets, and office services (e.g., printing, copying, shipping) as well as compatible public uses are also appropriate if integrated into larger facilities.
- Recommended Urban Form Characteristics: Designed to integrate multiple buildings into a master planned development with a unifying theme that is identifiable as a distinct place. Buildings designed to promote pedestrian activity with public and semi-public outdoor spaces.
- Maximum lot size: None.

- Building Height: 1-3 stories.
- Maximum Intensity: 2.0 floor area ratio (FAR)
- Zoning: Planned Development (P-D)

2.4.3 Escondido Zoning Ordinance

The City's zoning ordinance, provided in Chapter 33 of the Escondido Municipal Code, is the primary way that the City administers the General Plan. The General Plan identifies general land use designations, while the zoning ordinance identifies specific uses and development standards within these land use designations. The purpose of the zoning ordinance is to serve the public health, safety, comfort, convenience, and general welfare through regulations and standards for development.

The zoning ordinance establishes development regulations for specific land uses, identified by zones, as well as overlay areas established in the General Plan, such as open space and floodplain areas. Additionally, some portions of the municipal code apply to all areas of the City, regardless of zone, such as Article 55, the Grading and Erosion Control Ordinance. The purpose of this article is to ensure that development occurs in a manner that protects the natural and topographic character and identity of the environment; the visual integrity of hillsides and ridgelines; sensitive species and unique geologic/geographic features; and the health, safety, and welfare of the general public by regulating grading on private and public property and providing standards and design criteria implementing best management practices to control storm water and erosion during all construction activities for all development.

The City's zoning code identifies the proposed project site R-E with minimum lot size of 20,000 SF (RE-20). This zone is intended to "provide for single-family dwellings in an estate setting." Allowed uses include detached single-family dwellings, mobile homes alone on the parcel, and small day care centers. Religious facilities and schools are allowed in the R-E zone with a CUP.

Chapter 33 of the municipal code also contains environmental quality regulations (Sections 33-920 through 33-927) that implement CEQA and the CEQA Guidelines by applying the provisions and procedures contained in CEQA to development projects proposed within the City. These regulations provide standards, criteria, and thresholds for preparation of various CEQA document types, such as Categorical Exemptions, Negative Declarations, Mitigated Negative Declarations, and EIRs. Mitigation and reporting requirements, noticing, and responsibilities are also specified in the environmental quality regulations.

2.4.4 North County Multiple Habitat Conservation Program

The Multiple Habitat Conservation Program (MHCP) is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in northwestern San Diego County in accordance with the Natural Community Conservation Planning Act. The program area encompasses the cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. Its goal is to conserve approximately 19,000 acres of habitat for the protection of more than 80 rare, threatened, or endangered species. When completed, the habitat preservation areas are intended to serve as a key

component of the San Diego region's smart growth efforts by preserving habitat and open space and by directing forecasted growth into appropriate areas.

The MHCP Subregional Plan and associated Environmental Impact Statement/EIR were adopted and certified by the SANDAG Board of Directors on March 28, 2003. Each city within the MHCP plan area must subsequently adopt subarea plans and implement agreements with the California Department of Fish and Wildlife (CDFW) and the United States (U.S.) Fish and Wildlife Service (USFWS) for incidental take of covered species. The draft Escondido MHCP Subarea Plan has not been approved by the City. At full implementation, the draft Escondido MHCP Subarea Plan would conserve a total of 6,570 acres of natural habitats within the proposed preserve area. As the draft Escondido MHCP Subarea Plan has not been approved, no federal or state authorization for incidental take of sensitive species is provided under the MHCP for projects in the City; however, the draft Escondido MHCP Subarea Plan provides a guide to sensitive biological resources in the City and a vision for habitat preservation. The project site is mapped as developed land and located outside of areas targeted for conservation in the MHCP and draft Escondido MHCP (City 2001; SANDAG 2003).

This page intentionally left blank

3.0 PROJECT DESCRIPTION

This chapter of the EIR provides a statement of the project goals and objectives, describes the specific characteristics of the project, discusses project phasing and construction, and identifies the discretionary actions required to implement the project. This chapter has been prepared pursuant to Section 15124 of the State CEQA Guidelines, which requires a project description to contain: (1) the precise location and boundaries of a project site; (2) a statement of objectives sought by a project including the underlying purpose of the project; (3) a general description of a project's characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

3.1 Project Location

The project site, which is located at 855 Brotherton Road within the southern portion of the City, consists of two parcels (APN 236-333-41-00 and APN 236-333-53-00) that encompass a total of 14.83 acres. The western portion of the site (approximately eight acres) is proposed for residential development and is referred to herein as the "residential site." The eastern portion of the site (approximately seven acres) is proposed for the new church and is referred to herein as the "church site." The project site is bounded by Felicita Road to the west; Brotherton Road to the north; single-family homes (along Miller Avenue) to the east, and single-family homes along Palm Terrace and agricultural uses along Miller Avenue to the south (see Figure 2-3, *Project Vicinity*). The project site is developed with a church building, two private school education buildings, playgrounds, and a basketball court, and surface parking on an elevated building pad. The project site also contains a drainage swale, dirt/vegetated fields, and utility infrastructure. The surrounding area consists of single-family residences to the west; single-family residences, a nursing home, and Miller Elementary School to the north; single-family residences and a small orchard to the east; and single-family residences and agriculture uses to the south. I-15 is approximately 120 feet to the west of the site.

3.2 Project Objectives

CEQA requires that an EIR contain a "statement of the objectives sought by the proposed project." Under CEQA, a "clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations. The statement of objectives should include the underlying fundamental purpose of the project" (CEQA Guidelines Section 15124(b)). The general purpose of the project is to construct new residential infill development that includes affordable housing to help meet the current demand for housing in the City and region, as well as construct a new church building for the continued use of the church and private school. The following specific objectives have been identified for the proposed project:

1. Address the City's housing supply needs by providing for the development of a mix of housing units to maximize the advantages of locating new infill housing near existing regional transportation facilities with convenient freeway access.

2. Provide an environmentally sustainable residential development through the implementation of features such as energy conservation, sustainable landscape, water conservation, and support for alternative transportation, consistent with the City's Climate Action Plan (CAP).
3. Provide a diverse range of high-quality rental housing that will offer a mix of unit types, sizes, and levels of affordability to accommodate a range of potential residents.
4. Provide for the construction of housing that is consistent with the City of Escondido 2019-2029 Housing Element to assist the City in satisfying its Regional Housing Needs Allocation (RHNA) for both market rate and below market rate housing units.
5. Subdivide an underutilized site to provide both market rate and affordable housing.
6. Provide a new modern church facility on the site that integrates with the existing education buildings to allow for the continued use of the church and private school.

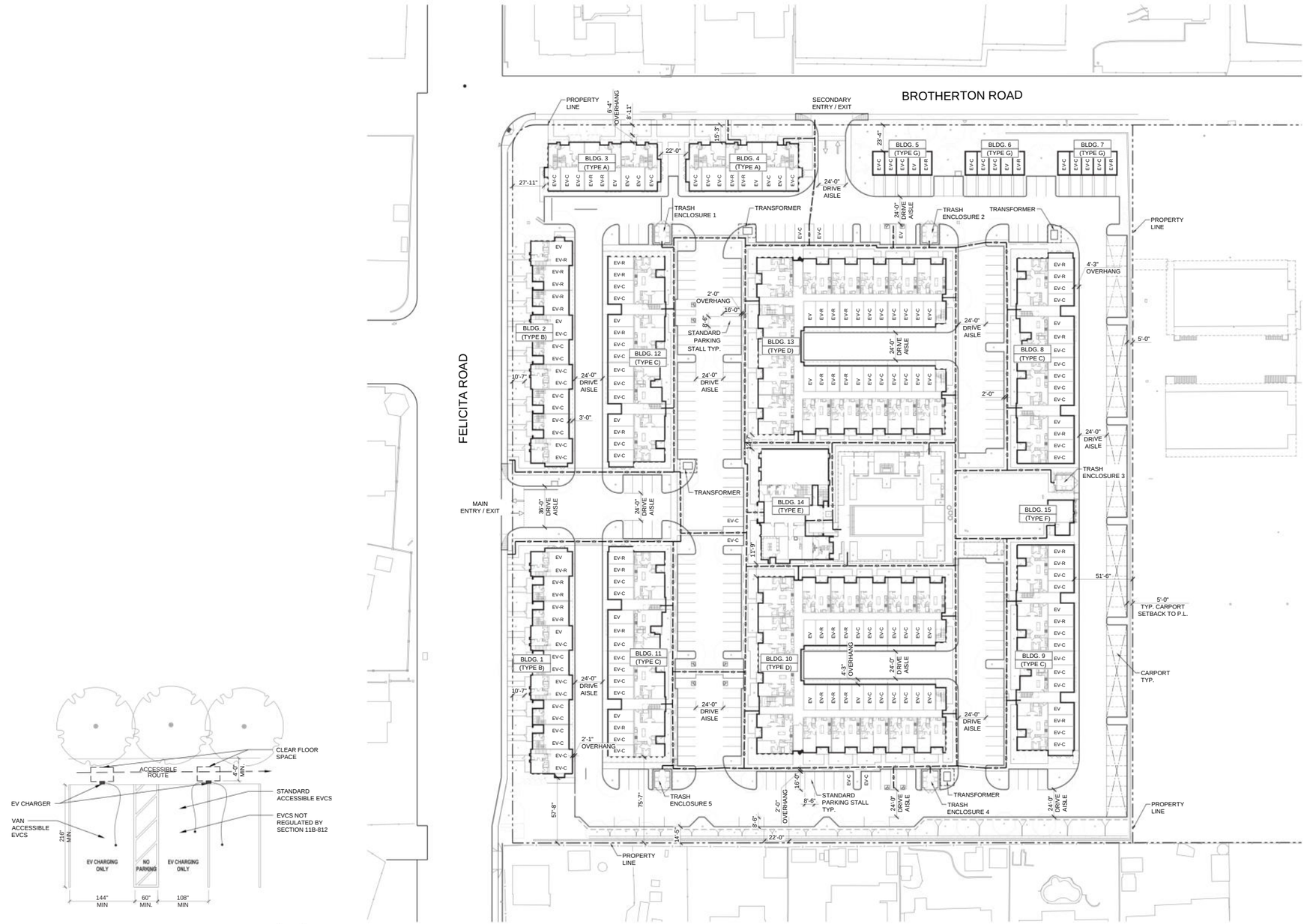
3.3 Project Characteristics

The proposed project entails the construction of a multi-family residential development (Alexan Escondido), a new church building (Bethel Baptist Church), and associated improvements on a developed site with an existing church facility and private school. Figure 3-1, *Alexan Escondido Site Plan*, and Figure 3-2, *Bethel Baptist Church Site Plan*, show site plans of the proposed project. Specific project components of the proposed residential and church developments are described below. The project would require a General Plan Amendment, Zone Map Amendment, Major Plot Plan and Design review permit for construction of Alexan Escondido, and modification to an existing Conditional Use Permit and Design Review Permit for the Bethel Baptist Church. The General Plan Amendment and Zone Map Amendment would apply to both parcels comprising the project site. The project also includes a Density Bonus Request and certain incentives/concessions and waivers as permitted by State Density Bonus Law; a Grading Exemption to exceed design criteria stipulated in Article 55 (Grading and Erosion Control) of the Escondido Zoning Code; and an Adjustment Plat to adjust the property boundaries.

3.3.1 Alexan Escondido Residential Development

The proposed residential development includes 258 multi-family apartments within 10 buildings with a mix of one- to three-bedroom units. It is anticipated that 13 (5% very low-income) of the residential units will be affordable. The residential buildings would include four different building types, each with a different form and combination of units. The unit mix would include 112 one-bedroom units ranging in size from approximately 700 to 800 SF, 122 two-bedroom units ranging between approximately 1,000 and 1,600 SF, and 24 three-bedroom units between 1,600 and 1,800 SF. The total residential gross building area would encompass approximately 350,380 SF. A summary of proposed residential development is provided in Table 3-1, *Residential Development Summary*.

Type A buildings would be approximately 100 feet long by 50 feet wide and would consist of three stories at a height of approximately 38 feet that would contain six, two- to three-bedroom units, for a total of 12,989 SF. One- and two-car garages would be located on the first floor along with a bedroom (only in the three-bedroom units). The second floor would contain the kitchen and living areas, and the third floor would contain bedrooms. A total of two Type A buildings would be constructed along the northern portion of the project site. Figure 3-3, *Residential Building Elevations – Type A*, shows a colored rendering of Type A building elevations.



LEGEND

	PROPERTY LINE
	ADA PATH OF TRAVEL
EV-C	EV CAPABLE STALLS
EV-R	EV READY STALLS
EV	EV CHARGER STALLS

NOTE :

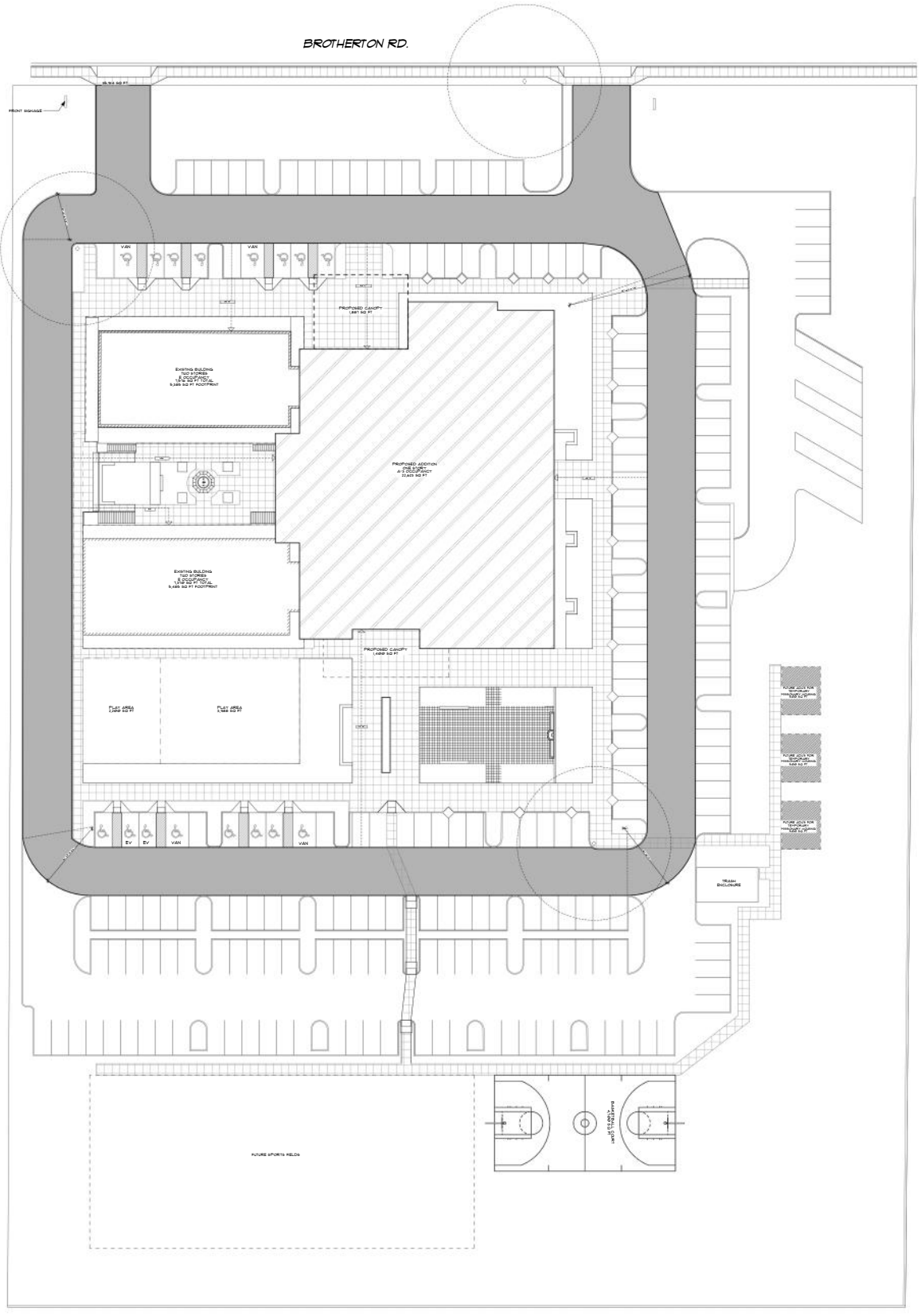
1. EXISTING OVER HEAD UTILITIES AND POLES TO BE UNDERGROUNDED, REFER TO CIVIL DRAWINGS.

TYP. EV. PARKING STATION 2

SITE PLAN 1

I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-1_SitePlan.indd 00876.00006.001 11/15/24-RK

Source: adc 2024



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-2_ChurchRedevelopment.indd 00876.00006.001 11/15/24 -RK

Source: BGW Architects 2024

HELIX Environmental Planning

Bethel Baptist Church Site Plan

Figure 3-2

Type B buildings would be approximately 200 feet long by 40 feet wide and would contain a single row of nine, three-bedroom units with a total of 20,560 SF. Type B buildings would be three stories at a height of approximately 38 feet. The first floor would include two-car garages and in some units, one bedroom. The second floor would contain the kitchen and living areas, and the third floor would contain bedrooms. A total of two Type B buildings would be constructed along the western portion of the project site. Figure 3-4, *Residential Building Elevations – Type B,* shows a colored rendering of the Type B building elevations.

Type C buildings would be approximately 180 feet long by 55 feet wide and would consist of three stories at a height of approximately 38 feet. Each Type C building would include 20, one- to two-bedroom units with a total of 27,203 SF. One-car garages and living areas, kitchens, and bedrooms for some units would be on the first floor. The second and third floors would contain kitchens, living areas, and bedrooms. A total of four Type C buildings would be constructed, including two along the eastern portion of the project site and two in the western portion of the site. Figure 3-5, *Residential Building Elevations – Type C*, shows a colored rendering of Type C building elevations.

Type D buildings would be U-shaped and approximately 165 feet by 155 feet with 74, one-to two-bedroom units with a total of 87,235 SF. Type D buildings would be four stories at a height of approximately 49 feet. Garages and portions of some units would be on the first floor, with the second through fourth floors comprising kitchens, living areas, and bedrooms. The garages are on the interior sides of the U-shaped buildings and separated by a 24-foot-wide drive aisle. A total of two Type D buildings would be constructed in the central portion of the site. Figures 3-6a and 3-6b, *Residential Building Elevations – Type D*, show colored renderings of Type D building elevations.

Residential buildings would be designed with a uniform architectural style, including white plaster exterior walls, terra cotta tile roofs, earth-toned stone veneer accents and siding, gray siding, dark vinyl windows, brown fascia and window trim, brown trellises and guardrails, wood corbels, and decorative clay vents. Refer to Figures 3-3 through 3-6 for architecture and design treatments.

Table 3-1
RESIDENTIAL DEVELOPMENT SUMMARY

Building Type	Number of Buildings	Stories	Unit Mix Units/Building	Units/ Building	Total Units/ Building Type	Total SF/ Building	Total SF/ Building Type
A	2	3	2 and 3 bedrooms	6	12	12,989	25,978
B	2	3	3 bedrooms	9	18	20,560	41,120
C	4	3	1 to 2 bedrooms	20	80	27,203	108,812
D	2	4	1 to 2 bedrooms	74	148	87,235	174,470
TOTAL	**10**	--	--	--	**258**	--	**350,380**

3.3.1.1 Resident Amenities

Proposed resident amenities would include a clubhouse/leasing center building, garages, a pet spa, a swimming pool, grassy lawns, and outdoor gathering areas.

The clubhouse/leasing building would encompass 11,544 SF and would include a fitness center, business center, club room, restrooms, pool equipment room, and leasing offices and associated spaces. The building would be two stories at a height of approximately 36 feet and located in the central portion of the residential site. The architecture and design treatments of this building would match the residential buildings. Figure 3-7, *Building Elevations – Clubhouse/Leasing Center*, shows a colored rendering of building elevations.

A resident swimming pool, jacuzzi, and deck area would be constructed adjacent to the clubhouse/leasing center. Seating, tables/benches, covered trellises, heaters, and fire pit would be provided in the pool area.

A small building encompassing 662 SF would be constructed in the eastern portion of the residential site that would contain a pet spa (for residents only) and a maintenance garage. The building would be a single story approximately 16 feet in height and would incorporate the same architecture and design treatments as the other proposed buildings. Figure 3-8, *Building Elevations – Pet Spa*, shows building elevations of the proposed pet spa. A small, gated dog park would be provided just south of the lawn.

3.3.1.2 Access, Circulation, and Parking

Access to the residential development would be provided via two entries. The primary entry would be from Felicita Road with a 36-foot-wide drive aisle near the middle of the project frontage. A secondary entry would be provided along Brotherton Road with a 24-foot-wide drive aisle approximately in the middle of the frontage along the roadway.

Internal circulation for the residential development would be provided via a system of connected 24-foot-wide drive aisles between the project entries, residential garages, and parking areas. Additionally, accessible walkways would be provided throughout the site to connect the common areas to the residential buildings, amenity buildings, and parking areas. The internal drive aisles and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles.

Parking for the residential development would be provided within resident garages and surface lots between the residential buildings. In addition to the garages associated with the residential building types described above, 15 detached resident garages would be provided in the northeastern corner of the residential development and would encompass 3,273 SF. A total of 441 parking spaces would be provided, including 169 garage spaces associated with the residential units, 220 open parking spaces, and 52 carport spaces. Of the 389 total garage and open parking spaces 45 spaces would include electric vehicle (EV) charger spaces and an additional 177 would be EV ready. The proposed number of parking spaces would exceed the required number of 331 spaces.

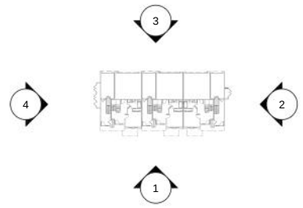
3.3.1.3 Landscaping

Landscaping for the residential development would be provided along the project frontages of Felicita Road and Brotherton Road, project entries, proposed buildings, club house/leasing center, parking areas, and other common areas. A variety of trees and shrubs would be planted along the Felicita Road and Brotherton Road project frontages and entries. Proposed tree species include Australian willow, Natchez crape myrtle, and forest pansy redbud. Additional trees (magnolia, Brisbane box, olive, Mexican sycamore, coast live oak, and date palm) and shrubs would be planted internally. The proposed biofiltration basins would be planted with grasses, including dune sedge, sender sedge, spreading rush, and basket rush; and accented with Mexican sage brush. Synthetic turf would be provided at the dog run.



REAR ELEVATION 3

KEY PLAN





LEFT ELEVATION 4



RIGHT ELEVATION 2



FRONT ELEVATION 1

0 4' 8' 16'

I:\PROJECTS\1\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-3_BuildingElevations_A.indd 00876.00006.001 01/25/24 -RK

Source: Architecture Design Collaborative 2023

HELIX Environmental Planning

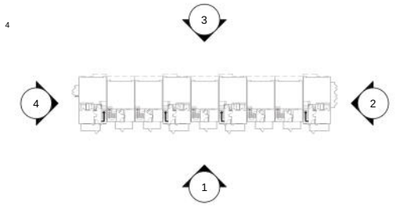
Building Elevations - Type A

Figure 3-3



REAR ELEVATION 3

KEY PLAN





LEFT ELEVATION 4



RIGHT ELEVATION 2



FRONT ELEVATION 1

I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-4_BuildingElevations_B.indd 00876.00006.001 01/25/24 -RK

Source: Architecture Design Collaborative 2023

HELIX Environmental Planning

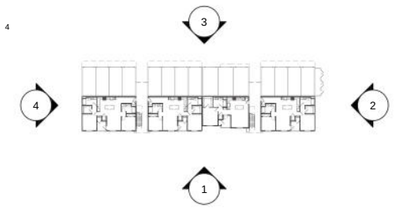
Building Elevations - Type B

Figure 3-4



REAR ELEVATION 3

KEY PLAN





LEFT ELEVATION 4



RIGHT ELEVATION 2

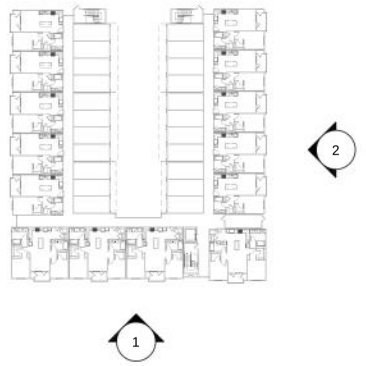


FRONT ELEVATION 1

I:\PROJECTS\TI\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-5_BuildingElevations_C.indd 00876.00006.001 01/25/24 -RK

Source: Architecture Design Collaborative 2023

KEY PLAN





RIGHT ELEVATION 2



FRONT ELEVATION 1

I:\PROJECTS\1\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-6a_BuildingElevations_D.indd 00876.00006.001 01/25/24 -RK

Source: Architecture Design Collaborative 2023

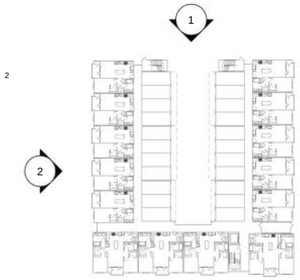
HELIX Environmental Planning

Building Elevations - Type D

Figure 3-6a



KEY PLAN



LEFT ELEVATION 2



REAR ELEVATION 1

I:\PROJECTS\T\TrammellCrowCo_008761\00006_Alexan_Residential\Map\EIR\Fig3-6b_BuildingElevations_D.indd 00876.00006.001 01/25/24 -RK

Source: Architecture Design Collaborative 2023

HELIX Environmental Planning

Building Elevations - Type D

Figure 3-6b

KEY PLAN





LEFT ELEVATION 4



RIGHT ELEVATION 2



REAR ELEVATION 3



FRONT ELEVATION 1

0 4' 8' 16'
SCALE: 1/8" = 1'-0"

Source: Architecture Design Collaborative 2023

I:\PROJECTS\T\TrammellCrowCo_008760\00006_Alexan_Residential\Map\ER\Fig3-7_BuildingElevations_Clubhouse.indd 00876.00006.001 01/25/24 -RK

Building Elevations - Clubhouse/Leasing Center

Figure 3-7

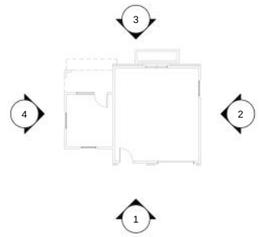


LEFT ELEVATION 4



RIGHT ELEVATION 2

KEY PLAN





REAR ELEVATION 3



FRONT ELEVATION 1

0 2' 4' 8'

Source: Architecture Design Collaborative 2023

I:\PROJECTS\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-8_BuildingElevations_PetSpa.indd 00876.00006.001 01/25/24 -RK

HELIX Environmental Planning

Building Elevations - Pet Spa

Figure 3-8

Proposed hardscape improvements for the residential development would include enhanced paving; seating and tables, outdoor kitchen counters, fire pits, and overhead trellises at the club house; bicycle racks; and decorative lighting. Figure 3-9, *Proposed Landscape Plan – Alexan Escondido*, shows the proposed landscaping within the residential development.

3.3.1.4 Utilities

Site runoff from the proposed residential development would be directed to three proposed stormwater biofiltration basins within the residential site: one at the northwest corner, one at the southwest corner, and one in the eastern portion of the site, east of the club house and pool deck. Each biofiltration basin would be approximately 645 SF. Runoff from the biofiltration basins would be discharged through the site via a new 54-inch reinforced concrete pipe (RCP) within a proposed 20-foot-wide easement where it would continue off site to the south in dual 30-inch RCP storm drains and connect to an existing 54-inch RCP storm drain in Palm Terrace.

Water and sewer service in the project area is provided by the City. The project would include construction of a series of water and sewer pipelines within the residential site and primarily within the drive aisles. The proposed points of connection would be an existing eight-inch water main in Felicita Road, an existing eight-inch sewer main in Felicita Road, and an existing eight-inch sewer main in Brotherton Road. Additionally, two existing fire hydrants along Felicita Road would be relocated.

Electricity and natural gas service is currently provided to the project site by San Diego Gas & Electric (SDG&E). The project would connect to existing SDG&E infrastructure along Felicita Road and Brotherton Road. The project would remove three existing SDG&E power poles and underground existing overhead power lines along the project frontage on Felicita Road. The project applicant would coordinate with SDG&E for the undergrounding of these overhead lines. The existing power poles and overhead electric lines along Brotherton Road would remain in place. If the project utilizes natural gas, it would connect to the existing gas lines within Felicita Road and/or Brotherton Road. Telecommunications would also connect to existing infrastructure along Felicita Road.

3.3.1.5 Walls, Fencing, and Lighting

Walls and fencing are proposed around the site perimeter and in the common areas of the residential development. Retaining walls would be constructed along the eastern and southern residential site boundaries. The retaining walls would be constructed approximately two feet from the property lines and would vary in height between 5 and 13 feet.

The proposed retaining wall along the eastern site boundary would include a planting pocket with vines to grow on the face of the wall. A 42-inch-high steel guardrail would be constructed on top of the proposed retaining walls along the eastern and southern residential site perimeters.

Proposed fencing within the residential development would include a four-foot-high mesh fence around the dog park and a five-foot-high tempered glass fence around the swimming pool area.

Exterior lighting would be provided for safety, security, and circulation purposes. Different exterior lighting fixtures would be used, including pole-mounted streetlights and wall-mounted residential lights. Consistent with Article 35 of the City's Zoning Ordinance, exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded to prevent spillover onto adjacent property and into the night sky.

3.3.2 Bethel Baptist Church Development

The proposed church development includes the demolition of the existing 24,395 SF church and development of a new church building, an outdoor courtyard, playgrounds, and associated parking and access drives. The proposed church building would encompass 24,627 SF with an approximately 600-seat sanctuary, an entryway/foyer, offices, meeting rooms, a kitchen, and storage. The new building would be an addition to, and would connect with, the two existing school buildings that serve as children/youth classrooms and meeting spaces for the church. The church building would be one story with a mezzanine at a height of approximately 30 feet with a 42-foot-high steeple feature on the northern side. Exterior building materials would include earth-toned stucco, gray metal panel, wood-colored ceramic tile walls, stone steeple and entry columns, and dark bronze aluminum window frames. Figure 3-10, *Church Building Elevations*, shows the building elevations of the proposed church building.

The church development would also construct two dwelling units in the eastern portion of the church site. These units would be used as temporary housing for traveling missionaries supported by the church. One unit would include a primary residence with an area of approximately 1,050 SF, and the other would be an approximately 500-SF accessory dwelling unit. The units would be arranged in a linear configuration east of the new church building along the eastern property boundary.

An outdoor courtyard would be constructed to the west of the new church building and between the existing school buildings. The courtyard would include a playground, a water fountain, gathering areas with seating, and landscaping.

A grass sports field and a basketball court would be constructed in the southeastern portion of the church site, south of the church building and parking lots.

3.3.2.1 Access, Circulation, and Parking

Access to the church development would be provided from two entries along Brotherton Road generally where the existing access drives are located. The western driveway would be approximately 28 feet wide, and the eastern driveway would be approximately 35 feet wide.

The driveways would connect to a paved internal loop road that would be a minimum of 24 feet wide, as well as parking areas on the northern, eastern, and southern sides of the church development. A total of 207 parking spaces would be provided, which would include 12 accessible spaces, 10 EV ready spaces, and 44 EV capable spaces.

The internal loop circulation and project design complies with minimum width and vertical clearance to accommodate fire trucks and emergency response vehicles.

3.3.2.2 Landscaping

Landscaping for the church development would be provided along the project frontage of Brotherton Road and portions of the eastern, southern, and western church site perimeters; around existing and proposed buildings; and within the proposed courtyard and parking areas.

Trees along Brotherton Road and the church site perimeter would include Mexican sycamores and coast live oaks. A variety of trees would be planted around the buildings and in the parking areas, including Brisbane box, magnolia, Natchez crepe myrtle, Wilson olive desert, white pine, and Australian willow.



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-9_LandscapePlan_Alexan.indd 00876.00006.001 12/05/24 -RK

Source: adc 2024

HELIX Environmental Planning

Proposed Landscape Plan – Alexan Escondido

Figure 3-9



1 NORTH ELEVATION
SCALE: 1/8" = 1'



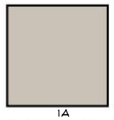
3 WEST ELEVATION
SCALE: 1/8" = 1'



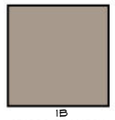
2 EAST ELEVATION
SCALE: 1/8" = 1'



4 SOUTH ELEVATION
SCALE: 1/8" = 1'



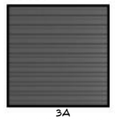
1A
STUCCO: TO MATCH SHERWIN WILLIAMS "SKYLINE STEEL" SW1015



1B
STUCCO: TO MATCH SHERWIN WILLIAMS "STICKS & STONES" SW7503



2A
WOOD-LOOK CERAMIC TILE: DALTILE, EMERSON WOOD COLOR "BUTTER PECAN"



3A
METAL PANEL: MBCI 12 PANEL COLOR "SLATE GRAY"

4A
STONE: CULTURED STONE, SCULPTED ASHLAR COLOR "GROUSE"

5A
WINDOW FRAMES: DARK BRONZE ANODIZED ALUMINUM

I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-10_ChurchElevations.indd 00876.00006.001 12/05/24 -RK

Source: BGW Architects 2024

Church Building Elevations

Figure 3-10

These trees also would be planted in the courtyard along with date palms. Various shrubs, vines, and groundcover would be planted along the church site perimeters and internally. Proposed biofiltration basins would be planted with grasses, including dune sedge, sender sedge, spreading rush, and basket rush; and accented with Mexican sage brush. Decorative cobble would also be placed at the bottom of the biofiltration basins. Synthetic turf would be provided at the sports field.

Proposed hardscape improvements for the church site would include enhanced paving; seating and tables, and decorative lighting. Figure 3-11, *Proposed Landscape Plan – Bethel Baptist Church*, shows the proposed landscaping within the church development.

3.3.2.3 Utilities

Site runoff from the proposed church development would be directed to three proposed stormwater biofiltration basins within the church site: one at the northeast corner (approximately 3,000 SF), one near the northwest corner (approximately 3,000 SF), and one in the southeast corner (approximately 9,000 SF). Runoff from the northeastern and northwestern biofiltration basins would be discharged to two curb outlets onto Brotherton Road. Runoff from the southeastern basin would be discharged to three outlets with riprap energy dissipators in the southeastern corner. In addition, a trench drain would be constructed along the eastern and southern church site perimeters that would also collect runoff and convey it to the three outlets.

Water service in the project area is provided by the Rincon Water District and sewer service is provided by the City. The project would include construction of water and sewer pipelines within the internal access drive. The proposed points of connection would be an existing six-inch water main along Brotherton Road and an existing eight-inch sewer main in Brotherton Road.

The project would connect to existing SDG&E infrastructure along Brotherton Road. If the project utilizes natural gas, it would connect to the existing gas lines within Brotherton Road. Telecommunications would also connect to existing infrastructure along Brotherton Road.

3.3.2.4 Walls, Fencing, and Lighting

A retaining wall would be constructed along the eastern and southern church site boundaries. One continuous wall would extend along the southern site boundary, cut across the southeastern corner, and continue along the eastern site boundary. The retaining wall would be constructed approximately five feet from the property lines and would vary in height, with a maximum height of approximately five feet. A six-foot-high decorative concrete plank wall would be constructed on the eastern side of the proposed courtyard. Proposed fencing within the church development would include a four-foot-high mesh fence around the sports field and a six-foot-high steel rail fence around the playground in the courtyard.

Exterior lighting would be provided for safety, security, and circulation purposes. Different exterior lighting fixtures would be used, including pole-mounted streetlights and wall-mounted building lights. Consistent with Article 35 of the City's Zoning Ordinance, exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded to prevent spillover onto adjacent property and into the night sky.

3.4 Roadway Improvements

Roadway improvements to Felicita Road are proposed along the project frontage and to Palm Terrace to the south. Felicita Road currently has an 84-foot-wide right-of-way (ROW) with 47 feet of pavement, a 5.5-foot-wide sidewalk on the west side, and curb and gutter on both sides. Along the project frontage, the pavement would be widened an additional 17 feet on the east side for a total paved width of 64 feet and a 5.5-foot-wide sidewalk and curb and gutter would be constructed on the east side of the widened pavement that would extend to Palm Terrace. Curb ramps would be installed at the corners of the Brotherton Road and Palm Terrace intersections. A new driveway to the residential property to the immediate south would also be provided.

Along Brotherton Road, improvements would include a new curb cut/driveway at the residential development entrance, and two reconfigured curb cuts/driveways at the church development entrances. Figures 3-12a and 3-12b, *Project and Roadway Cross-sections*, shows the proposed roadway improvements.

The project also includes off-site roadway improvements to five intersections and one roadway segment in the project area, as identified in Section 3.6 below. Additionally, the project proposes off-site improvements at various roadways to reduce significant impacts related to vehicle miles traveled (VMT). As detailed in Section 4.11, *Transportation*, of this EIR and mitigation measure TRA-1, these improvements include installing high-visibility crosswalks at multiple intersections and new sidewalk along portions of Felicita Road in accordance with the City's VMT Exchange Program. While these improvements will require an off-site improvement plan, they are limited in scope, occur within the City's existing right-of-way, and may involve considerations such as traffic control and striping.

3.5 Public Services

Solid waste service to the project site is currently provided by Escondido Disposal. Under the proposed project, the site would continue to be served by Escondido Disposal.

The proposed project would be served by the Escondido Fire Department. The closest fire station to the project site is Escondido Station No. 5 located at 2319 Felicita Road, approximately 0.25 mile south of the project site.

Police protection services for the project site would be provided by the Escondido Police Department. The police station is at the Police and Fire Headquarters at 1163 North Centre City Parkway, approximately 2.75 miles northwest of the project site.

The project site is within the service boundaries of Escondido Union School District (Transitional Kindergarten-8th grade) and Escondido Union High School District (grades 9-12). The project site is within the attendance boundaries of the following schools:

- Miller Elementary School: located at 1975 Miller Avenue, approximately 50 feet to the north across Brotherton Road.
- Del Dios Academy of Arts and Sciences: located at 1400 West Ninth Avenue, approximately 1.5 miles to the northwest.



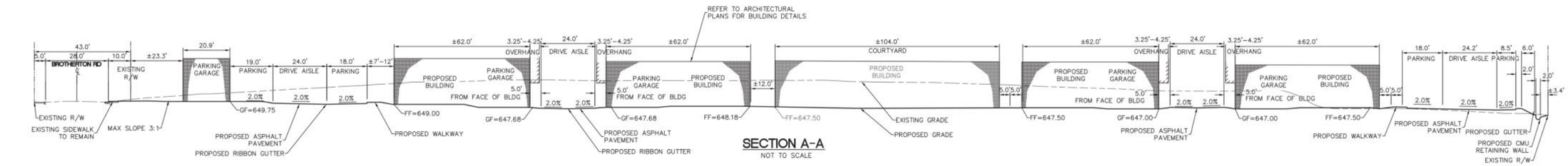
I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-11_LandscapePlan_Church.indd 00876.00006.001 12/05/24 -RK

Source: BGW Architects 2024

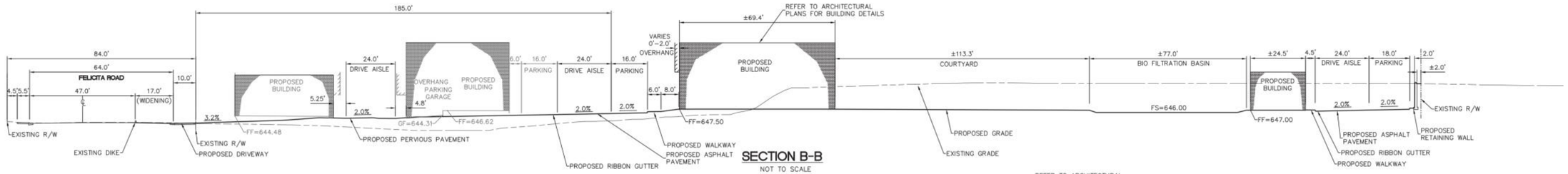
HELIX Environmental Planning

Proposed Landscape Plan – Bethel Baptist Church

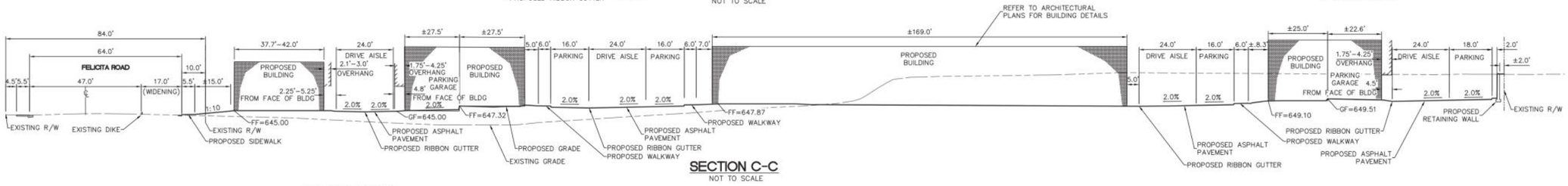
Figure 3-11



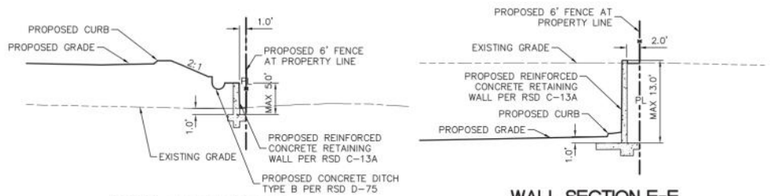
SECTION A-A
NOT TO SCALE



SECTION B-B
NOT TO SCALE

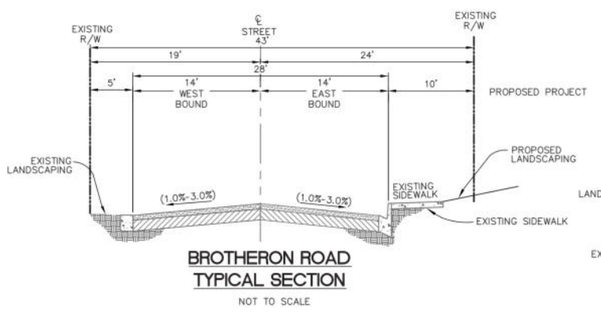


SECTION C-C
NOT TO SCALE

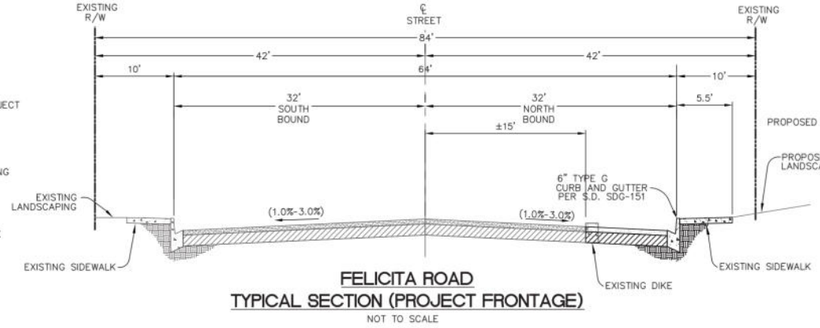


WALL SECTION D-D
NOT TO SCALE

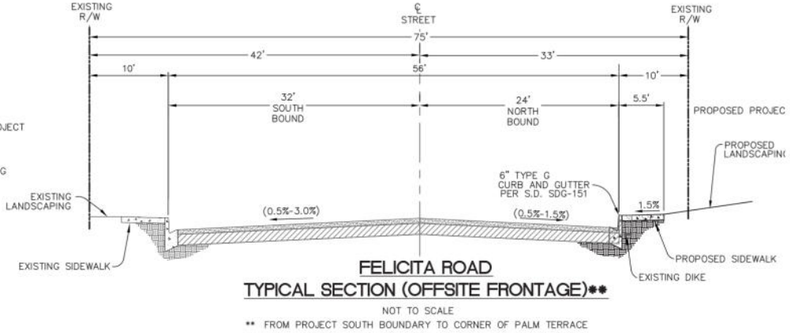
WALL SECTION E-E
NOT TO SCALE



BROTHERON ROAD TYPICAL SECTION
NOT TO SCALE



FELICITA ROAD TYPICAL SECTION (PROJECT FRONTAGE)
NOT TO SCALE



FELICITA ROAD TYPICAL SECTION (OFFSITE FRONTAGE)**
NOT TO SCALE

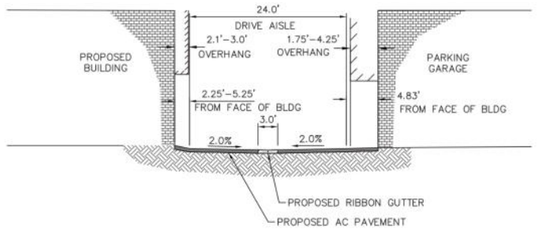
** FROM PROJECT SOUTH BOUNDARY TO CORNER OF PALM TERRACE

Source: Nasland 2024

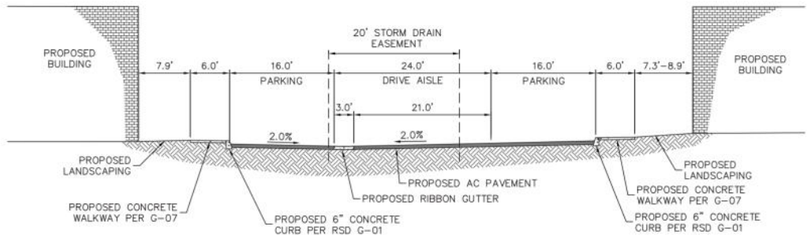
I:\PROJECTS\T\TrammellCrowCo_00876100006_Alexan_Residential\Map\EIR\Fig3-12a_Project_Roadway_Cross-sections.indd 00876.00006.001 12/05/24-RK

Project and Roadway Cross-sections

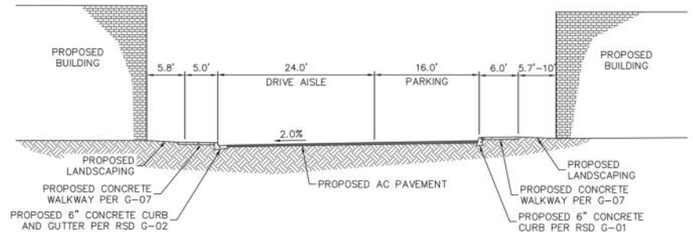
Figure 3-12a



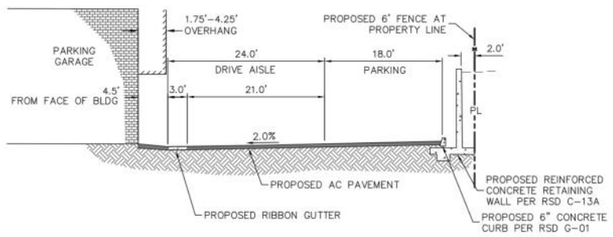
SECTION 1-1
NOT TO SCALE



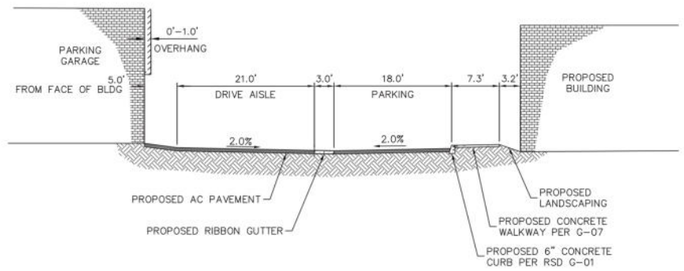
SECTION 2-2
NOT TO SCALE



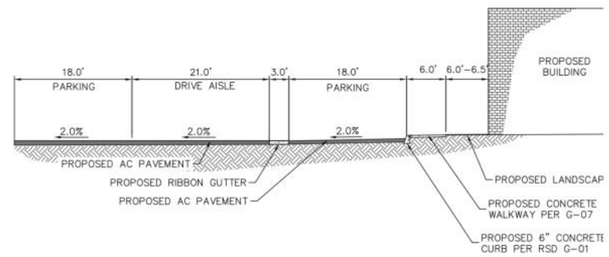
SECTION 3-3
NOT TO SCALE



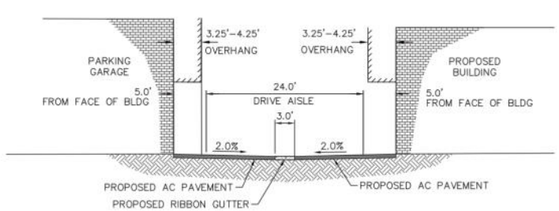
SECTION 4-4
NOT TO SCALE



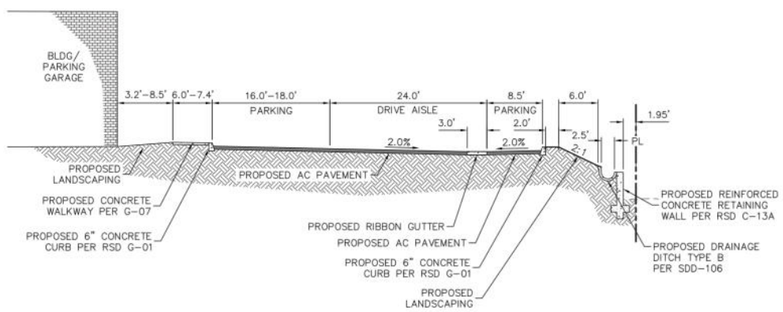
SECTION 5-5
NOT TO SCALE



SECTION 6-6
NOT TO SCALE



SECTION 7-7
NOT TO SCALE



SECTION 8-8
NOT TO SCALE

Source: Nasland 2024

I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-12b_Project_Roadway_Cross-sections.indd 00876.00006.001 12/05/24-RK

- San Pasqual High School: located at 3300 Bear Valley Parkway, approximately 2.0 miles to the southeast.

3.6 Project Design Features and Compliance Measures

The following project design features and compliance measures are proposed and would be conditions of approval:

- **Indoor Air Filtration**. The residential building designs will include a mechanical ventilation system that meets the criteria of the International Building Code (Section 1203.2 of the California Building Code) to ensure that windows would be able to remain closed while maintaining adequate ventilation and temperature control. The mechanical ventilation system will be designed to accommodate, and equipped with, filters having a Minimum Efficiency Reporting Value (MERV) rating of 13 or higher.

- **Demonstration of Residential Interior Noise Standard Compliance.** Interior noise levels for the project's proposed residential units will be demonstrated not to exceed 45 CNEL. Once final building plan information is available, additional exterior-to-interior noise analysis will be conducted for habitable rooms in residential units with a direct line of sight to Felicita Road or I15.

  The information in the analysis will include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific building plan information, the analysis will determine the predicted interior noise levels at the planned on-site residential units. If predicted noise levels are found to be in excess of 45 CNEL, the report will identify architectural materials or techniques that could be included to reduce noise levels to 45 CNEL in habitable rooms.

  Air conditioning or mechanical ventilation systems will be installed to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system will meet the criteria of the International Building Code (Chapter 12, Section 1203 of the California Building Code in effect at the time of permit issuance).

- **Demonstration of Church Development Interior Noise Standard Compliance**. Interior noise levels for the project's proposed church building and missionary residential units will be demonstrated not to exceed 45 CNEL. Once final building plan information is available, additional exterior-to-interior noise analysis will be conducted for rooms along the southern and eastern edges of the church building as well as for each missionary residential unit.

  The information in the analysis will include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific building plan information, the analysis will determine the predicted interior noise levels within useable rooms. If predicted noise levels are found to be in excess of 45 CNEL, the report will identify architectural materials or techniques that could be included to reduce interior noise levels to 45 CNEL.

Air conditioning or mechanical ventilation systems will be installed to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system will meet the criteria of the International Building Code (Chapter 12, Section 1203 of the California Building Code in effect at the time of permit issuance).

- **Citracado Parkway/Felicita Road**: Re-stripe the eastbound approach to include a second dedicated eastbound left-turn lane and re-stripe the north leg to include a second receiving lane. Also install a "KEEP CLEAR" striping to ensure that eastbound left-turning vehicles do not obstruct the I-15 southbound off-ramp.

- **Citracado Parkway/I-15 Northbound Ramps**: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.

- **Gamble Lane/I-15 Southbound Off-ramp**: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.

- **Brotherton Road/Miller Avenue**: Install an all-way stop control.

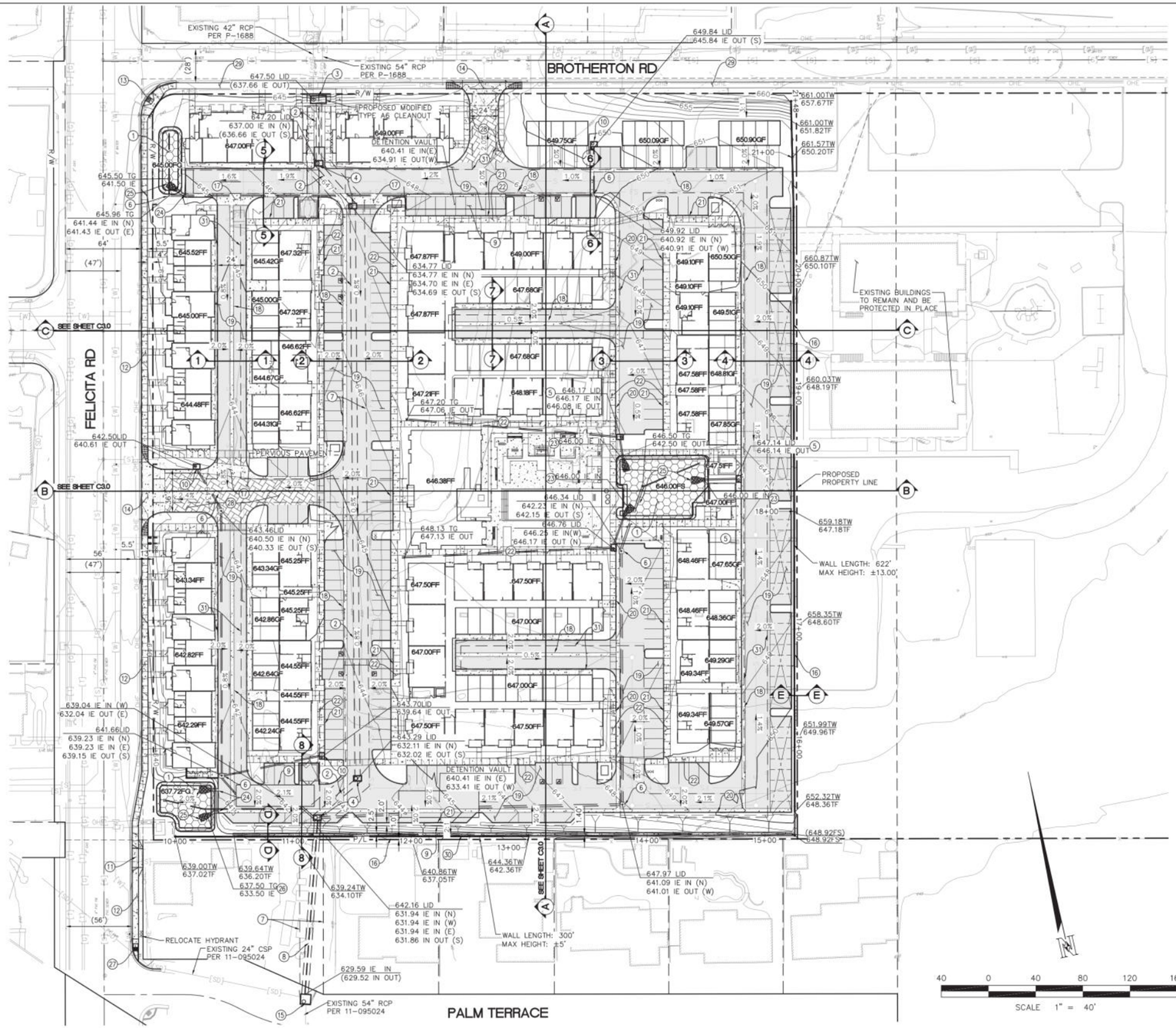
- **Citracado Parkway/Miller Avenue**: Contribute a fair-share towards re-striping the eastbound approach to include a dedicated eastbound left-turn lane and a dedicated eastbound through lane.

- **Felicita Road between Project Driveway #2 and Citracado Parkway**: The improvements recommended above at the Citracado Parkway/Felicita Road intersection would improve operations at this street segment. In addition, the proposed widening of Felicita Road along the project frontage between Brotherton Road and the southern project site boundary would also help reduce the substantial effect on this street segment.

3.7 Demolition, Grading, and Construction

The total construction period for the project is estimated at approximately 25 months. Construction activities would include site preparation (clearing/grubbing), demolition, grading, installation of underground utilities, building construction, paving, and architectural coating (e.g., painting). Construction of the residential and church developments would begin concurrently but would have variations in the duration of each activity.

It is anticipated that grading would involve 71,260 cubic yards (CY) of cut and 24,760 CY of fill on the residential development site and 5,050 CY of cut and 44,400 CY of fill on the church development site, resulting in a net export of 7,150 CY of soil. Approximately 30 truckloads of debris from the residential development site and 15 truckloads of debris from the church site are anticipated to be hauled during demolition. During site preparation, approximately 10 truckloads (160 CY) of vegetation are anticipated to be hauled from the residential site and approximately five truckloads (80 CY) of vegetation are anticipated to be hauled from the church site. The maximum cut and fill slopes would be approximately 12 feet in height. Figure 3-13, *Grading Plan – Alexan Escondido*, shows the preliminary grading plan for the residential development and Figure 3-14, *Grading Plan – Bethel Baptist Church*, shows the preliminary grading plan for the church development. Construction activities would be required to comply with San

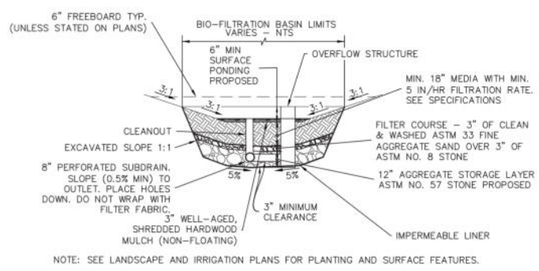


LEGEND

- PROPOSED BIOFILTRATION BMP.....
- PROPOSED STORM DRAIN.....
- PROPOSED MODULAR WETLAND.....
- PROPOSED STORM DRAIN CLEANOUT.....
- PROPOSED JUNCTION STRUCTURE.....
- PROPOSED PRIVATE 8" SEWER LATERAL..... S
- PROPOSED DOMESTIC WATER..... W
- PROPOSED FIRE SERVICE..... FS
- PROPOSED FIRE DEPARTMENT CONNECTION....
- PROPOSED TRUST BLOCK.....
- PROPOSED GATE VALVE.....
- PROPOSED FIRE HYDRANT.....
- RETAINING WALL.....
- PROPOSED PERVIOUS PAVEMENT.....
- DRAINAGE DIRECTION..... X.X%

CONSTRUCTION NOTES

1. PROPOSED BIOFILTRATION BMP.
2. PROPOSED 54" RCP STORM DRAIN.
3. PROPOSED TYPE A6 MODIFIED STORM DRAIN CLEANOUT.
4. PROPOSED TYPE A6 STORM DRAIN CLEANOUT.
5. PROPOSED CURB INLET.
6. PROPOSED STORM DRAIN CLEANOUT.
7. PROPOSED 20' EASEMENT.
8. PROPOSED DUAL 30" RCP STORM DRAIN.
9. PROPOSED UNDERGROUND DETENTION VAULT.
10. PROPOSED MODULAR WETLAND SYSTEM UNIT.
11. PROPOSED CONCRETE DRIVEWAY TYPE A PER G-14A.
12. PROPOSED SIDEWALK PER RSD G-7.
13. PROPOSED TYPE A CURB RAMP PER RSD G-27.
14. PROPOSED CONCRETE DRIVEWAY PER CITY OF ESCONDIDO ALLEY TYPE G-5-E.
15. REMOVE EXISTING HEADWALL. INSTALL MODIFIED CLEANOUT.
16. PROPOSED CMU RETAINING WALL. SEE WALL CROSS SECTIONS FOR VARIATIONS.
17. PROPOSED 10' CROSS GUTTER PER RSD G-12.
18. PROPOSED 3' CONCRETE SWALE.
19. PROPOSED AC PAVEMENT.
20. PROPOSED CURB AND GUTTER PER RSD G-02.
21. PROPOSED 6" CONCRETE CURB PER RSD G-01.
22. PROPOSED CONCRETE WALKWAY.
23. PROPOSED CONCRETE HEADWALL PER RSD D-30
24. PROPOSED CURB CUT AND CONCRETE FLUME.
25. PROPOSED RIP RAP ENERGY DISSIPATOR.
26. PROPOSED 24"x24" INLET.
27. PROPOSED TYPE D CURB RAMP PER RSD G-31.
28. PROPOSED PERVIOUS PAVEMENT.
29. EXISTING SIDEWALK TO REMAIN AND BE PROTECTED IN PLACE.
30. PROPOSED CONCRETE DITCH TYPE B PER RSD D-75.
31. PROPOSED 20' SEWER EASEMENT.



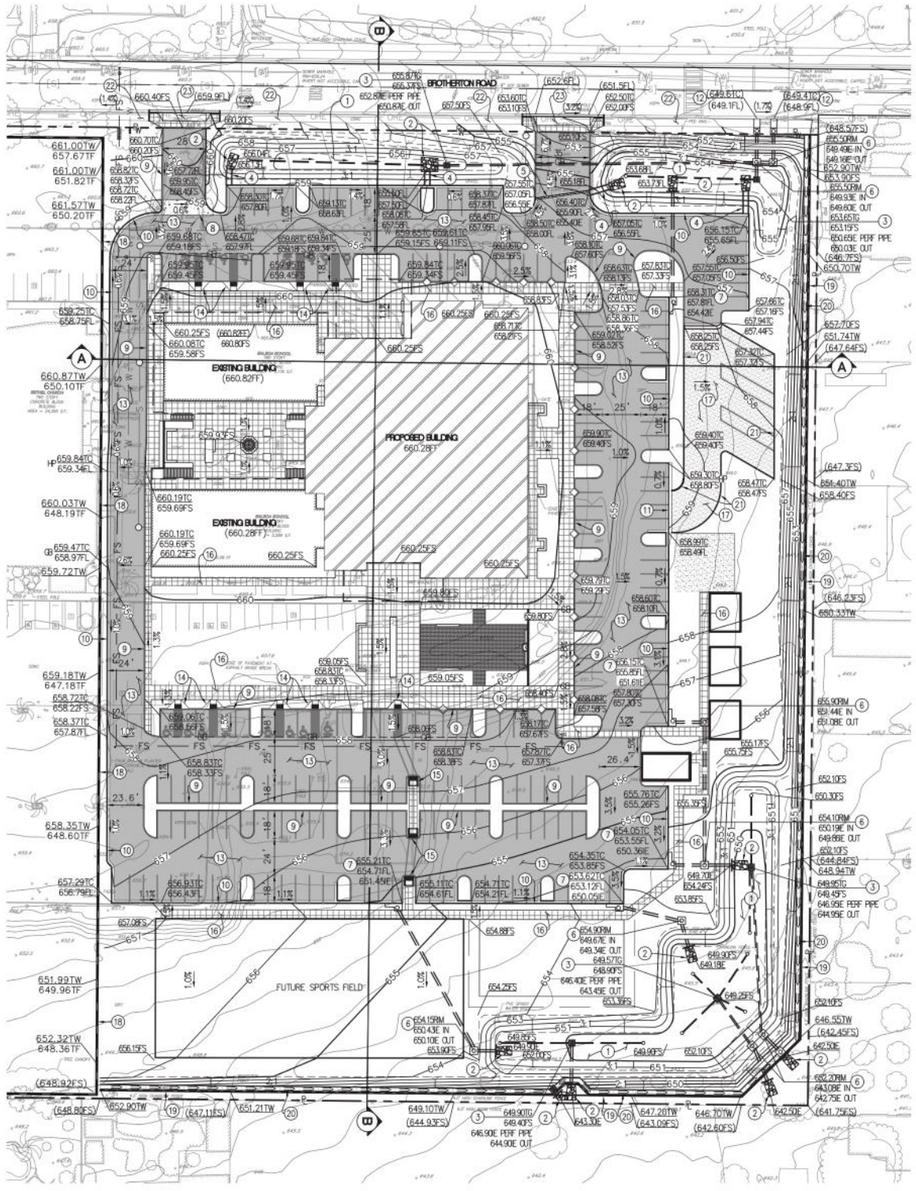
NOTE: SEE LANDSCAPE AND IRRIGATION PLANS FOR PLANTING AND SURFACE FEATURES.

BIOFILTRATION BASIN DETAIL (AT GRADE) (PVT.)

NOT TO SCALE

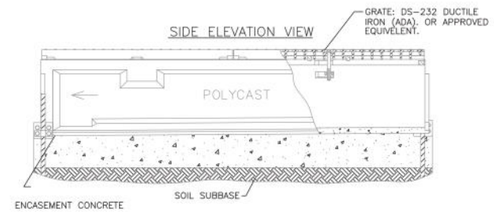
I:\PROJECTS\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-13_GradingPlan_Alexan.indd 00876.00006.001 12/05/24 -RK

Source: Nasland 2024



CONSTRUCTION NOTES

1. PROPOSED BIOFILTRATION BMP.PER DETAIL THIS SHEET.
2. PROPOSED RIP RAP ENERGY DISSIPATOR RSD SDD-104.
3. PROPOSED TYPE I CATCH BASIN RSD D-29.
4. PROPOSED CONCRETE FLUME PER DETAIL THIS SHEET.
5. PROPOSED TRENCH DRAIN PER DETAIL THIS SHEET.
6. PROPOSED TYPE A STORM DRAIN CLEANOUT RSD D-09.
7. PROPOSED TYPE B CURB INLET RSD SDD-116.
8. PROPOSED CROSS GUTTER RSD SDG-157.
9. PROPOSED 6" CONCRETE CURB RSD SDG-150.
10. PROPOSED 6" CONCRETE CURB AND GUTTER RSD SDG-151.
11. PROPOSED CONCRETE ROLLED CURB RSD G-4A.
12. PROPOSED CURB TYPE A OUTLET RSD D-25A.
13. PROPOSED ASPHALT CONCRETE (AC) PAVEMENT.
14. PROPOSED PED RAMP TYPE A RSD SDG-132.
15. PROPOSED PED RAMP TYPE D (MODIFIED WITH CURB ON BOTH SIDES) RSD SDG-137.
16. PROPOSED CONCRETE SIDEWALK, SEE LANDSCAPE FOR COLOR AND FINISH.
17. PROPOSED GRAVEL PAVING SECTION.
18. PROPOSED RETAINING WALL PER SEPARATE PERMIT, REFER TO PL23-0273.
19. PROPOSED MASONRY RETAINING WALL TYPE 4 RSD C-04.
20. PROPOSED DRAINAGE DITCH TYPE B RSD SDD-106.
21. PROPOSED REDWOOD HEADER.
22. EXISTING SIDEWALK TO REMAIN IN PLACE.
23. PROPOSED CONCRETE DRIVEWAY RSD SDG-159.

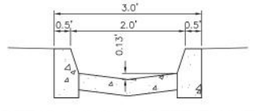


POLYCAST
700 SERIES
LITERATURE NO.
PC1715

HUBBELL
3621 Industrial Park Drive
Lenoir City, TN 37771
Phone: 800-346-5061 or 865-986-9726
Web: http://www.polycastdrain.com
e-mail: hpaliterature@hubbell.com

NOTES:
- CONCRETE STRENGTH, THICKNESS AND REINFORCEMENT BE DETERMINED BY THE STRUCTURAL ENGINEER.
- REFER TO POLYCAST® INSTALLATION GUIDE FOR COMPLETE DETAILS.
- EXPANSION JOINTS SHOULD BE USED TO PROTECT THE CHANNEL AND CONCRETE ENCASEMENT.

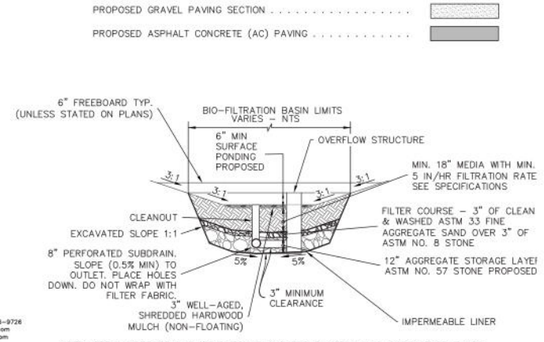
TRENCH DRAIN INSTALLATION DETAIL
NO SCALE



DETAIL 24" CONCRETE FLUME
NO SCALE

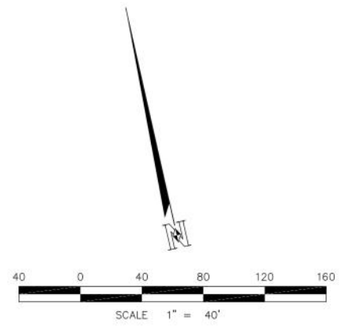
LEGEND

ITEM	SYMBOL
EXISTING:	
EXISTING RIGHT-OF-WAY	
EXISTING CONTOUR	340
EXISTING WATER SERVICE	W
EXISTING WATER MAIN	W
EXISTING FIRE HYDRANT	
EXISTING SEWER MAIN	S
EXISTING STORM DRAIN	
EXISTING GAS	G
EXISTING SPOT ELEVATION	× 341.8
PROPOSED WORK:	
PROPOSED CONTOUR	340
PROPOSED GRADE BREAK	GB
PROPOSED RIP RAP	
PROPOSED STORM DRAIN (PVC/RCP).	
PROPOSED CATCH BASIN (TYPE I).	
PROPOSED STORM DRAIN CLEANOUT (MANHOLE)	
PROPOSED STORM DRAIN CLEANOUT.	
PROPOSED 6" CURB CURB	
PROPOSED 6" CURB CURB AND GUTTER	
PROPOSED SIDEWALK	
SURFACE FLOW	
PROPOSED BIO-RETENSION BASIN.	
PROPOSED PED RAMP TYPE A	
PROPOSED PED RAMP TYPE D	
PROPOSED RETAINING WALL	
PROPOSED GRAVEL PAVING SECTION	
PROPOSED ASPHALT CONCRETE (AC) PAVING	



NOTE: SEE LANDSCAPE AND IRRIGATION PLANS FOR PLANTING AND SURFACE FEATURES.

BIOFILTRATION BASIN DETAIL (AT GRADE) (PVT.)
NO SCALE



I:\PROJECTS\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig3-14_GradingPlan_Church.indd 00876.00006.001 12/05/24 -RK

Source: Nasland 2024

Diego Air Pollution Control District (SDAPCD) requirements to minimize fugitive dust and odors, as discussed in Section 4.2, *Air Quality*.

3.8 Project Approvals

Approval of the proposed project would require a number of discretionary actions. According to CEQA Guidelines Sections 15050 and 15367, the City is designated as the Lead Agency for the project. Responsible agencies include public agencies other than the Lead Agency which have discretionary approval power over the project. The Responsible Agencies for the project include the U.S. Army Corps of Engineers (USACE) and the San Diego Regional Water Quality Control Board (RWQCB). Trustee Agencies are state agencies with jurisdiction by law over natural resources affected by a proposed project that are held in trust of the people of the State of California. CDFW is a Trustee Agency for the proposed project. Table 3-2, *Project Approvals*, identifies the various discretionary actions that would be required to implement the proposed project and the agencies that would grant discretionary approval for these actions.

Table 3-2
PROJECT APPROVALS

Discretionary Approval/Permit	Trigger/Requirement
City of Escondido (Lead Agency)	
General Plan Amendment	Change the General Plan land use designation from Planned Office to Urban V
Zone Map Amendment	Change zoning from RE-20 to R-5-30
Major Plot Plan and Design Review Permit	Construction of 258 multi-family dwelling units, and a Density Bonus Request including certain concessions/incentives, and waivers as permitted by State Density Bonus Law
A Conditional Use Permit (CUP) modification and Design Review Permit	Modification to an existing CUP for the existing religious/school facility and construction of 24,627 square-foot addition to the church
Grading Exemptions	Required for fill slopes/retaining walls up to approximately 12 feet
Adjustment Plat	Lot line adjustment
Certification of Final EIR	Required per CEQA
USACE (Responsible Agency)	
Clean Water Act Section 404 Nationwide Permit	Potential impacts to Waters of the U.S.
San Diego RWQCB (Responsible Agency)	
Clean Water Act Section 401 Water Quality Certification	Potential impacts to Waters of the State
National Pollutant Discharge Elimination System Construction Activities Storm Water General Permit	Required for construction of development sites of one or more acre
CDFW (Trustee Agency)	
Fish and Game Code Section 1600 Streambed Alteration Agreement	Potential impacts to Waters of the State

This page intentionally left blank

4.0 ENVIRONMENTAL ANALYSIS

This chapter of the EIR analyzes the potential environmental impacts that may occur as a result of project implementation. Sections 4.1 through 4.12 provide analysis related to the environmental issues that were identified during the scoping process as having potentially significant impacts and requiring further evaluation. The environmental topics addressed in this chapter include:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Transportation
- Tribal Cultural Resources

Those environmental topics that were determined to have no impact or a less than significant impact with implementation of the proposed project are addressed briefly in Chapter 6, *Effects Found Not to be Significant.*

Each of the following sections provides the environmental setting, regulatory framework, significance thresholds, analysis methodology and assumptions, and project-level impact analysis related to the environmental topic. Significance criteria addressed in this EIR are based on Appendix G of the CEQA Guidelines. Where potentially significant impacts have been identified, mitigation measures are proposed and the level of impacts remaining with incorporation of the mitigation measures is identified.

This page intentionally left blank

4.1 Aesthetics

This section of the EIR describes the existing visual setting of the project site and vicinity within the context of the surrounding community, identifies applicable guidelines and regulations related to aesthetics and visual resources, and evaluates potential aesthetics impacts related to implementation of the project.

4.1.1 Existing Conditions

4.1.1.1 Aesthetics Concepts and Terminology

The following key concepts and terminology are used to describe existing aesthetic and visual quality conditions or to describe the change in existing conditions from implementation of the proposed project.

Views refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic scene from an area. Views may be discussed in terms of *foreground*, *middle ground*, and *background.* Foreground views are those immediately presented to the viewer and include objects at close range that may tend to dominate the view. Middle ground views occupy the center of the viewshed and tend to include objects that are the center of attention if they are sufficiently large or visibly different from adjacent visual features. Background views include distant objects and other objects that make up the horizon. Objects in the background eventually fade to obscurity with increasing distance. In the context of background, the skyline or the ocean can be an important visual feature because objects above this point are highlighted against the background of the sky or water. These "skylined" elements are typically more evident to the viewer because of their inherent contrast.

Scenic vista is an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, state, or local agency.

Scenic highway is any stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency.

Visual character is descriptive and non-evaluative, which means it is based on defined attributes that do not include subjective positive or negative value judgments. Visual character is composed of pattern elements and pattern character. *Pattern elements* are the artistic attributes inherent in the elements that compose a landscape and include the primary visual attributes of objects such as form, line, color, and texture. The form of an object is its visual mass, bulk, or shape. Line is introduced by the edges of objects or parts of objects. The color of an object is both its visual or reflective brightness and its hue. Texture is apparent surface coarseness. Awareness of pattern elements varies with distance. *Pattern character* describes the dominance, scale, diversity, or continuity between the pattern elements. Dominance occurs when a specific feature is prominently positioned, contrasted, or extended to a point where the specific feature strongly influences the pattern character of a scene. Scale is the size relationship among landscape components in the visual environment. Diversity is the frequency, variety, and positioning of pattern elements. Continuity is the uninterrupted flow or transition among pattern elements.

Visual quality is evaluated based on the relative degree of vividness, intactness, and unity within a landscape, as modified by viewer preference and sensitivity. *Vividness* is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns. *Intactness* is the visual integrity of the natural and human-built landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, and in natural settings. *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape.

Viewer response, or awareness, is composed of two elements: viewer sensitivity and viewer exposure. These elements combine to form a method of predicting how the public might react to visual changes brought about by a project's implementation. *Viewer sensitivity* is defined both as the viewers' concern for scenic quality and the viewers' response to change in the visual resources that make up the view. Local values and goals may confer visual significance on landscape components and areas that would otherwise appear unexceptional in a visual resource analysis. *Viewer exposure* is typically assessed by measuring the number of viewers exposed to the resource change, type of viewer activity, duration of the view, the speed at which the viewer moves, and position of the viewer. A viewer's response is also affected by the degree to which they are receptive to the visual details, character, and quality of the surrounding landscape. A viewer's ability to perceive the landscape is affected by their activity. A viewer on vacation would probably take pleasure in looking at the landscape, and an individual may be strongly attached to the view from their home, but a local resident commuting to work may not "register" those same visual resources on a daily basis.

Viewshed is the entirety of the surface area visible from a particular location or sequence of locations (e.g., roadway or trail).

4.1.1.2 Visual Setting and Site Characteristics

The project site is located in a developed area with a mixture of land uses primarily comprised of residential neighborhoods. Churches, schools, fire stations, and health care facilities occur along Felicita Road in the project area. Other commercial uses such as a farm stand with crop fields, veterinary clinics, an office building, and churches occur in the project area along Citracado Parkway. Residential development is mostly single-family homes with some multi-family developments to the east along Brotherton Road and Citracado Parkway. I-15 is located in close proximity to the site at approximately 120 feet to the west, which is elevated compared to the site and crosses over Felicita Road. Other major roadways in the vicinity include Felicita Road, Citracado Parkway, and Centre City Parkway.

Landforms within the project site and vicinity are characterized by relatively flat terrain. The elevation in the project area ranges from approximately 600 to 670 feet AMSL. Vegetated embankments occur along the edges of the nearby I-15 freeway corridor. Within the project site, the developed area occurs on a development pad in the eastern portion of the site that lies approximately 10 to 15 feet higher than the rest of the site.

The central portion of the project site is developed with an existing church building encompassing approximately 24,395 SF and associated surface parking and landscaping. Two school buildings totaling approximately 11,000 SF, a playground, basketball court, and surface parking occupy the eastern portion of the site. The buildings are set back approximately 100 feet from Brotherton Road by landscaping and surface parking. Open views of the church and school facilities can be seen from Brotherton Road and Felicita Road, as well as from the I-15 on the Felicita Road overcrossing.

Views from Brotherton Road generally encompass the roadway, streetside landscaping, wooden utility poles with overhead lines, and fields in the foreground; and fields, asphalt driveways and parking areas, on-site landscaping, the church building, and school buildings in the middle ground. Figures 4.1-1a and 4.1-1b, *Existing Visual Conditions – Brotherton Road Frontage,* shows typical views into the project site from Brotherton Road.

Views from Felicita Road are more open as there is no intervening streetside landscaping and the church building sits atop an elevated building pad. Views from the roadway encompass the roadway, wooden utility poles with overhead lines, a well enclosure (tan masonry walls enclosed with chain-link fencing), and grassy fields in the foreground. In the middle ground, open fields, manufactured slopes along the development pad, on-site landscaping, and the church building can be seen. The church building and manufactured slopes obscure the school facilities from view along the majority of Felicita Road, though the southern school building is visible from the southwestern corner of the project site. Figure 4.1-2, *Existing Visual Conditions – Felicita Road Frontage,* shows typical views into the project site from Felicita Road.

Generally open views of the project site from northbound and southbound I-15 are briefly available from the Felicita Road overcrossing due to its elevated position and lack of intervening landscaping and topography. Given the distance between I-15 and the project site of approximately 120 feet, views of on-site elements from the freeway appear in the middle ground and background. The grass fields, utility poles/overhead lines, and manufactured slopes are visible in the middle ground. Portions of the church building, most notably the steeple, on-site ornamental trees, and distance ridgelines are seen in the background. Glimpses of the southern school building are available in the middle ground but brief due to intervening vegetation. Figure 4.1-3, *Existing Visual Conditions – I-15,* shows typical views towards the project site from the Felicita Road overcrossing along northbound I-15.

Other existing on-site elements include monument signage at the main entrance along Brotherton Road and various signs along the Felicita Road frontage. Utility infrastructure, including fire hydrants, utility boxes, and a water well enclosure are present along the Felicita Road frontage. A drainage swale traverses the western portion of the site in a north-south alignment from a storm drain culvert beneath Brotherton Road and off site to the south to a culvert beneath Palm Terrace. The swale is a natural-bottom channel that is relatively narrow, shallow, and sparsely vegetated with low-growing perennial species and has intermittent water flow. Existing access is provided by driveways along Brotherton Road. A curb cut also occurs in the southwestern portion of the site along Felicita Road that connects to a dirt road that extends across the western portion of the site.

4.1.1.3 Scenic Visual Resources

The Resource Conservation Element of the City's General Plan defines scenic visual resources within the City to include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas. The project site is not located in an area identified in the General Plan as an important intermediate ridgeline, skyline ridge, or other prominent natural landform (City 2012a, Figure VII-5). The closest identified resource is an intermediate ridgeline that runs along the east side of I-15 more than 500 feet north of Felicita Road. The site is developed with existing church and school buildings and paved parking areas on a development pad. The area outside of the development pad consists mostly of disturbed land characterized by dirt and grassy fields with some utility infrastructure. However, a drainage swale extends in a north-south alignment in the western portion of the site from a headwall/outfall structure at Brotherton Road, across the site, and off site to the south. As

previously noted, this swale is a natural-bottom channel that is relatively narrow, shallow, and sparsely vegetated with low-growing perennial species and has intermittent water flow. As such, it does not contain notable scenic features and is not considered a scenic visual resource. No other scenic visual resources occur on the project site.

4.1.1.4 Scenic Highways and Roads

The California Department of Transportation (Caltrans) designates State Scenic Highways to protect public views with high aesthetic value. There are no officially designated or eligible State Scenic Highways within the City. The closest officially designated State Scenic Highway is SR 78 through the Anza-Borrego Desert State Park, approximately 35 miles east of the City.

Scenic roadways are vehicular rights-of-way with considerable natural landscape and a high aesthetic value. Scenic roadway corridors generally include the land adjacent to and visible from the vehicular right-of-way. The dimension of the corridor is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The General Plan EIR (City 2012b) identifies several scenic roadways in the City, including:

- I-15 through City
- Segments of Del Dios Highway to Via Rancho Parkway
- Via Rancho Parkway to Bear Valley Parkway
- Bear Valley Parkway to Valley Parkway
- Valley Parkway to Lake Wohlford Road
- South Citrus Avenue from Bear Valley Parkway to San Pasqual Valley Road
- San Pasqual Valley Road/SR 78 from Bear Valley Parkway to the eastern General Plan boundary
- San Pasqual Road from Bear Valley Parkway to San Pasqual Valley Road

The project site is located approximately 120 feet from I-15 but not near any of the other roadways. The General Plan Resource Conservation Element identifies scenic views within the I-15 corridor, defined as the area within 1,750 feet of the freeway. Prominent views along I-15 include continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges Reservoir, and visually dominant features such as undisturbed hillsides or steep slopes with rock outcroppings.

4.1.1.5 Light and Glare

Excessive nighttime lighting can interfere with the operation of observatories, affect residents' ability to sleep, affect night sky views, and wildlife. In the City, light and glare are of particular concern because of the proximity of Palomar Mountain Observatory, as well as the nuisance that excessive nighttime lighting and glare can create for the City's residents. San Diego County Municipal Code establishes Light Zones to control light pollution around observatories. The area within a 15-mile radius of the center of the Palomar Observatory is included in the definition of Zone A. The project site is approximately 22 miles southwest of the Palomar Mountain Observatory and outside of Light Zone A.

4.1.1.6 Visual Character

The visual character of the project area encompasses diverse forms predominantly composed of built environment features intermixed with limited natural features. The area is almost entirely developed and





I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.1-1a_ExistingConditions_BrotheronRd.indd 00876.00006.001 02/19/24 -RK

HELIX Environmental Planning

Existing Visual Conditions – Brotherton Road Frontage

Figure 4.1-1a





I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.1-1b_ExistingConditions_BrotheronRd.indd 00876.00006.001 12/05/24 -RK

HELIX Environmental Planning

Existing Visual Conditions – Brotherton Road Frontage

Figure 4.1-1b



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.1-2_ExistingConditions_FelicitaRd.indd 00876.00006.001 02/19/24-RK

Existing Visual Conditions – Felicita Road Frontage

HELIX Environmental Planning

Figure 4.1-2



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.1-3_ExistingConditions_I-15.indd 00876.00006.001 02/19/24 -RK

HELIX Environmental Planning

Existing Visual Conditions – I-15

Figure 4.1-3

primarily comprised of residential neighborhoods. Churches, schools, fire stations, and health care facilities occur along Felicita Road in the project area.

Other commercial uses such as a farm stand with crop fields, veterinary clinics, an office building, as well as churches occur in the project area along Citracado Parkway. Residential development is mostly single-family homes with some multi-family developments to the east along Brotherton Road and Citracado Parkway. Despite the predominantly residential land use, building forms and overall development patterns share some common elements but vary greatly with respect to shape and mass.

Surrounding residences are configured in single-family neighborhoods along linear and curvilinear local streets, many of which are cul-de-sacs. Homes generally line both sides of the roadway with rectangular lots that front the roadway. A few homes are tucked away behind others on pan handle lots. Residential building forms within the project vicinity vary but are dominated by one- to two-story buildings that range in age, size, and style. The structures provide geometric forms with linear elements and a mix of colors on the building facades and roofs. Textures are generally smooth to semi-coarse depending on the exterior surface treatment on homes. In general, residential development patterns exhibit a suburban residential character.

Residential development patterns and building forms begin to change two blocks to the east near Centre City Parkway. Higher-density development, including single-family homes on smaller lots and some larger multi-family buildings occur in this area. The area around Centre City Parkway also includes a greater mix of uses and associated building forms. Buildings are generally larger and the character begins to transition to an urbanized neighborhood compared to the immediate environs of the project site.

While the immediate project area comprises mostly residential uses, other uses are present particularly along Felicita Road and to a lesser degree along Miller Avenue and Brotherton Road that provide diverse visual elements. A nursing home is located to the north along Felicita Road that includes a large, sprawling, single-story building on a 4.7-acre lot. The building is much larger than the homes in the area, but the style, colors, materials, and textures are consistent with the single-family homes. Next to the nursing home to the east, and north of the project site, is Miller Elementary School, a 9.5-acre public school campus developed with a one-story circular building that contrasts with surrounding linear building forms, along with several portable classroom buildings. A little further to the north along West Felicita Road is an approximately 7-acre church property that also houses a private school. The main building on this property consists of a one-story semi-circular structure with a taller steeple; this building form also contrasts with surrounding buildings comprised of smaller, linear structures.

Another larger church property (approximately nine acres) and a 4.3-acre assisted living facility occurs southwest of the project site along Felicita Road. The church building is a larger, newer structure with taller elements (i.e., steeples) but the style, colors, materials, and textures are consistent with some single-family homes in the area. The assisted living facility is a relatively large, two-story building that has linear forms with colors, textures, and materials that reference the single-family residential development in the area. Just east of the assisted living facility are two fire station sites (one is Escondido Fire Station No. 5 and one is CalFire Del Dios Station 77) that are developed with two-story buildings that exhibit linear forms generally analogous to two-story homes but at a larger scale.

Other notable surrounding built environment elements that differ from the predominant single-family homes in the immediate area include a farm to the immediate southeast, office buildings and a church further to the southeast, and the elevated I-15 overcrossing structure at Felicita Road to the southwest.

A farm stand is located at the corner of West Citracado Parkway and Miller Avenue along with crop fields behind it that provide rural elements within the context of the project area. This property contains a one-story store, a greenhouse, several outbuildings, and crop fields that encompass approximately four acres. Across from the farm along the south side of West Citracado Parkway are two office buildings and a church. These buildings are larger and taller than the surrounding residential buildings and include linear and curvilinear forms that generally contrast with the homes in this neighborhood.

Roadways and parking areas provide additional developed features that exhibit similar pattern elements but are more uniform in color and texture. Natural features in the project area consist of the on-site drainage swale, undeveloped grassy fields that vary in size, and ornamental vegetation. These natural features are positioned in between, and are surrounded by, development and provide some contrasting shapes, colors, and textures compared to the built features. The vegetation provides various shades of greens, yellows, and browns with soft textures.

4.1.1.7 Visual Quality

In terms of vividness, the project site does not contain highly memorable visual elements. While there are undeveloped grass fields surrounding the church and school buildings, several other parcels in the project area include undeveloped grass fields or fields at the adjacent school which do not make the on-site fields stand out as a unique or memorable feature. The steeple on the on-site church building is a focal point due to its form and height but it also is not a unique or memorable feature because there are several other church buildings with steeples in the project area. The two school buildings are low-lying structures that do not contain particularly distinctive or unique architectural elements. The playground and basketball court affiliated with the school are consistent with other schools in the project area. Given the project site is within a developed area with similar visual elements, it results in a moderately low vividness rating.

The project area contains a variety of land uses and exhibits a development pattern characteristic of a suburban community, which provides some degree of intactness. There are very few natural elements that encroach into the built environment of the area, but there are some undeveloped fields and limited water features that minimally disrupt the intactness of the built environment. The intactness of the project site is therefore considered moderate. Given the mix of uses, the buildings within the project area vary in terms of architectural style, size, color, configuration, and age. Some pockets of relatively homogenous blocks are evident, particularly where uses are grouped together (such as residential neighborhoods and office buildings), but the overall visual mosaic contributes to moderate unity. While there are some natural features present, they are generally isolated and are surrounded by built components.

The overall existing visual quality of the project site and project area is moderately low given the moderately low degree of vividness and moderate rating of intactness and unity.

4.1.2 Regulatory Framework

4.1.2.1 State Regulations

California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California Legislature to preserve and protect scenic highway corridors from changes that would diminish the

aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. The designation of a highway as scenic is based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the travelers' enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

4.1.2.2 Local Regulations

City of Escondido General Plan

The General Plan Resource Conservation Element identifies the visual importance of preserving scenic open space features such as ridgelines, unique landforms, and steep slopes in the City's viewshed. The Land Use and Community Form Element prioritizes preserving the unique community character of Escondido, including the historic downtown, agricultural areas, valleys, and mountains. The Land Use and Community Form Element also addresses the issues of light pollution and glare. As indicated above, there are no scenic visual resources on the project site and the site is not located adjacent to a scenic roadway. The applicable policies from these elements are identified below.

Land Use and Community Form Element

- **Community Character Policy 1.1**: New development should serve to reinforce the City's present development pattern of higher-intensity development within the downtown area and lower-intensity development in outlying areas. As a guide toward accomplishing this objective, new development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses. This policy shall limit density transfers from constrained portions of a property as defined in the land use and open space goals.

- **Community Character Policy 1.3**: Focus development into areas where land use changes achieve the community's long-term goals. Facilitate development that is consistent with the build out vision for each area through incentive programs and efficient administrative and discretionary approval processes for plot plans, Planned Developments, Area Plans, Specific Plans, and Zoning Overlays.

- **Community Character Policy 1.5**: The city should maintain its single-family residential development pattern, except in locations such as the downtown, along major transportation corridors, and around commercial and public activity centers, where higher densities are more appropriate.

- **Community Character Policy 1.10**: Reduce light pollution and preserve views of the night sky through the design and siting of light fixtures to minimize light spill-over onto adjacent properties.

- **Community Character Policy 1.11**: Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).

Resource Conservation Element

- **Visual Resources Policy 3.1**: Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state, to the extent possible.

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

- **Visual Resources Policy 3.3**: Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.

- **Visual Resources Policy 3.6**: Require that development within the I-15 corridor be located and designed in consideration of its potential visual impacts and preservation of prominent views along the corridor that include: outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings. Require development proposals within the I-15 scenic corridor (defined as the area within 1,750 feet of the freeway) to include a visual assessment and conform to the community design policies which address (a) The siting of new structures outside of significant viewshed corridors; (b) The protection of hillsides and ridgelines; and (c) The need to blend developments with their setting in terms of height and scale.

Escondido Municipal Code

Open Space Development Standards

Article 5, the Open Space Development Standards of the City's Zoning Ordinance, establishes standards for the development of lands identified as having open space value to the community and its citizens in one or more of the following categories: slopes greater than 15 percent, vegetation conservation areas, and natural drainage courses not otherwise defined as floodways. All developments proposed on these lands must follow certain development standards, including protecting natural features such as rock outcroppings, creeks and other natural drainage courses, and wooded areas; and performing grading for buildings and roads to follow existing site terrain contours, except as necessary for safety.

Outdoor Lighting Ordinance

Article 35 of the City's Zoning Ordinance, referred to as the Escondido Outdoor Lighting Ordinance, is intended to minimize glare, light trespass, and artificial sky glow for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. In Section 33-713, the ordinance defines requirements for outdoor lighting, such as shielding, automatic timing devices, and requiring that certain outdoor light fixtures and lamps be turned off at night.

Grading and Erosion Control Regulations

The purpose of Article 55, the Grading and Erosion Control article of the City's Zoning Ordinance, is to assure that development occurs in a manner which protects the natural and topographic character and identity of the environment, the visual integrity of hillsides and ridgelines, sensitive species and unique geologic/geographic features, and the health, safety, and welfare of the general public by regulating grading on private and public property and providing standards and design criteria. In addition to establishing design criteria for grading on steep slopes and ridgelines, the article recommends that grading designs be sensitive to natural topographic, cultural, or environmental features, as well as mature and protected trees, by preserving the following features in permanent open space easements, or such other means which will assure their preservation: undisturbed steep slopes (over 35 percent); riparian areas, mitigation areas, and areas with sensitive vegetation or habitat; unusual rock outcroppings; other unique or unusual geographic features; and significant cultural or historical features.

The grading and erosion control regulations also include provisions for the protection of mature trees. Section 33-1052 of the City's Municipal Code includes definitions for a "mature tree" and a "protected tree." Section 33-1068 of the City's Zoning Code establishes regulations and standards for the preservation, protection, and selected removal of mature and protected trees. Pursuant to Section 33-1069, every feasible effort and measure to avoid damage to existing trees to remain on site must be taken by the owner and developer during clearing, grading, and construction activities. Section 33-1069 also includes replacement ratios for mature and protected trees; mature trees shall be replaced at a minimum one to one (1:1) ratio, while protected trees shall be replaced at a minimum two to one (2:1) ratio.

4.1.3 Thresholds of Significance

Thresholds used to evaluate potential aesthetics impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant aesthetics impact could occur if implementation of the proposed project would:

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

d. Create new source of substantial light and glare, which would adversely affect day and nighttime views in the area.

4.1.4 Methodology and Assumptions

Aesthetics impacts are identified through describing the existing visual setting, assessing the amount of change that would occur as a result of the proposed project, and interpreting how the affected public would respond to or perceive those changes. The analysis and methodology are largely based on the concepts and visual assessment guidelines contained in the Federal Highway Administration (FHWA)'s *Visual Impact Assessment for Highway Projects* (FHWA 2015), as well conformance with applicable City

guidelines, plans, and regulations that govern visual resources. The assessment utilized data from observations, a spatial analysis, and a photographic inventory of the project site and larger visual environment of the project area.

4.1.5 Project Impact Analysis

4.1.5.1 Scenic Vistas

Would the project have a substantial effect on a scenic vista?

Impact Discussion

There are no designated scenic vistas, views, or view corridors on, near, or in the vicinity of the project site. The Resource Conservation Element of the City's General Plan defines scenic visual resources within the City to include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas. The project site is not located in an area identified in the General Plan as an important intermediate ridgeline, skyline ridge, or other prominent natural landform (City of Escondido 2012a, Figure VII-5). The closest identified resource is an intermediate ridgeline that runs along the east side of I-15 more than 500 feet north of Felicita Road. Project elements would not obstruct viewsheds of these identified scenic resources given the distance and presence of intervening development, vegetation, and/or topography.

The City has also identified several scenic roadways in the City, as identified in Section 4.1.1.4. The project site is located near one of these scenic roadways, the I-15 corridor, at a distance of approximately 120 feet to the west (at its closest point). Scenic views within the I-15 corridor are defined in General Plan Resource Conservation Element as the area within 1,750 feet of the freeway and include continuous panoramic views of the valley floor, surrounding ridges, Lake Hodges Reservoir, and visually dominant features such as undisturbed hillsides or steep slopes with rock outcroppings. While some distant peaks and ridgelines are partially visible from certain vantagepoints within the general project area, continuous panoramic views of these features are not available from the project site and surrounding roadways. Thus, project elements upon construction would not obstruct the visual attributes that contribute to its designation as a scenic roadway. As such, the proposed project would not have a substantial adverse effect on a scenic vista.

Level of Significance Prior to Mitigation

Aesthetics impacts related to scenic vistas resulting from project implementation would be less than significant.

Mitigation Measures

No significant aesthetics impacts related to scenic vistas would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to scenic vistas would remain less than significant.

4.1.5.2 Scenic Resources

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

Impact Discussion

There are no highways in the project vicinity or in the City that are officially designated or eligible for listing as a scenic highway. The closest officially designated State Scenic Highway is SR 78 through the Anza-Borrego Desert State Park, approximately 35 miles east of the City, and the closest eligible highway is SR 76 approximately 17 miles to the north. Due to distance, the project is not visible from these designated or eligible scenic highways.

There are no distinctive or landmark trees or mature stands of trees within the project site or surrounding area. A few ornamental trees occur along the project frontage of Brotherton Road and within the site, some of which are mature; however, these are not considered protected visual resources. There are no rock outcroppings within the site. While the site contains one existing building (the church) that would be demolished, it is not identified as a historic building. The two existing school buildings would remain but would be modified to connect with the new church building. These buildings are also not considered historic (refer to Section 4.4, *Cultural Resources*). No other notable scenic resources occur on the site or in the immediate vicinity. Therefore, the project would not substantially damage scenic resources.

Level of Significance Prior to Mitigation

Aesthetics impacts resulting from project implementation related to scenic resources would be less than significant.

Mitigation Measures

No significant aesthetics impacts related to scenic resources would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to scenic resources would remain less than significant.

4.1.5.3 Visual Character and Quality

Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, impacts may be significant if the project conflicts with applicable zoning and other regulations governing scenic quality.

Impact Discussion

<u>Zoning and Regulations Governing Scenic Quality</u>

The project site is located in a developed area that meets the criteria of an “urbanized area” as defined in PRC 21071, which defines the term “urbanized area” for the purposes of CEQA to mean an incorporated

city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to U.S. Department of Commerce Bureau of the Census (U.S. Census Bureau) data from 2022, the City has a population of 150,270 (U.S. Census Bureau 2022). Thus, under CEQA, the project site would be considered within an urbanized area as defined by PRC 21071, with an applicable threshold for evaluation of visual character and quality impacts based on consistency with applicable zoning and other regulations governing scenic quality. The applicable regulations governing scenic quality include relevant policies in the Land Use and Community Form and Resource Conservation Elements of the General Plan, development regulations of the proposed zone, open space development standards of the municipal code, outdoor lighting ordinance, and grading and erosion control regulations of the municipal code.

General Plan

The project would be consistent with applicable General Plan goals and policies that govern scenic quality, as summarized in Table 4.1-1, *Project Consistency with General Plan Visual Resources Policies*. These are contained in the Community Form and Resource Conservation Elements.

Table 4.1-1
PROJECT CONSISTENCY WITH GENERAL PLAN VISUAL RESOURCES POLICIES

Policy	Consistency Analysis
Land Use and Community Form Element	
Community Character Policy 1.1: New development should serve to reinforce the City's present development pattern of higher-intensity development within the downtown area and lower-intensity development in outlying areas. As a guide toward accomplishing this objective, new development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses. This policy shall limit density transfers from constrained portions of a property as defined in the land use and open space goals.	**Consistent**. The site is located along the I-15 corridor and a major roadway (Felicita Road), with other major roadways nearby, including Citracado Parkway and Centre City Parkway. Land uses within the project area are predominantly single-family residential but commercial and institutional uses with larger buildings at higher development intensities are concentrated along these major roadways. Some of these are adjacent to the site or are in close proximity, such as Miller Elementary School across the street to the northeast, a nursing facility just west of the school, churches to the north and south, an assisted living facility to the southwest, and commercial office buildings to the southeast. The project would be at a higher density than nearby residential developments, but this area of the City is envisioned with more intense development as it is within the Felicita Corporate Office Target Area.
Community Character Policy 1.3: Focus development into areas where land use changes achieve the community's long-term goals. Facilitate development that is consistent with the build out vision for each area through incentive programs and efficient administrative and discretionary approval processes for plot plans, Planned Developments, Area Plans, Specific Plans, and Zoning Overlays.	**Consistent**. The project site is currently designated for office uses, and the applicant proposes a General Plan Amendment and rezone to allow for residential use. The site is located along the I-15 corridor and a major roadway (Felicita Road), with other major roadways nearby (Citracado Parkway, Centre City Parkway). Land uses along these roadways vary and include a mix of commercial and institutional developments that include larger buildings and densities than single-family neighborhoods. The project would be at a

Policy	Consistency Analysis
	higher density than nearby residential developments, but this area of the City is envisioned with more intense development as it is within the Felicita Corporate Office Target Area.
Community Character Policy 1.5: The city should maintain its single-family residential development pattern, except in locations such as the downtown, along major transportation corridors, and around commercial and public activity centers, where higher densities are more appropriate.	**Consistent**. The project site is located along major roadways and the I-15 corridor that includes a mix of land uses and higher density development and is therefore appropriate thereon. While single-family residential is the predominant land use in the project area, other development types occur both surrounding the site and beyond.
Community Character Policy 1.10: Reduce light pollution and preserve views of the night sky through the design and siting of light fixtures to minimize light spill-over onto adjacent properties.	**Consistent**. Consistent with Article 35 of the zoning ordinance (Chapter 33 of the Escondido Municipal Code), all exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded so that nighttime lighting is reduced at adjacent properties. Refer to Section 4.1.5.4 for additional details.
Community Character Policy 1.11: Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).	**Consistent**. Residential building materials would include plaster exterior walls with stone and wood accents and terra cotta tile roofs, which are not sources of glare. Similarly, the new church building would include stone and wood accents with a flat, concrete roof, which is not a source of glare. Glass, which can be a source of glare, would be limited to windows typical of residential and church construction. Refer to Section 4.1.5.4 for additional details.
Resource Conservation Element	
Visual Resources Policy 3.1: Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state, to the extent possible.	**Consistent**. The project site does not contain scenic visual resources. Project implementation would not obstruct views of, or otherwise substantially affect, identified scenic resources in the project area or beyond. Refer to Sections 4.1.5.1. and 4.1.5.2 above.
Visual Resources Policy 3.2: Require new development to avoid obstructing views of, and to minimize impacts to significant visual resources through the following: creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks.	**Consistent**. The project site does not contain scenic visual resources. Project implementation would not obstruct views of, or otherwise substantially affect, identified scenic resources in the project area or beyond. Refer to Sections 4.1.5.1. and 4.1.5.2 above.
Visual Resources Policy 3.3: Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.	**Consistent**. The project would be consistent with applicable development standards of the proposed R-5-30 zone (refer to the discussion below under "Municipal Code–R-5-30 Development Regulations"). Additionally, the project site does not contain scenic visual resources, nor would it obstruct views of, or otherwise substantially affect identified scenic

Policy	Consistency Analysis
	resources in the project area or beyond. Refer to Sections 4.1.5.1. and 4.1.5.2 above.
Visual Resources Policy 3.6: Require that development within the Interstate 15 corridor be located and designed in consideration of its potential visual impacts and preservation of prominent views along the corridor that include: outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings. Require development proposals within the I-15 scenic corridor (defined as the area within 1,750 feet of the freeway) to include a visual assessment and conform to the community design policies which address: a) The siting of new structures outside of significant viewshed corridors; b) The protection of hillsides and ridgelines; and c) The need to blend developments with their setting in terms of height and scale.	**Consistent**. This section of the EIR (4.1) provides a visual assessment of the project. As concluded in this section, project implementation would not obstruct views of, or otherwise substantially affect, identified scenic resources in the project area or beyond. Refer to Sections 4.1.5.1. and 4.1.5.2 above.

Municipal Code – R-5-30 Zone Development Regulations

The project site is currently zoned residential estate, with a zone classification of R-E, but the applicant proposes to rezone the site to R-5-30, very high multiple residential, to correspond with the proposed General Plan Amendment to Urban V. The R-5-30 zone is intended for higher density multi-family residential uses such as the proposed project.

The design of the proposed residential and church developments would be consistent with applicable development regulations of the proposed R-5-30 zone pertaining to visual character, such as height limitations, building stories, lot coverage, and setbacks. The height limit for buildings in the R-5-30 zone is 75 feet, and the tallest proposed residential building would be approximately 50 feet. The church's steeple, its tallest element, would be approximately 43 feet tall. The maximum allowable number of building stories is four. The proposed residential buildings would be three to four stories. The proposed clubhouse/leasing center building would be two stories, and the proposed pet spa would be one story. The proposed church building would be two stories. The existing school buildings, both two stories tall, would remain in compliance. The R-5-30 zone does not have a maximum percent lot coverage. Minimum setbacks per the R-5-30 zone include 15 feet for the front, 5 feet for the side, and 10 for the rear. The proposed buildings would be consistent with these required setbacks. Based on the above, the proposed project would not conflict with applicable zoning regulations governing scenic quality.

Municipal Code – Open Space Development Standards

The project would not conflict with the City's Open Space Development Standards, as contained in Article 5 of the City's Zoning Ordinance. These standards apply to the development of land identified in the General Plan as having open space value that include slopes greater than 15 percent, vegetation conservation areas, and natural drainage courses not otherwise defined as floodways.

The project site is not designated open space or identified as having open space value. The site is developed on a building pad and surrounded by vacant land covered with low-lying grasses. No vegetation

conservation areas or natural features that are considered scenic visual resources occur on the site. The site contains a drainage swale, but as discussed in Section 4.1.1.3, this feature is a natural-bottom channel that is relatively narrow, shallow, and sparsely vegetated with low-growing perennial species and has intermittent water flow. As such, it is not considered a scenic visual resource. The site does contain some slopes that have a grade of 15 percent or higher, but these are mainly associated with manufactured slopes along the edges of the building pad where the church and parking are developed. Additional small slopes of 15 percent or more occur along the banks of the drainage swale, around the fenced well, and two small mounds in the southwestern portion of the site. These existing slopes are primarily man-made and do not appear as natural landforms characteristic of an open space area. As such, the project would not conflict with the Open Space Development Standards pertaining to scenic quality.

Municipal Code – Outdoor Lighting Ordinance

The project would include nighttime exterior lighting for safety, security, and circulation purposes. As discussed in more detail in Section 4.1.5.4 below, the project would be consistent with the Outdoor Lighting Ordinance requirements, as contained in Chapter 33, Article 35 of the City's Municipal Code. Exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded to minimize spillover of nighttime lighting onto adjacent properties or the nighttime sky. Accordingly, the project would not conflict with the Outdoor Lighting Ordinance as it pertains to scenic quality.

Municipal Code – Grading and Erosion Control Regulations

The project would not conflict with the grading and erosion control regulations contained in Chapter 33, Article 55 of the City's Municipal Code. These regulations require that grading designs be sensitive to natural topographic, cultural, or environmental features, as well as mature and protected trees, by preserving undisturbed steep slopes (over 35 percent); riparian areas, mitigation areas, and areas with sensitive vegetation or habitat; unusual rock outcroppings; other unique or unusual geographic features; and significant cultural or historical features. The project site does not contain any hillsides or ridgelines; it is relatively flat due to prior development. Some slopes greater than 35 percent occur on the site, including along the manufactured slopes of the existing building pad, the northern extent of the drainage swale, and two small mounds in the southwestern portion of the site. These slopes are almost all man-made and do not appear as natural landforms characteristic of notable scenic resources. While there is a drainage swale that traverses the site, it does not support riparian vegetation or other features that provide scenic value. On-site sensitive vegetation includes emergent wetland species and non-native grassland, which are generally groundcovers that do not consist of mature vegetation or notable vertical elements. No unusual rock outcroppings, unique geographic features, or significant cultural/historical resources occur within the project site.

In accordance with Municipal Code Section 33-1052, a protected tree is any oak which has a 10 inch or greater diameter at breast height, or any other species or individual specimen listed on the local historic register or determined to substantially contribute to the historic character of a property or structure listed on the local historic register. No oak trees occur on site and the property is not eligible for listing in the historic register (HELIX 2024a); therefore, no protected trees occur on the project site. The project would remove some existing on-site ornamental trees, but the project would plant a total of 682 new trees (359 on the residential site and 323 on the church site) of varying sizes, which would replace the removed trees above the required ratios in the Grading and Erosion Control Regulations discussed above.

Based on the above, the project would not conflict with the grading and erosion control regulations pertaining to scenic quality.

Summary

As discussed above, the proposed project would be consistent with applicable policies governing scenic quality contained in the City's General Plan (Land Use and Community Form and Resource Conservation Elements) and Municipal Code, including those within the R-5-30 zone development regulations, open space development regulations, outdoor lighting ordinance, and grading and erosion control regulations.

Changes to Visual Character and Quality

Although the project is, by definition under CEQA, within an urbanized area with a corresponding applicable significance threshold to evaluate visual character and quality impacts based on consistency with zoning and other regulations that govern scenic quality, the applicant proposes a General Plan Amendment (to change the land use designation from Planned Office to Urban V) and a rezone (to change the zone from R-E to R-5-30) to allow for residential uses on the site and for the continued church use. Given the proposed land use change, the project has also been evaluated for aesthetics impacts relative to resulting changes to the existing visual character and quality.

Landform Alteration

The project site is developed and/or disturbed, with the existing church, school buildings and parking lot constructed on an elevated building pad that is approximately 10 to 15 feet above the undeveloped/disturbed portions of the site. The building pad includes relatively uniform, linear manufactured slopes along its edges. No notable or prominent landforms occur on the site. Some slopes greater than 35 percent occur on the site, including along the manufactured slopes of the existing building pad, the northern extent of the drainage swale, and two small mounds in the southwestern portion of the site. These slopes are almost all man-made and do not appear as natural landforms characteristic of scenic visual resources. While there is a drainage swale that traverses the site, it is a relatively flat feature with topographic variation limited to the area of the outlet structure at the headwall, just south of Brotherton Road. Most of the swale has a subtle downslope gradient over the site.

The site would be graded with some cut and fill to provide a relatively level development pad. It is anticipated that grading would involve 71,260 CY of cut and 24,760 CY of fill for the residential site and 5,050 CY of cut and 44,400 CY of fill for the church site. Given that no notable landforms occur on the site and that project development would occur on a level pad similar to existing conditions, project implementation would not result in a substantial change to existing landforms.

Development Patterns and Building Forms

The proposed project would entail the redevelopment of a portion of an existing church property with a multi-family residential development and new church building on a 14.83-acre site in an area that contains predominantly residential uses but also commercial and institutional uses along major transportation corridors (i.e., Felicita Road, Citracado Parkway, and Centre City Parkway). The proposed residential development would be at a greater scale compared to existing residential development in the immediate surrounding area, but the mass and scale of the proposed buildings would not be out of character within the context of the broader project area. The proposed church development would be similar in size, form, and scale to other churches in the project area. There are several larger buildings that range in size and scale along Felicita Road, Brotherton Road, Citracado Parkway, and Centre City Parkway, some of which are adjacent to the site or in close proximity, ranging from approximately 400 to 1,500 feet away. In general, the development pattern of the broader project area is characterized by commercial and

institutional uses interspersed with residences along major roadways and single-family residential neighborhoods along local residential streets that stem from these major roadways. Some multi-family housing occurs along major roadways too, including Brotherton Road (approaching Centre City Parkway), Citracado Parkway (approaching Centre City Parkway), and Centre City Parkway. Consistent with this development pattern, the proposed project would provide a higher density development in the broader project area along a major roadway that already contains larger buildings among residential neighborhoods.

Building forms associated with the proposed residential buildings would not substantially contrast with existing buildings in the project area. The applicant proposes 10 multi-story residential buildings that include four different building types that vary in size and form. Two Type A buildings would be constructed along the Brotherton Road frontage, each encompassing approximately 13,000 SF with three stories at a height of approximately 38 feet. Type A buildings generally would be rectangular in overall form. Two Type B buildings would be constructed along the Felicita Road frontage, each with three stories at a height of approximately 38 feet and encompassing 20,500 SF. Type B building forms would be long, narrow, rectangular, and linear in nature. Four Type C buildings would be constructed, including two adjacent and parallel to the Type B buildings in the western portion of the site and two near the eastern site boundary. Type C buildings would each encompass approximately 27,000 SF and include three stories at an approximate height of 38 feet. Type C buildings would be rectangular and similar to Type B buildings but wider. Two Type D buildings would be constructed in the central portion of the site and each would be four stories at an approximate height of 49 feet and approximately 87,000 SF. Type D buildings would be U-shaped with a north and south wing separated by a drive aisle. The project also would construct a two-story club house/leasing center in the center of the site and a small one-story pet spa and maintenance garage in the eastern portion of site between two residential buildings. Three one-story, 1,000 SF garage buildings would be constructed in the northeastern portion of the Brotherton Road frontage, and 53 carport stalls with overhangs approximately 13 feet high would line the residential site's eastern boundary. The configuration and general forms of the proposed buildings (from a plan view perspective) are shown in Figure 3-1, *Alexan Escondido Site Plan*.

Building forms associated with the proposed church building also would not substantially contrast with existing buildings in the project area. The applicant proposes to demolish the site's existing church building and reconstruct a new church building east of, and connected to, the site's two existing school buildings. The new church building would be rectangular in overall form and encompass approximately 22,691 SF. With the existing school buildings attached, the new church site would total approximately 34,000 SF. The church building would reach approximately 29 feet tall, and the steeple would give the church site a total height of 43 feet. The configuration and general forms of the proposed building are shown in Figure 3-2, *Bethel Baptist Church Site Plan*. This is comparable to the existing church building in terms of form and scale (size and height). The existing church building encompasses 24,395 SF with two stories and a steeple.

The proposed buildings in the residential and church sites would incorporate architectural and design treatments characteristic of residential and non-residential buildings in the project area. Existing homes and commercial and institutional buildings in the area are diverse in terms of styles, materials, colors, texture, and age, and the proposed design elements would be consistent with such elements. Residential buildings would exhibit a uniform architectural style, including white plaster exterior walls, terra cotta tile roofs, earth-toned stone veneer accents and siding, gray siding, dark vinyl windows, brown fascia and window trim, brown trellises and guardrails, wood corbels, and decorative clay vents. The church building would involve similar natural elements, including earth-toned accents, wooden exteriors, and stone

details. Planted panels incorporating ivy or other vining plants would be placed around the church building's exterior. Refer to Figures 3-3 through 3-8 for architecture and design treatments. There would be some differences, but building forms would be consistent with the character of existing buildings in the area. The project would not introduce a new land use or new type of building form that does not currently exist in the project area.

Public Views

Views of the project from public vantage points would primarily be available from surrounding local roadways, as well as briefly from the nearby I-15. The largest number of viewers, as well as viewers having the most direct views onto the project site from public viewpoints, would be traveling along I-15, Felicita Road, and Brotherton Road. These views would be open and project elements would be in the foreground and middle ground. Changes to the existing visual character and quality of the project site and surroundings are discussed below for each of these public vantage points.

I-15

Following implementation of the project, views from I-15 into the project site would continue to encompass a developed site but the intensity of development would be greater than the existing view. Existing views encompass a church building elevated on a building pad with manufactured slopes and grass fields in front. Overhead electrical lines and poles are also visible in the foreground that run along Felicita Road and continue over the I-15.

Viewers from this vantage point consist of motorists and passengers traveling at higher speeds (65 miles per hour) along the freeway. Currently, peripheral views are provided for a few seconds from both the northbound and southbound lanes as motorists travel on the Felicita Road overcrossing. Views of the site are not provided beyond the overcrossing due to intervening vegetation. It should be noted that direct views of the site are not provided because of the alignment of freeway compared to the location of the site, which is peripheral to the freeway alignment. Motorists and/or passengers must turn their heads to orient their view towards the site. Given this and the few seconds of visibility from I-15, views are considered very brief and passing and consequently, viewers from this public vantage point would not be expected to be highly sensitive to changes to the visual environment.

Upon construction, this view would change to largely encompass multi-story residential buildings in the middle ground. Buildings would remain the prevalent built environment element but at a closer distance to the viewer and at a greater development intensity given the multiple, multi-story buildings instead of the single church building. The new church building on the eastern portion of the property would not substantially change views in the area, as it would only obscure the distant vegetation and rooflines associated with the adjacent single-family residences. The overhead electrical lines and poles that front the project site would be removed, as they are proposed to be undergrounded by the project; however, this would not be noticeable because the overhead lines would still cross over the freeway, which are in the immediate foreground.

Felicita Road

Views from Felicita Road would be notably different from the existing condition. Currently, views are dominated by the grass fields adjacent to the roadway in the foreground and the elevated church building that is set back from the roadway almost 400 feet in the middle ground. Open views into the site are

provided from Felicita Road as there are no intervening vegetation or other vertical elements along the roadway that obscure views.

Viewers along Felicita Road include motorists and passengers, bicyclists, and pedestrians comprised of both visitors and residents of the area. Existing traffic volumes along Felicita Road, between Brotherton Road and Citracado Parkway, total 13,130 average daily traffic (ADT), and future volumes along this same roadway segment are estimated as high as 14,300 ADT (LLG 2025). Those residing or working in the area would have a more vested interest in changes compared to those just traveling through the area. Viewer exposure would vary depending on the transportation mode and associated speed of travel, with those passing by in automobiles having the shortest view duration to those walking having the longest view duration. These viewer groups are expected to be moderately to highly sensitive to changes in the visual environment.

Following project construction, this view would change to a higher intensity developed site, with visible project elements directly adjacent to the roadway. The project would widen the paved roadway by 17 feet on the east side (project side) and sidewalks and streetscape landscaping would be added that would be in the immediate foreground. Three, three-story residential buildings (two parallel to the roadway and one perpendicular to the roadway near the Brotherton Road intersection) would be constructed along the roadway frontage, albeit set back from the road at least 10 feet, which would be highly visible from the roadway in the foreground. These buildings would be visually dominant elements perceived from the segment of Felicita Road directly adjacent to the project site. Proposed street trees along the frontage would soften views of built environment elements and break up the mass of the project buildings from the roadway. Views from segments to the north and south (i.e., approaching the project site from either direction) would encompass the new buildings but within a broader viewshed that would include other elements in the context of the existing visual landscape.

Brotherton Road

Views from Brotherton Road generally encompass the roadway, streetside landscaping, wooden utility poles with overhead lines, and fields in the foreground; fields, asphalt driveways and parking areas, on-site landscaping, the church building, and adjacent school buildings are located in the middle ground. The existing on-site buildings are set back from Brotherton Road approximately 100 feet.

Viewers along Brotherton Road include motorists and passengers, bicyclists, and pedestrians that consist of residents and visitors of the area. Existing traffic volumes along Brotherton Road, between Felicita Road and Miller Road, total 930 ADT, and future volumes along this same roadway segment are estimated as high as 1,730 ADT (LLG 2025). As mentioned above, residents or employees of the area would have a greater vested interest in changes to the project site than those passing through the area on this roadway. Viewer exposure would vary depending on the transportation mode and associated speed of travel; motorists would have the shortest duration and pedestrians would have the longest view duration. These viewer groups are expected to be moderately to highly sensitive to changes in the visual environment.

Upon project construction, this view would change to a more developed site at a greater intensity. Visible project elements adjacent to the roadway would include streetscape landscaping in the immediate foreground and four, three-story residential buildings, as well as a driveway. Additional visual project elements would include the new church building and its two associated driveways and streetscape landscaping. The buildings would be set back from the roadway by at least 10 feet but would appear as visually dominant elements from the Brotherton Road project frontage. Proposed street trees along the

frontage would soften views of built environment elements and break up the mass of the project buildings from the roadway. Similar to Felicita Road, views from segments to the west and east (i.e., approaching the project site from either direction) would encompass the new buildings but within a broader viewshed that would include other elements in the context of the existing visual landscape.

Summary

The project would result in a moderate to high level of change to the existing visual character from these public viewpoints. The existing elevated church building, manufactured slopes, grass fields, and overhead electric lines and poles would be replaced with a higher density, multi-story residential development and new church building. While the character would change substantially, the proposed project would consist of a cohesive development with a uniform architectural style and design elements compatible with existing development in the project area. Larger, multi-story buildings occur in the project area, and the project would not introduce a new type of land use or buildings that would severely contrast with existing buildings in the project area in terms of mass and scale. Building forms and design elements would be compatible with these existing elements in terms of line, color, texture, treatments, styles. Proposed landscaping would also be visually compatible with surrounding development and would provide for increased visual unity throughout the site and vicinity. The architectural design would provide for increased vividness as the buildings would be more memorable compared to the existing building. The configuration of the proposed residential development with its similar building forms and incorporation of common design elements would increase the intactness of the site upon project development. Similarly, the new church building would provide a more cohesive visual and structural arrangement with the two existing school buildings. Additionally, the provision of more residential housing in a predominantly residential area with larger, higher intensity developments concentrated along major roadways (as the project would provide) would increase visual unity on the project site and would be consistent with, and not degrade, the existing visual unity in the project area.

Overall, project implementation would increase the visual unity, vividness, and intactness of the project site. As noted above, the visual character of the site from public views along Felicita Road and Brotherton Road and to a lesser extent I-15 would substantially change; however, these changes would not substantially degrade the existing visual quality of the site or surroundings for the reasons discussed above.

Construction Period Impacts

Views of the site during construction would include grading and construction activities, presence of construction vehicles and workers, and storage of building materials. These short-term elements could temporarily reduce the existing visual quality of the site during the construction period due to the introduction of additional visually contrasting features, such as construction fencing, construction equipment, and construction materials stockpiling and storage. Open views would be particularly available from Felicita Road, Brotherton Road, and I-15 Felicita Road Overcrossing, as well as from other local roadways at higher elevations. Associated changes to the visual environment caused by construction would be temporary in nature and would be removed upon completion of construction.

Level of Significance Prior to Mitigation

Aesthetics impacts resulting from project implementation related to visual character and quality would be less than significant.

Mitigation Measures

No significant aesthetics impacts related to visual character and quality would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to visual character and quality would remain less than significant.

4.1.5.4 Light and Glare

Would the project create new source of substantial light and glare, which would adversely affect day and nighttime views in the area?

Impact Discussion

There are two primary artificial sources of light that generally affect a built environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear night sky depending on the location of the light sources and its proximity to nearby light-sensitive areas.

The project site is in a developed area that contains a mix of uses, which are mostly residential. The existing light sources in the project area include streetlights and vehicle lights along surrounding roadways, as well as from interior and exterior building lighting emanating from the existing buildings both on site and on the surrounding properties. The proposed project would include the introduction of new lighting at a developed site with existing light sources. Nighttime exterior lighting would be provided on the residential and church sites for safety, security, and circulation purposes. Consistent with Article 35 of the zoning ordinance (Chapter 33 of the Escondido Municipal Code), all exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded so that unnecessary nighttime lighting and glare are reduced for the benefit of the citizens of the city and astronomical research at Palomar Mountain Observatory.

Glare impacts can occur when artificial light or sunlight reflects off a surface, creating a harsh, intensely bright effect. Glare can create discomfort or present safety concerns. As discussed in the Project Description in Chapter 3, *Project Description*, residential building materials would include plaster exterior walls with stone and wood accents and terra cotta tile roofs. The church building materials would be similar, but the structure would have a flat, concrete roof. These architectural elements are not sources of glare. Glass would be limited to windows, typical of residential and church construction, and no other highly reflective surfaces would be constructed. The extent and surface area of glass on the homes and church would not be at a scale to generate adverse glare effects. As such, the project would not create a new source of glare that would adversely affect views in the area.

Level of Significance Prior to Mitigation

Aesthetics impacts resulting from project implementation related to light and glare would be less than significant.

Mitigation Measures

No significant aesthetics impacts related to light and glare would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to light and glare would remain less than significant.

4.2 Air Quality

This section provides an analysis of potential air quality impacts resulting from construction and operation of the proposed project. The existing conditions and regulatory framework related to air quality are also provided in this section. The following analysis primarily relies on the assessment of potential air quality impacts presented in the project's Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), which is included as Appendix B to the EIR.

4.2.1 Existing Conditions

The project site occurs in the northern portion of the County of San Diego in the City of Escondido, which is located within the San Diego Air Basin (SDAB). Air quality in the SDAB is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by CARB at the state level, and by the San Diego County Air Pollution Control District (SDAPCD) at the regional level.

The project site is in a developed area with a mixture of land uses primarily comprised of residential neighborhoods. The project site is currently developed with a church building, two private education buildings, and surface parking. Surrounding development includes Felicita Road to the west, Brotherton Road to the north, single-family homes (along Miller Avenue) to the east, and single-family homes along Palm Terrace and agricultural uses along Miller Avenue to the south.

4.2.1.1 Climate and Meteorology

The climate in southern California, including the SDAB, is controlled largely by the large-scale meteorological condition that dominates the west coast of the United States: a seasonally semi-permanent high-pressure cell centered over the northeastern Pacific Ocean, called the Pacific high, which keeps most storms from affecting the California coast. Areas within 30 miles of the coast in the San Diego region, including the project site, experience moderate temperatures and comfortable humidity.

Temperature inversion layers (inversions; layers of warmer air over colder air) affect air quality conditions significantly because they influence the mixing depth (i.e., the vertical depth in the atmosphere available for diluting air contaminants near the ground). The highest air pollutant concentrations in the SDAB generally occur during inversions. During the summer, air quality problems in the SDAB are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and nitrogen dioxide (NO_2) react under the strong, abundant sunlight in the San Diego region, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_2 emissions. High NO_2 levels usually occur during autumn or winter, on days with summer-like conditions.

The predominant wind direction in the vicinity of the project site is from the west and the average wind speed is approximately 4.9 miles per hour (mph; Iowa Environmental Mesonet 2023). The annual average maximum temperature in the project area is approximately 75 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 52°F. Total precipitation in the project area averages approximately 13 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center 2024).

4.2.1.2 Air Pollutants of Concern

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the public. In general, criteria air pollutants include the following compounds:

- Ozone (O_3)
- Carbon monoxide (CO)
- Nitrogen dioxide (NO_2)
- Particulate matter (PM), which is further subdivided:
  - Coarse PM, 10 microns or less in diameter (PM_{10})
  - Fine PM, 2.5 microns or less in diameter ($PM_{2.5}$)
- Sulfur dioxide (SO_2)
- Lead (Pb)

Criteria pollutants can be emitted directly from sources (primary pollutants, e.g., CO, SO_2, PM_{10}, $PM_{2.5}$, and lead), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., ozone, NO_2, PM_{10}, and $PM_{2.5}$). PM_{10} and $PM_{2.5}$ can be both primary and secondary pollutants. The principal precursor pollutants of concern are reactive organic gases (ROGs), which are also known as volatile organic compounds (VOCs),[1] and nitrogen oxides (NO_X). A summary of major sources and general health effects for each of the criteria air pollutants are shown in Table 4.2-1, *Common Sources and Human Health Effects of Criteria Air Pollutants*.

Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local meteorology and atmospheric conditions, and the number and characteristics of exposed individuals (e.g., age, gender). Criteria pollutant precursors (ROG and NO_X) affect air quality on a regional scale, typically after significant delay and distance from the pollutant source. Health effects related to ozone and NO_2 are, therefore, the product of emissions generated by numerous sources throughout a region. Emissions of criteria pollutants from vehicles traveling to or from the project site (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel. As such, specific health effects from these criteria pollutant emissions cannot be meaningfully correlated to the incremental contribution from the project.

[1] CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

Table 4.2-1
COMMON SOURCES AND HUMAN HEALTH EFFECTS OF CRITERIA AIR POLLUTANTS

Pollutant	Major Anthropogenic Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO_X) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM_{10} and $PM_{2.5}$)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CARB 2024a; USEPA 2024a

Toxic Air Contaminants

California Health and Safety Code (H&SC) Section 39655(a) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal Clean Air Act (CAA) (42 United States Code [U.S.C.] Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is 2.5 microns or less in diameter (CARB 2024b). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California's population—it is estimated that about 70 percent of total known cancer risk related to air toxics in California is attributable to DPM (CARB 2024b).

4.2.1.3 Existing Air Quality

Attainment Designations

The USEPA has classified air basins (or portions thereof) as being in "attainment," "nonattainment," "maintenance," or "unclassified" for each criteria air pollutant, based on whether or not the area achieves the National Ambient Air Quality Standards (NAAQS). Similar designations are made at the state level based on each air basin's achievement of the California Ambient Air Quality Standards (CAAQS).

Upon attainment of a standard for which an area was previously designated nonattainment, the area will be classified as a maintenance area. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. The project site is located within the SDAB and, as such, is in an area designated as a nonattainment area for certain pollutants that are regulated under the CAA. Table 4.2-2, *San Diego Air Basin Attainment Status*, lists the federal and state attainment status of the SDAB for the criteria pollutants. The SDAB, including the project site, is a federal and state nonattainment area for ozone and a state nonattainment area for PM_{10} and $PM_{2.5}$.

Table 4.2-2
SAN DIEGO AIR BASIN ATTAINMENT STATUS

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	Attainment[1]	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM_{10}	Unclassifiable[2]	Nonattainment
$PM_{2.5}$	Attainment	Nonattainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment

Criteria Pollutant	Federal Designation	State Designation
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassified
Visibility	(No federal standard)	Unclassified

Source: SDAPCD 2024

[1] The federal 1-hour standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

CO = carbon monoxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide

Monitored Air Quality

The SDAPCD operates a network of ambient air monitoring stations throughout the San Diego region. The purpose of the monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets the CAAQS and NAAQS. The nearest ambient monitoring station to the project site is the Rancho Carmel Drive monitoring station located approximately 8.4 miles south of the project site. However, the Rancho Carmel Drive monitoring station has data from the last three years for $PM_{2.5}$ and NO_2 concentrations. The San Diego-Kearny Villa Road monitoring station (approximately 17 miles south of the project site) has data for ozone concentrations. There are no monitoring stations in the County with data for PM_{10} for the last three years. Air quality data collected at the three monitoring stations for the years 2022 through 2024 are shown in Table 4.2-3, *Air Quality Monitoring Data*.

Table 4.2-3
AIR QUALITY MONITORING DATA

Pollutant Standard	2022	2023	2024
Ozone (O_3) – Kearny Villa Road			
Maximum concentration 1-hour period (ppm)	0.095	0.091	0.112
Maximum concentration 8-hour period (ppm)	0.083	0.079	0.080
Days above 1-hour state standard (>0.09 ppm)	1	0	2
Days above 8-hour state/federal standard (>0.070 ppm)	2	3	3
Fine Particulate Matter ($PM_{2.5}$) – Rancho Carmel Drive			
Maximum 24-hour concentration (µg/m^3)	14.9	23.2	21.4
Measured Days above 24-hour federal standard (>35 µg/m^3)	0	0	0
Annual average (µg/m^3)	7.6	6.9	7.7
Exceed state and federal annual standard (12 µg/m^3)	No	No	No
Nitrogen Dioxide (NO_2) – Rancho Carmel Drive			
Maximum 1-hour concentration (ppm)	0.056	0.053	0.051
Days above state 1-hour standard (0.18 ppm)	0	0	0
Days above federal 1-hour standard (0.100 ppm)	0	0	0
Annual average (ppm)	0.015	0.013	0.013
Exceed annual federal standard (0.053 ppm)	No	No	No
Exceed annual state standard (0.030 ppm)	No	No	No

Source: CARB 2026a

ppb = parts per billion; ppm = parts per million; µg/m^3 = micrograms per cubic meter

As shown in Table 4.2-3, monitoring data for the 1-hour state ozone standard at the Kearny Villa Road station reported one exceedance in 2022, no exceedances in 2023, and two exceedances in 2024. Monitoring data at the Kearny Villa Road station exceeded the 8-hour state/federal ozone standard on two days in 2022 and on three days in 2023 and 2024. The Rancho Carmel Drive station reported no exceedances of the federal standard for $PM_{2.5}$ in 2022 through 2024, and the annual $PM_{2.5}$ concentration standards were not exceeded during this period. No exceedances of the state or federal standards for NO_2 occurred from 2022 to 2024 (CARB 2026a).

4.2.1.4 Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers.

The closest existing sensitive receptors to the project site are Miller Elementary School located approximately 200 feet northeast of the project site, and the single-family homes surrounding the project site. Additionally, as a residential development, the residential portion of the project would be considered a new sensitive receptor. Similarly, the existing school to remain on the site is a sensitive receptor; however, it would not be operational during construction of the project.

4.2.2 Regulatory Framework

4.2.2.1 Federal Regulations

Federal Clean Air Act

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. The USEPA is responsible for enforcing the CAA of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for several criteria pollutants. Table 4.2-4, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

Table 4.2-4
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM_{10}	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
$PM_{2.5}$[3]	24 Hour	–	35 µg/m³	Same as Primary
	AAM	12 µg/m³	9.0 µg/m³	15.0 µg/m³
CO	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	–
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	–	–
NO_2	1 Hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	–
	AAM	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary
SO_2	1 Hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m³)
	24 Hour	0.04 ppm (105 µg/m³)	–	–
Lead	30-day Avg.	1.5 µg/m³	–	–
	Calendar Quarter	–	1.5 µg/m³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m³	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥ 30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards
Sulfates	24 Hour	25 µg/m³	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m³)	No Federal Standards	No Federal Standards

Source: CARB 2016; USEPA 2024b

[1] National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect public health.

[2] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[3] The AAM primary federal standard for $PM_{2.5}$ was reduced from 12 µg/m³ to 9 µg/m³ by a USEPA final rule issued on February 7, 2024. No change in the state or 24-hour federal standard has occurred as of October 2024.

O_3 = ozone; ppm = parts per million; µg/m³ = micrograms per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; AAM = Annual Arithmetic Mean; $PM_{2.5}$ = fine particulate matter; CO = carbon monoxide; mg/m³ = milligrams per cubic meter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; km = kilometer; – = No Standard

4.2.2.2 State Regulations

California Clean Air Act

The federal CAA allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. CARB, a part of the CalEPA, is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and

barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In addition to primary and secondary CAAQS, the state has established a set of episode criteria for ozone, CO, NO_2, SO_2, and PM. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that actually threaten public health. Table 4.2-2, above, lists the state attainment status of the SDAB for the criteria pollutants. Under state designation, the SDAB is currently in attainment for CO, NO_2, SO_2, lead, and sulfates; unclassified for hydrogen sulfide and visibility reducing particles; and nonattainment for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$ (SDAPCD 2024).

State Implementation Plan

The CAA requires areas with unhealthy levels of criteria pollutants to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain the NAAQS. The 1990 amendments to the CAA set deadlines for attainment based on the severity of an area's air pollution problem.

SIPs are not single documents—they are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations and federal controls. Many of California's SIPs rely on a core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards the SIP revisions to the USEPA for approval and publication in the Federal Register. The Code of Federal Regulations (CFR) Title 40, Chapter I, Part 52, Subpart F, Section 52.220 lists all of the items that are included in the California SIP (CARB 2009). At any one time, several California submittals are pending USEPA approval.

4.2.2.3 Local Regulations

Attainment Plan

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The regional air quality plan for attainment of the NAAQS for the County is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the SIP, outlines SDAPCD's plans and control measures designed to attain the NAAQS for ozone. For attainment of the CAAQS, the SDAPCD must prepare an updated State Ozone Attainment Plan to identify possible new actions to further reduce emissions. Initially adopted in 1992, the Regional Air Quality Strategy (RAQS) identifies measures to reduce emissions from sources regulated by the SDAPCD, primarily stationary sources such as industrial operations and manufacturing facilities. The RAQS is periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures, and was last updated in 2023 (SDAPCD 2023). These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan, RAQS, and SIP.

San Diego County Air Pollution Control District Rules and Regulations

Future development pursuant to the project would be required to comply with SDAPCD Rules and Regulations, which require the incorporation of best management practices (BMPs) during construction to reduce emissions of fugitive dust.

Rule 50 (Visible Emissions)

PM pollution impacts the environment by decreasing visibility (haze). These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of $PM_{2.5}$. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment.

Visibility reduction is one of the most apparent symptoms of air pollution. Visibility degradation is caused by the absorption and scattering of light by particles and gases in the atmosphere before it reaches the observer. As the number of fine particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range. Light absorption by gases and particles is sometimes the cause of discolorations in the atmosphere but usually does not contribute significantly to visibility degradation. Scattering by particulates impairs visibility much more readily. SDAPCD Rule 50 (Visible Emissions) sets emission limits based on the apparent density or opacity of the emissions using the Ringelmann scale (SDAPCD 1997).

Rule 51 (Nuisance)

SDAPCD Rule 51 (Nuisance) states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of the rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals (SDAPCD 1976)

Rule 55 (Fugitive Dust Control)

SDAPCD Rule 55 (Fugitive Dust Control) requires action be taken to limit dust from construction and demolition activities from leaving the property line. Similar to Rule 50 (Visible Emissions), Rule 55 (Fugitive Dust Control) places limits on the amount of visible dust emissions in the atmosphere beyond the property line. It further stipulates that visible dust on roadways as a result of track-out/carry-out shall be minimized through implementation of control measures and removed at the conclusion of each workday using street sweepers (SDAPCD 2009).

Rule 67.0.1 (Architectural Coatings)

Project construction would be required to comply with the SDAPCD Rule 67.0.1 (Architectural Coatings). Effective January 1, 2022, Rule 67.0.1 requires general flat and non-flat coatings (e.g., paint) to have 50 grams per liter (g/L) or less VOC content and traffic marking coatings to have 100 grams per liter or less VOC content (SDAPCD 2021a).

City of Escondido Environmental Quality Regulations

The City's Environmental Quality Regulations (EQR; Section 33-924 of the Escondido Municipal Code) contain pollutant emission screening thresholds. The purpose of the Environmental Quality Regulations is to ensure consistency between the City's thresholds of environmental significance and the Public Facilities Master Plan that implements the growth management element of the General Plan. The pollutant emission criteria provide levels below which pollutant emissions would be considered to have a less-than-significant impact on the environment. The thresholds are described further below in Section 4.2.3.

4.2.3 Thresholds of Significance

Thresholds used to evaluate potential air quality impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant air quality impact could occur if the implementation of the proposed project would:

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

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

c. Expose sensitive receptors to substantial pollutant concentrations; or

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

To determine whether the project would result in a cumulatively considerable net increase of criteria pollutants and precursors, emissions were evaluated based on the quantitative emission screening levels thresholds established by the City's EQRs. The EQRs implement CEQA and the CEQA Guidelines by applying the provisions and procedures contained in CEQA to development projects proposed within the City. Included in the EQRs is City Municipal Code Chapter 33, Article 47, § 33-924(a)(5) which establishes thresholds for projects that individually generate air-quality impacts for fixed, mobile, or construction sources within the City general plan area.

The City's Environmental Quality Regulations do not establish thresholds for the significance of impacts to sensitive receptors resulting from exposure to TACs. SDAPCD Rule 1210 establishes significant health risk thresholds for exposure of individuals to stationary source TAC emissions from a single facility (SDAPCD 2021b). Although developed for evaluation of health risk impacts for facilities with stationary sources of TACS, the thresholds established in SDAPCD Rule 1210 are informative of the magnitude of potential health risks for exposure of individual sensitive receptors to any single source of TACs and are used in this analysis as screening thresholds for potential health risks to future project residents.

The screening criteria screening thresholds described above were used as quantitative thresholds to determine if the project would result in a significant impact to air quality or an adverse effect on human health. The screening thresholds established by City Municipal Code Chapter 33, Article 47, §33-924(a)(5), and SDAPCD Rule 1210 are shown in Table 11, *Screening-level Thresholds for Air Quality Impact Analysis*.

Table 4.2-5
SCREENING THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Emissions Threshold
Construction Emissions (Pounds per Day)	
Respirable Particulate Matter (PM_{10})	100
Fine Particulate Matter ($PM_{2.5}$)	55
Oxides of Nitrogen (NO_X)	250
Oxides of Sulfur (SO_X)	250
Carbon Monoxide (CO)	550
Volatile Organic Compounds (VOC)	75
Operational Emissions (Pounds per Day)	
Respirable Particulate Matter (PM_{10})	100
Fine Particulate Matter ($PM_{2.5}$)	55
Oxides of Nitrogen (NO_X)	250
Oxides of Sulfur (SO_X)	250
Carbon Monoxide (CO)	550
Volatile Organic Compounds (VOC)	55
Health Risks from Toxic Air Contaminant Exposure	**Health Risk Threshold**
Excess Cancer Risk (Chances per Million)	10 in 1 million
Non-Cancer Acute or Chronic Hazard Index	1.0

Source: City Municipal Code Chapter 33, Article 47, § 33-924(a)(5); SDAPCD 2021b

SDAPCD Rule 51 (Nuisance) prohibits emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a "considerable" number of persons or businesses in the area would be considered to be a significant, adverse odor impact.

4.2.4 Methodology and Assumptions

Criteria pollutant and precursor emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod is a computer model used to estimate air emissions resulting from land development projects throughout the state of California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air quality management and pollution control districts. The calculation methodology, source of emission factors used, and default data is described in the CalEEMod User's Guide, Appendices C, D, and G (CAPCOA 2022).

In brief, CalEEMod is a computer model that estimates criteria air pollutant and GHG emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating, ventilation, and cooling; lighting; and plug-in appliances), water use and wastewater generation, and solid waste disposal. Emissions are estimated based on land use information input to the model by the user. Further detail about CalEEMod is provided in Appendix B and default parameters that were changed in the project analysis are described below.

4.2.4.1 Construction Emissions

CalEEMod has the capability to calculate reductions in construction emissions from the effects of dust control, diesel-engine classifications, and other selected emissions reduction measures. In compliance with SDAPCD Rule 50 and Rule 55, fugitive dust emissions calculations assume application of water on exposed surfaces a minimum of two times per day. Based on CalEEMod defaults, the dust control efficiency for material movement from watering two times per day is 61 percent, and the dust control efficiency for demolition from watering two times per day is 36 percent.

Construction Activities

Construction emissions were estimated based on the timeline provided by the project applicant, which assumes construction would commence on the full project site with demolition and site preparation (clearing and grubbing) in August 2026. Church construction was assumed to be completed by March 2028 and residential construction was assumed to be completed by September 2028 for a total construction period of approximately 25 months. The quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction activity is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer time period, emissions could be reduced because of: (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in CalEEMod; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Construction activities would include site preparation, demolition, grading, underground utility installation, building construction, paving, and architectural coatings. Paving and architectural coatings are assumed to occur during the last few months of building construction. The grading, underground utilities, and paving activities would include work within the Felicita Road and Brotherton Road ROWs. Based on estimates from the project engineer, grading would involve 71,260 CY of cut and 24,760 CY of fill on the residential portion of the site and 5,050 CY of cut and 44,400 CY of fill on the church portion of the site. After using cut material as backfill across the project site, the project would result in a net export of 7,150 CY of soil. Additionally, approximately 30 truckloads (600 tons) of debris from the residential development site and 15 truckloads (300 tons) of debris from the church site are anticipated to be hauled during demolition. During site preparation, approximately 10 truckloads (160 CY) of vegetation are anticipated to be hauled from the residential site and approximately 5 truckloads (80 CY) of vegetation are anticipated to be hauled from the church site. The construction schedule assumed in the modeling is shown in Table 4.2-6, *Anticipated Construction Schedule*.

Table 4.2-6
ANTICIPATED CONSTRUCTION SCHEDULE

Construction Activity	Construction Period Start	Construction Period End	Number of Working Days
Residential Construction			
Site Preparation	8/1/2026	8/21/2026	15
Demolition	8/1/2026	9/1/2026	22
Grading	9/2/2026	10/13/2026	30
Underground Utilities	10/15/2026	1/14/2027	66

Construction Activity	Construction Period Start	Construction Period End	Number of Working Days
Building Construction	1/15/2027	9/15/2028	436
Paving	4/19/2028	4/30/2028	8
Architectural Coatings	5/1/2028	7/31/2028	66
Church Construction			
Site Preparation	8/1/2026	8/21/2026	15
Demolition	8/1/2026	8/29/2026	20
Grading	8/20/2026	9/30/2026	30
Underground Utilities	10/1/2026	12/31/2026	66
Building Construction	1/1/2027	12/31/2027	261
Paving	12/22/2027	12/31/2027	8
Architectural Coatings	1/1/2028	3/1/2028	43

Source: HELIX 2026

If construction is delayed or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than incorporated in CalEEMod, and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Construction Off-Road Equipment

Construction would require the use of heavy off-road equipment. Construction equipment estimates were based on site project information provided by the project applicant and default values in CalEEMod. Table 4.2-7, *Construction Equipment Assumptions*, presents a summary of the assumed equipment that would be involved in each stage of construction.

Table 4.2-7
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Equipment	Horsepower	Residential Quantity	Church Quantity	Hours/Day
Site Preparation				
Rubber-Tired Dozers	367	1	1	8
Demolition				
Rubber-Tired Dozers	367	1	1	8
Tractors/Loaders/Backhoes	36	1	1	8
Water Truck	376	1	1	4
Grading				
Rubber-Tired Dozers	367	1	1	8
Graders	148	1	1	8
Scrapers	423	3	3	8
Water Truck	376	1	1	4
Underground Utilities				
Excavators	36	2	2	8
Tractors/Loaders/Backhoes	84	1	1	8
Water Truck	376	1	1	4
Building Construction				
Cranes	367	1	1	7
Generator Sets	14	1	1	8

Equipment	Horsepower	Residential Quantity	Church Quantity	Hours/Day
Forklifts	82	3	3	8
Tractors/Loaders/Backhoes	84	3	3	7
Welders	46	1	1	8
Architectural Coating				
Air Compressors	37	1	1	6
Paving				
Pavers	81	2	2	8
Paving Equipment	89	2	2	8
Rollers	36	2	2	8

Source: HELIX 2026

Construction On-Road Trips

Worker commute trips were modeled based on CalEEMod defaults. Worker commute trips are anticipated to vary between approximately 6 and 217 trips per day, depending on construction activity. Approximately 40 vendor trips per day are anticipated during building construction (36 for residential construction, 4 for church construction), and vendor trips during other construction phases were added based on recommended defaults. Vegetation hauling during site preparation would result in (1) one-way trip per day per site, demolition debris hauling would result in (7) one-way trips per day from residential construction and (4) one-way trips per day from church construction; soil export hauling during grading would result in 30 one-way trips per day. Paving would require the import of asphalt and concrete estimated to include 42 one-way trips per day (166 loads) during residential development paving and 19 one-way trips per day (77 loads) during church development paving. The CalEEMod default worker, vendor and haul trip distances for San Diego County were used in the model. All haul trips during site preparation, demolition, and grading assume approximately 500 feet of travel on unpaved on-site access roads.

Construction Architectural Coatings

Architectural coatings applied during construction were assumed to be building interior and exterior building coatings and pavement marking. Per CalEEMod defaults for San Diego County all interior and exterior building coatings would have a maximum VOC content of 50 g/L and pavement marking would have a maximum VOC content of 100 g/L. These VOC content assumptions are consistent with the SDAPCD Rule 67.0.1 VOC limits.

4.2.4.2 Operation Emissions

Operational emissions were estimated using CalEEMod. Operational sources of criteria pollutant emissions include mobile (on-road vehicles), area, and energy.

Vehicular (Mobile) Sources

Operational emissions from mobile source emissions are associated with project-related vehicle trip generation and trip length. Since the size of the proposed new church building (24, 627 SF) would essentially be the same size as the existing church building (24,395 SF), only the residential development would generate a net increase in mobile source emissions; therefore, only the residential development mobile trips were considered in the modeling. Based on the trip generation rate from the Local Mobility

Analysis (LMA) prepared for the project (Linscott, Law & Greenspan [LLG] 2025; Appendix J), the residential development would generate 1,548 ADT. The LMA also included a project VMT analysis. With implementation of mitigation measure TRA-1 (refer to Section 4.11, *Transportation*), the LMA concluded that the residential development would result in a VMT of 13,247 miles per day (LLG 2025). Accordingly, the modeled trip distances were set to 8.6 miles per trip (13,247 miles divided by 1,548 trips).

Area Sources

Area sources include emissions from landscaping equipment, the use of consumer products, the reapplication of architectural coatings for maintenance, and hearths. The project would not include any natural gas fireplaces, wood fireplaces, or wood stoves. Accordingly, the number of hearths was set to zero in CalEEMod. Emissions associated with other area sources were estimated using the CalEEMod default values.

Energy Sources

Development within the project would use electricity for lighting, heating, and cooling. Direct emissions from the burning of natural gas typically results from furnaces and hot water heaters. Energy source emissions were estimated using CalEEMod defaults which assume implementation of energy-reducing compliance with the 2019 Title 24 standards. Default energy use assumptions for the project were used in the model.

4.2.4.3 Health Risk Assessment

Potential health risks to future project residents from roadway DPM emissions were analyzed in accordance with applicable portions of the OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2015), and applicable portions of the SDAPCD's *Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments* (SDAPCD 2022). Dispersion modeling based on the calculated localized concentrations of TACs was conducted using Lakes AERMOD View version 11.2.0. The Lakes program utilizes the USEPA's AERMOD gaussian air dispersion model version 21112. The health risk assessment (HRA) methodology is described briefly here; additional details can be found in Appendix B of this EIR.

Calculations of DPM emissions were based on traffic volumes described in the project LMA for the Near-Term (year 2025) + Project scenario (LLG 2025) and on SANDAG projected traffic volumes for I-15 in the project vicinity for 2025 (SANDAG 2023). Emissions of DPM from trucks were calculated using emission factors from CARB's EMFAC2021 version 1.0.2 online database (CARB 2023). Traffic on roadway segments were modeled as line volume sources following the methodology/calculations recommended by the USEPA, using an average truck height of 13.5 feet, and average car and light truck height of 6 feet, and average roadway width estimated using aerial images (USEPA 2011). The DPM emissions were modeled as variable emissions by hour-of-day with each hour set as a percentage of average daily emissions based on studies of hourly traffic volume distribution typical of San Diego freeways (Wyle Laboratories 1973; Ogden International 1986).

Meteorological data from a station in Escondido from the years 2010 to 2012 was used and rural dispersion coefficients were selected in the model. United States Geological Survey National Elevation Dataset files with a 30-meter resolution covering an area approximately one kilometer around the project site were imported to the model using AERMAP. To develop risk isopleths, receptors were placed in a cartesian grid 1,450 meters by 1,450 meters (approximately 0.9 mile by 0.9 mile), centered on the project

site with a grid spacing of 50 meters (66 feet) and a receptor height of 1.52 meters (5 feet) above the ground. Additional receptors were placed at the project apartment outdoor spaces for each building floor facing I-15, Felicita Road, and West Citracado Parkway.

Adverse health effects resulting from localized concentrations of TACs were calculated using CARB's Hotspots Analysis and Reporting Program, Air Dispersion Modeling and Risk Tool version 22118. For the residential cancer risk, an exposure duration of 30 years was selected in accordance with the OEHHA guidelines (OEHHA 2015). The model conservatively assumes that residents would be standing and breathing outdoors at the patio, balcony, or open window every day between 17 and 21 hours per day (depending on the age group, starting with infants in utero in the third trimester of pregnancy) for 30 years. Because there is a school near the project site (Miller Elementary School), fraction of time at home adjustments were not applied to age bins for 2 to 16 years old. Tier 1 of time at home adjustments were used for other age bin: 0.85 for less than 2 years old and 0.73 for 16 years and older. The OEHHA derived intake rate percentile method was selected for residential cancer and non-cancer chronic scenarios.

4.2.5 Project Impact Analysis

4.2.5.1 Air Quality Plans

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Discussion

The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for ozone. In addition, the SDAPCD's Attainment Plan includes the SDAPCD's plans and control measures for attaining the ozone NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the RAQS, Attainment Plan, and SIP.

The RAQS and Attainment Plan rely on information from CARB and SANDAG, including projected growth in the County, mobile, area and all other source emissions in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by individual cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS and Attainment Plan. In the event that a project proposes development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS and Attainment Plan. If a project proposes development that is greater than that anticipated in the City General Plan and SANDAG's growth projections upon which the Attainment Plan is based, the project may be in conflict with the RAQS, Attainment Plan, and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the RAQS and Attainment Plan for the specific subregional area.

The project would require a General Plan Amendment to change the existing General Plan Land Use designation from Planned Office (PO) to Urban (V). Therefore, an analysis was conducted to determine if

the project would result in higher ozone precursor emissions levels compared to development allowed under the existing General Plan land use designation.

The proposed density for the residential development is 32.6 dwelling units per acre and the proposed FAR of the project, including existing and proposed components of the church building, would be approximately 0.63. The existing general plan land use designation of PO for the project site has a maximum FAR of 2.0 (City 2012a). For the approximately 14.83-acre development area, the maximum buildout under the current General Plan designation would be an office development consisting of approximately 1,291,995 SF of floor space. Using CalEEMod default settings, the resulting maximum daily emissions of ozone precursors for the operations of the office development would be 54.8 pounds per day of VOC and 22.1 pounds per day of NO_X. As discussed in Section 4.2.5.2, below, the maximum daily ozone precursor emissions for the proposed project would be 15.4 pounds per day of VOC and 4.8 pounds per day of NO_X, which are well below the maximum buildout ozone precursor emissions for a land use designation of PO. In addition, the project's 258 dwelling units would generate a population increase of approximately 828 individuals, which is only 3.5 percent of SANDAG's projected population growth for the City between 2020 and 2050 (SANDAG 2021). The church development site would not include any permanent residences and would not generate a population increase. Therefore, the project ozone precursor emissions and population growth would not exceed emissions from the maximum growth anticipated in the General Plan and assumed in development of the RAQS and Attainment Plan. Therefore, the proposed project would not conflict with or obstruct implementation of the RAQS and Attainment Plan.

Level of Significance Prior to Mitigation

Implementation of the project would not conflict with or obstruct implementation of the applicable air quality plan and impacts would be less than significant.

Mitigation Measures

No significant air quality impacts related to air quality plans would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to conflicts with the applicable air quality plan would remain less than significant.

4.2.5.2 Air Quality Standards

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact Discussion

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SDAB. The region is a federal and/or state nonattainment area for ozone, PM_{10} and $PM_{2.5}$. The project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. To determine whether the project would result in a cumulatively considerable net increase in criteria pollutants that

would violate an air quality standard or contribute substantially to an existing or projected air quality violation, the project's emissions are compared with the quantitative screening thresholds provided in Table 4.2-5. The project's construction emissions were estimated using CalEEMod as described in Section 4.2.4.

Construction Emissions

The results of the emissions calculations for project construction are shown in Table 4.2-8, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the applicable screening thresholds. The calculations assume conformance with SDAPCD Rules 50, 55, and 67.0.1, specifically watering all exposed areas twice per day, limiting vehicle speeds on unpaved on-site roads to 25 mph, and limiting the VOC content of architectural coatings to 50 g/L for building coatings and 100 g/L for parking lot marking. As shown in Table 4.2-8, the project's short-term construction-related criteria pollutant and precursor emissions would be below the screening thresholds.

Table 4.2-8
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Activity/Year/Season	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Site Preparation (Church), Demolition (Church), Site Preparation (Residential), Demolition (Residential)/2026/Summer	4.4	39.2	36.3	0.1	15.4	5.1
Site Preparation (Church), Demolition (Church), Grading (Church), Site Preparation (Residential), Demolition (Residential)/2026/Summer	8.0	70.3	65.7	0.2	20.9	7.8
Demolition (Church), Grading (Church), Demolition (Residential)/2026/Summer	6.2	53.4	51.3	0.1	13.8	4.3
Demolition (Church), Grading (Residential)/2026/Summer	4.9	42.4	40.4	0.1	7.4	3.3
Grading (Church), Grading (Residential)/2026/Summer	7.3	64.9	59.8	0.2	15.8	6.0
Utility Undergrounding (Church), Grading (Residential)/2026/Winter	4.2	37.9	36.1	0.1	10.6	3.4
Utility Undergrounding (Church), Utility Undergrounding (Residential)/2026/Winter	1.1	8.4	13.4	0.0	0.4	0.3
Building Construction (Church), Utility Undergrounding (Residential)/2027/Winter	1.6	13.8	20.9	0.0	0.7	0.5
Building Construction (Church), Building Construction (Residential)/2027/Winter	2.8	20.8	34.3	0.1	2.8	1.1
Building Construction (Church), Building Construction (Residential)/2027/Summer	2.9	20.6	35.5	0.1	2.8	1.1
Building Construction (Church), Paving (Church), Building Construction (Residential)/2027/Winter	4.2	29.5	45.5	0.1	3.6	1.6
Architectural Coatings (Church), Building Construction (Residential)/2028/Winter	4.7	11.4	21.7	0.0	2.3	0.8
Building Construction (Residential)/2028/Winter	1.7	10.6	20.5	0.0	2.3	0.8
Building Construction (Residential)/2028/Summer	1.7	10.5	21.5	0.0	2.3	0.8
Building Construction (Residential), Paving (Residential)/2028/Summer	3.6	20.6	33.4	0.1	3.5	1.3

Activity/Year/Season	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Building Construction (Residential), Architectural Coating (Residential)/2028/Summer	33.2	11.4	24.2	0.0	2.7	0.9
Maximum Daily Emissions	**33.2**	**70.3**	**65.7**	**0.2**	**20.9**	**7.8**
Screening Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Operation Emissions

The results of the emissions calculations for project operation are shown in Table 4.2-9, *Maximum Daily Operational Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the applicable screening thresholds. The calculations assume conformance with SDAPCD Rule 67.0.1 limiting the VOC content of architectural coatings during reapplication. As noted, the church development would replace an existing church building with a new church building that is essentially the same size and thus, no new mobile source emissions would occur. Existing area and energy emissions were not considered in this calculation of the project's net increase in emissions; therefore, this provides a conservative analysis of the resulting net increase in emissions. As shown in Table 4.2-9, the project's long-term operational emissions of criteria pollutants and precursors would not exceed the applicable screening thresholds.

Table 4.2-9
OPERATIONAL EMISSIONS

Source	Pollutant Emissions (pounds per day)[2]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area (Church)	0.8	--	1.2	<0.1	<0.1	<0.1
Energy (Church)	<0.1	0.3	0.2	<0.1	<.01	<.01
Mobile (Residential)	5.5	3.9	39.9	0.1	9.5	2.5
Area (Residential)	9.2	--	17.0	<0.1	<0.1	<0.1
Energy (Residential)	<0.1	0.6	0.3	<0.1	<0.1	<0.1
Total Daily Emissions[1]	**15.4**	**4.8**	**58.6**	**0.1**	**9.6**	**2.5**
Screening Threshold	*55*	*250*	*550*	*250*	*100*	*55*
Exceed Screening Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

Source: HELIX 2026

[1] Totals may not sum due to rounding.

[2] Maximum daily emissions of VOC and CO occur during summer, maximum daily emission of NO_X occur during winter, emissions of SO_X, PM_{10} and $PM_{2.5}$ are not seasonally dependent.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Level of Significance Prior to Mitigation

Short-term construction and long-term operation of the project would not result in criteria pollutant and precursor pollutant emissions that would exceed the City Environmental Quality Regulation screening thresholds, and the impacts would be less than significant.

Mitigation Measures

No significant air quality impacts related to air quality standards would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to air quality standards would remain less than significant.

4.2.5.3 Sensitive Receptors

Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact Discussion

Construction Activities

Implementation of the project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the TAC DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the construction activity (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive activities such as site preparation/grading, construction-related emissions would be higher than other less equipment-intensive activities such as building construction.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer HRAs are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). In addition, concentrations of mobile-source DPM emissions disperse rapidly and are typically reduced by 70 percent at approximately 500 feet (CARB 2005). The most intense use of heavy, off-road diesel construction equipment would occur during grading, which is anticipated to occur over only 39 workdays. Considering the short duration of intensive off-road, diesel equipment used on the project site, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations throughout the project site (not concentrated near any single receptor for extended periods), it is not anticipated that construction of the project would expose sensitive receptors to substantial DPM.

Operational Activities

The project is not anticipated to generate substantial pollutant concentrations on the site during operation but would contribute vehicles to the region that have the potential to contribute to CO hotspots. Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increases. Project-generated traffic has the potential of contributing to localized "hot spots" of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections.

The SDAPCD does not have screening criteria for when an intersection or road segment might generate CO hotspots. However, the volume of vehicles required to result in a CO hotspot is very high. For example, the Bay Area Air Quality Management District's (BAAQMD's) screening criteria for CO hotspots is intersections with more than 44,000 vehicles per hour, or intersections with 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway; BAAQMD 2023). San Diego County and the Bay Area share similar urban characteristics, including high traffic volumes, freeway-dominated transportation networks, and comparable vehicle emission profiles; as a result, the BAAQMD's threshold is used to assess the potential for CO hotspots in the project vicinity in the absence of a local standard. According to the intersection volumes reported in the LMA, the highest project-affected traffic volumes would be at the intersection of West Citracado Parkway and Centre City Parkway, which would have a peak hour traffic volume of 3,509 vehicles for the near-term (2025) scenario, including project traffic and cumulative project traffic. This peak hourly traffic volume would be far below the BAAQMD's CO hotspot screening threshold of 44,000 vehicles per hour, or 24,000 vehicles per hour with limited vertical mixing. Therefore, the project would not result in substantial local concentrations of CO.

New Sensitive Receptors

As a residential development, the project would be considered a new sensitive land use and future project residents would be new sensitive receptors. The CARB siting recommendations suggest avoiding siting new sensitive receptors within: 1,000 feet of a warehouse distribution center, 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet of a typical gas dispensing facilities, 300 feet of a dry cleaning facility that uses perchloroethylene, or 500 feet of a freeway or urban road with 100,000 or more vehicles per day (CARB 2005). The closest gas station to the project is located approximately 3,100 feet (0.59 mile) to the east and the closest dry-cleaning facility to the project site is approximately 2,650 feet (0.50 mile) to the northeast. There are no warehouse distribution centers within one mile of the project site.

The closest road with 100,000 or more vehicles per day is I-15, with the nearest travel lane centerline approximately 160 feet southwest of the project site. The primary TAC of concern from on-road vehicle exhaust in California is DPM. As discussed in Section 3.6, project residences would include a mechanical ventilation system that meets the criteria of the International Building Code (Section 1203.2 of the California Building Code) with filters having a Minimum Efficiency Reporting Value (MERV) rating of 13 or higher. A MERV-13 filter removes between 75 and 90 percent of pollutant particles 0.3 micron in diameter and larger (CARB 2020). As such, future project residents would not be exposed to substantial concentrations of pollutants from nearby high-volume roadways.

Level of Significance Prior to Mitigation

Implementation of the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Mitigation Measures

No significant air quality impacts related to sensitive receptors would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to exposure of sensitive receptors to substantial pollutant concentrations would remain less than significant.

4.2.5.4 Other Emissions (Such as Odors)

Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Discussion

H&SC Sections 41700 and 41705, and SDAPCD Rule 51, prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Any unreasonable odor discernible at the property line of the project site would be considered a significant odor impact.

According to the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The project, involving multi-family residential and church uses, would not include any of these uses nor are there any of these land uses in the project vicinity.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. Construction equipment would move around the site and would not produce odors in any one location for an extended period of time. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short term construction-related odors are expected to cease upon the drying or hardening of the odor producing materials. Long-term operation of the project would not be a substantial source of objectionable odors.

Level of Significance Prior to Mitigation

Implementation of the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Mitigation Measures

No significant air quality impact related to odors would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to odors would remain less than significant.

This page intentionally left blank

4.3 Biological Resources

This section provides an overview of the existing conditions and regulatory framework related to biological resources as well as an analysis of potential biological resources impacts resulting from implementation of the proposed project. The following primarily relies on the assessment of biological resources presented in the Biological Resources Letter Report (Michael Baker International 2023) prepared for the residential site and the Biological Resources Assessment (MNS Engineers 2024) prepared for the church site. These reports are included as Appendices C and D to the EIR.

4.3.1 Existing Conditions

The project site consist of two parcels, the parcel to the east is developed with a church building, two private education buildings, and surface parking on an elevated building pad, the western end of the adjacent parcel contains a drainage swale, dirt/vegetated fields, and utility infrastructure. The surrounding area is developed with residential uses to the north, south, east, and west; a nursing home to the north; Miller Elementary School to the north; and a small orchard and agriculture uses to the southeast.

4.3.1.1 Vegetation and Land Cover

The biological survey area (BSA) evaluated in the biological resources letter report for the residential site consists of an approximately eight-acre area that includes the residential site and a surrounding 100-foot buffer. The residential site BSA supports urban/developed, disturbed, non-native grassland, emergent wetland, and ornamental vegetation communities and land cover types. The BSA for the church site consists of the approximately seven-acre church site and a surrounding 100-foot buffer. The church site BSA supports non-native grassland, ornamental, and urban/developed vegetation communities and land cover types. Descriptions of these vegetation and land cover types are provided below and further noted by Table 4.3-1, *Vegetation and Land Cover Types Within the BSAs*, which identifies the extent of each vegetation community and land cover type within the residential and church BSAs. Figure 4.3-1, *Vegetation Map – Alexan Escondido*, shows the existing vegetation communities and land cover types within the residential site BSA, and Figure 4.3-2, Vegetation Map – Bethel Baptist Church, shows the existing vegetation communities and land cover types within the church site BSA.

Emergent Wetland

Emergent wetland constitutes low-growing, perennial wetland species supported by flow runoff from the surrounding developed areas. Species found here included curly dock (*Rumex crispus*), Bermuda grass (*Cynodon dactylon*), dallisgrass (*Paspalum dilatatum*), barnyard grass (*Echinochloa crus-galli*), smartweed sp. (Persicaria sp.), common knotgrass (*Polygonum aviculare*), false nutsedge (*Cyperus strigosus*), and an unidentified non-native grass. Emergent wetland occurs within the drainage channel that traverses the western portion of the residential BSA in a north-south alignment.

Non-native Grassland

Non-native grassland areas constitute a dense to sparse cover of annual grasses with flowering culms. This is often associated with numerous species of showy-flowered, native forbs. Non-native grassland occurs in the western and southern portions of the residential BSA and the eastern and southern portions of the church BSA where the grass fields are present.

Ornamental Vegetation

Ornamental vegetation are areas vegetated with landscaping. Ornamental vegetation occurs within the southeastern portion of the residential BSA and in the northwestern portion of the church BSA adjacent to Brotherton Road.

Disturbed/Ground Cover

Disturbed/ground cover are areas mapped as disturbed habitat, which have been physically disturbed and are no longer recognizable as a native or naturalized vegetation but continue to retain a soil substrate. This land cover type is located just west of the existing parking lot in the central portion of the residential BSA.

Urban/Developed

Urban/developed is not a vegetation classification but a land cover type. Areas mapped as developed have been constructed upon or physically altered to an extent that only landscape vegetation can be supported. This land cover type includes the developed portion of the site where the church, school buildings, and parking areas are present in the eastern portion of the residential BSA and the western portion of the church BSA.

Table 4.3-1
VEGETATION AND LAND COVER TYPES WITHIN THE BSAs

Vegetation/Land Cover Type[1]	Residential BSA[2] (acres)	Church BSA[3] (acres)	Total (acres)
Emergent Wetland	0.31	--	0.31
Non-native Grassland	3.35	3.83	7.18
Disturbed/Groundcover	0.16	--	0.16
Ornamental	0.04	0.33	0.37
Urban/Developed	4.21	2.52	6.73
Total	**8.07**	**6.68**	**14.75**

1 Vegetation and land use classifications based on Draft Vegetation Communities of San Diego County by Oberbauer, Kelly, and Buegge (2008).
2 Source: Michael Baker International 2023
3 Source: MNS Engineers 2024

4.3.1.2 Observed Plant and Wildlife Species

Plant Species

A total of 25 plant species were observed within the residential BSA and 45 within the church BSA during the biological surveys, none of which are considered special-status species. Most include grasses such as windmill grass (*Chloris verticillate*) and others are considered invasive species, including Bermuda grass (*Cynodon dactylon*), shortpod mustard (*Hirschfeldia incana*), curly dock (*Rumex crispus*), Russian thistle (*Salsola* sp.), puncture vine (*Tribulus sp.*), and Mexican fan palm (*Washingtonia robusta*). A complete list of observed plant species in the residential BSA is contained in Attachment C of the Biological Resources Letter Report (Michael Baker International 2023), which is included as Appendix C of this EIR. A complete



Legend

Project Site

Study Area - 100 foot Buffer

Reference Point

Palm Tree

Vegetation/Other Land Uses

Non-native Grassland

Emergent Wetlands

Ornamental

Developed

Waters\Wetlands

Disturbed

0 100 200 Feet

Source: Michael Baker International 2022

I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.3-1_Vegetation_Alexan.indd 00876.00006.001 07/18/23 -RK

HELIX Environmental Planning

Vegetation Map – Alexan Escondido

Figure 4.3-1



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.3-2_Vegetation_Church.indd 00876.00006.001 12/05/24 -RK

Source: MNS 2024

HELIX Environmental Planning

Vegetation Map – Bethel Baptist Church

Figure 4.3-2

list of observed plant species in the church BSA is contained in Attachment C of the Biological Resources Assessment (MNS Engineers 2024), which is included as Appendix D of this EIR.

Animal Species

Seven bird species were detected within the residential BSA during the biological survey, including American crow (*Corvus brachyrhynchos*), red-tailed hawk (*Buteo jamaicensis*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), and mourning dove (*Zenaida macroura*). A total of two mammals were detected within the residential BSA during the field survey, including domestic dog (*Canis lupus familiaris*) and gopher (*Geomys* sp.).

Within the church BSA, eight bird species were observed, including the common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), song sparrow (*Melospiza melodia*), hooded oriole (*Icterus cucullatus*), house finch, northern mockingbird (*Mimus polyglottos*), brown-headed cowbird (*Molothrus ater*), and lesser goldfinch (*Spinus psaltria*). A total of two mammal species were observed within the church BSA, including domestic dog and gopher.

None of the observed wildlife species are considered special-status species. The observed bird species are common in an urban setting. The BSAs provide marginal habitat for a limited number of mammalian species adapted to living in edge or urban environments.

4.3.1.3 Special-Status Species

No special-status plant or wildlife species were detected during the biological surveys. Special-status plant and wildlife species with potential to occur at the project site were assessed based on review of prior recordings in the project vicinity and field surveys of the BSAs. The CDFW California Natural Diversity Data Base (CNDDB), California Native Plant Society Inventory of Rare and Endangered Plants of California, and USFWS Information for Planning and Consultation (IPaC) was queried for reported locations of special-status plant and wildlife species as well as sensitive natural communities in the U.S. Geological Survey (USGS) Escondido, California 7.5-minute and surrounding quadrangles.

According to these databases, a total of 114 special-status plant species and 69 special-status wildlife species have been recorded in the USGS Escondido, California 7.5-minute and the surrounding quadrangles. Based on the results of the field surveys and a review of specific habitat preferences, distributions, elevation ranges, site disturbances, and the existing urban environment, it was determined that no special-status plant species are expected to occur within the project site and three special-status wildlife species would have low potential to occur at the site. The special-status wildlife species that have low potential to occur at the site include burrowing owl (*Athene cunicularia*), a state species of special concern; Swainson's hawk (*Buteo swainsoni*), a state threatened species; and western mastiff bat (*Eumops perotis californicus*), a County-designated sensitive species. The habitat for burrowing owl and Swainson's hawk at the project site is limited to non-native grasslands providing foraging habitat for these species, no nesting habitat is available on the project site. Western mastiff bat is also anticipated to primarily have potential to use the project site for foraging but there are a small number of palm trees (nine) that could be used for bat roosting. A complete list of special-status plant and wildlife species with potential to occur at the residential site is contained in Attachment D of the Biological Resources Letter Report (Michael Baker International 2023), which is included as Appendix C of this EIR. A complete list of special-status plant and wildlife species with potential to occur at the church site is contained in

Attachment D of the Biological Resources Assessment (MNS Engineers 2024), which is included as Appendix D of this EIR.

4.3.1.4 Aquatic Resources

An aquatic resources delineation was conducted within the residential site and the church site. The aquatic resources delineations were conducted using the most recent agency-approved methodology to identify and map the extent of state and federal jurisdictional features (i.e., wetland and non-wetland waters of the U.S., waters of the State, streambed, riparian vegetation) located within the boundaries of the project site.

One potentially jurisdictional wetland feature was observed within the residential BSA, generally extending from Brotherton Road southwest across the residential site parallel to Felicita Road at approximately 150 feet east of Felicita Road. The feature consists of a 0.31-acre stormwater swale with a defined bed and bank only in the direct area of the outlet structure, near the headwall adjacent to Brotherton Road. The remainder of the feature is within a relatively flat area, with a subtle four-foot downslope gradient over approximately 600 feet in length. In the flat area, the lateral boundary of the feature was variable and primarily determined using rack and debris indicators or a change in vegetation cover. On the east side of the feature, changes in slope were used to define a potential jurisdictional limit. The feature receives water from local overland flow (on-site), and stormwater flow from residential properties and nearby roads, including Brotherton Road and Felicita Road. The drainage is considered potential USACE federal waters of the U.S. and CDFW and RWQCB waters of the State.

No potentially jurisdictional features were identified within the church BSA. No streambeds, drainage swales, wetlands, or riparian vegetation was observed within the church BSA and no evidence of previous or historic drainage features or streambeds are mapped on USGS topographic maps (Escondido quadrangle).

4.3.2 Regulatory Framework

4.3.2.1 Federal Regulations

Federal Endangered Species Act

Administered by the U.S. Fish and Wildlife Service (USFWS), the Federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA. FESA Section 9(a) defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS designates critical habitat for endangered and threatened species. The goal is to restore healthy populations of listed species within their native habitats, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in the destruction or adverse modification of the critical habitat. No critical habitat designated by the USFWS for federally listed endangered species is mapped within or adjacent to the project site.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. Section 10(a) generally describes a process for the preparation of a Habitat Conservation Plan and issuance of an incidental take permit.

Migratory Bird Treaty Act

Migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (Federal Register Doc. 05-5127). The MBTA is generally protective of migratory birds. In common practice, the MBTA is now used to place restrictions on the disturbance of active bird nests during the nesting season. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

The USACE regulates impacts to waters of the United States under Section 404 of the Clean Water Act (CWA) (33 U.S.C. 401 et seq.; 33 U.S.C. 1344; U.S.C. 1413; and Department of Defense, Department of the Army, Corps of Engineers 33 CFR Part 323). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the United States. A federal CWA Section 404 Permit would be required for a project to place fill in waters of the United States. Projects impacting waters of the United States could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions.

A CWA Section 401 Water Quality Certification administered by the RWQCB must be issued prior to issuance of a Section 404 Permit. The RWQCB reviews projects for consistency with the achievement of water quality objectives and the reasonable protection of beneficial uses designated in the applicable Water Quality Control Plan. Collectively, wetland and water resources regulated by the State Water Resources Control Board (SWRCB) and RWQCB are referred to as waters of the State, and these resources may or may not include waters of the United States.

4.3.2.2 State Regulations

California Endangered Species Act

Similar to the FESA, the California Endangered Species Act (CESA) of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code [CFG Code] Section 2050 et seq.). The CESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

The CESA established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may “take” plant or wildlife species listed as endangered or threatened

under the FESA and CESA, pursuant to a federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with the CESA (CFG Code Section 2080.1[a]). For state-only listed species, CFG Code Section 2081 authorizes the CDFW to issue an Incidental Take Permit for State listed threatened and endangered species if specific criteria are met.

California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. CFG Code Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

Under CFG Code Sections 1600 et. seq., CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife and requires a Streambed Alteration Agreement for such activities. The CDFW issues a Streambed Alteration Agreement with any necessary mitigation to ensure protection of the State's fish and wildlife resources. The CDFW has jurisdiction over riparian habitats associated with watercourses.

CFG Code Section 2800 et. seq., known as the Natural Community Conservation Planning Act, is intended to conserve, protect, restore, and enhance natural communities. It promotes the protection of natural communities at the ecosystem scale while accommodating compatible land uses. CDFW is the principal state agency implementing the Natural Community Conservation Planning program. Natural Community Conservation Plans developed in accordance with this program provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth.

4.3.2.3 Local Regulations

North County Multiple Habitat Conservation Program

The MHCP is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in northwestern San Diego County in accordance with the Natural Community Conservation Planning Act. The program area encompasses the cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. Its goal is to conserve approximately 19,000 acres of habitat for the protection of more than 80 rare, threatened, or endangered species. When completed, the habitat preservation areas are intended to serve as a key component of the San Diego region's smart growth efforts by preserving habitat and open space and by directing forecasted growth into appropriate areas.

The MHCP Subregional Plan and associated Environmental Impact Statement/EIR were adopted and certified by the SANDAG Board of Directors on March 28, 2003. Each city within the MHCP plan area must subsequently adopt subarea plans and implement agreements with CDFW and USFWS for incidental take

of covered species. The draft Escondido MHCP Subarea Plan has not been approved by the City. At full implementation, the draft Escondido MHCP Subarea Plan would conserve a total of 6,570 acres of natural habitats within the proposed preserve area. As the draft Escondido MHCP Subarea Plan has not been approved, no federal or state authorization for incidental take of sensitive species is provided under the MHCP for projects in the City; however, the draft Escondido MHCP Subarea Plan provides a guide to sensitive biological resources in the City and a vision for habitat preservation. The project site is mapped as developed land and located outside of areas targeted for conservation in the MHCP and draft Escondido MHCP (City 2001; SANDAG 2003).

City of Escondido General Plan

The City's General Plan Resource Conservation Element (City 2012a) includes goals and policies regarding biological resources. Applicable General Plan goals and policies regarding biological resources include the following:

- **Biological and Open Space Resources Goal 1**: Preservation and enhancement of Escondido's open spaces and significant biological resources as components of a sustainable community.

- **Biological and Open Space Resources Policy 1.6**: Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened, or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, mitigation of resources either on- or off-site at ratios consistent with State and federal regulations, and in coordination with those agencies having jurisdiction over such resources.

- **Biological and Open Space Resources Policy 1.7**: Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.

- **Biological and Open Space Resources Policy 1.8**: Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.

- **Biological and Open Space Resources Policy 1.9**: Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.

- **Biological and Open Space Resources Policy 1.10**: Prohibit any activities in riparian areas other than those permitted by appropriate agencies to protect those resources.

- **Biological and Open Space Resources Policy 1.11**: Construct appropriate barriers to be maintained by property owners or homeowners' associations that restrict access to areas containing sensitive biological resources.

- **Biological and Open Space Resources Policy 1.12**: Promote the use of native plants for public and private landscaping purposes within the city.

City of Escondido Municipal Code – Tree Protection

The City establishes regulations and standards for the preservation, protection, and selected removal of mature and protected trees in Municipal Code Sections 33-1068 and 33-1069. The City requires a permit be obtained for the removal of vegetation when the following are proposed: the replacement or removal trees within the public right-of-way; encroachment into the dripline of protected trees; clearing, pruning, or destroying sensitive biological species, sensitive biological habitat, protected trees and/or required landscaping; or prior to any encroachments that disturb the root system within the dripline of mature trees on lots over two acres in size. Section 33-1068(b) provides exceptions to these permit requirements for projects subject to other discretionary approvals, brush management activities, and other circumstances. In accordance with Section 33-1069 of the City's Municipal Code, the preferred treatment for vegetation is protection in place. However, when vegetation or trees cannot be protected in place, they shall be replaced with equivalent plant material at a 1:1 ratio unless a protected tree is removed, in which case it shall be replaced at a 2:1 ratio.

In accordance with Escondido Municipal Code Section 33-1052, a protected tree is any oak (*genus Quercus*) which has a 10-inch or greater diameter at breast height, or any other species or individual specimen listed on the local historic register or determined to substantially contribute to the historic character of a property or structure listed on the local historic register. A mature tree is defined as any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree, shall have a diameter four inches or greater when measured at 4.5 feet above the tree's natural grade. All other mature trees shall have a diameter at breast height of eight inches, or greater, for a single stem or one of the multiple stems.

4.3.3 Thresholds of Significance

Thresholds used to evaluate potential biological resources impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant biological resources impact could occur if implementation of the proposed project would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;

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

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

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

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

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

4.3.4 Methodology and Assumptions

The information related to existing conditions on the site was based on desktop background research and field surveys. Background research included a review of standard resources such as the California Natural Diversity Database, California Native Plant Society Inventory of Rare and Endangered Plants of California, USFWS Critical Habitat Portal and Information for Planning and Consultation Trust Resource List, USFWS National Wetland Inventory, San Diego Geographic Information Source, and CDFW/USFWS lists of special-status plants and wildlife. Field surveys were conducted on December 1, 2022, January 17 and September 22, 2023 for the residential site, and on June 15, 2024 for the church site. All plant and wildlife species detected, as well as dominant plant species within each vegetation community, were recorded.

Potentially jurisdictional aquatic resources were delineated using the most recent agency-approved methodology to identify and map the extent of state and federal jurisdictional features located within the boundaries of the BSAs. While in the field, jurisdictional features were recorded on aerial photographs and data points were recorded to identify specific widths and length of jurisdictional features and the location of any ordinary high-water mark indicators, photograph points, soil pits and other pertinent site characteristics. Additional information regarding the methodology for desktop background research and field surveys, including jurisdictional resource delineation, is provided in the Biological Resources Letter Report and Biological Resources Assessment provided as Appendices C and D to the EIR.

4.3.5 Project Impact Analysis

4.3.5.1 Special-Status Species

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Impact Discussion

As described in Section 4.3.1.2, the project site is not anticipated to support special-status plant species and has low potential to support burrowing owl and Swainson's hawk foraging as well as bat foraging and limited roosting. Since no nesting habitat for burrowing owl or Swainson's hawk occurs within the project site, construction of the project would not result in direct adverse effects to individuals of these species and would not result in the removal of nesting habitat. The removal of non-native grassland from the project site that has the potential to provide foraging habitat for burrowing owl or Swainson's hawk would represent a marginal decrease in foraging habitat for these species within the project vicinity and would not result in substantial adverse effects to these special-status species.

Western mastiff bats were considered to have low potential to occur at the project site based on the small area of emergent wetland habitat that may provide foraging habitat and Mexican fan palms adjacent to the parking lot and southern boundary of the project site that may provide limited roost sites for roosting.

However, due to the general design of the existing buildings on-site, lack of preferred roosting opportunities (e.g., hollow tree trunks/limbs, tree foliage, caves, bridges, buildings), and the lack of naturally occurring vegetation within the BSAs, bats are generally not expected to occur at the project site. Therefore, development of the project would not result in substantial adverse effects to western mastiff bat individuals or habitat.

Although none of the bird species observed during site surveys were special-status species and no nests were observed, the presence of ornamental trees and shrubs as well as grasslands on the project site provides potential foraging and nesting habitat for migratory bird species and raptors protected pursuant to the MBTA and CFG Code. The removal or trimming of trees and vegetation within the project site has the potential to disrupt nesting sites and result in substantial adverse effects to protected nesting birds and raptors.

Level of Significance Prior to Mitigation

Implementation of the project would not result in substantial adverse effects on special-status plant or wildlife species and impacts would be less than significant. The project does have potential to adversely affect protected nesting birds and raptors and impacts to these nesting birds and raptors would be potentially significant.

Mitigation Measures

BIO-1 Avoidance of Nesting Birds. Prior to the issuance of grading or demolition permits, the City of Escondido shall verify that the following measure is shown on the grading and demolition plans:

If trimming, grubbing, or vegetation clearing occurs within the nesting season (January 15 to August 31), nesting bird surveys for migratory birds and raptors shall be performed for the proposed impact area and a 300-foot buffer, where accessible, by a qualified biologist no more than 72 hours before the start of vegetation removal.

If active nests are found, no-work buffers of no less than 50 feet and no more than 300 feet (for raptor species) shall be established around active nests identified within and adjacent to the project site. The qualified biologist shall determine the appropriate buffer size and level of nest monitoring necessary based on agency protocols or the species' life history, the species' sensitivity to disturbances, individual behavior, status of nest, location of nest and site conditions, presence of screening vegetation, anticipated project construction activities, ambient noise levels compared to project-related noise levels, existing non- project-related disturbances in vicinity, and existing levels of human activity.

The no-work buffer shall be flagged and mapped on the construction plans and maintained until the nesting cycle is determined by the qualified biologist to be complete. Construction shall be allowed to continue outside of the no-work buffers. Periodic monitoring, at intervals determined to be necessary by the qualified biologist, of active nests shall occur to ensure the Project does not result in the failure of the nest. At the discretion of the qualified biologist, additional minimization measures may be implemented if a nesting bird appears to be stressed as a result of project activities and the no-work buffer does not appear to provide adequate protection. Buffer sizes may also be reduced, or the extent of nest monitoring may be reduced, at the discretion of the qualified biologist. Any changes to buffer sizes and/or nest monitoring frequency shall be documented and provided to the City of Escondido.

Level of Significance After Mitigation

With implementation of mitigation measure BIO-1, impacts to nesting birds and raptors would be less than significant. Impacts to special-status plant and wildlife species would remain less than significant.

4.3.5.2 Sensitive Natural Communities

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?

Impact Discussion

Of the vegetation communities identified within the BSAs, emergent wetland and non-native grassland are considered sensitive. Wetland and non-native grassland are sensitive vegetation communities proposed for conservation under the MHCP. The remainder of the site is composed of urban/developed, disturbed, and ornamental land and vegetation cover, which are not riparian habitats or sensitive natural communities. As shown in Table 4.3-1, the BSAs contain approximately 0.31 acre of emergent wetland and 7.18 acres of non-native grassland.

Construction of the project would result in the permanent removal of wetland habitat associated with the drainage comprising the 0.31-acre emergent wetland and of up to 7.18 acres of non-native grassland. In addition, construction activity occurring on the project site has the potential to result in indirect effects to the wetland habitat as a result of dust generation and runoff. Implementation of standard construction BMPs required by the Storm Water Pollution Prevention Plan (SWPPP) would prevent potentially significant indirect effects.

Level of Significance Prior to Mitigation

Implementation of the project could result in a substantial adverse effect on sensitive natural communities; therefore, direct impacts would be potentially significant. Indirect impacts on sensitive natural communities would be less than significant.

Mitigation Measures

BIO-2 Sensitive Vegetation Communities: Non-native Grassland. Prior to the issuance of a grading permit, direct impacts to 7.18 acres of non-native grassland shall be mitigated at a 0.5:1 ratio through purchase of mitigation credits at an approved mitigation bank.

BIO-3 Sensitive Vegetation Communities: Emergent Wetland. Prior to the issuance of a grading permit, direct impacts to 0.31 acre of emergent wetland shall be mitigated at a 3:1 ratio through off-site restoration, enhancement, and/or establishment/re-establishment or purchase of mitigation credits at a mitigation bank holding a Bank Instrument executed with the California Department of Fish and Wildlife (CDFW). Final mitigation requirements for impacts to emergent wetland shall be determined in consultation with the resource agencies (U.S. Army Corps of Engineers, CDFW, and Regional Water Quality Control Board) during the wetland permitting process.

Level of Significance After Mitigation

With implementation of mitigation measures BIO-2 and BIO-3, impacts to sensitive natural communities would be less than significant. Indirect impacts would remain less than significant.

4.3.5.3 Wetlands

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

Impact Discussion

The project site contains 0.31 acre of emergent wetland associated with the drainage extending from Brotherton Road south across the western portion of the project site parallel to Felicita Road. This aquatic feature consists of a stormwater swale and receives water from both on-site and off-site sources. Based on the wetland delineation conducted on the project site, this drainage is a potentially jurisdictional feature to USACE, RWQCB, and CDFW. The project would result in the permanent removal of this wetland and would require a CWA Section 404 Permit from the USACE, a CWA Section 401 Water Quality Certification from the RWQCB, and CFG Code Section 1602 Streambed Alteration Agreement from the CDFW. As described above in Section 4.3.5.2, implementation of construction BMPs required by the project's SWPPP would avoid indirect effects to the wetland during construction activities.

Level of Significance Prior to Mitigation

Implementation of the project could result in a substantial adverse effect on a state and federally protected wetland and impacts would be potentially significant. Indirect impacts would be less than significant.

Mitigation Measures

Implementation of mitigation measure BIO-3 would mitigate direct impacts to state and federally protected wetlands.

Level of Significance After Mitigation

With implementation of mitigation measure BIO-3, direct impacts to jurisdictional wetlands would be less than significant. Indirect impacts would remain less than significant.

4.3.5.4 Wildlife Movement

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Discussion

Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local

populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The project site is surrounded by developed land on all sides, including paved roads, residential properties, commercial buildings, a school, and I-15. The closest likely wildlife corridor is approximately 2.4 miles to the south along the San Dieguito River, which is separated from the project site by extensive development within the City. Since the project site occurs within a developed area and lacks connectivity to open space or wildlife corridors/linkages, the project site would not provide resources suitable for wildlife movement. Further, elevated noise levels, vehicle traffic, lighting, and human presence associated with the existing residential and commercial development and roadways surrounding the site decrease the suitability of the project area for wildlife movement. Therefore, construction of the project would not substantially interfere with wildlife movement or impede the use of nursery sites.

Level of Significance Prior to Mitigation

The project would not substantially interfere with wildlife movement and impacts would be less than significant.

Mitigation Measures

No significant impacts related to wildlife movement would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to wildlife movement would remain less than significant.

4.3.5.5 Local Policies Protecting Biological Resources

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Discussion

As described further in Section 4.3.2.3, the City regulates the removal of mature and protected trees in Municipal Code Sections 33-1068 and 33-1069. No oak trees were identified during surveys of the site (Michael Baker International 2023 and MNS Engineers 2024) and the property is not eligible for listing in the historic register (HELIX 2024b); therefore, no protected trees occur on the project site. While the project would remove some existing on-site ornamental trees, the project would plant a total of 682 trees (359 on the residential site and 323 on the church site) of varying sizes, which would replace the removed trees above the ratios required in the Escondido Municipal Code. In addition, the project would not impact adjacent off-site mature trees near the project site property lines.

Level of Significance Prior to Mitigation

The project would not conflict with local policies protecting biological resources and impacts would be less than significant.

Mitigation Measures

No significant impacts related to conflicts with local biological protection policies would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to local biological protection policies would remain less than significant.

4.3.5.6 Conservation Plans

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact Discussion

The project would occur within the boundaries of the County MHCP and draft Escondido MHCP Subarea Plan. However, the draft Escondido MHCP Subarea Plan has not been approved or adopted and remains in draft form; therefore, the policies and guidelines provided therein are not applicable to the proposed project. Nevertheless, the effects of the project were considered in the context of this draft plan. The project site is outside of proposed conservation areas and proposes habitat mitigation consistent with the ratios proposed in the draft Escondido MHCP Subarea Plan. Therefore, implementation of the proposed project would not preclude or prevent adoption of this draft habitat conservation plan.

Level of Significance Prior to Mitigation

The project would not conflict with the provisions of an adopted or approved habitat conservation plan and there would be no impact.

Mitigation Measures

No significant impacts related to habitat conservation plans would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. No impacts related to habitat conservation plans would occur.

4.4 Cultural Resources

This section provides an analysis of potential cultural resources impacts resulting from implementation of the proposed project. The existing conditions and regulatory framework related to cultural resources are also provided in this section. The following analysis primarily relies on the assessment of potential archaeological resources presented in the project's Cultural Resources Survey (HELIX 2024b), which is included as Appendix E to the EIR, and the assessment of potential built environment cultural resources presented in the project's Historic Resource Evaluation Report (HELIX 2024a), which is included as Appendix F to the EIR.

4.4.1 Existing Conditions

Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, and/or scientific importance. Significant resources are those resources that have been found eligible for the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP), as described further in Section 4.4.2. The project's Cultural Resources Survey and Historic Resource Evaluation Report include the results of records searches and archival research identifying potentially significant archaeological and historical resources within the project site.

4.4.1.1 Prehistoric Setting

The following cultural history outlines and briefly describes the known prehistoric cultural traditions in the vicinity of the project area. The approximately 10,000 years of documented prehistory of the San Diego region has often been divided into three periods: Early Prehistoric Period (San Dieguito tradition/complex), Archaic Period (Milling Stone Horizon, Encinitas tradition, La Jolla and Pauma complexes), and Late Prehistoric Period (Cuyamaca and San Luis Rey complexes).

Early Prehistoric Period Traditions/Complexes

The time period of the first known inhabitants of California, the Paleo-Indian or Big-Game-Hunting peoples of the last Ice Age, is labeled as the Early Man Horizon. The Early Prehistoric Period encompasses the Early Man Horizon within the Terminal Pleistocene (between 15,000 and 11,000 years ago) and the Early Holocene, beginning approximately 10,000 years ago (Erlandson et al. 2007:62 as cited in HELIX 2024b). In the western United States, most evidence for the Paleo-Indian or Big-Game-Hunting peoples during this time period derives from finds of large, fluted spears and projectile points (Fluted-Point Tradition) in places such as Clovis and Folsom in the Great Basin and the Desert Southwest (Moratto 1984:79–88 as cited in HELIX 2024b), with several, mostly isolated, occurrences of fluted spear points encountered on or near the coast of California (Dillon 2002; Rondeau et al. 2007 as cited in HELIX 2024b).

Three of these isolated fluted points or point fragments have occurred in San Diego County, all in the mountainous or eastern areas, one northeast of Warner Springs (Kline and Kline 2007 as cited in HELIX 2024b), one in Cuyamaca Pass (Dillon 2002; Rondeau et al. 2007 as cited in HELIX 2024b), and one near Ocotillo Wells (Rondeau et al. 2007 as cited in HELIX 2024b). Several others have occurred in proximity to the county, including one along the coast in adjacent southern Orange County to the northwest (Fitzgerald and Rondeau 2012 as cited in HELIX 2024b) and two in Baja California to the south (Des Lauriers 2008; Hyland and Gutierrez 1995 as cited in HELIX 2024b).

While isolated fluted point or point fragments have been found in the eastern mountainous area of San Diego County, the earliest reliably dated human habitation in the San Diego area during the Early Prehistoric Period is the San Dieguito Tradition/complex. The San Dieguito Tradition, with an artifact assemblage distinct from that of the Fluted Point Tradition, but which both Wallace (1955 as cited in HELIX 2024b) and Warren (1968 as cited in HELIX 2024b) defined for this period, has been documented mostly in the coastal or near the coastal area of San Diego County as well as in the southeastern California deserts (Carrico et al. 1993; Rogers 1939, 1966; True and Bouey 1990; Warren 1966, 1967; Warren and True 1961 as cited in HELIX 2024b), with only sparse evidence for it discovered in the coastal area north of San Diego County (e.g., Sutton and Grenda 2012 as cited in HELIX 2024b).

The San Dieguito Tradition is characterized by an artifact inventory consisting almost entirely of flaked stone biface and scraping tools but lacking the fluted points associated with the Fluted-Point Tradition. The subsistence system or emphasis of this tradition, while not yet entirely agreed upon, is suggested by Warren, based on an artifact assemblage of primarily hunting-associated tools, as having an orientation towards a hunting, rather than a gathering, economy in contrast to the more gathering-oriented complexes that were to follow in the Archaic Period (Warren 1967, 1968, 1987; Warren et al. 2008 as cited in HELIX 2024b). Other researchers have interpreted the San Dieguito subsistence system to be possibly ancestral to, or as a developmental stage for, the subsequent predominantly gathering-oriented "La Jolla/Pauma complex" (e.g., Bull 1983; Ezell 1987; Gallegos 1985, 1987, 1991; Koerper et al. 1991 as cited in HELIX 2024b). Based on uncalibrated radiocarbon dates, Warren originally indicated this tradition to have begun sometime before 9,000 years ago and to have ended sometime between 8,500 and 7,500 years ago (1967; 1968:4 as cited in HELIX 2024b).

The C.W. Harris Site (CA-SDI-149) is located along the San Dieguito River, approximately six miles southwest of the project area. The content of the earliest component of this site formed the basis upon which Warren and others (Rogers 1966; Warren 1966, 1967; Warren and True 1961 as cited in HELIX 2024b) identified the "San Dieguito complex," and, subsequently, Warren defined it as the San Dieguito Tradition (1968 as cited in HELIX 2024b). Diagnostic artifact types and categories associated with the San Dieguito Tradition include elongated bifacial knives; large leaf-shaped projectile points; scraping tools; crescentics; and in the desert, Silver Lake and Lake Mojave projectile points (Knell and Becker 2017; Rogers 1939; Vaughan 1982; Warren 1966, 1967 as cited in HELIX 2024b). Recent calibrations of previously uncalibrated radiocarbon dates for the San Dieguito complex from the Harris Site that ranged from sometime before 9030 ± 350 years before present (BP) to between 8490 ± 400 and 7620 ± 380 BP (Warren 1967, 1968 as cited in HELIX 2024b) indicate that the oldest of these dates are now actually between 10,000 and 11,000 BP (Warren and Ore 2011; Warren et al. 2008 as cited in HELIX 2024b). While most of the evidence for the San Dieguito Tradition has derived from sites like the Harris Site in the coastal region of San Diego County, artifacts attributed to the complex have also recently been found in the Cuyamaca Mountains area of the county, approximately 40 miles southeast of the project area (Pigniolo 2005 as cited in HELIX 2024b).

Archaic Period Traditions/Complexes

The Archaic Period, in the southern coastal region, dates from circa 8600 BP to circa 1,300 years ago (Warren et al. 2008 as cited in HELIX 2024b). A large number of archaeological site assemblages dating to this period have been identified at a range of coastal and inland sites. This appears to indicate that a relatively stable, sedentary hunting and gathering complex, possibly associated with one people, was present in the coastal and immediately inland areas of what is now San Diego County for more than 7,000 years. These assemblages, designated as the La Jolla/Pauma complexes, are considered part of Warren's

(1968 as cited in HELIX 2024b) "Encinitas Tradition" and Wallace's (1955 as cited in HELIX 2024b) "Milling Stone Horizon." In general, the content of these site assemblages includes manos and metates; shell middens; terrestrial and marine mammal remains; burials; rock features; bone tools; doughnut stones; discoidals; stone balls; plummets; biface points/knives; beads made of stone, bone, or shell; and cobble-based tools at coastal sites and increased hunting equipment and quarry-based tools at inland sites. As defined by True (1958 as cited in HELIX 2024b), the "Pauma complex" aspect of this culture is associated with sites located in inland areas that lack shellfish remains but are otherwise similar in content to the La Jolla complex. The Pauma complex may, therefore, simply represent a non-coastal expression of the La Jolla complex (True 1980; True and Beemer 1982 as cited in HELIX 2024b).

During the latter half of the Archaic Period, beginning approximately 5500 BP, a major shift in the subsistence system of prehistoric populations in the southern coastal region appears to have occurred. Artifacts such as dart points, mortars, and pestles, which are essentially absent during the Early Archaic Period, become increasingly present in site assemblages dating after circa 5500 BP. This evidence in the archaeological record is indicative of an increase in hunting activity and the gathering and processing of acorns for subsistence. Also noted by Warren (2012 as cited in HELIX 2024b), was an increase in the presence of larger mammal remains in La Jolla complex faunal assemblages during the latter part of the Archaic Period. This new and subsequently increasing use of these resources represents a significant shift in the Encinitas/La Jolla/ Pauma complex subsistence system in the southern coastal region (Warren et al. 2008; Warren 2012 as cited in HELIX 2024b).

Although early researchers attributed a number of inland sites in the project area vicinity to the Early Milling Stone Horizon and/or the La Jolla/Pauma complex (e.g., True 1980; Warren et al. 1961:10 as cited in HELIX 2024b), similar to the San Dieguito complex, most of the substantiating archaeological evidence for the Encinitas tradition/La Jolla/Pauma complex (Milling Stone Horizon) in present-day San Diego County is derived from sites in near coastal valleys, estuaries, and/or embayments that are present along the San Diego coast south of the San Luis Rey River (e.g., Cooley and Mitchell 1996; Cooley et al. 2000; Gallegos 1995:200; Pigniolo et al. 1991; Shumway et al. 1961; Smith and Moriarty 1985 as cited in HELIX 2024b). In the upper-elevation foothill and inland mountain areas of San Diego County, evidence for sites associated with the Archaic Encinitas Tradition/La Jolla/Pauma complex is less common relative to the Late Prehistoric complexes that succeed them (e.g., Chace and Sutton 1990; Cooley and Barrie 2004; Raven-Jennings and Smith 1999; True 1970 as cited in HELIX 2024b). McDonald (1995:14 as cited in HELIX 2024b) observed that "most sites in the Laguna Mountains can be expected to date from late prehistoric or ethnohistoric occupation of the region, and Archaic Period remains, while not unknown, are relatively rare." The location of the project area, nine miles from the coast, places it within the inland foothill area where sites that can be confirmed to be from the Archaic Period, and that contain La Jolla or Pauma complex assemblages, are less common (Warren et al. 2008 as cited in HELIX 2024b).

Between the project area and the coast, sites dating to the Archaic Period are more numerous. To the west of the project area, for example, along the coast around Batiquitos Lagoon, more than 20 sites have been documented spanning the early to middle Archaic Period from circa 8200 to 3500 BP (Gallegos 1991; Masters and Gallegos 1997 as cited in HELIX 2024b). Investigations of a shell midden deposit at site CA-SDI-10238, at the mouth of the San Dieguito River, indicate the occupation of the site spanning the Middle to Early Archaic Period, based on radiocarbon dates from 5790±110 to 7690±60 BP (Cooley et al. 2000 as cited in HELIX 2024b). Much of the radiocarbon records from the Del Mar Site (CA-SDI-10940), also located near the mouth of the San Dieguito River, similarly span this period (Cooley 2008 as cited in HELIX 2024b). The Harris Site (CA-SDI-149) and others in proximity to it along the San Dieguito River 6.5 miles southwest of the project area contain, in addition to the Early Prehistoric San Dieguito component mentioned above,

stratigraphic components with La Jolla complex assemblages dating to the Archaic Period (Carrico et al. 1993; Cooley 2006; Warren and True 1961; Warren et al. 2008 as cited in HELIX 2024b). As the distance from the coast increases, however, fewer sites dating to, or with definitive assemblages characteristic of, the Archaic Period have been documented. While not plentiful, some sites in foothill circumstances have been documented, such as site CA-SDI-4608 located near Poway, approximately 11 miles southeast of the project area and 15.3 miles from the ocean. This site has produced both radiocarbon dating and an assemblage that places at least a portion of it within the Archaic Period, circa 5000 BP (Raven-Jennings and Smith 1999 as cited in HELIX 2024b).

Late Prehistoric Period Complexes

The beginning of the Late Prehistoric Period is marked by evidence of a number of new tool technologies and subsistence shifts in the archaeological record. Compared to those shifts noted for the middle and late Archaic Period, those occurring at the onset of the Late Prehistoric Period were rather abrupt changes. The magnitude of these changes and the short period of time within which they took place seem to indicate a significant alteration in subsistence practices in what is now San Diego County circa 1500 to 1300 BP. The changes observed include a technological shift from the use of atlatl and dart to the bow and arrow; subsistence shifts that include a reduction in shellfish gathering in some areas (possibly due to silting of the coastal lagoons); and the storage of crops, such as acorns, by Yuman- and Takic-speaking peoples. New traits, such as the production of pottery and the cremation of the dead, were also introduced during the Late Prehistoric Period.

Movements of people during the last 2,000 years can account for at least some of these changes. Yuman-speaking people had occupied the Gila/Colorado River drainages of what is now western Arizona by 2,000 years ago (Moriarty 1968 as cited in HELIX 2024b) and then continued to migrate westward. An analysis by Moriarty (1966, 1967 as cited in HELIX 2024b) of materials recovered from the Spindrift site in La Jolla indicated a preceramic Yuman phase. Based on this analysis and a limited number of radiocarbon samples, Moriarty concluded that Yumans, lacking ceramic technology, penetrated into and occupied what is now the San Diego coastline circa 2,000 years ago. Subsequently, approximately 1,200 to 1,300 years ago, ceramic technology diffused into the coastal area from the eastern deserts. Although these Yuman speakers may have shared cultural traits with the people occupying what is now eastern San Diego County before 2000 BP, their influence is better documented throughout present-day San Diego County after 1300 BP with the introduction of small projectile points, ceramics, Obsidian Butte obsidian, and the practice of cremation of the dead.

Based on early research by Meighan (1954 as cited in HELIX 2024b) and True (1970 as cited in HELIX 2024b), two distinct archaeological complexes have been proposed for the Late Prehistoric Period in what is now San Diego County. The Cuyamaca complex is based on an analysis by True of archaeological excavations within Cuyamaca Rancho State Park and of the San Diego Museum of Man collections. Based on the results of this analysis, True (1970 as cited in HELIX 2024b) was able to define a Late Prehistoric Period complex for southern San Diego County that was distinct from Meighan's (1954 as cited in HELIX 2024b) San Luis Rey complex in the northern county area. The presence or absence, or differences in the relative occurrence of certain diagnostic artifacts in site assemblages provide the principal distinctions between these archaeological complexes. Cuyamaca complex sites, for example, generally contain both Cottonwood Triangular-style points and Desert Side-notched arrow points, while Desert Side-notched points are quite rare or absent in San Luis Rey complex sites (Pigniolo 2004 as cited in HELIX 2024b). Other examples include Obsidian Butte obsidian (which is far more common in Cuyamaca complex sites than in San Luis Rey complex sites) and ceramics that, while present during the Late Prehistoric Period throughout

what is now San Diego County, are more common in the southern or Cuyamaca complex portions of San Diego County where they occur earlier in time and appear to be somewhat more specialized in form.

Both complexes have produced a variety of vessel types, along with rattles, straight and bow-shaped pipes, and effigies. Interment of the dead at Cuyamaca complex sites is almost exclusively by cremation, often in special burial urns for interment, while archaeological evidence from San Luis Rey complex sites indicates both inhumation and cremation. A Cuyamaca complex artifact assemblage commonly contains Tizon Brown Ware pottery, various cobble-based tools (e.g., scrapers, choppers, and hammerstones), arrow shaft straighteners, pendants, manos and metates, and mortars and pestles. The arrow point assemblage often includes Desert Side-notched and Cottonwood Triangular points, with the Dos Cabezas Serrated type also sometimes occurring (McDonald and Eighmey 2008 as cited in HELIX 2024b).

Based on ethnographic data, including the areas defined for the Hokan-based Yuman-speaking peoples (Diegueño/Kumeyaay) and the Takic-speaking peoples (Luiseño) at the time of contact, it is generally accepted that the Cuyamaca complex is associated with the Yuman Diegueño/ Kumeyaay and the San Luis Rey complex with the Luiseño/Juaneño (Robbins-Wade 1986; True 1970; True and Waugh 1982 as cited in HELIX 2024b).

In contrast to Archaic Period sites, Late Prehistoric Period sites attributable to the San Luis Rey or Cuyamaca complexes are less common in the near-coastal areas of the county. Gallegos (1995:200 as cited in HELIX 2024b) states that "for San Diego County, there is temporal patterning, as the earliest sites are situated in coastal valleys and around coastal lagoons. Late Prehistoric Period sites are also found in coastal settings but are more common along river valleys and interior locations." The project area lies in an area that is marginal between the two complexes. It is also possible, now, to observe, however, that while a number of examples of Late Prehistoric Period sites that appear to be attributable exclusively to the San Luis Rey or Cuyamaca complexes have been identified for the near-coastal inland foothill areas of the county through diagnostic artifacts and/or radiocarbon dating (e.g., Chace and Hightower 1979:48; McCown 1945 as cited in HELIX 2024b), a number of sites containing evidence for both Late Prehistoric Period and Archaic Period occupations have also been documented (Carrico and Cooley 2005; Carrico et al. 1994; Cooley and Barrie 2004; Gross and Robbins-Wade 1992, 2010; McDonald et al. 1994; Raven-Jennings and Smith 1999; Willey and Dolan 2004 as cited in HELIX 2024b). It appears possible, therefore, that as more archaeological data accumulates, this geographic dichotomy of site locations between the Archaic and Late Prehistoric periods within the county may be found not to be completely valid.

Native American Perspective

In addition to the point of view discussed in the culture history above, it is recognized that other perspectives exist to explain the presence of Native Americans in the region. The Native American perspective is that they have been here from the beginning, as described by their creation stories. Similarly, they do not necessarily agree with the distinction that is made between different archaeological cultures or periods, such as "La Jolla" and "San Dieguito." They instead believe that there is a continuum of ancestry from the first people to the present Native American populations of San Diego (County of San Diego 2011 as cited in HELIX 2024b).

4.4.1.2 Historic Setting

The historic era (post-Contact) in southern California is commonly presented in terms of Spanish, Mexican, and American periods as described below.

Spanish Period

During the mid-eighteenth century, Spain escalated its involvement in California from exploration to colonization (Weber 1992 as cited in HELIX 2024b). In 1769, a Spanish expedition headed by Gaspar de Portolá and Junípero Serra traveled north from San Diego, seeking suitable locations to establish military presidios and religious missions to extend the Spanish Empire into Alta California. The Presidio of San Diego and Mission San Diego de Alcalá were established in 1769, followed by the Presidio of Monterey and Mission San Carlos Borromeo de Carmelo in 1770 in northern California. The missions and presidios stood, literally and figuratively, as symbols of Spanish colonialism, importing new systems of labor, demographics, settlement, and economies to the area. Agriculture and animal husbandry were the main pursuits of the missions.

Missions San Juan Capistrano and San Luis Rey de Francia, established in 1776 and 1798, respectively, claimed a large part of northern San Diego and southwestern Riverside counties. On the coast, the Luiseño and the Kumeyaay people were moved into the mission environment, where living conditions and diseases promoted the decline of the native populations (Bean and Shipek 1978 as cited in HELIX 2024b). However, throughout the Spanish Period, the influence of the Spanish progressively spread further from the coast and into the inland areas of southern California as the missions extended their influence into the surrounding regions and used the lands for grazing cattle and other animals. In the 1810s, ranchos and mission outposts, called asistencias, were established relatively near the project area, increasing the amount of Spanish contact in the inland region. An asistencia was established in Pala in 1816 and in Santa Ysabel in 1818.

Mexican Period

Mexico, including Alta California, gained its independence from Spain in 1821, but Spanish culture and influence remained as the missions continued to operate as they had in the past, and laws governing the distribution of land were also retained for a period of time. Following the secularization of the missions in 1834, large ranchos were granted to prominent and well-connected individuals, ushering in the Rancho Era, with the society transitioning from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. With the numerous new ranchos in private hands, cattle ranching expanded and prevailed over agricultural activities.

The project area is situated within the boundary of Rancho San Bernardo, which was granted to Don Jose Snook in 1842 by Governor Juan B. Alvarado (Hoffman 1862 as cited in HELIX 2024b). The 17,763-acre grant encompassed what is now Rancho Bernardo, 4S Ranch, the San Pasqual Valley, and Lake Hodges. Farming and ranching were the staple activities occurring within the Rancho during the Mexican Period; Snook stocked the ranch with large herds of cattle, sheep, horses, mules, and oxen (Rancho Bernardo Historical Society n.d. as cited in HELIX 2024b).

These ranches put new pressures on California's native populations, forcing them to acculturate or relocate farther into the backcountry. In rare instances, former mission neophytes were able to organize pueblos and attempt to live within the new confines of Mexican governance and culture. The most successful of these was the Pueblo of San Pasqual, located inland along the San Dieguito River Valley, founded by Kumeyaay, who were no longer able to live at the Mission San Diego de Alcalá (Carrico 2018; Farris 1994 as cited in HELIX 2024b).

American Period

American governance began in 1848, when Mexico signed the Treaty of Guadalupe Hidalgo, ceding California to the United States at the conclusion of the Mexican-American War. A great influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors, including the discovery of gold in the state in 1848, the end of the Civil War, the availability of free land through the passage of the Homestead Act, and later, the importance of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in American and European populations quickly overwhelmed many of the Spanish and Mexican cultural traditions, and greatly increased the rate of population decline among Native American communities.

While the American system required that the newly acquired land be surveyed prior to settlement, the Treaty of Guadalupe Hidalgo bound the United States to honor the land claims of Mexican citizens who were granted ownership of ranchos by the Mexican government. The Land Act of 1851 established a board of commissioners to review land grant claims, and land patents for the land grants were issued from 1876 to 1893.

In 1848, Snook died, leaving his widow Maria a life estate in the rancho; his brother, John, took ownership of the rancho. John Snook died in 1852, and Maria died in 1864. The ownership of the rancho was passed to relatives in England, who sold it in 1867 to Thomas Fox, who represented James McCoy (Rancho Bernardo Historical Society n.d. as cited in HELIX 2024b). As required by the Land Act of 1851, a claim for Rancho San Bernardo was filed with the Public Land Commission in 1852, and the rancho was later patented to Maria in 1874 (Willey 1886 as cited in HELIX 2024b).

City of Escondido

Escondido was incorporated as a city in 1888, with 249 residents (Walter 2010 as cited in HELIX 2024b). Offering free land to anyone who would build a church or school, the community soon had an elementary school, a large seminary built by the University of Southern California, and several churches. The Escondido Land & Town Company also sponsored the creation of a local newspaper, which was primarily used as an advertising tool targeting mid-western farmers in Escondido (Escondido History Center 2019 as cited in HELIX 2024b). As the community grew, a formal cemetery was needed, and Oak Hill Memorial Park (formerly called Oak Hill Cemetery) was established in 1889.

The Escondido region saw little change but continued as a major citrus-producing area in San Diego County until the 1950s (Van Wormer 2005 as cited in HELIX 2024b). Citrus and grapes remained the main crops, with avocado orchards appearing in the 1920s. Most residential development through the end of the nineteenth century consisted of “mini farms,” with the early commercial downtown area growing along Grand Avenue. Early twentieth-century residential neighborhoods were concentrated south of Grand Avenue and can be seen in today’s Old Escondido Historic District. The mid-1940s saw the peak of the citrus harvest, and the population reached approximately 5,000 by this time (City of Escondido n.d. as cited in HELIX 2024b).

Highway 395 was completed through the City in the 1950s, linking Escondido to San Diego. With convenient access to San Diego established, population and development in the region boomed, and many citrus groves became housing subdivisions (Escondido History Center 2019 as cited in HELIX 2024b). The citrus industry continued to decline in the 1960s, with an increasing number of citrus groves being converted to avocado groves, housing subdivisions, or commercial and civic development. The population

of the City increased dramatically over the following decades, with more than 16,000 residents present by 1960, and more than 36,000 residents present by 1970 (Escondido History Center 2019 as cited in HELIX 2024b). During this time, Escondido Boulevard became a commercial strip, with strip malls and large shopping centers prevailing farther out (City of Escondido n.d. as cited in HELIX 2024b).

4.4.1.3 Archaeological Resources

Records Search

HELIX obtained a records search from the South Coastal Information Center (SCIC) at San Diego State University on June 26, 2023 for the area with a one-mile radius around the project site. The records search results identified 68 previous cultural resource studies within the record search limits, 16 of which are within one half-mile of the project area. Two studies overlap the project site; both are draft EIRs for water treatment or distribution projects. Neither of these reports appear to have included a field survey of the project area. The SCIC has a record of 43 previously recorded cultural resources within a one-mile radius of the project, but none have been recorded within or adjacent to the project area. These include:

- Eight prehistoric sites consisting of bedrock milling features and artifact scatters;
- One prehistoric isolate consisting of one flake and one core;
- Two multi-component sites with prehistoric artifact scatters and historic structures or structure foundations;
- Three historic sites consisting of a rock and concrete bridge, a ranch complex, and a trash scatter;
- One historic road—historic Highway 395; and
- 28 historic buildings, mostly single-family homes dating from the 1890s to the 1950s.

Refer to Tables 1 and 2 of the Cultural Resources Survey in Appendix E of this EIR for a full list of previous cultural resource investigations and recorded sites within one mile of the project site.

Field Survey

A HELIX archaeologist and a Native American monitor conducted a pedestrian field survey of the project site on June 14, 2023 and July 5, 2024. During the archaeological field surveys, the undeveloped areas of the property were covered by dense non-native grasses and mulch, leaving a small amount of ground visible for inspection. No cultural material was observed during the field surveys of the project area.

4.4.1.4 Built Environment Historic Resources

As noted above, no previously recorded built environment historic resources were identified within the project site by the SCIC records search. Historic aerial photographs show the project area covered in a grove and housing a small structure from 1947 until 1967. By 1980, the area appears to have been graded, and the existing church and surrounding parking lot are located in the northeastern quarter of the project site. The surrounding area begins as plowed farmland and develops residential and infrastructure beginning in the 1960s. The church on the project site (Bethel Baptist Church) is proposed for demolition by the project and was constructed in 1976. Given its age, the structure was assessed for potential historical significance in the Historic Resource Evaluation Report (Appendix F). Fieldwork for the built environment analysis was conducted on June 21, 2023. The field survey included visual observations and

photo documentation to develop an architectural description and evaluate the potential significance of the building. The historical context and existing structure of the Bethel Baptist Church are described in further detail below.

Bethel Baptist Church History

Bethel Baptist Church was originally founded in Escondido, California, in 1949. In the summer of 1949, J.R. Butler, aided by Bennett Randels and Henry Crawford and sponsored by Calvary Baptist Church in Linda Vista, established a Southern Baptist fellowship group in Escondido. Bethel Baptist Church and Sunday School was the first Southern Baptist church in Escondido and was officially organized in December 1949 with Reverend Ben Wofford as its full-time pastor. At that time, the church had 55 charter members. In 1950, the church acquired property at the southeast corner of Redwood and 11th Streets (651 11th Street) in Escondido, and ground-breaking for the church occurred on March 19, 1950. The church building was completed in 1952, and the church was led by Reverend Everett Hill. Two more pastors succeeded Reverend Hill at Bethel Baptist, Reverend Orel Martin in 1957 and Reverend Arlie McDaniel in 1962, before Reverend John Swartz became the pastor in 1968. Reverend Swartz served the church through 1996 (Bethel Baptist Church 1999 as cited in HELIX 2024a).

Bethel Baptist Church was active in planting new churches in the area and assisted in establishing Broadway Baptist Church in 1955 and the First Baptist Church of Poway in 1959. With continuing growth in Bethel Baptist's membership, the congregation had outgrown the original building at Redwood and 11th Streets by the early 1970s. In 1974 the Redwood and 11th Street property was sold to the Salvation Army (and today is home to Grace Bible Church). With the proceeds of the sale, Bethel Baptist was able to acquire the current site on Brotherton Road, which was an orange grove at the time and provided more space for future growth (Bethel Baptist Church 1999 as cited in HELIX 2024a).

Bethel Baptist Church was designed by architect J. (James) Gary Shaw of Cleburne, Texas. A local architect, Richard B. Young, facilitated the procurement of permits but was not involved in the building's design. The County Planning Commission approved a special use permit on May 10, 1974, for the new church, with a variance for the 72-foot-tall steeple that exceeded the 35-foot height limit (City 2023 as cited in HELIX 2024a). The County issued the building permit in May 1974, and groundbreaking occurred soon thereafter (Times-Advocate 1974a, Bethel Baptist Church 2023, City 2023 as cited in HELIX 2024a). The new church was described as comprising "30,000 square feet, with space for 622 persons in worship and 600 in education...The facility will include a sanctuary, fellowship hall with kitchen facilities, five offices, church library and 26 classrooms" (Times-Advocate 1975 as cited in HELIX 2024a). Pews were installed in the sanctuary to provide seating for 572.

By November 1975, the City annexed property, including the church site within the City's boundaries, so the permitting process then came under the City's jurisdiction. The City required some fire-resistive construction changes to the building (City 2023 as cited in HELIX 2024a). The church was completed and dedicated on April 11, 1976, noted as Palm Sunday that year. By that time, the church membership had grown to 1,000 persons (Times-Advocate 1976 as cited in HELIX 2024a).

The church was constructed of precast concrete panels and some cast-in-place elements. The sanctuary and second floor ceilings were either stained or painted wood planks with laminated wood beams. The gabled roof portion behind the steeple was covered in asphalt composition shingles. The cultured stone on the front of the church flanking the steeple and entrance was replicated on the interior feature wall of

the church sanctuary, with what was referred to on the construction drawings as “tone chambers” with “grill cloth” covering them to both sides of the central baptistry (City 2023 as cited in HELIX 2024a).

Between 1980 and 1981 (according to historic aerials, as no permit records were found), a single-story Sunday School classroom addition and a kitchen addition had been added to the south side of the church. Through approvals of Conditional Use Permits 79-157 and 80-77, the addition of buildings for Sunday School as well as a school and daycare was approved for the church site. A separate Sunday School education building, 10,451 SF in size, was added east of the church on the north side of the property (Building A) in 1982. For a time in the 1990s, this building also provided a meeting space every Sunday for four mission churches. A second education building, 10,044 SF in size (Building B), that also served as a preschool for the community, was completed in 1993 just south of Building A. These buildings are separated from the church by a landscaped area.

Additional storage room additions to the kitchen and fellowship hall were completed circa 2000. Also in 2000, Nextel obtained permission to install a wireless communication facility at the church. The steeple tower was demolished (while removing and preserving the spire for reinstallation), and a new steel, wood, and fiberglass steeple tower approximately 10 feet taller than the original tower was built to house the antenna panels. The spire was reinstalled at the top of the steeple. A wireless equipment room was also added to the northeast corner of the church, along with electrical lines extending from the equipment room over the roof to the rear of the steeple (City 2023 as cited in HELIX 2024a). It may have been at that time that the gabled roof material was changed from asphalt composition to the concrete tiles that are present today. In 2009, accessibility improvements were planned and installed for the separate education buildings, and the Balboa Charter School occupied the buildings during the week for a time (Bethel Baptist Church 2023 as cited in HELIX 2024a).

Existing Church Building

Bethel Baptist Church is a one- and two-story building constructed primarily of reinforced precast concrete on a concrete slab with some cast-in-place elements. The building plan is wedge-shaped, oriented on a northwest to southeast axis. A single-story L-shaped element occurs along the south and east facades that converge to a point at the southeast corner. The north and west façades curve toward the entry element and essentially comprise the front elevation of the church. A main entry projection and steeple occur at the northwest corner, and the facades of the main portion of the church are two stories in height. The south side elevation is the single side elevation and exhibits the original side of the church where it is visible above and between three additional areas that obscure much of the original building elevation on this side. The rear elevation faces east toward the two modern education buildings and contains a single-story fellowship hall storage addition at the southerly end above which are the original angled southeast corners of the church. The main church wall rises above the single-story element and is a blank wall, with the exception of the vertical duct for the wireless electrical service.

The roofs are primarily flat, with only the entry element consisting of a gabled roof covered in non-original concrete S-tiles that is punctuated by the steeple at the gable end. This gabled element tapers and recedes in height as it extends on the northwest-to-southeast axis toward the southeast corner of the church’s two-story volume. The parapets surrounding the flat roofs are capped with metal flashing.

The lobby and sanctuary of the church building are original features of the church and described in further detail. Ancillary spaces including the fellowship hallway, classrooms, and various office spaces are newer additions to the church building and have typical finishes. The public lobby of the church, including its

layout, windows, and ceiling appear to be original. The lobby ceiling consists of stained wood planks and laminated wood beams that reflect the beginning of the tapered and gabled roof plan. Stairs to the right and left lead to a second-floor hallway; the finish material on the hallway railing may not be original. Continuing straight under the overhead hallway leads to doors entering the sanctuary.

The sanctuary space and ceiling appear to be original. Changes have been made to finish materials, and some of the original pews have been removed in favor of individual chairs. The most significant changes are to the main chancel feature wall and platform area. The wall, originally veneered in cultured stone, has been removed (or covered) and replaced with modern wood-trimmed sections filled with plastic panels featuring a faux basketweave detail, and a section clad in linear stacked stone at the center below the baptistry and cross. Screen monitors have been added on both sides, and doors are located where the tone chambers were (which originally extended to the floor based on a review of the church archives and historic photos on the lobby wall). The baptistry is reached through single doors, as well as doors from the hallway behind the sanctuary.

Additional descriptions and photographs of the existing structure are provided in the Historic Resource Evaluation Report (Appendix F).

Existing Education Buildings

Two, two-story education buildings are located east of the church building, separated by a landscaped area. The concrete block buildings are rectangular in shape, parallel to Brotherton Road and to each other, and are separated by a courtyard. The northerly building was built in 1982 and encompasses 10,451 SF. The southerly building was built in 1993 and encompasses 10,044 SF.

4.4.2 Regulatory Framework

4.4.2.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act (NHPA) and its implementing regulations (16 U.S.C. 470 et seq., 36 CFR Part 800) apply to projects with a federal nexus, such as permitting or funding from a federal agency. Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on "historic properties", that is, properties (either historic or archaeological) that are eligible for the NRHP.

The NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A property is eligible for the NRHP if it meets one of more of the following criteria:

- Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history;

- Criterion B: Is associated with the lives of persons significant in our past;

- Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or represents the work of a master, possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or

- Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history.

All resources that are eligible for listing in the NRHP must have integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Some aspects of integrity may be accorded more weight than others, depending on the type of resource being evaluated and the applicable eligibility criteria. Integrity can be assessed only after it has been concluded that a resource is significant. To retain integrity, a property must possess several, if not all, of these seven qualities, which are defined in the following manner in National Register Bulletin 15:

1. **Location.** The place where the historic property was constructed, or the place where the historic event occurred.

2. **Design.** The combination of elements that create the form, plan, space, structure, and style of a property.

3. **Setting.** The physical environment of a historic property.

4. **Materials** are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

5. **Workmanship.** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

6. **Feeling.** A property's expression of the aesthetic or historic sense of a particular period of time.

7. **Association.** The direct link between an important historic event or person and a historic property.

Under Section 106 of the NHPA, actions that alter any of the characteristics that qualify a property for eligibility for listing in NRHP "in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5[a]) constitute an adverse effect to the historic property.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act, Title 42 United States Code, Section 1996, protects Native American religious practices, ethnic heritage sites, and land uses.

Native American Graves Protection and Repatriation Act

Enacted in 1990, the Native American Graves Protection and Repatriation Act conveys to American Indians of demonstrated lineal decent, the human remains and funerary or religious items that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. It also makes

the sale or purchase of American Indian remains illegal, whether or not they derive from federal or Indian lands.

Secretary of the Interior's Standards

The Secretary of the Interior (SOI) is the head of the U.S. Department of the Interior, which is the nation's principal conservation agency. The department oversees agencies including the Bureau of Land Management, the Bureau of Indian Affairs, and the National Parks Service.

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation

The purpose of the SOI's Standards and Guidelines for Archaeology and Historic Preservation of 1983 is to (1) organize the information gathered about preservation activities; (2) describe results to be achieved by federal agencies, states, and others when planning for the identification, evaluation, registration, and treatment of historic properties; and (3) integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve the nation's culture heritage.

The Secretary of Interior Standards for Rehabilitation

Developed in 1986, the SOI's Standards for Rehabilitation are 10 basic principles created to help preserve the distinctive character of a historic building and its site, while allowing for reasonable change to meet new needs.

The Secretary of Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings

The SOI's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings were developed in 1995 to help protect the nation's irreplaceable cultural resources by promoting consistent preservation practices. The Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. As such, they cannot, in and of themselves, be used to make essential decisions about which features of a historic property should be saved and which might be changed. But once an appropriate treatment is selected, the Standards provide philosophical consistency to the work.

4.4.2.2 State Regulations

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (Public Resources Code [PRC] Section 5024.1(a)). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR.

For listing in the CRHR, a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Under CEQA Guidelines Section 15064.5(a)(4), a resource may also be considered a "historical resource" for the purposes of CEQA at the discretion of the Lead Agency.

Significant resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Resource integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance, is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. In an archaeological deposit, integrity is assessed with reference to the preservation of material constituents and their culturally and historically meaningful spatial relationships. A resource must also be judged with reference to the particular CRHR/NRHP criteria under which it is proposed for eligibility. It is possible that a resource whose integrity does not satisfy NRHP criteria may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Resources that have achieved significance within the past 50 years also may be eligible for inclusion in the CRHR, provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.

California Environmental Quality Act

PRC Section 21084.1, and CEQA Guidelines 14 Section 15064.5, address determining the significance of impacts to archaeological and historic resources and discuss significant cultural resources as "historical resources," which are defined in relation to the CRHR. More specifically, significant historical resources are defined as:

- resource(s) listed or determined eligible by the State Historical Resources Commission for listing in the CRHR (CEQA Guidelines Section 15064.5[a][1]);
- resource(s) either listed in the NRHP or in a "local register of historical resources" or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless "the preponderance of evidence demonstrates that it is not historically or culturally significant" (CEQA Guidelines Section 15064.5[a][2]); and
- resources determined by the Lead Agency to meet the criteria for listing on the CRHR (CEQA Guidelines Section 15064.5[a][3])

Section 15064.5(b)(1) of the CEQA Guidelines specifies that projects that cause "…physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired" shall be found to have a significant impact on the environment. Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the CRHR.

California Historical Landmarks

The State Historical Landmarks Program places an emphasis on well-known places and events in California history. The goals of the program include the preservation and maintenance of registered landmarks, most of which include missions, early settlements, battle sites, and gold rush sites.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act of 2001 conveys to American Indians of demonstrated lineal descent the human remains and funerary items that are held by state agencies and museums.

California Points of Historical Interest Program

The State Points of Historical Interest Program was established in the effort to accommodate local historic properties not able to meet the restrictive criteria of the State Historical Landmarks Program. The Points of Historical Interest Program requires the participation of local governmental officials, such as the chairperson of the Board of Supervisors, in the approval process.

Health and Safety Code Section 7050.5

Section 7050.5 of the H&SC provides the procedure to follow in the event that human remains are discovered outside of a dedicated cemetery. The section states:

a) Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.99 of the Public Resources Code. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.94 of the Public Resources Code or to any person authorized to implement Section 5097.98 of the Public Resources Code.

b) In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make their determination within two working days from the time the person responsible for the

excavation, or their authorized representative, notifies the coroner of the discovery or recognition of the human remains.

c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Public Resources Code Section 5097.98

Section 5097.98 of the PRC outlines the steps to be taken in the event that human remains believed to be of Native American origin are discovered. In accordance with H&SC Section 7050.5, the county coroner would contact the Native American Heritage Commission (NAHC) who would identify and notify the most likely descendant (MLD) of the human remains. The MLD may inspect the remains and make recommendations for their treatment, including but not limited to, removal, preservation in place, or other culturally appropriate treatment. PRC Section 5097.98 also provides the procedure to be followed in the event that no MLD is identified or no treatment options are agreed to by the landowner and MLD or NAHC.

4.4.2.3 Local Regulations

City of Escondido General Plan

Goals and policies regarding cultural resources within the City's General Plan Resource Conservation Element (City 2012a) include the following:

- **Goal 5:** Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.

- **Cultural Resources Policy 5.1:** Maintain and update the Escondido Historic Sites Survey to include significant resources that meet local, State, or federal criteria.

- **Cultural Resources Policy 5.2:** Preserve significant cultural and paleontological resources listed on the national, State, or local registers through maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.

- **Cultural Resources Policy 5.3:** Consult with appropriate organizations and individuals (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.

- **Cultural Resources Policy 5.4:** Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.

- **Cultural Resources Policy 5.5:** Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation,

rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.

- **Cultural Resources Policy 5.6:** Review the proposed new development and/or remodels for compatibility with the surrounding historic context.

- **Cultural Resources Policy 5.7:** Comply with appropriate local, State, or federal regulations governing historical resources.

- **Cultural Resources Policy 5.8:** Consider providing financial incentives, and educational information on existing incentives provided by the federal government to private owners and development in order to maintain, rehabilitate, and preserve historic resources.

- **Cultural Resources Policy 5.9:** Educate the public on the City's important historic resources to increase awareness for protection.

City of Escondido Local Register/Local Landmark Criteria

The procedures and criteria for register listing or local landmark designation are provided in the City's Municipal Code, Chapter 33, Article 40, Section 33-794 (c), which states:

> Prior to granting a resource local register or historical landmark status, the Zoning Administrator shall consider the definitions for historical resources and historical districts and shall find that the resource conforms to one or more of the criteria listed in this section. A structural resource proposed for the local register shall be evaluated against criteria number one through seven and must meet at least two of the criteria. Signs proposed for the local register shall meet at least one of the criteria numbered eight through 10. Landscape features proposed for the local register shall meet criterion number 11. Archaeological resources shall meet criterion number 12. Local register resources proposed for local landmark designation shall be evaluated against criterion number13. The criteria are as follows:
>
> (1) Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state, or nation;
>
> (2) Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
>
> (3) Escondido historical resources that are connected with a business or use that was once common but is now rare;
>
> (4) Escondido historical resources that are the sites of significant historic events;
>
> (5) Escondido historical resources that are fifty (50) years old or have achieved historical significance within the past fifty (50) years;
>
> (6) Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area, or district;

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

(8) Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;

(9) Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;

(10) Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;

(11) Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness, or aesthetic qualities;

(12) Escondido archaeological site that has yielded, or may be likely to yield, information important in prehistory;

(13) Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests.

4.4.3 Thresholds of Significance

Thresholds used to evaluate potential cultural resources impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant cultural resources impact could occur if implementation of the proposed project would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5;

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; or

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

4.4.4 Methodology and Assumptions

A Cultural Resources Survey (HELIX 2024b) and a Historical Resource Evaluation Report (HELIX 2024a) were prepared for the project site, which are provided as Appendices E and F of this EIR. As part of the Cultural Resources Survey, site records searches were conducted through the California Historical Resources Information System, SCIC at San Diego State University. The records search covered a one-mile radius around the project area and included the identification of previously recorded cultural resources and locations and citations for previous cultural resources studies. A review of the California Historical Resources and the state Office of Historic Preservation historic properties directories, and Local Register, was also conducted. Additionally, a field survey of the project area was conducted by an archaeologist and Native American monitor on June 14, 2023 and July 5, 2024. The project site was surveyed in parallel transects spaced five meters apart where the terrain and vegetation allowed.

The project's Historic Resource Evaluation Report (Appendix F) was prepared to assess whether the project would have any effects on historic built environment resources. The study included a site visit, background research, permit research, archival research at the church and various online repositories and websites, and a review of available historic maps and aerial images. Fieldwork for the built environment analysis of the church building was conducted on June 21, 2023 by an architectural historian. The fieldwork included visual observations and photo documentation to develop an architectural description and evaluate the potential significance of the building.

4.4.5 Project Impact Analysis

4.4.5.1 Historical Resources

Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Impact Discussion

Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the CRHR. As noted in Section 4.3.1.1, no previously recorded historic resources were identified on the project site in the SCIC records search. However, based on the age of the existing church building on the project site that is proposed to be demolished, the structure was evaluated in accordance with the NRHP, CRHR, and City criteria related to listing of historic resources. The two existing education buildings were not evaluated, as they were constructed during the 1980s and 1990s and are thus not of sufficient age to qualify as historical resources under CEQA or historic properties under the NHPA.

Historic Resource Evaluation

Significance Criteria A/1/(4)

NRHP Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history.

CRHR Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

City Criterion (4): Site of significant historic events.

No important events occurred at Bethel Baptist Church that would be considered significant contributions to the broad patterns of our nation's, state's, or City's history and heritage have been identified. While the church is reported to be the first Southern Baptist congregation organized in Escondido, that fact alone does not appear to have any significance at the national or state level and does not appear to have been a significant event in the City's history. Moreover, if this fact were considered to be significant, the original church location at Redwood and 11th Streets is still extant and would be more directly related to the church's founding. Therefore, the existing property does not appear significant under Criteria A/1/(4).

Significance Criteria B/2/(1)

NRHP Criterion B: Is associated with the lives of persons significant in our past.

CRHR Criterion 2: It is associated with the lives of persons important in our past.

City Criterion (1): Is strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state, or nation.

The Historic Resource Evaluation Report did not identify any significant persons associated with Bethel Baptist Church who made important contributions to the nation's, state's, or City's history. Therefore, the existing property does not appear significant under Criteria B/2/(1).

Significance Criteria C/3/(2) and (7)

NRHP Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or represents the work of a master, possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

CRHR Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

City Criterion (2): Embodies distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered.

City Criterion (7): One of the few remaining examples in the city possessing distinguishing characteristics of an architectural type.

The layout of the church and its focal element above the entrance is fairly typical of modern-style churches built in the middle of the 20th century. Although the footprint is not circular, the wedge shape allows for a sense of circular interior access and fan-shaped sanctuary space which, again, is fairly typical of modern-era churches. The modern layout is indicative of a move away from historical cruciform precedents (although it should be noted that many churches in the 20th century to the present day still follow a cruciform layout). The exterior massing evokes elements of the Brutalist style that was more typical of sports arenas and performance venues, but also presaged the late 20th century and early 21st century congregations that either occupied industrial buildings or constructed similar purpose-built churches. At the same time, the front entrance with soaring steeple followed earlier, more traditional church design trends. The cultured stone veneer around the entrance that used to be present in the sanctuary harkened back to materials used in the Mid-Century Modern style more prevalent in the 1950s than in the mid-1970s. As a result, the church design utilized an eclectic vocabulary of elements and materials; as such, the church is not representative of any particular style.

An architect was identified in association with the church—J. Gary Shaw. Research did not identify much information about Shaw in relation to his career as an architect. According to the limited available information, James Gary Shaw was born in 1938 in Cleburne, Texas and is a retired architect who was a principal of J. Gary Shaw & Associates in Cleburne beginning in 1969. He was registered as an architect in

Texas, Oklahoma, and Louisiana, and was a member of the National Council Architects Registration Board in 1972. Shaw has been listed as a notable architect in Marquis Who's Who, but no other sources were found to indicate he was a significant architect.

The integrity of Bethel Baptist Church was affected in a significant way by the installation of wireless communication antenna panels by Nextel circa 2000. To achieve the necessary height for cellular transmissions, the panels were installed near the top of the steeple tower. The entire original concrete steeple tower was demolished, and a new steeple tower was constructed of steel, plywood, and exterior drywall to approximate the appearance of the original steeple tower. The original spire on top of the steeple was removed and reinstalled afterward. Whereas the original concrete steeple tower tapered and extended all the way to the spire element, the reconstructed steeple is comprised of two sections below the spire. The section below the spire is the steel and fiberglass section that houses the antenna panels. It is narrower than and steps in from the base of the tower. Because the steeple is taller, the original proportion of the tower itself, and in relation to the main church building, has changed significantly. In addition to this major exterior alteration, the later additions, circa 1981 and 2000, obscure the original building footprint and walls of the church.

Furthermore, as the church is a public space, the interior of the sanctuary has experienced some significant changes that affect the integrity of the original design. The same cultured stone used on the exterior entrance originally was used on the main feature wall of the sanctuary. In addition, the original tone chamber vertical elements faced with grill cloth on both sides of the central baptistry had a functional purpose but also created an additional design aesthetic for the interior space. The cultured stone and tone chambers have been removed and/or covered by faux basketweave plastic panels. The cultured stone below the baptistry was removed and/or covered with more modern stacked stone. Lastly, although it is considered a minor detail and could easily be restored, the framed vertical elements on the exterior that contain windows at both floor levels were originally highlighted with black or dark paint based on historical images. These elements are all painted the same color as the rest of the building, so they are not highlighted and no longer stand out as a decorative feature that helps to break up the horizontal massing of the building.

In conclusion, the architectural design of the church does not represent any particular architectural style and is not distinctive or unique. No master architect was associated with the design of the church. The integrity of the church has also been altered in a significant way, most notably with the demolition of the original steeple and replacement with a modern element with a different design and proportions, as well as the loss of the sanctuary's original architectural detail that complemented the church exterior. Therefore, the existing property does not appear significant under Criteria C/3/(2) and (7).

Significance Criteria D/4

NRHP Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

CRHR Criterion 4: It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

No evidence was found that the building is significant as a source or likely source of information about prehistoric or historic construction methods, materials, or technologies. Therefore, the existing property does not appear significant under Criteria D/4.

Significance Criterion (3)

City Criterion (3): Is connected with a business or use that was once common but is now rare.

Churches are common throughout the City, including Baptist and several other denominations. Bethel Baptist Church is not a use that was once common but is now rare. Therefore, the existing property does not appear significant under Criterion (3).

Significance Criterion (5)

City Criterion (5): Is fifty (50) years old or has achieved historical significance within the past fifty (50) years.

Since the church was completed in 1976, it is 47 years old and does not meet the threshold of this criterion. Even if the church were to meet the age criteria, the City requires a historic resource structure to meet at least two of the criteria numbered one (1) through seven (7). Based on the rest of this evaluation, the existing property does not meet any other criteria and the property does not appear significant under Criterion (5).

Significance Criterion (6)

City Criterion (6): Is an important key focal point in the visual quality or character of a neighborhood, street, area, or district.

The church is a large building located across a large field and on a rise when viewed from the intersection of Felicita and Brotherton Road. However, this fact alone does not lend importance to the building nor make it a focal point, let alone an important key focal point. The surrounding area is a mix of residential and rural parcels, with two other institutional uses nearby—Miller Elementary School at the northeast corner of Brotherton Road and Miller Avenue north of the project site and Life Care Center of Escondido north of the church on Felicita Road. The area east of the church is primarily residential neighborhoods, with residential and agricultural land south of the project site and the I-15 freeway located to the west. The neighborhood, streets, and area do not have an identifiable distinct character, and the church does not create such character in and of itself. Therefore, the existing property does not appear significant under Criterion (6).

Project Impacts

The project site does not contain recorded historic resources and the existing Bethel Baptist Church building does not meet the criteria for listing in the NRHP or CRHR and does not meet any local significance criteria. Furthermore, the existing education buildings are not of sufficient age to qualify as historical resources under CEQA or historic properties under the NHPA. Therefore, the existing on-site buildings are not considered to be historical resources under CEQA or historic properties under Section 106 of the NHPA. As such, demolition of the church building and/or modifications to the existing education buildings would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Level of Significance Prior to Mitigation

Implementation of the project would not result in a substantial adverse change in the significance of a historical resource. Impacts would be less than significant.

Mitigation Measures

No significant impacts related to historical resources would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to historical resources would remain less than significant.

4.4.5.2 Archaeological Resources

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Impact Discussion

As described in Section 4.3.1.1, the SCIC records search did not identify any previously recorded archaeological resources within the project site but identified 43 archaeological resources within one mile of the project site. The pedestrian survey of the project site also did not identify any archaeological resources within the project site; however, the visibility during the survey was poor. While there are no recorded or known archaeological resources within the project site, the presence of such resources within the project vicinity indicates the potential for these resources to be present within the project site. In addition, as described further in Chapter 4.12, *Tribal Cultural Resources*, the Sacred Lands File search was positive for tribal cultural resources. Therefore, ground-disturbing activities associated with project construction have the potential to cause a substantial adverse change in the significance of unknown archaeological resources.

Level of Significance Prior to Mitigation

Implementation of the project could result in a substantial adverse change in the significance of an unknown archaeological resource and impacts would be potentially significant.

Mitigation Measures

CUL-1 Tribal Cultural Resource Treatment and Monitoring Agreement. If requested by one or more participating tribes, the applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe(s) that is traditionally and culturally affiliated with the project area ("TCA Tribe(s)") prior to issuance of a grading permit to be submitted to the City. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources; and (2) to formalize protocols and procedures between the City, applicant, and the TCA Tribe(s) per the measures in this document for the protection and treatment of, including but not limited to, Native American human remains; funerary objects; cultural and religious landscapes; ceremonial items; traditional gathering areas; and cultural items located and/or discovered through a

monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities. A fully executed copy of the agreement and a wet-signed copy of the monitoring plan shall be provided to the City's Planning Department to ensure compliance with the conditions of approval.

CUL-2 Cultural Resources Monitoring Program. Prior to issuance of a grading permit, the applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology ("qualified archaeologist") to prepare a Cultural Resources Monitoring Program (CRMP) in coordination with participating tribe(s). The CRMP shall include any additional information that can be utilized to determine the appropriate monitoring program. The qualified archeologist and Native American monitor(s) associated with TCA Tribe(s) shall implement the monitoring program, as described in the CRMP. The archaeologist shall be responsible for coordinating with the Native American monitor(s). Verification shall be presented to the City in a letter from the qualified archaeologist that confirms that Native American monitor(s) representing requesting TCA Tribe(s) have been retained. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

CUL-3 Pre-construction Meeting. The qualified archaeologist and Native American monitor(s) shall attend the pre-grading meeting with the construction contractor to explain and coordinate the requirements of the CRMP.

CUL-4 Archaeological and Native American Monitoring. The qualified archaeologist and the Native American monitor(s) shall be on site as required by the CRMP during the initial grubbing, site grading, excavation or disturbance of the ground surface. The CRMP shall include protocols for monitoring and, if applicable, shall include any additional information and related monitoring procedures for specific areas of the project site that have been previously disturbed. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. The Archeologist and Native American monitor will submit weekly updates regarding on-site findings throughout excavation and prior to the monitoring report. Archaeological and Native American monitoring shall be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor(s), shall be responsible for determining the duration and frequency of monitoring.

CUL-5 Cultural Resources Discovery. In the event that previously unidentified cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor(s), shall have the authority to temporarily divert or temporarily halt ground disturbance in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored activity can proceed.

CUL-6 Assessment of Cultural Resources Discovery. If a potentially significant historical, unique archaeological, and/or tribal cultural resource is discovered, the qualified archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the affiliated identified through state-mandated consultation, and the Native American monitor(s), shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and the Native American monitor(s) and be submitted to the City for review and approval.

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

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

CUL-9 Tribal Cultural Resources. If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor(s) must be present. Moreover, if the qualified archaeologist does not collect the unearthed archaeological materials that qualify as tribal cultural resources, a Native American monitor may, at their discretion, collect the materials. All materials are to be kept on the project site in a secured location as agreed upon by the TCA Tribe(s) for later reburial on-site. Invasive or non-invasive testing is prohibited unless prior written permission from the affiliated Tribes has been received. Should the affiliated Tribes decline the collection, the collection shall be curated at a San Diego curation facility or a culturally-affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor(s), to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center. The project archaeologist must provide written proof to the City's Planning Division that the San Diego Archaeological Center accepted and received the collections within 6 weeks of completion of the Final Monitoring Report.

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

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

Level of Significance After Mitigation

With implementation of mitigation measures CUL-1 through CUL-10, impacts to archaeological resources would be less than significant.

4.4.5.3 Human Remains

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Discussion

No cemeteries, formal or informal, have been identified or are known to be present within the project site or area; however, it is possible for human remains to be discovered during certain construction activities. In the event that human remains are discovered, the County Medical Examiner would be contacted, and all procedures required by H&SC Section 7050.5 and PRC Section 5097.98 would be followed. These regulations ensure disturbance of the remains does not occur prior to investigation of the origin of the remains. If the remains are determined to be of Native American origin, the MLD, as identified by the NAHC, would be contacted in order to determine proper treatment and disposition of the remains. Compliance with these regulations would ensure that humans remains are not disturbed during project construction.

Level of Significance Prior to Mitigation

The project would not disturb human remains during project construction and impacts would be less than significant. Compliance with applicable regulations is also required by mitigation measure CUL-8.

Mitigation Measures

Mitigation measure CUL-8, above, would ensure compliance with applicable regulations related to the handling of human remains, if encountered during project construction.

Level of Significance After Mitigation

With implementation of mitigation measure CUL-8, impacts to human remains remain less than significant.

4.5 Energy

This section describes the existing conditions and regulatory framework related to energy use and conservation, and evaluates the potential impacts related to energy that could occur as a result of implementation of the proposed project. The following analysis partially relies on the project's Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), which is included as Appendix B to the EIR.

4.5.1 Existing Conditions

4.5.1.1 Electricity

Electricity usage for different land use categories varies depending on the type of electricity uses in a building, the types of construction materials used in constructing the building, and the efficiency of the electricity-consuming devices used within the building. Electricity usage per capita in California has remained stable for more than thirty years because of the state's energy efficiency building standards and efficiency and conservation programs, even as the national average electricity usage per capita has steadily increased (California Energy Commission [CEC] 2014).

California's electricity system has been undergoing a considerable shift from non-renewable to renewable sources in recent years. The energy resource mix has substantially changed in the past decade as new renewable energy sources have come online, and the CEC anticipates that out-of-state coal energy sources will be eliminated from the mix entirely by 2025 (CEC 2020).

SDG&E serves approximately 3.7 million customers in a 4,100-square-mile service area that includes San Diego and southern Orange Counties (SDG&E 2024). SDG&E currently provides electricity to the project site and would continue upon project implementation. According to the California Public Utilities Commission (CPUC), SDG&E customers consumed approximately 19,169 million kilowatt-hours (kWh) of electricity in 2015 (CPUC 2016). By 2030, SDG&E anticipates that it will achieve its goal of 60 percent of energy from renewable sources, all of which will be from long-term contracts (SDG&E 2022).

In 2022, total utility-scale electricity generation in the state of California was 287,220 gigawatt-hours (GWh), which was an increase of approximately 3.4 percent from 2021 (CEC 2022). CEC forecasts of future electricity demand anticipate that consumption will grow by between 0.99 and 1.59 percent per year from 2017 to 2030, with peak demand forecasts growing by 0.30 to 1.52 percent annually from 2017 to 2030 (CEC 2018). In San Diego County, the CEC reported an annual electrical consumption of approximately 19 billion kWh total with 6.6 billion kWh for residential use and 12.4 billion kWh for non-residential use in 2019 (CEC 2020).

4.5.1.2 Natural Gas

Natural gas utility rates and services are regulated by the CPUC. In 2018, California gas utilities forecasted that they would deliver approximately 4,740 million cubic feet per day of gas to their customers, on average, under normal weather conditions. The majority of natural gas utility customers in California are residential and small commercial customers, although these customers consume only approximately 35 percent of natural gas used in the state. SDG&E provides natural gas services to San Diego County and project area would continue to provide natural gas to the project site upon implementation of the project. SDG&E is a wholesale customer of Southern California Gas Company (SoCalGas) and currently receives all

its natural gas supply from the SoCalGas System. SDG&E provides service to over 800,000 customers (CPUC 2023).

The majority of natural gas used in California is sourced from out-of-state natural gas basins. The state does not receive liquefied natural gas supplies. Biogas, including gas from wastewater treatment plants and dairy farms, has recently begun to be used, and the State has been encouraging its development and expansion. Natural gas from out-of-state production basins is delivered to California via the interstate natural gas pipeline system. This gas is then delivered via SoCalGas and Pacific Gas and Electric (PG&E)'s statewide network to local transmission and distribution pipelines, or local storage fields (CPUC 2023).

Statewide natural gas demand is expected to decrease at an annual average rate of 1.0 percent through 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, and SB 350 goals. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (California Gas and Electric Utilities 2020).

4.5.1.3 Transportation Fuel

Automobiles and trucks consume gasoline and diesel fuel, which are non-renewable energy products derived from petroleum. As of the end of 2022, California had approximately 35.6 million registered vehicles which consumed approximately 13.9 billion gallons of gasoline during the year (California Department of Motor Vehicles [DMV] 2024, California Department of Tax and Fee Administration 2024). Gasoline and other vehicle fuels are commercially provided commodities that would be available to the proposed project through commercial outlets.

The 2021 Integrated Energy Policy Report (IEPR) provides the CEC's assessment of energy issues facing the state of California. The IEPR includes a transportation energy and demand forecast that considers vehicles and associated fuels, consumer preferences, regulatory impacts, economic and demographic factors, and projected improvements in technology. The most recent forecast estimated that between 2021 and 2035, gasoline fuel demand for transportation in California will decline primarily due to increases in electrification and the use of zero emission vehicles. Petroleum-based fuels will continue to represent the largest shares of transportation energy demand. Under the high-demand case for light duty vehicles, gasoline consumption will drop from approximately 13.8 billion gross gasoline equivalents (GGE) in 2020 to approximately 11 billion GGE in 2035. Electricity consumption for transportation would increase from less than one billion GGE in 2020 to approximately four billion GGE, which includes raw energy used by the plug in-vehicles (PEV), but also the gasoline energy avoided by using more PEVs. Diesel energy forecast is less than one GGE in 2020 and will remain roughly the same in 2035 (CEC 2021).

4.5.1.4 Existing Infrastructure

Electricity and natural gas service is currently provided to the project site by SDG&E. The project would connect to existing SDG&E infrastructure along Felicita Road and Brotherton Road. The project would remove three existing SDG&E power poles and underground existing overhead power lines along the project frontage on Felicita Road. The project applicant would coordinate with SDG&E for the undergrounding of these overhead lines. The existing power poles and overhead electric lines along Brotherton Road would remain in place. If the project utilizes natural gas, it would connect to the existing gas lines within Felicita Road and/or Brotherton Road.

4.5.2 Regulatory Framework

4.5.2.1 Federal Regulations

At the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Energy (DOE), and the USEPA are three agencies with significant influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through the establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major relevant federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

First enacted in 1975, the Federal Energy Policy and Conservation Act (EPCA) established fuel economy standards for on-road motor vehicles in the United States. The National Highway Traffic and Safety Administration (NHTSA), which is part of USDOT, is responsible for establishing additional vehicle standards and revising the existing standards under EPCA. Current standards require a combined passenger car and light duty truck average fuel economy of 49 miles per gallon by 2026 (NHTSA 2022). Heavy duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Fuel economy is determined based on each manufacturer's average fuel economy for their fleet of vehicles available for sale in the United States. On the basis of information gathered under the program, USDOT is authorized to assess penalties for noncompliance. Over its nearly 40-year history, this regulatory program has resulted in vastly improved fuel economy throughout the United States' vehicle fleet.

Energy Independence and Security Act of 2007

The federal Energy Independence and Security Act (EISA) of 2007 set increased fuel economy standards for motor vehicles as well as a renewable fuel standard, building energy efficiency standards, and appliance and lighting efficiency standards. The lighting efficiency standards required increasing levels of energy efficiency, ultimately requiring light bulbs by 2020 to consume 60 percent less energy and effectively phasing out the incandescent lightbulb.

Under the EISA, the EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. Under the EISA, the renewable fuels program was expanded to include diesel fuel in addition to gasoline. The EISA also required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces. Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. The ISTEA contained factors that metropolitan planning organizations were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation

decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution (USDOT 2020).

The Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century (TEA-21) builds upon the initiatives established in the ISTEA legislation discussed previously. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety (USDOT 2020).

4.5.2.2 State Regulations

At the state level, the CEC, CPUC, and CARB all regulate different aspects of energy. The CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting state fuel economy standards for new on-road motor vehicles. CARB has responsibility for mobile source emissions in the state.

This section focuses primarily on policies, regulations, and laws in the state of California that directly pertain to the regulation of energy resources. Refer to Section 4.6, *Greenhouse Gas Emissions*, for a discussion of policies, regulations, and laws that target the reduction of GHG emissions and are expected to achieve co-benefits in the form of reduced demand for energy-related resources and enhanced efficiencies related to energy consumption.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. In 2005, a second Energy Action Plan was adopted by the CEC and CPUC to reflect various policy changes and actions of the prior two years. In 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based in part on a finding that the state's energy policies have been significantly influenced by the passage of AB 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an "update" that examines the state's ongoing actions in the context of global climate change.

Renewable Portfolios Standard Program

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, in 2011 under SBX1-2, in 2015 under SB 350, and again in 2018 under SB 100, California's Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

SB 350, signed in 2015, increased the RPS from 33 percent in 2020 to 50 percent by 2030. This will increase the use of RPS eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

SB 100 was subsequently signed in 2018 and extends the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sale of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

AB 32 (2006) and SB 32 (2016)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020.

SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the H&SC to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by Executive Order (EO) B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO S-3-05 of 80 percent below 1990 emissions levels by 2050.

California Building Standards

Title 24, Part 6

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions.

The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards became effective on January 1, 2023. The 2022 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. New for the 2022 Title 24 standards are non-residential on-site photovoltaic (solar panels) electricity generation and storage requirements and electrification requirements for appliances and heating technologies (California Energy Commission 2022).

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are essentially a recipe or a checklist compliance approach.

Title 24, Part 11

The California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) is a code with mandatory requirements for all nonresidential buildings (including industrial buildings) and residential buildings for which no other state agency has authority to adopt green building standards. The current 2022 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings went into effect on January 1, 2023.

The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The 2022 CALGreen Code improves upon the 2019 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more.

CALGreen contains requirements for storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

AB 1493 and Fuel Efficiency Standards

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve “the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State.” On September 24, 2009, CARB adopted amendments to the Pavley regulations that intend to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California’s enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility. In January 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single packet of standards called Advanced Clean Cars (CARB 2024c).

4.5.2.3 Regional and Local Regulations

The City has collaborated with SANDAG and SDG&E to prepare a City of Escondido Energy Roadmap that identifies ways to save energy in government operations resulting in municipal cost savings and benefits to the environment. In addition, the City has created a “Go Green Escondido” web page that provides

information on how individuals, families, and businesses can reduce their carbon footprints and use less energy. In January 2011, the State of California adopted the CALGreen Building Code with mandatory measures that establish a minimum for green construction practices. In 2019, the City adopted the Green Building Standards Code and the California Energy Code to establish green building development standards for new projects with the intent to promote a healthier environment by encouraging sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality.

City of Escondido General Plan

The City of Escondido General Plan (City 2012a) includes various policies related to reducing GHG emissions and the co-benefit of reducing energy consumption in the Mobility and Infrastructure and Resource Conservation Elements. Applicable policies include the following:

Mobility and Infrastructure Element

- **Energy Goal 6:** An increased use of renewable energy sources, and improved energy conservation and efficiency.

- **Energy Policy 16.2:** Continue to work with local utility providers to ensure that adequate electricity and natural gas services and facilities are available for new and existing development.

- **Energy Policy 16.3:** Implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities.

- **Energy Policy 16.4:** Encourage site and building design that reduces exterior heat gain and heat island effects (tree planting, reflective paving materials, covered parking, cool roofs, etc.).

- **Energy Policy 16.5:** Require, to the extent feasible, building orientations and landscaping that use natural lighting to reduce energy demands.

- **Energy Policy 16.6:** Evaluate and amend appropriate codes and ordinances in order to facilitate and encourage the installation of renewable energy systems and facilities (solar, wind, hydro-power, geothermal, and bio-mass), where appropriate, for all development.

- **Energy Policy 16.13:** Require new utility lines to be constructed underground, and along existing utility corridors, when feasible.

Resource Conservation Element

- **Air Quality and Climate Protection Goal 7:** Improved air quality in the city and the region to maintain the community's health and reduce greenhouse gas emissions that contribute to climate change.

- **Air Quality and Climate Protection Policy 7.2:** Reduce regional greenhouse gas emissions through the following measures including, but not limited to:

a. Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.);

b. Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques;

c. Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities;

d. Encouraging the use of non-polluting alternative energy systems.

City of Escondido Climate Action Plan

In 2021, the City adopted an updated CAP to ensure compliance with updated state policies and regulations. In the CAP, the City reevaluated its GHG reduction targets and developed new goals, quantitative actions, and qualitative supportive measures. The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), and Guidance for Demonstrating Consistency with the City of Escondido CAP for Discretionary Projects Subject to CEQA Memorandum in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

As described in the CAP, energy-related emissions are generated through residential and non-residential electricity and natural gas use. Electricity and natural gas accounted for 27 percent and 12 percent of the City's 2012 emissions inventory, respectively. With a combined emissions contribution of 39 percent, the energy category is the second largest contributor to overall City emissions, exceeded only by on-road transportation which accounts for 53 percent of emissions (City 2020). Statewide energy efficiency and renewable energy programs will contribute to a reduction in emissions over time by increasing the amount of utility-supplied renewable energy and improving the energy efficiency of new buildings. At the local level, GHG emissions reductions would be achieved by improving energy efficiency of existing buildings and improving energy efficiency of new developments beyond State requirements. Initiatives directed under the energy category rely on efforts by local utilities, organizations, and agencies, with participation from the community.

The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. Strategies and measures related to energy include the following.

Strategy 1: Increase the Use of Zero-Emission or Alternative Fuel Vehicles

Measure T-1:3: Adopt an Ordinance to Require Electric Vehicle Charging Stations in Development. Adopt an ordinance, effective in 2023, that requires Level 2 or better EV charging stations to be installed in a minimum of ten percent of total parking spaces provided in new multi-family and new and existing commercial developments.

Strategy 4: Increase Building Energy Efficiency

Measure E-4.1: Require New Residential Developments to Install Alternatively-Fueled Water Heaters Adopt an ordinance, effective in 2023, requiring all new single-family and multi-family residential projects and significant remodels to install electric heat pump water heaters.

Measure E-4.2: Require New Multi-Family Residential Development to Install Electric Cooking Appliances. Adopt an ordinance, effective in 2023, requiring all new multi-family residential units and significant remodels to install only electric cooking appliances.

4.5.3 Thresholds of Significance

Thresholds used to evaluate potential impacts related to energy are based on applicable criteria in CEQA Guidelines Appendix G. A significant impact associated with energy could occur if implementation of the proposed project would:

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

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

4.5.4 Methodology and Assumptions

The evaluation of potential impacts related to energy usage that may result from construction and long-term operations of the project has been conducted as described below. This analysis of impacts to energy resources qualitatively discusses the proposed project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application, outlined above. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

4.5.5 Project Impact Analysis

4.5.5.1 Energy Consumption

Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Impact Discussion

The project would result in the demand for energy resources during both construction and long-term operations, as described below.

Electricity

Construction Use

Electricity used during project construction would be minimal. Temporary electric power would be provided by SDG&E for as-necessary lighting and electronic equipment (including use for computers, heating, ventilation, and air conditioning within construction trailers), and electrically powered hand tools. The electricity used for construction activities would be temporary and minimal.

Operational Use

At full buildout, the proposed project would require electricity for residential use, for operation of the redeveloped church, and for the 276 parking stalls that would be designated for electric vehicle charging

(222 for the residential portion and 54 for the church portion). CalEEMod (version 2022.1) default values for electricity consumption for residential land use were used to estimate emissions. Default energy use assumptions for the church redevelopment were used in the model. CalEEMod defaults assume implementation of energy-reducing efforts in compliance with the 2019 Title 24 standards. In accordance with updated 2022 Title 24 requirements for multi-family buildings, the modeling for the residential development also assumes the installation of on-site solar electricity generation with a capacity of 566.8 kilowatts. Emission factors used in the model are included in the project-specific Air Quality and GHG Emissions Technical Report in Appendix B (HELIX 2026).

The project includes various on-site features and measures to reduce the proposed project's energy consumption. The project would also be required to be consistent with the City's CAP Consistency Checklist, which would further reduce operational electricity consumption and the project would be built in compliance with the Title 24 requirements applicable at the time of construction.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during project construction. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the Petroleum Use section below. Any minor amounts of natural gas that may be consumed as a result of the project construction would be temporary and negligible and would not have an adverse effect on the environment.

Operational Use

To meet the requirements of the City's CAP, the project would be designed to include appliances that rely on electricity rather than natural gas. The project would utilize electric pump water heaters or zero emissions water heaters with equivalent efficiency and electric cooking appliances in the residential units, per Title 24 requirements. No hearths or woodstoves would be included in the project. Prior to project approval, the applicant would ensure that the proposed project would meet the Title 24 requirements applicable at that time, as required by state regulations through their plan review process. The project would implement energy efficiency design features to avoid any wasteful use of natural gas resources.

Petroleum Use

Construction Use

Petroleum-based fuel, including gasoline and diesel, would be the primary type of energy used for transportation-related activities during construction. Fuel consumed by construction equipment would be the primary source of energy consumption during construction, along with VMT associated with the transportation of construction materials and construction worker commutes. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the project site, would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site mainly in gasoline-powered vehicles.

Construction activities would include site preparation, demolition, grading, underground utility installation, building construction, paving, and architectural coatings. The underground utilities activity would include work with the Felicita Road and Brotherton Road ROW. Construction would require the use

of heavy off-road equipment. Construction equipment estimates for the project are based on site project information provided by the project applicant and default values for CalEEMod. Types of construction equipment anticipated to be used in project construction are discussed in more detail in Section 4.2.4.1 of this EIR.

Gasoline and diesel would also be consumed during worker commute and vendor delivery trips during construction. Worker commute trips are anticipated to vary between 6 and 217 trips per day depending on construction activity. Approximately 40 vendor trips are anticipated per day during building construction. Vegetation hauling during site preparation would result in 1 one-way trip per day per site, demolition debris hauling would result in 7 one-way trips per day from residential construction and 4 one-way trips per day from church construction, and soil export hauling during grading would result in 30 one-way trips per day. Paving would require the import of asphalt and concrete estimated to include 42 one-way trips per day (166 loads) during residential development paving and 19 one-way trips per day (77 loads) during church development paving (HELIX 2026). The CalEEMod default worker, vendor, and haul trip distances for San Diego County were used in the model.

The proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to no more than five minutes. Furthermore, the project's construction practices would be typical, and would not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuel would be required. Therefore, petroleum use during construction of the proposed project would be temporary and would not be wasteful or inefficient.

Operational Use

The majority of fuel consumption during project operations would be the result of residents' motor vehicles traveling to and from the project site. As discussed in Section 4.11, *Transportation*, with an anticipated 828 residents, the project is expected to generate a total of 14,987 VMT per day. When the mitigation measures in Section 4.11, *Transportation*, are included, the residential development would be expected to generate a total of 13,247 VMT per day. This would equate to approximately 1,548 ADT.

Over the lifetime of the proposed project, the fuel efficiency of the vehicles used by residents 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. This is largely due to increasing statewide fuel economy standards and an anticipated shift in the statewide vehicle fleet to increased numbers of electric vehicles. 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 (CARB 2013). The project would include at least 276 potential electric vehicle charging stations in its parking area, which would help support the shift towards electric vehicles.

While the proposed project would result in the consumption of petroleum-based fuels during operations, the increase would be consistent with the overall energy use projections for the state and region to meet the demands of anticipated future residential growth in these areas. Incorporation of the VMT-reducing mitigation measures discussed in Section 4.11, *Transportation*, are anticipated to reduce the total number and length of vehicle trips during operations, thereby reducing energy use from vehicular travel. Additionally, the project would include at least 276 potential electric vehicle charging stations, allowing for residents and church visitors to use electric vehicles and reducing the amount of petroleum-based

energy used by project operations and supporting the anticipated decrease over time in the use of petroleum-based fuels for transportation. The church development would replace an existing church building and no new petroleum-based energy use would result. Because of this, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Level of Significance Prior to Mitigation

While electricity and petroleum-based fuels would be consumed during project construction, their use would be temporary and compliance with applicable regulations would ensure that their use would not be wasteful or inefficient. Because the proposed project would be built to meet or exceed the City's CAP goals and applicable building standards, energy use during project operations would be minimized. With the implementation of VMT reduction measures and the installation of at least 276 potential electric vehicle charging stations, the use of petroleum-based fuels during operations would be reduced. Therefore, the proposed project would not result in the wasteful or inefficient use of energy resources. Impacts would be less than significant.

Mitigation Measures

No significant impacts related to wasteful or inefficient use of energy resources would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to energy use would remain less than significant.

4.5.5.2 Renewable Energy Plans

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

Impact Discussion

The proposed project would comply with applicable energy standards and regulations during construction and would be built and operated in accordance with existing, applicable building regulations at the time of construction, as mandated by Title 24 energy efficiency standards. As discussed in Section 4.6, *Greenhouse Gas Emissions*, the project would be consistent with the requirements of the City's CAP. As demonstrated in the CAP Consistency Checklist (City 2021b), the project would be consistent with required actions under the City's CAP.

Level of Significance Prior to Mitigation

The proposed project would not obstruct a state or local plan for renewable energy or energy efficiency, and the impact would be less than significant.

Mitigation Measures

No significant impacts related to consistency with renewable energy plans would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to consistency with renewable energy plans would remain less than significant.

This page intentionally left blank

4.6 Greenhouse Gas Emissions

This section provides an analysis of potential GHG emissions impacts resulting from construction and operation of the proposed project. The existing conditions and regulatory framework related to GHGs are also provided in this section. The following analysis primarily relies on the assessment of potential GHG emissions impacts presented in the project's Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), which is included as Appendix B to the EIR.

4.6.1 Existing Conditions

4.6.1.1 Climate Change Overview

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by naturally occurring atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting light in but preventing heat from escaping, thus warming the Earth's atmosphere. These gases allow solar radiation (sunlight) into the Earth's atmosphere but prevent radiative heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The temperature record shows a decades-long trend of warming, with 2016 and 2020 global surface temperatures tied for the warmest year on record since 1880 (National Aeronautics and Space Administration [NASA] 2024). The newest release in long-term warming trends announced 2022 ranked as tied with 2015 for the fifth warmest year on record with an increase of 1.6°F compared to the 1951-1980 average (NASA 2023). GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century (United Nations Intergovernmental Panel on Climate Change [IPCC] 2013). The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The statistical models show a "high confidence" that temperature increase caused by anthropogenic GHG emissions could be kept to less than two degrees Celsius relative to pre-industrial levels if atmospheric concentrations are stabilized at about 450 parts per million (ppm) carbon dioxide equivalent (CO_2e) by the year 2100 (IPCC 2014).

4.6.1.2 Greenhouse Gases

The GHGs, as defined under California's AB 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Although water vapor is the most abundant and variable GHG in the atmosphere, it is not considered a pollutant; it maintains a climate necessary for life.

Carbon Dioxide. CO_2 is the most important and common anthropogenic GHG. CO_2 is an odorless, colorless GHG. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of CO_2 include burning fuels, such as coal, oil, natural gas, and wood. Data from ice cores indicate that CO_2 concentrations remained steady prior to the current period for approximately 10,000 years. The

atmospheric CO_2 concentration in 2010 was 390 ppm, 39 percent above the concentration at the start of the Industrial Revolution (approximately 280 ppm in 1750). As of December 2023, the CO_2 concentration was 423 ppm, a 51 percent increase since 1750 (National Oceanic and Atmospheric Administration 2024).

Methane. CH_4 is a gas and is the main component of natural gas used in homes. A natural source of methane is from the decay of organic matter. Geological deposits known as natural gas fields contain methane, which is extracted for fuel. Other sources are from decay of organic material in landfills, fermentation of manure, and cattle digestion.

Nitrous Oxide. N_2O is produced by both natural and human-related sources. N_2O is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic (fatty) acid production, and nitric acid production.

Fluorocarbons. Fluorocarbons are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. Chlorofluorocarbons (CFCs) are nontoxic, nonflammable, insoluble, and chemically nonreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol.

Sulfur Hexafluoride. SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.

Global Warming Potential

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. CO_2e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report. In 2007, IPCC updated the GWP values based on the latest science at the time in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. In 2013, IPCC again updated the GWP values based on the latest science in its Fifth Assessment Report (AR5) (IPCC 2013). However, United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4. To comply with international reporting standards under the UNFCCC, official emission estimates for California and the U.S. are reported using AR4 GWP values, and statewide and national GHG inventories have not yet updated their GWP values to the AR5 values. GHG emissions in this analysis are reported using the AR4 GWP values.

By applying the GWP ratios, CO_2e emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.6-1, *Global Warming Potentials and Atmospheric Lifetimes*.

Table 4.6-1
GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIMES

Greenhouse Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50-200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-134a	14	1,430
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: IPCC 2007
HFC = hydrofluorocarbon; PFC = perfluorocarbon

4.6.1.3 Existing Greenhouse Gas Inventories

Worldwide and National GHG Inventory

In 2023, total anthropogenic GHG emissions worldwide were estimated at 49,100 million metric tons (MMT) of CO_2e emissions (Climate Watch 2026). The five largest emitting countries and the European Union (EU-27), together account for about 60 percent of total global GHG emissions: China (31 percent), the United States (13 percent), the European Union (about 8 percent), India (4 percent), the Russian Federation (2.5 percent) and Japan (2.2 percent). These countries also have the highest CO_2 emission levels (Climate Watch 2026).

Per the USEPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total United States GHG emissions were approximately 16,343 MMT CO_2e in 2022 (USEPA 2024e). The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 79.7 percent of total GHG emissions (5,053 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 93 percent of CO_2 emissions in 2022 (4,699 MMT CO_2e). Relative to 1990, gross United States GHG emissions in 2022 were lower by 3.0 percent, down from a high of 15.2 percent above 1990 levels in 2007. From 2021 to 2022, gross emissions increased by 0.2 percent (14.4 MMT CO_2e) and net emissions increased by 1.3 percent but decreased by 16.7 percent from 2005 levels. The increase in GHG emissions from 2021 to 2022 was driven largely by increased CO_2 fossil fuel combustion emissions across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic (USEPA 2024e).

State GHG Inventory

CARB performed statewide inventories for the years 2000 to 2023, as shown in Table 4.6-2, *California Greenhouse Gas Emissions by Sector*. The inventory is divided into five broad sectors of economic activity: agriculture, commercial and residential, electricity generation, industrial, and transportation.

Table 4.6-2
CALIFORNIA GREENHOUSE GAS EMISSIONS BY SECTOR

Sector	Emissions (MMT CO_2e)			
	2000	2010	2020	2023
Agriculture and Forestry	32.3 (7%)	33.7 (8%)	31.5 (9%)	29.2 (8%)
Commercial and Residential	44.8 (10%)	46.3 (11%)	42.0 (11%)	43.3 (12%)
Electricity Generation	104.7 (23%)	90.3 (21%)	59.5 (16%)	57.2 (16%)
Industrial	86.6 (19%)	82.4 (19%)	71.1 (19%)	66.9 (19%)
Transportation	176.5 (38%)	161.9 (37%)	135.5 (37%)	133.7 (37%)
Unspecified Remaining	13.7 (3%)	21.7 (5%)	29.7 (8%)	30.0 (8%)
TOTAL	**458.6**	**436.3**	**369.3**	**360.3**

Source: CARB 2026b
MMT = million metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 4.6-2, statewide GHG emissions totaled 458.6 MMT CO_2e in 2000, 436.3 MMT CO_2e in 2010, 369.3 MMT CO_2e in 2020, and 360.3 MMT CO_2e in 2023. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions (CARB 2026b).

Local GHG Inventory

As part of the baseline for the City's CAP, the City compiled a GHG inventory. The CAP baseline inventory is presented in Table 4.6-3, *2012 City of Escondido Greenhouse Gas Emissions Inventory*. Similar to statewide emissions, the on-road transportation sector contributed the most to GHG emissions in the City in 2012.

Table 4.6-3
2012 CITY OF ESCONDIDO GREENHOUSE GAS EMISSIONS INVENTORY

Sector	Emissions (MT CO_2e)
On-Road Transportation	498,000 (53%)
Electricity	256,000 (27%)
Natural Gas	118,000 (12%)
Off-Road Transportation	30,000 (3%)
Solid Waste	24,000 (3%)
Water	11,000 (1%)
Wastewater	6,000 (<1%)
TOTAL	**943,000**

Source: City 2021a
MT = metric tons; CO_2e = carbon dioxide equivalent

4.6.2 Regulatory Framework

4.6.2.1 Federal Regulations

Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that CO_2 is an air pollutant, as defined under the CAA, and that the USEPA has the authority to regulate emissions of GHGs. The USEPA announced that GHGs (including CO_2, CH_4, N_2O, HFC, PFC, and SF_6) threaten the public health and welfare of the American people (USEPA 2024b). This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the USDOT's NHTSA.

On June 30, 2022, the U.S. Supreme Court decision published in West Virginia v. U.S. Environmental Protection Agency overturned the USEPA's Clean Power Plan rule which cited Section 111(d) of the CAA for authority to set limits on CO2 emissions from existing coal- and natural-gas-fired power plants. The June 30, 2022 decision does not overturn the April 2, 2007 decision; however, it may limit the USEPA's authority to develop rules limiting GHG emissions without clear congressional authorization.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the NHTSA worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The USEPA established the first-ever national GHG emissions standards under the CAA, and the NHTSA established Corporate Average Fuel Economy standards under the Energy Policy and Conservation Act. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. In March 2022, the agencies finalized standards for model years 2024 through 2026 and established an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026.

4.6.2.2 State Regulations

There are numerous state plans, policies, regulations, and laws related to GHG emissions and global climate change. Following is a discussion of some of these plans, policies, and regulations that (1) establish overall state policies and GHG emission reduction targets; (2) require state or local actions that result in direct or indirect GHG emission reductions for the proposed project; and (3) require CEQA analysis of GHG emissions.

California Energy Code

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions.

The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards became effective on January 1, 2023. The 2022 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. New for the 2022 Title 24 standards are non-residential on-site photovoltaic (solar panels) electricity generation and storage requirements and electrification requirements for appliances and heating technologies (California Energy Commission 2022).

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards – the energy budgets – that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are essentially a recipe or a checklist compliance approach.

California Green Building Standards Code

CALGreen (CCR Title 24, Part 11) is a code with mandatory requirements for all non-residential buildings (including industrial buildings) and residential buildings for which no other state agency has authority to adopt green building standards. The current 2022 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings went into effect on January 1, 2023.

The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The 2022 CALGreen Code improves upon the 2019 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more.

CALGreen contains requirements for storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Executive Order S-3-05

On June 1, 2005, EO S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the European Union. California met the target of reducing GHGs emissions to 1990 levels by 2020, as established in AB 32. The EO B-30-15 emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

Senate Bill 32

SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the H&SC to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continuing efforts to pursue the long-term target expressed in EO S-3-05 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 197

A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment of a legislative committee to make recommendations about CARB programs to the legislature.

Assembly Bill 1493

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state." On September 24, 2009, CARB adopted amendments to the Pavley regulations that intend to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California's enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility. In January 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single packet of standards called Advanced Clean Cars (CARB 2024c).

Assembly Bill 341

The state legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 requires all businesses and public entities that generate 4 CY or more of waste per week to have a recycling program in place. The final regulation was approved by the Office of Administrative Law on May 7, 2012 and went into effect on July 1, 2012.

Executive Order S-01-07

This EO, signed by Governor Schwarzenegger on January 18, 2007, directs that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by the year 2020. It orders that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California and directs CARB to determine whether a LCFS can be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit reversed the District Court's opinion and rejected arguments that implementing LCFS violates the interstate commerce clause in September 2013. CARB is therefore continuing to implement the LCFS statewide.

Senate Bill 350

Approved by Governor Brown on October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

Senate Bill 100

Approved by Governor Brown on September 10, 2018, SB 100 extends the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sale of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

Executive Order N-79-20

EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-state sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium- and heavy-duty vehicles in the state will be zero-emissions vehicles by 2045 for all operations where feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero emissions by 2035 where feasible.

Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels.

AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

Senate Bill 905

Approved by Governor Newsom on September 16, 2022, SB 905, Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO_2 removal technologies and facilitate the capture and sequestration of CO_2 from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's metropolitan planning organizations (MPOs). CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare an SCS as an integral part of its RTP. The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy (APS) to meet the targets. The APS is not a part of the RTP. Qualified projects consistent with an approved SCS or APS categorized as "transit priority projects" would receive incentives to streamline CEQA processing.

California Air Resources Board: Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across California's society and economy to reduce emissions and reach climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG emission targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan, which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions

in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

4.6.2.3 Local Regulations

2025 Regional Plan

SANDAG's 2025 Regional Plan (Regional Plan) is the long-range planning document developed to address the San Diego region's housing, economic, transportation, environmental, and overall quality-of-life needs. The underlying purpose is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region. The 2025 Regional Plan is a long-range plan that considers how the community will grow, where residents will live, and how residents and visitors will move around the region. It combines the RTP, SCS, and Regional Comprehensive Plan. As such, the 2025 Regional Plan must comply with specific state and federal mandates. These include an SCS, per SB 375, that achieves GHG emissions reduction targets set by the CARB; compliance with federal civil rights requirements (Title VI); environmental justice considerations; air quality conformity; and public participation.

City of Escondido Climate Action Plan

The City's CAP provides a comprehensive roadmap to address the challenges of climate change in the City. The CAP aims to address climate change by reducing GHG emissions from activities within the City, and by identifying threats and strategies for adapting to adverse environmental conditions caused by climate change. The City first adopted a CAP in 2013. The 2013 CAP detailed the City's first communitywide GHG inventories for 2005 and 2010, which provided baseline emissions data from which future GHG emissions were estimated and reduction measures were developed.

The City's CAP was updated in March 2021. The updated CAP includes a new baseline GHG inventory for the year 2012, new projections of GHG emissions through 2035, and new GHG emissions targets to reduce citywide GHG emissions to 42 percent below 2012 levels by 2030 and 52 percent below 2012 levels by 2035 (City 2021a). The City's CAP is a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5. Development projects consistent with an applicable local qualified GHG reduction plan are eligible for streamlined GHG analysis. The 2021 CAP includes a CAP Consistency Checklist for streamlined review of a project's consistency with the CAP. The CAP Checklist review process is described further in Section 4.6.5.1 below.

City of Escondido Environmental Quality Regulations

The City's EQRs (Section 33-924 of the Escondido Municipal Code) contain GHG emissions screening thresholds used in combination with the CAP Consistency Checklist. Per Municipal Code Section 33-924(a)(6), GHG emissions for a land use development project would be less than significant for:

(A) Projects that do not generate more than 500 MT CO_2e GHG emissions and that are consistent with the General Plan, or

(B) Projects generating more than 500 MT CO_2e that are consistent with the General Plan, and that have demonstrated consistency with the CAP through completion of the CAP Consistency Checklist, adopted by separate resolution, or

(C) Projects generating more than 500 MT CO_2e that are consistent with the General Plan, and that cannot demonstrate consistency with the CAP through completion of the CAP Consistency Checklist due to unique land uses or circumstances for which no measures in the checklist would apply, but that can demonstrate consistency with the CAP through comparison to a numerical GHG threshold of 2.0 MT CO_2e per service population per year, or

(D) Projects that are not consistent with the General Plan and will generate greater GHG emissions than the allowable uses under the existing General Plan land use designation that demonstrate through a project-specific analysis quantifying GHG emissions that through mitigation and design features, the project reduces GHG emissions consistent with the CAP.

4.6.3 Thresholds of Significance

Thresholds used to evaluate potential GHG emissions impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant GHG emission impact could occur if the implementation of the proposed project would:

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

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

Given the relatively small levels of emissions generated by a typical development in relationship to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG impact is limited to cumulative impacts.

Development projects consistent with an applicable local qualified GHG reduction plan are eligible for streamlined GHG analysis under CEQA. The City's CAP is a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5. Development projects within the City which are consistent with the City's CAP would be consistent with statewide GHG reduction goals 2030 (per SB 32) and would demonstrate progress towards the 2050 GHG reduction goal established by EO S-3-05 (City 2021a; City 2021b).

As described in Section 4.6.2.3, The City's EQRs contain GHG emissions screening thresholds used in combination with the CAP Consistency Checklist. Per City Municipal Code Chapter 33, Article 47, Section 33-924(a)(6), GHG emissions for a land use development project would not be significant for:

(A) Projects that do not generate more than 500 MT of CO_2e GHG emissions and that are consistent with the general plan;

(B) Projects generating more than 500 MT of CO_2e that are consistent with the general plan, and that have demonstrated consistency with the CAP through completion of the CAP Consistency Checklist, adopted by separate resolution;

(C) Projects generating more than 500 MT of CO_2e that are consistent with the general plan, and that cannot demonstrate consistency with the CAP through completion of the CAP Consistency Checklist due to unique land uses or circumstances for which no measures in the checklist would apply, but that can demonstrate consistency with the CAP through comparison to a numerical GHG threshold of 2.0 MT CO_2e per service population per year; or

(D) Projects that are not consistent with the general plan and will generate greater GHG emissions than the allowable uses under the existing general plan land use designation that demonstrate through a project-specific analysis quantifying GHG emissions that through mitigation and design features, the project reduces GHG emissions consistent with the CAP.

4.6.4 Methodology and Assumptions

4.6.4.1 Emissions Modeling

GHG emissions were calculated using CalEEMod, Version 2022.1, as described in further detail in Section 4.2.4. Construction emissions were calculated based on the anticipated construction schedule (refer to Table 4.2-6), equipment mix (refer to Table 4.2-7), and vehicle trips. CalEEMod estimates construction GHG emissions for each year of construction activity based on the annual construction equipment profile and other factors determined as needed to complete all activities of construction by the target completion year. As such, each year of construction activity has varying quantities of GHG emissions. Per guidance from the SCAQMD, total construction GHG emissions resulting from the project are amortized over 30 years and added to operational GHG emissions.

Operational emissions were also estimated using CalEEMod. Operational sources of GHG emissions include area, energy, mobile, water use, and solid waste. The area and mobile source emissions assumptions related to pollutant emissions are provided in Section 4.2.4.2 and are consistent with the assumptions influencing GHG emissions. Assumptions related to energy, water and wastewater, solid waste, and refrigerant sources of GHG emissions are provided below.

Energy Sources

Development within the project would use electricity for lighting, heating, and cooling. Electricity generation typically entails the combustion of fossil fuels, including natural gas and coal, which is then transmitted to end users. Energy source emissions were estimated using CalEEMod defaults which assume implementation of energy-reducing compliance with the 2019 Title 24 standards. Default energy use assumptions for the project land use types were used in the model. In accordance with 2022 Title 24 requirements for multi-family buildings, the modeling also assumes the installation of on-site solar electricity generation with a capacity of 566.8 kilowatts for the residential development.

Water and Wastewater Sources

Water-related GHG emissions occur from the energy use for the conveyance and treatment of water and wastewater. CalEEMod uses the Maximum Applied Water Allowance method established under the California Department of Water Resources' 2015 Model Water Efficient Landscape Ordinance, and indoor residential water consumption based on per capita daily water use rates from the *Residential End Uses of Water* published by the Water Research Foundation to establish default water use (CAPCOA 2022). Modeling was conducted using these defaults.

Solid Waste Sources

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. Portions of these emissions are biogenic. CalEEMod methods for quantifying GHG emissions from solid waste are based on the IPCC method using the degradable organic content of waste. The default waste generation rate for the proposed land use types were used in modeling.

Refrigerant Sources

CalEEMod calculates GHG emissions associated with refrigerants (typically HFCs or blends of gases containing HFCs) which are emitted through leakage or maintenance from project refrigeration systems, freezers, and air conditioning systems. Refrigerant emissions were calculated using CalEEMod defaults.

4.6.5 Project Impact Analysis

4.6.5.1 Greenhouse Gas Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Discussion

For land use development projects in the City, the significance of a project's GHG emissions are determined utilizing the EQRs contained in Municipal Code Section 33-924(a)(6), and CAP Consistency Checklist. If the project would generate less than 500 MT CO_2e per year and would be consistent the City General Plan land use designation, the project's GHG emissions would be less than significant. If the project would generate 500 MT CO_2e per year or more, or if the project would not be consistent the City General Plan land use designation, the City's CAP Consistency Checklist (City 2021b) must be completed to determine the significance of the project's GHG emissions.

Construction Emissions

Project construction GHG emissions were estimated using CalEEMod and would be temporary. As shown in Table 4.6-4, *Construction Greenhouse Gas Emissions*, total GHG emissions associated with construction of the project are estimated at 1,790 MT CO_2e. For construction emissions, SCAQMD guidance recommends that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 59.7 MT CO_2e emissions per year.

Table 4.6-4
CONSTRUCTION GREENHOUSE GAS EMISSIONS

Year/Activity	Emissions ($MT CO_2e$)
2026 Construction	415.0
2027 Construction	913.0
2028 Construction	461.7
Total[1]	**1,789.7**
Amortized Construction Emissions[2]	*59.7*

Source: HELIX 2026
[1] Totals may not sum due to rounding.
[2] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.
MT = metric tons; CO_2e = carbon dioxide equivalent

Operation Emissions

Project operational GHG emissions were estimated using CalEEMod for the first full year of anticipated project operation (2029). These emissions are combined with amortized construction emissions and account for on-site solar electricity generation for the residential development discussed in Section 4.6.4. Annual emissions for comparison with the screening threshold are shown in Table 4.6-5, *Operational Greenhouse Gas Emissions*. In addition, as previously discussed in Section 4.2.5.2, no net increase in trips from the church development would occur and no emissions are quantified for church-related mobile sources. Other emissions associated with building operations are expected to decrease given the replacement of the church building with a more efficient building of similar size. Nonetheless, these emissions are conservatively included in the following analysis.

Table 4.6-5
OPERATIONAL GREENHOUSE GAS EMISSIONS

Emission Sources	2029 Emissions ($MT CO_2e$)
Area (Church)	0.4
Energy (Church)	60.9
Water/Wastewater (Church)	1.3
Solid Waste (Church)	44.3
Refrigerants (Church)	<0.1
Mobile (Residential)	1,677.7
Area (Residential)	4.0
Energy (Residential)	125.4
Water/Wastewater (Residential)	17.1
Solid Waste (Residential)	71.9
Refrigerants (Residential)	0.4
Subtotal[1]	**2,003.3**
Construction (Annualized over 30 years)	59.7
TOTAL[1]	**2,063.0**
Screening Threshold	**500**
Exceed Screening Threshold?	**Yes**

Source: HELIX 2026
[1] Totals may not sum due to rounding.
MT = metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 4.6-5, the project would result in GHG emissions of approximately 2,063 MT CO_2e per year starting in 2029. This would exceed the CAP consistency screening threshold of 500 MT CO_2e per year and completion of the City's CAP checklist is required.

CAP Checklist

HELIX prepared a CAP Consistency Checklist (City 2021b) for the project following the City guidance for demonstrating consistency with the CAP (City 2021c). Step 1, question 1 of the CAP Consistency Checklist is to determine if the project would be consistent with the existing General Plan land use designation and assumptions used in creating the CAP. The project would not be consistent with the existing General Plan land use designation; the project would require a General Plan Amendment to change the existing General Plan land use designation from PO to Urban V.

Step 1, question 2 of the CAP Consistency Checklist is to determine if the project would generate GHG emissions equal to or less than estimated emissions generated under the existing designation. The existing General Plan land use designation of PO for the project site has a maximum FAR of 2.0 (City 2012a). For the same developed area as the project (approximately 14.83 acres), the maximum buildout under the current General Plan designation would be an office development consisting of approximately 1,291,995 SF of floor space. Using CalEEMod and default settings, the resulting annual GHG emissions starting in 2029 would be 8,035 MT CO_2e per year. The proposed project annual GHG emissions of 2,063 MT CO_2e per year would be well below the maximum buildout emissions for a land use designation of PO.

Step 1, question 3 of the CAP Consistency Checklist is to determine if the project would exceed the screening land use levels. The residential development's proposed land use of 258 dwelling units would exceed the multi-family housing screening level of 55 dwelling units. Therefore, Step 2 of the CAP Consistency Checklist must be completed. Step 2, questions 1 through 9 are summarized below:

1. ***Electric Vehicle Charging Stations (Measures T-1.3 and T-1.4)*** *– All Projects: Will the project install electric vehicle charging stations (EVCSs) consistent with the following requirements:*

    - *Comply with the most recently updated version of the California Building Energy Efficiency Standards (Title 24, Part 6)?*

    - *For multi-family residential and commercial (i.e., office and retail commercial) projects, will the project install electric vehicle charging stations at a minimum of 10 percent of the total parking spaces provided?*

    - *For single-family residential projects, will the project install at least one EVCS in each new single-family home?*

Yes. The project is designed to comply with the current Title 24 standards and verification of compliance with these requirements would occur during building permit issuance. The residential development plans to provide 441 stalls, at least 45 of which would be designated for electric vehicles and equipped with EVCSs in accordance with the July 2024 update to the 2022 Title 24, Part 11 standards. The church development is not an office or retail commercial project; therefore, no EVCSs are required by the CAP. Nonetheless, the church development would comply with applicable requirements to install EVCSs in effect at the time of building permit issuance. Therefore, the project would be consistent with this measure.

2. ***Pedestrian Infrastructure (Measure T-3.2)*** *– All Projects: If the following conditions are met, would the project pay its fair-share contribution or fully install pedestrian infrastructure improvements?*

    - *The project frontage is located along a roadway for which pedestrian improvements are identified in the City's Street Design Manual, Pedestrian Master Plan, Trail Master Plan, or Safe Routes to School and Transit Plans;*

    - *The proposed project would include site design amenities with pedestrian access points from the existing, identified roadway; and,*

    - *The identified pedestrian improvements have not yet been installed. Or if they have been installed, the infrastructure is being redesigned, upgraded, and/or maintained to promote universal access.*

Yes. The existing sidewalk along Brotherton Road would remain in place, and the applicant proposes to install a new sidewalk along Felicita Road adjacent to the project site, along with an ADA accessible curb on the southeast corner of the intersection of Brotherton Road and Felicita Road. Access to the residential development would be provided by a new driveway off Brotherton Road (the existing driveway would be removed), and a proposed driveway off Felicita Road. Access to the church development would be provided from two entries along Brotherton Road generally where the existing access drives are located. The applicant proposes to construct approximately 320 feet of new sidewalk on the east side of Felicita Road between Brotherton Road and the current sidewalk about 320 feet to the north. In addition, the applicant proposes to implement pedestrian and network infrastructure improvements as mitigation for project VMT impacts that are specifically identified in the City's VMT Exchange Program (refer to Mitigation Measure TRA-1) in Section 4.11, *Transportation*.

3. ***Transportation Demand Management and Transit (Measures T-3.4 and T-3.6)*** *- Non-Residential Projects: If the project is located within the Downtown Specific Plan, South Centre City Specific Plan, or East Valley Parkway Specific Plan, will the project implement Transportation Demand Management program?*

Not Applicable. The project is not located within the Downtown Specific Plan, South Centre City Specific Plan, or East Valley Parkway Specific Plan.

4. ***Bicycle Infrastructure (Measure T-3.5)*** *- All Projects: If the following conditions are met, would the project pay its fair-share contribution to bicycle infrastructure improvements?*

    - *Intersection or roadway improvements are proposed as part of the project; and*

    - *The City's Bicycle Master Plan identifies bicycle infrastructure improvements at any intersection(s) or roadway segment(s) that would be impacted as part of the project.*

Not Applicable. The City's Bicycle Master Plan identifies existing bicycle lanes along the Felicita Road project frontage (City 2012c). The project would widen Felicita Road on the east side (project side) and as part of the widening would re-stripe the existing bicycle lane. Therefore, the Bicycle Master Plan improvements for project impacted roads and intersections are fully in place and would be remain with implementation of the project.

5. ***Alternatively Fueled Water Heaters (Measures E-4.1 and E-4.2)*** *- Residential Projects: If the project is a new single-family or multi-family residential development, will the project install electric heat pump water heaters?*

Yes. The residential development would utilize electric heat pump water heaters, or zero emissions water heaters with equivalent efficiency, per Title 24 requirements.

6. ***Electric Cooking Appliances (Measure E-4.2)*** *Multi-Family Residential Projects: If the project is a new multi-family residential development, will the project install only electric cooking appliances?*

Yes. The residential development would utilize only electric cooking appliances per Title 24 requirements.

7. ***Zero Net Energy (Measure E-5.2)*** *- Commercial Projects: If the project is a new commercial retail or office development, would the project achieve zero net energy (i.e., the total amount of energy used on-site is equal to the amount of renewable energy created on-site) and comply with the most recently updated California Building Energy Efficiency Standards (Title 24, Part 6)?*

Not Applicable. The project does not propose any commercial retail or office uses.

8. ***Landscape Water Consumption (Measure W-6.2)*** *- Residential Projects: If the project is proposing a single-family or townhome model home development, would the project:*

    - *Fully equip all model homes with greywater systems and rain barrels (or other rainwater capture systems); and,*

    - *Offer greywater systems and rain barrels (or other rainwater capture systems) as an add-on option for new homes.*

Not Applicable. The project is a multi-family residential complex and redeveloped church building. It is not a single-family or townhome model home development.

9. ***Tree Planting (Measure C-9.1)*** *- All Projects: Would the project plant trees consistent with the following requirements?*

    - *Would the project plant a minimum of one tree for every four new parking spaces and/or demonstrate 50 percent canopy coverage in parking areas?*

Residential Projects: In addition to the planting requirements above for all projects, would the project be consistent with the following requirement?

- *Would the project plant a minimum of one tree per dwelling unit or pay an in-lieu fee?*

Yes. The existing project site contains approximately 204 parking spaces, and the proposed project would provide 648 parking spaces, resulting in a total of approximately 444 new parking spaces. Therefore, the project would be required to plant a total of 111 trees to fulfill the "All Projects" requirement. Additionally, the project includes a residential development with 258 proposed dwelling units, resulting in a requirement of an additional 258 trees, making the total required number of trees at 369. The project plans to plant approximately 601 new trees and would therefore be consistent with this measure.

Level of Significance Prior to Mitigation

The project would exceed the applicable screening threshold for GHG emissions but would be consistent with the City's CAP Checklist. Therefore, impacts related to GHG emissions would be less than significant.

Mitigation Measures

No significant impacts related to GHG emissions would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to GHG emissions would remain less than significant.

4.6.5.2 GHG Reduction Plans

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Impact Discussion

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall state plan and policy is AB 32, the quantitative goal of which was initially to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the project's operational year is post-2020, the project aims to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

The project must also be constructed in accordance with the energy-efficiency standards, water reduction goals, and other standards contained in the applicable Title 24 Part 6 Building Energy Efficiency Standards and Part 11 (CALGreen) Building Standards. As discussed above, the project residences would be required to include alternatively fueled water heaters and electric cooking appliances per Title 24, and the project would be consistent with the City's CAP. The City's CAP was developed to ensure community-wide GHG emissions in the City would meet the state's 2020 and 2030 GHG reduction goals mandated by AB 32 and SB 32, and demonstrate progress towards achieving the 2050 reduction goal established by EO S-3-05. Therefore, because the project would be consistent with the City's CAP, the project would not conflict with state GHG reduction plans developed to achieve the goals of AB 32 and SB 32, including the CARB Scoping Plan.

Level of Significance Prior to Mitigation

The project would not conflict with any applicable GHG reduction plans, policies, or regulations, and no significant impacts would occur. Therefore, no mitigation measures are required.

Mitigation Measures

No significant impacts would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to conflicts with GHG reduction plans, policies, or regulations would remain less than significant.

This page intentionally left blank

4.7 Hazards and Hazardous Materials

This section of the EIR analyzes the potential for the proposed project to result in impacts related to hazards and hazardous materials. General information for this section is taken from the Escondido General Plan (City of Escondido 2012a) and the General Plan Program EIR (City of Escondido 2012b), unless otherwise referenced. Project-specific information is from the Phase I Environmental Site Assessment Report (FREY Environmental, Inc. 2022) and the Phase II Environmental Assessment Report FREY Environmental, Inc. 2023). These reports are included as Appendices G and H, respectively.

4.7.1 Existing Conditions

The Phase I Environmental Site Assessment (Phase I ESA) was completed to assess the likelihood of recognized environmental conditions (RECs) that might be present on the project site as a result of current or historical land uses or adjacent uses. The Phase I ESA included a site reconnaissance of the project site, reconnaissance of adjoining properties, a review of the historical usage of the project site, and a review of relevant documentation provided by various public and local agencies through various electronic databases listing possible hazardous waste-generating facilities on and within the vicinity of the project site. The Phase II ESA was completed to assess the site for the presence of arsenic and organochloride pesticides (OCPs) in shallow soil at the site. Samples were collected from the site and analyzed in a laboratory to determine the extent of potential impacts.

4.7.1.1 Terminology

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are used for a variety of purposes, including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Small-quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

Recognized Environmental Condition (REC), as defined in ASTM 1527-21, means (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

Controlled Recognized Environmental Condition (CREC), as defined in ASTM 1527-21, is a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

Historical Recognized Environmental Condition (HREC), as defined in ASTM 1527-21, is a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls.

De Minimis Condition (DMC), as defined in ASTM 1527-21, is a condition related to a release that generally does not present a threat to human health of the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. A condition determined to be a DMC is not considered a REC nor a CREC.

Chemical of Concern (COC), as defined in ASTM E2600-15, is a chemical that is present in the subsurface environment, has a vapor pressure greater than 1 millimeter of mercury, or a Henry's Law Constant greater than 1×10-5 atm m^3/mole at ambient temperature and pressure, and can potentially migrate as a vapor into the vadose zone of the subject property.

Area of Concern (AOC), as defined in ASTM E2600-15, for potential contaminated facilities with non-petroleum hydrocarbon COCs is equal to 1,760 feet around the subject property and 528 feet around the subject property for facilities with petroleum hydrocarbon COC.

Vapor Encroachment Condition (VEC), as defined in ASTM E2600-15, is the presence or likely presence of vapor phase COCs in the subsurface of the target property as identified during the vapor encroachment screening process.

4.7.1.2 Physical Setting

The project site is located in the Peninsular Ranges Geomorphic Province of Southern California, within the San Diego Embayment, which is bound to the north by the Santa Ana Mountains, on the east by several northwest trending fault zones, to the south by the US–Mexico border, and to the west by the Pacific Ocean The project site slopes to the south and has an elevation range of approximately 640 feet AMSL to 660 feet AMSL. Groundwater beneath the Site is estimated to be present at depths below 15 to 20 feet below ground surface (bgs) and is estimated to have an overall flow direction to the southeast.

4.7.1.3 On-site and Surrounding Uses

Based on aerial photographs of the site taken between 1939 and 1979, the site was previously used for agriculture (groves) until at least 1979. Agricultural land use is an environmental concern due to the potential application of arsenical pesticides and herbicides and OCPs to irrigated crops. Pesticides such as these are COCs that accumulate in near surface soils. Near surface soils have been disturbed due to grading activities across a large portion of the site; however, portions of the eastern, southern, and western areas of the site remain undeveloped since the grove was removed. The church building and parking lot were constructed in 1979 and by 1996, the project site was developed in its current configuration. The site is currently developed with a church and surface parking lots.

According to historical aerial imagery, the areas to the north, east, and south of the project site were developed for agricultural use from 1939 to at least 1953. Between 1964 and 1970, adjacent properties to the north were developed with residential housing and an elementary school. By 1979, adjacent properties to the east and south appear to be developed as they currently exist. Adjacent properties to the west were developed for agricultural use until at least 2005. By 2009, the western properties were developed as they currently exist.

4.7.1.4 Listed Hazardous Materials Sites

A search of federal, tribal, state, and local environmental regulatory agency databases was conducted to identify listed hazardous materials sites on and within the appropriate minimum search distances for each

database. The properties identified in the database searches included the project site and off-site listed facilities. A total of 37 reported facilities were identified in various databases within the search radius. Additional details on the databases searched and the search results are provided in Appendix G of this EIR. No listed facilities occur on the project site. Off-site listed facilities are summarized below.

State and Tribal Superfund Equivalent Sites

One facility was identified as a Superfund equivalent site, Chatham Brothers Barrel Yard located at 2257 Bernardo Road (1,703 feet west-southwest of the project site), is listed as having a past use of recycling used oil, halogenated solvents, unspecified solvent mixtures, and polychlorinated biphenyls (PCBs). This facility is listed on Geotracker with a status of Open-Remediation as of 8/1/2000. The project site is located in the estimated hydrogeologic upgradient direction from this listed facility. Based on the distance and hydrogeologic location relative to the project site and historical data, this facility is not a REC or VEC.

State and Tribal Hazardous Waste Facilities

Nine facilities listed as state and federal hazardous waste facilities occur within one mile of the project site. These listed facilities and their distance from the project site are identified in Table 4.7-1, *Listed Hazardous Waste Facilities within the Project Area*.

Table 4.7-1
LISTED HAZARDOUS WASTE FACILITIES WITHIN THE PROJECT AREA

Listed Facility	Location	Distance/Direction From Project Site
Camp Escondido	Escondido	1,473 feet north-northwest
Redwood Terrace	710 West 13th Avenue	3,664 feet north
Amanda Lane	2115 Amanda Lane	5,031 feet west-northwest
Chatham Brothers Barrel	2257 Bernardo Road	1,703 feet west-southwest
New Urban West/Escondido Site	815 Hamilton Lane	2,043 feet south-southwest
Brotherton Plaza	2250 South Escondido Boulevard	2,709 feet east
Bernardo Elementary	Bernardo Avenue/Mountain Heights Road	3,627 feet southwest
Elderlink	1151 Redwood Street	4,229 feet north
Vacant Lot	1401 South Escondido Boulevard	4,668 feet north-northeast

Source: FREY Environmental, Inc. 2022

Camp Escondido, a former military encampment from World War II comprising approximately seven blocks spanning northwest to southeast from 5th Street to 11th Street and northeast to southwest from Quince Street to Tulip Street, is listed as having explosives as a potential COC. There are no records indicating the presence or use of explosives at the facility. Additionally, there are no records indicating that fuel tanks were used or installed at the facility. Based on the information provided, this listing is not a REC. Chatham Brothers Barrel Yard, as discussed above, is not a REC. The rest of the listed facilities are outside the AOC for petroleum (528 feet) and non-petroleum (1,760 feet) hydrocarbons and are not considered RECs.

State and Tribal Leaking Storage Tanks

Three listed facilities with leaking storage tank cases are located within 0.5 mile of the project site, as identified in Table 4.7-2, *Listed Leaking Storage Tank Facilities within the Project Area*. Based on the

distances and hydrogeologic locations relative to the project site and case information review, these facilities are not considered RECs.

Table 4.7-2
LISTED LEAKING STORAGE TANK FACILITIES WITHIN THE PROJECT AREA

Listed Facility	Location	Distance/Direction From Project Site
Citracado Exxon/CDR Shell	825 Citracado Parkway	702 feet south
Chatham Brothers Barrel Yard	2257 Bernardo Road	1,703 feet west-southwest
Centax Homes	Citracado Parkway	2,144 feet east-southeast

Source: FREY Environmental, Inc. 2022

State and Tribal Voluntary Cleanup Sites

One listed voluntary cleanup facility, New Urban West/Escondido Site located at 815 Hamilton Lane (2,043 feet south-southwest of the project site), is listed as having arsenic and total petroleum hydrocarbon-motor oil as COCs. This facility is outside of the AOC for petroleum hydrocarbons (528 feet), and is not considered a REC.

Other Listed Facilities

There are 22 additional environmental facility listings on various databases, as well as one listed orphaned (unplottable) facility identified in the EDR Radius Map Report. Based on the information reviewed for these facilities none are considered RECs.

Site Reconnaissance

FREY conducted a site reconnaissance on September 14, 2022 that consisted of visual observations of the project site and the adjoining properties as viewed from the project site boundaries or from adjacent public thoroughfares. Building exteriors were observed along the perimeter from the ground, unless noted otherwise. The site reconnaissance included a visual review of the project site for past or present use, storage, handling, and disposal of potentially hazardous substances, and possible future releases of such substances. No RECs were observed during the site reconnaissance.

4.7.1.5 Contaminated Soil

Based on previous agricultural operations at the project site from at least 1939 through 1979, an REC exists due to the likely application of arsenical pesticides and herbicides and OCPs to irrigated crops. Pesticides such as these are COCs that accumulate in near surface soils. It is possible that near surface soils, particularly on the western and southern of the site (that has remained undeveloped since the on-site agricultural uses were removed) may contain COCs due to former agricultural use. As such, soil sampling was conducted on the site to characterize existing near surface soils for the presence of pesticides and herbicides. A total of 18 near surface soil samples were collected on November 11, 2022 and at a depth of approximately three to six inches below ground surface, and an additional 33 samples were collected on August 18, 2023 at depths of 0.5 feet bgs and 1.5 feet bgs. The collected samples were analyzed for arsenic and OCPs. Based on the soil samples collected and analyzed during this investigation, on-site soils within a portion of the site have limited and low concentrations of dieldrin from past agricultural use that exceed applicable screening level for residential uses.

4.7.1.6 Lead and Asbestos

Lead and asbestos were commonly used in building construction prior to 1980, although construction materials after 1980 may still include asbestos. If such materials are present, they may pose a risk to human health if they are disturbed and become airborne. On-site structures were constructed in the 1970s and therefore there is potential for the existing church building to contain asbestos containing materials (ACM) and/or lead-based paint (LBP).

4.7.1.7 Gas and Minerals

No oil or gas wells were identified within one mile of the project site in a review of the EDR Radius Map Report and the California Geologic Energy Management Division (CalGEM) Well Finder Website (CalGEM 2022). The EDR Radius Map report indicates that the project site is located in a low radon exposure zone according to a generalized assessment of radon potential in San Diego County. The USEPA lists San Diego County as Radon Zone Level 3, for areas where the indoor average radon level is less than 2 picocuries per liter (pCi/L) (USEPA 2002). According to the California radon database, radon in excess of the USEPA action level of 4 pCi/L was detected in 7 of 43 tests conducted in the 92025 zip code area.

4.7.1.8 Airport Hazards

Airport Land Use Commissions (ALUCs) assist local agencies in ensuring compatible land uses in the vicinity of existing or proposed airport; coordinate planning at state, regional and local levels; prepare and adopt airport land use policies; review plans or regulations submitted by local agencies; and review and make recommendation regarding the land use, building heights, and other issues related to air navigation safety and the promotion of air commerce. The San Diego County Regional Airport Authority is the ALUC for the San Diego region.

The closest airports to the project site are Ramona Airport, located approximately 10 miles to the southeast, and McClellan-Palomar Airport, located approximately 12 miles to the west. The Airport Land Use Compatibility Plans (ALUCPs) for these airports contain policies to promote land use compatibility between the airports and the adjacent and proximate land uses, to the extent these areas are not already developed with existing uses, and protect the public health, safety, and welfare. The project site is not located within the Airport Influence Areas (AIAs) of Ramona Airport or McClellan-Palomar Airport, which is the area in which airport-related noise, safety, airspace protection, and overflight notification factors may affect or necessitate restrictions on land uses.

4.7.1.9 Wildfire Hazards

The project site occurs in a developed area comprising single-family residential neighborhoods, schools, churches, commercial uses, and an agricultural use. The project site and surrounding area are not located within a designated Very High Fire Hazard Severity Zone (VHFHSZ) per the California Department of Forestry and Fire Protection. According to the City of Escondido General Plan's Community Protection Element, the project site and surrounding areas are located in a High Fire Hazard Zone (City 2012a).

4.7.2 Regulatory Framework

4.7.2.1 Federal Regulations

Chemical Accident Prevention Provision

The provisions listed under Part 68 of the CFR set forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accident releases, and the state accidental release prevention programs approved under Section 112(r) of the Clean Air Act.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendment and Reauthorization Act of 1986

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion.

Federal Aviation Regulations, Notice of Proposed Construction or Alteration

The Federal Aviation Administration (FAA), which has primary responsibility for the safety of civil aviation, imposes height restrictions in order to prevent obstructions to navigable airspace to protect flights and surrounding structures. In certain cases, the FAA should be notified of proposed development pursuant to Section 77.11 of Federal Aviation Regulations. The notification of proposed development enables the FAA to provide a basis for:

- Evaluating the effect of the construction or alteration on operational procedures and proposed operational procedures;
- Determinations of the possible hazardous effect of the proposed construction or alteration of air navigation;
- Recommendations for identifying the construction or alteration in accordance with current FAA Advisory Circular AC 70/7460-1K dated August 1, 2000, Obstruction Marking and Lighting;
- Determining other appropriate measures to be applied for continued safety of air navigation; and
- Charting and other notification to airmen of the construction or alteration.

Certain jurisdictions can request an FAA evaluation of proposed development when certain features appear to be potentially hazardous.

Federal Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions to coordinate disaster mitigation planning and implementation. States are encouraged to complete a "Standard" or an "Enhanced" Natural Mitigation Plan. "Enhanced" plans demonstrate increased coordination of mitigation activities at the state level, and, if completed and approved, increase the amount of funding through the Hazard Mitigation Grant Program. California's updated State Hazard Mitigation Plan was adopted in October 2010 and approved by the Federal Emergency Management Agency (FEMA) Region IX. Escondido is one of the cities covered by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan, described below, which is a countywide plan that identifies risks posed by natural and human-made disasters.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency.

Hazardous Materials Transport

The USDOT regulates transportation of hazardous materials between states. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are California Highway Patrol (CHP) and Caltrans. Together, these agencies determine container types used and license hazardous waste haulers for transportation of hazardous waste on public roads, including explosives that may be used for blasting.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required for fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 188 substances are listed as Hazardous Air Pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. The EPA is establishing regulatory schemes for specific source categories and requires implementation of maximum achievable control technologies for major sources of HAPs in each source

category. State law has established the framework for California's Toxic Air Contaminant Identification and Control Program, which is generally more stringent than the federal program, and is aimed at HAPs that are a problem in California. The State has formally identified more than 200 substances as toxic air contaminants and is adopting appropriate control measures for each. Once adopted at the state level, each air pollution control district will be required to adopt a measure that is equally or more stringent.

Renovating, Repair and Painting Rule

In 2008, EPA issued the Renovation, Repair and Painting Rule. This rule requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, childcare facilities, and schools be certified by EPA and use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an 8-hour training course from an EPA-approved training provider. Contractors must use lead safe work practices and follow these three simple procedures: (1) contain the work area; (2) minimize dust; and (3) clean up thoroughly.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives the USEPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

4.7.2.2 State Regulations

The state regulations that govern hazardous materials are equal to or more stringent than federal regulations. California has been granted primary oversight responsibility by the EPA to administer and enforce hazardous waste management programs. State regulations have detailed planning and management requirements to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human health and the environment. Several key state laws pertaining to hazardous wastes are discussed below. In addition, the DTSC, the SWRCB, and the Integrated Waste Management Act (IWMA) also regulate the generation of hazardous materials, also described below.

California Emergency Services Act

The California Emergency Services Act provides the basic authority for conducting emergency operations following a proclamation of emergency by the governor and/or appropriate local authorities. Local government and district emergency plans are considered to be extensions of the California Emergency Plan, established in accordance with the Emergency Services Act.

California Fire Code

The California Fire Code (CFC) is Chapter 9 of CCR Title 24. It is created by the California Building Standards Commission and is based on the IFC created by the International Code Council, described above. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code (CBC) use a hazard classification system to determine what protective measures are

required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every 3 years.

California Health and Safety Code, Hazardous Materials Release Response Plans and Inventory

Two programs found in the California H&SC Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Program (CalARP), which is the state adaptation of CFR Part 68, described above. The Department of Environmental Health (DEH) is responsible for the implementation of the HMBP program and CalARP in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulation. Congress requires USEPA Region 9 to make Risk Management Plan information available to the public through the USEPA's Envirofacts Data Warehouse.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs) or "Chisels" are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

California Integrated Waste Management Act

This act requires the development and implementation of household hazardous waste disposal plans. The Department of Resources Recycling and Recovery (CalRecycle), formerly the California Integrated Waste Management Board, oversees compliance with this act and enforces operational plans for solid waste facilities.

California State Fire Plan

The 2010 California State Fire Plan was the first statewide fire plan developed in concert between the State Board of Forestry and Fire Protection and CalFire. The central goals of the State Fire Plan include (1) improved availability and use of information on hazard and risk assessment; (2) land use planning, including general plans, new development, and existing developments; (3) shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as community wildfire protection plans; (4) establishing fire resistance in assets at risk, such as homes and neighborhoods; (5) shared vision among multiple fire protection jurisdictions and agencies; (6) levels of fire suppression and related services; and (7) post-fire recovery.

Emergency Services Act

Under the Emergency Services Act (California Government Code Section 8850 et seq.), the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Quick response to incidents involving hazardous materials or hazardous waste is a key element of this plan. The Governor's Office of Emergency Services administers the plan, coordinating the responses of other agencies, including EPA, CHP, RWQCBs, air quality management districts, and county disaster response offices.

Government Code Section 65962.5 (Cortese List)

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by the state and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other California state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Waste Control Act

The Hazardous Waste Control Act is implemented by regulations contained in California Code of Regulations (CCR) Title 26 that describe requirements for the proper management of hazardous wastes. The act created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, transporting, and disposing of such wastes. Under these regulations, the generator of hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

Health and Safety Code Section 25270, Aboveground Petroleum Storage Act

The Aboveground Petroleum Storage Act requires registration and spill prevention programs for above ground storage tanks (ASTs) that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs that are implemented by the RWQCBs and the State Water Resources Control Board. County Department of Environmental Health is the local administering agency for this program within the proposed project area.

Occupational Health and Safety Administration, Asbestos and Lead

The EPA, CalEPA, and the California Occupational Health and Safety Administration (OSHA) regulate hazardous materials, including asbestos- and lead-containing materials. EPA banned several asbestos-containing products in the 1970s (see 40 CFR Part 61, Subpart M; 16 CFR Part 1305; and 16 CFR 1304). Per OSHA (29 CFR 1926.1101 and 29 CFR 1910.1001), insulation, surfacing, asphalt, and vinyl flooring material prior to 1980 should be assumed to be asbestos-containing materials and handled accordingly. EPA and OSHA require proper abatement and disposal of asbestos- and lead-containing materials to protect human health and safety. If the abatement activities involve over 100 square feet of asbestos-containing materials, then the asbestos abatement is required to be completed or overseen by a certified consultant (Title 8 CCR, Article 2.6, Section 341.15). On a local level, these regulations are implemented through the SDAPCD and County Department of Environmental Health.

State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry Fire Protection)

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas (SRAs). Title 14 regulates that the future design and construction of structures, subdivisions, and developments in an SRA shall provide for basic emergency access and perimeter wildfire protection measures. The project site is not located in or near an SRA.

Senate Bill 1889, Accidental Release Prevention Law/California Accidental Release Prevention Program

Senate Bill 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the Accidental Release Prevention Law/California Accidental Release Prevention Program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The California Accidental Release Prevention Program addresses facilities that contain specified hazardous materials, known as regulated substances, that, if involved in an accidental release, could result in adverse off-site consequences. The California Accidental Release Prevention Program defines "regulated substances" as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Title 14, Division 1.5 of the California Code of Regulations

CCR Title 14, Division 1.5 establishes the regulations for CalFire and is applicable in all State Responsibility Areas where CalFire is responsible for wildfire protection. Development within State Responsibility Areas must comply with these regulations. Among other things, Title 14 establishes minimum standards for emergency access, fuel modification, property line setbacks, signage, and water supply.

Title 22 of the CCR and Hazardous Waste Control Law, Chapter 6.5

Under CCR Title 22, the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity; (2) ignitability; (3) corrosiveness; and (4) reactivity (CCR Title 22, Chapter 11, Article 3). A "hazardous material" is defined in Health and Safety Code Section 25501 as:

Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous materials in various forms can cause death; serious injury; long-lasting health effects; and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including County Department of Environmental Health.

Unified Program

CalEPA delegates to qualifying local agencies oversight and permitting responsibility for certain state programs pertaining to hazardous waste and hazardous materials. This is achieved through the Unified Program, created by state legislation in 1993 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following emergency and management programs:

- Hazardous materials release response plans and inventories (business plans);
- CalARP;
- Underground Storage Tank Program;
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure plans;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (tiered permitting) Programs; and
- California Uniform Fire Code: Hazardous material management plans and hazardous material inventory statements.

The County of San Diego is the designated certified unified program agency for all local jurisdictions within the San Diego region, including Escondido.

4.7.2.3 Local Regulations

Airport Land Use Commission and Airport Land Use Compatibility Plans

Airport Land Use Commissions assist local agencies in ensuring compatible land uses in the vicinity of existing or proposed airport; coordinate planning at state, regional and local levels; prepare and adopt airport land use policies; review plans or regulations submitted by local agencies; and review and makes recommendation regarding the land use, building heights, and other issues related to air navigation safety and the promotion of air commerce. The San Diego County Regional Airport Authority is the ALUC for the San Diego region.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains amendments to the California Fire Code. The purpose of consolidation of the County and local fire districts adoptive ordinances is to promote consistency in the interpretation and enforcement of the California Fire Code for the protection of public health and safety. The Consolidated Fire Code includes permit requirements for installation, alteration, or

repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the Consolidated Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

To comply with the Disaster Mitigation Act of 2000, the County of San Diego prepared the Multi-Jurisdictional Hazard Mitigation Plan. The plan serves as both a county-wide plan and a plan for local jurisdictions that identifies risks posed by natural and human-made disasters before a hazard event occurs. The plan includes overall goals and objectives shared by many jurisdictions, as well as specific goals, objectives, and mitigation action items for each of the participating jurisdictions to help minimize the effects of the specified hazards that could potentially affect their jurisdiction. Goals, objectives, and action items for the City of Escondido are included in this plan.

San Diego County, Site Assessment and Mitigation Program

County Department of Environmental Health maintains the Site Assessment and Mitigation (SAM) list of contaminated sites that have previously undergone or are currently undergoing environmental investigations and/or remedial actions. The San Diego County SAM Program has a primary purpose of protecting human health, water resources, and the environment within San Diego County by providing oversight of assessments and cleanups in accordance with the California Health and Safety Code and the CCRs. The SAM's Voluntary Assistance Program also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with hazardous substances.

San Diego County Operational Area Emergency Plan

In San Diego County, there is a comprehensive emergency plan known as the Operational Area Emergency Plan (OAEP). The OAEP describes a comprehensive emergency management system that 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 the components of a comprehensive emergency management system, and describes the overall responsibilities for protecting life and property and ensuring the overall well-being of the population. The OAEP is used by San Diego County and the 18 incorporated cities within the County to respond to major emergencies and disasters (City of Escondido 2012b).

City of Escondido Municipal Code, Chapter 7

Chapter 7, Sections 7-1 through 7-8, of the City's Municipal Code provides for the preparation and carrying out of plans for the protection of persons and property within the city in the event of an emergency. It also discusses coordination of the emergency functions of the city with all other public agencies, corporations, organizations, and affected private persons. Chapter 7 of the Municipal Code requires the City of Escondido Disaster Council to be responsible for development of the City's Emergency Action Plan for City Employees, which provides for the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency, state of emergency, or state of war emergency; and the organization, powers and duties, services, and staff of the emergency organization.

City of Escondido General Plan Community Protection Element

The City General Plan includes the Community Protection Element. The City's Community Protection Element addresses issues such as flood and fire hazards, geologic and seismic activity, and hazardous materials. Sections regarding Emergency Preparedness, Police and Fire service are also included. Applicable goals and policies include the following:

- **Disaster Preparedness and Emergency Response Goal 1:** A prepared and responsive community in the event of disasters and emergencies.
- **Fire Protection Goal 2:** Protection of life and property through adequate fire protection and emergency medical services.
- **Fire Protection Policy 2.8:** Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow requirements in the review of all development applications to minimize fire hazards.
- **Fire Protection Policy 2.14:** Require new development in high wildfire risk areas to incorporate site design, maintenance practices, and fire-resistant landscaping to protect properties and reduce risks.
- **Hazardous Materials Goal 8:** A safe and healthy community and environment that is protected from the use, storage, and transport of hazardous materials.

4.7.3 Thresholds of Significance

The following significance criteria are based on CEQA Guidelines, Appendix G, and provide the basis for determining the significance of impacts associated with hazards and hazardous materials from implementation of the proposed project. A significant impact related to hazards and hazardous materials could occur if implementation of the proposed project would:

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

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

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

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

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

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

g. Expose people or structures to a significant risk of loss, injury or death involving wildland fires.

4.7.4 Methodology and Assumptions

The analysis in this section is based on the results of the Phase I ESA and Phase II ESA prepared for the project and included as EIR Appendices G and H. The Phase I ESA included queries of hazardous site databases, review of historical imagery, a site reconnaissance survey, an interview, and review of City, County, and State records to assess the potential for hazardous materials on site.

The site reconnaissance was conducted on September 14, 2022 to observe and document existing site conditions. The site reconnaissance consisted of visual observations of the project site and the adjoining properties as viewed from the project site boundaries or from adjacent public thoroughfares. Building exteriors were observed along the perimeter from the ground and representative areas of the project site, where safely accessible, were observed. The site reconnaissance included a visual review of the project site for past or present use, storage, handling, and disposal of potentially hazardous substances, and possible future releases of such substances.

Available previous environmental reports and site records were reviewed, including those from the City's Fire Department and Building Department, the San Diego County Building Division, San Diego County Department of Environmental Health and Quality, DTSC EnviroStor website (DTSC 2022), and State Water Resources Control Board GeoTracker website (SWRCB 2024). Additionally, historic aerial photographs, historic U.S. Geological Survey topographic maps, City directories, and Sanborn Fire Insurance maps were reviewed. The regulatory database search was conducted by Environmental Data Resources, Inc. (EDR) and included a comprehensive search of listed facilities on numerous federal and state agency databases within varying radii from the project site.

The Phase II ESA utilized soil sampling and laboratory analysis to further investigate the potential presence of soil contaminants onsite. Because pesticides and herbicides are typically evenly spread across the area of interest, the soil sampling focused on soils within the upper two feet of the soil column to determine whether residual pesticides and herbicides are present at concentrations that exceed State health risk standards. Based on DTSC data from former agricultural properties, the only pesticide class requiring analyses at agricultural properties are OCPs (such as DDT, toxaphene, dieldrin). Most other classes of pesticides have relatively short half-lives and have not been found in the agricultural fields investigated. Based on data from former agricultural properties, the only heavy metal required for routine analysis is arsenic. Arsenic in the form of arsenical herbicides has been applied to many agricultural properties, and elevated levels of arsenic have been reported in the evaluation of these properties.

A total of 18 soil samples were taken on November 11, 2022 and collected at a depth of approximately 3 to 6 inches bgs. An additional 33 samples were collected on August 18, 2023 at depths of 0.5 foot bgs and 1.5 feet bgs. Soil samples were collected on approximately half-acre centers across the project site at locations marked by a land surveyor prior to arrival. Each sample was collected in a laboratory-supplied, sterile, eight-ounce glass jar. Sample containers were labeled using a waterproof marker, and sample labels included the sampler's initials, location identification, and time. A chain-of-custody manifest was completed on site and accompanied the samples to the lab. Laboratory analyses were conducted by State-certified, hazardous waste testing laboratories, including Eurofins Calscience (based in Tustin, California)

and by Jones Environmental (based in Santa Fe Springs, California). Soil samples were composited by the laboratories and analyzed for OCPs in accordance with EPA Method No. 8081A and for arsenic in accordance with EPA Method No. 6010B.

4.7.5 Project Impact Analysis

4.7.5.1 Routine Transport, Use, or Disposal of Hazardous Materials

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

Impact Discussion

Project construction would involve the on-site use and/or storage of hazardous materials/wastes such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The location of material storage and construction staging areas would be dictated by a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System General Construction Permit, which includes such measures as regular maintenance of construction equipment, and storage criteria for oil, gasoline, and other potential contaminants that commonly occur during construction activities. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these materials would occur in accordance with Cal OSHA guidelines and would be disposed of in accordance with DTSC and County regulations. Based on compliance with regulatory requirements, potential impacts from use/storage of construction-related hazardous materials would be effectively avoided or addressed. Project construction would not create a significant hazard to the public or the environment.

The project's residential development would involve the limited use of household cleaning products, chemical pesticides, and fertilizers required to maintain proposed landscaping, and chemicals associated with maintenance of the swimming pool. Transport, use, and disposal of hazardous materials at the proposed residences would include minor amounts of such materials and would not be considered routine. The use, handling, and disposal of these products is addressed by household hazardous waste programs that are part of the Integrated Waste Management Plan (IWMP) of the County of San Diego. The Household Hazardous Waste Element of the IWMP specifies how hazardous wastes generated by households are to be collected, recycled, treated, and disposed of safely. Similarly, the church development may involve the limited use of cleaning products, chemical pesticides, and fertilizers, but regulated materials would be properly handled, used, stored, transported, and/or disposed of in accordance with applicable regulatory standards. Use of these common hazardous materials would not create a significant hazard to the public or the environment.

Level of Significance Prior to Mitigation

Project construction and operation would not create a significant hazard through the routine transport, use, and disposal of hazardous materials based on regulatory compliance with applicable federal, state, and local regulations. Impacts would be less than significant.

Mitigation Measures

No significant impacts related to routine transport, use, and disposal of hazardous materials would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to routine transport, use, and disposal of hazardous materials would remain less than significant.

4.7.5.2 Accidental Release of Hazardous Materials

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?

Impact Discussion

Hazardous materials releases can occur if there are existing hazardous materials at the project site that would be disturbed by project construction or operation, or if project operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions.

Accidental Spills/Release of Hazardous Materials

During project construction, there is a potential for accidental spills of fuels, lubricants, or various other liquids needed to operate heavy equipment on the project site. These materials include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets. Direct impacts to human health and biological resources from accidental spills of small amounts of hazardous materials from construction equipment during construction of the buildings could occur in case of accidental spill. As discussed above in Section 4.7.5.1, materials storage and construction staging would be managed by a project-specific SWPPP, which includes measures to avoid accidental spills and protocols to follow if that occurs. Additionally, existing federal, state, and local standards and regulations are in place for the handling, storage, and transport of these materials.

As discussed above in Section 4.7.5.1, the proposed residential and church developments would not involve handling substantial amounts of hazardous materials. Some common household hazardous substances would be used but not the type or quantity that would create a significant risk associated with accidental release. Use of hazardous materials would occur in compliance with applicable regulatory requirements. Based on regulatory compliance, project operation would not create a significant hazard to the public or environment through accidental release of hazardous materials.

On-site Soils

The project site was previously used for agriculture from at least 1939 through 1979. Due to past agricultural uses as groves, it is likely that pesticides and herbicides were applied. Such pesticides are COCs and can accumulate in near surface soils. Near surface soils have been disturbed due to grading activities across a large portion of the project site, however, the western and southern portions of the site remain undeveloped since the grove was removed. Near surface soils were evaluated to determine whether COCs

are present due to past agricultural use. The Phase II ESA was performed to assess the presence of OCPs and arsenic in shallow soil at the site and to assess the lateral and vertical extent of OCPs and arsenic identified in shallow soil at the site. Arsenic and three OCPs were detected in on-site soils, including dieldrin, alpha-chlordane, and gamma-chlordane.

OCPs and metals in soils are compared with screening levels (SLs) set forth by CalEPA's DTSC Human and Ecology Risk Office in Human Health Risk Assessment Note 3 (DTSC 2020). The SLs for residential soil are 0.034 mg/kg for dieldrin (an OCP) and 0.011 mg/kg for arsenic. The DTSC does not list a SL for alpha-Chlordane or gamma-Chlordane.

Based on the soil samples collected and analyzed during this investigation, the Phase II ESA concluded that the southeastern portion of the site has limited and low concentrations of dieldrin from past agricultural use that exceed applicable SLs for residential settings (maximum concentration of 0.069 mg/kg). Figure 4.7-1, *On-site Impacted Soils*, shows the location where on-site soils have been impacted by dieldrin exceeding the applicable SLs, which is limited to Grid E6. This is the only area of the site, including both the residential and church development sites, where dieldrin was detected above its applicable SL and dieldrin concentrations exceeding its SL do not extend to 1.5 feet bgs.

The maximum concentration of arsenic in the soil samples was 3.92 mg/kg, which exceeds the SL of 0.011 mg/kg. The USEPA and the DTSC have recognized that the SL for arsenic is commonly less than the concentrations which occur naturally in Southern California soils. The DTSC conducted an extensive study of naturally occurring arsenic concentrations in soils at school properties throughout Los Angeles County and determined that arsenic occurs naturally at concentrations of up to about 12 mg/kg in Southern California soils (DTSC 2008). Based on arsenic concentrations at the project site in comparison to the "Southern California Regional Background Arsenic Concentration in Soil", the Phase II ESA concluded that the arsenic levels in the soil samples collected are naturally occurring.

Hazardous Building Materials

The project includes demolition of the existing church that was constructed in the 1970s. Because of the age of the structures, it is likely that some building materials contain ACM and/or LBP. Such materials may pose a health and safety risk if they are disturbed and become airborne and inhalable during demolition. Thus, demolition activities could potentially release these hazardous building materials into the environment.

Level of Significance Prior to Mitigation

Adherence to applicable federal, state, and local regulations regarding the use and disposal of hazardous materials and wastes in the event of an accident would avoid potential impacts on human health and safety from handling and transport of hazardous materials. Near surface soils in the southeastern portion of the site contain residual concentrations of pesticides in excess of applicable SLs for residential uses. Additionally, the existing church building could potentially contain ACM and/or LBP. Therefore, impacts related to accidental release of hazardous materials would be potentially significant.

Mitigation Measures

HAZ-1 Soil Sampling, Removal, and Disposal. Prior to the issuance of a grading permit, the project applicant shall conduct near surface soil sampling and analysis in the southeastern portion of the site, limited to the area identified as Grid E6 on Figure 4.7-1, to define the limits of on-site soils



SAMPLE NUMBER	SAMPLE DEPTH	DIELDRIN (mg/kg)
E2-0.5	0.5	0.0108

SAMPLE NUMBER	SAMPLE DEPTH	DIELDRIN (mg/kg)
F2-0.5	0.5	0.0289

SAMPLE NUMBER	SAMPLE DEPTH	DIELDRIN (mg/kg)
F3-0.5	0.5	0.0152

SAMPLE NUMBER	SAMPLE DEPTH	DIELDRIN (mg/kg)
E6-0.5	0.5	**0.0399**
E6-1.5	1.5	0.0132

SAMPLE NUMBER	SAMPLE DEPTH	DIELDRIN (mg/kg)
E5-0.5	0.5	0.0224

LEGEND

- ○ A1 — ARSENIC AND PESTICIDE SAMPLE LOCATION (FREY, 2022)
- ● A2 — PESTICIDE SAMPLE LOCATION (FREY, 2022)
- ● — SOIL BORING LOCATION (FREY, 2023)
- ▭ — ESTIMATED AREA OF DIELDRIN IMPACTED SOILS

NOTES:

1. All locations and dimensions are approximate.
2. Site Sketch from Google Earth Aerial Photo.

0 200 400

APPROXIMATE SCALE IN FEET

Source: Frey Environmental, Inc 2023

I:\PROJECTS\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Fig4.7-1_ImpactedSoils.indd 00876.00006.001 07/18/23 -RK

HELIX Environmental Planning

On-site Impacted Soils

Figure 4.7-1

impacted by dieldrin. A soil sampling and removal report that delineates the limits of impacted soils and identifies recommendations regarding excavation, removal, and disposal of impacted soils shall be prepared and submitted for approval to the City's Development Services Department. The soil sampling and removal report shall also be submitted to the County Department of Environmental Health and Quality (DEHQ) for review through the Voluntary Assistance Program (VAP). The DEHQ may refer the project to the Department of Toxic Substances Control (DTSC) or the Regional Water Quality Control Board (RWQCB) for oversight. The project shall implement the remediation requirements established by the DEHQ, DTSC, or RWQCB until a "No Further Action" letter or "Concurrence" letter is issued to indicate the completion of all remediation activities. The site-specific recommendations identified in the soil sampling and removal report and confirmed by the DEHQ, DTSC, or RWQCB shall be implemented by the construction contractor during grading activities, and impacted soils shall be disposed of at an appropriate disposal facility. Following completion of grading activities and soil removal and disposal, the project applicant shall provide a letter to the City's Development Services Department documenting that impacted soils were removed and disposed of in accordance with the recommendations in the soil sampling and removal report and at a disposal facility permitted to receive the impacted soils. The "No Further Action" or "Concurrence" letter from the overseeing entity shall also be provided to the City's Development Services Department to confirm that the project has completed review through the DEHQ VAP.

HAZ-2 Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal. Prior to issuance of a demolition or grading permit, an asbestos and lead survey shall be conducted on the project site by a licensed asbestos/lead contractor. If the survey identifies hazardous building materials, the project applicant shall complete the necessary remediation identified in the survey prior to commencement of demolition activities in accordance with applicable laws, including Occupational Safety and Health Administration (OSHA) guidelines, to ensure that no hazards to the demolition crew, adjacent residents, or others are created by exposure to hazardous building materials. The project applicant shall provide a letter to the City's Development Services Department stating that a licensed asbestos/lead contractor has been retained at the project applicant's expense to conduct the asbestos and lead survey, and a letter report summarizing the conclusions and recommendations of the asbestos and lead survey shall be prepared and submitted to the City's Development Services Department.

Level of Significance After Mitigation

With implementation of mitigation measures HAZ-1 and HAZ-2, impacts related to accidental release of hazardous materials would be less than significant.

4.7.5.3 Hazardous Emissions Near Schools

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?

Impact Discussion

There are two schools located within 0.25 mile of the project site, including:

- Miller Elementary School located at 1975 Miller Avenue, approximately 360 feet (0.07 mile) to the north; and
- Felicita Montessori Preschool, located at 2017 Felicita Road, approximately 300 feet (0.06 mile) to the northwest.

The proposed project would involve the temporary use and/or storage of fuels, oils, and other potential hazardous materials during construction, and the limited use/storage of household cleaning products, landscaping pesticides, and pool chemicals during operation. The project's use of hazardous materials during construction would be handled in accordance with NPDES SWPPP requirements, as well as compliance with applicable federal, state, and local regulations associated with hazardous materials. Adherence to these applicable regulations would avoid exposure to construction-related and common residential hazardous materials from occurring to nearby schools.

As discussed in Section 4.7.5.2, however, the southeastern portion of the site contains soils contaminated with pesticide concentrations and the existing church that would be demolished could potentially contain ACM and/or LBP. If present, people at nearby schools could potentially be exposed to emissions of these hazardous materials during construction activities.

Level of Significance Prior to Mitigation

The proposed project could potentially emit hazardous emissions associated with contaminated soil, ACM, and LBP within one-quarter mile of two schools. Impacts would be potentially significant.

Mitigation Measures

See HAZ-1 and HAZ-2 identified in Section 4.7.5.2.

Level of Significance After Mitigation

With implementation of mitigation measures HAZ-1 and HAZ-2, impacts related to accidental release of hazardous materials would be less than significant.

4.7.5.4 Listed Hazardous Materials Sites

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

Impact Discussion

As part of the Phase I ESA prepared for the proposed project (FREY Environmental Inc. 2022), various federal, state, and local regulatory databases were searched for information regarding properties with known or suspected releases of hazardous materials, chemical handlers, and/or polluters. The project site

is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5.

A total of 37 listed off-site facilities were identified in various databases within the search radius. These include one State and Tribal superfund equivalent site, nine State and Tribal hazardous waste facilities, three leaking storage tank sites, one voluntary cleanup site, 22 other recorded sites, and one orphaned listing. Details on these off-site listed facilities are provided in Section 4.7.1.4. The Phase 1 ESA concluded that none of these off-site listed facilities represent an REC for the project site.

Level of Significance Prior to Mitigation

The project is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and listed off-site facilities in the project vicinity would not pose RECs for the project. Therefore, the project would not create a significant hazard to the public or environment. Impacts would be less than significant.

Mitigation Measures

No significant impacts related to listed hazardous materials sites would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to listed hazardous materials sites would remain less than significant.

4.7.5.5 Airport Hazards

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

Impact Discussion

The closest airports to the project site are Ramona Airport, located approximately 10 miles to the southeast, and McClellan-Palomar Airport, located approximately 12 miles to the west. The project site is not located within the AIA or safety zones of either of these airports and thus, would not be subject to safety hazards associated with airport operations.

Level of Significance Prior to Mitigation

The project is not located within an AIA or safety zone of an airport. No impacts related to airport hazards would occur.

Mitigation Measures

No impacts related to airport hazards would result from implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. No impacts related to airport hazards would occur.

4.7.5.6 Emergency Response and Evacuation Plans

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

Impact Discussion

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state, and local levels for all types of manmade and natural disasters. Potential hazards or events that may trigger an emergency response action include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms, and freezes. Emergency response actions could also be triggered from a hazardous material incident; water or air pollution, major transportation incident; water, gas, or energy shortage; epidemic; nuclear accident; or terrorism.

To address disasters and emergency situations at the local level, the Unified Disaster Council is the governing body of the Unified San Diego County Emergency Services Organization. The Council is chaired by a member of the San Diego County Board of Supervisors and comprises representatives from the 18 incorporated cities in San Diego County, including Escondido. The Escondido Fire Department is the City's lead agency responding to natural disasters such as earthquakes, floods, and storms, and for other emergencies related to fire, explosion, hazardous materials, rescue, and medical problems. Additionally, Escondido is included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, which was developed to serve as both a county-wide plan and a plan for local jurisdictions to identify risks posed by natural and human-caused disasters before a hazardous event occurs.

In the event of an emergency, designated evacuation routes near the proposed project are I-15, Felicita Avenue, and Centre City Parkway (City 2012a). During the construction period, roadway users, including emergency vehicles, may experience temporary delays on roadways surrounding the project site as a result of deliveries and the hauling of construction materials. However, such delays would be infrequent, brief, and temporary. Construction staging would occur within the boundaries of the project site. Temporary lane closures along Felicia Road and Brotherton Road necessary to construct the proposed sidewalk alterations and utility connections would be subject to City approval of a traffic control plan to maintain roadway safety and accessibility for emergency vehicles. Therefore, emergency access along designated evacuation routes, while potentially altered at times, would remain available throughout the project construction period.

The residential development has been designed with two driveways, one on Brotherton Road and one on Felicita Road. The church development has been designed with two driveways on Brotherton Road. The driveways would be 24 feet wide, which would be wide enough to accommodate emergency vehicle access. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles such that Felicita Road would not be obstructed for public safety vehicle movement as well as local traffic in the event of an emergency.

Level of Significance Prior to Mitigation

The proposed project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

No significant impact related to emergency response or emergency evacuation plans would result from implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. The impact related to emergency response plans would be less than significant.

4.7.5.7 Wildland Fires

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

Impact Discussion

The project site and surrounding area are not located within a VHFHSZ as designated by CalFire. According to the City of Escondido General Plan's Community Protection element, the project site and surroundings are located in a High Fire Hazard Zone. However, the project would not increase the potential for wildfires in the project area, as the site and vicinity are developed and not adjacent to wildlands. The new buildings and other proposed site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. Additionally, the project applicant would be required to pay a development impact fee per dwelling unit, which would ensure fire response times are adequately met throughout the City. Refer to Section 6.8 in the EIR for additional discussion of wildfire.

Level of Significance Prior to Mitigation

The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts related to wildland fires would be less than significant.

Mitigation Measures

No significant impacts related to wildland fires would result from implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to wildfires would remain less than significant.

4.8 Land Use and Planning

This section of the EIR describes the existing setting of the project site within the context of land use plans, identifies applicable plans and policies related to land use, and evaluates potential impacts to land use and planning associated with implementation of the project.

4.8.1 Existing Conditions

4.8.1.1 Project Site Setting and Land Uses

The proposed project site is located at 855 Brotherton Road in the southern portion of the City of Escondido and includes two parcels (APN 236-333-41-00 and APN 236-333-53-00) that encompass a total of 14.83 acres. The site is located southeast of the intersection of Brotherton Road and Felicita Avenue. The project site is developed with a church building, two private school education buildings, playgrounds, a basketball court, and surface parking on an elevated building pad. The project site also contains a drainage swale, dirt/vegetated fields, and utility infrastructure. Access to the project site is currently provided via one driveway along Brotherton Road. Refer to Figure 2-3.

Existing vegetation communities and land cover types on the project site include urban/developed, disturbed habitat, non-native grassland, emergent wetland, and ornamental landscape (Michael Baker International 2023). Elevations on the project site range from approximately 600 to 670 feet AMSL, sloping slightly downwards to the west and southwest. The existing church building, education buildings, and surrounding parking area are located on an elevated building pad while the western drainage swale and fields surrounding the church and education buildings to the east, south, and west are lower in elevation.

The project site is within the boundaries of the City of Escondido and, as such, is under the jurisdiction of the Escondido General Plan, which currently designates the land use for the project site as Planned Office (PO). The PO land use category is intended to accommodate a variety of office uses within campus-like settings (City 2012a). In addition, the project is subject to the City's Zoning Ordinance codified in Chapter 33 of the Escondido Municipal Code. The project site is presently zoned Residential Estates (R-E). This zone is intended to provide for single-family dwellings in a rural setting and allows detached single-family dwellings, limited agricultural pursuits, mobile homes, and small day care centers, with a minimum lot size of 20,000 SF.

4.8.1.2 Surrounding Setting and Land Uses

Land uses surrounding the project site generally include single-family residences, schools, and agricultural uses. General Plan land use designations for the properties surrounding the project site are PO to the north and south; Suburban to the east and northeast; and Estate II to the west. The Suburban land use category is intended to accommodate single-family residences near the urban core of the City. The Estate II land use category similarly accommodates single-family residences but with slightly larger lot sizes. In the case of the property northeast of the project site, the Suburban-designated property is developed with Miller Elementary School. The residences south and north of the project site are legal non-conforming uses for the PO land use category within the General Plan.

The properties surrounding the project site to the northwest, south, east, and west are zoned R-E. The parcels northeast of the project site are zoned Single-family Residential (R-1) with a minimum lot size of 10,000 SF, which is a zone for single-family dwellings in a suburban setting.

4.8.1.3 Citywide Land Uses and Growth

Development within the City is generally concentrated within the valley floor where the City's urbanized core surrounds the downtown area. The urban core and downtown encompass a variety of land uses, including single- and multi-family neighborhoods as well as industrial and commercial developments. The City's primary employment hub is located in the western portion of the City paralleling SR 78. Large areas of open space are available around the perimeter of the City and offer recreational opportunities.

As of the publication of the City's latest General Plan in 2012, residential land uses represented the dominant land use, occupying 36,145 acres and 71 percent of the General Plan area. As of the 2021 update to the Housing Element of the General Plan (City 2023), it was estimated that of the City's approximately 49,211 housing units, 57.6 percent are single-family homes, 35.6 percent are multi-family homes, and the remaining 7.7 percent are mobile homes (percentages do not sum to 100 due to rounding).

According to the U.S. Census Bureau, the City's population was 143,911 in 2010 and grew to 151,038 as of 2020, an increase of approximately 5.0 percent. During the same period, the population within the County increased by approximately 6.6 percent. The City's population as a proportion of the County's total population has remained approximately 4.6 percent from 2010 to 2020 (U.S. Census Bureau 2022).

4.8.2 Regulatory Framework

4.8.2.1 State Regulations

California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law (Government Code Sections 65000 through 66499.58). Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code: land use, circulation, housing, conservation, open space, noise, and safety. Other elements may be added at the discretion of individual jurisdictions when preparing their General Plan. Each of the elements sets forth objectives, principles, standards, policies, and plan proposals related to the element's topic.

Natural Community Conservation Planning Act of 1991

As described further in Section 4.3.2.2, the Natural Community Conservation Planning Act is designed to conserve natural communities at the ecosystem scale through implementation of long-term habitat conservation plans.

Senate Bill 375

As described further in Section 4.6.2.2, SB 375 requires coordination of land use planning, regional transportation plans, and funding priorities to reduce GHG emissions from passenger vehicle travel within each Metropolitan Planning Organization (MPO) planning area. As it pertains to land use planning, each MPO must create a Sustainable Community Strategy (SCS) to achieve its regional GHG emissions reduction goal through the development of more compact, complete, and efficient communities. For the project area, the SANDAG 2025 Regional Plan achieves the requirements of SB 375.

California Density Bonus Law

Originally enacted in 1979, California's Density Bonus Law (Government Code Sections 65915 through 65918) allows a developer to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan. In exchange for the increased density, a certain number of the new affordable dwelling units must be reserved at below market rate. Qualifying applicants can also receive reductions in required development standards. Greater benefits are available for projects that reach higher percentages of affordability. Besides granting rights to housing and mixed-used developments to increase density, the law provides three provisions that require local governments to grant qualifying projects: (1) incentives (or concessions) that provide cost reductions; (2) waivers of development standards that would physically preclude the development of a project at the density permitted and with the incentives granted; and (3) reductions in parking requirements. The applicant proposes to utilize the Density Bonus Law.

4.8.2.2 Local Regulations

The City has numerous policies, programs, codes, and ordinances that regulate land use development. The following sections focus on the plans and policies that affect land use designations and zoning, especially as they relate to the proposed project. Policies and regulations that indirectly affect land use planning are described in further details in the other sections of Chapter 4, *Environmental Analysis*, of this EIR.

2025 Regional Plan

The 2025 Regional Plan is SANDAG's long-range planning document developed to address housing, economic, transportation, environmental, and overall quality-of-life needs for the San Diego region. As described further in Sections 2.4.1 and 4.6.2.3, the 2025 Regional Plan achieves the SB 375 requirements for the region and provides guidance for regional growth and land use planning. The strategies from the 2025 Regional Plan guide new development to be located in proximity to jobs and amenities with access to the regional transportation network. Implementation of the Regional Plan would achieve GHG reductions as a result of new transportation technologies, smart growth, and land use planning.

North County Multiple Habitat Conservation Program

The MHCP addresses conservation planning in accordance with the Natural Community Conservation Planning Act and is intended to provide a preserve network for sensitive species and habitats in the region while allowing land use development. However, the City of Escondido has not adopted a Subarea Plan to implement the MHCP within the City. The draft Escondido MHCP Subarea Plan provides a framework for conservation planning and a potential preserve system but has not been adopted and is therefore not applicable to land use planning in the City. However, adverse effects to federal/state protected species would be subject to incidental take permits upon coordination with the USFWS and CDFW. Additional information related to the MHCP is provided in Section 4.3, *Biological Resources*.

City of Escondido General Plan

In accordance with California Government Code Section 65300, the City has prepared the General Plan as a long-range public policy to guide the use of private and public lands within the City. The plan is both general and comprehensive in that it provides broad guidelines for development in the City while addressing a wide range of issues that will affect the City's desirability as a place to live, work, and play. The elements of the Escondido General Plan include Land Use and Community Form, Mobility and

Infrastructure, Housing, Community Health and Services, Community Protection, Resource Conservation, Growth Management, Economic Prosperity, and Implementation. With the exception of the Housing Element, which was amended in March 2023 to address the years 2021 to 2029, the General Plan Elements were adopted in May 2012 and represent a planning horizon year of 2035 (City 2012a).

As previously stated, the project site is currently designated as PO in the General Plan Land Use and Community Form Element. The PO land use designation is intended to accommodate campus-like office uses for multiple businesses with a coordinated design. Accessory retail uses may be incorporated into these uses to serve the larger office facility. The applicant proposes a General Plan Amendment to change the existing land use designation from PO to Urban V. The Urban V designation is intended to accommodate higher density, urban multi-family housing in areas that provide convenient access to a wider range of facilities and services. The following information regarding the Urban V land use designation is excerpted from the General Plan Land Use and Community Form Element:

- General Description of Uses: Higher density multi-family residential units, townhomes and apartments, flats, and condominiums. This designation is appropriate near the downtown core, transit stations, along major thoroughfares in close proximity to shopping centers, entertainment, community facilities, and employment opportunities to provide residents the opportunity to live near work and amenities.
- Maximum densities allowed: 30 dwelling units per acre (du/ac)
- Minimum densities allowed: 21 du/ac
- Building Height: 2-4 stories
- Street designs support pedestrian and bicycle use along with vehicular circulation
- Zoning: R-5-30

In addition to the General Plan goals and policies, the City's General Plan includes Quality of Life Standards that establish minimum thresholds of service levels for various public improvements and facilities. The City's Quality of Life Standards (City 2012a) are identified below:

- **Quality of Life Standard 1: Traffic and Transportation.** Circulation Element streets and intersections shall be planned and developed to achieve a minimum level of service (LOS) "C." LOS "D" shall be considered the threshold for determining significant impacts and appropriate mitigation. Where existing street or intersection capacities are below LOS "C," street, operational or Transportation System Management improvements shall be required or planned to improve the service level to "C" whenever feasible based upon impacts of future development.

- **Quality of Life Standard 2: Public Schools.** The community shall have sufficient classroom space to meet state-mandated space requirements and teacher/student ratios, with student attendance calculated on prescribed state and/or local school board standards.

- **Quality of Life Standard 3: Fire Service.** In urbanized areas of the City, an initial response time of 7.5 minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of 10 minutes for supporting companies shall be maintained. A minimum of seven total fire stations, each staffed with a PAU engine company, shall be in place prior to General Plan build-out. For outlying areas beyond a five-minute travel time or further than

three miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief.

- **Quality of Life Standard 4: Police Service.** The City shall maintain personnel staffing levels based on community-generated workloads and officer availability. Resources will be adjusted to maintain an initial response time for Priority 1 calls (crimes in progress or life threatening) of no more than 5 minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life-threatening incidents) of no more than 6.5 minutes.

- **Quality of Life Standard 5: Wastewater System.** The City wastewater system shall have adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs. Capacity to treat a minimum of 250 gallons per day for each residence on said system or as established in the City's Wastewater Master Plan shall be provided.

- **Quality of Life Standard 6: Parks System.** The City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units. Prior to build-out, the City shall provide a minimum of two community centers. Other specialized recreation facilities shall be incorporated into the City's Master Plan for Parks, Trails, and Open Space.

- **Quality of Life Standard 7: Library Service.** The public library system shall maintain a stock and staffing of two collection items per capita and three public library staff per 8,000 residents of the City of Escondido. The City shall provide appropriate library facilities with a minimum of 1.6 sf of library facility floor area per dwelling unit of the City prior to buildout of the General Plan where feasible.

- **Quality of Life Standard 8: Open Space System.** A system of open space corridors, easements, acquisition programs and trails shall be established in the Resource Conservation Element. Sensitive lands including permanent bodies of water, floodways, wetlands, riparian and woodland areas, and slopes over 35 percent inclination shall be preserved. Significant habitat for rare or endangered species shall be protected in coordination with state and/or federal agencies having jurisdiction over such areas.

- **Quality of Life Standard 9: Air Quality.** The City shall establish a CAP with feasible and appropriate local policies and measures aimed at reducing regional GHG emissions.

- **Quality of Life Standard 10: Water System.** The City shall maintain provisions for an adequate water supply, pipeline capacity, and storage capacity to meet normal and emergency situations and shall have the capacity to provide a minimum of 540 gallons per day per household or as established by the City's Water Master Plan. Federal and state drinking water quality standards shall be maintained. The City shall continue efforts to implement water reclamation and water conservation programs.

- **Quality of Life Standard 11: Economic Prosperity.** The City shall implement programs and support efforts to increase Escondido's median household income and per capita wage.

Zoning Ordinance

The City's Zoning Ordinance, provided in Chapter 33 of the Municipal Code, is the primary way that the City administers the General Plan. The General Plan identifies general land use designations, while the Zoning Ordinance identifies specific uses and development standards within these land use designations. The purpose of the Zoning Ordinance is to serve the public health, safety, comfort, convenience, and general welfare by:

A. Regulating the use of buildings, structures, and land uses as between agriculture, industry, business, residence, and other purposes;

B. Regulating signs and billboards; Regulating the location, height, bulk, number of stories and size of buildings and structures; the size and use of lots, yards, courts, and other open spaces; the percentage of a lot that may be occupied by a building or structure; and the intensity of land use;

C. Establishing requirements for off-street parking and loading;

D. Establishing and maintaining building setback lines;

E. Creation of civic districts around civic centers, public parks, public buildings or public grounds, and establishing related regulations;

F. Establishment of general provisions and standards of development with the aim of preserving a wholesome, serviceable, and attractive community; and

G. Establishing standards for landscaping and irrigation for commercial, industrial, and residential development.

The Zoning Ordinance establishes development regulations for specific land uses, identified by zones, as well as overlay areas established in the General Plan, such as open space and floodplain areas. Additionally, some portions of the Municipal Code apply to all areas of the City, regardless of zone, such as Article 55, *Grading and Erosion Control*. Zoning Ordinance sections that pertain to specific environmental issues such as aesthetics, air quality, geology and soils, and hydrology and water quality are addressed in other sections of this EIR. Zoning Ordinance sections related to the land use development process for the project are listed below.

Article 6: Residential Zones

The City's Zoning Ordinance identifies the proposed project site as R-E with a minimum lot size of 20,000 SF. This zone is intended to provide for single-family dwellings in a rural setting. Permitted uses include detached single-family dwellings, mobile homes alone on the parcel, and small day care centers.

The applicant proposes to change the zoning of the site to Very High Multi-Family Residential (R-5-30), which is a zone established to provide a multi-family setting for family life in higher-height, very high-density dwelling units in close proximity to other multi-family neighborhoods and near the City's center. Permitted uses within the R-5-30 zone include single-family residences, multi-family residences, transitional or supportive housing, senior housing, and residential care facilities. Limited recreational and institutional uses may also occur within the R-5-30 zone with permit approval.

A minimum lot size of 6,000 SF and minimum public street lot frontage of 35 feet apply to the R-5-30 zone, and buildings are generally not allowed to exceed 75 feet and 4 stories in height. Minimum setbacks within the R-5-30 zone are 15 feet at the lot front, 10 feet at a street side, 5 feet at an interior side, and 10 feet at the rear, except where buildings over two stories are proposed. Population density is generally restricted to 30 dwelling units per acre in the R-5-30 zone; however, increased density is allowed under the State Density Bonus Law, as described below. The maximum floor-to-area ratio is 0.9 and the minimum usable open space is 200 SF per dwelling unit plus 200 SF per additional bedroom for the R-5-30 zone.

Article 47: Environmental Quality

Article 47 of the Zoning Ordinance implements the requirements of CEQA by applying the provisions and procedures contained in CEQA to development projects proposed within the City. This article of the Zoning Ordinance lists the criteria that would exempt a project from CEQA, establishes mitigation and reporting requirements, and establishes criteria that coordinate CEQA requirements with the City's quality of life standards to clarify how impacts identified for a project would affect its CEQA significance determinations. These criteria include air quality screening level thresholds for criteria pollutants, traffic level of service standards, and limits on allowable noise increases for projects where a negative declaration would be appropriate except for the occurrence of a quality of life standard deficiency. Where used to determine the significance of impacts related to the project, the specific screening thresholds are provided in the applicable sections of this EIR.

Article 64: Design Review

Article 64 of the Zoning Ordinance requires design review of new development and modifications to existing development in order to preserve the natural charm, integrity, and quality of the built environment in the City. This article also ensures that development is consistent with or exceeds the high quality of existing development in the City. Project applications subject to design review are reviewed by City Planning Division staff or at a regularly scheduled Planning Commission meeting at which the applicant is present. For discretionary projects which require public hearing, City Planning Division staff submit recommendations to the Planning Commission and/or City Council, which then consider the report in making its decision. The elements of design consideration include site development, circulation, grading, setbacks, exterior appearance of buildings, structures, signs, lighting, street furniture, landscaping, and other outdoor appurtenances.

Article 67: Density Bonus and Residential Incentives

Article 67 of the Zoning Ordinance specifies how the City will implement the State Density Bonus Law, which allows developers to increase density above the standard maximum for the zone and provides other development incentives when income restricted housing units are proposed. The allowable increase in density to be granted is based on the percentage of a project's units that are affordable and the level of household income for which those units are reserved. In addition, a number of incentives or concessions are granted to a developer for modifications to development regulations that allow for the development of the proposed affordable housing units. The project would allocate five percent, or 13, of the proposed residential units to be restricted to very low income residents, which would allow for a density increase from a maximum of 30 du/ac per the proposed R-5-30 zone to 32.6 du/ac. Additionally, the project is requesting a concession for the projection into the front setback and waivers for the open space and storage requirements.

4.8.3 Thresholds of Significance

Thresholds used to evaluate potential impacts related to land use and planning are based on applicable criteria in CEQA Guidelines Appendix G. A significant impact related to land use and planning could occur if implementation of the proposed project would:

a. Physically divide an established community; or

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.

4.8.4 Methodology and Assumptions

The analysis of impacts related to land use and planning consists of a summary of the regulatory framework that guides the decision-making process related to land use and consideration of whether the proposed project would conflict with existing regulations intended to avoid environmental impacts or would inhibit the implementation of land use plans adopted to reduce environmental effects.

4.8.5 Project Impact Analysis

4.8.5.1 Community Division

Would the project physically divide an established community?

Impact Discussion

A project would typically result in impacts related to the physical division of a community if new or expanded linear features were constructed and would traverse an established community. The project site is currently developed and bounded by existing development on all sides, including Brotherton Road on the north, Felicita Road on the west, and single-family residences on the east and south. The project proposes residential and church uses within portions of developed parcels in an area that is developed with a mixture of uses. Off-site improvements associated with the project would occur within developed roadways and would include widening of Felicita Road and new sidewalks. These improvements would occur along the project frontage and would not disrupt surrounding land uses or represent new linear features within an established community. Rather, the installation of sidewalks along Felicita Road would improve pedestrian connectivity in the project area. Therefore, the project would not physically divide an established community.

Level of Significance Prior to Mitigation

The project would not physically divide an established community and no impact would occur.

Mitigation Measures

No significant impacts related to the division of established communities would result from implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. No impacts related to community division would occur.

4.8.5.2 Land Use Plans, Policies, and Regulations

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 impact?

Impact Discussion

Plans, policies, and regulations considered in this analysis include the Escondido General Plan and Escondido Zoning Ordinance. The project's conformance with plans, policies, and regulations related to other environmental issue areas, such as the Attainment Plan/RAQS, MHCP, CAP, and Regional Plan, is summarized briefly under "Other Plans" below and described further in the applicable chapters of this EIR.

Escondido General Plan

The project site is designated as PO in the General Plan Land Use and Community Form Element and the applicant proposes a General Plan Amendment to redesignate the land use of the entire site as Urban V. The PO designation allows a FAR of up to 2.0, which would allow for up to approximately 1,291,995 SF of office floor space on the project site. The Urban V land use designation allows a residential density of 30 du/ac, which would allow up to 238 dwelling units to be constructed on the 7.92-acre residential site. The project would provide 13 affordable housing units (five percent of very low income) and utilize a density bonus as allowed by the California Density Bonus Law to increase the allowable density on the site from 30 du/ac to 32.6 du/ac. The final density for the project would be 32.6 du/ac. The proposed GPA and rezone along with application of the density bonus would allow for the development of the proposed project. The project includes 258 multi-family residential units and common and private open space on the 7.92-acre residential site in a developed area of the City with existing residential and other uses. Therefore, the change in land use designation for the site in the General Plan would not result in a significant environmental impact. After approval of the proposed General Plan Amendment, rezone, density bonus, and CUP, the project would be consistent with the Escondido General Plan. Furthermore, as described throughout Table 4.8-1, *General Plan Policy Consistency Analysis,* the project would be consistent with applicable policies of the Escondido General Plan related to avoiding or mitigating environmental impacts.

The General Plan Community Protection Element includes noise and land use compatibility standards to ensure that proposed land uses are not exposed to excessive noise. Noise Policy 5.2 states that outdoor activity areas within multi-family residential developments should achieve noise levels of 65 Community Noise Equivalent Level (CNEL) where feasible; however, where this standard is not achievable, residential construction may still proceed given feasible mitigation is installed and interior areas comply with Title 24 requirements. For school and church uses, the Community Protection Element indicates exterior noise levels of up to 65 CNEL are "normally acceptable" and noise levels between 60 and 70 CNEL are "conditionally acceptable."

Outdoor use areas proposed by the residential development include a pool and amenity area at the center of the residential buildings. Outdoor use areas proposed by the church development include a sport field and basketball court along the southern edge of the church development area and a play area at the

southern edge of the school building. The Noise Technical Report prepared for the project (HELIX 2025) included modeling of the exterior environment with existing plus project and I-15 traffic volumes (refer to Section 4.9, *Noise*, for additional information related to the noise analysis methodology). Noise levels at the pool and amenity area associated with the residential development were modeled to be 44.1 CNEL. As this noise level would not exceed 65 CNEL, the residential development would comply with the General Plan policy for allowable noise in outdoor use areas for new residential developments.

Within the church development, noise levels at the lawn and basketball court were modeled to be 67.3 CNEL and 67.9 CNEL, respectively. Noise levels at the play area south of the school building were modeled to be 66.8 CNEL. These noise levels are within the conditionally compatible range of noise levels for church and school land uses. As these areas would be used for recreational purposes, no further attenuation is required. The church development would comply with the General Plan compatibility standards for allowable noise in outdoor use areas for new church developments.

In addition, General Plan standards and Title 24 regulations require that noise levels in habitable interior spaces for multi-family residential uses do not exceed 45 CNEL. General Plan Noise Policy 5.4 also requires noise attenuation for new noise-sensitive uses, including residences, schools, and churches, if the projected interior noise standard of 45 dBA CNEL is exceeded. Traditional architectural materials are conservatively estimated to attenuate noise levels by 15 CNEL; therefore, if exterior noise levels at building façades exceed 60 CNEL, interior noise levels may exceed the 45 CNEL limit.

Residential building façades with a direct line of sight to Felicita Road, Miller Avenue, and I-15 (east, south, and west facing building facades) would be exposed to noise levels above 60 CNEL. Therefore, interior noise levels may exceed the interior noise limit of 45 CNEL with the use of typical construction materials, which would exceed the General Plan standard for interior spaces. Additional analysis would be required to confirm that the building materials achieve interior noise levels that are compatible with the General Plan Community Protection Element noise standards.

Noise levels at the church building were estimated to be 66.2 CNEL at the southern façade facing I-15, 61.1 CNEL at the eastern façade facing Miller Avenue, and 48.1 at the northern façade facing Brotherton Road. Noise levels at the church missionary residential unit façades were estimated to be 55.6 CNEL on the north, 66.6 CNEL on the south, 60.2 CNEL on the east, and 64.6 CNEL. These noise levels are within the conditionally compatible range for new church and residential land uses. The General Plan Community Protection Element requires an analysis of noise reduction requirements in this case but notes that conventional construction, with closed windows and fresh air supply systems or air conditioning, will usually suffice to attenuate interior noise. Nonetheless, interior noise levels may exceed the interior noise limit of 45 CNEL and additional analysis would be required to confirm that the final building materials achieve interior noise levels that are compatible with the General Plan Community Protection Element noise standards.

Zoning Ordinance

As identified above, the project site is currently zoned R-E with a minimum lot size of 20,000 SF. The applicant proposes rezoning the entire site to R-5-30, which is a zone consistent with the Urban V General Plan land use designation and allows residential density up to 30 du/ac. With approval of the zone change, the project would be subject to the requirements of the R-5-30 zone described in Section 4.8.2.2. Modifications to the CUP would bring the church site into compliance with the R-5-30 zone. In addition, the project would continue to be required to adhere to other regulations in the Zoning Ordinance

pertaining to all development, such as Article 55, *Grading and Erosion Control*, Article 64, *Design Review,* and Article 61 *Plot Plan*. The project would comply with requirements of the R-5-30 zone, except where concessions or waivers have been requested in accordance with Zoning Ordinance Article 67 to accommodate the provision of affordable housing units as allowed by the California Density Bonus Law. Specifically, the project is requesting a concession for the projection into the front setback and waivers for the open space and storage requirements. The proposed rezone and associated GPA, along with application of the density bonus, would allow for the development of the proposed project.

Other Plans

Land use plans and policies contained in the Attainment Plan/RAQS, MHCP, CAP, and Regional Plan are also applicable to the project. The project's consistency with these plans is addressed further in the relevant sections of this EIR. The project would result in less pollutant emissions than the planned PO land use considered in the Attainment Plan and RAQS and, as such, would not obstruct implementation of these air quality plans (refer to Section 4.2.5.1). As discussed in Section 4.3, *Biological Resources*, the draft Escondido MHCP Subarea Plan has not been adopted but the project includes habitat mitigation (mitigation measure BIO-2) consistent with the mitigation ratios provided in the draft plan and would not prevent future implementation of the MHCP. The project would decrease GHG emissions from those anticipated under buildout of the PO land use and would conform with CAP policies identified in the CAP Checklist through project design features (refer to Sections 3.6 and 4.6.5). Finally, as discussed in Section 4.11.5.1, the project would be consistent with the Regional Plan given the proposed implementation of active transportation facilities at the project site. Therefore, the project would not conflict with the Attainment Plan/RAQS, MHCP, CAP, or Regional Plan, which are adopted for the purposes of avoiding or mitigation environmental effects.

Level of Significance Prior to Mitigation

The project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. Impacts would be less than significant.

Mitigation Measures

No significant impacts related to land use plan conflicts would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to land use plan conflicts would remain less than significant.

Table 4.8-1
GENERAL PLAN POLICY CONSISTENCY ANALYSIS

Policy Number	Policy Text	Consistency Analysis
Chapter II	***Land Use and Community Form Element***	
Community Character Policy 1.6	Residential Categories are established for purposes of providing the City with a range of building intensities to address various site constraints and opportunities. Proposed development shall not exceed the densities shown on the Land Use Plan and outlined in Figure II-6.	**Consistent**. The applicant proposes a density of 32.6 du/ac where 30 du/ac is typically allowed based on the provision of affordable housing in accordance with the State Density Bonus Law. The project would provide a high-density housing development on a site along a major roadway and close to the I-15 freeway, improving the range of residential building intensities in the City.
Community Character Policy 1.8	Require development projects to locate and design buildings, construct energy and water efficient infrastructure, reduce GHG emissions, enhance community livability and economic vitality, and implement other practices contributing to sustainable resources.	**Consistent**. Both the residential and church development portions of the project would be constructed in accordance with current building codes requiring water-efficient appliances and landscaping and would meet Title 24 regulations related to energy efficiency. The project would also comply with the applicable CAP measures to reduce GHG emissions and would provide resident amenities enhancing the livability of the site.
Community Character Policy 1.10	Reduce light pollution and preserve views of the night sky through the design and siting of light fixtures to minimize light spill-over onto adjacent properties.	**Consistent**. Consistent with Article 35 of the zoning ordinance (Chapter 33 of the Escondido Municipal Code), all exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded so that nighttime lighting is reduced at adjacent properties.
Community Character Policy 1.11	Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).	**Consistent**. The residential site building materials would include plaster exterior walls with stone and wood accents and terra cotta tile roofs, which are not sources of glare. Glass, which can be a source of glare, would be limited to windows typical of residential construction. The church site would include earth-toned stucco, gray metal paneling, wood-colored ceramic tile walls, stone steeple and entry columns, and dark bronze aluminum window frames. None of these materials would produce significant glare.

Policy Number	Policy Text	Consistency Analysis
Residential Development Policy 3.4	Require that properties in Urban III, IV, and V residential designations be developed at a minimum 70 percent of their permitted densities in order to promote transit ridership and walking, support nearby commercial establishments and take advantage of infrastructure improvements sized to accommodate their intended intensities.	**Consistent**. The applicant proposes a General Plan Amendment to change the land use designation of the site to Urban V. The Urban V land use designation allows a residential density of up to 30 du/ac. Based on the 7.92-acre residential site, up to 238 dwelling units could be constructed, and 70 percent of the allowable density would be 166 dwelling units for the site. The applicant proposes 258 dwelling units on the residential site (utilizing a density bonus for the provision of affordable housing allowed by the State Density Bonus law to exceed the allowable density), which exceeds the minimum 70 percent per this policy. The project would also construct or contribute its fair share to infrastructure improvements required to accommodate the proposed density.
Neighborhood Maintenance & Preservation Policy 4.3	Integrate pedestrian-friendly features, promote walkability, and work with residents to enhance existing neighborhood character and aesthetics.	**Consistent**. The project would construct pedestrian features enhancing the neighborhood and promoting walkability. A sidewalk would be constructed on the east side of Felicita Road along the project frontage and curb ramps would be installed at the corners of the Felicita Road intersections with Brotherton Road and Palm Terrace.
Environmental Review Policy 18.2	Require environmental review and mitigation of impacts, if necessary, consistent with City, state, and federal requirements for development projects the Planning Area.	**Consistent**. This EIR analyzes the potential environmental impacts of the proposed project in accordance with applicable City, state, and federal laws and thresholds. Mitigation measures are proposed where feasible to reduce potentially significant impacts below a level of significance.
Environmental Review Policy 18.4	Require all development to conform to the General Plan, Facilities Plans, Areas Plans, and Quality of Life Standards.	**Consistent**. The project would pay applicable development fees that contribute to the City's ability to achieve the Quality of Life standards for public facilities and services. The project would implement the bicycle lanes on Felicita Road identified in the Bicycle Master Plan and would not inhibit implementation of other plans for public facilities. The project is not subject to an Area Plan and would conform to the General Plan with approval of a General Plan Amendment, as described further above.
Chapter III	***Mobility and Infrastructure***	
Complete Streets Policy 2.6	Ensure that the entire right-of-way is designed to accommodate appropriate modes of transportation.	**Consistent**. The project's improvements to widen Felicita Road, restripe the bicycle lane, and provide a sidewalk would accommodate vehicles, bicycles, and pedestrians. Along the project frontage, Brotherton Road would also accommodate these modes.

Policy Number	Policy Text	Consistency Analysis
Pedestrian Network Policy 3.4	Preserve and enhance pedestrian connectivity within existing neighborhoods via the Escondido Creek trail, sidewalks, and trails, and require a pedestrian network in new developments that provides efficient and well-designed connections to adjacent land uses, commercial districts, schools, and parks.	**Consistent**. The applicant proposes the installation of sidewalks where they currently do not exist along the project frontage on Felicita Road, which would provide additional pedestrian connectivity within the community.
Pedestrian Network Policy 3.5	Promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; orienting development toward the street; employing traffic calming measures; and enforcing vehicle speeds on both residential and arterial streets.	**Consistent**. The project would improve Felicita Road consistent with its ultimate designation in the General Plan Circulation Element and would provide a sidewalk along the project frontage from Brotherton Road to Palm Terrace. Trees would also be incorporated along the edges of the project site adjacent to sidewalks on both Felicita Road and Brotherton Road to improve the pedestrian experience.
TDM Policy 6.1	Develop and implement Transportation Demand Management (TDM) and complete street programs to reduce automobile travel demand that may include, but shall not be limited to preparing site-specific peak-hour traffic-management plans; promoting ride-sharing and carpooling for residents and non-residents through preferential parking; providing park-and-ride facilities adjacent to the regional transit system; and supporting transit subsidies.	**Consistent**. Development and implementation of TDM and complete street programs is the responsibility of the City. However, the project would incorporate features to reduce automobile travel demand in support of this policy. In accordance with mitigation measure TRA-1, the project would reduce VMT by providing pedestrian improvements at nearby intersections and along nearby streets.
Street Network Policy 7.1	Plan, design, and regulate roadways in accordance with the street classification in the Circulation Element Diagram.	**Consistent**. Felicita Road along the project frontage is designated as a Collector Street. In accordance with the General Plan standard for Collector Streets, an 84-foot-wide ROW can accommodate four lanes of travel with no parking. The applicant proposes widening the pavement within the Felicita Road ROW an additional 17 feet on the east side for a total paved width of 64 feet, which would achieve the ultimate buildout condition for Collector Streets identified in the General Plan. In addition, a 5.5-foot-wide sidewalk and curb and gutter would be constructed on the east side of the widened pavement that would extend to Palm Terrace. Bicycle lanes would be restriped within the ROW. No roadway designation for Brotherton Road at the project frontage is included in the General Plan Mobility and Infrastructure Element and no roadway expansion would be required to achieve the buildout condition of Brotherton Road.

Policy Number	Policy Text	Consistency Analysis
Street Network Policy 7.3	Strive to maintain LOS C or better throughout the City except for within the urban core. Establish LOS D as the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented "smart growth" and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the City.	**Consistent**. As discussed further in Section 4.11, *Transportation*, the project would implement transportation design features and compliance measures to improve roadway operations to meet LOS requirements. The project would construct the required improvements at the intersection of Brotherton Road/Miller Avenue and would contribute fair-share fees towards improvements at the intersections of Citracado Parkway/Felicita Road, Citracado Parkway/I-15 Northbound Ramps, and Gamble Land/I-15 Southbound Offramps.
Street Network Policy 7.7	Require new development projects to analyze local traffic impacts, and construct and implement the improvements required for that development.	**Consistent**. See response to Street Network Policy 7.3. The results of the project's traffic impact analysis are described further in Section 4.11, *Transportation*, and the project would construct or contribute fair-share fees for required improvements.
Street Network Policy 7.8	Require new development projects to analyze traffic impacts on the regional transportation system and pay a fair-share contribution to regional transportation improvements.	**Consistent**. No specific improvement requirements for regional transportation systems were identified in the project's traffic analysis, as discussed further in Section 4.11, *Transportation*. The project would pay the applicable regional traffic fee to fund ongoing improvements to regional transportation systems.
Water System Policy 12.5	Require new development to provide adequate water facilities and/or finance the costs of improvements necessary to serve the demands created by the development and/or anticipated growth determined by the City, as appropriate. Establish a system for the reimbursement of construction costs for backbone water system improvements in master planned development projects involving multiple phases and developers.	**Consistent**. The project would include construction of a series of water pipelines within the site and would connect to an existing eight-inch water main in Felicita Road and an existing six-inch water main in Brotherton Road. The project applicant would finance these connections and would be required to pay applicable connection fees that contribute to ongoing costs to improve the City's water system.
Water System Policy 12.12	Require new development to incorporate water conservation techniques into building and site design incorporating such elements as water efficient fixtures (e.g., low flow shower heads); drought-tolerant landscape, permeable hardscapes, and on-site stormwater capture and re-use facilities.	**Consistent**. The project would comply with current statewide building regulations related to water-efficient fixtures and would install landscape/irrigation consistent with the City's Water Efficient Landscape Regulations (Municipal Code Chapter 33, Article 62).

Policy Number	Policy Text	Consistency Analysis
Wastewater System Policy 13.5	Require new development to provide adequate wastewater facilities and finance the costs of improvements necessary to serve the additional demands created by the development and/or anticipated growth determined by the City, as appropriate. Establish a system for the reimbursement of construction costs for backbone wastewater system improvements in master planned development projects involving multiple phases and developers.	**Consistent**. The project would include construction of sewer pipelines within the site and points of connection to an existing 8-inch sewer main in Felicita Road and an existing 8-inch sewer main in Brotherton Road. The project applicant would finance these connections and would be required to pay applicable connection fees that contribute to ongoing costs to improve the City's water system.
Storm Drainage Policy 14.4	Require new development to create a mechanism to finance and fund ongoing maintenance of stormwater facilities.	**Consistent**. The project applicant would be responsible for financing ongoing maintenance of proposed stormwater infrastructure in accordance with the Stormwater Quality Management Plan (SWQMP) prepared for the project (Nasland Engineering 2023 and Nasland Engineering 2025a; Appendices M and N, respectively).
Storm Drainage Policy 14.5	Require new development to prepare drainage studies and improvement plans that demonstrate no net increase in stormwater runoff and compliance with adopted stormwater plans.	**Consistent**. According to the Hydrology Study prepared for the project (Nasland Engineering 2024 and Nasland Engineering 2025b; Appendices K and L, respectively), the project would reduce the flow rate and velocity of runoff from the site via the proposed on-site BMPs and pipes to route off-site flows to existing storm drains. There would be no net increase in stormwater runoff.
Storm Drainage Policy 14.6	Require new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion, while encouraging implementation of low impact development measures and the maximum use of natural drainage ways, consistent with sound engineering and best management practices.	**Consistent**. The project would increase the amount of impervious surface on the project site but would provide BMPs to accommodate site runoff and would maintain approximately 5,860 SF of impervious area.
Storm Drainage Policy 14.7	Require new development and redevelopment to minimize storm water runoff and contaminants entering drainage facilities by incorporating low impact development measures and other on-site design features such as bio-swales, retention ponds, and cisterns for storage and infiltration, treatment of flows, and appropriate BMPs consistent with the National Pollution Discharge Elimination System (NPDES).	**Consistent**. The project would implement BMPs identified in a project-specific SWPPP during construction and SWQMP during operation in accordance with NPDES requirements. Specifically, permanent BMPs would include three biofiltration basins within the project site to capture and treat runoff.
Storm Drainage Policy 14.8	Mitigate negative impacts to adjacent surrounding land uses from pertinent drainageway corridors by incorporating appropriate structural and non-structural best management practices BMPs. BMPs may include the use of screening, landscaping, or open space setbacks.	**Consistent**. The BMPs described above in response to Storm Drainage Policy 14.7 would prevent negative effects at surrounding properties given the project would capture and treat its own runoff. In addition, the project would provide pipes to route off-site runoff that currently flows onto the project site to an existing storm drain.

Policy Number	Policy Text	Consistency Analysis
Chapter IV	***Housing (Amended March 22, 2023)***	
Housing Policy 1.2	Housing projects shall fund all or a portion of public facilities and costs for providing municipal services directly related to the need created by the development. The amount must be proportional to the cost of the service or improvement to offset the impacts to public facilities, services, and operations.	**Consistent**. The project applicant would pay applicable development fees to provide funding for the City to achieve public facility standards for services such as fire, police, library, and parks. These fees are assessed on a per dwelling unit basis, thereby providing proportional funding to the additional needs created by the residential site.
Housing Policy 1.4	Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.	**Consistent**. The project site is surrounded by existing development and is located in an area where existing services and facilities are available for resident use.
Housing Policy 1.5	Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.	**Consistent**. The residential site proposes high-density, multi-family housing which is a compact use of land for the provision of residential units in the City. Infrastructure improvements on the site would be constructed to serve the proposed presidential project density.
Housing Policy 1.7	Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed-Use Overlay areas.	**Consistent**. The residential site would provide high-density, multi-family housing in a developed area where existing services and infrastructure are available to serve new housing.
Housing Policy 1.9	Improve affordability by promoting sustainable housing practices that incorporate 'whole system' approach to siting, designing, and constructing housing that is integrated into the building site, consumes less water, and improves water quality, reduces the use of energy and other resources, and minimizes its impact on the surrounding environment.	**Consistent**. The residential site would be constructed in accordance with applicable water efficiency standards and would meet current Title 24 requirements related to energy efficiency at the time of project approval, thereby reducing the use of energy at the site. As identified throughout this EIR, the project would implement mitigation measures when necessary to minimize environmental impacts.
Chapter V	***Community Health and Services***	
Parks and Recreation Policy 2.4	Require new residential development to contribute fees to finance acquisition and development of park and recreational facilities in compliance with the standards stipulated by Parks and Recreation Policy 2.3. Allow credit for the on-site dedication of land or facilities to be used for public park purposes, consistent with City standards.	**Consistent**. The project applicant would pay applicable development fees for the proposed dwelling units to provide funding for the City's acquisition and development of park facilities towards the 11.8 acres per dwelling unit goal established in Parks and Recreation Policy 2.3.
Chapter VI	***Community Protection***	
Emergency Services Policy 1.6	Require minimum road and driveway widths and clearances around structures consistent with local and State requirements to ensure emergency access.	**Consistent**. The project would provide drive aisles accessible via the full access driveways on Felicita Road and Brotherton Road. The driveway and drive aisle size is consistent with local requirements for emergency access.

Policy Number	Policy Text	Consistency Analysis
Fire Protection Policy 2.4	Require new residential and non-residential development to be constructed consistent with the California Fire Code and the requirements set by the State.	**Consistent**. The project would be designed and constructed in accordance with the California Fire Code, as adopted and amended by Chapter 11, Article 2 of the Escondido Municipal Code.
Fire Protection Policy 2.6	Require new development to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development.	**Consistent**. The project would contribute development fees established by Local Resolution No. 2019-152 to the public facility fee program to maintain fire protection service levels.
Fire Protection Policy 2.10	Establish and maintain an adequate fire flow in relation to structure, size, design, and requirements for construction and/or built-in fire protection.	**Consistent**. The project would relocate two fire hydrants within the project site and would construct appropriate water connections for fire flow at the site based on the proposed development.
Police Services Policy 3.5	Require new development to contribute fees to maintain police facilities and equipment that meet the needs of the community.	**Consistent**. The project would contribute development fees established by Local Resolution No. 2019-152 to the public facility fee program to maintain police services and facilities.
Noise Policy 5.1	Require development to meet acceptable exterior noise level standards as established in Figure VI-12 and use the future noise contour map (FigureVI-17) as a guide for evaluating the compatibility of new noise sensitive uses with projected noise levels.	**Consistent**. As discussed further in this section, project-specific exterior noise levels were calculated and are reported in the project's Noise Technical Report (Appendix I). The report states noise levels within the outdoor pool and amenity area associated with the residential development would be 44.1 CNEL, which is within the range of normally acceptable exterior noise levels for multi-family residential uses provided in General Plan Figure VI-12. Additionally, noise levels at the lawn and basketball court associated with the church development were modeled to be 67.3 CNEL and 67.9 CNEL, respectively. Noise levels at the play area south of the school building were modeled to be 66.8 CNEL. These noise levels are within the conditionally compatible range of noise levels for church and school land uses provided in General Plan Figure VI-12.
Noise Policy 5.2	Apply a CNEL of 60 dB or less for single family and 65 CNEL or less for multi-family as goals where outdoor use is a major consideration (back yards and single-family housing developments, and recreation areas in multifamily housing developments) as discussed in Figure VI-13, and recognize that such levels may not necessarily be achievable in all residential areas.	**Consistent**. See response to Noise Policy 5.1. Noise levels within the residential pool and amenity area would be below 65 CNEL.

Policy Number	Policy Text	Consistency Analysis
Noise Policy 5.4	Require noise attenuation for new noise-sensitive uses, which include residential, daycare facilities, schools, churches, transient lodging, hotels, motels, hospitals, health care facilities, and libraries if the projected interior noise standard of 45 CNEL is exceeded.	**Consistent**. Additional exterior-to-interior noise analyses would be conducted once final building plan information is available to ensure that interior noise levels at the project residential units, church building, and missionary residential units do not exceed 45 CNEL. As a condition of project approval, if predicted noise levels are found to be in excess of 45 CNEL, specific architectural materials or techniques that could be included to reduce noise levels to 45 CNEL in usable rooms would be incorporated. Refer to Section 3.6 for more details. The project would require noise attenuation, if necessary, consistent with this policy.
Noise Policy 5.5	Require construction projects and new development to ensure acceptable vibration levels at nearby noise-sensitive uses based on Federal Transit Administrator criteria.	**Consistent with Mitigation**. The Noise Technical Report (Appendix I) assessed potential vibration levels from construction activity at nearby land uses in accordance with Federal Transit Administration (FTA) criteria. The project would be required to implement mitigation measure NOI-1 to reduce vibration levels during construction below the applicable thresholds.
Noise Policy 5.6	Require the preparation of noise studies, as deemed necessary by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14.	**Consistent**. A Noise Technical Report (Appendix I) was prepared for the project and determined the project would not increase traffic noise levels above the allowable increment provided in Figure VI-14 of the General Plan Community Protection Element.
Noise Policy 5.7	Encourage use of site and building design, noise barriers, and construction methods as outlined in Figure VI-15 to minimize impacts on and from new development.	**Consistent**. The proposed outdoor pool and amenity area associated with the residential development and the play area south of school buildings would be shielded from noise sources based on the siting of proposed and existing buildings, as suggested in Figure VI-15. The Noise Technical Report (Appendix I) states noise levels within the outdoor pool and amenity area would be 44.1 CNEL and 66.8 CNEL at the play area south of the school building, which would not exceed applicable noise standards. In addition, no barriers are required to reduce the effects of project-generated noise at surrounding land uses given the project would not increase noise levels at these uses above the allowable noise increment.
Noise Policy 5.8	Require that mixed use and multi-family residential developments demonstrate that the design of the structure will adequately isolate noise between adjacent uses (orientation, window insulation, separation of common walls, floors, and ceilings, etc.).	**Consistent**. In accordance with Title 24 of the CBC, the residential site would be required to demonstrate wall construction with a Sound Transmission Class rating of at least 50 for walls between dwelling units, which would adequately isolate noise between residences with shared walls.

Policy Number	Policy Text	Consistency Analysis
Noise Policy 5.10	Require development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.	**Consistent with Mitigation**. The Noise Technical Report (Appendix I) assessed potential noise impacts from construction activity in accordance with Escondido Municipal Code Section 17-234. As described further in Section 4.9, the project would not generate noise levels that exceed the 75 A-weighted decibel (dBA) 1-hour time-averaged noise limit (L_{EQ}) at nearby sensitive uses.
Hazardous Materials Policy 8.10	Require proponents of projects in known contamination areas to perform comprehensive soil and groundwater contamination assessments, in accordance with applicable regulations. If contamination exceeds regulatory levels, require the proponent to undertake remediation procedures consistent with county, regional, and state regulations prior to grading and development of the site.	**Consistent with Mitigation**. As described further in Section 4.7, *Hazards and Hazardous Materials*, the project site contains soils with dieldrin levels slightly exceeding the applicable concentration appropriate for residential uses (FREY Environmental Inc. 2022; FREY Environmental Inc. 2023). In accordance with applicable regulatory standards and mitigation measure HAZ-1, excavation, removal, and off-site disposal of the contaminated soil would be profiled and disposed of at an appropriate disposal facility.
Chapter VII	***Resource Conservation***	
Biological and Open Space Resources Policy 1.6	Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened, or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, require mitigation of resources either on- or off-site at ratios consistent with State and federal regulations, and in coordination with those agencies having jurisdiction over such resources.	**Consistent with Mitigation**. As described further in Section 4.3, *Biological Resources*, the project has the potential to result in significant impacts to nesting birds, sensitive natural communities, and potentially jurisdictional wetlands. Mitigation measures BIO-1 through BIO-3 would reduce these potential impacts to less than significant levels and would require the provision of habitat mitigation at ratios consistent with the draft Escondido MHCP Subarea Plan and/or final state and federal permit conditions.
Biological and Open Space Resources Policy 1.7	Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.	**Consistent**. The biological resources report prepared for the project documents the results of multiple surveys of the project site, which were conducted to assess the presence of sensitive biological resources on the project site. The results of the surveys are described further in Chapter 4.3, *Biological Resources*, and the biological resources reports contained in Appendices C and D.
Biological and Open Space Resources Policy 1.8	Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.	**Consistent with Mitigation**. Areas surrounding the project site are developed and do not contain sensitive resources requiring additional buffering or setbacks. Sensitive biological resources within the project site may be impacted by the project. The proposed mitigation measures (BIO1 through BIO-3) would reduce potential impacts to these resources to a less than significant level through avoidance measures or compensatory mitigation where avoidance is not possible.

Policy Number	Policy Text	Consistency Analysis
Biological and Open Space Resources Policy 1.9	Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.	**Consistent**. The project would remove the palm trees currently on the project site to create a functional layout for the proposed buildings. However, the project would plant 682 new trees on the site, far exceeding the number of trees that would be removed.
Biological and Open Space Resources Policy 1.10	Prohibit any activities in riparian areas other than those permitted by appropriate agencies to protect those resources.	**Consistent with Mitigation**. Due to the presence of emergent wetland on the project site, the project applicant would be required to obtain permits from USACE, CDFW, and/RWQCB prior to impacts to riparian habitat. In accordance with mitigation measure BIO-3, the project applicant would mitigate direct impacts to emergent wetland through off-site restoration or purchase of mitigation credits at an approved mitigation bank.
Biological and Open Space Resources Policy 1.12	Promote the use of native plants for public and private landscaping purposes within the City.	**Consistent**. Project landscaping would comply with the standards contained in Escondido Municipal Code Section 33-1339, which discourage the use of non-native vegetation especially of species requiring large amounts of water.
Visual Resources Policy 3.1	Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state, to the extent possible.	**Consistent**. As described further in Section 4.1, *Aesthetics*, the project would not result in significant impacts related to visual resources given the project site does not contain scenic visual resources and would not obstruct views of such resources. The project would be consistent with this policy.
Visual Resources Policy 3.2	Require new development to avoid obstructing views of, and to minimize impacts to, significant visual resources through the following: creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks.	As described in response to Visual Resources Policy 3.1, the project would not obstruct views of scenic resources.

Policy Number	Policy Text	Consistency Analysis
Visual Resources Policy 3.6	Require that development within the I-15 corridor be located and designed in consideration of its potential visual impacts and preservation of prominent views along the corridor that include outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings. Require development proposals within the I-15 scenic corridor (defined as the area within 1,750 feet of the freeway) to include a visual assessment and conform to the community design policies which address: a) The siting of new structures outside of significant viewshed corridors; b) The protection of hillsides and ridgelines; and c) The need to blend developments with their setting in terms of height and scale.	**Consistent**. Section 4.1, *Aesthetics* conducts a visual assessment for the project. The project is within the I-15 corridor but would not obstruct significant views given that continuous panoramic views of distant peaks and ridgelines are not available from the project site or surrounding roadways. In addition, while the applicant proposes higher density development than nearby existing residences, the General Plan envisions this area of the City with more intense development.
Cultural Resources Policy 5.2	Preserve significant cultural and paleontological resources listed on the national, State, or local registers through maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.	**Consistent with Mitigation**. As described in Section 4.4, *Cultural Resources*, the existing building proposed for demolition and the two existing education buildings to remain are not eligible for listing as historic resources (Appendix F) and the project site does not contain known listed cultural resources (Appendix E). However, based on the potential for unknown cultural resources to be unearthed during project construction, mitigation measures CUL-1 through CUL-10 would require implementation of a monitoring program. No paleontological resources would be uncovered at the project site, as it is underlain by fill and granitic bedrock, which have no potential to contain fossils (City 2012c).
Water Resources and Quality Policy 6.6	Control encroachments into wetlands and designated floodways to protect the community's water resources.	**Consistent with Mitigation**. The on-site drainage swale contains emergent wetlands that would be impacted by the project. Mitigation measure BIO-3 would require the provision of compensatory habitat mitigation or the purchase of mitigation credits at an approved mitigation bank and adherence to permit conditions for wetland encroachment.
Water Resources and Quality Policy 6.12	Regulate construction and operational activities through the use of stormwater protection measures in accordance with the City's NPDES permit.	**Consistent**. The project would implement BMPs identified in a project-specific SWPPP during construction and SWQMP during operation in accordance with NPDES requirements.
Water Resources and Quality Policy 6.14	Require new development to protect the quality of water resources and natural drainage systems through site design and use of source controls, stormwater treatment, runoff reduction measures, best management practices, and Low Impact Development measures.	**Consistent**. The project would implement stormwater BMPs during construction and operation to protect water quality, as described in responses to Storm Drainage Policy 14.7 and Water Resources and Quality Policy 6.12.

Policy Number	Policy Text	Consistency Analysis
Air Quality and Climate Protection Policy 7.3	Require that new development projects incorporate feasible measures that reduce construction and operational emissions.	**Consistent**. The residential project would meet current Title 24 standards at the time of project approval and implement CAP measures to reduce GHG emissions. In addition, no electric or natural gas fireplaces, wood fireplaces, or wood stoves would be installed, which greatly reduces the amount of on-site pollutant emissions generated during project operation. During construction, dust control measures would be implemented and VOC content in paints would be limited in accordance with SDAPCD Rules 50, 55, 67.0.1.

This page intentionally left blank

4.9 Noise

This section provides an analysis of potential noise impacts resulting from construction and operation of the proposed project. The existing conditions and regulatory framework related to noise are also provided in this section. The following analysis primarily relies on the assessment of potential noise impacts presented in the project's Noise Technical Report (HELIX 2025), which is included as Appendix I to the EIR.

4.9.1 Existing Conditions

4.9.1.1 Noise and Sound Level Descriptors and Terminology

Descriptors

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with dBA to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration. The CNEL is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours but no added weighting on the evening hours. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

Terminology

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Interference from the atmosphere, structures, and vegetation causes sound levels to decrease over distance. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (µPa). One µPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 µPa. Because of this wide range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of dBA. The threshold of hearing for the human ear is about 0 dBA, which corresponds to 20 µPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. For example, if one automobile produces an SPL of 70 dB when it passes an observer, two cars passing simultaneously would not produce 140 dBA—rather, they would combine to produce 73 dBA. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dBA louder than one source.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1-dBA changes in sound levels, when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dBA are generally not perceptible. It is widely accepted, however, that people begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dBA increase is generally perceived as a distinctly noticeable increase, and a 10-dBA increase is generally perceived as a doubling of loudness.

No known studies have directly correlated the ability of a healthy human ear to discern specific levels of change in traffic noise over a 24-hour period. Many ordinances, however, specify a change of 3 CNEL as the significant impact threshold. This is based on the concept of a doubling in noise energy resulting in a 3 dBA change in noise, which is the amount of change in noise necessary for the increase to be perceptible to the average healthy human ear.

4.9.1.2 Vibration Descriptors and Terminology

Vibration is measured in feet or inches (in). Acceleration is measured by comparing acceleration to that of the Earth's gravity, and this unit is "G." These units of acceleration or velocity are relative to time in seconds (sec) and are noted as in/sec^2 for acceleration and in/sec for velocity. Displacement is not relative to time and is only shown as inches.

Vibration effects can be described by its peak and root mean square amplitudes. Building damage is often discussed in terms of peak velocity, or peak particle velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration signal. PPV is related to the stresses that are experienced by buildings; it is often used in the monitoring of blasting vibration and in discussing construction vibration.

The root mean square amplitude is useful for assessing human annoyance, as it describes a smoothed vibration amplitude. Although it is not universally accepted, decibel notation is also commonly used to describe vibration levels. Decibel notation serves to compress the range of numbers required to describe

vibration. Vibration velocity levels are defined as $L_V = 20 \times LOG_{10}(V/V_{REF})$ where "L_V" is the velocity level in decibels, "V" is the root mean square velocity amplitude, and "V_{REF}" is the reference velocity amplitude (Federal Transit Administration [FTA] 2018). The reference quantity must be specified, as reference vibration levels may be provided in inches or meters per second. Vibration levels provided in the following analysis are referenced to 1×10^{-6} inches per second as vibration decibels (VdB).

4.9.1.3 Noise-Sensitive and Vibration-Sensitive Land Uses

Noise-sensitive land uses (NSLUs) are land uses that may be subject to stress and/or interference from excessive noise, including residences, hospitals, schools, hotels, resorts, libraries, sensitive wildlife habitat, or similar facilities where quiet is an important attribute of the environment. Noise receptors are individual locations that may be affected by noise. The closest NSLUs to the project site are Miller Elementary School across Brotherton Road with outdoor recreation areas, located approximately 65 feet to the north and classroom buildings located approximately 360feet to the north, and the single-family residential properties surrounding the project site (refer to Figure 2-3). The nearest residences to the project site are adjacent to the project site to the east and south, 40 feet to the north across Brotherton Road, and 60 feet to the west across Felicita Road. Additionally, the multifamily residential buildings and the existing school buildings on the project site would be considered NSLUs.

Land uses in which ground-borne vibration could potentially interfere with operations or equipment, such as research, manufacturing, hospitals, and university research operations (FTA 2018) are considered "vibration-sensitive." The degree of sensitivity depends on the specific equipment that would be affected by the ground-borne vibration. In addition, excessive levels of ground-borne vibration of either a regular or an intermittent nature can result in annoyance to land uses where people sleep, such as residences, hotels, hospitals, and dormitories. The closest vibration-sensitive uses to the project site are the single-family homes surrounding the project site described above.

4.9.1.4 Existing Noise Environment

The existing environment is dominated by traffic noise from the nearby I-15. Additional noise sources include traffic noise from Felicita Road, and the less-travelled Brotherton Road. Three noise measurements were taken at the project site during an ambient noise survey conducted on June 13, 2023. Two 15-minute measurements were taken—one within the southwestern quadrant of the site near Felicita Road and one at the southeast corner of the existing parking lot just east of the project site—both pointing toward I-15. The first measurement recorded a noise level of 61.2 dBA L_{EQ} and the second measurement recorded a noise level of 77.8 dBA L_{EQ} given its higher elevation with line of sight to I-15. A 24-hour measurement taken along the southeastern boundary of the existing parking lot, pointing south toward I-15, measured a day-night noise level of 74.8 dBA L_{DN}. A total of 168 vehicles were recorded during a traffic count conducted along Felicita Road during the ambient noise survey consisting of 98 percent automobiles, 2 percent medium trucks, and no heavy trucks.

4.9.2 Regulatory Framework

4.9.2.1 State Regulations

California Noise Control Act

The California Noise Control Act is a section within the California H&SC that describes excessive noise as a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in

physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Noise Insulation Standards

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for multi-family residential buildings (CCR Title 24, Part 2). Title 24 establishes standards for interior noise (attributable to outside noise sources) within habitable rooms. Where standard building materials would not ensure compliance with this requirement, additional acoustical analysis is required. Such acoustical analysis must demonstrate that the residence has been designed to limit intruding noise to an interior noise level below 45 CNEL (or L_{DN}).

4.9.2.2 Local Regulations

City of Escondido Community Protection Element

The goal of the Community Protection Element of the City's General Plan (City 2012a) is to minimize the impact of noise on the community by identifying existing and potential noise sources and providing the policies and standards necessary to keep noise from reducing the quality of life in the City. The Community Protection Element establishes guidelines to evaluate the compatibility of land uses and noise exposure levels. Table 4.9-1, *Exterior Land Use/Noise Compatibility Guidelines*, summarizes the City's exterior land use/noise compatibility guidelines.

Table 4.9-1
EXTERIOR LAND USE/NOISE COMPATIBILITY GUIDELINES

Land Use Category	Community Noise Exposure (dBA CNEL)						
	55	60	65	70	75	80	
Residential Single-family, Duplex, Mobile Home							
Residential Multi-family, Residential Mixed Use							
Transient Lodging, Motels, and Hotels							
Schools, Libraries, Churches, Hospitals, and Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Offices Buildings, Business, Commercial, and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable – Specified land use is satisfactory, based upon the assumption that buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will usually suffice.

Normally Unacceptable – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with noise insulation features included in the design.

Clearly Unacceptable - New construction or development clearly should not be undertaken.

Source: City 2012a

The Community Protection Element also states that the exterior standard should not normally be applied to balconies or patios associated with residential uses. In addition, noise impacts of proposed projects on existing land uses should be evaluated in terms of potential for adverse community response, based on a significant increase in existing noise levels. For example, if an area currently is below the maximum normally acceptable level, an increase in noise up to the maximum should not necessarily be allowed. Projects increasing noise levels by 5 dBA or greater should be considered a significant impact that requires mitigation.

The Community Protection Element also includes exterior incremental environmental noise impact standards for NSLUs, shown in Table 4.9-2, *Incremental Noise Impact Standards*. The allowable increase in noise levels decreases as ambient noise levels increase. In addition, the standards include separate allowable noise increases for land uses that are more noise sensitive during the day (peak hour) versus at night where people normally sleep (24-hour).

Table 4.9-2
INCREMENTAL NOISE IMPACT STANDARDS

Residences and Buildings Where People Normally Sleep		Institutional Land Uses with Primarily Daytime and Evening Uses	
Existing L_{DN}	Allowable Noise Increment	Existing Peak Hour L_{EQ}	Allowable Noise Increment
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

Source: City 2012a
L_{DN} = day-night noise level; L_{EQ} = one-hour noise level

Noise Policy 5.5 of the Community Protection Element requires construction projects to achieve acceptable vibration levels at nearby vibration-sensitive land uses based on FTA criteria, as shown in Table 4.9-3, *Ground-borne Vibration Impact Criteria*. The category of infrequent events is applicable to construction activities (City 2012c).

Table 4.9-3
GROUND-BORNE VIBRATION IMPACT CRITERIA

Land Use Category	Impact Criteria (VdB)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65[4]	65[4]	65[4]
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

Source: City 2012c

1 "Frequent Events" is defined as more than 70 vibration events of the same source per day.

2 "Occasional Events" is defined as between 30 to 70 vibration events of the same source per day.

3 "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day.

4 This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels.

VdB = vibration decibels

City of Escondido Municipal Code Chapter 17, Article 12, Noise Abatement and Control

Escondido Municipal Code Chapter 17, Article 12, *Noise Abatement and Control*, establishes prohibitions for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens. Table 4.9-4, *Exterior Noise Limits*, provides the allowable noise levels at any point on or beyond the boundaries of the property on which the sound is produced, and corresponding times of day for each zoning designation. The noise standards apply to each property or portion of property substantially used for a particular land use. Where two or more dissimilar land uses occur on a single property, the more restrictive noise limits apply. Additional noise restrictions are listed in Sections 17-226 through 17-260 of the Noise Ordinance and those applicable to this analysis are provided below.

Table 4.9-4
EXTERIOR NOISE LIMITS

Zone	Time	Noise Limit (dBA L_{EQ})
Residential zones	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
Multi-residential zones	7:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial zones	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	55
Light industrial/Industrial park zones	Anytime	70
General industrial zones	Anytime	75

Source: Escondido Municipal Code Section 17-229, Sound Level Limits

dBA = A-weighted decibels; L_{EQ} = one-hour noise level

Section 17-229(c)(Corrections to Exterior Noise Level Limits)

Section 17-229 (c)(5) of the Noise Ordinance, *Corrections to Exterior Noise Level Limits*, includes the following regulations:

1) If the noise is continuous, the L_{EQ} for any hour will be represented by any lesser time period within that hour. Noise measurements of a few minutes only will thus suffice to define the noise level.

2) If the noise is intermittent, the L_{EQ} for any hour may be represented by a time period typical of the operating cycle. Measurement should be made of a representative number of noisy/quiet periods. A measurement period of not less than 15 minutes is, however, strongly recommended when dealing with intermittent noise.

3) In the event the alleged offensive noise, as judged by the enforcement officer, contains a steady, audible sound such as a whine, screech, or hum, or contains a repetitive impulsive noise such as hammering or riveting, the standard limits set forth in Table 17-229 [Table 4.9-4], shall be reduced by 10 dBA or to the ambient noise level when such noises are not occurring.

4) If the measured ambient level exceeds that permissible in subsection (a) of this section [Table 4.9-4], the allowable noise exposure standard shall be the ambient noise level. The ambient level shall be measured when the alleged noise violations source is not operating.

5) The sound level limit at a location on a boundary between two land use classifications is the limit applicable to the receiving land use; provided, however, that the one-hour average sound level limit applicable to extractive industries including, but not limited to, borrow pits and mines, shall be 75 dBA at the property line regardless of the zone where the extractive industry is actually located.

   Fixed-location public utility distribution or transmission facilities located on or adjacent to a property line shall be subject to the noise level limits of this section, measured at or beyond 6 feet from the boundary of the easement upon which the equipment is located.

Section 17-234 (Construction Equipment)

Except for emergency work, it shall be unlawful for any person, including the City of Escondido, to operate construction equipment as follows:

(a) It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays between the hours of 9:00 a.m. and 5:00 p.m., and provided that the operation of such construction equipment complies with the requirements of subsection (d) of this section.

(b) It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the President, Governor, or City Council as public holidays.

(c) A person may operate construction equipment at his/her residence or for the purpose of constructing or modifying a residence for himself/herself on Monday through Friday of a week

between the hours of seven a.m. and six p.m., and on Saturdays, Sundays, and holidays between the hours of nine a.m. and five p.m.; provided, that such operation of construction equipment is not carried on for profit or livelihood and complies with the requirements of subsection (d) of this section.

(d) No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of 75 dBA at any time, unless a variance has been obtained in advance from the City Manager.

(e) Persons engaged in construction for profit or as a business shall post signs at conspicuous places on a construction site, indicating hours of work as prescribed by this article or authorized by permit and the applicable noise level limits.

Section 17-237 (Landscape Equipment)

It shall be unlawful for any person, including the City of Escondido, to use any motorized landscape equipment, including but not limited to power blowers and vacuums, which causes a disturbing, excessive, or offensive noise as defined under Section 17-227(k) of this article.

Section 17-238 (Grading)

(a) It shall be unlawful for any person, including the City of Escondido, to do any authorized grading at any construction site, except on Mondays through Fridays during a week between the hours of 7:00 a.m. and 6:00 p.m. and, provided a variance has been obtained in advance from the City Manager, on Saturdays from 10:00 a.m. to 5:00 p.m.

(b) For the purpose of this section, "grading" shall include, but not be limited to, compacting, drilling, rock crushing or splitting, bulldozing, clearing, dredging, digging, filling, and blasting.

(c) In addition, any equipment used for grading shall not be operated so as to cause noise in excess of a one-hour sound level limit of 75 dBA at any time when measured at or within the property lines of any property which is developed and used in whole or in part for residential purposes, unless a variance has been obtained in advance from the City Manager.

Section 17-240 (General Noise Regulations)

Section 17-240 includes additional general noise regulations. This section states that it is unlawful for any person to make, continue or cause to be made or continued, any disturbing, excessive, or offensive noise which causes discomfort or annoyance to reasonable persons of normal sensitivity. Noises declared to be disturbing, excessive, and offensive include stereo equipment, animal noise, and loading and unloading of vehicles that disturb neighboring receptors.

4.9.3 Thresholds of Significance

Thresholds used to evaluate potential noise impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant noise impact could occur if the implementation of the proposed project would result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Escondido General Plan or noise ordinance;

b. Generation of excessive ground-borne vibration or ground-borne noise levels; or

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

Operational noise impacts related to threshold (a) would be considered significant if the project would result in a permanent increase in ambient noise levels exceeding the City's noise limits provided in Table 4.9-4 or would result in a permanent increase in transportation noise that would exceed the allowable incremental noise increase listed in Table 4.9-2.

Significant construction noise impacts would occur if the project would generate construction noise exceeding 75 dBA L_{EQ} (1 hour) or would operate construction equipment outside of the allowed construction hours between 7:00 a.m. and 6:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturdays.

Significant vibration impacts associated with threshold (b) would occur if the project would generate vibration during construction exceeding the FTA annoyance thresholds for infrequent vibration events, which are 65 VdB for vibration-sensitive uses, 80 VdB for residences and buildings where people normally sleep, and 83 VdB for institutional land uses with primarily daytime uses. In addition, a significant vibration impact related to building damage would occur if the project would expose buildings to vibration levels that exceed FTA thresholds, the lowest of which is 90 VdB for buildings extremely susceptible to vibration damage (FTA 2018).

A significant impact related to threshold (c) would occur if aircraft activity would expose the project land use to noise levels that exceed the City's noise compatibility standard for that use.

4.9.4 Methodology and Assumptions

4.9.4.1 Noise Modeling Methodology

Modeling of the exterior noise environment was accomplished using the computer noise model Computer Aided Noise Abatement (CadnaA) version 2022. CadnaA is a model-based computer program developed by DataKustik for predicting noise impacts in a wide variety of conditions. CadnaA traffic noise prediction is based on the data and methodology used in the Traffic Noise Model released by the USDOT. Peak-hour traffic volumes are estimated based on the assumption that approximately 10 percent of ADT would occur during a peak hour. The one-hour L_{EQ} noise level is calculated utilizing peak-hour traffic. Peak hour L_{EQ} can be converted to CNEL using the following equation, where $L_{EQ}(h)pk$ is the peak hour L_{EQ}, P is the peak hour volume percentage of ADT, d and e are divisions of the daytime fraction of ADT to account for daytime and evening hours, and N is the nighttime fraction of ADT:

$$CNEL = L_{EQ}(h)pk + 10\log10\ 4.17/P + 10\log10(d + 4.77e + 10N)$$

The model-calculated one-hour L_{EQ} noise output is therefore approximately equal to the CNEL (Caltrans 2013).

Project construction noise was analyzed using the Roadway Construction Noise Model (RCNM; USDOT 2008), which utilizes estimates of sound levels from standard construction equipment.

4.9.4.2 Construction Noise

Construction activities would include site preparation, demolition, grading, underground utility installation, building construction, paving, and architectural coatings. Construction equipment usage based on information from the project engineer and CalEEMod assumptions, as detailed in Table 4.2-7.

Worker commute trips are anticipated to vary between approximately 6 and 217 trips per day, depending on construction activity. Approximately 40 vendor trips are anticipated per day during building construction (36 for residential construction, 4 for church construction). Vegetation hauling during site preparation would result in 1 one-way trip per day per site, demolition debris hauling would result in 7 one-way trips per day from residential construction and 4 one-way trips per day from church construction, and soil export hauling during grading would result in 30 one-way trips per day. Paving would require the import of asphalt and concrete estimated to include 42 one-way trips per day during residential development paving and 19 one-way trips per day during church development paving, assuming an uncompressed pavement thickness of six inches and tandem trailer truck loads.

4.9.4.3 Operational Noise

Operational noise sources anticipated to be associated with development of the project are primarily associated with the use of building heating, ventilation, and air conditioning HVAC) systems, and the addition of project-related traffic to area roadways.

Heating, Ventilation, and Air Conditioning Units

The specific HVAC systems and locations that would be installed for the project have not been identified at this stage of project design. This analysis assumes the residential building design would use one typical to larger-sized residential HVAC split system for each residence and the HVAC condensers would be mounted on the building roofs behind 3-foot high parapets; the church would use large commercial rooftop package systems mounted behind parapets 4 feet high. The residential HVAC system assumed in this analysis is a Carrier model 38BRC-024-34 2-ton split system (one for each of the 258 residential unit plus 18 additional systems for common areas, 276 total HVAC systems), which have a sound power level of 76 dBA (Carrier 2005). For the church, Carrier 50PG03-14 12.5-ton HVAC package systems with a sound power level of 83 dBA were assumed (Carrier 2008). Standard commercial HVAC planning assumes approximately one ton of HVAC for every 350 SF of habitable space (American Society of Heating, Refrigeration, and Air Conditioning Engineers 2021). Based on the church size (22,700 SF), six 12.5-ton HVAC systems would be required.

Vehicular Traffic

The project's LMA states that the project would generate 1,548 ADT (LLG 2025; Appendix J). Since the size of the proposed new church building (24, 627 SF) would essentially be the same size as the existing church building (24,395 SF), the church development would not result in a net increase in operational traffic trips. Therefore, only the residential component of the project was included in the analysis of traffic effects. The project's LMA also provides the corresponding segment volume data under Existing and Existing Plus Project conditions. Traffic for the I-15 freeway was provided by the SANDAG Transportation Forecast Information Center, which indicates I-15 near the project site would carry approximately 236,400 ADT

under the Forecast Year 2025. A traffic distribution of 97 percent automobiles, 2 percent medium trucks, and 1 percent heavy trucks was used in the traffic noise analysis for local roads based on the site visit and a distribution of 91.7 percent automobiles, 3.5 percent medium trucks, and 4.8 percent heavy trucks was used for I-15 (Caltrans 2024).

4.9.5 Project Impact Analysis

4.9.5.1 Excessive Noise Levels

Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Escondido General Plan or noise ordinance?

Impact Discussion

Construction Noise

Construction of the project is anticipated to occur during daytime hours, pursuant to Escondido Municipal Code Section 17-234.

The two school buildings on the project site are associated with the church and would be vacated and modified as part of the project to connect with the new church building. As such, these two school buildings are considered a part of the project and are not considered NSLUs for project construction impact analysis.

On-Site Construction Equipment Noise

Potentially significant construction noise impacts would occur if off-road construction equipment would generate noise that exceeds the 75 dBA L_{EQ} standard from the City's Municipal Code.

Construction of the project would require demolition of the existing church building, site preparation, grading, installation of underground utilities/infrastructure, construction of new buildings, paving, and architectural coating. The magnitude of the noise generated would depend on the type of construction activity, equipment, duration of each construction phase, distance between the noise source and receiver, and any intervening structures. Construction would generate elevated noise levels that may disrupt NSLUs surrounding the project site.

Table 4.9-5, *Construction Equipment Noise Levels,* provides construction equipment noise levels for anticipated construction equipment at distances representative of the closest NSLUs to the project site. Construction equipment would not all operate at the same time or location and would not be in constant use during the eight-hour operating day; therefore, for noise level prediction purposes, a conservative average distance from construction activities to the nearest residences is provided. Receivers R1, R2, and R3 are the closest off-site residential property lines to construction of the residential development. Receivers R3, R4, and R5 are the closest off-site residential property lines to the church development. Other nearby residences would be located at greater distances from the project's construction activities. The receiver locations are provided in Figure 4.9-1, *Noise Receiver Locations*.

Table 4.9-5
CONSTRUCTION EQUIPMENT NOISE LEVELS

Unit	Percent Operating Time	L_{MAX} at 50 feet[1] (dBA)	Resulting Noise Level at Noise-Sensitive Land Uses[2] (1-hour dBA L_{EQ})				
			R1 & R2 350 feet	R3 315 feet	R4 270 feet	R5 230 feet	R6 415 feet
Backhoe	40	78	56.7	57.6	58.9	60.3	55.2
Bulldozer	40	78	60.8	61.7	63.0	64.4	59.3
Compressor (air)	40	78	56.8	57.7	59.0	60.4	55.3
Crane	20	81	55.7	56.6	57.9	59.3	54.2
Excavator	40	81	59.8	60.7	62.1	63.5	58.3
Generator	50	81	60.7	61.6	63.0	64.4	59.2
Grader	40	85	64.1	65.0	66.4	67.8	62.6
Paver	50	77	57.3	58.2	59.6	61.0	55.8
Roller	20	80	56.1	57.0	58.4	59.8	54.6
Scraper	40	84	62.7	63.6	65.0	66.3	61.2
Flat Bed Truck	40	84	53.4	54.3	55.6	57.0	51.9
Welder/Torch	40	74	53.1	54.0	55.4	56.8	51.6

Source: USDOT 2008

[1] L_{MAX} values are based on representative equipment in RCNM ("Actual Measured" levels).

[2] Receiver noise levels at various distances were evaluated using RCNM.

L_{MAX} = maximum noise level; dBA = A-weighted decibel; L_{EQ} = time-averaged sound level.

R1, R2, R3 – Receivers affected by construction of the residential development.

R4, R5, R6 – Receivers affected by construction of the church development.

As shown in Table 4.9-5, construction of the project would not require equipment that would generate noise levels exceeding 75 dBA L_{EQ} (1-hour) at any of the receiver locations. Multiple construction equipment types would be in use throughout the day. A grader and a scraper could operate on the site simultaneously but would not operate in close proximity to one another at a given time due to the nature of their respective operations. Nevertheless, a grader and scraper were analyzed together due to their likelihood of being used in conjunction with one another. Table 4.9-6, *Combined Construction Noise Levels,* provides the calculated combined construction noise level generated by a grader and a scraper.

Table 4.9-6
COMBINED CONSTRUCTION NOISE LEVELS

Construction Phase/Activity	Two Loudest Pieces of Equipment in Phase	Combined 1-hour L_{EQ} at 50 feet (dBA)	Combined Noise Level at Noise-Sensitive Land Uses (1-hour dBA L_{EQ})				
			R1 & R2 350 feet	R3 315 feet	R4 270 feet	R5 230 feet	R6 415 feet
Grading	Grader and Scraper	83.4	66.5	67.4	68.7	70.1	65.0

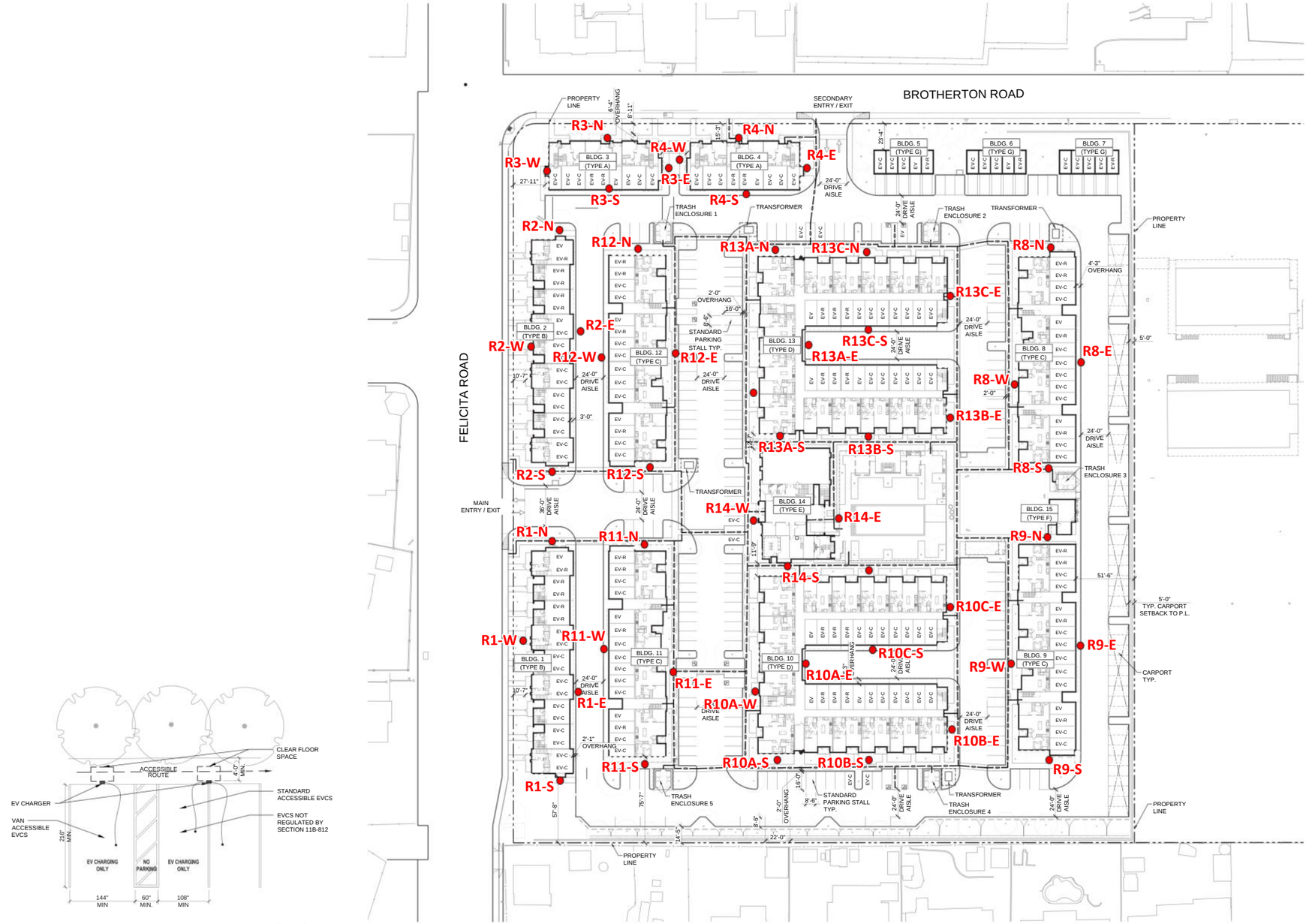
Source: RCNM (USDOT 2008)

dBA = A-weighted decibel; L_{EQ} = equivalent sound level.

R1, R2, R3 – Receivers affected by construction of the residential development.

R3, R4, R6, R6 – Receivers affected by construction of the church development.

As shown in Table 4.9-6, noise levels at each receiver would not exceed the 75 dBA 1-Hour L_{EQ} limit.



SITE PLAN 1

LEGEND

- PROPERTY LINE
- ADA PATH OF TRAVEL
- EV-C — EV CAPABLE STALLS
- EV-R — EV READY STALLS
- EV — EV CHARGER STALLS
- RECEIVER LOCATION

NOTE :

1. EXISTING OVER HEAD UTILITIES AND POLES TO BE UNDERGROUNDED, REFER TO CIVIL DRAWINGS.

TYP. EV. PARKING STATION 2

Source: adc 2024

HELIX Environmental Planning

On-Site Receiver Locations

Figure 4.9-1

Off-Site Construction Traffic Noise

Impacts from construction traffic noise would be potentially significant if the addition of project-related construction traffic (truck trips and construction worker commute trips) to existing traffic on area roads would result in an increase of more than 3 dBA (a just perceptible increase in noise in typical outdoor environments).

The largest number of construction-related heavy truck trips is anticipated to occur during paving for the residential site, which would result in 42 one-way heavy truck trips per day. This equates to approximately 5 trips per hour over an eight-hour construction workday. Five additional heavy truck trips per hour (during the a.m. peak hour) were assumed to travel on Felicita Road, Brotherton Road, Miller Avenue, and Citracado Parkway, the potential haul routes from the project site to I-15. In addition, to be conservative, the highest number of worker commute trips (109 trips) were assumed to travel during the peak hour.

Traffic noise levels were calculated in CadnaA for the receivers shown in Figure 4.9-1 with existing traffic volumes and existing plus project construction traffic volumes. The 2025 traffic volumes for I-15 were used to determine the existing noise levels since the project is expected to commence construction in 2026 (SANDAG 2023). The results are shown below in Table 4.9-7*, Off-site Construction Traffic Noise Levels*.

Table 4.9-7
OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Receiver	Traffic Noise Exposure (L_{EQ}) – Peak Hour			Perceptible Change? (> 3 dBA)
	Existing (No Project)	Existing Plus Construction Traffic (2025)	Change from Existing	
R1	67.8	68.4	+0.6	No
R2	71.8	71.9	+0.1	No
R3	73.1	73.1	+0.0	No
R4	66.5	66.9	+0.4	No
R5	66.2	66.3	+0.1	No
R6	69.8	69.8	+0.0	No
R7	64.3	65.2	+0.9	No
R8	69.7	69.8	+0.1	No

Source CadnaA
L_{EQ} = equivalent sound level

As shown, the maximum increase in noise levels would be 0.9 dBA L_{EQ}, which is not perceptible (the change from existing noise level would be less than 3 dBA) compared to existing noise levels. In addition, increased noise levels from construction trips would be temporary.

Operational Noise

Operational On-site Noise Generation

The primary source of operational noise generated on the project site would be from building HVAC systems. The combined noise of all project HVAC systems operating concurrently at night would be significant if the resulting noise would exceed the City Municipal Code standard of 45 dBA received at residential property lines.

As described in Section 4.9.4.3, the project is anticipated to include 276 Carrier model 38BRC-024-34 2-ton split system HVAC units for the residential buildings, and six Carrier 50PG03-14 12.5-ton HVAC package units for the church building, all mounted on building rooftops behind parapet walls. These units were modeled in CadnaA as described in Section 4.9.4.3 and the resulting noise levels were calculated at heights of five feet above the ground level to approximate human hearing. As described in Section 4.9.1.1 above, noise decreases over distance, meaning that the noise levels produced by the project's HVAC units are not the same noise levels perceived by nearby receptors. As shown in Table 4.9-8, *Off-site HVAC Noise*, the combined project HVAC systems would not result in noise levels exceeding the City's most restrictive standard of 45 dBA L_{EQ} measured at residential property lines during the nighttime hours near the project site. Therefore, the project would not conflict with the residential zone property line limit of 45 dBA L_{EQ} during the nighttime hours.

Table 4.9-8
OFF-SITE HVAC NOISE

Receiver	Combined Project HVAC Noise (dBA L_{EQ})	City Nighttime Standard (dBA L_{EQ})	Exceed Standard?
R1	35.0	45	*No*
R2	36.2	45	*No*
R3	37.2	45	*No*
R4	39.9	45	*No*
R5	34.8	45	*No*
R6	38.1	45	*No*

Source: CadnaA; Standard: City Municipal Code Section 17-229
dBA = A weighted decibels; L_{EQ} = equivalent sound level

Operational Off-site Transportation Noise Generation

Traffic noise levels were calculated in CadnaA at receivers located at NSLUs surrounding the project site (refer to Figure 4.9-1) for Existing and Existing Plus Project conditions for comparison with the City's allowable incremental increase in traffic noise (refer to Table 4.9-2). Table 4.9-9, *Off-site Traffic Noise Levels*, provides the modeled traffic noise level under each condition for comparison with the City's standard based on the modeled existing condition. Existing ambient noise is the calculated 2025 traffic noise level without the addition of project-related traffic.

Table 4.9-9
OFF-SITE TRAFFIC NOISE LEVELS

Receiver	Traffic Noise Exposure (L_{DN})				Exceed Allowable Increase?
	Existing (No Project)	Allowable Noise Increment[1]	Existing Plus Project (2025)	Change from Existing	
R1	68	+1	68	+0	No
R2	72	+0	72	+0	No
R3	73	+0	73	+0	No
R4	67	+1	67	+0	No
R5	66	+1	66	+0	No
R6	70	+1	70	+0	No

Receiver	Traffic Noise Exposure (L_{DN})				Exceed Allowable Increase?
	Existing (No Project)	Allowable Noise Increment[1]	Existing Plus Project (2025)	Change from Existing	
R7	64	+1	64	+0	No
R8	69	+1	69	+0	No

Source: HELIX 2025

L_{DN} = day-night sound level

[1] Allowable noise increase over existing ambient noise from City General Plan Figure VI-14 (City 2012).

The maximum noise increase due to the addition of project traffic to streets in the area would be 0.2 dBA at receiver R7 (on Miller Avenue). As shown in Table 4.9-10, noise levels would not increase more than the City's allowable noise increment.

Level of Significance Prior to Mitigation

The addition of project construction traffic would not result in a perceptible increase in ambient traffic noise levels. The calculated one-hour project construction equipment noise levels would be less than the City limit of 75 dBA measured at nearby NSLUs. The calculated project operational noise from on-site building HVAC systems would not exceed the City nighttime standards of 45 dBA L_{EQ} measured at nearby NSLUs. The increase in traffic noise due to the addition of project traffic to area streets would not exceed the City's allowable incremental increase for residential land uses and would not be perceptible to the human ear. Therefore, the project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project exceeding standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The impact would be less than significant.

Mitigation Measures

No significant noise impact related to excessive noise levels would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to ambient noise levels would remain less than significant.

4.9.5.2 Vibration

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

Impact Discussion

Construction Vibration

Potentially significant impacts would occur if construction of the project would result in vibration which would exceed 80 VdB for residences and buildings where people normally sleep or exceed the 90 VdB thresholds for potential damage to buildings extremely susceptible to vibration damage.

The equipment with the greatest potential for vibration generation during project construction would be a vibratory roller, which may be used for compaction of soil beneath building foundations and could be used within 70 feet of the closest off-site residence north of the project site. Most usage of a vibratory roller, however, would occur at distances greater than 70 feet from any single residence due to the mobile nature of its use across the project site. A vibratory roller would create approximately 0.210 inch per second PPV at a distance of 25 feet (FTA 2018). A 0.210 inch per second PPV vibration level would equal 0.045 inch per second PPV, or 81 VdB at a distance of 70 feet[1]. This would be lower than the conservative structural damage impact threshold for buildings extremely susceptible to vibration damage of 90 VdB (0.12 inch per second PPV), but higher than the 80 VdB City's vibration annoyance impact criteria for infrequent events for Category 2 land uses (residences).

Operational Vibration

Land uses that may generate substantial ground-borne operational vibrations include heavy industrial or mining operations that require the use of vibratory equipment. The project would not include equipment that would generate substantial vibration.

Level of Significance Prior to Mitigation

Vibrations from the use of vibratory rollers during project construction could exceed the City standard of 80 VdB for disturbance of residents. Once operational, the project would not be a substantial source of vibration. Long-term operation of the project would not be a source of substantial ground-borne vibration. The impact would be potentially significant.

Mitigation Measures

NOI-1 Vibratory Roller Usage Limits. Vibratory rollers shall be used in static mode only (no vibrations) when operating within 80 feet of an occupied residential building, as shown in Figure 4.9-2, *Vibratory Roller Static Mode Usage Area*, of this EIR. The contractor shall specify vibratory roller operating mode restrictions on all demolition, grading, and construction permits.

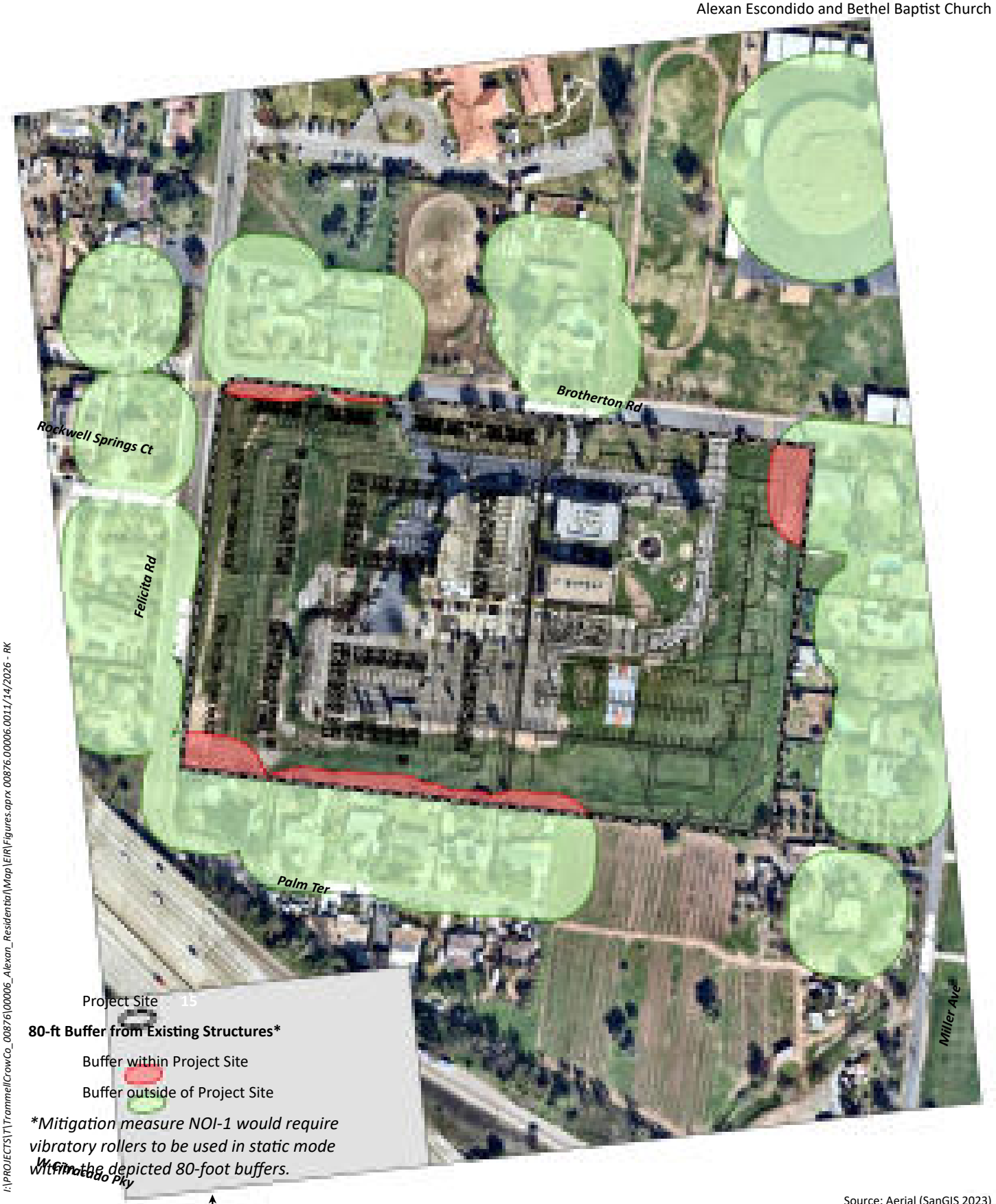
Level of Significance After Mitigation

With implementation of mitigation measure NOI-1, the project would not result in the generation of excessive ground-borne vibration levels. The impact would be less than significant with mitigation incorporated.

4.9.5.3 Airport Noise Exposure

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

[1] Equipment PPV = Reference PPV * $(25/D)^n$ (inches per second), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.5. L_V = Reference L_V – 30*log (D/25) (VdB), where Reference L_V is L_V at 25 feet and D is distance from equipment to the receiver in feet. Formulas from FTA 2018.



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Figures.aprx 00876.00006.0011/14/2026 - RK

Source: Aerial (SanGIS 2023)

HELIX

Vibratory Roller Static Mode Usage Area

Figure 4.9-2

Impact Discussion

The nearest airports to the project site are the Ramona Airport, located approximately 10 miles to the southeast, and the McClellan-Palomar Airport, located approximately 12 miles to the west. At these distances, the project may be subject to some occasional, distant aircraft noise but would not be exposed to excessive noise levels associated with airport operations.

Level of Significance Prior to Mitigation

Implementation of the project would not result in exposure of people to excessive airport noise levels and impacts would be less than significant.

Mitigation Measures

No significant noise impact related to airports would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. Impacts related to aircraft noise would remain less than significant.

This page intentionally left blank

4.10 Population and Housing

This section addresses the potential impacts related to population and housing associated with implementation of the proposed project. This section considers population and housing characteristics in the area and discusses project consistency with regional growth projections. This section also identifies applicable state and local regulations, including the City of Escondido General Plan.

4.10.1 Existing Conditions

This section provides background information regarding population and housing forecasts for the City based upon demographic information from SANDAG.

4.10.1.1 Population

The total population within the City as of 2020 was 151,038 (City 2022). Based on growth projections provided by the Series 14: Regional Growth Forecast prepared by SANDAG, it is estimated that the City's population growth will reach 165,127 by 2025, 169,922 by 2035, and 174,398 persons by 2050 (SANDAG 2021).

4.10.1.2 Housing

In 2022, a total of 49,998 housing units were located within the City. The housing stock comprises approximately 56.6 percent single-family units, 35.6 percent multi-family units, and 7.7 percent mobile homes (City 2021). Based on the Series 14: Regional Growth Forecast, the City is expected to have 54,910 housing units by 2025, 58,990 units by 2035, and 60,618 units by 2050 (SANDAG 2021).

4.10.1.3 Project Site

Bethel Baptist Church has occupied the proposed project site since 1976, and as a result, the project site does not currently support residential uses or a residential population.

The project site is currently designated PO in the City of Escondido General Plan and zoned R-E according to the City's zoning map.

The surrounding land uses are primarily residential. Parcels to the north and east of the project site are designated PO and S and zoned R-E and R-1. Parcels to the south are designated PO and zoned R-E. Parcels to the west are designated E2 and zoned R-E. High-density housing and urban development land uses are located further north and east of the project site.

4.10.2 Regulatory Framework

4.10.2.1 State Regulations

California Planning and Zoning Law

The legal framework within which California counties and cities exercise local planning and land use functions is provided in the California Planning and Zoning Law (Sections 65000 through 66499.58 of the California Government Code). Under that law, each county and city must adopt a comprehensive, long-term general plan. The law gives counties and cities wide latitude in how a jurisdiction may create a

general plan, but there are fundamental requirements that must be met. The requirements include seven mandatory elements described in the Government Code. Each element must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and implementation measures. Once the general plan of a county or city is adopted, it should be construed as a dynamic document, for which adaptability is a key component. Each jurisdiction frequently reviews its general plan for consistency and to ensure it addresses growth-related issues in a comprehensive manner. State law allows up to four general plan amendments per general plan element per year, so each jurisdiction can make changes as justified.

California Building Standards Code

In 2001, California consolidated the Uniform Building, Plumbing, Electrical, and Mechanical codes into the California Building Standards Code, which is contained in Title 24 of the California Code of Regulations. The California Building Standards Code contains 11 parts: Electrical Code, Plumbing Code, Administrative Code, Mechanical Code, Energy Code, Residential Building Code, Historical Building Code, Fire Code, Existing Building Code, Green Building Standards Code, and the Reference Standards Code. These codes promote public health and safety and ensure that safe and decent housing is constructed in the city.

Senate Bill 375

SB 375 (codified in the Government Code and Public Resources Code) took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires metropolitan planning organizations to incorporate a SCS in their RTPs that will achieve GHG emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.

Regional Housing Needs Assessment

A RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of a general plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.

California Density Bonus Law

Originally enacted in 1979, California's Density Bonus Law (Government Code Sections 65915 through 65918) allows a developer to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan. In exchange for the increased density, a certain number of the new affordable dwelling units must be reserved at below market rate. Qualifying applicants can also receive reductions in required development standards. Greater benefits are available for projects that reach higher percentages of affordability. Besides granting rights to housing and mixed-used developments to increase density, the law provides three provisions that require local governments to grant qualifying projects (1) incentives (or concessions) that provide cost reductions; (2) waivers of development standards that would

physically preclude the development of a project at the density permitted and with the incentives granted; and (3) reductions in parking requirements. The applicant proposes to utilize the Density Bonus Law.

4.10.2.2 Regional and Local Regulations

San Diego Association of Governments

SANDAG is a public agency, composed of 18 cities and the County of San Diego, which builds strategic plans guiding the San Diego region in land use, growth, economics, and the environment. SANDAG also provides population and housing estimates for the region, which are based, in part, on local jurisdictional planning data and inform regional planning.

The SANDAG Regional Comprehensive Plan, adopted in 2004, provides a long-term planning framework for the San Diego region. The Regional Comprehensive Plan identified smart growth and sustainable development as important strategies to direct the region's future growth toward compact, mixed-use development in urbanized communities that already have existing and planned infrastructure, and then connecting those communities with a variety of transportation choices.

In 2011, SANDAG approved the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included a sustainable communities strategy, consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the CARB as required by the 2008 Sustainable Communities and Climate Protection Act. In 2010, CARB established targets for each region in California governed by a metropolitan planning organization. The RTP/SCS has since been incorporated into the Regional Plan, which is described below.

2025 Regional Plan

The 2025 Regional Plan (Regional Plan; SANDAG 2025) provides a framework for a long-range plan for transportation, land use, housing, and the environmental needs of the San Diego region. It provides a roadmap for how the region will develop over the next 25 years and how investments will be made in transportation infrastructure that provides more convenient and safe choices for getting around. It combines the RTP, and RCP. As such, the 2025 Regional Plan must comply with specific state and federal mandates, including an SCS per SB 375 that achieves GHG emission reduction targets set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process.

The 2025 Regional Plan envisions a sustainable and resilient future for the region and economy supported by a transportation network that is convenient, equitable, healthy, and safe. To accomplish this, the objectives of the Regional Plan include:

- Focus population and employment growth to protect sensitive habitat and natural resource areas.
- Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.

- Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.
- Provide transportation investments and a land use pattern that promotes social equity.
- Provide transportation investments and a land use pattern that improves air quality.
- Provide multimodal access to employment centers and key destinations for all communities.
- Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

The Regional Plan has a horizon year of 2050, and projects regional growth and the construction of transportation projects over this period.

Regional Growth Forecast

SANDAG estimates future population, housing, land use, and economic growth throughout San Diego County and its comprising cities, including the City of Escondido. The City is expected to experience a slightly higher growth rate for population and housing, and a lower employment growth rate when compared to the entire region of San Diego. It should also be noted that the 2050 Regional Growth Forecast is not intended to be an exact formula utilized to determine growth in the region and comprising jurisdictions; rather it should be utilized as a starting point for regional planning.

Regional Housing Needs Assessment

Based on a methodology that weighs a number of factors (i.e., projected population growth, employment, commute patterns, and available sites), SANDAG determined quantifiable needs for housing units in the region according to various income categories. In its final RHNA figures, SANDAG allocated 9,607 housing units to the Escondido area for the 2021– 2029 Housing Element Cycle (SANDAG 2020). Per the City of Escondido 2021-2029 Housing Element, overall, the City has the ability to accommodate at least 9,463 units on vacant and underutilized sites across the City. Of that total, 8,127 units are located in zones that allow at least 30 du/ac, indicating that they may accommodate lower-income units. Additionally, 5,821 of these high-density units are located on sites or on adjacent sites with cumulative areas between 0.5 and 10 acres, indicating that they may be counted toward the lower income capacity. While these sites meet the criteria for lower-income households, the City is assuming that 2,051 above-moderate units and 3,770 lower-income units could be accommodated on these high-density, correctly sized sites. With the adoption of expected Specific Plans currently under review, the City would have adequate residential capacity available to meet the City's RHNA for all income groups. Table 4.10-1, *City of Escondido Summary of RHNA Status*, summarizes the City's RHNA status.

Table 4.10-1
CITY OF ESCONDIDO SUMMARY OF RHNA STATUS

Site Category	Above Moderate	Moderate	Low	Very Low	Total
Units on Identified Sites	3,439	1,467	0	4,557	9,463
Approved and Under Construction Projects	1,357	90	155	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020
Accessory Dwelling Units	86	147	56	71	360
Total Identified Capacity	**5,531**	**1,704**	**582**	**4,628**	**12,445**
RHNA Allocation	4,967	1,527	1,249	1,864	9,607

Source: City 2021d

City of Escondido General Plan Housing Element

The City's Draft 2021-2029 Housing Element was recommended for approval by the Planning Commission in July 2021 and approved by the City Council in August 2021 (City 2021d). The City received public comment letters on the draft housing element and overall process, prior to the City Council initial adoption of the document on August 11, 2021. City staff reviewed received comment letters, including those submitted from the San Diego Housing Federation, Escondido Community Housing Coalition, Sierra Club North County Group, and Erik Felix and Laura Harper, as well as from California Department of Housing and Community Development (HCD). After the August 2021 City Council adoption, City staff met with each group listed to discuss how their comments may be integrated into the revised housing element document. Meetings with each group occurred between January and February of 2022. On April 15, 2022, the City posted the revised adopted Housing Element for a 30-day review period, prior to resubmittal to HCD. City staff presented the draft changes in a public meeting on May 10, 2022 to the City's Planning Commission and general public. HCD recommended the City move forward with adopting the revisions on January 20, 2023, and City adopted the housing element on March 22, 2023. Applicable goals and policies pertaining to population and housing include the following:

- **Housing Goal 1:** Plan for quality, managed, and sustainable growth**.**
- **Housing Policy 1.1:** Expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.
- **Housing Policy 1.2:** Housing projects shall fund all or a portion of public facilities and costs for providing municipal services directly related to the need created by the development. The amount must be proportional to the cost of the service or improvement to offset the impacts to public facilities, services, and operations.
- **Housing Policy 1.4:** Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.
- **Housing Policy 1.5:** Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.

- **Housing Policy 1.6:** Encourage creative residential developments and partnerships that result in desirable amenities and contribute to infrastructure needs.

- **Housing Policy 1.7:** Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed-Use Overlay areas.

- **Housing Policy 1.9:** Improve affordability by promoting sustainable housing practices that incorporate 'whole system' approach to siting, designing, and constructing housing that is integrated into the building site, consumes less water and improves water quality, reduces the use of energy and other resources, and minimizes its impact on the surrounding environment.

- **Housing Goal 2:** Provide a range of housing opportunities for all income groups and households with special needs.

- **Housing Policy 2.1:** Plan for adequate development potential to accommodate the regional share of housing for all income groups and promote equal access to resources and amenities.

- **Housing Policy 2.2:** Encourage new development to provide a range of housing by type, size, location, price, and tenure to provide a greater array of housing types.

4.10.3 Thresholds of Significance

Thresholds used to evaluate potential impacts related to population and housing are based on applicable criteria in CEQA Guidelines Appendix G. A significant population and housing impact would occur if implementation of the proposed 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); or

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

4.10.4 Methodology and Assumptions

The following analysis is based on demographic data provided by the City's General Plan Housing Element (City 2021d), the RHNA (City 2021d), and SANDAG (SANDAG 2020). The Housing Element and RHNA provide existing counts and future capacity for population and housing within the City. For both population and housing, proposed project increases are compared to City and regional data to determine project significance.

4.10.5 Project Impact Analysis

4.10.5.1 Unplanned Growth

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)?

Impact Discussion

Increases in population, housing, and employment are generally considered to be social or economic effects, as opposed to physical effects, which are the focus of CEQA analysis. There are circumstances where social and economic changes could indirectly cause physical environmental impacts or result in changes to environmental resources, such as air quality, traffic, or noise levels. In other situations, lead agencies may evaluate social or economic change related to a physical change in determining whether the physical change is significant (*CEQA Guidelines* Section 15131).

The approximately 14.83-acre project site is located in the southern portion of the City. Within the Escondido General Plan, the site is identified as PO, which does not allow residential uses. The project site is also zoned R-E, allowing single-family homes. Under existing land use controls, development would involve one- to three-story office buildings and supporting retail and service uses with a maximum floor space of approximately 1,291,995 SF; high-density housing would not be permitted. The project includes a General Plan Amendment to re-designate the project site from Planned Office to Urban V (up to 30/du/acre) with the final density to be 32.6 du/acre upon approval of the density bonus achieved through the provision of affordable housing on site as allowed by the California Density Bonus Law. A zone change would also be required to change the zoning from R-E to R-5-30. The project would be an infill project with the existing development surrounding the proposed project, most of which is residential.

Construction of the proposed project would represent a temporary increase in construction employment. Given the relatively common nature and scale of the construction associated with the proposed project, the demand for construction employment would likely be met within the existing and future labor market in the City and North County San Diego area. The size of the construction workforce would vary during the different stages of construction, but it is not expected that a substantial number of workers from outside the local area would relocate permanently.

Although the church development would construct two residential units in the eastern portion of the site, these would be used as temporary housing for traveling missionaries and would not contribute to population growth in the City. The proposed residential development would directly induce growth through the development of 258 multi-family residential dwelling units. This increase accounts for approximately three percent of the RHNA allocation identified in Table 4.10-1 and would not exceed the housing capacity of the City. According to the City's Housing Element, there is an average of 3.21 persons per household in Escondido (City 2023). Using this number, and assuming a net increase of 258 units on the project site, the project would increase the City's existing population of 151,038 (City 2022) by about 828 persons, to approximately 151,866, or by approximately one percent. This population increase would be very small and would not adversely affect the City or its services.

The SANDAG population growth forecasts rely, in part, on individual jurisdiction's planning documents, such as the County's and City's General Plan. According to SANDAG, Escondido's population is projected

to grow to 174,398 people by 2050, an increase of 23,360 from the 2020 population of 151,038. The population increase of 828 people as a result of the proposed project would account for 3.5 percent of SANDAG's projected population growth for the City, which would be very small and would not adversely affect the City or its services.

The proposed project would not indirectly induce a growth in population as no extension of infrastructure is proposed beyond what is required to adequately serve the project. The project would connect to existing utilities within Felicita Road and Brotherton Road including water, sewer, electricity and telecommunication services, and natural gas (if used). Additionally, the majority of the surrounding area is already developed.

Therefore, the proposed project would not directly or indirectly induce growth beyond current estimates and forecasts.

Level of Significance Prior to Mitigation

Population and housing impacts related to unplanned growth resulting from project implementation would be less than significant.

Mitigation Measures

No significant population and housing impacts related to unplanned growth would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to unplanned growth would remain less than significant.

4.10.5.2 Displacement

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

Impact Discussion

There are no existing residences on the project site. The site is currently developed with a church and associated parking that would be demolished as part of the project. As such, the project would not displace a substantial number of people or housing or necessitate the construction of replacement housing. On the contrary, the applicant proposes to construct 258 multi-family residential units to provide additional housing within the City. The environmental effects from constructing the proposed 258 units have been analyzed throughout this EIR. Therefore, the project would not reduce, but instead increase, the number of housing units within the City.

Level of Significance Prior to Mitigation

Population and housing impacts related to displacement of people or housing resulting from project implementation would be less than significant.

Mitigation Measures

No significant population and housing impacts related to displacement of people or housing would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to displacement of people or housing would remain less than significant.

This page intentionally left blank

4.11 Transportation

This section addresses the potential transportation- and traffic-related impacts associated with implementation of the proposed project. Since the size of the proposed new church building (24, 627 SF) would essentially be the same size as the existing church building (24,395 SF), the church development would not result in a net increase in traffic trips. Therefore, only the residential component of the project was included in the analysis of traffic effects. The analysis is based on an LMA (Linscott, Law, & Greenspan, Engineers [LLG] 2025), which is included as Appendix J to the EIR.

The LMA analyzes the proposed project's impacts utilizing both an LOS metric and a VMT metric. As discussed in this section and in Appendix J, the LOS analysis is provided as a means to consider the project's consistency with programs addressing the circulation system, including the City of Escondido General Plan, and otherwise is provided for informational purposes only. According to Public Resources Code 21099(b)(2), following certification of CEQA Guidelines Section 15064.3, which occurred in December 2018, "automobile delay, as described solely by [LOS] or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to" CEQA. Rather, and as provided in CEQA Guidelines Section 15064.3, VMT is now considered the most appropriate measure of transportation impacts, and the City has elected to use the provisions of CEQA Guidelines Section 15064.3 for this analysis herein. As such, the analysis presented below utilizes VMT to determine project impacts related to transportation facility operations under CEQA.

4.11.1 Existing Conditions

4.11.1.1 Transportation Analysis Metrics

Vehicle Miles Traveled

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (e.g., VMT/capita). VMT tends to increase as land use density decreases and travel becomes more reliant on the use of the automobile due to the long distances between origins and destinations. VMT can also serve as a proxy for impacts related to energy use, air pollution emissions, GHG emissions, safety, and roadway maintenance. The relationship between VMT and energy or emissions is based on fuel consumption. The traditional use of VMT in environmental impact analysis is to estimate mobile air pollution emissions, GHGs, and energy consumption.

Level of Service

LOS is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments.

4.11.1.2 Roadway Network

The roads immediately bordering the project site are Brotherton Road to the north and Felicita Road to the west. The following section describes the existing roadway network in the transportation analysis study area.

Brotherton Road is an unclassified roadway in the City of Escondido General Plan Circulation Element. It is currently constructed as a two-lane undivided roadway between Felicita Road and Centre City Parkway. Brotherton Road was widened to the City standard cross-section (on the south side only) during construction of Bethel Baptist Church. Sidewalks are provided intermittently along Brotherton Road between Felicita Road and Centre City Parkway. Bike lanes are not provided. The curb-to-curb width varies between 24 feet and 42 feet wide. The posted speed limit is 25 miles per hour (mph).

Citracado Parkway is located south of the project site. The City of Escondido General Plan Circulation Element classifies it as a Major Road between the I-15 southbound off-ramp and the I-15 northbound ramps and a Collector between I-15 northbound ramps and Centre City Parkway. Citracado Parkway is currently constructed as a four-lane divided roadway between the I-15 southbound off-ramp and I-15 northbound ramps, a three-lane divided roadway between I-15 northbound ramps and Miller Avenue, and a two-lane undivided roadway between Miller Avenue and Centre City Parkway. Citracado Parkway transitions to Gamble Lane west of I-15 and does not extend beyond one mile west of this freeway. The Circulation Element shows a planned future connection to Citracado Parkway east of West Valley Parkway. Within the study area, sidewalks are provided between the I-15 southbound off-ramp and Felicita Road on the south side only, between Felicita Road and Miller Avenue on the north side only, and between Miller Avenue and Alexander Drive on the south side only. Bike lanes are not provided. The curb-to-curb width varies between 42 and 102 feet. The posted speed limit is 30 mph east of the I-15 ramps and 25 mph west of the I-15 ramps.

Felicita Road is located immediately to the west of the project site and is classified as a four-lane Collector between Brotherton Road and Citracado Parkway in the Circulation Element. It is currently constructed as a two-lane undivided roadway with a two-way left-turn lane between Brotherton Road and Citracado Parkway. Within the study area, sidewalks are provided between Brotherton Road and Gamble Lane/Citracado Parkway on the west side only and between Palm Terrace and Citracado Parkway on the east side. Class II bike lanes are provided on both sides. The curb-to-curb width is generally 42 to 66 feet between Brotherton Road and Citracado Parkway. The posted speed limit is 40 mph.

Miller Avenue is located to the east of the project site and is listed as an unclassified roadway in the Circulation Element. It is currently constructed as a two-lane undivided roadway between Brotherton Road and Citracado Parkway. Within the vicinity of the project site, sidewalks and bike lanes are not provided. The curb-to-curb width is generally 22 to 32 feet between Brotherton Road and Citracado Parkway. The posted speed limit is 25 mph.

Centre City Parkway is located to the east of the project site and is classified as a Super Major Road between Brotherton Road and Citracado Parkway in the Circulation Element. It is currently constructed as a four-lane divided roadway between Brotherton Road and Citracado Parkway. Within the study area, sidewalks are not provided. Class II bike lanes are provided on both sides. The curb-to-curb width is generally 90 feet between Brotherton Road and Citracado Parkway. There is no posted speed limit within this roadway. However, given its roadway classification and its characteristics, it has a prima facie speed limit of 65 mph.

4.11.1.3 Public Transit Network

The North County Transit District (NCTD) provides bus transit services in the project vicinity. There are no bus routes that operate along the streets within the study area. The nearest bus stop is located approximately one mile away from the project site to the northeast on the northwest corner of the South Escondido Boulevard and West Felicita Avenue intersection and serves bus route 350. Route 350 runs between the Escondido Transit Center, located 2.2 miles to the north, and the Del Lago Transit Station, located 2.7 miles to the south.

NCTD also operates a light rail transit system, the SPRINTER, which stops at the Escondido Transit Center. The SPRINTER extends 22 miles along the SR 78 corridor and serves 15 stations between Escondido and Oceanside. The closest SPRINTER station to the project site is located at the Escondido Transit Center.

4.11.1.4 Pedestrian and Bicycle Facilities

Sidewalks are located intermittently along the roads in the immediate vicinity of the project site, including Brotherton Road to the north, Citracado Parkway to the south, and Felicita Road to the west. There are no sidewalks located along Miller Avenue, which is located to the east of the project site.

Currently, there is a Class II bike lane along Felicita Road immediately east of the project site, which connects to another Class II bike lane along Centre City Parkway. There are presently no other bicycle facilities provided along the remaining street segments in the study area. Planned bicycle facilities include a Class II bike lane along Centre City Parkway, a Class III bike lane along Citracado Parkway, west of Felicita Road, and a Class III bike route along Citracado Parkway, east of Felicita Road.

4.11.1.5 Level of Service

The General Plan Mobility and Infrastructure Element, as well as the associated City of Escondido Traffic Impact Analysis Guidelines (TIAG; City 2021e), set goals for vehicular LOS operations for City roadway segments and intersections on the basis of the Quality of Life Standards. Specifically, the Mobility and Infrastructure Element streets and intersections are to be planned and developed to achieve a minimum LOS C. However, it is recognized that LOS C may not be feasible in all areas at all times and LOS D may be acceptable in certain areas, such as in the Downtown Specific Plan area. The Quality of Life standard specifically states "[d]ue to physical design characteristics, implementation of pedestrian-oriented 'smart growth' and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city." The City Guidelines also set forth guidance that the LOS at intersections should be LOS D or better and provide guidance for establishing the study area. Based on that guidance, the study area examined in the LMA for the purposes of General Plan consistency analysis includes 12 intersections and 14 street segments.

As shown in Table 4.11-1, *Existing Intersection Operations*, all analyzed study area intersections currently operate at acceptable LOS D or better, with the exception of Citracado Parkway/Felicita Road and the Citracado Parkway/I-15 Northbound Ramps. Two of the intersections included in the LMA are proposed project driveways (one along Felicita Road and one along Brotherton Road) that currently do not exist and another in the LMA (Citracado Parkway/I-15 Southbound Ramps) is a no control type intersection because there are no stop or yield signs for any movement and thus are not included in this description of existing conditions.

Table 4.11-1
EXISTING INTERSECTION OPERATIONS

Intersection	Existing LOS AM	Existing LOS PM
Brotherton Road/Felicita Road	B	C
Brotherton Road/Miller Avenue	C	B
Brotherton Road/Centre City Parkway	C	D
Gamble Lane/I-15 Southbound Off-Ramp	D	D
Citracado Parkway/Felicita Road	E	D
Citracado Parkway/I-15 Southbound On-Ramp		
Citracado Parkway/I-15 Northbound Ramps	E	D
Citracado Parkway/Miller Avenue	D	C
Citracado Parkway/Alexander Drive	A	A
Citracado Parkway/Centre City Parkway	B	D

Source: LLG 2025
LOS = Level of Service

As shown in Table 4.11-2, *Existing Street Segment Operations*, all of the analyzed street segments in the study area currently operate at LOS C or better with the exception of the following:

- Felicita Road between Brotherton Road and Project Driveway #2 (LOS D)
- Felicita Road between Project Driveway #2 and Citracado Parkway (LOS D)
- Centre City Parkway between Brotherton Road and Citracado Parkway (LOS D)

Table 4.11-2
EXISTING STREET SEGMENT OPERATIONS

Street Segment	Functional Classification	LOS
Brotherton Road		
Felicita Road to Project Driveway #1	Unclassified	A
Project Driveway #1 to Miller Avenue	Unclassified	A
Miller Avenue to Alexander Drive	Unclassified	A
Alexander Drive to Centre City Parkway	Unclassified	A
Citracado Parkway		
I-15 Southbound Off-Ramp to Felicita Road	4-Lane Major Road	A
Felicita Road to I-15 Southbound On-Ramp	4-Lane Major Road	A
I-15 Southbound On-Ramp to I-15 Northbound Ramps	4-Lane Major Road	A
I-15 Northbound Ramps to Miller Avenue	2-Lane Collector	B
Miller Avenue to Alexander Drive	2-Lane Collector	A
Alexander Drive to Centre City Parkway	2-Lane Collector	A
Felicita Road		
Brotherton Road to Project Driveway #2	2-Lane Local Collector	D
Project Driveway #2 to Citracado Parkway	2-Lane Local Collector	D
Miller Avenue		
Brotherton Road to Citracado Parkway	Unclassified	A
Centre City Parkway		
Brotherton Road to Citracado Parkway	4-Lane Major Road	D

Source: LLG 2025
LOS = Level of Service

4.11.1.6 Vehicle Miles Traveled

VMT is defined as a measurement of miles traveled within a specified region for a specified time period and is a measure of network use or efficiency. There are multiple ways to express VMT, although generally VMT is calculated by multiplying all vehicle trips generated by a project by their associated trip lengths, or by multiplying traffic volumes on roadway links by the associated trip distance of each link. VMT accounts for two-way (round trip) travel and is often estimated for a typical weekday for the purposes of measuring transportation impacts.

As discussed in the LMA (LLG 2025), the project site is not located in a VMT efficient area (15 percent or more below the base year average household VMT per capita) based on the applicable location-based screening map produced by the San Diego Association of Governments SANDAG. For San Diego County, the average regional VMT per capita is 18.9 miles.

4.11.2 Regulatory Framework

4.11.2.1 Federal Regulations

Highway Capacity Manual

The Highway Capacity Manual, prepared by the federal Transportation Research Board, is the result of a collaborative multiagency effort between the Transportation Research Board, Federal Highway Administration, and American Association of State Highway and Transportation Officials. The Highway Capacity Manual 6th Edition contains concepts, guidelines, and procedures for computing the capacity and quality of service of various highway facilities including freeways, signalized and unsignalized intersections, rural highways, and the effects of transit, pedestrian, and bicycles on the performance of these systems.

Title 23, Code of Federal Regulations

Code of Federal Regulations Title 23, Section 450.220, “Highways,” requires each state to carry out a continuing, comprehensive, and intermodal statewide transportation planning process. This planning process must include development of a statewide transportation plan and transportation improvement program that facilitates the efficient, economical movement of people and goods in all areas of the state. In the San Diego region, compliance with this federal regulation is provided though SANDAG’s 2025 Regional Plan (SANDAG 2025).

4.11.2.2 State Regulations

Statewide Transportation Improvement Program

As indicated above, “Highways” in the Code of Federal Regulations, requires statewide transportation plans. Pursuant to this requirement, California adopted the California Statewide Transportation Improvement Program (STIP). The STIP is prepared by Caltrans in cooperation with the Metropolitan Planning Organizations (MPO) and the regional transportation planning agencies. In San Diego County, the MPO and regional transportation planning agency is SANDAG. The STIP contains capital and non-capital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the CFR, including federally funded projects.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which changed the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts under CEQA. Previously, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments. That delay is often measured using a metric known as "level of service," or LOS. Under SB 743, the Legislature directed that the focus of transportation analysis shift from driver delay to the reduction of GHG emissions, the creation of multimodal networks, and the promotion of a mix of land uses. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts for transit-oriented infill projects, and authorized OPR to recommend such an alternative for the analysis of transportation-related impacts associated with all land use projects under CEQA.

SB 743 directed that the alternative criteria must promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. In response to the directive, OPR elected to utilize VMT as the metric upon which a project's transportation-related impacts would be assessed under CEQA. VMT is defined as a measurement of miles traveled by vehicles within a specified region for a specified period and is a measure of network use or efficiency.

Since OPR determination to utilize VMT as the metric going forward, the state has approved CEQA Guidelines Section 15064.3, which implements that change. In addition to issue of the revised Guidelines, to assist CEQA practitioners in complying with the new guideline requirements, OPR also issued the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which provides recommendations for conducting VMT analysis in compliance with the new Guidelines. To comply with the new legislation, The City has adopted VMT thresholds as part of their Transportation Impact Analysis Guidelines (City 2021d).

4.11.2.3 Regional/Local Regulations

2025 Regional Plan

The 2025 Regional Plan (SANDAG 2025) is a comprehensive plan adopted by SANDAG that provides the framework for a is a long-range plan for transportation, land use, housing, and the environmental needs of the San Diego region. It provides a roadmap for how the region will develop over the next 25 years and how investments will be made in transportation infrastructure that provides more convenient and safe choices for getting around. It combines the Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS), and Regional Comprehensive Plan (RCP). As such, the 2025 Regional Plan must comply with specific state and federal mandates, including an SCS per SB 375 that achieves GHG emission reduction targets set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process.

The 2025 Regional Plan envisions a sustainable and resilient future for the region and economy supported by a transportation network that is convenient, equitable, healthy, and safe. To accomplish this, the objectives of the Regional Plan include:

- Focus population and employment growth to protect sensitive habitat and natural resource areas.
- Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.
- Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.
- Provide transportation investments and a land use pattern that promotes social equity.
- Provide transportation investments and a land use pattern that improves air quality.
- Provide multimodal access to employment centers and key destinations for all communities.
- Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

The 2025 Regional Plan has a horizon year of 2050, and projects regional growth and the construction of transportation projects over this period. The project vicinity is identified as being in a microtransit area.

City of Escondido General Plan Mobility and Infrastructure Element

The City of Escondido General Plan's Mobility and Infrastructure Element introduces planning tools essential for achieving the community's transportation and utility goals and policies with the intent of providing a sustainable system to serve residents and businesses. The Community Protection Element contains policies for the protection of people and property from natural and man-made hazards, including those that involve some level of transportation planning in the event of an emergency. Relevant goals and policies from these General Plan elements are listed below.

Mobility and Infrastructure Element

- **Regional Transportation Planning Goal 1**: An accessible, safe, convenient, and integrated multimodal network that connects all users and moves goods and people within the community and region efficiently.
- **Complete Streets Policy 2.1**: Ensure that the existing and future transportation system is interconnected and serves multiple modes of travel, such as walking, biking, transit, and driving for safe and convenient travel.
- **Complete Streets Policy 2.2:** Provide a safe, efficient, and accessible transportation network that meets the needs of users of all ages including seniors, children, disabled persons, and adults.
- **Complete Streets Policy 2.4**: Evaluate access, safety, and convenience of various transportation modes for every project involving the following eight user groups: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.
- **Pedestrian Network Policy 3.3:** Maintain a pedestrian environment that is accessible to all and that is safe, attractive, and encourages walking.

- **Pedestrian Network Policy 3.4:** Preserve and enhance pedestrian connectivity within existing neighborhoods via the Escondido Creek trail, sidewalks, and trails, and require a pedestrian network in new developments that provides efficient and well-designed connections to adjacent land uses, commercial districts, schools, and parks.

- **Pedestrian Network Policy 3.5:** Promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; orienting development toward the street; employing traffic calming measures; and enforcing vehicle speeds on both residential and arterial streets.

- **Bicycle Network Policy 4.3:** Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.

- **Transit System Policy 5.8:** Require that new developments incorporate transit-supporting facilities into the project design, where appropriate. Policy 5.9: Construct, when appropriate, transit facilities such as bus pullouts on Prime Arterials, Major Roads, and Collector streets.

- **Street Network Policy 7.1:** Plan, design, and regulate roadways in accordance with the street classification in the Circulation Element Diagram.

- **Street Network Policy 7.3:** Strive to maintain LOS C or better throughout the city except for within the urban core. Establish LOS D as the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented "smart growth" and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city.

- **Street Network Policy 7.4:** Provide adequate traffic safety measures on all new roadways and strive to provide adequate traffic safety measures on existing roadways (subject to fiscal and environmental considerations). These measures may include, but not be limited to, appropriate levels of maintenance, proper street design, traffic control devices (signs, signals, striping), street lighting, and coordination with the school districts and other agencies.

- **Street Network Policy 7.6:** Ensure that identified mobility system improvements are developed in a timely manner to meet the needs of the community.

- **Street Network Policy 7.7:** Require new development projects to analyze local traffic impacts, and construct and implement the improvements required for that development.

- **Street Network Policy 7.8:** Require new development projects to analyze traffic impacts on the regional transportation system, and pay a fair-share contribution to regional transportation improvements.

- **Street Network Policy 7.11:** Enhance the safety and efficiency of accessing the public street network from private properties by:

- Controlling driveway access locations on Prime Arterials and Major Roads;
- Installing medians and access controls on Collector Roads and higher classifications;
- Maintaining minimum distances from intersections for accessing Prime Arterials, Major Roads, and Collector streets;
- Consolidating driveway access; and
- Encouraging interconnected parking lots.

- **Parking Policy 8.1:** Ensure off-street and on-street parking is adequate, considering access to transit facilities and mix of uses in the surrounding area.

Community Protection Element

- **Disaster Preparedness and Emergency Response Goal 1:** A prepared and responsive community in the event of disasters and emergencies.

- **Emergency Services Policy 1.6:** Require minimum road and driveway widths and clearances around structures consistent with local and State requirements to ensure emergency access.

- **Fire Protection Policy 2.8:** Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow requirements in the review of all development applications to minimize fire hazards.

- **Fire Protection Policy 2.12:** Maintain close coordination between planned roadway and other circulation improvements in the city to assure adequate levels of service and response times to all areas of the community.

City of Escondido Bicycle Master Plan

The City of Escondido Bicycle Master Plan (City 2012c) identifies existing circulation patterns for bicyclists, problem areas and safety concerns, and develops a master system to further the implementation of bikeways throughout Escondido. The Bicycle Master Plan includes Caltrans bikeway standards, conceptual designs for bicycle paths and trails, maps of existing and proposed bicycle facilities, a phasing plan for improvements, funding sources, and an implementation plan. The plan identifies a bicycle facility network, both on the road (Class II and III) and offroad (Class I). Upon full implementation, the plan will create a comprehensive network of bicycle lanes, routes, and paths.

City of Escondido Municipal Code – Chapter 23

Chapter 23 of the City's Municipal Code establishes street and sidewalk standards for areas within the city. This chapter defines standards for public dedication of rights-of-way, arrangement for relocation of public utility facilities within sidewalks or streets, and issuance of building permits for construction in setback areas and rights-of-way. Additionally, this chapter identifies standards for locating pumps, tanks, and fire hydrants within sidewalks, streets, or rights-of-way.

City of Escondido Traffic Impact Analysis Guidelines

Consistent with the requirement of Policies 7.7 and 7.8 of the General Plan Mobility and Infrastructure Element which require that new development projects analyze both local traffic impacts, as well as the project's impacts on the regional transportation system, the City has developed the TIAG (City 2021e). The purpose of the TIAG (and a Transportation Impact Analysis) is to inform land use and development decisions by providing qualitative and quantitative criteria to assess the transportation system within the vicinity of a land development project. The City's TIAG states that segments or intersections operating at LOS D, E or F are considered to operate unacceptably, and improvement measures shall be provided if a project adds more than 2 seconds of delay or more than 0.02 to the volume to capacity (v/c) ratio. The TIAG also establishes the contents and procedures for preparing a Transportation Impact Analysis in the City of Escondido. The City TIAG is a comprehensive manual for both CEQA VMT analysis and discretionary/entitlement non-CEQA LMA to ensure compliance with the City's General Plan. The TIAG provides guidance for the two elements of transportation analyses needed to comprehensively assess the potential effects from new development to the City's roadway and mobility system.

City of Escondido VMT Exchange Program

The City has adopted a VMT Exchange Program to provide programmatic mitigation options to projects with transportation VMT impacts. The VMT Exchange Program provides a list of community-based transportation projects and programs that can be selected to be full or partial mitigation for a transportation VMT impact.

4.11.3 Thresholds of Significance

Thresholds used to evaluate potential transportation impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant transportation impact could occur if implementation of the proposed project would:

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

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);

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

d. Result in inadequate emergency access.

4.11.4 Methodology and Assumptions

4.11.4.1 VMT Analysis

The City's TIAG, adopted on April 21, 2021, sets forth the methodology for conducting a transportation study and a CEQA VMT analysis. The VMT analysis contained in the LMA is based on the TIAG.

The requirements to prepare a detailed transportation VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. A project that meets at least one

of the following screening criteria below would be presumed to have a less than significant VMT impact due to project characteristics and/or location:

- Small residential and employment projects
- Projects located in a transit-accessible area
- Projects in a VMT-efficient area
- Locally serving retail projects
- Locally serving public facilities
- Redevelopment projects with lower total VMT

The proposed project does not meet any of the screening criteria which would exempt a project from preparation of a VMT analysis.

In general, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT. According to the City's TIAG, VMT/capita is the appropriate metric to analyze for residential projects (such as the proposed project). VMT/capita is established by summing up total daily VMT generated by residents of a geographic area and dividing by the population of that geographic area. Total daily VMT includes all trip tours made by residents: home-based and non-home-based trip tours (i.e., all VMT for a resident for the entire day regardless of trip purpose or origin/destination). To analyze the VMT/capita for a proposed project, total daily VMT generated by project residents is divided by the project resident population.

Projects that do not meet screening criteria listed in the TIAG must include a detailed evaluation of the VMT generated by the project. The significance threshold for residential projects is 15 percent below the regional average VMT/capita. The average VMT/capita for residential projects in the San Diego region is 18.9 and 15 percent below 18.9 is 16.0.

4.11.4.2 Local Mobility/LOS Analysis

An LMA is required by the City to assess transportation effects and ensure orderly development, public safety, adequate infrastructure, and consistency with the General Plan. The LMA evaluates the effects of a proposed development project on traffic operations and safety for the roadway network in the proximate area of the project.

Per the requirements of the TIAG, the following scenarios were evaluated by the LMA/LOS Analysis:

- Existing Conditions
- Existing Plus Project Conditions
- Near Term Conditions (includes near term planned and approved projects)
- Near Term Plus Project Conditions
- Long-Term (future year) Conditions
- Long-Term (future year) Plus Project Conditions

Signalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 19 of the Highway Capacity Manual (HCM) 6th Edition, with the assistance of the Synchro (version 11) computer software. The delay values (represented in seconds) were qualified with a corresponding intersection LOS. Unsignalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay and LOS was determined based upon the procedures found in Chapters 20 and 21 of the HCM 6th Edition, with the assistance of the Synchro (version 11) computer software. Street segment analysis is based upon the comparison of ADTs to the City of Escondido *Roadway Classification, LOS, and ADT Table*. This table, included in Technical Appendix C of the LMA, provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.

Per the TIAG, the following thresholds are to be used to identify if a project is responsible for making transportation operational improvements. If at any time a project causes the values in Table 4.11-3, *City of Escondido Level of Service Thresholds*, to be exceeded on a roadway segment or at an intersection that is operating at a LOS D or worse, the project shall identify improvements to achieve the desired LOS/delay. As shown in Table 4.11-3, if a proposed project's traffic increases the delay at an intersection operating at LOS D, E, or F by 2 seconds or increases the V/C ratio by 0.02 at a segment operating at LOS D, E, or F, the effects of the project are determined to justify improvements.

Table 4.11-3
CITY OF ESCONDIDO LEVEL OF SERVICE THRESHOLDS

LOS with Project	Allowable Change Due to Project		
	Roadway Segments		Intersections
	V/C	Speed (mph)	Delay (seconds)
D, E, or F	0.02	1	2.0

Source: City 2021e
Notes:
Transportation Improvement should be considered for any segment or intersection operating at LOS F.
The roadway capacity is the LOS D threshold.
LOS = Level of Service; V/C = volume to capacity ratio; mph = miles per hour

4.11.5 Project Impact Analysis

4.11.5.1 Consistency with Plans and Policies Addressing Circulation System

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

Impact Discussion

Pedestrian/Bicycle/Transit

Transportation modes other than the automobile are promoted and emphasized in the Regional Plan and the Mobility and Infrastructure Element of the City's General Plan. Planning and implementation of new and enhanced transit and active transportation (i.e., pedestrian and bicycle) facilities, both on a regional and local scale, are paramount to these adopted transportation plans. This is evident in the Regional Plan's 5 Big Moves that all highlight some form of transit, pedestrian, bicycle, and other transportation modes and strategies, as well as multiple goals and policies contained in the City's General Plan Mobility and

Infrastructure Element and Bicycle Master Plan. The project would be consistent with these plans and policies primarily because (1) it would provide additional facilities to improve multi-modal connections in the project area; and (2) it would not preclude or impede implementation of planned multi-modal improvements in the project area.

Roadway improvements to Felicita Road are proposed along the project frontage and to Palm Terrace to the south. Felicita Road currently has an 84-foot-wide ROW with 47 feet of pavement, a 5.5-foot-wide sidewalk on the west side, and curb and gutter on both sides. Along the project frontage, the pavement would be widened an additional 17 feet on the east side (for a total paved width of 64 feet) and a 5.5-foot-wide sidewalk and curb and gutter would be constructed on the east side of the widened pavement that would extend to Palm Terrace. Curb ramps would be installed at the corners of the Brotherton Road and Palm Terrace intersections. The existing sidewalk along the Brotherton Road project frontage would remain in place. Refer to Figure 3-9 for cross-sections of the proposed roadway improvements.

A Class II bike lane occurs along both sides of Felicita Road, including the project frontage. The project would re-stripe this bike lane along the east side of the widened roadway and would not affect the bike lane on the west side of the roadway.

No bus stops or other transit facilities are located along the roadways surrounding the project site. The closest bus stops are approximately one mile from the project site to the northeast (at the West Felicita Road/South Escondido Avenue intersection) and would not be impacted by the project.

No impacts related to a conflict with a program, plan, ordinance, or policy addressing transit, bicycle and pedestrian facilities would occur as a result of the proposed project.

Roadways

The City's General Plan requires that, if at any time the proposed project causes a roadway segment or intersection in the study area to operate at LOS D or worse, the project must identify improvements to achieve the desired LOS. The LMA/LOS analysis prepared for the project (LLG 2025) evaluates the project's consistency with programs addressing the circulation system, including the City of Escondido General Plan, as summarized below.

Project Trip Generation

The project trip generation was calculated using the trip generation rates published in SANDAG's (Not So) Brief Guide to Vehicular Traffic Generation Rates for San Diego Region (April 2002) for the Apartment classification, which is six trips per unit. Based on the total number of proposed multi-family residential units of 258, the project is calculated to generate 1,548 ADT, 124 of which would be during the AM peak hour (25 inbound/99 outbound) and 139 of which would be during the PM peak hour (97 inbound/42 outbound).

Existing Plus Project Conditions

The Existing Plus Project scenario reflects the addition of project traffic onto existing conditions. Table 4.11-4, *Existing Plus Project Intersection Operations*, summarizes analyzed intersection operations within the study area under Existing Plus Project conditions. As shown, all intersections are calculated to continue to operate at LOS C or better during both the AM and PM peak hours with the exception of the following intersections:

- Gamble Lane/I-15 Southbound Off-Ramp (LOS E during the AM and PM peak hour and LOS D during the PM peak hour)
- Citracado Parkway/Felicita Road (LOS F during the AM peak hour and LOS D during the PM peak hour)
- Citracado Parkway/I-15 Northbound Ramps (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Citracado Parkway/Miller Avenue (LOS D during the AM peak hour)

The LMA identified a calculated project traffic effect at the following intersections since the project-related increase in delay would exceed 2.0 seconds:

- Brotherton Road/Centre City Parkway during the PM peak hour
- Gamble Lane/I-15 Southbound Off-Ramp during the AM and PM peak hours
- Citracado Parkway/Felicita Road during the AM and PM peak hours
- Citracado Parkway/I-15 Northbound Ramps during the AM and PM peak hours
- Citracado Parkway/Miller Avenue during the AM peak hour
- Citracado Parkway/Centre City Parkway during the PM peak hour

The LMA calculated a project traffic effect for the intersections of Citracado Parkway/Felicita Road and Citracado Parkway/I-15 Northbound Ramps because these intersections would operate at LOS E or F and the change in delay would exceed 2.0 seconds.

Table 4.11-4
EXISTING PLUS PROJECT INTERSECTION OPERATIONS

Intersection	Peak Hour	Existing		Existing + Project		△ Delay	Project Effect?
		Delay	LOS	Delay	LOS		
1. Brotherton Road/	AM	12.3	B	12.4	B	0.1	No
Felicita Road	PM	21.2	C	21.8	C	0.6	No
2. Brotherton Road/	AM	DNE	--	8.8	A	--	No
Project Driveway #1	PM	DNE	--	8.7	A	--	No
3. Brotherton Road/	AM	17.2	C	19.1	C	1.9	No
Miller Avenue	PM	10.9	B	11.6	B	0.7	No
4. Brotherton Road/	AM	15.7	C	15.7	C	0	No
Centre City Parkway	PM	31.1	D	31.1	D	0	No
5. Felicita Road/	AM	DNE	--	15.7	C	--	No
Project Driveway #2	PM	DNE	--	20.2	C	--	No
6. Gamble Lane/I-15	AM	27.7	D	28.4	D	0.7	No
Southbound Off-Ramp	PM	25.9	D	27.8	D	1.9	No
7. Citracado Parkway/	AM	75.0	E	86.4	F	11.4	Yes
Felicita Road	PM	37.7	D	38.7	D	1.0	No
8. Citracado Parkway/I-15	AM	--	--	--	--	--	--
Southbound On-Ramp[1]	PM	--	--	--	--	--	--
9. Citracado Parkway/I-15	AM	36.8	E	46.2	E	9.4	Yes
Northbound Ramps	PM	29.3	D	35.6	E	6.3	Yes
10. Citracado Parkway/	AM	26.2	D	27.7	D	1.5	No

Intersection	Peak Hour	Existing		Existing + Project		△ Delay	Project Effect?
		Delay	LOS	Delay	LOS		
Miller Avenue	PM	16.6	C	17.6	C	1.0	No
11. Citracado Parkway/	AM	8.4	A	8.5	A	0.1	No
Alexander Drive	PM	9.2	A	9.3	A	0.1	No
12. Citracado Parkway/	AM	21.2	C	21.4	C	0.2	No
Centre City Parkway	PM	41.9	D	42.0	D	0.1	No

Source: LLG 2025

[1] Per coordination with Caltrans, this intersection should be treated as a "no control" type since there are no stop or yield signs for any movement. Therefore, no delays are calculated.

DNE = Does Not Exist

LOS = Level of Service

△ = increase in delay due to the project

Table 4.11-5, *Existing Plus Project Street Segment Operations*, summarizes analyzed street segment operations within the study area under Existing Plus Project conditions. As shown, all street segments are calculated to continue to operate at LOS C or better with the exception of the following segments:

- Felicita Road between Brotherton Road and Project Driveway #2 (LOS D)
- Felicita Road between Project Driveway #2 and Citracado Parkway (LOS D)
- Centre City Parkway between Brotherton Road and Citracado Parkway (LOS D)

The LMA calculated a project traffic effect for the segment of Felicita Road between Project Driveway #2 and Citracado Parkway because this segment would operate at LOS E and the change in volume to capacity ratio would exceed 0.02.

Table 4.11-5
EXISTING PLUS PROJECT STREET SEGMENT OPERATIONS

Street Segment	Existing			Existing + Project			△ V/C	Project Effect?
	ADT	LOS	V/C	ADT	LOS	V/C		
Brotherton Road								
Felicita Road to Project Driveway #1	410	A	0.082	600	A	0.120	0.038	No
Project Driveway #1 to Miller Avenue	410	A	0.082	640	A	0.128	0.046	No
Miller Avenue to Alexander Drive	630	A	0.126	1,060	A	0.212	0.086	No
Alexander Drive to Centre City Parkway	750	A	0.150	750	A	0.150	0	No
Citracado Parkway								
I-15 Southbound Off-Ramp to Felicita Road	11,350	A	0.307	11,470	A	0.310	0.003	No
Felicita Road to I-15 Southbound On-Ramp	10,080	A	0.272	10,540	A	0.285	0.013	No
I-15 Southbound On-Ramp to I-15 Northbound Ramps	8,420	A	0.228	8,810	A	0.238	0.010	No
I-15 Northbound Ramps to Miller Avenue	6,800	B	0.453	7,070	B	0.471	0.018	No

Street Segment	Existing			Existing + Project			△ V/C	Project Effect?
	ADT	LOS	V/C	ADT	LOS	V/C		
Miller Avenue to Alexander Drive	4,560	A	0.304	4,640	A	0.309	0.005	No
Alexander Drive to Center City Parkway	3,990	A	0.266	4,070	A	0.271	0.005	No
Felicita Road								
Brotherton Road to Project Driveway #2	11,490	D	0.766	11,760	D	0.784	0.018	No
Project Driveway #2 to Citracado Parkway	11,490	D	0.766	12,230	D	0.815	0.049	Yes
Miller Avenue								
Brotherton Road to Citracado Parkway	1,590	A	0.318	1,940	B	0.388	0.070	No
Centre City Parkway								
Brotherton Road to Citracado Parkway	27,940	D	0.755	27,940	D	0.755	0	No

Source: LLG 2025
LOS = Level of Service
△ = increase in V/C due to the project
V/C = volume to capacity ratio

Near-Term (Year 2025) Conditions

The Near Term Plus Project scenario reflects the anticipated roadway operations in the project area at the time the project is constructed and operational. It accounts for traffic generated by other reasonably foreseeable projects in the study area in combination with the project at the projected "Opening Day" year of the proposed project, which is 2025.

Table 4.11-6, *Near-Term Plus Project Intersection Operations*, summarizes analyzed intersection operations within the study area under Near-Term Plus Project conditions. As shown, all intersections are calculated to continue to operate at LOS C or better during both the AM and PM peak hours with the exception of the following intersections:

- Brotherton Road/Centre City Parkway (LOS D during the PM peak period)
- Gamble Lane/I-15 Southbound Off-Ramp (LOS D during the AM and LOS E during the PM peak hour)
- Citracado Parkway/Felicita Road (LOS F during the AM peak hour and LOS D during the PM peak hour)
- Citracado Parkway/I-15 Northbound Ramps (LOS F during the AM and PM peak hours)
- Citracado Parkway/Miller Avenue (LOS D during the AM peak hour)
- Citracado Parkway/Centre City Parkway (LOS D during the PM peak hour)

The LMA identified a calculated project traffic effect at the following intersections since the project-related increase in delay would exceed 2.0 seconds:

- Gamble Lane/I-15 Southbound Off-Ramp during the PM peak hour

- Citracado Parkway/Felicita Road during the AM peak hour
- Citracado Parkway/I-15 Northbound Ramps during the AM and PM peak hours for the off-ramp movements

Table 4.11-6
NEAR-TERM PLUS PROJECT INTERSECTION OPERATIONS

Intersection	Peak Hour	Near-Term		Near-Term + Project		△	Project
		Delay	LOS	Delay	LOS	Delay	Effect?
1. Brotherton Road/	AM	12.6	B	12.7	B	0.1	No
Felicita Road	PM	21.6	C	22.2	C	0.6	No
2. Brotherton Road/	AM	DNE	DNE	8.8	A	--	No
Project Driveway #1	PM	DNE	DNE	8.7	A	--	No
3. Brotherton Road/	AM	17.2	C	19.1	C	1.9	No
Miller Avenue	PM	10.9	B	11.6	B	0.7	No
4. Brotherton Road/	AM	16.2	C	16.2	C	0	No
Centre City Parkway	PM	33.6	D	33.6	D	0	No
5. Felicita Road/	AM	DNE	DNE	16.0	C	--	No
Project Driveway #2	PM	DNE	DNE	20.6	C	--	No
6. Gamble Lane/I-15	AM	31.9	D	32.8	D	0.9	No
Southbound Off-Ramp	PM	35.2	E	38.5	E	3.3	Yes
7. Citracado Parkway/	AM	75.6	E	86.6	F	11.0	Yes
Felicita Road	PM	37.8	D	38.8	D	1.0	No
8. Citracado Parkway/I-15	AM	--	--	--	--	--	--
Southbound On-Ramp	PM	--	--	--	--	--	--
9. Citracado Parkway/I-15	AM	46.4	E	62.1	F	15.7	Yes
Northbound Ramps[1]	PM	38.9	E	50.7	F	11.8	Yes
10. Citracado Parkway/	AM	28.2	D	30.1	D	1.9	No
Miller Avenue	PM	17.6	C	18.7	C	1.1	No
11. Citracado Parkway/	AM	8.7	A	8.8	A	0.1	No
Alexander Drive	PM	9.8	A	9.9	A	0.1	No
12. Citracado Parkway/Centre City Parkway	AM	22.6	C	22.8	C	0.2	No
	PM	54.2	D	54.3	D	0.1	No

Source: LLG 2025

[1] Per coordination with Caltrans, this intersection should be treated as a "no control" type since there are no stop or yield signs for any movement. Therefore, no delays are calculated.

LOS = Level of Service
DNE = Does Not Exist
△ = increase in delay due to the project

Table 4.11-7, *Near-Term Plus Project Street Segment Operations*, summarizes analyzed street segment operations within the study area under Near-Term Plus Project conditions. As shown, all street segments are calculated to continue to operate at LOS C or better with the exception of the following segments:

- Felicita Road between Brotherton Road and Project Driveway #2 (LOS D)
- Felicita Road between Project Driveway #2 and Citracado Parkway (LOS D)
- Centre City Parkway between Brotherton Road and Citracado Parkway (LOS D)

The LMA calculated a project traffic effect for the segment of Felicita Road between Project Driveway #2 and Citracado Parkway because this segment would operate at LOS D and the change in volume to capacity ratio would exceed 0.02.

Table 4.11-7
NEAR-TERM PLUS PROJECT STREET SEGMENT OPERATIONS

Street Segment	Near-Term			Near-Term + Project			△ V/C	Project Effect?
	ADT	LOS	V/C	ADT	LOS	V/C		
Brotherton Road								
Felicita Road to Project Driveway #1	410	A	0.082	600	A	0.120	0.038	No
Project Driveway #1 to Miller Avenue	410	A	0.082	640	A	0.128	0.046	No
Miller Avenue to Alexander Drive	740	A	0.148	1,170	A	0.234	0.086	No
Alexander Drive to Centre City Parkway	860	A	0.172	860	A	0.172	0	No
Citracado Parkway								
I-15 Southbound Off-Ramp to Felicita Road	11,850	A	0.320	11,970	A	0.324	0.004	No
Felicita Road to I-15 Southbound On-Ramp	10,590	A	0.286	11,050	A	0.299	0.013	No
I-15 Southbound On-Ramp to I-15 Northbound Ramps	8,870	A	0.240	9,260	A	0.250	0.010	No
I-15 Northbound Ramps to Miller Avenue	7,270	B	0.485	7,540	B	0.503	0.013	No
Miller Avenue to Alexander Drive	5,030	A	0.335	5,110	B	0.503	0.018	No
Alexander Drive to Center City Parkway	4,460	A	0.297	4,540	A	0.303	0.006	No
Felicita Road								
Brotherton Road to Project Driveway #2	11,920	D	0.795	12,190	D	0.813	0.018	No
Project Driveway #2 to Citracado Parkway	11,920	D	0.795	12,660	D	0.844	0.049	Yes
Miller Avenue								
Brotherton Road to Citracado Parkway	1,590	A	0.318	1,940	B	0.388	0.070	No
Centre City Parkway								
Brotherton Road to Citracado Parkway	28,840	D	0.779	28,840	D	0.779	0	No

Source: LLG 2025
ADT = average daily trips
LOS = Level of Service
V/C = volume to capacity ratio
△ = increase in V/C due to the project

Long-Term (Year 2035) Conditions

A long-term cumulative scenario was also analyzed, using regional projections of future traffic in the project study area and considering the impact of project traffic added to the 2035 conditions. Long-Term (Year 2035) volumes were obtained from the East Valley Specific Plan Traffic Model. This model reflects the site's current General Plan Land Use of PO. The applicant proposes a General Plan Amendment to change the land use designation from PO to Urban V to allow for multi-family residential. Since the office trip rate is higher than residential, the number of trips generated by the project would be less than what the General Plan anticipated for the project site. Specifically, the project is calculated to generate 828 fewer daily trips and 209 fewer AM and 170 fewer PM peak hour trips than the Planned Office land use currently anticipated by the General Plan. To be conservative, however, project traffic was added to the traffic model.

Table 4.11-8, *Long-Term Plus Project Intersection Operations*, summarizes analyzed intersection operations within the study area under Long-Term Plus Project conditions. As shown, all intersections are calculated to continue to operate at LOS C or better during both the AM and PM peak hours with the exception of the following intersections:

- Brotherton Road/Felicita Road (LOS D during the PM peak hour)
- Brotherton Road/Miller Avenue (LOS E during the AM peak hour)
- Brotherton Road/Centre City Parkway (LOS E during the PM peak hour)
- Gamble Lane/I-15 Southbound Off-Ramp (LOS F during the AM and PM peak hours for the off-ramp movements)
- Citracado Parkway/Felicita Road (LOS F during the AM peak hour and LOS D during the PM peak hour)
- Citracado Parkway/I-15 Northbound Ramps (LOS F during the AM and PM peak hours for the off-ramp movements)
- Citracado Parkway/Miller Avenue (LOS E during the AM peak hour)
- Citracado Parkway/Centre City Parkway (LOS E during the PM peak hour)

The LMA identified a calculated project traffic effect at the following intersections since the project-related increase in delay would exceed 2.0 seconds:

- Brotherton Road/Miller Avenue during the AM peak hour
- Gamble Lane/I-15 Southbound Off-Ramp during the AM and PM peak hours for the off-ramp movements
- Citracado Parkway/Felicita Road during the AM and PM peak hours
- Citracado Parkway/I-15 Northbound Ramps during the AM and PM peak hours for the off-ramp movements
- Citracado Parkway/Miller Avenue during the AM peak hour

Table 4.11-8
LONG-TERM PLUS PROJECT INTERSECTION OPERATIONS

Intersection	Peak Hour	Long-Term		Long-Term + Project		△ Delay	Project Effect?
		Delay	LOS	Delay	LOS		
1. Brotherton Road/ Felicita Road	AM	14.7	B	14.9	B	0.2	No
	PM	30.8	D	32.5	D	1.7	No
2. Brotherton Road/Project Driveway #1	AM	DNE	DNE	9.1	A	--	No
	PM	DNE	DNE	8.8	A	--	No
3. Brotherton Road/ Miller Avenue	AM	36.0	E	45.0	E	9.0	Yes
	PM	13.0	B	14.4	B	1.4	No
4. Brotherton Road/Centre City Parkway	AM	18.2	C	18.2	C	0	No
	PM	45.2	E	45.2	E	0	No
5. Felicita Road/Project Driveway #2	AM	DNE	DNE	16.6	C	--	No
	PM	DNE	DNE	21.4	C	--	No
6. Gamble Lane/I-15 Southbound Off-Ramp	AM	>100	F	>100	F	>2.0	Yes
	PM	>100	F	>100	F	>2.0	Yes
7. Citracado Parkway/ Felicita Road	AM	>100	F	>100	F	>2.0	Yes
	PM	42.2	D	46.3	D	4.1	Yes
8. Citracado Parkway/I-15 Southbound On-Ramp[1]	AM	--	--	--	--	--	--
	PM	--	--	--	--	--	--
9. Citracado Parkway/I-15 Northbound Ramps	AM	>100	F	>100	F	>2.0	Yes
	PM	>100	F	>100	F	>2.0	Yes
10. Citracado Parkway/ Miller Avenue	AM	38.3	E	41.9	E	3.6	Yes
	PM	21.4	C	22.8	C	1.4	No
11. Citracado Parkway/ Alexander Drive	AM	9.5	A	9.5	A	0	No
	PM	11.2	B	11.2	B	0	No
12. Citracado Parkway/Centre City Parkway	AM	24.3	C	24.5	C	0.2	No
	PM	69.8	E	70.0	E	0.2	No

Source: LLG 2025

[1] Per coordination with Caltrans, this intersection should be treated as a "no control" type since there are no stop or yield signs for any movement. Therefore, no delays are calculated.

LOS = Level of Service
DNE = Does Not Exist
△ = increase in delay due to the project

Table 4.11-9, *Long-Term Plus Project Street Segment Operations*, summarizes analyzed street segment operations within the study area under Long-Term Plus Project conditions. As shown, all street segments are calculated to continue to operate at LOS C or better with the exception of the following segments:

- Felicita Road between Brotherton Road to Project Driveway #2 (LOS E)
- Felicita Road between Project Driveway #2 and Citracado Parkway (LOS E)
- Centre City Parkway between Brotherton Road and Citracado Parkway (LOS D)

The LMA calculated a project traffic effect for the segment of Felicita Road between Project Driveway #2 and Citracado Parkway because this segment would operate at LOS E and the change in volume to capacity ratio would exceed 0.02.

Table 4.11-9
LONG-TERM PLUS PROJECT STREET SEGMENT OPERATIONS

Street Segment	Long-Term			Long-Term + Project			△ V/C	Project Effect?
	ADT	LOS	V/C	ADT	LOS	V/C		
Brotherton Road								
Felicita Road to Project Driveway #1	1,500	A	0.300	1,690	A	0.338	0.038	No
Project Driveway #1 to Miller Avenue	1,500	A	0.300	1,730	B	0.346	0.046	No
Miller Avenue to Alexander Drive	1,000	A	0.200	1,430	A	0.286	0.086	No
Alexander Drive to Centre City Parkway	2,200	B	0.440	2,200	B	0.440	0	No
Citracado Parkway								
I-15 Southbound Off-Ramp to Felicita Road	18,000	B	0.486	18,120	B	0.490	0.004	No
Felicita Road to I-15 Southbound On-Ramp	14,710	B	0.398	15,170	B	0.410	0.012	No
I-15 Southbound On-Ramp to I-15 Northbound Ramps	12,060	A	0.326	12,450	A	0.336	0.010	No
I-15 Northbound Ramps to Miller Avenue	8,780	C	0.585	9,050	C	0.603	0.018	No
Miller Avenue to Alexander Drive	4,800	A	0.320	4,880	A	0.325	0.005	No
Alexander Drive to Center City Parkway	5,200	B	0.347	5,280	B	0.352	0.005	No
Felicita Road								
Brotherton Road to Project Driveway #2	14,000	E	0.933	14,270	E	0.951	0.018	No
Project Driveway #2 to Citracado Parkway	14,000	E	0.933	14,740	E	0.983	0.050	Yes
Miller Avenue								
Brotherton Road to Citracado Parkway	2,080	B	0.416	2,430	B	0.486	0.070	No
Centre City Parkway								
Brotherton Road to Citracado Parkway	31,400	D	0.849	31,400	D	0.849	0	No

Source: LLG 2025
ADT = average daily trips
LOS = Level of Service
V/C = volume to capacity ratio
△ = increase in V/C due to the project

Queuing Assessment

Per Caltrans' request, a queuing assessment was conducted for the I-15 freeway ramp intersections where project traffic would be added. The following shows the queue results for the following four intersections: Gamble Lane/I-15 Southbound Off-Ramp, Citracado Parkway/Felicita Road, Citracado Parkway/I-15 Southbound On-Ramp and Citracado Parkway/I-15 Northbound Ramps. The 95th percentile queues

during the AM and PM peak hours are reported. The 95th percentile queue is defined to be the queue length that has only a 5-percent probability of being exceeded during the analysis time period.

- Gamble Lane/I-15 Southbound Off-Ramp: The 95th percentile queues are calculated to be contained within the provided storage under both Existing without and with project scenarios with 377 feet or less at the southbound left-turn movement.

- Citracado Parkway/Felicita Road: The 95th percentile queues are calculated to be contained within the provided storage at the shared southbound through/right-turn, shared westbound through/right-turn and northbound through movements under both Existing without and with project scenarios. The 95th percentile queues are calculated to exceed the provided storage at the southbound left-turn and eastbound left-turn movements under both Existing without and with project scenarios. The project adds a maximum of 36 feet of additional queue (eastbound left-turn movement during the AM peak hour).

- Citracado Parkway/I-15 Southbound On-Ramp: The 95th percentile queues are calculated to be contained within the provided storage under both Existing without and with project scenarios with 16 feet or less at the westbound through movement, 71 feet or less at the westbound left-turn movement and 161 feet or less at the shared eastbound through/right-turn movement.

- Citracado Parkway/I-15 Northbound Ramps: The 95th percentile queues are calculated to be contained within the provided storage under both Existing without and with project scenarios with 44 feet or less at the shared westbound through/right-turn movement, 112 feet or less at the shared northbound through/left-turn movement, and 123 feet or less at the eastbound left-turn movement.

In summary, the queue storage is exceeded at the following movements:

- Citracado Parkway/Felicita Road: southbound left-turn movement

- Citracado Parkway/Felicita Road: eastbound left-turn movement

It should be noted that there is already a queuing deficiency even without project traffic volumes at the above-listed movements.

Summary

Development of the project would generate additional traffic to area roadways. Under Existing Plus Project conditions, Near-Term Plus Project conditions, and Long-Term Plus Project conditions, four intersections and one street segment would operate at LOS D, E, or F, which would exceed the General Plan standards for roadway operations.

Intersections

- Citracado Parkway/Felicita Road (Existing Plus Project, Near-Term Plus Project, Long-Term Plus Project)
- Citracado Parkway/I-15 Northbound Ramps (Existing Plus Project, Near-Term Plus Project, Long-Term Plus Project)

- Gamble Lane/I-15 Southbound Off-ramp (Near-Term Plus Project, Long-Term Plus Project)
- Citracado Parkway/Miller Avenue (Long-Term Plus Project)

Street Segments

- Felicita Road between Project Driveway #2 and Citracado Parkway (Existing Plus Project, Near-Term Plus Project, Long-Term Plus Project)

To provide compliance with the City's General Plan, the project applicant would implement the following improvements/transportation project design features and regulatory compliance measures:

- **Citracado Parkway/Felicita Road**: Re-stripe the eastbound approach to include a second dedicated eastbound left-turn lane and re-stripe the north leg to include a second receiving lane. Also install a "KEEP CLEAR" striping to ensure that eastbound left-turning vehicles do not obstruct the I-15 southbound off-ramp.

- **Citracado Parkway/I-15 Northbound Ramps**: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.

- **Gamble Lane/I-15 Southbound Off-ramp**: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.

- **Brotherton Road/Miller Avenue**: Install an all-way stop control.

- **Citracado Parkway/Miller Avenue**: Contribute a fair-share towards re-striping the eastbound approach to include a dedicated eastbound left-turn lane and a dedicated eastbound through lane.

- **Felicita Road between Project Driveway #2 and Citracado Parkway**: The improvements recommended above at the Citracado Parkway/Felicita Road intersection and the proposed widening of Felicita Road along the project frontage would improve operations at this street segment.

Implementation of these identified project improvements and regulatory compliance measures would improve efficiency of traffic flow, and the intersections and street segments identified in the above analysis as project traffic effects would not exceed the roadway operations thresholds identified in Table 4.11-3 (refer to Tables 14-2, 14-3, and 14-5 in the LMA [LLG 2025]). It should be noted that these are not mitigation measures but shall be made conditions of project approval.

As such, the project would comply with the General Plan Mobility and Infrastructure Element and the associated City's TIAG requirements. Therefore, the proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and bicycle facilities.

Level of Significance Prior to Mitigation

As discussed above, the project would implement transportation project design features and compliance measures to improve roadway operations to meet General Plan standards and requirements.

Transportation impacts related to consistency with plans and policies addressing the circulation system resulting from project implementation would be less than significant. Further, CEQA Guidelines Section 15064.3 states "a project's effect on automobile delay shall not constitute a significant environmental effect."

Mitigation Measures

No significant transportation impacts related to consistency with plans and policies addressing the circulation system would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to consistency with plans and policies addressing the circulation system would remain less than significant.

4.11.5.2 Vehicle Miles Traveled

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

Impact Discussion

According to the City's guidelines, the appropriate VMT metric to analyze for the proposed project is VMT/capita. The proposed project does not meet any of the screening criteria which would exempt a project from the preparation of a VMT analysis and thus, a VMT analysis was conducted for the project (LLG 2025). As described in Section 4.10.4.1, significance thresholds for transportation VMT impacts are based on the project type. For residential projects, the appropriate metric is VMT/capita. The significance threshold for residential projects is 15 percent below the regional average VMT/capita. According to the SANDAG screening map, the average VMT/capita for residential projects in the San Diego region is 18.9 miles. Thus, the significance threshold for project VMT impacts is 16.0 VMT/capita.

The proposed project is not located in a VMT-efficient area (15 percent or more below the base year average household VMT per capita) based on applicable location-based screening map provided by SANDAG. According to the SANDAG map, the project is in census tract 204.03, which has an existing VMT/capita of 18.1. This equates to 95.7 percent of the regional average VMT per capita, which exceeds the threshold of 15 percent below the regional average.

Because the project's VMT/capita exceeds 85 percent of the regional average, calculation of the remaining VMT reduction needed to avoid exceeding the threshold and implementation of mitigation measures are required. Based on the average housing size of 3.21 residents per household as identified in the General Plan Housing Element, the 258 units proposed by the project would house an estimated 828 residents. Using the project VMT/capita of 18.1, the project would be expected to generate 14,987 VMT. For the project to achieve the 15 percent VMT reduction target, it would need to generate a total VMT of 13,248. Thus, a reduction of 1,739 VMT would be required.

The project LMA (LLG 2025) identifies potential VMT reduction strategies based on guidance from the *California Air Pollution Control Officers Association (CAPCOA) 2021 Handbook for Analyzing Greenhouse Gas Emissions Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity (GHG Handbook)* and the *SANDAG Mobility Management Guidebook*. The City adopted a VMT Exchange

Program that provides a mechanism to maintain VMT efficiency within its jurisdiction. This program identifies improvements based on the GHG Handbook that may facilitate or encourage residents to walk, bike, or take transit as substitutes for driving. Specific pedestrian network and infrastructure improvements are described in full below as mitigation measure TRA-1. While these improvements will require an off-site improvement plan, they are limited in scope, occur within the City's existing right-of-way, and may involve considerations such as traffic control and striping.

Level of Significance Prior to Mitigation

As discussed above, VMT generated by the project would be 95.7 percent of the regional average, which exceeds the threshold of 85 percent of the regional average. Therefore, the project would result in a potentially significant VMT impact.

Mitigation Measures

TRA-1 Prior to issuance of certificate of occupancy, the applicant shall install the following pedestrian and network infrastructure improvements, pursuant to the City's VMT Exchange Program as well as Safe Routes to Schools assessments that identify improvements applicable to the VMT Exchange Program, to reduce the VMT generated by the proposed project. The following improvements are listed with their total projected reduction in project VMT, as calculated by the VMT Exchange Program:

- Brotherton Road/Miller Avenue – install high visibility crosswalks on the south, west, and east legs, and a curb ramp on the southwest corner (reduction of 53 VMT)
- Brotherton Road/Centre City Parkway – install a high visibility crosswalk on the west leg, and curb ramps on the northwest and southwest corner (reduction of 31 VMT)
- Citracado Parkway/Felicita Road – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
- Citracado Parkway/Miller Avenue – install a high visibility crosswalk on the north leg, and curb ramps on the northwest and southeast corner (reduction of 31 VMT)
- Citracado Parkway/Alexander Drive – install high visibility crosswalks on the north and south legs, and curb ramps on all four corners (reduction of 62 VMT)
- Citracado Parkway/Centre City Parkway – install a high visibility crosswalk on the north leg (reduction of 15 VMT)
- New sidewalk – one mile of new sidewalk equates to 303 VMT reduction. It is proposed to construct approximately 320 feet of new sidewalk on the east side of Felicita Road between Brotherton Road and the current sidewalk about 320 feet to the north. This would improve pedestrian access to the Life Care Center of Escondido and would equate to a VMT reduction of approximately 18 VMT. The project will also provide sidewalks along its frontage. However, the VMT Exchange Program does not apply towards project frontage.

- Near Bernardo Elementary School
  - Bernardo Avenue/Hamilton Lane – install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Bernardo Avenue/Dexter Place – install high visibility crosswalk on the west leg (reduction of 15 VMT)
  - Mountain Heights Drive/Sunrise Way – install high visibility crosswalk on the north leg (reduction of 15 VMT)

- Near Del Dios Academy of Arts and Sciences School
  - 9th Avenue/Valley Parkway - install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - 9th Avenue/Auto Park Way – install high visibility crosswalk on the north, south, and west legs (reduction of 45 VMT)

- Near Del Lago Academy
  - Crescent Knolls Glen/Scenic Trail Way – install high visibility crosswalk on the north and west legs (reduction of 30 VMT)
  - Citracado Parkway/Scenic Trail Way – install high visibility crosswalk on all four legs (reduction of 60 VMT)

- Near Felicita Elementary School
  - 13th Avenue/Quince Street – install high visibility crosswalk on the north leg (reduction of 15 VMT)
  - 13th Avenue/Redwood Street – install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - 13th Avenue/Tulip Street – install high visibility crosswalk on the north, east, and south legs (reduction of 45 VMT)
  - 15th Avenue/Redwood Street – install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - 15th Avenue/Tulip Street – install high visibility crosswalk on the north and east legs (reduction of 30 VMT)

- Near Juniper Elementary School
  - Juniper Street/Felicita Avenue/17th Avenue – install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Juniper Street – install high visibility crosswalk at the following four locations Avenue (reduction of 60 VMT):
    - west leg of Juniper Street/Green
    - east leg of Juniper Street / Eldorado Drive
    - west leg of Juniper Street/Vermont Avenue
    - east leg of Juniper Street/Cypress Crest Terrace

- Near L.R. Green Elementary School
  - Bear Valley Parkway/Canyon Road – install high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Bear Valley Parkway/Las Palmas Avenue – install high visibility crosswalk on all four legs (reduction of 60 VMT)

  - Casteneda Drive/Las Palmas Avenue – install high visibility crosswalk on the west and south legs (reduction of 30 VMT)
  - Casteneda Drive – install high visibility crosswalk at the L.R. Green Elementary School driveway (reduction of 15 VMT)

- Near Lincoln Elementary School
  - Lincoln Avenue/Broadway – install high visibility crosswalk on the west leg (reduction of 15 VMT)
  - Lincoln Avenue/Escondido Boulevard – install high visibility crosswalk on all four (reduction of 60 VMT)

- Near Miller Elementary School
  - Miller Avenue/Montview Drive – install high visibility crosswalk on the south and west legs (reduction of 30 VMT)
  - Felicita Road/Brotherton Road – install high visibility crosswalk on the east leg (reduction of 15 VMT)

- Other City intersections
  - Citracado Parkway/Escondido Boulevard – install a high visibility crosswalk on the east leg (reduction of 15 VMT)
  - Auto Park Way/Hale Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Valley Parkway/Home Depot Center – install a high visibility crosswalk on the south and west legs (reduction of 30 VMT)
  - Valley Parkway/11th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - La Terraza Boulevard/9th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - 9th Avenue/Tulip Street – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Centre City Parkway/9th Avenue – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - 9th Avenue/Escondido Boulevard – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Valley Parkway/Juniper Street – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Via Rancho Parkway/Quiet Hills Drive – install a high visibility crosswalk on all four legs (reduction of 60 VMT)
  - Via Rancho Parkway/Beethoven Drive – install a high visibility crosswalk on the north, east, and south legs (reduction of 45 VMT)

Level of Significance After Mitigation

Implementation of mitigation measure TRA-1 would result in a total VMT reduction of 1,740 VMT, which would exceed the required reduction of 1,739 VMT. Therefore, with implementation of mitigation measure TRA-1, VMT impacts would be less than significant.

4.11.5.3 Hazardous Design Features

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

Impact Discussion

Access to the residential site would be provided via two full-access driveways, one on Felicita Road and the other on Brotherton Road. Access to the church site would continue to be provided via two full-access driveways from Brotherton Road. The Felicita Road driveway would be fronting a two-way left turn lane which would provide a dedicated lane for vehicles making an inbound southbound left turn to wait for an adequate gap without blocking the southbound through traffic. The Brotherton Road driveway would be fronting a two-lane undivided roadway. Brotherton Road does not provide a left turn pocket; however, given the low number of project trips making an inbound westbound left turn and low eastbound through traffic during the AM and PM peak hours, no traffic hazards are identified with this project access point. Furthermore, the project driveways are calculated to operate at LOS C or better during the AM and PM peak hours under all scenarios.

The internal circulation network does not include hazardous design features or propose incompatible uses. As described in Section 3.3.3, the proposed project's internal circulation would be provided via private aisles to access the residential units. In addition, the project would provide an accessible path of travel through the site and to each residence via pedestrian pathways. The internal drive aisles and project design for both the residential and church site provide adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Level of Significance Prior to Mitigation

Transportation impacts related to hazardous design features resulting from project implementation would be less than significant.

Mitigation Measures

No significant transportation impacts related to hazardous design features would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to hazardous design features would remain less than significant.

4.11.5.4 Emergency Access

Would the project result in inadequate emergency access?

Impact Discussion

During the construction period, roadway users, including emergency vehicles, may experience temporary delays on roadways surrounding the project site as a result of deliveries and the hauling of construction materials. However, such delays would be infrequent, brief, and temporary. Construction staging would

occur within the boundaries of the project site. Temporary lane closures along Felicia Road and Brotherton Road necessary to construct the proposed sidewalk alterations and utility connections would be subject to City approval of a traffic control plan to maintain roadway safety and accessibility for emergency vehicles. Therefore, emergency access, while potentially altered at times, would remain available throughout the project construction period.

The residential site has been designed with two driveways, one on Brotherton Road and Felicita Road. The church site would continue to use two driveways from Brotherton Road. The driveways would be 24 feet wide, which would be wide enough to accommodate emergency vehicle access. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to inadequate emergency access were identified.

Level of Significance Prior to Mitigation

Transportation impacts related to emergency access resulting from project implementation would be less than significant.

Mitigation Measures

No significant transportation impacts related to emergency access would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation is required. Impacts related to emergency access would remain less than significant.

This page intentionally left blank

4.12 Tribal Cultural Resources

This section provides an analysis of potential tribal cultural resources impacts resulting from implementation of the proposed project. The existing conditions and regulatory framework related to tribal cultural resources are also provided in this section. The following analysis relies in part on the assessment of potential tribal cultural resources impacts presented in the project's Cultural Resources Survey (HELIX 2024b), which is included as Appendix E to the EIR. Additional information provided in this analysis has been provided via tribal consultation between the City and Tribes that requested consultation.

4.12.1 Existing Conditions

4.12.1.1 Terminology

PRC Section 21074(a) defines tribal cultural resources as either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Public Resources Code (PRC) Section 21074 further states that a cultural landscape that meets the criteria above is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. A historical resource, unique archaeological resource, or a nonunique archaeological resource may also be a tribal cultural resource if it conforms with the criteria above.

4.12.2 Cultural Setting

Refer to Section 4.4, *Cultural Resources*, of this EIR for a full discussion regarding the existing cultural and historical setting of the project area.

4.12.2.1 Tribal History

The project area is located in a marginal area between the traditional territories of the Yuman-speaking Kumeyaay (Diegueño) and the Takic-speaking Luiseño populations, who inhabited the area at the time of European contact. Boundaries delineated by Bean and Shipek (1978 as cited in HELIX 2024b) would place the project site within the territory of the Kumeyaay while the boundaries delineated by Sparkman (1908 as cited in HELIX 2024b), Kroeber (1925 as cited in HELIX 2024b), and White (1963 as cited in HELIX 2024b), however, would appear to place the project site in Luiseño territory.

The Luiseño territory was subdivided and occupied by different families or bands. More than 80 family groups were known in the early twentieth century (Kroeber 1925 as cited in HELIX 2024b). The Luiseño lived in semi-sedentary villages usually located along major drainages, in valley bottoms, and also on the coastal strand, with each family controlling gathering areas (Bean and Shipek 1978; Sparkman 1908; White 1963 as cited in HELIX 2024b). The Luiseño followed a seasonal gathering cycle, with bands occupying a series of habitation sites within their territory (Bean and Shipek 1978; White 1963 as cited in HELIX 2024b). One band could have multiple areas depending on the season, such as in the mountains or valley areas (Sparkman 1908 as cited in HELIX 2024b). Each band was typically restricted to their territory for hunting and resource gathering. The Luiseño subsisted on seeds, acorns, fruits, and berries, as well as meat caught by hunting and fishing, dependent on the seasons (Kroeber 1925; Sparkman 1908; Lightfoot and Parrish 2009 as cited in HELIX 2024b). While most of the major Luiseño villages known ethnohistorically were located closer to the coast along the Santa Margarita River Valley and the San Luis Rey River Valley, indications of general locations for ethnohistoric Luiseño villages in more inland areas also exist (Kroeber 1925 as cited in HELIX 2024b).

The population of the Kumeyaay people in San Diego in 1770 has been estimated to be between 3,000 and 20,000 (Kroeber 1925; Luomala 1978; Carrico 2018 as cited in HELIX 2024b). The Kumeyaay were territorial, with bands that lived in semi-sedentary, politically autonomous villages or rancherias (Carrico 2008 as cited in HELIX 2024b). Each village was comprised of many households, and groups of villages were part of a larger social kinship system. Villages and larger campsites were generally chosen based on proximity to water, boulder outcrops, environmental protection, and availability of plants and animals (Luomala 1978; True 1990 as cited in HELIX 2024b). Consequently, many of the Kumeyaay villages or rancherias were located in river valleys and along the shoreline of coastal estuaries (Carrico 2008; Kroeber 1925; Luomala 1978 as cited in HELIX 2024b). They subsisted on a hunting and foraging economy, exploiting San Diego's diverse ecology throughout the year; coastal bands exploited marine resources, while inland bands might move from the desert, ripe with agave and small game, to the acorn and pine nut rich mountains in the fall (Cline 1984; Kroeber 1925; Luomala 1978 as cited in HELIX 2024b).

While no ethnographically documented villages are known to have been located in immediate proximity to the project site, Kroeber indicates that two Luiseño villages may have been located to the northeast in the area of uppermost Escondido Creek, and another Luiseño village may have been located to the west along San Marcos Creek (Kroeber 1925 as cited in HELIX 2024b). Three Kumeyaay villages may also have been located along the San Dieguito River to the south of the project area (Kroeber 1925; Trafzer and Carrico 1992 as cited in HELIX 2024b). The closest of these villages with a known location is *Sinyau-Pichkara*, which would have been approximately three miles south of the project site along the San Dieguito River. It is noted that "the Kumeyaay and Luiseño both revere a site [possibly *Sinyau-Pichkara*] near present-day Rancho Bernardo," indicating that the boundary between these two peoples has likely varied over time (Trafzer and Carrico 1992 as cited in HELIX 2024b)

In addition, in proximity to the project site, in Felicita County Park (approximately 0.7 mile to the south), along a small, possibly spring-fed tributary drainage of the San Dieguito River, is a large archaeological site, CA-SDI-570, that, while not being associated by ethnologists and ethnohistorians as the location of a particular named village, has been documented by numerous archaeologists over several decades to contain a substantial quantity of Late Prehistoric period artifacts, indicating that a possibly substantial village was located here in Late Prehistoric times. In recent times, Native Americans, representing both Luiseño and Kumeyaay groups have indicated an affiliation with this site.

4.12.3 Tribal Cultural Resources

Sacred Lands File Search and Tribal Coordination

HELIX contacted the NAHC on June 8, 2023, for a Sacred Lands File search and a list of Native American contacts. The response was received on June 29, 2023. The Sacred Lands File search was positive for the presence of sacred lands within the project vicinity.

Letters to the Native American contacts provided by the NAHC were sent on July 6, 2023 to 31 Native American contacts provided by the NAHC, and four responses were received. The San Luis Rey Band of Mission Indians (San Luis Rey) stated that they have intimate knowledge of the project vicinity and attested to the cultural sensitivity of the area for their tribe during a follow up meeting. The Rincon Band of Luiseño Indians stated that they had no cultural resource information to share and no comments on the project. The San Luis Rey, Campo Band of Mission Indians, and San Pasqual Band of Mission Indians stated that they would like to engage in formal consultation, which is described further in Section 4.12.6.

4.12.4 Regulatory Framework

4.12.4.1 Federal Regulations

See Section 4.4.2.1 for a discussion of federal cultural resources regulations. Cultural resources listed in the NRHP may also be considered tribal cultural resources.

4.12.4.2 State Regulations

See Section 4.4.2.2 for a discussion of California's cultural resources regulations. Cultural resources listed in the CRHR may also be considered tribal cultural resources. PRC Section 5097.98 provides the specific procedure to follow in the event that human remains are determined to be of Native American origin.

Senate Bill 18

SB 18, the Traditional Tribal Cultural Places Bill of 2004, requires local governments to consult with Native American tribes during the project planning process, specifically before adopting or amending a General Plan or a Specific Plan, or when designating land as open space for the purpose of protecting Native American cultural places. The intent of this legislation is to encourage consultation and assist in the preservation of Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance. Through consultation required under SB 18, governments should develop appropriate and dignified treatment of identified cultural resources.

Assembly Bill 52

AB 52, effective July 1, 2015, introduced tribal cultural resources as a class of cultural resources and additional considerations relating to Native American consultation into CEQA. As such, a project that would have an adverse effect on a significant tribal cultural resource would have a significant impact under CEQA. See Section 4.11.1.1 for the definition of a tribal cultural resource provided by PRC Section 21074. AB 52 also established a government-to-government consultation process for consultation between lead agencies and Native American tribes for projects subject to CEQA that are not subject to consultation under SB 18.

PRC Section 21074

PRC Section 21074 provides a definition of tribal cultural resources as either of the following:

1. Sites features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.

    b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

This PRC Section also states that a cultural landscape that meets the criteria above is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Furthermore, a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria above.

PRC Section 5020.1(k)

PRC Section 5020.1(k) provides a definition of "local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

PRC Section 5024.1

PRC Section 5024.1 establishes the CRHR and defines the criteria for listing on the CRHR. For listing in the CRHR, a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

- Criterion 2: It is associated with the lives of persons important in our past.

- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

4.12.4.3 Local Regulations

The City's General Plan policies related to tribal cultural resources and criteria for listing of resources in the local register are provided in Section 4.4.2.3.

4.12.5 Thresholds of Significance

Thresholds used to evaluate potential tribal cultural resources impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant tribal cultural resources impact could occur if implementation of the proposed project would:

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

    i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or

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

4.12.6 Methodology and Assumptions

In addition to the records search, historic aerial photograph and map review, and pedestrian survey described in Section 4.4, *Cultural Resources*, the cultural resources study included a Sacred Lands File search and Native American outreach that contributed to the assessment of potential tribal cultural resources impacts. As described further in Section 4.4.5, an archaeologist and Native American monitor surveyed the project area on June 14, 2023 and July 5, 2024. The pedestrian survey covered both the residential and church development sites.

The NAHC was contacted on June 8, 2023, for a Sacred Lands File search and a list of Native American contacts for the project area. The response received from the NAHC on June 29, 2023, was positive for the presence of sacred lands within the project vicinity. HELIX sent letters on July 6, 2023 to the 31 tribal contacts listed by the NAHC for this project. Four Native American outreach responses were received. The Campo Band of Mission Indians stated that they would like to engage in formal consultation. The Rincon Band of Luiseño Indians stated that they had no cultural resource information to share and, therefore, have no comments. The San Luis Rey Band of Mission Indians stated that they have intimate knowledge of the project vicinity and requested a meeting to discuss. The Jamul Indian Village also requested a meeting to discuss the project.

The project requires the opportunity for Tribes to engage in formal government-to-government consultation with the City under AB 52 and SB 18. The City sent letters inviting the appropriate tribes to consult under AB 52 and SB 18 on August 11, 2023 (AB 52) and August 15, 2023 (SB 18). Three tribes requested formal consultation: Rincon, San Luis Rey and San Pasqual. Staff also received a consultation request from a Tribal Attorney for the Barona Band of Mission Indians, who, upon discussing the project

with City staff, deferred to the local TCA Tribes (San Luis Rey). City staff formally consulted with the Rincon Tribe on March 21, 2024; the San Luis Rey Tribe on December 1, 2023; and the San Pasqual Tribe on January 31, 2024. The three Tribes did not express any specific concerns with the proposed project or potential impacts to identified cultural resources, but did recommend that Native American Monitors be present during ground disturbing activities and also appropriate mitigation be incorporated to address inadvertent discoveries. A minimum area (5'x 5') also should be available in an open space/landscape area for any discoveries to remain on site within a dedicated cultural/conservation easement. The San Pasqual Tribe recommended that a San Pasqual monitor (Kumeyaay) be present during ground disturbing operations.

4.12.7 Project Impact Analysis

4.12.7.1 Tribal Cultural Resources – Historical Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

Impact Discussion

As described in Section 4.4.5.1, the project site does not contain historic resources that are listed in or meet the criteria for listing in the CRHR or a local register. Therefore, no historical resources, including tribal cultural resources, listed or eligible for listing in the CRHR or a local register would be adversely affected by the project.

Level of Significance Prior to Mitigation

Implementation of the project would not result in a substantial adverse change in the significance of a historical resource that would be considered a tribal cultural resource. No impacts would occur.

Mitigation Measures

No significant impacts related to historical resources that would be considered a tribal cultural resource would occur. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No mitigation measures are required. No impacts related to historical resources that would be considered a tribal cultural resource would occur.

4.12.7.2 Tribal Cultural Resources – Significant Resource per PRC Section 5024.1

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Discussion

As previously described, the NAHC Sacred Lands File search was positive for the presence of sacred lands within the project vicinity. In addition, San Luis Rey has indicated the cultural sensitivity of the area for their tribe. San Luis Rey also requested Native American monitoring during ground-disturbing construction activities. Through formal consultation under SB 18 and AB 52, the three Tribes (Rincon, San Luis Rey and San Pasqual) did not express any specific concerns with the proposed project or potential impacts to identified cultural resources, but did recommend that Native American Monitors be present during ground disturbing activities and appropriate mitigation be incorporated to address inadvertent discoveries. Given the presence of sacred lands in the project vicinity and the potential for tribal cultural resources to underly the project site, ground-disturbing activities associated with project construction have the potential to cause a substantial adverse change in the significance of tribal cultural resources.

On December 19, 2025, the Rincon Band of Luiseno Indians concluded consultation; on October 3, 2025, San Luis Rey concluded consultation. As of the date of public review, consultation is ongoing with San Pasqual.

Level of Significance Prior to Mitigation

Implementation of the project could result in a substantial adverse change in the significance of a tribal cultural resource and impacts would be potentially significant.

Mitigation Measures

Mitigation measures CUL-1 through CUL-10, as identified in Section 4.4.5.2 provide for the presence of archaeological and Native American monitors during ground-disturbing activities that would be able to identify any previously unidentified cultural resources, to prevent inadvertent disturbance of any intact cultural deposits that may be present. Should any resources be identified, implementation of mitigation measures CUL-5 through CUL-10 would ensure proper handling and treatment of such resources by providing for a proper evaluation to determine whether additional archaeological work is necessary. Mitigation measures CUL-5 through CUL-10 also provide additional protections for significant resources and describe the process for proper treatment and handling to ensure impacts are minimized.

Level of Significance After Mitigation

With implementation of mitigation measures CUL-1 through CUL-10, impacts to tribal cultural resources would be less than significant.

This page intentionally left blank

5.0 CUMULATIVE IMPACTS

5.1 Introduction

Section 15130 of the CEQA Guidelines requires that an EIR address cumulative impacts of a project when its incremental effect would be cumulatively considerable. As defined in Section 15355, a cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Cumulatively considerable means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future, projects.

Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. The discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone," but instead is to be "guided by standards of practicality and reasonableness" (CEQA Guidelines Section15130(b)). The discussion should also focus only on significant effects resulting from the project's incremental effects and the effects of other projects. According to Section 15130(a)(1), "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

According to CEQA Guidelines Section 15130, the discussion of cumulative effects "... need not provide as great detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness." The evaluation of cumulative impacts is to be based on either:

A. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency, or

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

With the exception of the impact analyses of air quality and GHG emissions, the cumulative list approach has been used in this cumulative analysis, as discussed below. The cumulative impacts of air quality and GHG emissions have been evaluated using the summary of projections method because the geographic scope of such impacts tends to be broad and areawide.

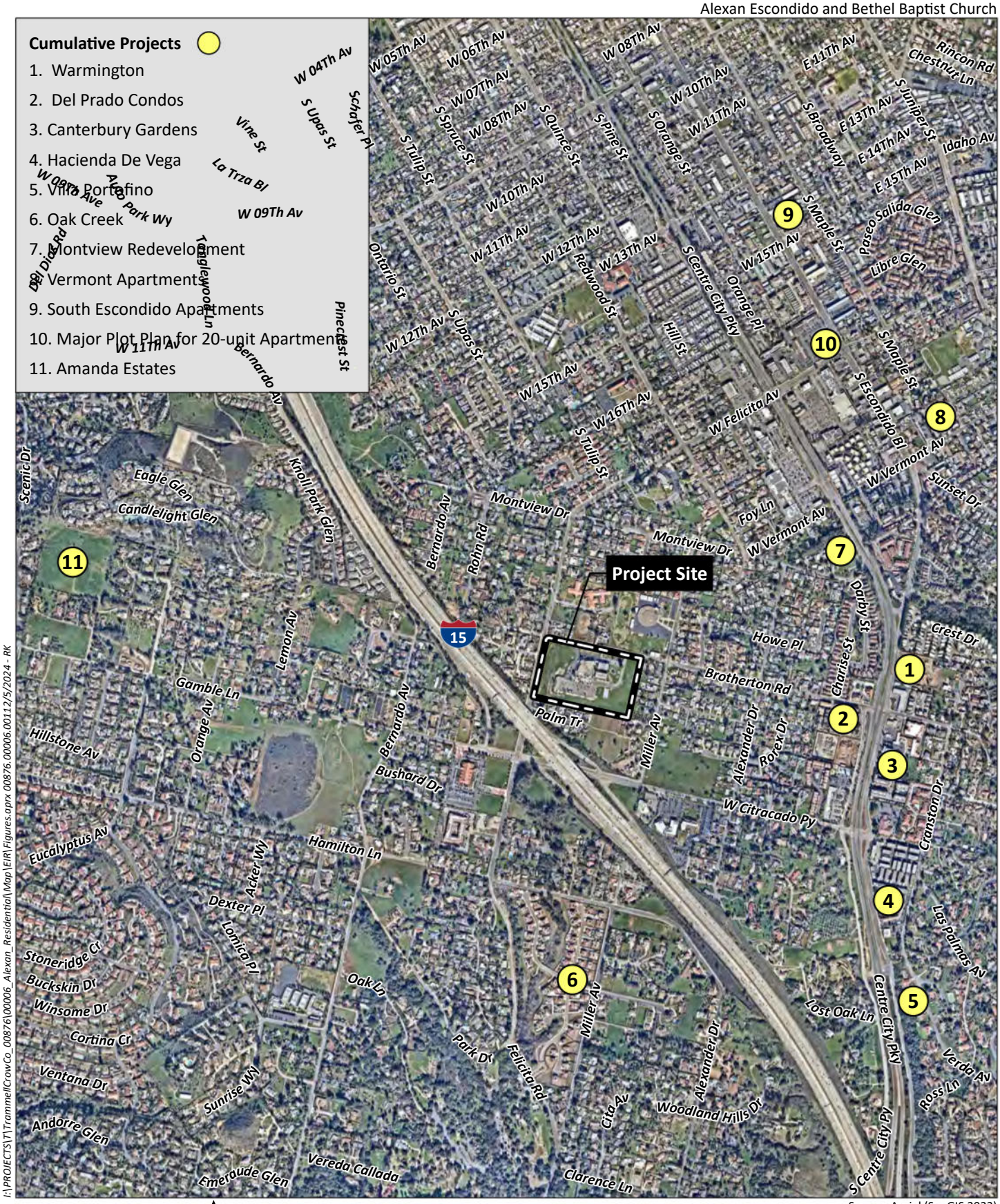
The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis takes into consideration more localized effects. For the analysis of cumulative impacts which are localized (e.g., traffic and noise), a list of past, approved, and pending (i.e., active applications) projects was identified by City staff and the City's Development Services Department Major Development Activity Dashboard available on the Development Services Department website (City 2024) based on their ability to contribute to and/or compound impacts with those of the project. The location of these cumulative projects is illustrated on Figure 5-1, *Cumulative Projects*. Table 5-1, *Cumulative Projects*, contains a brief description of the development associated with these projects (with the numbers in the list corresponding to the locations on Figure 5-1). For other topics, like air quality, the cumulative setting is the region, and analysis is instead based on regional planning documents.

Table 5-1
CUMULATIVE PROJECTS

Name/City Project No.	Description	Location	Status
1. Warmington SUB20-0006	62-unit condo project consisting of 10 three-story buildings	Lot behind 2224 South Escondido Boulevard	Under construction
2. Del Prado Condos PGH15-0031	113-unit townhome-style Planned Development	Southwest corner of South Centre City Parkway and Brotherton Road	Under construction
3. Canterbury Gardens PL21-0042	44 apartment units	2402 South Escondido Boulevard	Under construction
4. Hacienda De Vega SUB19-0010	42-unit, three story townhome development	Structure located north of Escondido Lodge	Under review
5. Villa Portofino ADM18-0225	15-unit apartment complex within a three-story building and parking garage	Lot located south of BAPS! Restaurant between Verda Avenue and South Centre City Parkway	Under review
6. Oak Creek SUB13-0002	65 single-family home development on approximately 44 acres	Southeast corner of Hamilton Lane and Felicita Road	Under review
7. Montview Redevelopment PL23-0310	94-unit apartment project	Northwest corner of Montview Drive and South Centre City Parkway	Under review
8. Vermont Apartments ADM19-0092	44 apartment units	1860 South Escondido Boulevard	Approved
9. South Escondido Apartments PL21-0304	54 apartment units	Northwest corner of South Escondido Boulevard and West 15th Avenue	Approved
10. Major Plot Plan for 20-unit Apartments PL22-0683	Demolition of three existing single-family homes and construction of 20 apartments	Near Orange Place	Under review
11. Amanda Estates PHG13-0034 and SUB13-0007	21 single-family home development on approximately 11.2 acres	2115 Amanda Lane	Approved

5.2 Cumulative Impact Analysis

The following discussion of cumulative impacts includes each environmental topic addressed in Chapter 4, *Environmental Analysis*, of this EIR. A description of the area of influence for cumulative impacts with respect to each environmental topic is provided, followed by an analysis of the potential cumulatively considerable contributions of the proposed project to any significant cumulative impacts.



I:\PROJECTS\T\TrammellCrowCo_00876\00006_Alexan_Residential\Map\EIR\Figures.aprx 00876.00006.00112/5/2024 - RK

0 1,400 Feet

Source: Aerial (SanGIS 2023)

HELIX Environmental Planning

Cumulative Projects

Figure 5-1

5.2.1 Aesthetics

The geographic scope for the aesthetics cumulative analysis includes a 0.25-mile radius around the project site, which would conservatively capture the immediate viewshed and surrounding visible areas not obscured by intervening development and/or topography. This geographic scope, referred to as "project viewshed" for the purposes of this cumulative analysis, generally extends to I-15 west of the project, Montview Drive on the north, Alexander Drive on the east, and I-15 and West Citracado Parkway on the south (refer to Figure 2-3 of this EIR). This area is mostly developed with residential uses but also a mixture of institutional and commercial uses, as well as an agricultural use and transportation facilities.

The proposed project would not have a significant impact related to aesthetics at the project level, as discussed in Section 4.1, *Aesthetics*, of this EIR. Based on the site's location surrounded by development, there are limited opportunities for new development that would inhibit scenic views or visual quality of the area, especially because there are no designated scenic resources in the project area. Moreover, none of the cumulative projects identified in Table 5-1 are located in the project viewshed. Similar to the proposed project, future development in the City, including the identified cumulative projects, would be required to comply with City policies governing visual quality, including open space development standards, lighting standards, grading standards, and protected tree policies. When considered with other reasonably foreseeable projects in the viewshed vicinity, cumulative aesthetics impacts would be less than significant.

5.2.2 Air Quality

The geographic scope for the air quality cumulative analysis is the San Diego Air Basin (SDAB). It is appropriate to consider the entire air basin as air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. While some air quality emissions can be localized, such as a CO hotspot or odor, the overall consideration of cumulative air quality is typically more regional. By its very nature, air pollution is largely a cumulative impact.

The SDAB is a federal and/or state nonattainment area for respirable particulate matter 10 microns or less in diameter (PM_{10}), fine particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and ozone. The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative rather than attributable to any one source. Cumulative projects throughout the air basin generate construction and operational air pollutant emissions that contribute to air quality impacts. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards. If a project's emissions are less than those threshold levels, the project would not be expected to result in a considerable contribution to the significant cumulative impact.

The proposed project and the other projects in the SDAB would contribute particulates and the ozone precursors VOC and NO_X to the area during short-term construction. As described in Section 4.2, *Air Quality*, emissions during project construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Construction emissions would be less than the significance thresholds. Long-term emissions also would be well below regional thresholds.

In addition, another metric for assessing a project's cumulative impact with respect to air quality is whether it is consistent with the growth projections contained in an adopted local, regional, or statewide plan, or a related planning document for air quality. Air quality plans for the SDAB include the Regional Air Quality Standards (RAQS) and Attainment Plan (as described in Section 4.2.2). As part of the RAQS and SIP planning process, the SDAPCD develops an emission inventory, based on growth projections from SANDAG and existing emissions figures within the SDAB. The San Diego Air Pollution Control District (SDAPCD) then uses the emission inventory to conduct modeling to demonstrate that the SDAB will attain and maintain the state and federal ozone standards. This inventory is essentially an "emissions budget" for the SDAB, that accounts for current emissions as well as previously approved projects consistent with General Plans.

Projects that propose development consistent with the growth anticipated by the general plans would be compliant with the RAQS and Attainment Plan. Provided a project's emissions are consistent with the projections within the RAQS and Attainment Plan, the project would not result in a cumulatively considerable impact on ozone within the SDAB. The project would require a General Plan Amendment to change the existing General Plan land use designation from PO to Urban V. Therefore, an analysis was conducted to determine if the project would result in higher ozone precursor emissions levels compared to development allowed under the existing General Plan land use designation.

The proposed density for the residential development is 32.6 dwelling units per acre and the proposed FAR of the project, including existing and proposed components of the church development, would be approximately 0.63. The existing general plan land use designation of PO for the project site has a maximum FAR of 2.0 (City 2012a). For the project site, the maximum buildout under the current General Plan designation would be an office development consisting of approximately 1,291,995 SF of floor space. Using CalEEMod default settings, the resulting maximum daily emissions of ozone precursors for the operations of the office development would be 54.8 pounds per day of VOC and 22.1 pounds per day of NO_X. As discussed in Section 4.2.5.2, the maximum daily ozone precursor emissions for the proposed project would be 15.4 pounds per day of VOC and 4.8 pounds per day of NO_X, which would be well below the maximum buildout ozone precursor emissions for a land use designation of PO. In addition, the project's 258 dwelling units would generate a population increase of approximately 828 individuals, which is only 3.5 percent of SANDAG's projected population growth for the City between 2020 and 2050 (SANDAG 2021). Therefore, the project ozone precursor emissions and population growth would not exceed emissions from the maximum growth anticipated in the General Plan and assumed in development of the RAQS and Attainment Plan.

Criteria air pollutant emissions from the project would be well below regional thresholds and within the projections in the RAQS and Attainment Plan. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact to air quality.

5.2.3 Biological Resources

The geographic scope for the biological resources cumulative analysis is the San Diego County region. Cumulative projects located in the San Diego County region have the potential to affect sensitive biological resources such as special status species, sensitive habitat, and wetlands. Adjacent jurisdictions, including incorporated cities, the County, and tribal governments, would be required to comply with applicable federal and/or state regulations that protect biological resources, such as the federal Endangered Species Act (ESA), the California Endangered Species Act (CESA), and the California Natural Community Conservation Planning (NCCP) Act. If significant impacts occur from particular cumulative projects,

mitigation measures are usually implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of biological resources within the entire San Diego County region, a cumulative loss of such resources could occur, even after mitigation has been implemented for individual projects.

As discussed in Section 4.3, *Biological Resources*, of this EIR, no direct or indirect impacts were identified for special status plant or animal species, with the exception of the potential to impact avian species protected under the Migratory Bird Treaty Act (MBTA) during construction. However, mitigation measure BIO-1 (see Section 4.3.5.1) would reduce that impact to below a level of significance. All other development projects would be subject to the same regulations protecting biological resources. Therefore, the proposed project would not result in a cumulatively considerable contribution to special status species impacts.

The project would impact sensitive natural communities, including emergent wetland and non-native grassland. Implementation of mitigation measures BIO-2 and BIO-3 (see Section 4.3.5.2) would reduce potentially significant direct impacts to a less-than-significant level, and no net loss of riparian habitat or sensitive natural communities would occur. As stated above, all other development projects would be subject to the same regulations protecting biological resources. Therefore, project impacts to sensitive habitat would not be cumulatively considerable.

The project would also result in impacts to state and federal jurisdictional waters and wetlands associated with the on-site drainage swale. A “no net loss” policy has been established for wetlands by state and federal resource agencies; therefore, the project is required to establish/re-establish jurisdictional habitat at a minimum 3:1 ratio or purchase mitigation credits at an approved mitigation bank. Implementation of mitigation measure BIO-3 (see Section 4.3.5.2) would reduce impacts to wetlands to a less-than-significant level. Other projects that would impact wetlands would be required to mitigate impacts as well, at ratios commensurate with the type and location of the impacts, pursuant to adopted habitat conservation plans and regulatory agency requirements, thereby ensuring that cumulative impacts would result in no net loss of wetlands. Pursuant to mitigation measure BIO-3 and the implementation of applicable mitigation for other projects, construction of the project and other cumulative projects would not result in the net loss of jurisdictional resources. Accordingly, the project would not result in a cumulatively considerable contribution to loss of jurisdictional waters and wetlands. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact to biological resources.

5.2.4 Cultural Resources

The geographic area for the analysis of cumulative impacts related to cultural resources is the San Diego region. Cumulative projects in the San Diego County region have the potential to result in a cumulative impact associated with the loss of historical and/or archaeological resources through development activities or the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings that cause a substantial adverse change in the significance of the resource. Cumulative projects that involve demolition or ground-disturbing activities have the potential to result in significant impacts to cultural resources. These projects would be regulated by applicable federal, state, and local regulations; however, even with regulatory compliance, individual historical resources still could be affected or degraded from demolition, destruction, alteration, or structural relocation as a result of new private or public development, or redevelopment associated with cumulative projects. Likewise, the loss of archaeological resources on a regional level may not be adequately mitigated through the data recovery

and collection methods specified in these regulations, as their value may also lie in cultural values and religious beliefs of applicable groups.

The project site contains one church building that was constructed in 1976 that would be demolished as part of the project and two educational buildings constructed in 1982 and 1993 would remain and be modified. As discussed in Section 4.4, *Cultural Resources*, the existing church building is not considered a historical resource and thus demolition of this building would not result in a substantial adverse change in the significance of a historical resource. The existing education buildings are not of sufficient age to qualify as historical resources under CEQA or historic properties under the NHPA. Therefore, the project would not contribute to a significant cumulative impact on historical resources.

Multiple cumulative projects would involve excavation and other ground-disturbing activities, which allows for the potential for discovering previously unknown buried archaeological resources and human remains. As discussed in Section 4.4, *Cultural Resources*, of this EIR, the proposed project could result in potentially significant impacts to unknown buried archaeological resources. This impact would be mitigated to a level of less than significant with implementation of mitigation measures CUL- 1 through CUL-10 (see Section 4.4.5.2). These mitigation measures would also reduce the proposed project's potential cumulative impacts to unknown buried cultural resources. Thus, the project is not expected to contribute to cumulative impacts within the region to cultural resources. Other development projects would be required to comply with consultation requirements under AB 52 when applicable. With the application of similar cultural resources/tribal assessment, consultation and monitoring requirements to the other cumulative projects when potential impacts to cultural resources are identified, cumulative impacts to cultural resources would be less than significant.

5.2.5 Energy

Potential cumulative impacts related to energy would result if the proposed project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, not achieve building energy efficiency standards, or would result in the wasteful or unnecessary use of energy during construction or operations. The geographic scope for projects which may have a potential cumulative impact related to energy are projects occurring within the areas served by the energy service providers. Projects that include the development of buildings or other structures that have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve substantial ongoing energy use.

As discussed in Section 4.5, *Energy*, of this EIR, the proposed project would not result in the wasteful or inefficient use of energy or result in significant impacts to state or local plans for renewable energy or energy efficiency. Construction and operations associated with the proposed project would result in the use of energy in an efficient manner that would comply with applicable state and local regulations. The use of energy would not be substantial in comparison to statewide electricity, natural gas, gasoline, and diesel demand. New capacity or supplies of energy resources would not be required. Similar to the proposed project, cumulative projects would be subject to CALGreen energy efficiency standards for residential or commercial buildings. In addition, these projects would be required to meet Title 24 building standards, further reducing any inefficient use of energy. Future development would be required to meet increasingly stringent standards, including those set forth in the AB 32 Scoping Plan. Therefore, the

proposed project, in combination with cumulative projects, would not contribute to a significant cumulative impact related to the wasteful or inefficient use of energy.

5.2.6 Greenhouse Gas Emissions

The geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. The discussion presented in Section 4.6, *Greenhouse Gas Emissions*, of this EIR also serves as the project's cumulative impact analysis. This approach is consistent with the supporting documentation published by the California Natural Resources Agency when promulgating the SB 97-related CEQA amendments, which indicated that the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact.

As detailed in Section 4.6, *Greenhouse Gas Emissions*, several plans, policies, and regulations have been adopted for the purpose of reducing cumulative GHG emissions. The project has incorporated several sustainable features into its design to reduce overall emissions, reflecting the types of measures recommended by public agencies to reduce the magnitude of GHG emissions and help California achieve its statewide goals. The project would be consistent with the City's CAP through provision of electric vehicle charging stations, pedestrian facilities, electric water heaters and appliances, and project landscaping. The project also would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, while the project, in combination with the identified cumulative projects, would have the potential to result in a significant cumulative impact to GHG emissions, its contribution would not be considered cumulatively considerable.

5.2.7 Hazards and Hazardous Materials

For the most part, hazardous materials impacts are site-specific and would not combine with impacts from other projects to result in cumulative impacts. Therefore, the geographic scope for the analysis of cumulative impacts related to hazardous materials is defined as the project site and adjacent properties.

The cumulative projects listed in Table 5-1 consist of residential uses; none of the cumulative projects propose industrial land uses or other land uses that would require the transportation, use, or disposal of hazardous materials other than oil and hydrocarbons during construction and standard cleaning and landscaping products during operation. All cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials, including the requirements for spill containment and cleanup procedures. Proper handling and storage of hazardous materials would minimize the potential for accidental spills, while implementation of spill containment and cleanup procedures would prevent significant hazard to the public or the environment in the event of accidental spills. Any cumulative project that proposes development of a potential hazardous materials site would be required to remediate the existing site contamination consistent with applicable regulations. Therefore, cumulative impacts related to hazardous materials would be less than significant.

Cumulative projects in the City would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, local fire codes, and regional/jurisdictional emergency response and evacuation plans. The project's construction would occur within the project site, and existing access for emergency service

providers would be maintained during the entire construction. Due to existing regulations, cumulative projects would not result in a significant cumulative impact associated with the implementation of emergency response and evacuation plans.

The project site and surrounding area is not located within a VHFHSZ as designated by CalFire (CalFire 2024). However, the project site is designated by the City as a High Fire Hazard Severity Zone. The project and cumulative projects would be required to comply with existing regulations that would reduce wildfire risk, including applicable fire and building codes. Thus, development of the proposed project or cumulative projects would not exacerbate wildfire risk and cumulative projects would not result in a significant cumulative impact related to wildland fire.

5.2.8 Land Use and Planning

The geographic scope for the land use cumulative analysis includes the City of Escondido. Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions but can have implications on surrounding areas.

Cumulative projects with the City would be required to comply with the General Plan and applicable policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Projects that are not consistent with existing land use designations would require approval of a General Plan amendment, as applicable. Projects that require a General Plan amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations. Where significant or potentially significant impacts are identified, implementation of feasible mitigation would be required to reduce or avoid significant land use impacts. As discussed in Section 4.8, *Land Use and Planning*, of this EIR, with implementation of project design features to prevent future project residents from being exposed to interior noise levels in excess of General Plan standards, the project would not result in significant impacts related to consistency with land use plans, policies, or regulations. As such, cumulative impacts related to consistency with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

5.2.9 Noise

Noise and vibration impacts are limited to the area directly surrounding the project site, as noise and vibration attenuate with distance and only have the potential to combine with other sources in the immediate vicinity. As such, geographic scope for the cumulative noise analysis includes the area within 1,500 feet of the project site.

Construction noise and vibration impacts are localized in nature because they are limited to the site where construction equipment is operating. As described in Section 4.9.5.1, noise levels during the construction of the proposed project would not exceed the 75 dBA 1-Hour L_{EQ} limit. As described in Section 4.9.5.2, the project would not operate vibratory equipment within 80 feet of nearby structures to reduce the potential for human annoyance. Future projects and the project would be subject to the City of Escondido construction noise ordinance, which limits construction noise to 75 dBA L_{EQ} at the nearest residence, and vibration limits, which limits vibration levels to 80 VdB at residential land uses. Compliance with the construction noise ordinance and vibration limits would ensure that a significant impact would not occur. In addition, there are no cumulative projects adjacent to the proposed project site such that the project's construction noise and vibration effects would combine to increase the impact of the project. Therefore,

the project's contribution to cumulative temporary noise increases related to construction would be less than significant and not cumulatively considerable.

The potential for a cumulative noise impact during operation is primarily related to traffic generation when trips generated by multiple projects combine to substantially increase noise levels. A significant cumulative traffic noise impact would occur if the project in combination with cumulative projects would increase traffic noise levels above the City's incremental noise thresholds at nearby NSLU receivers. As discussed in Section 4.9.4.3, the applicant proposes a new church building that would essentially be the same size as the existing church building, so no net increase in church trips would occur. Therefore, the traffic noise analysis only considers the residential development portion of the project. A comparison of existing, cumulative, and cumulative plus project traffic noise levels is provided in Table 5-2, *Cumulative Off-Site Traffic Noise Levels*, and compared with the City's incremental noise thresholds.

Table 5-2
CUMULATIVE OFF-SITE TRAFFIC NOISE LEVELS

Receiver	Traffic Noise Exposure (L_{DN})					
	Existing (2025 - No Project)	Allowable Noise Increment	Cumulative (2035 – No Project)	Cumulative (2035 – With Project)	Cumulative Change	Project Contribution to Cumulative Change
R1	68	+1	68	68	+0	+0
R2	72	+0	72	72	+0	+0
R3	73	+0	73	73	+0	+0
R4	67	+1	67	67	+0	+0
R5	66	+1	67	67	+0	+0
R6	70	+0	70	70	+0	+0
R7	64	+1	65	65	+1	+0
R8	69	+1	71	71	+2	+0

Source: HELIX 2025
L_{DN} = day-night average sound level

As shown in Table 5-2, traffic noise levels at NSLU receivers near the project site would not increase above the allowable noise increment under cumulative conditions except for Receiver R8, on West Citracado Parkway. However, the addition of project-generated trips would not increase the cumulative traffic noise level, and the project's contribution to the cumulative increase in traffic noise levels would therefore be negligible. Thus, the project would not result in a cumulatively considerable increase in ambient traffic noise.

As no operational sources of vibration are proposed and the project would not alter airport operations or be within an airport noise contour, the project would not contribute to the cumulative impacts of vibration or airport noise in the project area.

5.2.10 Population and Housing

The geographic scope for the population and housing cumulative analysis includes the City of Escondido.

As discussed in Section 4.10.5.1, the proposed project would introduce an estimated 828 people resulting from the development of 258 residential units. Based upon regional projections, comparisons to current land use designations, and comparison with the Regional Housing Needs Assessment (RHNA) planning

periods, the introduction of the estimated 828 people would not be considered substantial and were included in regional growth projections. The cumulative projects listed in Table 5-1 are all residential projects. Projects that include residential development may increase population in the City similar to the proposed project. The introduction of a new population is not, in and of itself, a significant impact. Per SANDAG growth projections, the City is expected to grow by 15.5 percent in population and 25.1 percent in housing units by the year 2050. Population and housing generated by the cumulative projects are either included in those growth projections (based on land use designations for specific sites) or would not substantially increase growth due to the number of residential units associated with the cumulative projects.

Further, the project would not result in the removal of a barrier of growth that would reasonably result in the intensification or development of land. Utility and infrastructure improvements would be sized to only adequately serve the proposed project (see Section 6.7, *Utilities and Service Systems*). Additionally, because the project is surrounded by existing development, it is unlikely that the approval and construction of the project would lead to an intensification of the land uses in the immediate vicinity of the site. Therefore, cumulative impacts would be less than significant.

5.2.11 Transportation

The geographic scope for the cumulative transportation analysis includes the surrounding transportation network that was evaluated in the project-specific LMA (LLG 2025) that is included as EIR Appendix J.

The analysis presented in Section 4.11, *Transportation*, includes consideration of the cumulative transportation impacts of the project due to the nature of the analysis considering future conditions that account for cumulative projects. Specifically, the General Plan consistency analysis addresses the cumulative roadway and intersection conditions, including opening year 2025 and Year 2035, and the VMT analysis considers the cumulative conditions. As described in Section 4.11.5.1, the project applicant would be required to implement transportation design features and regulatory compliance measures to improve efficiency of traffic flow. These improvements are conditions of project approval and would allow the project to comply with the General Plan Mobility and Infrastructure Element. The cumulative projects also would be required to implement roadway improvements, as necessary on project-specific basis, to be in compliance with the General Plan Mobility and Infrastructure Element. Cumulative impacts to the circulation system would be less than significant.

The VMT analysis presented in Section 4.11.5.2 also considers the cumulative regional conditions in addition to the local conditions. VMT generated by the project would be 95.7 percent of the regional mean (LLG 2025). A VMT of 85 percent of the regional mean is the threshold for significance. Therefore, the project would result in a significant VMT impact. Implementation of mitigation measure TRA-1, which entails implementation of pedestrian and infrastructure improvements per the City's VMT Exchange Program and Safe Routes To Schools program, would reduce VMT impacts to below a level of significance. Other development projects within the City are subject to the City's adopted VMT thresholds established in the City's TIAG (City 2021) and implementation of VMT reduction measures, as applicable. Thus, while the project, in combination with the identified cumulative projects, would have the potential to result in significant cumulative VMT impacts, its contribution would not be considered cumulatively considerable with implementation of mitigation measure TRA-1.

Regarding cumulative transportation hazards and emergency access, the project's infrastructure improvements would be in accordance with applicable City standards, as would other cumulative projects

in the area. As such, cumulative transportation impacts related to traffic hazards or emergency access would be less than significant.

5.2.12 Tribal Cultural Resources

The geographic area for the analysis of cumulative impacts related to tribal cultural resources is the San Diego region. Cumulative projects located in the San Diego region have the potential to result in a cumulative impact associated with the loss of tribal cultural resources through development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. Cumulative projects that involve ground-disturbing activities have the potential to result in significant impacts on tribal cultural resources. These projects would be regulated by applicable federal, state, and local regulations; however, the loss of tribal cultural resources on a regional level may not be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural values and religious beliefs of applicable groups. Therefore, the cumulative destruction of significant tribal cultural resources from planned construction and development projects in the region would be cumulatively significant. Additionally, past projects involving development and construction have already affected tribal resources in the region.

Although no tribal resources have been identified on the project, there is potential for project construction to result in significant impacts on unknown subsurface tribal cultural resources. This significant impact would be mitigated to a level of less than significant with implementation of mitigation measures CUL-1 through CUL-10. Cumulative projects in the area would also likely have the potential to impact known and previously unknown tribal cultural resources; however, other projects would be required to comply with applicable laws and local regulations regarding the preservation of tribal cultural resources. Thus, while the project, in combination with the identified cumulative projects, would have the potential to result in a significant cumulative impact to tribal cultural resources, its contribution would not be considered cumulatively considerable with implementation of mitigation measures CUL-1 through CUL-10.

6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore were not discussed in detail in the EIR. As a result of the environmental scoping process, the impacts associated with the following environmental issue areas were found to not be significant as a result of the proposed project: Agriculture and Forestry Resources; Geology and Soils; Hydrology and Water Quality; Mineral Resources; Public Services; Recreation; Utilities and Service Systems; and Wildfire. A brief explanation indicating the reasons that the effects on these resources would not be significant is provided under each subheading below.

6.1 Agriculture and Forestry Resources

The project site is developed with non-agricultural uses and mapped as Urban and Built-Up Land by the State of California, Department of Conservation (DOC) Division of Land Resources Protection, Farmland Mapping and Monitoring Program (DOC 2022), and does not contain areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is also not zoned for agricultural use or under a Williamson Act contract. The Williamson Act applies to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. Its purpose is to preserve agriculture and open space lands by discouraging premature and unnecessary conversion to urban uses. The project site is currently zoned as R-E and proposed to be rezoned as R-5-30, which do not allow for agricultural land uses. Further, there are no Williamson Act agricultural preserves within the project area. Therefore, the project would not convert Farmland, conflict with existing zoning for agricultural use, or conflict with a Williamson Act contract. No impacts to agricultural resources would occur.

The project site is developed with a church building and does not contain forestlands, timberlands, or timberland zoned Timberland Production. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. Therefore, the project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts to forestry resources would occur.

6.2 Geology and Soils

The project site is not located on an Alquist-Priolo Earthquake Fault Zoning Map and is not underlain by active, potentially active, or inactive earthquake faults (Geocon 2022; Appendix O). The nearest known active fault is the Elsinore Fault approximately 26 miles northwest of the project site; at this distance, the project would not expose people or structures to substantial adverse effects associated with the rupture of a known earthquake fault. However, the project site is likely to be subjected to strong ground motion from seismic activity similar to that of the rest of the San Diego County and Southern California, due to the seismic activity of the region as a whole. Compliance with the CBC and seismic design criteria would reduce exposure of people or structures to potential substantial adverse effects from seismic ground shaking. Impacts would be less than significant.

No risk of liquefaction or landslide has been identified at the project site, and on-site soils are considered to have very low to low expansion potential (Geocon 2022; Appendix O). Construction of the project would be subject to regulations including the CBC. With implementation of site-specific recommendations from

the project's geotechnical investigation (Appendix O to this EIR) and compliance with building codes, the project would not result in landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of the underlying geologic unit. Therefore, impacts associated with placement on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, would be less than significant.

Compliance with NPDES and City requirements related to implementation of construction BMPs identified in a SWPPP would reduce the potential for substantial erosion or topsoil loss to occur during project construction. Once construction of the project is complete, structures and landscaping on-site would stabilize soils, prevent future erosion, and topsoil loss. Therefore, impacts associated with substantial soil erosion or loss of topsoil would be less than significant.

Sewer infrastructure is available at the project site and in adjacent roadways. The proposed project would connect to the City's sewer infrastructure and no septic tanks or alternative wastewater disposal systems are proposed by the project. Therefore, no impacts related to soils incapable of supporting these facilities would occur.

The project site is underlain by undocumented fill and granitic bedrock. These materials exhibit no potential for paleontological resources (City 2012b). No unique geological features, such as rock outcroppings, rock formations, or caves. Therefore, no impacts to paleontological resources or unique geological features would occur.

6.3 Hydrology and Water Quality

The project would be subject to the NPDES Construction General Permit requirement to prepare a SWPPP and implement BMPs during construction. Implementation of such BMPs would ensure the project is compliant with applicable water quality standards. During operation, runoff from the project site would be treated by an on-site biofiltration system to comply with the City's stormwater permits and regulations. Therefore, impacts would be less than significant.

The City does not participate in any groundwater withdrawal, storage, or recharge programs, so the project would not utilize groundwater resources and there would be no impacts related to groundwater supplies or recharge.

SWQMPs were prepared for Alexan Escondido and Bethel Baptist Church, and are included as Appendices M and N, respectively, of this EIR. Site runoff from the proposed residential development would be directed to three proposed stormwater biofiltration basins within the project site: one at the northwest corner, one at the southwest corner, and one in the eastern portion of the site, east of the club house and pool deck. Each biofiltration basin would be approximately 645 SF. Runoff from the biofiltration basins would be discharged through the site via a new 54-inch RCP within a proposed 20-foot-wide easement where it would continue off site to the south in dual 30-inch RCP storm drains and connect to an existing 54-inch RCP storm drain in Palm Terrace.

Site runoff from the proposed church development would be directed to three proposed stormwater biofiltration basins within the church site: one at the northeast corner, one near the northwest corner, and one in the southeast corner. Runoff from the northeastern and northwestern biofiltration basins would be discharged to two curb outlets onto Brotherton Road. Runoff from the southeastern basin would be discharged to three outlets with riprap energy dissipators in the southeastern corner. In addition, a

trench drain would be constructed along the eastern and southern church site perimeters that would also collect runoff and convey it to the three outlets.

Implementation of the project would not result in a substantial change in the site's drainage pattern. The rate and amount of surface runoff from the site would also not change substantially. The project would implement BMPs during the construction period that would prevent substantial erosion or siltation. The project would be subject to NPDES and City requirements related to stormwater treatment and drainage and would provide a stormwater capture and treatment system on-site. The project site is not within a flood hazard area (FEMA 2021). Therefore, impacts related to drainage alterations would be less than significant.

The project site is located approximately 13 miles inland from the Pacific Ocean and would not be subject to inundation by tsunami. Given that the project site is not located near a large standing body of water (the nearest is Lake Hodges, approximately 2 miles southwest of the project site), inundation by seiche (or standing wave) is considered negligible. Inundation by flood is also not expected to occur because as noted above, the project site is not within a mapped flood zone. Therefore, no impacts would occur with respect to potential risk of project pollutants released by inundation by seiche or tsunami.

Additionally, the project is not subject to a sustainable groundwater management plan. The project would comply with the applicable water quality control plan via compliance with NPDES requirements related to stormwater treatment and discharge that prevent water quality degradation in the region. Therefore, the project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

6.4 Mineral Resources

The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZ), according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into four MRZ categories: MRZ 1 for no mineral resources, MRZ 2 for significant resources areas with the quality and quantity known, MRZ 3 for significant resource areas with the quality and quantity unknown, and MRZ 4 for areas with no information.

According to the City's General Plan EIR (City 2012b), areas within the City are designated MRZ-2, MRZ-3, or MRZ-4. The area designated MRZ-2 is a small section of an alluvial fan deposit located just east of Lake Hodges Reservoir, along San Pasqual Valley. The areas designated MRZ-3 and MRZ-4 are scattered throughout the City but generally, the City's downtown core is designated MRZ-4, and the surrounding area, including the project site is designated MRZ-3. These areas contain known mineral deposits that could qualify as mineral resources, but further exploration is needed to determine if they contain mineral resources of value. No mineral extraction sites currently operate in this MRZ, except for the Lake Wohlford Road Pit.

The project site is not identified as an existing or former mineral extraction site in the City's General Plan EIR (City 2012b). The project site is not used for mineral extraction, is not known or designated as a locally important mineral resource recovery site, and is not designated for mineral extraction uses. Therefore, implementation of the proposed project would not result in the loss of availability of a regionally or locally important mineral resource. No impacts to mineral resources would occur.

6.5 Public Services

6.5.1 Fire Protection

The proposed project would receive fire protection services from the Escondido Fire Department (EFD). EFD is a full-service department with seven fire stations throughout the City. Per the City's General Plan, the EFD's response time standard is to respond to priority Level One or Emergency type calls within 7 minutes and 30 seconds, 90 percent of the time. Response time is defined from the time a 911 call is answered at the Escondido Communications Center until an EFD unit arrives on the scene (City 2012a).

The proposed project would increase the demand for EFD resources as a result of the development of residential uses and the associated population increase. Additional residents on the project site would increase the need for fire protection services through routine fire and emergency medical calls. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner will be required to pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for fire protection services.

The closest fire station to the project site is Escondido Station No. 5 located at 2319 Felicita Road, approximately 1,400 feet (0.26 mile) south of the project site. Due to the project's proximity to Fire Station No. 5, as well as payment of public facility fees that go toward addressing the EFD's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities.

6.5.2 Police Protection

The proposed project would receive police protection services from the Escondido Police Department (EPD). Per General Plan Quality of Life Standard #4, EPD's response time standard is to respond to an initial response time for Priority 1 calls (crimes in progress or life threatening) of no more than five minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life-threatening incidents) of no more than six and one-half minutes (City 2012a).

The proposed project would increase the demand on EPD resources as a result of the development of residential uses and the associated population increase. Additional residents on the project site would likely increase the frequency of emergency and non-emergency calls to the EPD. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/property owner will be required to pay the public facility development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for police protection services.

The proposed project would be served by Escondido Police and Fire Headquarters located at 1163 North Center City Parkway, approximately 2.75 miles northwest of the project site. It provides operational and administrative space for the following functions: police patrol, investigations, juvenile crime, domestic violence, community-oriented policing, communications and 911 emergency response services, crime lab, computer-aided dispatch center, emergency operations center, short-term custody of prisoners, and community meeting space. Due to the project's proximity to the Police and Fire Headquarters as well as

payment of public facility fees that go toward addressing the EPD's needs in equipment and staffing, the proposed project would not significantly impact response times.

6.5.3 Schools

Performance objectives for public school services are identified in the General Plan Quality of Life Standard #2, which states that the community shall have sufficient classroom space to meet state-mandated space requirements and teacher/student ratios with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.

The project site is within the service boundaries of Escondido Union School District (EUSD) (Transitional Kindergarten-8th grade) and Escondido Union High School District (grades 9-12). The project site is within the attendance boundaries of the following schools:

- Miller Elementary School: located at 1975 Miller Avenue, approximately 50 feet to the north across Brotherton Road.
- Del Dios Academy of Arts and Sciences: located at 1400 West Ninth Avenue, approximately 1.5 miles to the northwest.
- San Pasqual High School: located at 3300 Bear Valley Parkway, approximately 2.0 miles to the southeast.

Table 6-1, *School Enrollment and Capacity*, summarizes enrollment and capacity at these schools.

Table 6-1
SCHOOL ENROLLMENT AND CAPACITY

School	Enrollment[1] (2022-2023)	Capacity[2]
Miller Elementary	389	480
Del Dios Academy of Arts and Sciences	767	885
San Pasqual High School	1,936	2,122[3]

Sources:
[1] California Department of Education 2024.
[2] EUSD Facilities Master Plan 2020.
[3] Capacity not available; however, enrollment ranged between 2,122 and 2,232 students the previous five school years (2017-2018 through 202-2022).

Using the student generation rate for multi-family residential units provided in the EUSD School Facilities Needs Analysis of 0.2142 students per multi-family unit, the construction of 258 multi-family units on the project site would generate approximately 55 students (EUSD 2018). As shown in Table 6-1, there is sufficient capacity to accommodate these additional students. Furthermore, according to the capacity assessments in EUSD Facilities Master Plan, student enrollment is projected to decline over time. For 2025, projected enrollment is anticipated to decline by 20 percent from 2018 enrollment numbers (EUSD 2020). Therefore, it is expected that there would be enough capacity in the schools to serve the students generated by the proposed project.

Additionally, the project applicant is required to pay school mitigation fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. Payment of these fees would assist in funding EUSD's and Escondido Union High School District's long-range plans. SB 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Such payment shall provide "full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities" (Government Code Section 65995(h)).

6.5.4 Parks

The General Plan Quality of Life Standard #6 states that the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. The City has approximately 50,000 housing units, and the project would construct an additional 258 dwelling units (City 2022). To accommodate a total of 50,258 dwelling units, the City would be required to provide approximately, at minimum, 593 acres of parkland. The City presently maintains approximately 6,556 acres of park and open space, which would be able to accommodate the increase in housing and population as a result of the proposed project (City 2012a). Additionally, consistent with Article 18C, Chapter 6, of the City's Municipal Code, the applicant is required to pay a park fee to ensure that the parkland and recreational facility standards established by the City are met.

The residential development includes 66,070 SF (1.52 acres) of common open space area and 5,089 SF (0.12 acre) of indoor amenity space. Therefore, the proposed residential development would provide a combined total of approximately 1.64 acres of active and passive open space. These areas would be maintained by the Homeowners Association and available for use by project residents.

6.5.5 Libraries

Library service in the City, including the project site, is provided by the Escondido Public Library Department. The increase in demand for library services from development of the proposed project would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects.

6.5.6 Summary

As discussed above, the proposed project would increase demand for public services, including fire protection services, police protection services, schools, parks, and libraries. However, it is not anticipated that the proposed project would result in the need for construction or expansion of existing facilities. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. Impacts would be less than significant.

6.6 Recreation

According to the City's General Plan (City 2012a), the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. The City has approximately 50,000 housing units, and the project would construct an additional 258 dwelling units (City 2022). To accommodate a total of 50,258 dwelling units, the City would be required to provide approximately, at minimum, 593 acres of parkland. The City presently maintains approximately 6,556 acres of park and open space, which would be able to

accommodate the increase in housing and population as a result of the proposed project (City 2012a). The project applicant would additionally be required to pay a park developer fee to minimize potential impacts. The project would include on-site recreational facilities such as a pool and courtyard but would not require the creation or expansion of any recreational facilities outside of the project site. Impacts would be less than significant.

6.7 Utilities and Service Systems

6.7.1 New or Expanded Facilities

The project site is served by existing stormwater, sewer, water, and communication utilities. Site runoff would be directed to three proposed stormwater biofiltration basins within the project site: one at the northwest corner, one at the southwest corner, and one in the eastern portion of the site, east of the club house and pool deck. Each biofiltration basin would be approximately 645 SF. Runoff from the biofiltration basins would be discharged through the site via a new 54-inch RCP within a proposed 20-foot-wide easement where it would continue off site to the south in dual 30-inch RCP storm drains and connect to an existing 54-inch RCP storm drain in Palm Terrace. This stormwater system would accommodate project runoff, as well as off-site runoff that is currently discharged into the existing drainage swale on the site. No new public utilities would be required as the total runoff from the site would not substantially change from existing conditions. As noted on the preliminary hydrology study for the residential site (Nasland 2024; Appendix K), peak runoff volumes would slightly decrease with the proposed stormwater system. As discussed in the preliminary hydrology study for the church site (Nasland 2025b; Appendix L) peak runoff volumes would slightly increase from 17.13 cubic feet per second to 18.63 cubic feet per second. However, this increase would be minimal and would not be considered a significant impact on the existing hydrologic conditions of the church site. Existing sewer and water connections on the project site would be relocated for the project but would not require upgrades to off-site sewer or water mains within Brotherton Road and Felicita Road. No new communication system improvements would be required to serve the project.

Electricity and natural gas service is currently provided to the project site by SDG&E. The project would connect to existing SDG&E infrastructure along Felicita Road and Brotherton Road. The project would remove three existing SDG&E power poles and underground existing overhead power lines along the project frontage on Felicita Road. The project applicant would coordinate with SDG&E for the undergrounding of these overhead lines. The existing power poles and overhead electric lines along Brotherton Road would remain in place. If the project utilizes natural gas, it would connect to the existing gas lines within Felicita Road and/or Brotherton Road.

The proposed utility upgrades would occur within developed land and the potential environmental impacts have been described throughout this EIR. Impacts would be less than significant.

6.7.2 Water Supply

The project site lies within Rincon Del Diablo Municipal Water District (RDDMWD) Improvement District 1 service area. RDDMWD currently serves the project site and would serve the proposed project. RDDMWD supplies potable and recycled water to a population of 30,000 people through nearly 8,000 connections representing residential, agricultural, landscape, and commercial/industrial water uses. RDDMWD's service area includes the Cities of Escondido, San Marcos, and San Diego, and various unincorporated areas of San Diego County. RDDMWD currently imports most of its potable, treated water from the San

Diego County Water Authority (SDCWA) and all of its recycled water from the City's Hale Avenue Resource Recovery Facility (HARRF).

According to the RDDMWD 2020 Urban Water Management Plan (UWMP), the total demand for potable and non-potable water was 4,630 acre-feet per year (AFY) in 2020. RDDMWD has estimated that future demands will increase at the same rate as the SANDAG-projected population growth rate for RDDMWD's service area and generally maintain the same user type profile. As the project is proposing a density increase, there would be a corresponding increase in water demand that would not have been included in the UWMP. The projected potable and non-potable water demand for Years 2025 and 2030 are 6,672 AFY and 7,153 AFY, respectively (RDDMWD 2021). CalEEMod Version 2022.1 assumed 12.6 million gallons of water per year or approximately 38 AFY on the residential site and 807,000 gallons of water per year or approximately 2.5 AFY on the church site, based on the model defaults for the proposed land uses (HELIX 2026). The estimated water consumption of the proposed project is approximately 0.60 percent of RDDMWD's projected water demand for 2025 and 0.56 percent of its project demand for 2030.

As part of its UWMP, RDDMWD must demonstrate that it can reliably meet current and future water demands. According to the UWMP, RDDMWD's water supplies for 2020 totaled 6,617 acre-feet (AF). Projected reasonably available water supply is 8,872 AF for 2025, 9,353 AF for 2030, 9,500 AF for 2035, 9,579 AF for 2040, and 9,727 AF for 2045 (RDDMWD 2021). These projections reflect RDDMWD's goal to supply the growth in demand arising from new development. The UWMP confirmed that current and future water demands for RDDMWD customers can be met through 2045. This has additionally been confirmed in SDCWA's 2020 UWMP and MWD's 2020 UWMP. The Water Reliability Assessment completed as part of the UWMP concluded that RDDMWD is well-positioned to withstand the effects of a single dry year and a five-year drought at any period between 2025 and 2045. RDDMWD's drought risk was specifically assessed between 2021 and 2025, assuming that the next five years are dry years. In each case, water supplies comfortably exceed water demands. This remains true whether the drought occurs in 2021, 2045, or any year between (RDDMWD 2021).

In addition, the SDCWA, Metropolitan Water District and RDDMWD have approved water shortage contingency plans as part of their 2020 UWMPs. The plans include guidance and processes for assessing potential gaps between planned water supply and demands for the current year and the next potentially dry year. The plans include water shortage response actions including a combination of demand reduction, supply augmentation, and operational changes.

Considering existing and estimated future water demand, as described in RDDMWD's UWMP, it is reasonably foreseeable that RDDMWD would have sufficient supplies to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Further, the project site would be redeveloped in compliance with CALGreen (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage in combination with RDDMWD's ongoing water conservation practices. Impacts related to water supply would be less than significant.

6.7.3 Solid Waste Management

Solid waste service to the project site is currently provided by Escondido Disposal, Inc. (EDI), which offers solid waste, green waste, and recyclables pickup. EDI also operates a household hazardous waste facility in Escondido, which is open to city residents. Under the proposed project, the site would continue to be served by Escondido Disposal. Solid waste generated by the project would be collected by EDI and transported to the Sycamore Landfill or, alternatively, the Otay Landfill. According to CalRecycle, the Sycamore Landfill has a daily permitted capacity of 5,000 tons per day for solid waste, a remaining capacity of 113 million CY and an anticipated closure date of 2042 (CalRecycle 2022a). According to CalRecycle, the Otay Landfill has a daily permitted capacity of 6,700 tons per day for solid waste, a remaining capacity of 21 million CY, and an anticipated closure date of 2030 (CalRecycle 2022b).

Demolition and construction of the proposed project would result in the generation of solid waste. CALGreen requires all newly constructed buildings and demolitions to develop a Construction Waste Management Plan (CWMP) and divert a minimum of 65 percent non-hazardous construction debris. The project would be required to prepare and implement a CWMP prior to demolition and construction, which would identify demolition and construction materials to be reduced/salvaged, recycled, or disposed of at a landfill.

Operation of the proposed project would represent an increase in intensity of uses on the project site, with an associated increase in generation of solid waste. The anticipated solid waste generation from the proposed project was estimated using CalEEMod Version 2022.1, which estimated that the proposed residential site would generate approximately 229.9 tons of solid waste per year, and the church site would generate approximately 140 tons of solid waste per year based on the model defaults for the proposed land uses (HELIX 2026). This does not consider any waste diversion through recycling. Solid waste generated by the proposed project during operation would be approximately 2,027 pounds per day, or 1 ton per day, assuming no diversion. However, the proposed project would be required to comply with AB 341, which requires a 75 percent diversion rate. As such, assuming a 75 percent diversion rate, solid waste would be reduced to 507 pounds per day, or 0.25 tons per day. Thus, the project would contribute a minimal amount of solid waste to Sycamore Landfill or Otay Landfill's daily permitted capacity. As such, the proposed project's solid waste generation can be accommodated at the landfill. The project would not 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 proposed project would comply with applicable federal, state, and local statues and regulations regarding solid waste. Specifically, the proposed project would comply with AB 341, which requires a 75 percent diversion rate. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, Public Resources Code (Sections 44001- 44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.) authorizes the County Department of Environmental Health, Local Enforcement Agency to issue solid waste facility permits. The Sycamore Landfill and Otay Landfill are permitted facilities and EDI is a licensed hauler. As such, the project would comply with existing regulations related to solid waste disposal and would not violate federal, state, or local management and reduction statutes and regulations related to solid waste. Impacts related to solid waste management would be less than significant.

6.8 Wildfire

The project site is not located in or near an SRA, which is the area of the state where the State of California is financially responsible for the prevention and suppression of wildfires. SRA does not include lands within city boundaries or in federal ownership. As such, the project site is located in a Local Responsibility Area and fire services are provided by the EFD. The project site is also not located within, adjacent, or near a VHFHSZ designated by CalFire (CAL FIRE 2022).

As discussed in Section 4.7, *Hazards and Hazardous Materials*, and Section 4.11, *Transportation*, the project would not conflict with the emergency response plans, and the site would have adequate emergency access. Access to surrounding roadways and designated emergency evacuation routes in the vicinity, including Felicita Road, Citracado Parkway, Centre City Parkway, and I-15 would be maintained throughout the construction period.

The project would not increase the potential for wildfires in the project area, as the site and vicinity are developed. The new buildings and other proposed site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. The project therefore would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The project site is located in a developed area that is served by existing utilities and roadways. The project would not require the installation or maintenance of roads, fuel breaks, emergency water sources, power lines, or other utilities. Therefore, the project would not exacerbate fire risk associated with these types of improvements.

As discussed in Sections 6.2 and 6.3 above, the project site is not subject to landslides or flooding and thus, the risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible.

Based on the above, impacts related to wildland fires would be less than significant.

7.0 OTHER CEQA REQUIRED SECTIONS

This chapter includes CEQA considerations not contained elsewhere in this EIR but are required to be included per CEQA Guidelines Section 15126. Specifically, discussions of significant and unavoidable environmental effects (CEQA Guidelines Section 15126(b)), significant irreversible environmental effects (CEQA Guidelines Section 15126.2(c)), and growth-inducing impacts (CEQA Guidelines Section 15126.2(d)) are provided in this chapter. Discussion meeting the requirements of CEQA Guidelines Section 15126 (a) and (e) have been provided in Chapter 4, *Environmental Analysis*, and alternatives to the proposed project are discussed in Chapter 8, *Alternatives*, to meet the requirements of CEQA Guidelines Section 15126(f).

7.1 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires an EIR to describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less than significant level. Chapter 6, *Effects Not Found to Be Significant*, of this EIR analyzes and discusses the CEQA environmental topics where the project would not have a significant impact. Chapter 4, *Environmental Analysis*, of this EIR identifies the potential environmental impacts of the project and recommends mitigation measures to reduce impacts, where feasible. The project's identified significant impacts would all be reduced to less than-significant impacts with implementation of the project-specific mitigation measures identified in this EIR. Therefore, there would be no significant and unavoidable impacts resulting from implementation of the proposed project.

7.2 Significant and Irreversible Effects

CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Per CEQA Guidelines Section 15127, irreversible changes are only required to be addressed in EIRs when connected with the adoption, amendment, or enactment of a local plan, policy, or ordinance of a public agency; adoption by a local agency formation commission of a resolution making determinations; or when a project is subject to the National Environmental Policy Act and requires an Environmental Impact Statement. The applicant proposes a General Plan amendment and thus, consideration of irreversible environmental changes is required.

CEQA Guidelines Section 15126.2(d) further notes that significant and irreversible environmental changes may occur as a result of the use of nonrenewable resources during the initial and continued phases of a project since a large commitment of such resources makes removal or nonuse thereafter unlikely. Irreversible environmental changes typically fall into one of the following three categories: primary impacts, meaning the use of nonrenewable resources for the project; secondary impacts, such as highway or roadway improvements that provide access to a previously inaccessible area thereby committing future generations to similar uses; and environmental accidents resulting in environmental changes. CEQA Guidelines Section 15126.2(d) states that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

7.2.1 Irreversible Commitment of Resources

The proposed project would include the demolition of an existing church building and parking lots and the construction of a multi-family residential development comprised of 10 residential buildings, a clubhouse/leasing center building, pet spa, a swimming pool, grassy lawns, and outdoor gathering areas. The project would also include construction of a new church building with connections to the two existing school buildings, two short-term stay residential units for traveling missionaries, an outdoor courtyard, playgrounds, and associated parking and access drives. Associated utilities and transportation infrastructure would be constructed as part of the project.

Construction of the proposed project would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the project because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the project.

Construction of the project would also result in the use of nonrenewable resources including building materials (e.g., concrete asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the project site and the transportation of construction workers to and from the project site (e.g., natural gas, gasoline, diesel fuel and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base.

During project operation, the project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Long-term energy resources include fuel consumed for the heating and cooling of the building, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during operation would increase the consumption of oil, coal, and natural gas. Accordingly, this represents a long-term commitment to the continued consumption of these resources.

As discussed in Section 4.5, *Energy*, of this EIR, the project would not result significant impacts related to wasteful use of energy, fuel consumption, or natural gas.

7.2.2 Irreversible Environmental Changes

Implementation of the proposed project would result in irreversible environmental changes. Irreversible environmental changes are typically associated with the environmental topics of agricultural and forestry resources, biological resources, cultural resources, paleontological resources, mineral resources, and tribal cultural resources.

The project site is currently developed and no agricultural, forestry, or mineral resources occur on the site. As such, implementation of the project would not result in irreversible changes to agricultural and forestry resources or mineral resources. Further discussions of project impacts related to these resources are provided in Chapter 6, *Effects Found Not to be Significant*.

As identified in Section 4.3, *Biological Resources*, project implementation would result in direct impacts to biological resources through the removal of sensitive habitat (emergent wetland and non-native grassland) and jurisdictional resources. Mitigation is identified to reduce impacts to below a level of significance. While impacts to biological resources on the project site would be irreversible, implementation of the identified mitigation would offset the loss such that no net loss of such resources would occur.

The project site is developed with an existing church building that was constructed in 1976 that is proposed to be demolished, as well as two education buildings constructed in 1983 and 1993 that would remain. The existing education buildings are not of sufficient age to qualify as historical resources under CEQA or historic properties under the NHPA. The church building was evaluated for potential listing as a historic resource, but as discussed in Section 4.4, *Cultural Resources*, it was found that the building is not considered a historical resource under CEQA and therefore the project would not result in irreversible environmental changes to historic resources. While there are no recorded or known archaeological or tribal cultural resources within the project site, there are recorded resources within the project vicinity and thus, project implementation has the potential to cause a substantial adverse change to unknown archaeological or tribal cultural resources. Mitigation measures are identified in Section 4.4, *Cultural Resources,* that would reduce impacts to below a level of significance such that no irreversible changes to archaeological or tribal cultural resources would occur.

With regard to paleontological resources, the project site is underlain by documented fill associated with existing development and granitic bedrock. These materials exhibit no potential for paleontological resources (City 2012c). Additional discussion impacts related to paleontological resources is provided in Chapter 6, *Effects Found Not to be Significant*. No irreversible changes to paleontological resources would occur as a result of the project.

The project would not involve road or highway improvements that would provide access to previously inaccessible areas. Roadway widening and installation of sidewalks proposed along the Felicita Road frontage would provide improved connectivity in the project area where existing pedestrian access already exists. As such, the project would not result in significant irreversible secondary impacts.

7.2.3 Potential Environmental Damage from Accidents

Construction and operation of the project would not involve the regular use, transport, storage, or disposal of hazardous wastes. Demolition and construction activities associated with the proposed project would involve some risk for environmental accidents. These activities would be subject to compliance with applicable local, state, and federal regulations and mandates governing the use, storage, transport, and disposal of hazardous materials. Operation would involve the use or storage of common hazardous materials, including cleaning solvents, pesticides and related chemicals associated with landscaping maintenance, and paints. These agents would be used and disposed of in accordance with applicable regulations and laws.

As described in Section 4.7, *Hazards and Hazardous Materials*, the project site was previously used for agriculture with row crops from before 1939 to 1979. Due to these past agricultural uses, on-site soils in portions of the site were evaluated and determined to contain residual concentrations of pesticides, which could pose a health risk to people. Mitigation is identified in Section 4.7, *Hazards and Hazardous Materials*, that would avoid this impact. Therefore, the potential for the proposed project to cause

significant irreversible environmental damage from an accident or upset of hazardous material would be less than significant.

The project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. To address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the project would comply with engineering and design parameters in accordance with the most recent edition of the CBC and/or the Structural Engineers Association of California parameters.

7.3 Growth Inducing Impacts

CEQA Guidelines Sections 15126(d) requires that an EIR discuss a project's potential impacts related to growth inducement. CEQA Guidelines Section 15126.2(e) further states that an EIR should describe the ways in which a proposed project could directly or indirectly foster economic growth, population growth, or additional housing, and how that growth would affect the surrounding environment.

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 7.3.1 through 7.3.3 below.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community.

7.3.1 Direct Population Growth

Refer to Section 4.10, *Population and Housing*, of this EIR for a full discussion of population and housing impacts. As discussed in Section 4.10, *Population and Housing*, the project would directly facilitate growth through development of 258 residential units, which would introduce new residents to the area. According to City's Housing Element, there is an average of 3.21 persons per household in Escondido (City 2023). Using this number and the proposed 258 units, the project would increase the City's existing population of 151,038 (City 2022) by about 828 persons, to approximately 151,866, or by approximately one percent. This population increase would be very small and would not be likely to adversely affect the City or its services. The physical environmental impacts associated with the proposed project's construction and operation as a multi-family residential development are analyzed in Sections 4.1 through 4.12 of this EIR. The analysis has demonstrated that there are adequate services available to serve the project.

7.3.2 Economic Growth

The project would involve residential development and would not include any commercial or industrial development. Other than the short-term construction activities, the project would not directly generate jobs or economic activity. Based on a factor of 3.21 persons per dwelling unit, the proposed project's increase of 258 residential units would add approximately 828 residents to the City's population. These

new residents would incrementally increase activity in nearby commercial establishments. Project residents would be expected to draw on existing retail and commercial services already available in the area rather than inducing new service providers to relocate to the area. As a result, no significant physical effects are anticipated to result from economic growth generated by the proposed project. The proposed project would, however, have minor beneficial economic effects on local retailers and service providers.

7.3.3 Removing Obstacles to Growth

The removal of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service and/or utility infrastructure. A project would trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure to an area that was previously not available. The project is located in in a developed area currently served by existing public services.

The project does not include any extension or expansion of public services beyond connections or upgrades to the existing infrastructure in the immediate vicinity that are required to serve the project. The project would connect to existing utilities within Brotherton Road and Felicita Road, including water, sewer, electricity and telecommunication services, and natural gas, if utilized. The project would not result in the need for new or physically altered facilities related to fire, police, schools, or libraries. Water and sewer service in the project area is provided by the City and would serve the project. Solid waste disposal for the project site would continue to be provided by Escondido Disposal and taken to a landfill with sufficient capacity. Refer to Chapter 6, *Effects Found Not to be Significant*, for further details.

The project would construct roadway and pedestrian improvements on Felicita Road and Brotherton Road. Roadway improvements to Felicita Road are proposed along the project frontage and to Palm Terrace to the south. Felicita Road currently has an 84-foot-wide ROW with 47 feet of pavement, a 5.5-foot-wide sidewalk on the west side, and curb and gutter on both sides. Along the project frontage, the pavement would be widened an additional 17 feet on the east side for a total paved width of 64 feet and a 5.5-foot-wide sidewalk and curb and gutter would be constructed on the east side of the widened pavement that would extend to Palm Terrace. Curb ramps would be installed at the corners of the Brotherton Road and Palm Terrace intersections. A new driveway to the residential property to the immediate south would also be provided. Along Brotherton Road, improvements would include a new sidewalk where it currently terminates at the corner of Brotherton Road and Felicita Road, a new curb cut/driveway at the proposed residential development entrance, and two reconfigured curb cuts/driveways at the church entrances. These are improvements to existing roadways that would improve safety and connectivity but would not provide access to previously inaccessible areas such as to facilitate future development elsewhere. As such, proposed roadway improvements would not trigger growth in the area.

Based on the above, the project would not remove obstacles to growth by extending infrastructure to new areas, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure such as water supply facilities, wastewater treatment plants, roads, or freeways.

This page intentionally left blank

8.0 ALTERNATIVES

8.1 Introduction

CEQA Guidelines Section 15126.6(a) requires that EIRs describe "…a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." CEQA Guidelines Section 15126.6(f) further states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice."

CEQA requires that alternatives be feasible, which is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (PRC Section 21061.1). CEQA Guidelines Section 15126.6(f)(1) states that factors that should be considered with regard to the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. An EIR is not required to consider alternatives that are infeasible or whose effects cannot be reasonably ascertained and whose implementation are remote and speculative.

The alternatives should avoid or substantially lessen one or more significant environmental impacts that would occur under the proposed project. As such, this analysis focuses on the issues discussed in EIR Section 4.1 through 4.12 because of their potential to result in significant impacts on the environment. Environmental issues discussed in Chapter 6, *Effects Found Not to be Significant*, are not carried forward into this alternatives analysis because it was determined that they would result in less than significant impacts on the environment.

Additionally, the CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. CEQA Guidelines Section 15126.6(c) also requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection. Based on the alternatives analysis, an environmentally superior alternative is to be identified.

In developing the project alternatives to be addressed in this EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project, in accordance with CEQA Guidelines Section 15126.6(a). An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the project. The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening significant effects of the project, even if the alternatives would not attain all of the project objectives or would be more costly. It is designed to foster meaningful public participation and informed decision-making.

8.2 Project Objectives

As described in Section 3.2 of this EIR, *Project Objectives*, the following are the primary objectives of the project:

1. Address the City's housing supply needs by providing for the development of a mix of housing units to maximize the advantages of locating new in-fill housing near existing regional transportation facilities with convenient freeway access.

2. Provide an environmentally sustainable residential development through the implementation of features such as energy conservation, sustainable landscape, water conservation, and support for alternative transportation, consistent with the City's CAP.

3. Provide a diverse range of high-quality rental housing that will offer a mix of unit types, sizes, and levels of affordability to accommodate a range of potential residents.

4. Provide for the construction of housing that is consistent with the City of Escondido 2019-2029 Housing Element to assist the City in satisfying its RHNA for both market rate and below market rate housing units.

5. Subdivide an underutilized site to provide both market rate and affordable housing.

6. Provide a new modern church facility on the site that integrates with the existing education buildings to allow for the continued use of the church and private school.

8.3 Significant Environmental Effects of the Project

Based on the evaluations in Section 4.0, *Environmental Analysis*, of this EIR, the project would result in significant but mitigable impacts related to the following environmental topics:

- Biological Resources (sensitive species, sensitive habitats, wetlands)
- Cultural Resources (archaeological resources)
- Hazards and Hazardous Materials (release of hazardous materials)
- Noise (construction-related vibration)
- Transportation (VMT)
- Tribal Cultural Resources (significant tribal cultural resources)

Direct and/or cumulative impacts related to these environmental resources would be reduced to less than significant levels with the incorporation of mitigation measures identified in this EIR.

All other environmental topics were concluded to result in less than significant impacts in Chapter 4, *Environmental Analysis*, and less than significant or no impact in Chapter 6, *Effects Found Not to be Significant*. There would be no significant and unavoidable impacts resulting from implementation of the proposed project.

8.4 Alternatives Considered but Rejected from Further Analysis

CEQA Guidelines Section 15126.6(c) requires that an EIR identify alternatives that were considered and rejected as infeasible, and briefly explain the reasons for their rejection. Alternatives considered but rejected from further study for the project include an alternative project location.

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative location for a project should be considered if development of another site is feasible and if such development would avoid or substantially lessen the significant impacts of the project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan land use designation, and availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in addressing an off-site alternative is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."

One of the factors for feasibility of an alternative site is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." No alternative location exists in the City that is available, of suitable size, owned and controlled by the applicant. While there may be sites within the City of an approximately equivalent size to the project site that could be redeveloped with a multi-family residential project, the project applicant does not control another site within the City of comparable land area that is available for development of the project, and does not have a reasonable expectation that a site of similar size and suitability could be obtained. Acquiring another site of a similar size in a similar location that would also avoid or substantially lessen project impacts is not considered feasible. As such, an alternative location was rejected from further analysis in the EIR.

8.5 Project Alternatives

The following three alternatives are carried forward and evaluated in this EIR as alternatives to the proposed project:

- No Project Alternative;
- Reduced Density Alternative;
- Reduced Footprint Alternative; and
- Planned Office Land Use Alternative.

The following rationale was considered when developing this range of alternatives:

- The "No Project Alternative" is required per CEQA Guidelines Section 15126.6(e). It provides a basis for comparing the impacts that would occur if the project were approved, relative to what would occur if the project were not approved.

- The "Reduced Density Alternative" and "Reduced Footprint Alternative" are included to evaluate whether any identified impacts would be avoided or substantially reduced when compared to the project due to an overall reduced residential density or a reduced development impact footprint.

- The "Planned Office Land Use Alternative" is included as a basis for comparing the impacts that would occur if the project did not propose a General Plan Amendment and instead maintained the existing land use designation for the project site.

These alternatives represent a reasonable range of alternatives, as defined in the CEQA Guidelines, because they provide feasible alternate development patterns that would reduce (but not eliminate) the significant impacts associated with the project. The impacts associated with these alternatives are compared to those identified for the project in the following analysis, and the alternatives are assessed relative to their ability to meet the basic objectives of the project, with a comparative summary of project and alternative impacts provided in Table 8-1, *Comparison of Project and Alternative Impacts*, located at the end of this section.

8.5.1 No Project Alternative

8.5.1.1 Description

CEQA Guidelines Section 15126.6(e) requires that the "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The "no project" analysis is required to discuss the existing conditions (at the time the NOP is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. For a development project such as the proposed project, the "no project" alternative is defined as the circumstance under which the project does not proceed and a comparison of the environmental effects of the property remaining in its existing state against the environmental effects associated with the project. Accordingly, the "No Project Alternative" assumes that the project would not be approved or implemented, no multi-family residential buildings or a new church to replace the existing church building would be constructed, and no roadway improvements to Felicita Road would be constructed. The physical conditions of the project site would remain as they are as described in Chapter 2, *Environmental Setting*, of this EIR. The project site is currently completely developed with a church building, surface parking, and landscaping along with vacant land that contains a drainage swale.

8.5.1.2 Comparative Environmental Analysis

Aesthetics

The No Project Alternative would retain the existing visual conditions at the site. This alternative would not result in the introduction of multi-family residential buildings or enhanced landscaping. Views from the adjacent roadways would continue to be of the developed site and no impact to aesthetics would occur. This is compared to the project for which impacts would be less than significant with no mitigation required. As the No Project Alternative would not result in any site improvements that would change the existing visual environment, no impacts to visual resources would occur.

Air Quality

No demolition, grading, construction, or additional development would occur under the No Project Alternative. Under this alternative, no construction-related air pollutant emissions would occur and the existing air pollutant emissions from the existing development would continue as a result of building operation and vehicle trips to the site. Given the smaller building size and less frequent use of a church compared to residences, the operational emissions from the No Project Alternative would be reduced compared to the proposed project. No new sensitive receptors would be sited at the project site under this alternative and no ventilation improvements would be required. No construction or demolition air

pollutant emissions would occur and no increase in long-term, daily operational emissions would occur, compared to the project, for which such emissions would occur. No air quality impacts would occur under the No Project Alternative.

Biological Resources

Under the No Project Alternative, the project site would remain as it currently exists. No development would occur and there would be no impacts to biological resources on the site. The No Project Alternative would avoid potentially significant impacts to biological resources resulting from the project, including sensitive species, sensitive habitat, and wetlands.

Cultural Resources

No ground-disturbing activity would occur under the No Project Alternative. No change to the existing building would occur, though it was determined the existing church building is not a historical resource. As no subsurface construction activity would occur, this alternative would not have the potential to result in adverse effects to archaeological resources that may be buried within the project site. This is compared to the project for which impacts would be less than significant with mitigation required. No impacts to cultural resources would occur under the No Project Alternative.

Energy

Similar to the description of air quality impacts provided above, the No Project Alternative would not result in the use of energy resources during construction and would not increase the use of energy resources during operation. While the project would have less than significant impacts related to energy use and no mitigation would be required, the No Project Alternative would represent no increase in the amount of energy required for construction and operation. No impacts to energy resources would occur under the No Project Alternative.

Greenhouse Gas Emissions

Similar to the description of air quality impacts provided above, the No Project Alternative would not result in GHG emissions associated with construction and would not increase GHG emissions during operation. No construction GHG emissions would occur and no increase in long-term, daily operational GHG emissions would occur, compared to the project, for which such emissions would occur. No GHG emissions impacts would occur under the No Project Alternative.

Hazards and Hazardous Materials

Under the No Project Alternative, no excavation or removal of contaminated soils on the site would occur and these soils would remain in place. No other new hazards would be generated, as the site would remain in its current condition, which involves use of standard hazardous materials for maintenance in proximity to a school as would occur with the proposed project. No change in hazards or hazardous materials use would occur and there would be no impact under the No Project Alternative.

Land Use and Planning

The No Project Alternative would keep the land use of the project site in its existing condition and the current land use and zoning designations of the site would remain. No change to the land use of the site would occur and there would be no impact.

Noise

The No Project Alternative would not result in construction activities or new stationary and mobile noise sources in the vicinity of existing NSLUs surrounding the project site. Therefore, potentially significant vibration impacts during construction would be avoided under this alternative. Stationary and mobile noise sources associated with operation of the existing church would remain and there would be no new operational noise sources, as proposed under the project. Therefore, no noise impacts would occur under the No Project Alternative.

Population and Housing

As no change in land use is proposed under the No Project Alternative, no residential units would be constructed and the site would continue to operate as a church. Therefore, no increase in population would occur and no new housing units would be constructed on the site to help achieve the City's RHNA. While there would be no population increase, the No Project Alternative would not achieve the project objective to provide infill housing within the City. No impact to population or housing would occur under the No Project Alternative.

Transportation

Under the No Project Alternative, no traffic related to construction or operations would be generated and there would be no VMT, transportation design hazard, or emergency access impacts. While there would be no transportation impacts because no development would occur, the No Project Alternative would not include the construction of new pedestrian facilities and Felicita Road would remain in its existing condition, which is not consistent with its classification in the City General Plan Mobility and Infrastructure Element.

Tribal Cultural Resources

Similar to the discussion of potential cultural resources impacts provided above, the No Project Alternative would not involve ground-disturbing activities, which would eliminate the potential for tribal cultural resources to be adversely affected by construction. No impacts to tribal cultural resources would occur under the No Project Alternative.

8.5.1.3 Conclusion

The No Project Alternative would avoid the significant, but mitigable, impacts related to biological resources (sensitive species, sensitive habitats, wetlands), cultural resources (archaeological resources), hazards and hazardous materials (release of hazardous materials), noise (construction-related vibration), transportation (VMT), and tribal cultural resources (significant tribal cultural resources). Because the No Project Alternative would not involve construction, the potentially significant cultural resources, tribal cultural resources, and noise impacts would not occur. Impacts to biological resources also would not occur under this alternative because no change in the condition of the site would occur. The contaminated

soils with potential to release hazardous materials would remain on the project site and no disposal of these soils would occur. The No Project Alternative would also avoid all other less than significant impacts of the proposed project.

The No Project Alternative would not meet any of the objectives of the proposed project, and the benefits of the proposed project would not be realized under the No Project Alternative. This alternative would leave the site as-is and the proposed project would not be constructed. Therefore, this alternative would not provide multi-family market rate and below market rate housing to address the City's supply need and RHNA. In addition, no upgrades to the site would occur to increase energy efficiency, water conservation, or transportation facilities.

8.5.2 Reduced Density Alternative

8.5.2.1 Description

The Reduced Density Alternative would develop a multi-family residential and church project similar to the proposed, with less residential density to decrease the severity of potential impacts of the project. The Zone Change and General Plan Amendment proposed by the project would be required to implement this alternative. Under the Reduced Density Alternative, development of the site would occur within the same footprint of the proposed project, but the number of residential dwelling units would be decreased by approximately 25 percent, for a total of 194 dwelling units. This alternative would not rely on the California Density Bonus Law, and the on-site density would be approximately 25 du/ac, 5 du/ac less than the maximum 30 du/ac allowed per the proposed R-5-30 zoning.

Vehicular trips under the Reduced Density Alternative would be reduced to 1,161 ADT and residential building area would be reduced by approximately 25 percent to 262,785 SF. The height of the proposed residential structures would remain three to four stories but one to three fewer buildings would be constructed on the residential site (depending on the building type). Other components and improvements under this alternative would be substantially the same as the proposed project, such as the new church building and associated improvements on the church site, common amenity areas, access driveways, landscaping, hardscape improvements, and utility improvements.

8.5.2.2 Comparative Environmental Analysis

Aesthetics

The Reduced Density Alternative would result in reduced aesthetic impacts to the proposed project given it would result in the same type of but fewer residential buildings. Consistent with the proposed project, this alternative would not result in significant impacts related to scenic vistas, scenic resources, or light and glare. The Reduced Density Alternative would also be consistent with the applicable regulations regarding scenic quality but would decrease the FAR of the residential site given less floor area would be constructed. Similar changes in the visual character of the area would occur under this alternative but the difference in density compared to surrounding land uses would be reduced from the proposed project. The Reduced Density Alternative would incrementally reduce the less than significant aesthetic impacts associated with the proposed project.

Air Quality

The Reduced Density Alternative would result in less air pollutant emissions when compared to the proposed project with construction of fewer residential structures and operation of less residential buildings generating fewer trips. Construction emissions would decrease only slightly, as the majority of site preparation and grading would require the same intensity of construction as under the proposed project. Greater reductions in pollutant emissions generated by operations would occur because ADT would be reduced by 25 percent. As a result, the Reduced Density Alternative would incrementally reduce the less than significant air quality impacts associated with the project.

Biological Resources

As construction of the Reduced Density Alternative would occur within the same grading footprint as the proposed project, impacts to biological resources would be the same as would occur with implementation of the proposed project. Potentially significant but mitigable impacts to nesting birds, sensitive natural communities, and wetlands would occur and mitigation measures BIO-1 through BIO-3 would be required to reduce these potential impacts below a level of significance. Impacts to biological resources under the Reduced Density Alternative would be significant but mitigable.

Cultural Resources

Construction of the Reduced Density Alternative would occur within the same grading footprint and require similar ground-disturbing activities to the proposed project. Therefore, impacts to cultural resources would be the same as those that would occur with the project. Potentially significant but mitigable impacts to archaeological resources would occur and mitigation measures CUL-1 through CUL-10 would be required to reduce these potential impacts below a level of significance. Impacts to cultural resources under the Reduced Density Alternative would be significant but mitigable.

Energy

Similar to the discussion of air quality impacts above, the Reduced Density Alternative would have slightly decreased energy resource impacts compared to the proposed project. The construction of fewer residential structures would result in slight decreases in the amount of energy required to construct the proposed residential buildings and operation of a smaller number of residential dwelling units would reduce energy use for building operation as well as vehicle trips. Therefore, the Reduced Density Alternative would incrementally reduce the less than significant energy impacts associated with the project.

Greenhouse Gas Emissions

Similar to the discussion of air quality impacts above, the Reduced Density Alternative would have slightly decreased GHG emissions impacts in comparison with proposed project. The decreased residential building area to be constructed would reduce the total amount of construction activity and associated GHG emissions. During operation, slight decreases in GHG emissions from energy use would occur and a greater decrease in GHG emissions due to vehicle trips would occur. The Reduced Density Alternative would be required to implement measures from the CAP Checklist but would provide fewer charging stations and trees given the decreased parking requirements. As such, the Reduced Density Alternative would incrementally reduce the less than significant GHG impacts associated with the project.

Hazards and Hazardous Materials

The Reduced Density Alternative would occur within the same grading footprint as the proposed project and would require ground-disturbing activities that would encounter contaminated soils consistent with the proposed project. Therefore, a potentially significant but mitigable impact would occur. Less than significant impacts related to the use of hazardous materials, the location of schools, airport hazards, emergency response, and wildland fires would remain less than significant under the Reduced Density Alternative given the same land use would be constructed. Impacts related to hazards and hazardous materials under the Reduced Density Alternative would be significant but mitigable and substantially similar to those associated with the proposed project.

Land Use and Planning

Under the Reduced Density Alternative, the site would continue to be developed with multi-family residential and church uses. The same project footprint would be developed and no community division would occur. This alternative would also incorporate the noise-reducing project design features described in Section 3.6 to ensure compatibility with General Plan interior noise standards. Therefore, land use impacts would be less than significant under this alternative.

Noise

This alternative would result in similar construction noise and vibration activities when compared to the proposed project. As such, construction period noise impacts would be less than significant and construction vibration impacts would still be potentially significant with mitigation measure NOI-1 required. The less than significant impacts associated with stationary and mobile sources would be decreased under this alternative given fewer HVAC units would be installed and fewer mobile trips would be generated. There would still be no impact related to airport noise levels. The Reduced Density Alternative would have significant but mitigable construction noise and vibration impacts and would incrementally reduce less than significant noise impacts associated with operation of the project.

Population and Housing

The Reduced Density Alternative would provide 194 new residential dwelling units on the site, which would represent a smaller increase in the City's population than under the proposed project. Consistent with the project, no residential units would be removed given none occur on-site. Given the slight decrease in population that would be induced, the Reduced Density Alternative would incrementally reduce the less than significant population and housing impacts associated with the proposed project.

Transportation

Under the Reduced Density Alternative, the project would generate approximately 1,161 ADT. The same active transportation improvements would be constructed and impacts related to circulation plans would be less than significant. The project would add fewer vehicle trips to the City's circulation system but would remain responsible for roadway improvements at intersections that do not achieve General Plan standards. VMT impacts would be decreased but would remain significant and implementation of infrastructure improvements pursuant to the City's VMT Exchange Program and Safe Routes to Schools Program would be required. No change in impacts related to hazardous design features or emergency access would occur. The Reduced Density Alternative would result in incrementally reduced potentially significant but mitigable VMT impacts.

Tribal Cultural Resources

Similar to the discussion of cultural resources impacts for the Reduced Density Alternative, impacts to tribal cultural resources would not be altered by this alternative given the same footprint would be developed. Potentially significant but mitigable impacts to tribal cultural resources would occur and mitigation measures CUL-1 through CUL-10 would be required under the Reduced Density Alternative.

8.5.2.3 Conclusion

The Reduced Density Alternative would reduce the severity of the less than significant and significant but mitigable impacts associated with air quality, energy, GHG emissions, noise, population and housing, and transportation. Significant but mitigable impacts to biological resources (sensitive species, sensitive habitats, wetlands), cultural resources (archaeological resources), hazards and hazardous materials (release of hazardous materials), transportation (VMT), and tribal cultural resources (significant tribal cultural resources) would remain the same under the Reduced Density Alternative given the development footprint and grading activity would remain the same. Significant land use and planning impacts (consistency with land use plans) would continue to occur and require mitigation for interior noise exposure. Less than significant land use and planning impacts of the Reduced Density Alternative would be substantially similar to those related to the project.

The Reduced Density Alternative would, equally with the proposed project, meet the objective of providing a new modern church facility on the site that integrates with the existing education buildings to allow for the continued use of the church and private school. This alternative would meet the other five project objectives but to a lesser degree than the proposed project because of the reduced number of residential dwelling units that would be created. The decrease in dwelling units would decrease the housing stock to be provided and would detract from the project's ability to provide below market rate units. Under this alternative, the residential site would be utilized for multi-family residences but would not provide the same mix of unit types or affordability levels to assist the City in satisfying its RHNA.

8.5.3 Reduced Footprint Alternative

8.5.3.1 Description

The Reduced Footprint Alternative was developed to avoid development within the wetland area on the project site and incorporate a 50-foot buffer from the wetland drainage. Development would be focused on the eastern portion of the residential site. Under the Reduced Footprint Alternative, 258 residential dwelling units would be constructed consistent with the proposed project, but the residential buildings would be concentrated more densely in the eastern portion of the residential site. The new church building and associated improvements on the church site would be the same as the proposed project. The Zone Change and General Plan Amendment proposed by the project would be required to implement this alternative. As the Reduced Footprint Alternative would construct the same number of dwelling units, trip generation would be the same as for the proposed project and the proposed Felicita Road widening and intersection improvements would occur. The primary project entrance to the residential development from Felicita Road would be eliminated under this alternative to avoid crossing the undeveloped area and drainage that would remain at the western edge of the project site. With these exceptions, other components and improvements under this alternative would be similar to those for the proposed project, such as the common amenity areas, landscaping, hardscape improvements, and utility improvements. However, to accommodate the decrease in developable area, some landscaping and useable open space

area would be decreased in exchange for the open space that would remain in the western portion of the site and parking areas for the residential development would be decreased to the minimum required amount of 331 spaces. No change in the number or height of the proposed buildings would occur under this alternative.

8.5.3.2 Comparative Environmental Analysis

Aesthetics

The Reduced Footprint Alternative would alter the visual character of the site with a compact residential development focused on a smaller portion of the residential site. This alternative would not result in significant impacts related to scenic vistas or scenic resources and light and glare impacts would remain less than significant given the use of similar building and lighting materials. While specific plans for the Reduced Footprint Alternative have not been developed, it is assumed this alternative would also be consistent with the applicable regulations regarding scenic quality and development intensity of the residential site in a different configuration. Given the smaller development footprint but the same number of residential units, residential buildings under this alternative would be configured closer together and building forms would be more homogeneous than the proposed project. In addition, all residential buildings would likely be four stories compared to a mix of three to four stories of the proposed project. Visually, this would result in a higher-intensity development with less diverse building forms and buildings at a greater scale compared to the proposed project. Changes to the visual character and quality of the area would be greater than those of the project under this alternative and may require additional design treatments to reduce the mass of the built elements. Aesthetics impacts under the Reduced Footprint Alternative would be less than significant, but the severity would be greater than those that would occur under the project.

Air Quality

The Reduced Footprint Alternative would result in similar but reduced air pollutant emissions when compared to the proposed project because it would involve development of a smaller area. Site preparation, grading, and paving would be less intensive and result in less pollutant emissions. Operation of the Reduced Footprint Alternative would not alter pollutant emissions given the same number of dwelling units as the proposed project and church would be constructed. Therefore, the Reduced Footprint Alternative would incrementally reduce the less than significant construction-period air quality impacts associated with the project.

Biological Resources

Construction under the Reduced Density Alternative would avoid the wetland drainage area on the western portion of the project site (refer to Figure 4.3-1). No direct impact to wetlands would occur under this alternative. Avoidance of the western portion of the project site would also reduce the area of non-native grassland that would be removed. Therefore, the severity of significant but mitigable impacts to non-native grassland would be reduced. No change to the significant but mitigable impact to sensitive nesting birds would occur under this alternative because trees and vegetation would still be removed during construction. Potential impacts to wetland habitat and wetlands would be eliminated under the Reduced Density Alternative while significant but mitigable impacts to non-native grassland would be reduced and impacts to sensitive species would remain significant and mitigable.

Cultural Resources

The smaller development area of the Reduced Footprint Alternative would incrementally decrease the potential to encounter archaeological resources during construction. However, ground-disturbing activities would still be required within the remainder of the project site and impacts to archaeological resources would be significant and mitigable. There would still be no impact related to historical resources and human remains. The potential for impacts to cultural resources would be slightly reduced under the Reduced Footprint Alternative but would remain significant and mitigable.

Energy

Similar to the discussion of air quality impacts above, the Reduced Footprint Alternative would have a smaller development footprint thereby requiring slightly decreased energy resources during site preparation and grading. No change in the number of dwelling units and church development would occur and energy use for building operation and vehicle trips would be consistent with that of the project. Therefore, the Reduced Footprint Alternative would incrementally reduce the less than significant energy impacts associated with project construction.

Greenhouse Gas Emissions

Similar to the discussion of air quality impacts above, the smaller development footprint of the Reduced Footprint Alternative would slightly decrease GHG emissions as a result of less intensive site preparation and grading. Operational GHG emissions would remain the same and CAP measures would be required to be incorporated into the project. However, it is likely that in-lieu fees would be required in place of on-site tree cover given the reduced developable area under this alternative. The Reduced Footprint Alternative would incrementally reduce the less than significant GHG emissions impacts associated with the project.

Hazards and Hazardous Materials

The Reduced Footprint Alternative would not avoid the contaminated soil area located in the southeastern corner of the residential site; therefore, impacts related to the release of hazardous materials would remain significant and mitigable. No change in the impacts related to the use of hazardous materials, the location of schools, airport hazards, or wildland fires would occur. The elimination of the second driveway proposed on Felicita Avenue would incrementally increase hazards related to emergency response. Impacts related to hazards and hazardous materials under the Reduced Footprint Alternative would be significant but mitigable and substantially similar to those associated with the proposed project.

Land Use and Planning

Under the Reduced Footprint Alternative, the site would continue to be developed with multi-family residential and church uses. The development footprint would be decreased and no community division would occur. The land use and intensity of development would remain consistent with the proposed zoning and land use designations. The closer configuration of residential buildings may provide additional shielding, decreasing the number of residential units exposed to noise levels requiring enhanced construction. This alternative would incorporate the noise-reducing project design features described in Section 3.6 to ensure compatibility with General Plan interior noise standards. Therefore, land use impacts

would be less than significant under this alternative and would be similar when compared to those of the proposed project.

Noise

The Reduced Footprint Alternative would result in similar construction noise and vibration activities when compared to the project but would concentrate these activities within the eastern portion of the residential site. As such, construction period noise impacts would be less than significant and construction vibration impacts would still be potentially significant with mitigation measure NOI-1 required. No change to less than significant noise impacts resulting from mobile sources would occur. Stationary sources would be concentrated in the eastern portion of the site and may incrementally increase noise levels at properties surrounding this area, but noise levels would remain below the respective limits. There would still be no impact related to airport noise levels. The Reduced Footprint Alternative would have impacts that are substantially similar when compared to those of the project, including significant but mitigable construction vibration impacts and less than significant construction and operation noise impacts.

Population and Housing

No change to population and housing impacts would occur under the Reduced Footprint Alternative, as the same number and type of dwelling units would be created on the site. No existing housing on the site would be removed and the additional housing would be within the population projections for the City. Impacts related to population and housing would be less than significant with this alternative.

Transportation

As the Reduced Footprint Alternative would construct the same number of dwelling units and off-site transportation facilities as the proposed project, transportation impacts would be substantially similar to those of the proposed project. The removal of the driveway to Felicita Road would route additional trips through the Brotherton Road driveway but this change in circulation is not anticipated to substantially alter the improvements that would be required to achieve compliance with General Plan standards. Impacts related to VMT would not change given the same land uses would be constructed and no hazardous design features would be constructed. One point of emergency access would be eliminated under this alternative; however, the project site would remain accessible for emergency operations and impacts would be less than significant. The Reduced Footprint Alternative would result in substantially similar transportation impacts compared to the project and transportation impacts related to VMT would be significant but mitigable.

Tribal Cultural Resources

Similar to the discussion of cultural resources impacts above, the smaller footprint proposed under this alternative would incrementally decrease the potential to encounter tribal cultural resources during construction; however, the potential to encounter these resources would remain. Therefore, the potential for impacts to tribal cultural resources would be slightly reduced under the Reduced Footprint Alternative but would remain significant and mitigable.

8.5.3.3 Conclusion

The Reduced Footprint Alternative would avoid the significant and mitigable impacts associated with wetland habitat and wetlands and would reduce the severity of the significant and mitigable impact to

non-native grassland. This alternative would slightly reduce the potential to encounter cultural resources (archaeological resources) and tribal cultural resources (significant tribal cultural resources); impacts to these resources would remain significant but mitigable. Similarly, a slight decrease in construction area would incrementally decrease the severity of impacts to air quality, energy, and GHG emissions. No substantial change in the significant but mitigable impacts related to hazards and hazardous materials (release of hazardous materials), noise (construction-related vibration), or transportation (VMT) would occur. Land use and planning impacts would be less than significant similar to the proposed project. Aesthetics impacts would be less than significant but greater in severity compared to the proposed project given the consolidation of all residential units in the eastern portion of the site that would result in higher-intensity buildings with less variety in form. In addition, no substantial change in less than significant impacts related population and housing would occur under this alternative.

The Reduced Footprint Alternative would meet most of the project objectives but would constrain the extent of the proposed development such that the objective to provide flexibility in unit types, sizes, and affordability levels would not be achieved. The proposed site design includes one-, two-, and three-bedroom units with a variety of floor plans. Concentrating units in a smaller area would require either taller buildings to maintain the same floor plan options or denser development with smaller units. Taller buildings would require additional features such as elevators and more complex fire safety systems that would increase developer costs and reduce affordability options. Reducing unit size would eliminate the variety of options currently proposed. While no specific site plan has been developed for evaluation of this alternative, the constraints in the project footprint that would occur under this alternative would reduce the degree to which the objectives would be achieved.

8.5.4 Planned Office Land Use Alternative

8.5.4.1 Description

The Planned Office Land Use Alternative was developed to assess potential impacts that would occur without the General Plan Amendment proposed by the project. A Zone Change would still be required to implement this alternative and revise the zoning designation to Planned Development – Office to be consistent with the General Plan land use designation. The existing land use designation of PO allows a maximum FAR of 2.0; therefore, this alternative considers demolition of the church and school buildings, and buildout of 1,291,995 SF of office space on the project site. The office buildings are assumed to be three stories in height. According to the CalEEMod defaults for the office land use, this alternative would generate 4,450 ADT. It is assumed that the office land use would be developed within the same development footprint as the proposed project and the Felicita Road widening and intersection improvements would occur. The analysis related to this alternative assumes the office land use would comply with applicable development regulations related to parking, landscape, hardscape, and height.

8.5.4.2 Comparative Environmental Analysis

Aesthetics

The Planned Office Land Use Alternative would alter the visual character of the site with a large office development across the project site. Consistent with the proposed project, this alternative would not result in significant impacts related to scenic vistas or scenic resources. Light and glare impacts would remain less than significant given the use of similar building materials and lighting compliant with City regulations but could be slightly greater if the office building(s) would include large glass windows or

curtain walls. While specific plans for this alternative have not been developed, it is assumed this alternative would also be consistent with the applicable regulations regarding scenic quality and development intensity of the site for the Planned Development – Office zone. This alternative would result in a higher-intensity development that is inconsistent with surrounding land uses, thereby increasing the degree of change to the visual character and quality of the area. Aesthetics impacts under this alternative would remain less than significant, but the severity would be greater than under the proposed project.

Air Quality

Construction and operation of the larger buildings would increase pollutant emissions and increase ADT, though no exceedance of the applicable thresholds is anticipated to occur. As described further in Section 4.2.5.1, buildout of the PO land use designation on the project site would result in 54.8 pounds per day of VOC and 22.1 pounds per day of NO_X emissions, which is an increase compared to the proposed project. This alternative would not result in the siting of new sensitive receptors. Overall, the Planned Office Land Use Alternative would increase the severity of the less than significant air quality impacts associated with the project.

Biological Resources

As this alternative would occur within the same footprint as the proposed project, impacts to biological resources would be the same as those that would occur with implementation of the proposed project. Potentially significant but mitigable impacts to nesting birds, sensitive natural communities, and wetlands would occur and mitigation measures BIO-1 through BIO-3 would be required to reduce these potential impacts below a level of significance. Impacts to biological resources under the Planned Office Land Use Alternative would be significant but mitigable.

Cultural Resources

Construction of the Planned Office Land Use Alternative would occur within the same footprint and require the same ground-disturbing activities as the proposed project. Therefore, impacts to cultural resources would be the same as those that would occur with the project. Potentially significant but mitigable impacts to archaeological resources would occur and mitigation measures CUL-1 through CUL-10 would be required to reduce these potential impacts below a level of significance. Impacts to cultural resources under this alternative would be significant but mitigable.

Energy

Similar to the discussion of air quality impacts above, the Planned Office Land Use Alternative would construct more building area and generate increased vehicle trips, thereby increasing energy requirements compared to the proposed project. While energy resources would be increased, this alternative would not result in excessive energy consumption or conflicts with energy plans. This alternative would increase the severity of the less than significant energy impacts associated with the project.

Greenhouse Gas Emissions

Similar to the discussion of air quality impacts above, the increase in building space and ADT would increase GHG emissions. It is anticipated this alternative would require implementation of additional

applicable CAP measures compared to the project. Therefore, the Planned Office Land Use Alternative would increase the severity of the less than significant GHG impacts associated with the project.

Hazards and Hazardous Materials

The Planned Office Land Use Alternative would result in construction within the same footprint and the release of hazardous materials would remain significant and mitigable. No acutely hazardous materials would be required to construct and operate an office land use; therefore, impacts related to the use of hazardous materials and the location of schools would be consistent with the proposed project. Impacts related to airport hazards and wildland fires would also be consistent with those of the project given the same project site would be utilized. Impacts related to hazards and hazardous materials under this alternative would be significant but mitigable and substantially similar to those associated with the proposed project.

Land Use and Planning

Under this alternative, the site would be developed with an office land use consistent with the existing General Plan land use designation for the site. The development footprint would be the same as that of the proposed project and no community division would occur. The land use and intensity of development would be consistent with the proposed zoning and land use designations. As no residential units would be constructed, impacts related to noise exposure would be eliminated. It is assumed this alternative would be consistent with applicable land use plans and policies related to environmental issues. Therefore, land use impacts would be less than significant under this alternative.

Noise

The Planned Office Land Use Alternative would result in similar construction noise and vibration activities when compared to the project, though they would occur over a longer time period than for the proposed project. Construction noise impacts would be less than significant and construction vibration impacts would still be potentially significant but mitigable. This alternative would increase vehicular noise compared to the proposed project. Stationary source noise would incrementally increase but noise levels would remain below the respective property line limits. There would still be no impact related to airport noise levels. Therefore, this alternative would incrementally increase impacts compared to the project but would not change the significance of the significant but mitigable construction vibration impacts and less than significant construction noise and operation noise impacts.

Population and Housing

Under this alternative, no new residential units would be constructed. The potential office uses are anticipated to be used by employees from the region; therefore, no impact to population or housing would occur under this alternative.

Transportation

Based on CalEEMod defaults related to buildout of the Planned Office Land Use Alternative, this alternative would generate 4,450 ADT, an increase of 2,902 ADT compared to the proposed project. Improvements to surrounding roadways and alternative transportation facilities would continue to occur under this alternative consistent with applicable transportation plans. As a result of increased daily trips, this alternative would increase VMT, which is positively correlated with ADT, and would be required to

implement applicable measures consistent with the City's VMT Exchange Program and Safe Routes to School Program to reduce the potentially significant impact. Consistent with the proposed project, no hazardous design features would be constructed and emergency access would be provided consistent with City requirements. This alternative would increase the severity of the significant but mitigable transportation (VMT) impacts compared to the proposed project.

Tribal Cultural Resources

Similar to the discussion of cultural resources impacts above, impacts to tribal cultural resources would not be changed under this alternative given the same footprint would be disturbed. Potentially significant but mitigable impacts to tribal cultural resources would occur under the Planned Office Land Use Alternative.

8.5.4.3 Conclusion

The Planned Office Land Use Alternative would eliminate the less than significant population impact of the proposed project. As the same footprint would be developed, significant but mitigable construction-related impacts to biological resources, cultural resources, hazards and hazardous resources, and tribal cultural resources would be the same as for the proposed project. However, the increase in building area and vehicle trips that would be generated under this alternative would increase the severity of the less than significant impacts related to air quality, energy, and GHG emissions, as well as the significant but mitigable impacts related to construction vibration and transportation (VMT). Aesthetics impacts would also be greater given the more intensive development that would be constructed under this alternative and potential for increased glare effects associated with an office building.

The Planned Office Land Use Alternative would not meet any of the six project objectives, as no housing units would be created and existing on-site uses would be replaced with office uses. Additionally, this alternative would not meet the project's objective to construct a new modern church facility. This alternative would result in a development consistent with the planned land use for the site but would not generate housing units that would contribute to the City's housing stock.

8.6 Comparative Summary of Impacts

As described throughout Section 8.5, above, the range of alternatives analyzed above would result in substantially similar or decreased impacts in comparison with the proposed project. Table 8-1, *Comparison of Project and Alternative Impacts,* provides a summary of the potential impacts that would occur under each alternative, as described above. In addition, where the alternative would result in the same impact conclusion as the proposed project, Table 8-1 indicates whether the alternative would reduce, increase, or keep consistent the degree of that impact.

Table 8-1
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Environmental Topic	Proposed Project	No Project Alternative	Reduced Density Alternative	Reduced Footprint Alternative	Planned Office Land Use Alternative
Aesthetics	LS	N	LS<	LS>	LS>
Air Quality	LS	N	LS<	LS<	LS>
Biological Resources	SM	N	SM=	SM<	SM=
Cultural Resources	SM	N	SM=	SM<	SM=
Energy	LS	N	LS<	LS<	LS>
Greenhouse Gas Emissions	LS	N	LS<	LS<	LS>
Hazards and Hazardous Materials	SM	N	SM=	SM=	SM=
Land Use and Planning	LS	N	LS=	LS=	LS<
Noise	SM	N	SM<	SM=	SM>
Population and Housing	LS	N	LS<	LS=	N
Transportation	SM	N	SM<	SM=	SM>
Tribal Cultural Resources	SM	N	SM=	SM<	SM=

SM = significant but mitigable impacts; LS = less than significant impacts; N = no impacts
< represents comparatively reduced impact relative to the project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the project

8.7 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the project. CEQA Guidelines Section 15126.6(e)(2) also requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the environmentally superior alternative. This alternative would avoid the significant and mitigable and less than significant impacts that would occur with the proposed project. However, the No Project Alternative does not meet any of the project objectives.

Of the remaining alternatives, the environmentally superior alternative is the Reduced Density Alternative. This alternative would meet the project objectives, although to a lesser degree than the proposed project given the reduced number of residential dwelling units that would be provided within the City. This alternative would not eliminate any significant impacts of the project but would reduce the severity of impacts related to aesthetics, air quality, energy, GHG emissions, noise, population and housing, and transportation. No increase in the severity of impacts would occur under the Reduced Density Alternative and all potentially significant impacts would be mitigable below a level of significance.

9.0 REFERENCES

American Society of Heating, Refrigeration, and Air Conditioning Engineers. 2021. ASHRAE 2021 Handbook.

Bay Area Air Quality Management District (BAAQMD). 2023. 2022 CEQA Guidelines, Chapter 4 – Screening for Criteria Air Pollutants and Precursors. Revised April 20. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?sc_lang=en.

Bean, Lowell John, and Florence C. Shipek. 1978. Luiseño in California. Edited by Robert F. Heizer, pp. 550-563. Handbook of North American Indians, vol. 8. William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Bethel Baptist Church. 2023. Bethel Baptist Church Archives. On file at Bethel Baptist Church.

1999. Bethel Baptist Church 50th Anniversary, 1949-1999. Self-published. On file at Bethel Baptist Church, 855 Brotherton Road, Escondido, CA.

California Air Pollution Control Officers Association (CAPCOA). 2022. User's Guide for CalEEMod Version 2022.1. Available at: http://www.caleemod.com/.

California Air Resources Board (CARB). 2026a. iADAM: Air Quality Data Statistics. Top 4 Summary. Available at: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed January 13.

2026b. Current California GHG Emission Inventory Data. 2000-2023 GHG Inventory (2025 Edition). Available at: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed January 13.

2024a. California Ambient Air Quality Standards. Available at: https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards. Accessed January 29.

2024b. Overview: Diesel Exhaust and Health. Available at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed January 29.

2024c. Clean Car Standards – Pavley, Assembly Bill 1493. Available at: http://www.arb.ca.gov/cc/ccms/ccms.htm. Accessed December.

2023. Emissions Inventory EMFAC2021. Available at: https://arb.ca.gov/emfac/. Accessed July 2023.

2022. 2022 Scoping Plan for Achieving Carbon Neutrality. November 16. Available at: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents.

2020. Air Cleaning Devices for the Home. November 6. Available at: https://ww2.arb.ca.gov/resources/fact-sheets/air-cleaning-devices-home.

California Air Resources Board (CARB; cont.)
2016. Ambient Air Quality Standards. May 4. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-03/aaqs2_0.pdf.

2015. Risk Management Guidance for Stationary Sources of Air Toxics. Available at: https://www.arb.ca.gov/toxics/rma/rmgssat.pdf.

2013. California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley). Available at: https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley. Accessed January 13, 2024

2009. State Implementation Plan Background. April 13. Available at: https://ww2.arb.ca.gov/our-work/programs/california-state-implementation-plans/about.

2007. 1990-2004 Greenhouse Gas Inventory – By Economic Sector. November 19. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/cc/ghg_inventory_sector_all_90-04_AR4.pdf.

2005. Air Quality and Land Use Handbook: A Community Health Perspective. April. Available at: https://ww3.arb.ca.gov/ch/handbook.pdf.

California Department of Conservation (DOC). 2022. Farmland Mapping & Monitoring Program. Available at: https://www.conservation.ca.gov/dlrp/fmmp/.

California Department of Conservation Geologic Energy Management Division (CalGEM). 2022. CalGEM Well Finder. Available at: https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx. Accessed September 22, 2022.

California Department of Education (CDE). 2024. Data and Statistics. Available at: https://www.cde.ca.gov/ds/.

California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zone Viewer. Available at: https://egis.fire.ca.gov/FHSZ/. Accessed February 9, 2024.

2022. Fire Hazard Severity Zone Map. Available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022.

California Department of General Services (CDGS). 2022. California Building Standards Code. Available at: https://www.dgs.ca.gov/BSC/Codes.

California Department of Motor Vehicles (DMV). 2024. DMV Statistics. Available at: https://www.dmv.ca.gov/portal/news-and-media/dmv-statistics/. Accessed January 2024.

California Department of Resource Recycling and Recovery (CalRecycle). 2022a. Sycamore Landfill Site Activity Details. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1798?siteID=2871.

2022b. Otay Landfill Site Activity Details. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1790?siteID=2863.

California Department of Tax and Fee Administration. 2024. Motor Vehicle Fuel 10 Year Reports. Available at: https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.html. Accessed January 12, 2024

California Department of Toxic Substances Control (DTSC). 2024. EnviroStor. Available at: https://www.envirostor.dtsc.ca.gov/public/.

California Department of Transportation (Caltrans). 2024. Traffic Census Program, 2021 Truck Traffic Volumes. Available at: https://dot.ca.gov/programs/traffic-operations/census.

2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. September. Available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/02/HHRA-Note-3-June2020-Revised-May2022A.pdf.

California Energy Commission (CEC). 2022. CCR Title 24 Part 6, 2022 Building Energy Efficiency Standards Summary. Available at: https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf.

2021. Final 2020 Integrated Energy Policy Report Update. Available at: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update. Accessed January 12, 2024.

2020. *2020 Power Content Label - Southern California Edison*. Available at: https://www.energy.ca.gov/filebrowser/download/3902.

2018. California Energy Demand 2018-2030 Revised Forecast. Available at: https://www.energy.ca.gov/publications/2018/california-energy-demand-2018-2030-revised-forecast. Accessed January 12, 2024.

2014. California Energy Demand Updated Forecast, 2015-2025. Available at: https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_13-EnergyConsump/68441_CEC-200-2014-009-SD.pdf. Accessed January 12, 2024.

California Gas and Electric Utilities (CGEU). 2020. 2020 California Gas Report. Available at: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed January 12, 2024.

California Public Utilities Commission (CPUC). 2023. Natural Gas and California. Available at: https://www.cpuc.ca.gov/natural_gas/. Accessed January 12, 2024.

2016. Available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2016/2016-oga-reports/final12302015section913_6report.pdf. Accessed January 12, 2024.

California Regional Water Quality Control Board (RWQCB). 1994. San Diego Region #9, Water Quality Control Plan for the San Diego Basin, September 8, 1994. Available at: https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/.

California State Water Resources Control Board (SWRCB). 2022. GeoTracker Database. Available at: https://geotracker.waterboards.ca.gov/map. Search performed September 22, 2022.

Carrico, Richard L. 2018. Strangers in a Stolen Land: Indians of San Diego County from Prehistory to the New Deal. Sunbelt Publications, San Diego.

2008. Ethnohistoric Period in Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study. Prepared for the Metropolitan Wastewater Department, City of San Diego by ASM Affiliates, Encinitas, California.

Carrier. 2008. 2008. 50PG03 – 28 Product Data. Available at: https://www.shareddocs.com/hvac/docs/1009/Public/01/50PG-06PD.pdf.

2005. Product Data. 38BRC (60 Hz) 12 SEER Air Conditioner. Available at: https://www.shareddocs.com/hvac/docs/1009/Public/02/38BRC-14PD.pdf.

Cline, Lora L. 1984. Just Before Sunset. J and L Press, Jacumba, California.

Department of Toxic Substances Control (DTSC). 2022. EnviroStor Database. and available at: https://envirostor.dtsc.ca.gov/public/. Search performed September 22, 2022.

2020. Human Health Risk Assessment Note 3. Available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/02/HHRA-Note-3-June2020-Revised-May2022A.pdf.

2008. Interim Guidance for Sampling Agricultural Properties (Third Revision). August 7, 2008. Available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf.

Escondido, City of (City). 2024. Major Development Activity Dashboard. Available at: https://cityofescondido.maps.arcgis.com/apps/dashboards/3df9dd5f830a4db4a6dce61747906ae8.

2023. City of Escondido Sixth Cycle Housing Element 2021-2029. Adopted August 11, 2021, Amended March 22, 2023. Available at: https://www.escondido.org/Data/Sites/1/media/Planning/HCIS/ADOPTED_HE_cleanCopy_vm_1.pdf.

2022. City of Escondido Demographics. Accessed January 2024. Available at: https://www.escondido.org/demographics.

2021a. City of Escondido Climate Action Plan. Adopted March 10. Available at: https://www.escondido.org/climate-action-plan-documents.aspx.

2021b. Climate Action Plan Consistency Review Checklist. Available at: https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/Final/Escondido_CAPChecklistFinal3.31.2021.pdf.

Escondido, City of (City) (cont.)

2021c. Guidance for Demonstrating Consistency with the City of Escondido Climate Action Plan for Discretionary Projects Subject to CEQA. July 21. Available at: https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/Final/Escondido_ThresholdsMemoFinal3.10.2021.pdf.

2021d. City of Escondido 6th Cycle Housing Element 2021-2029. March. Available at: https://www.hcd.ca.gov/housing-elements/docs/escondido-6th-draft032621.pdf.

2021e. Traffic Impact Analysis Guidelines. April. Available at: https://www.escondido.org/Data/Sites/1/media/Engineering/TIACRAIG/EscondidoTransportationImpactAnalysisGuidelines2021.pdf.

2020. Climate Action Plan. Available at: https://www.escondido.org/Data/Sites/1/media/Planning/ClimateActionPlan2021.pdf. Accessed January 12, 2024 .

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

2012b. 2012 Comprehensive General Plan Updated Volume I EIR. April. Available at: https://www.escondido.org/Volume-I-Draft-EIR.aspx.

2012c. Bicycle Master Plan. October. Available at: https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/DraftBicycleMasterPlan.pdf.

2001. Public Review Draft Escondido Subarea Plan Implementing the Multiple Habitat Conservation Program City Case File 95-25-GPIP. June. Available at: https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/environment/regional-habitat-conservation/habitat-management-draft-escondido-subarea-plan-2001-06-01.pdf.

Escondido Unified School District (EUSD). 2020. Facilities Master Plan. Available at: https://www.eusdplan.org/.

2018. School Facilities Needs Analysis. Prepared by Cooperative Strategies. March 12.

Federal Emergency Management Association (FEMA). 2021. National Flood Hazard Layer Viewer. Available at: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

Federal Highway Administration (FHWA). 2015. Guidelines for Visual Impact Assessment of Highway Projects. January. Available at: https://www.environment.fhwa.dot.gov/env_topics/other_topics/VIA_Guidelines_for_Highway_Projects.aspx.

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

FREY Environmental Inc. 2023. Phase II Environmental Site Assessment and Additional Soil Assessment 855 Brotherton Road Escondido, California. December 21.

2022. Phase I Environmental Site Assessment Bethel Baptist Church 855 Brotherton Road Escondido, California APNs 236-333-41-00 and 236-333-53-00. October 5.

Geocon Incorporated. 2022. Preliminary Geotechnical Investigation, Proposed Multi-story Apartment Housing Element 855 Brotherton Road Escondido, California. September 15.

Hargis+Associates, Inc. (H+A). 2019. Transmittal of Semiannual Monitoring Submittal, October 2019, Chatham Site, Escondido, California. December 12, 2019

HELIX Environmental Planning (HELIX). 2026. Air Quality and Greenhouse Gas Emissions Technical Report. January.

2025. Alexan Escondido Noise Report. February.

2024a. Historic Resource Evaluation Report. July.

2024b. Cultural Resources Survey. July.

Intergovernmental Panel on Climate Change (IPCC). 2014. Mitigation of Climate Change. Contribution of Working Group III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. Available at: https://www.ipcc.ch/report/ar5/wg3/.

2013. Climate Change 2013: The Physical Science Basis. Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Available at: https://www.ipcc.ch/site/assets/uploads/2018/03/WG1AR5_SummaryVolume_FINAL.pdf.

2007. Climate Change 2007: The Physical Science Basis, Summary for Policy Makers (Working Group Fourth Assessment Report). February. Available at: http://www.ipcc.ch/SPM2feb07.pdf.

Iowa Environmental Mesonet. 2023. Ramona Airport Windrose Plot. Available at: https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=RNM&network=CA_ASOS.

Kroeber, A.L. 1925.Handbook of California Indians. Bureau of American Ethnology of the Smithsonian Institution *Bulletin 78*. Republished lithographed edition 1970, Fulmer Brothers Press Taylor & Taylor, San Francisco.

Lightfoot, Kent G., and Otis Parrish. 2009.California Indians and the Environment. University of California Press, Berkeley.

Linscott, Law, and Greenspan (LLG). 2025. Local Mobility Analysis 855 Brotherton Road, Escondido, CA. December 10.

Luomala, Katherine. 1978. Tipai-Ipai in California. Edited by Robert F. Heizer, pp. 592-609. Handbook of North American Indians, vol. 8. William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Michael Baker International. 2023. Biological Resources Letter Report for the Alexan Escondido Project (Brotherton Road) – City of Escondido, County of San Diego, California. November 15.

MNS Engineers, Inc. 2024. Biological Resources Assessment for the Bethel Church Project. August 8.

Nasland Engineering. 2025a. City of Escondido Priority Development Project (PDP) SWQMP Escondido Church. April 30.

2025b. Preliminary Hydrology Study for Escondido Church. February 2.

2024. Preliminary Hydrology Study for Alexan Escondido. April 19.

2023. City of Escondido Priority Development Project (PDP) SWQMP Alexan Escondido. November 9.

National Aeronautics and Space Administration (NASA). 2024. Global Temperature. Available at: https://climate.nasa.gov/vital-signs/global-temperature/#:~:text=Earth's%20global%20average%20surface%20temperature,average%20from%201951%20to%201980. Accessed January 29.

2023. 2022 Fifth Warmest Year on Record, Warming Trend Continues. January 12. Available at: https://www.nasa.gov/press-release/nasa-says-2022-fifth-warmest-year-on-record-warming-trend-continues.

National Highway Traffic Safety Administration (NHTSA). 2022. Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks. Available at: https://www.federalregister.gov/documents/2022/05/02/2022-07200/corporate-average-fuel-economy-standards-for-model-years-2024-2026-passenger-cars-and-light-trucks. Accessed January 12, 2024.

National Oceanic and Atmospheric Administration (NOAA). 2024. Trends in Atmospheric Carbon Dioxide. Available at: https://www.esrl.noaa.gov/gmd/ccgg/trends. Accessed January 29.

Oberbauer, T., M. Kelly, and J. Buegge. 2008. Draft Vegetation Communities of San Diego County. *Based on* Preliminary Descriptions of the Terrestrial Natural Communities of California, Robert F. Holland, Ph.D., October 1986. February.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February. Available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

Ogden International. 1988. Road Travel Survey.

PBL Netherlands Environmental Assessment Agency (PBL). 2022. Trends in Global CO_2 and Total Greenhouse Gas Emissions, 2021 Summary Report. Available at: https://www.pbl.nl/sites/default/files/downloads/pbl-2022-trends-in-global-co2-and_total-greenhouse-gas-emissions-2021-summary-report_4758.pdf.

Rincon del Diablo Municipal Water District (RDDMWD). 2021. 2020 Urban Water Management Plan. June. Available at: https://rinconwater.org/wp-content/uploads/2021/07/2020-UWMP-OPTI.pdf.

Rogers, Thomas H. Geologic Map of California, Santa Ana Sheet, Scale 1:250,000

San Diego Association of Governments (SANDAG). 2025. 2025 Regional Plan. December. Available at: https://www.sandag.org/regional-plan/2025-regional-plan.

2023. Transportation Forecast Information Center. Available at: https://tfic.sandag.org/. Accessed July.

2021. Series 14 Regional Growth Forecast Documentation and Sustainable Communities Strategy Land Use Pattern Subregional Allocation. Available at: https://www.sandag.org/data-and-research/socioeconomics/-/media/BDDA150E39CD4946B53F20DB2E202DC5.ashx.

2020. 6th Cycle Regional Housing Needs Assessment Plan. July. Available at: https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/regional-initiatives/housing-land-use/regional-housing-needs-assessment/6th-cycle-regional-housing-needs-assessment-plan-2020-07-10.pdf.

2003. Final MHCP Plan. March. Available at: https://www.sandag.org/projects-and-programs/environment/regional-habitat-conservation.

2002. SANDAG's (Not So) Brief Guide to Vehicular Traffic Generation Rates for San Diego Region.

San Diego County Air Pollution Control District (SDAPCD). 2024. Attainment Status. Available at: https://www.sdapcd.org/content/sdapcd/planning/attainment-status.html#:~:text=An%20area%20is%20designated%20in,health%20or%20the%20public%20welfare. Accessed July 2023.

2023. 2022 Regional Air Quality Strategy (RAQS). March 9. Available at: https://www.sdapcd.org/content/sdapcd/planning.html.

2022. Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments. May. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/permits/air-toxics/Hot-Spots-Guidelines.pdf.

2021a. Rule 67.0.1 Architectural Coatings. Adopted February 10. Available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Prohibitions/APCD_R67-0-1-2021.pdf.

San Diego County Air Pollution Control District (SDAPCD) (cont.)
2021b. Rule 1210 Toxic Air Contaminate Health Risks – Public Notification and Risk Reduction. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/rule-archive/2021/Rule-1210-110421.pdf.

2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October. Available at: https://www.sdapcd.org/content/sdapcd/planning.html.

2009. Rule 55 Fugitive Dust Control. Adopted June 24. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-55.pdf.

1997. Rule 50 Visible Emissions. Adopted August 13. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-50.pdf.

1976. Rule 51 Nuisance. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-50.1.pdf.

San Diego, County of (County). 2024. Planning and Development Services Building Division. Available at: https://www.sandiegocounty.gov/content/sdc/pds/bldg.html.

2023. Consolidated Fire Code. April. Available at: https://www.sandiegocounty.gov/pds/docs/cosd-fire-code.pdf.

San Diego Gas & Electric (SDG&E). 2024. Our Company. Accessed February 2024. Available at: https://www.sdge.com/more-information/our-company.

2022. 2022 Individual Integrated Resource Plan of San Diego Gas & Electric Company. Available at: https://www.sdge.com/sites/default/files/regulatory/SDG%26E%202022%20Individual%20Integrated%20Resource%20Plan%20%28PUBLIC%29_0.pdf. Accessed January 12, 2024.

Sparkman, Philip Stedman. 1908. The Culture of the Luiseño Indians in University of California Publications in American Archaeology and Ethnology. 8(4):187-234.

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993).

State Water Resources Control Board (SWRCB). 2024. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/.

Times-Advocate. 1976. Baptists Open New Facility. *Times-Advocate*, Escondido, CA. Page B-9 April 9.

1975. Bethel Baptists Relocate. *Times-Advocate*, Escondido, CA. Page A-8. August 1.

1974. Church Permit Approved. *Times-Advocate*, Escondido, CA. Page A-9. May 14.

Trafzer, Clifford E., and Richard L. Carrico. 1992. American Indians: The County's First Residents. Chapter 4, in San Diego: An Introduction to the Region, edited by Philip R. Pryde. 3rd edition. Kendall/Hunt Publishing, Dubuque, Iowa.

True, D.L. 1990. Site Locations and Water Supply: A Perspective from Northern San Diego County, California in Journal of New World Archaeology. 7(4):37–60.

U.S. Department of Commerce Bureau of the Census (U.S. Census Bureau). 2022. QuickFacts, City of Escondido. Available at: https://www.census.gov/quickfacts/fact/table/sandiegocitycalifornia/PST045222. Accessed February 2024.

U.S. Department of Transportation (USDOT). United States Department of Transportation (USDOT). 2020. Legislation, Regulations, and Guidance: Intermodal Surface Transportation Efficiency Act of 1991 Information. Available at: https://www.fhwa.dot.gov/planning/public_involvement/archive/legislation/istea.cfm. Accessed January 12, 2024.

2008. Roadway Construction Noise Model.

U.S. Environmental Protection Agency (USEPA). 2024a. Criteria Air Pollutants. Available at: https://www.epa.gov/criteria-air-pollutants. Accessed January 29.

2024b. Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Clean Air Act. Updated September 10. Available at: https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a.

2022. Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990–2020. EPA 430-R-22-003. Available at: https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-2022-main-text.pdf.

2011. Haul Road Workgroup Final Report. Available at: https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf.

2002. Radon Zones Map. Available at: https://www.epa.gov/sites/default/files/2018-12/documents/radon-zones-map.pdf.

U.S. Geologic Survey (USGS). 1948; 7.5 minute Escondido, California Topographic Quadrangle.

Western Regional Climate Center. 2024. Western U.S. Climate Summaries, California, Escondido 2 (042863). Available at: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca4735. Accessed January 29.

White, Raymond C. 1963. Luiseño Social Organization in University of California Publications in American Archaeology and Ethnology. 48(2):91-194.

Wyle Laboratories. 1973. Development of Ground Transportation Systems Noise Contours for the San Diego Region.

10.0 LIST OF PREPARERS

City of Escondido (Lead Agency)

Ivan Flores, Principal Planner
Oscar Romero, Principal Planner
Jay Paul, Senior Planner

Environmental Impact Report

HELIX Environmental Planning
Joanne Dramko, Environmental Planning Discipline Leader
Tim Belzman, Principal Planner
Shelby Bocks, Project Manager
Erin Gustafson, Project Manager
Molly Ryan, Environmental Planner
Sydney Wells, Environmental Planner
Rebecca Kress, Senior GIS Specialist
Linda Garcia, Document Specialist

Air Quality, Greenhouse Gas Emissions, and Noise Reports

HELIX Environmental Planning
Joanne Dramko, Environmental Planning Discipline Leader
Victor Ortiz, Senior Air Quality Specialist
Jafar Al-Khalaf, Senior Noise Specialist
Tim Belzman, Project Manager
Martin Rolph, Air Quality Specialist
Shelby Bocks, Project Manager

Biological Resources Letter Report

Michael Baker International
Marisa Flores, Senior Biologist

MNS Engineers
Shelah Riggs, Principal Regulatory Specialist

Cultural Resources Survey, Historic Resource Evaluation Report

HELIX Environmental Planning
Mary Robbins-Wade, Principal Cultural Resources Specialist
Nicole Falvey, Cultural Resources Project Manager
James Turner, Senior Archaeologist
Teri Delcamp, Senior Architectural Historian

Geotechnical Investigation, Stormwater Management Investigation

Geocon Incorporated
Adam W. Hespeler, PG
Shawn Foy Weedon, GE
John Hoobs, CEG

Local Mobility Analysis

Linscott, Law and Greenspan, Engineers
John Boarman, P.E. Principal
Renald Espiritu, Transportation Engineer

Phase I and II Environmental Site Assessments

FREY Environmental
Joe Frey, Principal Certified Engineering Geologist
Ed Rands, Senior Project Engineer
Deanna Hoppe, Senior Staff Geologist
Mollie Banh, Project Engineer
Eli Appelgate, Staff Geologist

Preliminary Stormwater Quality Management Plan, Drainage Report

Nasland Engineering
Daniel Quinones, PE