Initial Study/Environmental Checklist and Mitigated Negative Declaration for the Parkview Townhomes Project Escondido, California

Prepared for
City of Escondido
Development Services Department, Planning Division
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Escondido, CA 92025

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1.0 Introduction

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended, and the CEQA Guidelines, as revised. This IS/MND evaluates the environmental effects of the Parkview Townhomes Project (project).

The IS/MND includes the following components:

- A Draft MND and the formal findings made by the City of Escondido (City) that the project would not result in any significant effects on the environment, as identified in the CEQA IS Checklist.
- A detailed project description.
- The CEQA IS Checklist, which provides standards to evaluate the potential for significant environmental impacts from the project and is adapted from Appendix G of the CEQA Guidelines. The project is evaluated in 21 environmental issue categories to determine whether the project's environmental impacts would be significant in any category. Brief discussions are provided that further substantiate the project's anticipated environmental impacts in each category.

Because the project fits into the definition of a "project" under Public Resources Code Section 21065 requiring discretionary approvals by the City, and because it could result in a significant effect on the environment, the project is subject to CEQA review. The IS Checklist was prepared to determine the appropriate environmental document to satisfy CEQA requirements: an Environmental Impact Report (EIR), an MND, or a Negative Declaration. The analysis in this IS Checklist supports the conclusion that the project would not result in significant environmental impacts.

This IS/MND will be circulated for 30 days for public and agency review, during which time individuals and agencies may submit comments on the adequacy of the environmental review. Following the public review period, the City Council will consider any comments received on the IS/MND when deciding whether to adopt the IS/MND.

2.0 Project Description

1. Project:

Parkview Townhomes Project (project)

2. Lead Agency:

City of Escondido
Development Services Department, Planning Division
201 North Broadway
Escondido, CA 92025

3. Contact Person and Phone Number:

Ivan Flores, AICP, Principal Planner
City of Escondido, Planning Division
760-839-4529
ivan.flores@escondido.gov

4. Project Location:

The project site is in the City of Escondido, California, north of West El Norte Parkway on assessor parcel number 226-380-48. The regional location of the project site is shown in Figure 1, the project location on a U.S. Geological Survey (USGS) Map is shown in Figure 2, and an aerial photograph of the project site is shown in Figure 3.

5. Surrounding Land Use(s) and Project Setting:

The 4.96-acre project site is partially developed with a single-family residence with several ancillary structures, a driveway, a separate private access road providing ingress/egress to West El Norte Parkway, underground and overhead utilities, a terraced area, several fenced areas, and two large open areas consisting of vacant land. The project site is located within Section 9, Township 12 South, Range 2 West of the San Bernardino Base and Meridian; USGS Valley Center, California Quadrangle (USGS 1998). Surrounding land uses are identified in Table 1.

Table 1
Surrounding Land Uses

Direction	Land Use Description	General Plan Designation	Zoning
North	City of Escondido Rod McLeod Park	Specific Plan Area (SPA) 13	Open Space/Parks (OS)
East	Commercial and residential	SPA 13	Professional Commercial (CP)
South	West El Norte Parkway followed by residential	Urban I (U1)	Mobilehome Residential (R-T)
West	Undeveloped lot owned by San Diego Gas & Electric, which supports a northeast trending utility corridor	SPA 13	Professional Commercial (CP)

6. Project Applicant/Sponsor:

Touchstone Communities
9815 Mira Mesa Boulevard
San Diego, CA 92131

7. General Plan Designation:

- Existing Land Use Designation: SPA 13 Imperial Oakes Corporate Center
- Proposed Land Use Designation: Urban IV

8. Zoning:

- Existing Zoning: Professional Commercial (CP)
- Proposed Zoning: High Multiple Residential (R-4)

9. Description of Project:

The project would demolish the existing single-family residence and ancillary structures and construct 70 townhomes and associated recreational areas including a tot-lot children's park, play lawn, seating area, and private community pool (Figure 4). The project would include seven buildings totaling 126,582 square feet and the townhomes would be broken into the following four plans:

- Plan 1 would consist of fifteen 1,110-square-foot townhomes consisting of two bedrooms and two and a half bathrooms.

- Plan 2 would consist of seventeen 1,186-square-foot townhomes consisting of two bedrooms and two and a half bathrooms.

- Plan 3 would consist of sixteen 1,380-square-foot townhomes consisting of three bedrooms and three and a half bathrooms.

- Plan 4 would consist of twenty-two 1,576-square-foot townhomes consisting of three bedrooms and three and a half bathrooms.

The townhomes would reach a maximum height of 35 feet and 9 inches. In addition, the project would include 51,496 square feet of open space (2,447 square feet for private patios, 1,810 square feet for private decks, 7,028 square feet for recreational areas, and 40,211 square feet for common areas).

Off-Site Improvements

The project includes a 0.06-acre off-site improvement area that includes constructing a new public sidewalk along the project frontage of West El Norte Parkway and providing a new driveway connection to West El Norte Parkway within the existing right-of-way. Additionally, the project includes off-site improvements to reduce significant impacts to Vehicle Miles Traveled (VMT). As detailed in Section 4.17.b of this document, and mitigation measure TRA-1, these improvements include installing high-visibility crosswalks at El Norte Parkway and Morning View Drive, North

Broadway and Lincoln Avenue, and West Lincoln Avenue and North Escondido Boulevard. These improvements also include providing a pedestrian connection from the project site to the Rod McLeod Park access road, eliminating the need for a circuitous route around the block and providing residents with a more direct and convenient path to the park. 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.

Discretionary Approvals

The discretionary approvals required for the project include a Tentative Subdivision Map/Condominium Permit, a Major Plot Plan, a Design Review Permit as required for Condominium Permits (Section 33-951 of Article 49), and a Grading Exemption. The project also proposes a General Plan Amendment (GPA) to amend the existing land use designation of SPA 13 Imperial Oakes Corporate Center to Urban IV and a Zone Map Amendment (ZMA) to amend the existing zoning from Professional Commercial (CP) to High Multiple Residential (R-4). In addition, the project would require an Administrative Adjustment to allow up to a 25 percent reduction to the rear setback requirement. Because the project site was not included in the City's adopted 2021-2029 6th Cycle Housing Element Update (City of Escondido 2021a) Regional Housing Needs Allocation, the City would not require the project to meet the 70 percent minimum density requirement for the High Multiple Residential (R-4) zone.

Parking and Site Access

The project would demolish the existing driveway connecting the existing residence to West El Norte Parkway and construct a new driveway connecting to West El Norte Parkway at the southeastern corner of the project site. Access to the project site would be restricted to right-in, left-in, and right-out movements via West El Norte Parkway. Internal driveways would be constructed to allow for vehicular access throughout. Pursuant to Section 33-765 in the City's Municipal Code, the project would require 150 parking spaces. The project would exceed this requirement by providing 165 parking spaces, which would consist of two garage parking spaces per each unit, resulting in 140 garage parking spaces, as well as 25 guest parking spaces, two of which would be Americans with Disabilities Act (ADA) accessible. The project would also provide direct pedestrian access via an ADA accessible path to West El Norte Parkway.

Grading

Project grading would consist of a 1.5:1 (Horizontal:Vertical) cut slope for the northern portion of the project site, and a 2:1 (Horizontal:Vertical) fill slope for the southern portion of the project site. A Grading Exemption would be required to allow for fill slopes within 50 feet of the property line to be up to 40 feet in height, cut slopes within 50 feet of the property line to be up to 22 feet in height, and a 1.5:1 cut slope along the northern portion of the project site. Grading would consist of 27,435 cubic yards (CY) of cut, 33,710 CY of fill, resulting in a net import of 6,275 CY of soil.

Landscaping and Signage

As shown in Figure 5, proposed landscaping would include a mixture of trees, shrubs, and groundcover for a total landscaped area of 89,257 square feet or 41.3 percent of the total 4.96-acre (216,057.6 square feet) project site. The project would include a concrete monument sign located at

the front entrance of the project site. Project signage will require a building permit, pursuant to Municipal Code Article 66.

Drainage

The existing topography of the project site is relatively steep and generally slopes from the north to the south. The project is designed to maintain the existing drainage patterns. The project would include drainage improvements, and construction of Best Management Practices (BMPs). Biofiltration basin (BMP 1) would be located on the southern portion of the project site and is proposed for water quality/hydromodification management and detention to maintain the existing condition peak flow rates. See Section 4.10 for additional details.

Water and Wastewater Treatment

Water services would be provided to the project site by the Rincon Del Diablo Water District, and the project would connect to the existing water line within West El Norte Parkway. Sewer services would be provided to the project site by the Wastewater and Water Reuse Division of the City's Utilities Department. The project would connect to the existing sewer line within West El Norte Parkway and include a sewer lateral connection to each townhome.

10. Other Required Agency Approvals or Permits Required:

None are required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Consistent with the requirements of Assembly Bill (AB) 52, on January 27, 2025, the City initiated consultation with the following Native American tribes who are traditionally and culturally affiliated with the geographic area of the project to consult regarding potential impacts to tribal cultural resources:

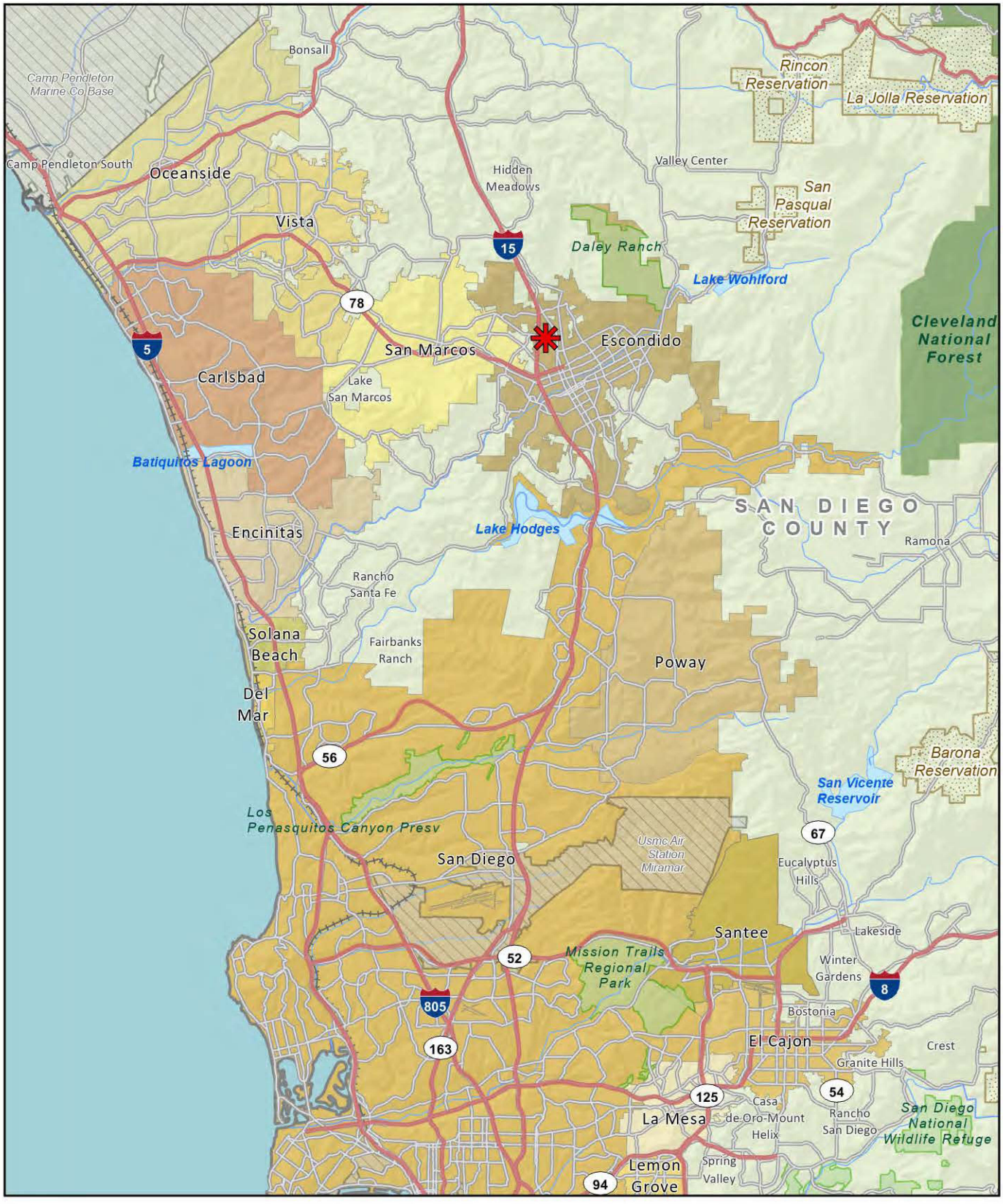
- San Pasqual Band of Mission Indians
- San Luis Rey Band of Mission Indians
- Rincon Band of Luiseño Indians
- Soboba Band of Luiseño Indians
- Mesa Grande Band of Mission Indians

To date, the City has conducted consultation with the Rincon Band of Luiseño Indians and the San Luis Rey Band of Mission Indians. As discussed in Section 4.18, the additional three tribes included in the City's consultation efforts either declined consultation or did not respond. As of the date of public review, consultation remains ongoing with the Rincon Band and the San Luis Rey Band.

12. Summary of Environmental Factors Potentially Affected:

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

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



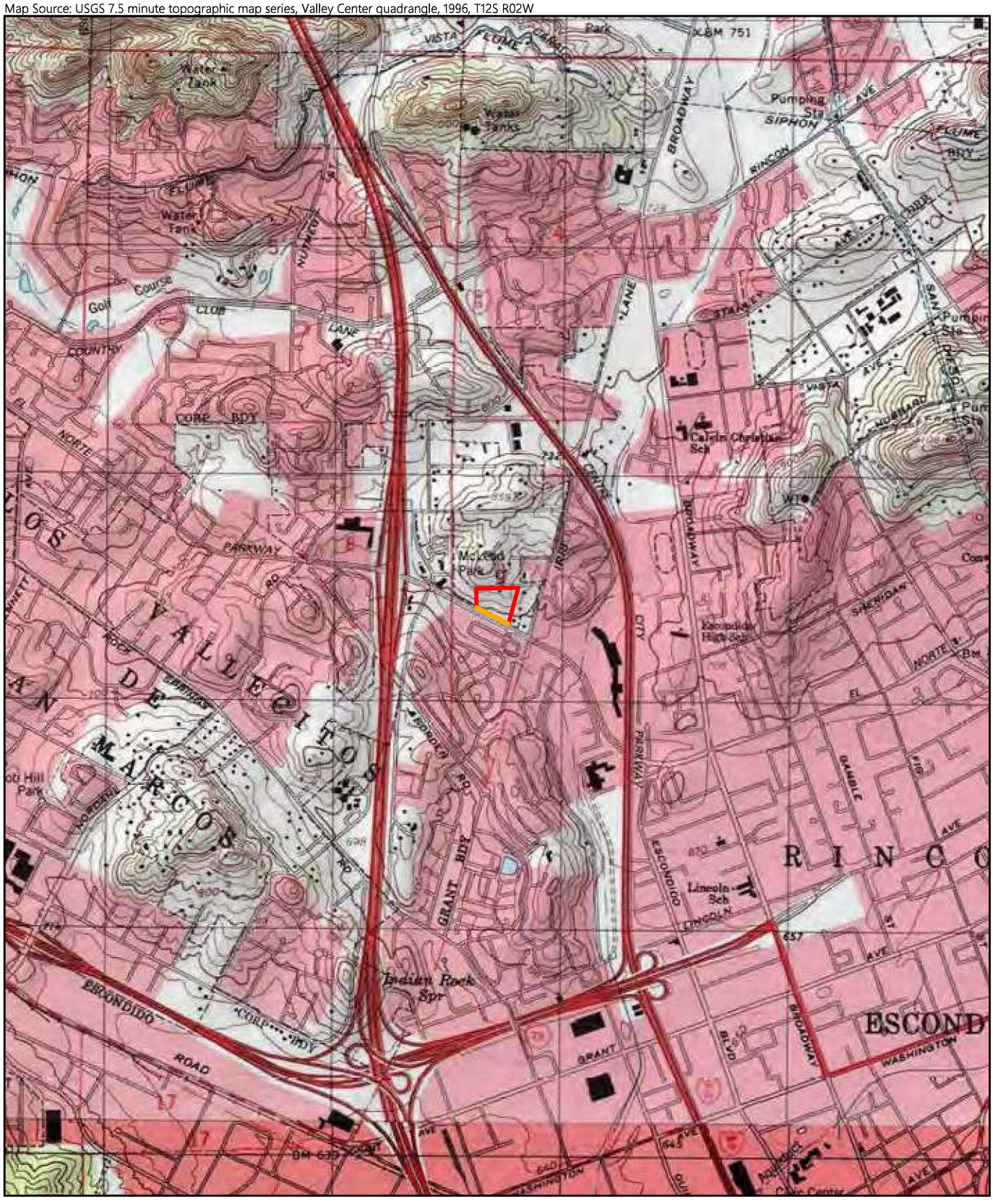
Project Location

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FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, Valley Center quadrangle, 1996, T12S R02W



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FIGURE 2
Project Location on USGS Map

Image Source: NearMap (flown April 2025)

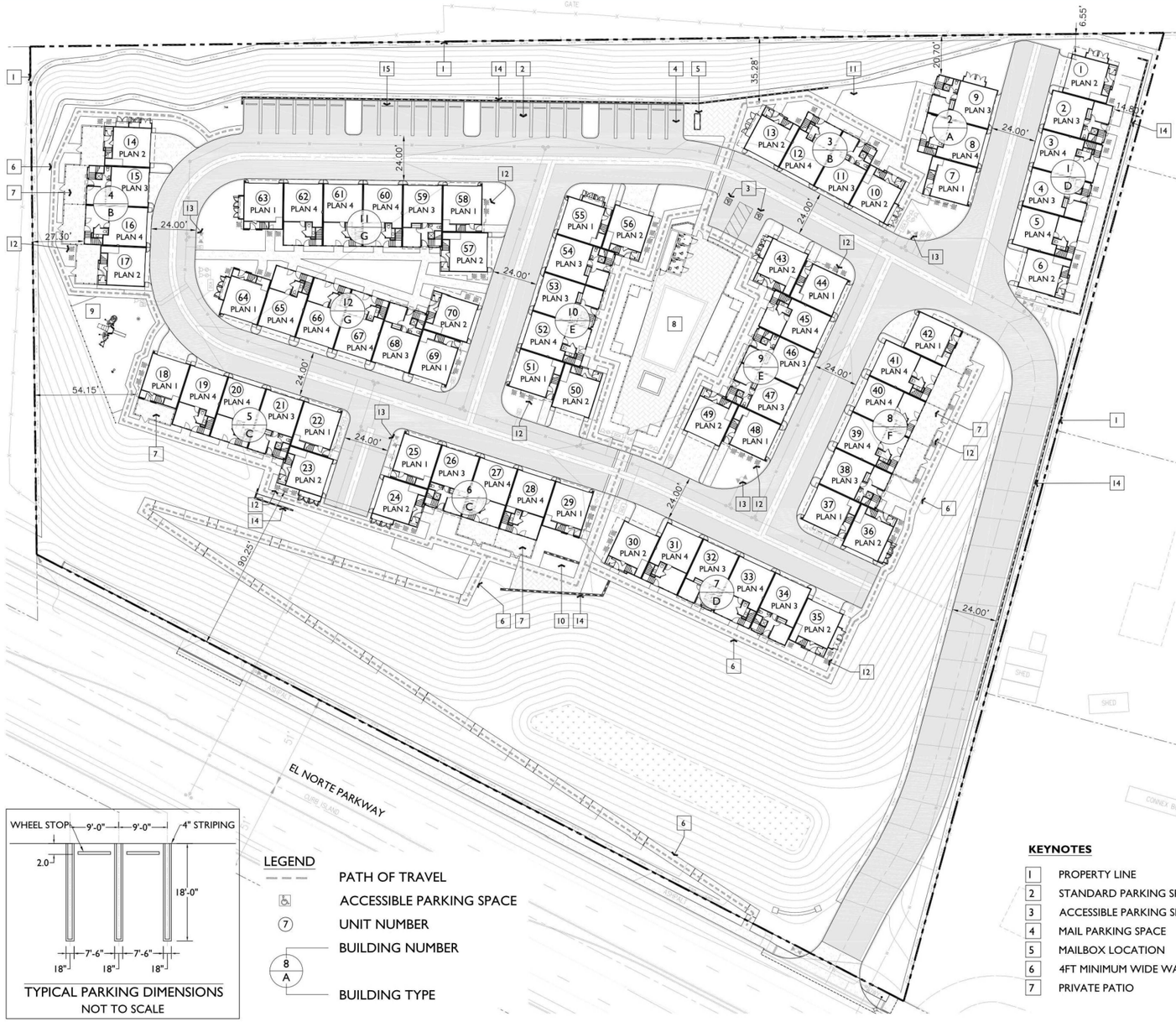


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FIGURE 3
Project Location on Aerial Photograph

Map Source: Touchstone Development



PROJECT SUMMARY
3-STORY TOWNHOMES

HOMES	70 UNITS
AREA	4.96 AC
DENSITY	14.1 DU/AC
PARKING	165 SP (2.35 SP/DU)
ADDRESS	550 W EL NORTE PARKWAY
APN	226-380-48
EXISTING LAND USE	SPA-13
PROPOSED LAND USE	URBAN IV
EXISTING ZONING	C-P (PROFESSIONAL COMMERCIAL)
PROPOSED ZONING	R-4-24
FAR	0.58
LOT COVERAGE	20%
ALLOWED HEIGHT	75 FT
PROPOSED HEIGHT	36 FT

UNIT SUMMARY

15	PLAN 1 2BD/2.5BA	1,110 SF
17	PLAN 2 2BD/2.5BA	1,186 SF
16	PLAN 3 3BD/3.5BA	1,380 SF
22	PLAN 4 3BD/2.5BA	1,576 SF
70 TOTAL UNITS		

PARKING SUMMARY

REQUIRED	
32 2BD X 1.75 SP =	56 SPACES
38 3BD X 2 SP =	76 SPACES
70 GUEST X .25 SP =	18 SPACES
TOTAL REQUIRED	150 SPACES

PROVIDED	
GARAGE	140 SPACES
OPEN GUEST	25 SPACES
TOTAL PROVIDED	165 SPACES

BUILDING SUMMARY

BUILDING A	5,483 SF X 1	5,483 SF
BUILDING B	7,218 SF X 2	14,436 SF
BUILDING C	10,765 SF X 2	21,530 SF
BUILDING D	11,114 SF X 2	22,228 SF
BUILDING E	12,254 SF X 2	24,508 SF
BUILDING F	12,799 SF X 1	12,799 SF
BUILDING G	12,799 SF X 2	25,598 SF
TOTAL		126,582 SF

OPEN SPACE SUMMARY

REQUIRED	
32 2BD X 400 SF =	12,800 SF
38 3BD X 600 SF =	22,800 SF
TOTAL REQUIRED	35,600 SF

PROVIDED	
PRIVATE PATIOS	2,447 SF
PRIVATE DECKS	
17 PLAN 2 X 50 SF	850 SF
16 PLAN 3 X 60 SF	960 SF
RECREATIONAL AREAS	7,028 SF
COMMON OPEN SPACE	40,211 SF
TOTAL PROVIDED	51,496 SF

KEYNOTES

1. PROPERTY LINE
2. STANDARD PARKING SPACE (9' X 18')
3. ACCESSIBLE PARKING SPACE (9' X 18')
4. MAIL PARKING SPACE
5. MAILBOX LOCATION
6. 4FT MINIMUM WIDE WALKWAY
7. PRIVATE PATIO
8. REC AREA - POOL/SPA
9. REC AREA - TOT LOT
10. REC AREA - SEATING AREA
11. REC AREA - PLAY LAWN
12. AC UNIT
13. FIRE HYDRANT
14. RETAINING WALL
15. WHEEL STOP

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FIGURE 4
Site Plan

Map Source: Touchstone Development



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FIGURE 5
Landscape Plan

3.0 Environmental Determination

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Ivan Flores
Signature

October 06, 2025
Date

Ivan Flores
Printed Name

Principal Planner
Title

4.0 Initial Study Checklist

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

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

    a. Earlier Analysis Used. Identify and state where they are available for review.

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

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

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

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and

    b. the mitigation measure identified, if any, to reduce the impact to less than significance.

4.1 Aesthetics

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

EXPLANATIONS:

a. No Impact

A scenic vista is generally defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed. Scenic vistas may also be represented by a particular distant view that provides visual relief from less attractive views of nearby features. Local open space or recreational areas may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape of nearby features.

According to the City's General Plan EIR (City of Escondido 2012a), the City does not designate scenic vistas within its boundaries. Therefore, the project would not have a substantial adverse effect on a scenic vista. No impact would occur.

b. Less than Significant Impact

According to the City's General Plan Update EIR (City of Escondido 2012a) and California Department of Transportation (Caltrans) State Scenic Highway System Map (Caltrans 2024), there are no officially designated or eligible state scenic highways in the City. As described in Section 4.5.a below, there are no historic buildings located on the project site. Trees on the project site are limited to ornamental vegetation. Although the project site contains rock outcroppings, the nearest officially designated state scenic highway is a segment of State Route 52, approximately 20 miles south of the project site. The nearest eligible state scenic highways are Interstate 5, approximately 12.5 miles west of the project site; State Route 76, approximately 13.2 miles northwest of the project site; and a segment of Interstate 15 (I-15), approximately 13.2 miles northwest of the project site. Views of the project site are not readily afforded from State Route 52, Interstate 5, State Route 76, or I-15 due to distance, topographic conditions, and intervening vegetation and structures. Therefore, the project would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant.

c. Less than Significant Impact

The project site is in an urbanized area, as defined by CEQA Guidelines Section 15387. The project site is bounded by commercial and residential uses to the east, West El Norte Parkway followed by residential to the south, the City's Rod McLeod Park to the north, and vacant land owned by San Diego Gas & Electric (SDG&E) to the west. Thus, for the purposes of this threshold, the following analysis evaluates the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

The project would require a GPA to reassign the land use designation from SPA 13 Imperial Oakes Corporate Center to Urban IV and a ZMA to reassign the zoning designation from Professional Commercial (CP) to High Multiple Residential (R-4) to allow the construction of 70 townhomes and associated amenities. The townhomes are designed to be consistent with the development standards and design standards for the High Multiple Residential (R-4) zone. Therefore, development of the project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

d. Less than Significant Impact

A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on daytime or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings whose exterior façades largely or entirely comprise highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

Project Construction

Pursuant to Municipal Code Section 17-234, Construction Equipment, no construction activities would occur before 7:00 a.m. or after 6:00 p.m., Monday through Friday, and before 7:00 a.m. or after 5:00 p.m. on Saturday. Construction would be prohibited on Sunday and on days designated by the President of the United States, Governor of California, or Escondido City Council as public holidays. Thus, as no construction activities would be permitted after 6:00 p.m., Monday through Friday, and after 5:00 p.m. on Saturday, short-term construction related impacts to nighttime lighting would not occur. Furthermore, project construction could involve temporary daytime glare impacts as a result of construction equipment and materials. However, based on the project's limited scope of activities, these sources of glare would not be substantial and would be similar in character to existing daytime glare in the area (such as automobiles). Therefore, project construction would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

Project Operation

The project would be required to comply with Municipal Code Article 35, Outdoor Lighting, regulations to minimize light pollution. Specifically, the project would be required to ensure all outdoor light fixtures meet the minimum criteria contained in Municipal Code Section 33-711 through 33-714, including that lighting would be screened/angled to minimize light spill-over onto adjacent properties. Therefore, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

4.2 Agriculture and Forestry Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

EXPLANATIONS:

a. No Impact

The California Department of Conservation (DOC) California Important Farmland Finder classifies the project site as a mix of "urban and built up land" or "other land" (California DOC 2024). Additionally, based on the City's General Plan Update EIR (City of Escondido 2012a), no agricultural areas are present in the project area. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

b. No Impact

The project would require a zone change from Professional Commercial (CP) to High Multiple Residential (R-4). The existing Professional Commercial (CP) zone does not permit agricultural uses. According to the California DOC, California Williamson Act Enrollment Finder (California DOC 2024), the project site is not subject to a Williamson Act contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c. No Impact

The City does not have any zoning classifications for forestland, timberland, or timberland production zones. The project site does not contain any forest or timberland as defined by Public Resources Code Section 12220[g], Public Resources Code Section 4526, or Government Code Section 51104(g) and is not zoned as forest or timberland. No impact would occur.

d. No Impact

The project site does not contain any forest lands or timberland as defined by Public Resources Code Section 12220[g], Public Resources Code Section 4526, or Government Code Section 51104(g). No impact would occur.

e. No Impact

The project site does not support any agricultural or forest land. Therefore, the project would not involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

4.3 Air Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Air Quality Analysis prepared by RECON Environmental, Inc. (RECON; Appendix A).

a. Less than Significant Impact

Project consistency is based on whether the project would conflict with or obstruct implementation of the Regional Air Quality Standards (RAQS) and/or applicable portions of the State Implementation Plan, which would lead to increases in the frequency or severity of existing air quality violations.

The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_X), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, maintaining and improving air quality. The most recent 2022 RAQS and Transportation Control Measures were adopted in 2023 (SDAPCD 2022).

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the General Plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project proposes a GPA to amend the existing land use designation of SPA 13 Imperial Oakes Corporate Center to Urban IV and a ZMA to amend the existing zoning from Professional Commercial (CP) to High Multiple Residential (R-4). The project would therefore not be consistent with the existing land use designation used in the development of the region's growth projections. However, the project would result in less operational emissions than one that would be consistent with the existing land use designation. As stated in the Transportation Local Mobility Analysis (LMA), the project would generate 560 daily trips (Appendix B). A Transportation Analysis Due Diligence memorandum (memo) was also prepared for the project (Appendix C). The memo calculated trips associated with three alternatives that are consistent with the existing land use designation:

- Alternative 1 – General Office
- Alternative 2 – Industrial
- Alternative 3 – 80 percent General Office and 20 percent Industrial

The memo calculated project sizes for a 1.0 floor area ratio (FAR; 212,000 square feet) and 2.0 FAR (424,000 square feet) and used trip generation rates provided by both the Institute of Transportation Engineers (ITE) and SANDAG. Based on the trip generation calculations, it was found that the fewest trips would be generated by a 212,000-square-foot industrial project that generates 1,032 daily trips based on ITE trip rates. All other alternatives would generate more traffic and therefore result in greater emissions. Criteria pollutant emissions associated with this alternative were calculated and compared to operational emissions associated with the project. The results are summarized in Table 2. California Emissions Estimator Model (CalEEMod) output for the industrial project is provided in Attachment 2 of Appendix A.

Table 2
Comparison Project and Industrial Project Operational Emissions
(pounds per day)

	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Operational Emissions						
Mobile Sources	2	2	15	<1	3	1
Area Sources	3	<1	4	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Total	**6**	**2**	**20**	**<1**	**4**	**1**
Industrial Project Operational Emissions						
Mobile Sources	4	3	28	<1	6	2
Area Sources	6	<1	9	<1	<1	<1
Energy Sources	<1	2	2	<1	<1	<1
Total	**10**	**5**	**39**	**<1**	**7**	**2**

ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns

As shown in Table 2, the project would result in less emissions than one that is consistent with the existing land use designation. Therefore, the project would generate fewer emissions than what is accounted for in the RAQS and would not exceed the growth assumptions used in the RAQS. Therefore, the project would not exceed the growth forecasting used to develop the RAQS, and impacts would be less than significant.

Another factor used to determine if a project would conflict with the implementation of the RAQS is determining if the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards (NAAQS and CAAQS) or interim emissions reductions specified in the RAQS. As shown in Table 3, project emissions would not exceed the applicable significance thresholds for any criteria pollutants. Therefore, the project would not obstruct or conflict with implementation of the RAQS, and impacts would be less than significant.

Table 3 Summary of Project Operational Emissions (pounds per day)						
	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources	2	2	15	<1	3	1
Area Sources	3	<1	4	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Total	**6**	**2**	**20**	**<1**	**4**	**1**
Significance Threshold	*55*	*250*	*550*	*250*	*100*	*55*
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns						

b. Less than Significant Impact

The region is classified as an attainment area for all criterion pollutants except ozone, particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$). The SDAB is a non-attainment area for the 8-hour federal and state ozone standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_X and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. $PM_{2.5}$ includes fine particles that are found in smoke and haze and are emitted from all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM_{10} includes both fine and coarse dust particles; sources include crushing or grinding operations, as well as dust from paved or unpaved roads.

As shown in Table 4, project construction would not exceed the applicable significance thresholds, which are designed to provide limits below which project emissions would not significantly change regional air quality. Additionally, the project would implement standard construction measures compliant with mandatory SDAPCD rules and regulations and the California Air Resources Board's (CARB's) In-Use Off-Road Diesel-Fueled Fleets Regulation, which would further reduce construction emissions. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

Table 4 Summary of Worst-Case Construction Emissions (pounds per day)						
	Pollutant					
Construction	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	2	21	20	<1	1	1
Site Preparation	3	29	30	<1	9	5
Grading	2	20	20	<1	5	2
Building Construction	1	10	15	<1	1	<1
Paving	1	6	9	<1	<1	<1
Architectural Coatings	26	1	1	<1	<1	<1
Maximum Daily Emissions	**26**	**29**	**30**	**<1**	**9**	**5**
Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns						

Long-term emissions of regional air pollutants occur from operational sources. As shown in Table 3 above, the project's daily operational emissions would not exceed the applicable regional emissions thresholds for any pollutant. These thresholds align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Consequently, project operation would not impact any sensitive populations. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

c. Less than Significant Impact

Sensitive land uses include schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities. The nearest sensitive receptors include residential uses adjacent to as close as 50 feet from the eastern project boundary, and 115 feet from the southern project boundary.

Carbon Monoxide Hot Spots

Localized carbon monoxide (CO) concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal CAA. This means that SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Bay Area Air Quality Management District (BAAQMD) developed a screening threshold in their 2022 CEQA Guidelines (BAAQMD 2022). These screening criteria are considered applicable in the SDAB because the San Francisco Bay Air Basin and the SDAB have the same CO maintenance designations. If the following screening criteria are met, operation of a project would result in less than significant impacts related to CO:

- The project would be consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the RTP, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 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).

As stated in the Transportation LMA (see Appendix B), traffic volumes at affected intersections would be significantly less than both the 44,000 vehicles per hour and 24,000 vehicles per hour screening

levels identified above. Furthermore, these intersections are projected to operate at a level of service (LOS) A, B, or C, which are considered acceptable. Therefore, the project's traffic contribution of 560 trips per day would not generate a CO hot spot that could expose sensitive receptors to substantial pollutant concentration, and impacts would be less than significant.

Diesel Particulate Matter – Construction

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

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction is anticipated to last for approximately two years. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were two years, the exposure would be seven percent of the total 30-year exposure period used for health risk calculation. Furthermore, construction activities would be subject to several control measures per the requirements of SDAPCD rules and regulations and CARB Airborne Toxic Control Measures. Due to the short-term construction duration and the limited construction emissions, there is very low potential for fugitive dust or DPM to impact sensitive receptors during construction. The total project construction DPM emissions are not of a magnitude and duration that could create significant air toxics risks to the nearest receptors during construction. Compliance with the SDAPCD rules and regulations would reduce the fugitive dust emissions during project construction and associated impacts to sensitive receptors. Thus, the project's construction emissions would not have the potential to significantly impact the nearby residents. Therefore, the project would not expose sensitive receptors to substantial levels of toxic air contaminants during construction, and impacts would be less than significant.

Diesel Particulate Matter – Operation

As discussed in Appendix A, the CARB handbook indicates that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible. The project site is located 1,000 feet or more from I-15. The traffic volumes on roadways within 500 feet of the project site are projected to be well less than 100,000 vehicles per day (see Appendix B). Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with DPM during operation, and impacts would be less than significant.

d. Less than Significant Impact

The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses; however, exposure to odors associated with project construction would be short term and temporary in nature (two years) and would disperse quickly with distance from the project site. Therefore, project construction would not generate other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

The following list provides some common types of facilities that are known producers of objectionable odors (BAAQMD 2022). This list of facilities is not meant to be all-inclusive.

- Wastewater Treatment Plant
- Wastewater Pumping Facilities
- Sanitary Landfill
- Transfer Station
- Composting Facility
- Petroleum Refinery
- Asphalt Batch Plant
- Chemical Manufacturing
- Fiberglass Manufacturing
- Painting/Coating Operations
- Rendering Plant
- Coffee Roaster
- Food Processing Facility
- Confined Animal Facility/Feed Lot/Dairy
- Green Waste and Recycling Operations
- Metal Smelting Plants

The project does not include any of these uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. Therefore, project operation would not generate other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

4.4 Biological Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and 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 tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

EXPLANATIONS:

The following section is based on the Biological Resources Letter Report prepared by Merkel & Associates, Inc. (M&A; Appendix D). The biological study area consists of the project site plus a 100-foot mapping buffer around the project site. M&A conducted a general biological investigation within the biological study area on June 7, 2024. A follow-up field inspection, focused on the west side of the biological study area was conducted on August 22, 2024.

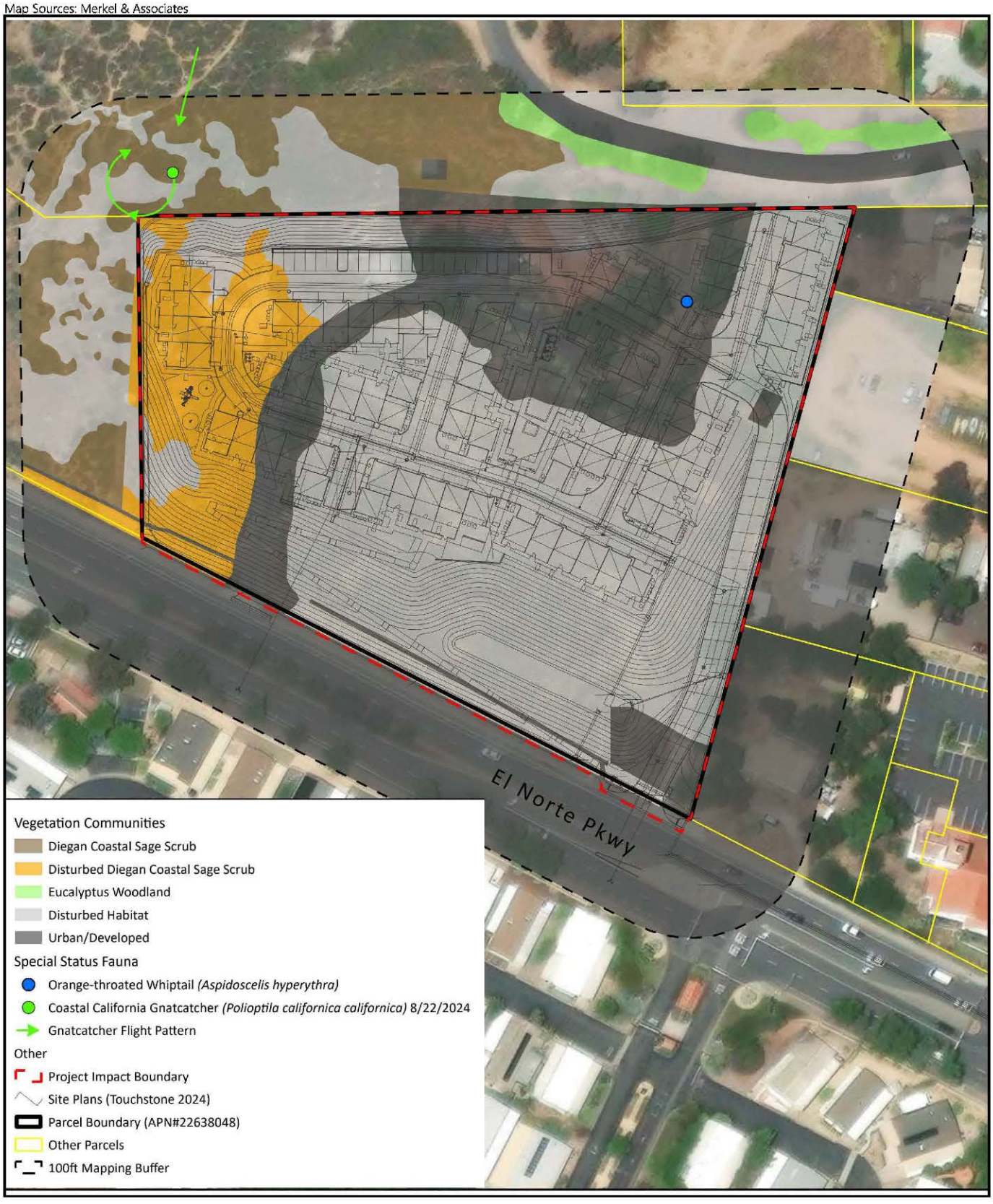
a. Potentially Significant Unless Mitigation Incorporated

Vegetation Communities

Figure 6 presents the distribution of vegetation communities/land cover types that were identified within the project site and 100-foot mapping buffer during the biological survey. Three vegetation communities/land cover types were identified within the project site: urban/developed, disturbed habitat, and disturbed Diegan coastal sage scrub. Urban/developed was mapped for the existing residential structures, driveway, and ornamental landscape, while disturbed habitat was mapped for most of the project site, primarily located on the east side of the driveway. During the initial biological investigation, this portion of the property was dominated by weedy, non-native plants including short-pod mustard (*Hirschfeldia incana*) and tocalote (*Centaurea melitensis*). Disturbed Diegan coastal sage scrub was mapped for a portion of the property on the west side of the driveway. This area is dominated by the native shrub California encelia (*Encelia californica*), which provides approximately 45 percent cover. Non-native forbs comprise most of the remaining cover between shrubs. These undeveloped portions of the property are subject to frequent vegetation clearing via mowing, weed whip, or similar means. Five vegetation communities/land cover types have been mapped within the 100-foot buffer around the project site: urban/developed, disturbed habitat, eucalyptus woodland, Diegan coastal sage scrub, and disturbed Diegan coastal sage scrub.

As shown in Table 5, the project would result in direct, permanent impacts to the entire 4.96-acre property. Additionally, the project would impact the 0.06-acre off-site improvement area that includes constructing a new public sidewalk along the project frontage of West El Norte Parkway and providing a new driveway connection to West El Norte Parkway within the existing right-of-way. Overall, the project would impact 1.38 acres of urban developed land, 3.06 acres of disturbed habitat, and 0.58 acres of disturbed Diegan coastal sage scrub. Impacts to 0.58 acres of disturbed Diegan coastal sage scrub would be considered significant and would require habitat-based mitigation. Mitigation measure BIO-1 would require purchase of available sage scrub credits from an approved mitigation bank within the local north San Diego County region. Implementation of mitigation measure BIO-1 would reduce impacts to disturbed Diegan coastal sage scrub to a less than significant level.

Map Sources: Merkel & Associates



RECON

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FIGURE 6
Impacts to Biological Resources

Table 5 Impacts to Vegetation Communities						
Vegetation Community	Habitat Type	Impact Acreage			Mitigation Ratio	Required Mitigation Acreage
		On-site	Off-site	Total		
Urban/Developed	Upland, Regionally Not Sensitive	1.34	0.04	1.38	None	0.00
Disturbed Habitat	Upland, Regionally Not Sensitive	3.04	0.02	3.06	None	0.00
Disturbed Diegan Coastal Sage Scrub	Upland, Regionally Sensitive	0.58	<0.01	0.58	1:1	0.58
	Total	**4.96**	**0.06**	**5.02**		**0.58**

Special Status Species

Figure 6 presents the locations of special status species that were identified within the project site and 100-foot mapping buffer during the biological survey. An individual orange-throated whiptail (*Aspidoscelis hyperythra*) was observed on-site, within the urban landscape of the property. Orange-throated whiptail is designated as a Watch List species by the California Department of Fish and Wildlife and a Special Animal by the California Natural Diversity Database. This species typically occurs as a resident of sage scrub and chaparral communities throughout the region and is expected to occur within the biological study area and further north within Rod McLeod Park where sage scrub is present. Due to the relatively small amount of sage scrub impacted by the project and its low-quality value because of the frequent mowing, the project site is not expected to support a high number of individuals. As a result, direct impacts to orange-throated whiptail would not be expected to have a substantial adverse effect on the local long-term survival of these species; thus, impacts would be less than significant.

Two coastal California gnatcatchers (*Polioptila californica californica*) were incidentally detected during the follow-up biological investigation on August 22, 2024, within the 100-foot mapping buffer but not detected within the project site. There is no suitable habitat for coastal California gnatcatchers to nest on-site. Most of the sage scrub immediately north of the parcel, within the southern edge of Rod McLeod Park, is expected to serve as low quality nesting habitat for coastal California gnatcatcher due to the periodic maintenance of vegetation. This maintenance has likely created the current condition, where the area is dominated by California encelia and deerweed (*Acmispon glaber* var. *glaber*) rather than the species-preferred plant composition, which includes (but is not limited to) California sagebrush (*Artemisia californica*) and flat-top buckwheat (*Eriogonum fasciculatum* var. *fasciculatum*). While the sage scrub immediately west of the project site within the SDG&E lot supports the species-preferred plant composition, the habitat is highly fragmented with large patches of non-native vegetation mapped as disturbed habitat. Based on the literature and data review, as well as the biological surveys conducted in June and August 2024, it is presumed the coastal California gnatcatchers detected within the 100-foot mapping buffer were in transit and/or wandering from higher quality habitat, likely located north of the biological study area within the central portion of Rod McLeod Park (within 500 feet of the project site) or potentially further north in sage scrub habitat off Imperial Drive and Centre City Parkway located approximately 0.47 miles north of the project site.

Because of the 2024 incidental observation, M&A qualified biologists conducted seven protocol surveys between June and July 2025 to determine the presence or absence of coastal California gnatcatcher within the biological study area. The surveys were conducted in accordance with the current USFWS *Coastal California Gnatcatcher Presence/Absence Survey Protocol* (USFWS 1997) and the *Guidance on Extending the Current USFWS California Gnatcatcher Protocol to Cover Survey Periods That Include Both Breeding and Non-Breeding Periods* (USFWS 2008), as authorized under M&A's federal Endangered Species Act, Section 10(a)(1)(A) permit number 797999-9 and CDFW Memorandum of Understanding. No gnatcatchers were detected within the biological study area or adjacent habitat during the protocol surveys. Based on the low quality of habitat on-site and 2025 negative protocol survey results, it is presumed that the gnatcatchers incidentally detected within the 100-foot mapping buffer in August 2024 were in transit. Therefore, implementation of the project would not result in direct impacts to habitat occupied by coastal California gnatcatcher and impacts would be less than significant.

The American bumble bee (*Bombus pensylvanicus*), a Special Animal designated by the California Natural Diversity Database, and Crotch's bumble bee (*Bombus crotchii*), a California Endangered Species Act candidate for state listing as endangered, may forage within the proposed impact area of approximately 0.58 acres of disturbed Diegan coastal sage scrub, and were determined to have a moderate potential to occur within the project site. As a result, focused surveys for Crotch's bumble bee, were conducted by M&A on June 5, June 19, and July 3, 2025, in accordance with CDFW's *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. No Crotch's bumble bee, Crotch's bumble bee nests, American bumble bee, or American bumble bee nests were detected during the focused surveys within the biological study area. Based on the low quality of habitat on-site and 2025 focused survey results, these species are presumed to be absent from the project site. As a result, implementation of the project would not result in direct impacts to habitat occupied by American bumble bee and Crotch's bumble bee; thus, impacts would be less than significant.

Nesting birds, including the house finch (*Haemorhous mexicanus*) and hooded oriole (Icterus cucullatus), were detected within the project site during the biological investigation; there is a possibility that they may be present within the project site during construction. Impacts to active migratory bird nests, if present at the time of construction, are prohibited under the federal Migratory Bird Treaty Act and California Fish and Game Code §3503 and §3513. Potential impacts to active migratory bird nests would be avoided with implementation of site-specific design measures that would be conditions of project approval and would ensure compliance with federal, state, and local rules and regulations. Implementation of the project's site-specific design measures would reduce potential impacts to nesting birds to a less than significant level.

Indirect Impacts

As previously discussed, focused surveys for Crotch's bumble bee and the American bumble bee were negative. Based on the negative survey results, these species are presumed absent from the biological study area and thus no indirect impacts are anticipated. Similarly, protocol surveys were negative for coastal California gnatcatcher. Based on the negative protocol survey results, coastal California gnatcatcher is presumed absent from the biological study area; it is also presumed absent from approximately 300 feet from the project site, and no indirect impacts are anticipated.

Implementation of the project would have the potential to result in indirect impacts to vegetation communities adjacent to the project site, most notably from the effects of disturbance/clearing of vegetation within the project footprint. Fugitive dust created from clearing/grubbing of the project site could negatively impact adjacent native habitat. In addition, exposed soils from clearing and grubbing may result in erosion and subsequent off-site sedimentation within native habitat. The introduction of invasive ornamental plants in the new landscape may have a detrimental effect on adjacent native habitats. The project would incorporate the following site-specific design measures that would be conditions of project approval and included as notes on the construction plan set:

1. Construction-period and permanent BMPs and water quality requirements would be designed and implemented in accordance with applicable state and local rules and regulations. This includes temporary placement of silt fence or similar perimeter control at the property boundary to prevent any loss of sand, silt, or material from the project site during construction activities.

2. All construction activities would occur during normal daylight hours in accordance with the City's local rules and regulations.

3. A project biologist would be retained to inspect and oversee installation of temporary perimeter fencing, be on-site during the initial clearing and grubbing of habitat, and conduct regular inspections thereafter during grading operations to ensure compliance with the project biological requirements. The biologist should be knowledgeable of upland biology and ecology, possess a bachelor's degree in a biological related field, and have at least two years of experience in field biology or current certification of a nationally recognized biological society. In lieu of the above qualifications, a resume would demonstrate to the satisfaction of the City that the proposed biologist has the appropriate training and background to effectively implement the biological-related site design measures. The biologist would have the authority to halt construction activities, if needed, and would report any detection of federally or state listed species and/or violation to the City and applicable resources agencies, if needed within 48 hours of detection.

4. Environmental training would be provided for contractors and construction personnel by the project biologist prior to the start of construction work and annually thereafter. The training would be repeated if gaps in construction operations were required.

5. Initial clearing, grubbing, and/or grading of vegetation would avoid the typical avian nesting season, which extends from February 1 to August 31. If this were not feasible, clearing, grubbing, and/or grading of vegetation may occur during the avian nesting season if the project biologist conducts a focused survey for active nests within approximately 72 hours prior to work in the area and determines the area to be free of nesting birds. If active bird nests were found, then all construction activities undertaken for the project must comply with regulatory requirements of the federal Migratory Bird Treaty Act and California Fish and Game Code §3503 and §3513. This would require protection of the nest, eggs, chicks, and adults until such time as the nestlings have fully fledged and are no longer dependent upon the nest site. The project biologist may need to conduct follow-up nesting bird surveys (e.g., weekly), as needed during the nesting season if suitable habitat is present on-site.

6. All necessary fuel modification requirements would be accommodated on-site.

7. All temporary and permanent landscaping would avoid the use of plant species listed by the California Invasive Plant Council on the California Invasive Plant Inventory.

8. All temporary and permanent lighting would be shielded and directed down onto the project site; it would not be broadcast into the adjacent properties.

Implementation of these site-specific design measures would reduce potential indirect impacts to a level less than significant.

b. Potentially Significant Unless Mitigation Incorporated

As discussed under Section 4.4.a above, the project would result in direct impacts to disturbed Diegan coastal sage scrub. Impacts to disturbed Diegan coastal sage scrub are significant under CEQA. Mitigation measure BIO-1 would require purchase of available sage scrub credits from an approved mitigation bank within the local north San Diego County region. Implementation of mitigation measure BIO-1 would reduce direct impacts to disturbed Diegan coastal sage scrub to a less than significant level. Furthermore, as discussed under Section 4.4.a above, implementation of site-specific design measures that would be conditions of project approval and included as notes on the construction plan set would reduce potential indirect impacts to sensitive habitat to a level less than significant.

c. No Impact

The project site is not located within a designated floodplain or floodway, nor are there any National Wetland Inventory or USGS drainages identified on-site. There are no aquatic resources within the biological study area that would be regulated under Sections 404 or 401 of the Clean Water Act, Porter-Cologne Water Quality Control Act, and/or California Fish and Game Code Streambed Alteration Agreement Section 1600-1616. Therefore, the project would not result in impacts to any jurisdictional wetlands or waterways. No impact would occur.

d. Less than Significant Impact

The biological study area is surrounded by development on three sides including West El Norte Parkway which is a relatively busy road. While undeveloped native Diegan coastal sage scrub abuts the property to the west and north, the undeveloped lands are isolated from larger tracks of contiguous habitat and portions of the abutting lands appear to be maintained with some level of vegetation management (e.g., removal). As a result, the project site's location within the urban setting does not support typical features that can be identified as a wildlife corridor. Furthermore, the project site does support any wildlife nursery sites. Therefore, the project would not result in impacts to wildlife movement or nursery sites, and impacts would be less than significant.

e. Potentially Significant Unless Mitigation Incorporated

The Biological Resources Report prepared for the project (see Appendix D) did not identify any mature trees that would require preservation on the project site. Furthermore, the project would be

required to adhere to Municipal Code Section 33-1068.B, which requires a vegetation removal permit prior to clearing, pruning, or destroying vegetation, and prior to any encroachments by new construction or improvements that disturb the root system within the dripline of mature trees. Overall, implementation of site-specific design measures identified under Section 4.4.a that would be conditions of project approval, along with regulatory compliance, and implementation of mitigation measure BIO-1 would reduce potential impacts regarding conflicts with local policies or ordinances protecting biological resources to a less than significant level.

f. Potentially Significant Unless Mitigation Incorporated

While the City is no longer an active participant in the Natural Community Conservation Planning (NCCP) program under the Multiple Habitat Conservation Plan, it continues to pursue the goals of the NCCP program, including habitat and species conservation and mitigation. Implementation of mitigation measure BIO-1 and the site-specific design measures identified under Section 4.4.a would reduce potential impacts regarding the NCCP program to a less than significant level.

Mitigation Measures

BIO-1: Prior to issuance of a grading permit, the City shall document that required project habitat mitigation has been secured by the Applicant from an approved mitigation bank, preferably within the north San Diego County region. Mitigation for significant direct impacts to approximately 0.58 acres of disturbed Diegan coastal sage scrub are proposed to be mitigated at a 1:1 ratio via the purchase of 0.58 acres of coastal sage scrub habitat from an approved mitigation bank.

4.5 Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Architectural and Historic Evaluation prepared by Recuerdos Research (Appendix E), the Archaeological Survey Report prepared by RECON (Appendix F), and the Archaeological Excavation Report prepared by RECON (Appendix G).

a. Less than Significant Impact

As discussed in the Architectural and Historic Evaluation (see Appendix E), a self-search of the archaeological and historical records maintained by the South Coast Information Center (SCIC) at San Diego State University was conducted on June 24, 2024, by Richard L. Carrico of Recuerdos Research. The focus of the records search was on historic buildings and structures. The records search only identified one historic resource within the one-half-mile research area. P-37-018745 is a circa 1930s single-story residence located at 225 West El Norte Parkway, approximately 2,000 feet southeast of the project site. No other recorded historical resources were found within the one-half-mile radius of the project site.

The project would demolish the existing single-family residence and ancillary structures. As discussed in the Architectural and Historic Evaluation (see Appendix E), the existing single-family residence and ancillary structures are over 45 years old. Specifically, the single-family residence is 71 years old, and the ancillary structures are over 45 years old. The master property record for the project site indicated that the 1,140-square-foot single-family residence was constructed in 1953 with three bedrooms and two bathrooms. Owners Robert C. and Ruby Brown were joint tenants. Mr. Brown was a roofing contractor who may have built the residence on speculation to sell. In November of that year, the parcel and residence were sold to Cecil B. and Lola Mays as joint tenants. In 1960, the Mays sold the parcel and residence to Anna Swanson, who was listed as a married woman. It appears that Ms. Swanson did not reside in the residence but probably rented it out. Ms. Swanson held the property for a little over a year before selling to Margaret W. Hearn, who was listed as a single woman and possibly a real estate or escrow agent in August 1961. In December 1961, Arthur and Catherine Willis purchased the parcel and the residence. Until recently, the Willis family and the Willis Trust continued to own the property.

Mr. Willis was a well-known resident in the Escondido area, although not a significant civic leader or historical figure. In the early 1950s, prior to purchasing the property, he lived first on Frant Street and then on Sunset Boulevard. In the 1950 federal census he is listed as a hod carrier and building contractor. In April 1953, Mr. Willis purchased a malt shop in San Marcos. By at least 1961, when he purchased the property, Mr. Willis became a San Diego County deputy sheriff and lived with his wife Catherine on the property. In the 1980s, Mr. Willis ran a cattle operation; although for the most part, he kept the cattle elsewhere. Over the decades, "Bob" Willis and his wife Catherine made improvements to the property, including constructing the ancillary structures and landscaping the property using natural stone and concrete. According to the residential building record the home was expanded in the late 1960s through the addition of a dwelling unit on the west side.

The existing single-family residence is constructed with a combination of cinder block and brick with zephyr shingle siding. The gabled roof is covered with clay tiles with a prominent brick chimney. It is of a common vernacular style for modest residences built in the 1940-1960 era. As modest vernacular commercial structures, the buildings do not possess unique or outstanding architectural

characteristics. Over the decades the residence has been substantially altered and remodeled, including through the addition of a dwelling unit separated by a carport and changing the basic footprint from a 'U' shape to a '7' shape. The original front of the residence and its entryway have been enclosed and there is now an enclosed porch/room. In many cases, the original metal sash and casement windows have been replaced, and a large non-original picture window was added to the home.

The single-family residence reflects the type and style of vernacular buildings mass produced and built in the early 1950s and 1960s. The single-family residence and ancillary structures are not unique in their age, or style. Buildings of unique architectural styles or those designed by important architects can provide a strong sense of time and place within the community. However, the buildings within the project boundaries do not make such contributions. The single-family residence and ancillary structures are not contiguous to or in context of historic residential or commercial activities. Similarly, the buildings are not documented to be associated with an important person who may have lived at the residence, or owned the property, or with a master architect who may have designed the buildings. Further, with building dates of 1953 and 1968, the single-family residence and ancillary structures do not reflect the early pioneer phase of Escondido in the mid-to-late 1800s or the early 1900s.

The single-family residence and ancillary structures were evaluated for historical significance using the California Register of Historic Resources (CRHR) criterion and the Escondido Local Register of Historical Resources (Local Register) outlined in the City's Municipal Code Section 33-794. The Architectural and Historic Evaluation (see Appendix E) determined that the buildings are not eligible under CRHR Criterion A or Local Register Criterion 1 for association with the City's early-to mid-twentieth century communities. In addition, the buildings are not eligible under CRHR Criterion C and Local Register Criterion 3 since they embody distinctive characteristics of vernacular design and building techniques commonly used in the 1950-1970 period, an era that embraces a period of substantial growth in Escondido and throughout San Diego County. Therefore, the project would not cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5, and impacts would be less than significant.

b. Potentially Significant Unless Mitigation Incorporated

An Archaeological Survey Report was prepared by RECON on September 11, 2024 (see Appendix F) and an Archaeological Excavation Report was prepared by RECON on July 9, 2025 (see Appendix G) in accordance with requirements of the City to avoid significant impacts to cultural resources under CEQA. The Archaeological Survey Report consisted of a records search, review of topographic maps and historic aerial photographs, requesting a Sacred Lands File search from the Native American Heritage Commission (NAHC), tribal scoping letters, and a pedestrian survey. The Archaeological Excavation Report included the methods and results of the significance excavation of an on-site archaeological resource.

Records Search

As discussed in the Archaeological Survey Report (see Appendix F), a records search was requested prior to the pedestrian survey on July 30, 2024, from the California Historical Resources Information System, SCIC to identify any previously recorded cultural resources within a one-mile radius of the

project area of potential effect (APE). The APE consists of the approximately 4.96-acre project site and 0.06-acre off-site improvement area. The SCIC records search indicated that there have been 57 cultural investigations conducted within one mile of the project APE, four of which include the project APE. The record search also indicated that 39 cultural resources are recorded within one mile of the project APE. As identified in Table 6, these cultural resources included 12 prehistoric sites, 2 prehistoric isolated artifacts, 1 multicomponent (comprising both prehistoric and historic-era resources) site, 1 protohistoric site, 22 historic resources, and 1 resource with an unknown time period. The prehistoric resources include bedrock milling features, lithic scatters, and ground stone scatters. The prehistoric isolated artifacts include one mano, as well as three secondary context artifacts (a biface, mano, and metate) that were noted in the recording through personal conversation with the property owner, to have been purchased in Arizona. The prehistoric resource includes bedrock milling features and habitation debris. The historic-era sites include single-family properties, a highway, a water tank, trees and vegetation, walls, and trash scatters. One resource location was recorded with insufficient data to assign site period and site type. No previously recorded cultural resources occur within the project APE.

Table 6
Previous Cultural Resources within One Mile of the Area of Potential Effect

Primary Number	Trinomial	Age	Site Type	Recording Events
P-37-000151	CA-SDI-000151	Unknown	Unknown	No Date (Treganza)
P-37-000152	CA-SDI-000152	Protohistoric	Bedrock milling feature; Habitation debris	No Date (Treganza); 1978 (P. Chace)
P-37-001036	CA-SDI-001036	Prehistoric	Lithic scatter; Bedrock milling feature	1962 (True); 2020 (Tim Wolfe, AECOM)
P-37-001049	CA-SDI-001049	Prehistoric	Lithic scatter, ground stone; Bedrock milling feature	1962 (True); 1985 (Robbins-Wade)
P-37-005210	CA-SDI-005210	Multi-component	Lithic scatter; Bedrock milling feature; Trash scatter	1977 (P. Chace); 1991 (ERC Environmental)
P-37-006726	CA-SDI-006726	Prehistoric	Bedrock milling feature	1978 (B. Bickford, Archaeological Associates)
P-37-006727	CA-SDI-006727	Prehistoric	Lithic scatter, ground stone	1978 (B. Bickford, Archaeological Associates)
P-37-006728	CA-SDI-006728	Prehistoric	Bedrock milling feature	1978 (B. Bickford, Archaeological Associates)
P-37-006729	CA-SDI-006729	Prehistoric	Lithic scatter; Bedrock milling feature	1978 (B. Bickford, Archaeological Associates)
P-37-007785	CA-SDI-007785	Prehistoric	Bedrock milling feature	1980 (D. Laylander)
P-37-009828	CA-SDI-009828	Prehistoric	Bedrock milling feature	1983 (Paul G. Chace, Paul G. Cace & Associates)
P-37-009829	CA-SDI-009829	Prehistoric	Bedrock milling feature	1983 (Paul G. Chace, Paul G. Cace & Associates)
P-37-009830	CA-SDI-009830	Prehistoric	Bedrock milling feature	1983 (Paul G. Chace, Paul G. Cace & Associates)
P-37-012543	CA-SDI-012543	Historic	Single-family property; Foundation; Trash scatter	1991 (ERC Environmental)
P-37-018704	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-018705	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-018706	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-018745	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-018746	--	Historic	Single-family property	1983 (Donald A. Cotton)

Table 6 Previous Cultural Resources within One Mile of the Area of Potential Effect				
Primary Number	Trinomial	Age	Site Type	Recording Events
P-37-018899	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019317	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019517	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019518	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019519	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019520	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-019574	--	Historic	Single-family property	1983 (Donald A. Cotton)
P-37-032874	--	Historic	Water tank	2012 (ASM Affiliates, Inc.)
P-37-033557	--	Historic	Roads/trails/railroad grades; Highway/trail	2013 (Larry Tift, ASM Affiliates, Inc.); 2015 (Kent Manchen, Matt DeCarlo, ASM Affiliates, Inc.); 2017 (Haley Chateene, PanGIS); 2017 (A. Foglia, K. Keckeisen, PanGIS, Inc.); 2018 (Sarah Stringer-Bowsher, ASM Affiliates, Inc.); 2021 (ASM Affiliates, Inc.)
P-37-035639	CA-SDI-022191	Historic	Wall	2016 (Laguna Mountain)
P-37-035640	CA-SDI-022192	Prehistoric	Lithic scatter; Bedrock milling feature	2016 (Laguna Mountain)
P-37-035641	--	Historic	Single-family property	2016 (Laguna Mountain)
P-37-037787	--	Historic	Single-family property; Trees/vegetation; Walls/fences	ASM Affiliates, Inc.
P-37-038782	--	Prehistoric	Isolate - mano	2019 (HELIX Environmental Planning Inc.)
P-37-038783	CA-SDI-022824	Prehistoric	Bedrock milling feature	2018 (HELIX Environmental Planning Inc.)
P-37-039446	--	Prehistoric	Isolate - biface, mano, metate (purchased in AZ)	2021 (Laguna Mountain)
P-37-039507	--	Historic	Single-family property	2021 (Laguna Mountain)
P-37-039508	--	Historic	Single-family property	2021 (Laguna Mountain)
P-37-039509	--	Historic	Single-family property	2021 (Laguna Mountain)
P-37-039510	--	Historic	Single-family property	2021 (Laguna Mountain)

Native American Heritage Commission and Tribal Scoping Letters

A letter was sent on July 30, 2024, to the NAHC requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the project. A response letter from the NAHC was received on August 15, 2024, indicating that the results were negative. The NAHC also provided a list of Native American tribes who may have knowledge of cultural resources within the project APE and vicinity.

Tribal scoping letters were sent via email or a hard copy letter on August 28, 2024, to the tribal list provided by the NAHC. A sample of the tribal scoping letter is found as Attachment 2 in Appendix F. RECON received one response from Ray Teran representing the Viejas Band of Kumeyaay

Indians (Viejas) on August 28, 2024, stating in part that Viejas has determined that the project site has cultural significance or ties to Viejas. The project includes mitigation measures intended to satisfy the Viejas tribe as detailed below.

Pedestrian Survey

A RECON archaeologist performed the pedestrian survey of the APE on August 21, 2024. The RECON archaeologist was accompanied by a Luiseño Native American monitor from Saving Sacred Sites. RECON identified one new multicomponent resource (10596-S-1; bedrock milling features and one historic glass fragment). The resource consists of eight granite bedrock milling features exhibiting 56 milling elements. The milling elements consist of 40 milling slicks, 10 basins, and 6 amorphous milling areas. The mix of low-lying to ground level granite boulders exhibit mild exfoliation, water-worn areas, fissures, several secondarily placed items, and some surface areas that were cleared of soil. Several secondarily placed items were observed atop bedrock milling features including a small boulder (currently atop milling elements) and a bathtub. One fragment of sun-colored amethyst glass was recorded; no other prehistoric items were observed. The bedrock milling features are located within a fenced area that receives periodic mowing. The resource is situated within a disturbed vegetation zone of small bushes, cacti, and seasonal grasses that receive periodic mowing, on a southwest-facing generally 15-degree slope with an open exposure, situated approximately 1,700 feet west-northwest of Escondido Creek.

Significance Excavation

Because the multicomponent resource was recorded during the archaeological survey, an evaluation was undertaken in accordance with the requirements of the City to avoid significant impacts to cultural resources under CEQA. As discussed in Archaeological Excavation Report (see Appendix G), RECON accompanied by a Luiseño Native American monitor from the Rincon Band of Luiseño Indians completed a significance excavation program for resource 105961-S-1 between June 3 and 6, 2025. RECON completed hand-excavation of 12 shovel test pits (STP) around the bedrock milling features. The excavation program yielded a sparse subsurface cultural deposit including 7 debitage pieces, 1 possible ground stone artifact, and 1 non-human bone fragment. Additionally, 13 pieces of debitage were collected from the surface. The majority of the artifacts were recovered within the upper 30 centimeters, with 2 pieces of debitage recovered from the 40-centimeter level in STP 10.

Conclusion

One new multicomponent resource (10596-S-1) was identified within the project APE during the archaeological survey. Because the significance excavation yielded a sparse subsurface cultural deposit and lacked artifact variety, 10596-S-1 was recommended not a significant cultural resource under CEQA or City criteria. For archaeological interests and concerns, this resource does not qualify under CEQA criteria 1, 2, and 3 since the bedrock milling feature site could not be associated with a significant event or a significant person by the archaeologists, and it does not possess a unique construction method according to mainstream archaeological definitions and determinations. The lack of artifact density and variety limits the resource's ability to answer archaeological questions of chronology, site formation, and subsistence; therefore, this resource does not qualify under criterion 4 as likely to yield important information to prehistory for archaeologists. Based upon the

results of the excavation program, archaeologists postulate that the resource was likely used as a grass and seed processing location rather than a short-term field camp.

Impacts to 10596-S-1 would not be significant because this resource has been recommended not eligible for listing on the CRHR or the Local Register. Nonetheless, because additional resources could be discovered during project construction, impacts related to cultural resources would be potentially significant. Mitigation measures TCR-1, -2, -3, -6, and -7, listed under Section 4.18 below would require archaeological and Native American monitoring during construction to prevent significant impacts to inadvertent discoveries. Project implementation of mitigation measures TCR-1, -2, -3, -6, and -7, would reduce potentially impacts to inadvertent discoveries of culturally significant resources to a less than significant level.

c. Less than Significant Impact

There are no dedicated cemeteries or recorded burials within the project footprint or surrounding area. Therefore, the potential for encountering human remains during construction is very low. In the unlikely event of a discovery of human remains, the project would be handled in accordance with the California Public Resources Code (§5097.98), State Health and Safety Code (§7050.5), and California Government Code section 27491. These regulations detail specific procedures to follow in the event of a discovery of human remains (i.e., work would be required to halt, and no soil would be exported off-site until a determination could be made via the County Coroner and other authorities as required). Adherence to these regulatory requirements in the event of an unanticipated discovery would ensure that the project would not disturb human remains, including those interred outside of dedicated cemeteries, and would reduce impacts to a less than significant level.

Mitigation Measures

See TCR-1, -2, -3, -6, and -7 under Section 4.18 below.

4.6 Energy

Would the project:

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

EXPLANATIONS:

a. Less than Significant Impact

Construction

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment and (2) energy used in the manufacturing of construction materials, such as asphalt and pipes.

Construction of the project would require the use of construction vehicles and equipment for hauling and building activities. Equipment for these types of activities is discussed in Section 4.3, Air Quality. As discussed therein, the project would employ standard construction activities and equipment. Construction equipment requiring electricity would be gas-powered or diesel-powered. Construction would also include construction worker vehicles traveling to and from the project site. It is not anticipated that the crew of workers required on-site would be greater than average job sites of projects of similar size. The scale and density of the residential development is unlikely to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Construction is likely to span approximately two years, generating between approximately 15 to 50 worker vehicle trips a day from the local area during most construction phases, with up to 52 hauling trips during the grading phase and 7 vendor trips during the building construction phase. This is standard for a project of this size and scale per CalEEMod defaults based on the proposed land use and density for the project. Furthermore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction projects. Therefore, the proposed short-term construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption, and impacts would be less than significant.

Operation

The operational impacts of the project would be comparable to similar uses in the City. Operational energy use would be associated with transportation-related fuel use and building-related energy use. New construction is required to meet mandatory energy standards in accordance with the version of the Title 24 Energy Code that is in effect at the time building permits are received. The 2022 Energy Code increases on-site renewable energy generation from solar, increases electric load flexibility to support grid reliability, reduces emissions from newly constructed buildings, reduces air pollution for improved public health, and encourages adoption of environmentally beneficial efficient electric technologies. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The 2022 California Green Building Standards Code (CALGreen) institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. The 2022 CALGreen includes residential mandatory measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, electric vehicle charging stations, lighting, water conservation, waste reduction, and building maintenance. Furthermore, as discussed in Section 4.8, the project would implement measures consistent with the City's Climate Action Plan (CAP). These measures include the installation of electric vehicle (EV) charging infrastructure in

each garage, installing pedestrian and bicycle infrastructure improvements, installing tankless water heaters with an electric heat pump water heaters in all proposed units, and planting trees. Therefore, operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

b. Less than Significant Impact

The applicable state plans that address renewable energy and energy efficiency are 2022 CALGreen, the 2022 Energy Code, and the Renewables Portfolio Standard (RPS). As discussed above in Section 4.6.a, the project would be required at a minimum to meet the mandatory energy requirements of the Energy Code and CALGreen in effect at the time of development. New construction and major renovations must demonstrate their compliance with the current Energy Code and CALGreen through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. The project would be served by SDG&E, who, under Senate Bill 350 (2015), is required to achieve a renewable energy mix goal of 60 percent by the year 2030. Based on the latest report to the legislature, SDG&E has obtained 59 percent renewables as of 2022 (California Public Utilities Commission 2023). Implementation of the project would not interfere with SDG&E's progress towards achieving RPS goals. In addition, the project would not conflict with the City's adopted CAP, which includes policies related to using energy more efficiently. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

4.7 Geology and Soils

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Geotechnical Investigation prepared by Geocon, Inc. (Appendix H).

a.i. Less than Significant Impact

The project site, as with most of southern California, is situated in an area of active and potentially active faults. However, the project site does not lie within an Alquist-Priolo Earthquake Fault Zone and there are no mapped Quaternary faults crossing or tending toward the project site. The nearest known active-fault zones are the Rose Canyon and Newport Inglewood Faults, located approximately 16 miles west of the project site. Therefore, the potential for direct surface fault rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

a.ii. Less than Significant Impact

The project site is in seismically active southern California and could be subject to strong seismic ground shaking from regional seismic activity in the event of a major earthquake on any of the faults described in Section 4.7.ai above or other faults in the southern California or northern Baja California, Mexico area. However, the project would be required to adhere to the City's General Plan Community Protection Element policies relating to seismic hazards, and all structures would be designed in accordance with seismic design recommendations detailed in the Geotechnical Investigation (see Appendix H) and within the seismic parameters of the current Uniform Building Code and Title 24 of the California Building Code (CBC). Adherence to these standards and regulations would ensure the project would not expose people or structures to seismic ground shaking, and impacts would be less than significant.

a.iii. Less than Significant Impact

Soil liquefaction occurs within relatively loose, cohesionless sands located below the water table that are subjected to ground accelerations from earthquakes. Due to the relatively dense nature of the granitic rock beneath the project site, and lack of near surface groundwater, the potential for liquefaction is considered very low (see Appendix H). Therefore, the project would not expose people or structures to adverse effects from seismic-related ground failure, including liquefaction, and impacts would be less than significant.

a.iv. No Impact

Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the Geotechnical Investigation (see Appendix H), no slopes with the potential for landslides were encountered on or near the project site during the field investigation. Therefore, the project would not cause or increase the potential for landslides. No impact would occur.

b. Less than Significant Impact

According to the Geotechnical Investigation (see Appendix H), the project site consists of two surficial soils including undocumented fill and topsoil, and one formation consisting of cretaceous-age granitic rock. The topsoil on the project site was found to not be suitable for the support of foundations or structural fill and remedial grading would be required. As such, the construction phase of the project would displace soils and temporarily increase the potential for soil erosion. However, the project would implement construction BMPs consistent with the requirements of the City's Storm Water Design Manual that would minimize erosion and loss of topsoil. Therefore, implementation of construction and operational BMPs would prevent substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c. Less than Significant Impact

As discussed under a.iii. and a.iv. above, the potential for liquefaction is considered very low and no slopes with the potential for landslides were encountered on or near the project site during the field investigation. Temporary excavations are anticipated to adhere to standard engineering practices, as

well as the project specific recommendations detailed in the Geotechnical Investigation (see Appendix H), which would prevent lateral spreading, subsidence, and settlement. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and impacts would be less than significant.

d. Less than Significant Impact

As discussed in the Geotechnical Investigation (see Appendix H), the soils encountered during the field investigation are considered to have a very low to low expansive potential (expansion index of 50 or less). Site preparation activities would remove any soils that would be seismically unstable. In addition, the project would adhere to all other geotechnical design recommendations provided in the Geotechnical Investigation (see Appendix H) related to seismic safety, as well as the seismic design parameters of the 2022 CBC. Therefore, the project would not be located on expansive soil, and impacts would be less than significant.

e. No Impact

The project would be connected to a public sewer system and does not include the installation of septic tanks or alternative wastewater disposal systems. No impact would occur.

f. Less than Significant Impact

According to the City's General Plan EIR (City of Escondido 2012a) and confirmed by the Geotechnical Investigation (see Appendix H), the project site is underlain by granitic and other intrusive crystalline rocks. Granitic and other intrusive crystalline rocks are considered to have no paleontological resource potential. Consequently, it is unlikely that paleontological resources would be located beneath the project site. Therefore, the project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature, and impacts would be less than significant.

4.8 Greenhouse Gas Emissions

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the CAP Consistency Checklist prepared by RECON (Appendix I).

a. Less than Significant Impact

State CEQA Guidelines Section 15064.4 states that "the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project."

Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that "the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." A cumulative impact may be significant when the project's incremental effect, though individually limited, is cumulatively considerable.

The City initially adopted its CAP in 2013, and most recently adopted an update in 2021 (City of Escondido 2021b). The CAP provides GHG emission inventories, projections, and reduction strategies and measures necessary to meet the City's 2030 and 2035 reductions targets. Implementation of these proposed strategies and measures demonstrates progress towards supporting the state's 2050 GHG emissions reduction goal. The City's CAP is a qualified GHG emissions reduction plan in accordance with State CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a CAP. Projects that are consistent with the General Plan and implement applicable CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. Conversely, projects that are consistent with the General Plan, but do not implement CAP GHG reduction measures, as well as GPAs and Annexations that increase emissions beyond CAP projections, would require a project-level GHG analysis.

Step 1 of the CAP Consistency Checklist is to determine if a project is consistent with the growth projections assumed in the CAP. Projects that are consistent with the existing General Plan land use designation would be consistent with the assumptions used in the CAP. If the project is not consistent

with the existing land use designation it may still be considered consistent with the CAP if it includes a GPA that would generate GHG emissions equal to or less than estimated emissions generated under the existing designation.

Step 2 of the CAP Consistency Checklist is to evaluate a project's consistency with the applicable strategies and measures of the CAP. The CAP establishes a GHG screening threshold of 500 metric tons of carbon dioxide equivalent (MT CO_2E) per year for new development projects to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist GHG reduction measures. Projects that exceed the established CAP threshold of 500 MT CO_2E per year would need to demonstrate consistency with CAP GHG reduction measures provided in Step 2.

As discussed in the CAP Consistency Checklist prepared for the project (see Appendix I), the project would not be consistent with the existing General Plan land use designation. However, the GPA would result in less GHG emissions than those that would be generated under the existing designation. GHG emissions associated with the project were calculated and compared to emissions associated with a project consistent with the existing SPA 13 Imperial Oakes Corporate Center land use designation. Based on the Transportation LMA (see Appendix B), the project would generate 560 daily trips. A Transportation Analysis Due Diligence memo was prepared for the project by Fehr and Peers (see Appendix C). The memo calculated trips associated with three alternatives that are consistent with the existing SPA 13 Imperial Oakes Corporate Center land use designation:

- Alternative 1 – General Office
- Alternative 2 – Industrial
- Alternative 3 – 80 percent General Office and 20 percent Industrial

The memo calculated project sizes for a 1.0 FAR (212,000 square feet) and 2.0 FAR (424,000 square feet) and used trip generation rates provided by both ITE and SANDAG. Based on the trip generation calculations, it was determined that the fewest trips would be generated by a 212,000-square-foot industrial project that generates 1,032 daily trips based on ITE trip rates. All other alternatives would generate more traffic and would therefore result in greater GHG emissions. GHG emissions associated with this alternative were calculated and compared to GHG emissions associated with the project. These projects would result in the following GHG emissions:

- 70 dwelling units or townhomes – 691 MT CO_2E per year
- 212,000 square feet industrial – 1,655 MT CO_2E per year

CalEEMod output for the project and the industrial project are provided in Attachments 1 and 2 to the CAP Consistency Checklist (see Appendix I). Because the project would result in less GHG emissions, it would be considered consistent with the projections assumed in the CAP.

Project emissions would exceed the City's screening level threshold of 500 MT CO_2E per year. Thus, the project would be required to implement the GHG reduction measures outlined in Step 2 of the CAP Consistency Checklist. Consistent with these measures, the project would implement the following which would be conditions of project approval:

- EV Charging Stations – The project would be constructed in accordance with 2022 Title 24, Part 6 Building Energy Efficiency Standards, and would install at least one EV charging station parking space in each new townhome. Since the project includes private garages, this standard can be met if the garages are equipped with a dedicated 208/240-volt branch circuit in the raceway required by 2022 CALGreen Section 4.106.4.1. The branch circuit and associated overcurrent protective device shall be rated at 40 amperes minimum.

- Pedestrian Infrastructure – The project would install pedestrian infrastructure improvements by constructing a new public sidewalk along its frontage of West El Norte Parkway. Additionally, the project would install an accessible ramp from the project site to the public sidewalk.

- Alternatively Fueled Water Heaters – The project would include tankless water heaters with an electric heat pump water heaters in all proposed units.

- Landscape Water Consumption – The project would offer rain barrels as an add-on option for each townhome.

- Tree Planting – The project proposes to install one tree for every four new parking spaces and at least one tree per each townhome.

As demonstrated through the CAP Consistency Checklist, the project would be consistent with the City's CAP. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

b. Less than Significant Impact

Executive Order (EO) S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan 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.

Each Scoping Plan builds upon the successful framework established by the initial Scoping Plan and subsequent updates, while also identifying new, technologically feasible, and cost-effective strategies to ensure that California meets increasingly stringent GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Scoping Plan updates

have continued to express optimism in meeting future year targets of 2050 and 2030, as evaluated in the 2014 and 2017 Scoping Plans (respectively), and most recently, the 2045 goal addressed in the 2022 Scoping Plan under EO B-55-18, which AB 1279 codified and expanded on.

As discussed under Section 4.8.a above, the project would be consistent with the City's CAP, which is a qualified GHG reduction plan that is consistent with the statewide GHG reduction targets. Because the project would be consistent with the CAP, it would not conflict with the Scoping Plan or SB 32. Furthermore, project emissions would decline beyond the project buildout year as a result of continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards and Southern California Edison's increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions, once fully constructed and operational, the project is in line with the GHG reductions needed to achieve the 2050 GHG emission reduction targets identified by EO S-3-05.

Regarding AB 1279, it is important to note that the state's carbon neutrality goal does not preclude any individual project from emitting GHG emissions. AB 1279 codifies EO B-55-18; however, its enactment was linked to the concurrent enactment of SB 905, which requires CARB to create a Carbon Capture, Removal, Utilization, and Storage Program that will fundamentally sequester carbon emitted by other projects. Therefore, the state's carbon neutrality goal does not preclude all individual projects from emitting GHG emissions. As discussed in Section 4.8.a above, the project would be consistent with the CAP, and therefore would be consistent with state GHG reduction goals and progress towards achieving carbon neutrality.

At the regional level, SANDAG's 2021 Regional Plan has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region. The 2021 Regional Plan is the 2050 RTP prepared by SANDAG and adopted in December 2021. The 2021 Regional Plan establishes an implementation plan for how the region will grow over the next 30 years. Developed in accordance with SB 375, the 2021 Regional Plan includes an SCS. An SCS demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning.

The SCS focuses on the following five main strategies, referred to as the 5 Big Moves, that will result in a more efficient transportation system:

1. Complete Corridors – Complete corridors act as the backbone of the entire regional transportation system, using technology, infrastructure improvements, pricing, and connectivity to support all forms of movement.

2. Transit Leap – Transit leap offers people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services.

3. Mobility Hubs – Mobility hubs are the centers of activity where a high concentration of people, destinations, and travel choices converge. They offer on-demand travel options and safe streets to enhance connections to high-quality transit while also making it easier for people to take short trips without needing a car.

4. Flexible Fleets – Flexible fleets offer people a variety of on-demand, shared vehicles, including microtransit, bikeshare, scooters, and other modes of transportation, to connect them to transit and make travel easy within Mobility Hubs.

5. Next Operating System (OS) – Next OS refers to an integrated digital platform that ties the transportation system together. Next OS enables the transportation system to be managed in real time so that people can be connected immediately to the modes of transportation that work best for them for any given situation and at any time.

SANDAG's 2021 Regional Plan is not directly applicable to the project because the underlying purpose is to provide direction and guidance on future regional growth (i.e., the location of new residential and nonresidential land uses) and transportation patterns throughout the City and greater San Diego County, as stipulated under SB 375. CARB has recognized that the approved 2021 Regional Plan is consistent with SB 375. The 2021 Regional Plan is generally consistent with the local government plans. Since the project is within the scope of development that was anticipated in the General Plan and it would not conflict with implementation of its key goals and 5 Big Moves, it would not result in growth that would conflict with the 2021 Regional Plan.

The project would not generate GHG emissions that have a significant impact on the environment because it would be consistent with the City's CAP. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be less than significant.

4.9 Hazards and Hazardous Materials

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through 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?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

EXPLANATIONS:

a. Less than Significant Impact

Construction

During construction of the project, potentially hazardous materials would likely be handled on the project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment as well as specific materials for building construction, such as asphalt and concrete. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project. Hazardous materials would be stored in designated areas away

from environmentally sensitive areas in quantities that would not pose significant hazard to the public in the event of a release.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration, California Department of Transportation, the Resource Conservation and Recovery Act, and the SDAPCD. Therefore, construction of the project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Operation

Project operation would require the use of limited amounts of hazardous materials such as common cleaning products, pesticides, and paint, all of which are routinely found in residential and commercial areas. The DTSC has primary regulatory authority for enforcing hazardous materials regulations. Additionally, state hazardous waste regulations are contained primarily in Title 22 of the California Code of Regulations. Furthermore, the California Occupational Safety and Health Administration has developed rules and regulations regarding worker safety around hazardous and toxic substances. If used, transported, and stored or disposed of properly, these materials do not pose a substantial risk or hazard to the public or the environment. Any potential impacts associated with the routine transport, use, or disposal of hazardous materials, although minimal, would be further minimized with adherence to applicable regulations. Therefore, operation of the project would not create a significant hazard to the public or the environment through routine use, transport, and disposal of hazardous materials, and impacts would be less than significant.

b. Less than Significant Impact

As described in Section 4.9.a, the project would handle all hazardous materials in accordance with all applicable federal, state, and local regulations. Furthermore, project construction would be required to implement the Division of Occupational Safety and Health of California Construction Safety Plan/Hazard Communication Program; in case of accidental release, the project would be required to comply with the Code of Federal Regulations Section 1910.120. Therefore, the project would not create upset and accident conditions that could result in the release of hazardous materials, and impacts would be less than significant.

c. Less than Significant Impact

No schools are within 0.25 miles of the project site. The nearest school to the project site is Escondido High School, which is located approximately 0.4 miles east of the project site. The project does not propose uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Therefore, the project would not emit hazardous emissions or handle

hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school, and impacts would be less than significant.

d. No Impact

Review of the DTSC Envirostor database (DTSC 2024) and the State Water Resources Control Board Geotracker database (2024), determined that there are no contaminated sites on or adjacent to the project site. Therefore, the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

e. No Impact

The nearest airport to the project site is Ramona Airport, located approximately 12.48 miles to the southeast. Review of the Airport Land Use Compatibility Plan for Ramona Airport determined that the project site is not located within a safety zone or noise exposure zone (County of San Diego 2022a). Additionally, the project site is not located within the vicinity of a private airstrip. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

f. Less than Significant Impact

Pursuant to Municipal Code Section 7-8, Emergency Operations Plan, the City must be responsible for the development of the City's emergency operation plan, which provides an outline for effective mobilization of all resources (I.e., fire protection services and police services) during a local emergency, state of emergency, or state of war. As of September 2024, the City has yet to adopt an emergency operation plan. The County of San Diego has adopted an emergency operation plan that provides insight on the mobilization of public and private resources on a county level during a state of emergency. According to the County of San Diego's Emergency Operation Plan Annex Q – Evacuation (County of San Diego 2022b), the closest major evacuation route from the project site is I-15, located approximately 0.23 miles to the west of the project site.

The City's General Plan Community Protection Element identifies emergency evacuation routes in Figure VI-1 (City of Escondido 2012b). As depicted in Figure VI-1, West El Norte Parkway is identified as an evacuation route leading to I-15. The project would not alter the existing circulation network, and changes would be limited to constructing a driveway connecting to West El Norte Parkway. Internal driveways would be 24 feet wide, which is consistent with the City's design standards and Fire Department requirements. Additionally, all construction activities would be required to comply with the City's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the project would not interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

g. Less than Significant Impact

Review of the California Department of Forestry and Fire Protection's (CAL FIRE's) fire hazard severity zone (FHSZ) maps and data determined that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE2025). Furthermore, the project site is located within

an urbanized portion of the City away from any urban/wildland interface. Rod McLeod Park to the north and vacant land owned by SDG&E to the west are sparsely vegetated and do not possess fuels that could exacerbate the spread of fire. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

4.10 Hydrology and Water Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Drainage Study prepared by Touchstone Development (Appendix J) and the Storm Water Quality Management Plan prepared by Touchstone Development (Appendix K).

a. Less than Significant Impact

Project construction would have the potential to generate erosion/sedimentation and pollutants that could impact water quality. However, the project would implement construction BMPs consistent with the requirements of the City's Storm Water Design Manual that would minimize erosion and prevent pollution from affecting water quality. The project would include a biofiltration basin (BMP 1) located on the southern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin (BMP 1) would provide hydromodification management flow control and storm water pollutant control to meet the requirements of the City's Storm Water Design Manual, which is a design manual for compliance with the City's Municipal Code (Chapter 22, Article 2) and regional Municipal Separate Storm Sewer Systems Permit (California Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) for storm water management. Therefore, the project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

b. Less than Significant Impact

The project would not use any groundwater. All water for the project would be provided by the Rincon Del Diablo Municipal Water District. Although the project would increase the amount of impervious surface on-site from 21,500 square feet to 113,028 square feet, the project would include 89,257 square feet of landscaping that would allow for groundwater recharge. Furthermore, water would continue to infiltrate through undeveloped land throughout the groundwater basin. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and impacts would be less than significant.

c.i – iv. Less than Significant Impact

The Drainage Study (see Appendix J) identified three drainage basins on the project site in the existing condition:

- Basin 1 consists of 1.18 acres on the west side of the project site, draining into an existing concrete brow ditch and leaving the site westerly.
- Basin 2 consists of 4.63 acres, covering the majority of the project site and draining north to south to an existing concrete drainage ditch that discharges to the curb line of West El Norte Parkway.
- Basin 3 consists of 0.65 acres located on the east side of the project site and sheet flows towards adjacent properties to the east.

Peak flows during the 100-year storm event in the existing condition are 17.27 cubic feet per second (cfs; see Appendix J). The project would increase the amount of impervious surface area from 21,500 square feet to 113,028 square feet, which would increase runoff from the project site. Additionally, the project would modify the drainage pattern on site to redirect all runoff from Basin 3 to Basin 2. The increase in impervious surface on-site would increase peak flows during the 100-year storm event from 17.27 cfs in the existing condition to 17.56 cfs in the unmitigated post-project condition. However, as discussed in Section 4.10.a above, the project would introduce a biofiltration basin (BMP 1) to treat and detain runoff prior to discharging off-site. As shown in Table 7 below, introduction of the biofiltration basin would reduce peak flows during the 100-year storm event from 17.27 cfs in the existing condition to 14.18 cfs in the mitigated post-project condition. Therefore, the project would not result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows, and would be less than significant.

Table 7
Existing and Post-Project 100-Year Storm Event Peak Flows

Drainage Basin	Existing Acreage	Proposed Acreage	Existing 100-year Storm Event Peak Flows (cfs)	Unmitigated Post-Project 100-year Storm Event Peak Flows (cfs)	Mitigated Post-Project 100-year Storm Event Peak Flows (cfs)
Drainage Basin 1	1.18	1.16	2.93	2.61	2.61
Drainage Basin 2	4.63	5.30	12.87	14.95	11.57
Drainage Basin 3	0.65	0.0	1.47	0.0	0.0
Total	**6.46**	**6.46**	**17.27**	**17.56**	**14.18**

cfs = cubic feet per second
SOURCE: Appendix J

d. No Impact

Review of Figure 4.9-3 of the City's General Plan Final EIR determined that the project site is not located within an area mapped as a Federal Emergency Management Agency flood zone (City of Escondido 2012a). The project site is located approximately 12.6 miles east of the Pacific Ocean, and therefore would not be subject to risk associated with tsunami. The nearest confined body of water is Dixon Lake, located approximately 3.0 miles northeast of the project site. Given this distance of 3.0 miles, the project would not be affected by a seiche. Therefore, the project would not be located within a flood hazard, tsunami, or seiche zone, or risk release of pollutants due to project inundation. No impact would occur.

e. Less than Significant Impact

Project construction would have the potential to generate erosion/sedimentation and pollutants that could impact water quality. However, the project would implement construction BMPs consistent with the requirements of the City's Storm Water Design Manual that would minimize erosion and prevent pollution from affecting water quality. The project would include a biofiltration basin (BMP 1) located on the southern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin (BMP 1) would provide hydromodification management flow control and storm water pollutant control to meet the requirements of the City's Storm Water Design Manual, which is a design manual for compliance with the City's Municipal Code (Chapter 22, Article 2) and regional Municipal Separate Storm Sewer Systems Permit (California Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) for storm water management.

As discussed in Section 4.10.a above, project construction would implement construction BMPs consistent with the requirements of the City's Storm Water Design Manual that would minimize erosion and prevent pollution from affecting water quality. The project would include a biofiltration basin (BMP 1) located on the southern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin (BMP 1) would provide hydromodification management flow control and storm water pollutant control to meet the requirements of the City's Storm Water Design Manual, which is a design manual for compliance with the City's Municipal Code (Chapter 22, Article 2) and regional Municipal Separate Storm Sewer Systems Permit (California Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) for storm water management. Furthermore, as described in Section 4.10.b above, the project would not decrease groundwater supplies or interfere with groundwater recharge. Therefore, the project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

4.11 Land Use and Planning

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

EXPLANATIONS:

a. Less than Significant Impact

The project is located within an urbanized environment with small pockets of undeveloped land. The project site is bounded by commercial and residential uses to the east, West El Norte Parkway followed by residential to the south, the Rod McLeod Park to the north, and vacant land owned by SDG&E to the west. The proposed townhomes would be constructed entirely within the project site and would be similar to the adjacent residential uses to the east and south. The proposed townhomes would be constructed entirely within the project site and would not affect the surrounding land use pattern. Similarly, the project would not alter the existing circulation network, and changes would be limited to constructing a driveway connection to West El Norte Parkway. The project would connect to utilities that are already serving the surrounding development. Therefore, the project would not physically divide an established community, and impacts would not be significant.

b. Less than Significant Impact

The project site has a General Plan land use designation of SPA 13 Imperial Oakes Corporate Center. The goal of the SPA 13 Imperial Oakes Corporate Center land use is to provide "opportunity areas" where the City will focus infrastructure improvements to promote development (and redevelopment), enhance job growth, increase housing options, and revitalize the community. According to Chapter II: Land Use and Community Form in the City's General Plan (City of Escondido 2012b), and the Escondido General Plan Update Traffic Impact Analysis (Linscott, Law and Greenspan, Engineers 2011), the proposed land use for the Imperial Oakes Corporate Center SPA #13, of which the project parcel is a part, is envisioned as a combination of 2,100,000 square feet of office land use (80 percent) and 550,000 square feet of industrial land use (20 percent). The SPA 13 Imperial Oakes Corporate Center area is currently developed with visitor service and general retail uses, church, office, Rod McLeod Park, single-family residential, and vacant land. Although the project site is currently designated as SPA 13 Imperial Oakes Corporate Center, a Specific Plan has not been adopted.

The project proposes a GPA to amend the existing land use designation of SPA 13 Imperial Oakes Corporate Center to Urban IV and a ZMA to amend the existing zoning from Professional Commercial (CP) to High Multiple Residential (R-4). The Urban IV land use allows for up to 24 dwelling units per one acre. The project would construct 70 dwelling units or townhomes on a 4.96-acre site, which would equate to approximately 14 dwelling units per acre. As identified in Table 1 above, surrounding land uses include SPA 13 to the north, east, and west, and Urban I (U1) to the south.

While the project would require physical and regulatory changes, the development of 70 townhomes would be consistent with planned growth under the City's adopted 2021-2029 6th Cycle Housing Element Update (City of Escondido 2021a). As required by Municipal Code Section 33-924, Coordination of CEQA Quality of Life Standards, and Growth Management Provisions, the project has been evaluated to ensure consistency with the City's General Plan Quality of Life Standards that are to be considered in comprehensive planning efforts as well as individual project review. As discussed in Table 8, the project would be consistent with all applicable quality of life standards.

Table 8
Consistency with General Plan Quality of Life Standards

Quality of Life Standard	Description	Consistency Analysis
Quality of Life Standard 1: Traffic and Transportation	Where existing street or intersection capacities are below level of service "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.	**Consistent.** As discussed in Section 4.17.a, study area intersections and roadway segment operations would operate at acceptable levels (i.e., level of service C or better) under post-project conditions. The project would be consistent with this quality of life standard.
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. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.	**Consistent.** As stated in Section 4.15.a.iii, school districts Will Serve letters issued for the project (Appendices L and M) documented there would be adequate capacity available to serve the students generated by the project. In addition, the Applicant would be required to pay school mitigation fees. The project would be consistent with this quality of life standard.
Quality of Life Standard 3: Fire Service	In urbanized areas of the City, an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time often (10) minutes for supporting companies shall be maintained. A minimum of seven (7) total fire stations each staffed with a PAU engine company shall be in place before the General Plan build-out. For outlying areas beyond a five (5) minute travel time or further than three (3) miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief. Travel time is the elapsed time from a verbal or computerized acknowledgment of the	**Consistent.** Section 4.15.a.i analyzes the potential for the project to impact adequate fire protection and emergency medical services. As part of the permitting process, the project will be reviewed by the Escondido Fire Department and the City of Escondido's (City's) Building Department to ensure that the project meets all relevant fire protection requirements, including response times and personnel availability. In addition, the project would be required to comply with City fire suppression standards including providing adequate fire access. Furthermore, the project would be required to pay development impact fees that are

Table 8 Consistency with General Plan Quality of Life Standards		
Quality of Life Standard	Description	Consistency Analysis
	dispatch by the responding unit at the moment of departure from the station to its arrival at the scene. Response time is the elapsed time from receiving a call for service to the responding unit's arrival at the scene. In the case of single-family residences "arrival at the scene" shall mean at the front door of the residence; for multi-family residences "arrival at the scene" shall mean at the street access to the involved building. The Fire Department intends to meet these times for no less than 90 percent of all emergency responses by engine companies.	applied to the funding of public facilities, including facilities, vehicles, and equipment, to offset the incremental increase in the demand for fire protection services that the project would create. The project would be consistent with this quality of life standard.
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 five (5) minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life-threatening incidents) of no more than six and one-half (6½) minutes. The Escondido Police standard includes the measurement of elapsed times from when the call is initially processed by the communication operator, the transfer of call information to the police officer, and the time of the field officer's arrival at the service call location. Resources will be allocated to organize patrol areas and to involve community members when appropriate to achieve Community Oriented Problem Solving (COPS) efforts. To the maximum economic extent Escondido Union School District's L.R. Green Middle School (above) Officers at Escondido's Police and Fire Central Operations Facility grand opening ceremony Escondido General Plan Vision and Purpose Page I-15 feasible, the Police Department will take aggressive enforcement action against crime trends, including maintenance procedures and incorporating community involvement and education as a means to deter potential incidents	**Consistent.** Section 4.15.a.ii analyzes the potential for the project to impact adequate police protection. Due to the project's proximity to police services as well as payment of public facility fees that go toward addressing the Escondido Police Department's needs in equipment and staffing, the project is not expected to impact response time or require the construction of additional facilities. The project would be consistent with this quality of life standard.
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.	**Consistent.** As discussed in Section 4.19.a, the project would connect to the existing sewer line within West El Norte Parkway and include a sewer lateral connection to each townhome. The project would be adequately serviced by the new wastewater connections and no other new or expanded water infrastructure would be necessary. The project would be consistent with this quality of life standard.

Table 8 Consistency with General Plan Quality of Life Standards		
Quality of Life Standard	Description	Consistency Analysis
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 parkland and/or open space for habitat preservation per 1,000 dwelling units. Urban recreational amenities such as exercise courses, urban trails, tree-lined shaded walkways, and plazas, etc. shall be focused in high intensity downtown and urban areas. Priority shall be given to acquiring land to expand Grape Day Park north of Woodward Avenue and developing neighborhood parks in urban areas with the greatest need. School playground areas may be included as park acreage, provided that neighborhood park amenities and facilities are accessible, approval is granted by the school district(s) and the facility is open to the public as determined by the City Council. Before build-out, the City shall provide a minimum of two (2) community centers. Other specialized recreation facilities shall be incorporated into the City's Master Plan for Parks, Trails, and Open Space	**Consistent.** As discussed in Section 4.16.a, parkland impacts from the project are anticipated to be minimal due to the inclusion of open space and recreational amenities on-site, including 45,522 square feet of open space and 7,028 square feet of recreational areas consisting of a pool/spa, tot lot, seating area, and play lawn. The slight increase in demand for public recreation facilities that could occur would be spread amongst the existing facilities within the City. In addition, the payment of development impact fees per Municipal Code Chapter 6 Article 18B would further reduce any project impacts related to parks. The project would be consistent with this quality of life standard.
Quality of Life Standard 7: Library Service	The public library system shall maintain a stock and staffing of two (2) collection items per capita and three (3) public library staff per 8,000 residents of the City of Escondido. The City shall provide appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the City before the buildout of the General Plan where feasible. The City shall continue to expand the role of technology in providing library services and resources to Escondido residents.	**Consistent.** Per the City's General Plan Update EIR (City of Escondido 2012a), the City does not currently meet this quality of life standard. To meet the proposed quality of life standards identified within the General Plan Update, the Escondido Public Library would need to provide the following by 2035: 79 staff, 420,000 collection items, and 102,333 square feet of facility space. As discussed in Section 4.15.a.v, impacts on library facilities were determined to be less than significant. The project would be consistent with this quality of life standard.
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.	**Consistent.** As discussed in Section 4.4, impacts to disturbed Diegan coastal sage scrub would require habitat-based mitigation. Mitigation measure BIO-1 would require purchase of available sage scrub credits from an approved mitigation bank within the local north San Diego County region. Therefore, the project would result in the preservation of 0.58 acres of sensitive habitat. The project would be consistent with this quality of life standard.

Table 8 Consistency with General Plan Quality of Life Standards		
Quality of Life Standard	Description	Consistency Analysis
Quality of Life Standard 9: Air Quality	The City shall establish a Climate Action Plan with feasible and appropriate local policies and measures aimed at reducing regional greenhouse gas emissions. Measures shall include, but not limited to, reducing the number of vehicular miles traveled, supporting public transportation, participating in the development of park-and-ride facilities, coordinating land-use approvals, accommodating facilities for alternative fuel vehicles, maintaining and updating the City's traffic signal synchronization plan, promoting local agriculture, increasing landscaping standards, promoting landscaping programs, and encouraging non-polluting alternative energy systems.	**Consistent.** The City developed an update to the 2013 Climate Action Plan (City of Escondido 2021b). As discussed in Section 4.8, the project would be consistent with the City's Climate Action Plan Checklist and would have less than significant impacts related to the generation of greenhouse gas emissions during construction and operation. The project would be consistent with this quality of life standard.
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.	**Consistent.** Section 4.19.b analyzes the project's potential for impacts related to water supply and infrastructure. Based on the project's air quality modeling, the project would result in a water and wastewater demand of approximately 11,204 gallons per day (4,089,602 million gallons per year or 12.5 acre-feet per year; refer to Attachment 1 of Appendix A). The project's estimated water demand of 12.5 acre-feet per year would represent less than one percent of the Rincon Del Diablo Water District's Urban Water Management Plan total water demand of 6,672 acre-feet for 2025. Additionally, the project would be required to comply with water efficiency standards in the 2022 California Building Energy Efficiency Standards and 2022 California Green Building Standards Code. As such, the project is not anticipated to exceed the General Plan buildout assumptions used in the Rincon Del Diablo Water District's Urban Water Management Plan. The project would be consistent with this quality of life standard.

Based on the analysis presented above, the project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation, and impacts would be less than significant.

4.12 Mineral Resources

Would the project:

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

EXPLANATIONS:

a. No Impact

The project site is located within an urbanized portion of the City. Mining operation in this area would conflict with uses surrounding the project site, making mineral resource extraction infeasible. Furthermore, the City's General Plan (City of Escondido 2012b) does not identify the presence of mineral resource deposits in the City. Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. No impact would occur.

b. No Impact

The City's General Plan (City of Escondido 2012b) does not identify the presence of any active mineral resource extraction operations in the City. Additionally, mining and extraction operations are not listed as a permitted or conditionally permitted use for any zone in the City's Zoning Ordinance. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impact would occur.

4.13 Noise

Would the project result in:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive ground borne vibration or ground borne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Noise Analysis prepared by RECON (Appendix N).

a. Potentially Significant Unless Mitigation Incorporated

Construction Noise Analysis

Construction/Grading

Noise level limits for construction activities are established in Sections 17-234 and 17-238 of the Municipal Code. It states that no construction equipment shall exceed a one-hour average sound level limit of 75 dB(A) L_{eq}. In addition, Municipal Code Section 17-234 states that construction activities are only permitted between 7:00 a.m. and 6:00 p.m. Monday through Friday, and 9:00 a.m. and 5:00 p.m. on Saturdays. Municipal Section 17-238 states that grading activities are only permitted between 7:00 a.m. and 6:00 p.m. Monday through Friday and provided a variance has been obtained in advance from the City Manager, between 10:00 a.m. and 5:00 p.m. on Saturday.

The project site is bounded by commercial and residential uses to the east, West El Norte Parkway followed by residential to the south, and Rod McLeod Park to the north. Noise associated with the construction of the project was modeled at a series of 12 receivers located at the adjacent properties. The results are summarized in Table 9. Construction noise contours are shown in Figure 7. SoundPLAN data is contained in Attachment 3 to Appendix N.

Table 9
Construction Noise Levels at Adjacent Receivers
[dB(A) L_{eq}]

Receiver	Land Use	Construction Noise Level
1	Single Family Residential	71
2	Single Family Residential	72
3	Single Family Residential	72
4	Mobile Home Residential	65
5	Mobile Home Residential	66
6	Mobile Home Residential	67
7	Mobile Home Residential	66
8	Undeveloped (Zoned Professional Commercial)	72
9	Undeveloped (Zoned Professional Commercial)	73
10	Undeveloped (Zoned Open Space)	72
11	Undeveloped (Zoned Open Space)	72
12	Undeveloped (Zoned Open Space)	71

dB(A) L_{eq} = A-weighted decibels equivalent noise level
SOURCE: Appendix N

As shown in Table 9, construction noise levels are anticipated to range from 65 to 73 dB(A) L_{eq} at the adjacent properties. Although the existing adjacent uses would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Additionally, construction activities would not occur before 7:00 a.m. or after 6:00 p.m. on Mondays through Fridays, before 9:00 a.m. or after 5:00 p.m. on Saturdays, and would not occur any time on Sundays and holidays in accordance with Sections 17-234 and 17-238 of the Municipal Code. Therefore, construction activities would not generate a substantial temporary increase in ambient noise levels, and impacts would be less than significant.

Image Source: NearMap (flown April 2025)



Project Boundary

Off-site Improvements

Receivers

Construction

60 dB(A) L_{eq}

65 dB(A) L_{eq}

70 dB(A) L_{eq}

75 dB(A) L_{eq}

0 Feet 200

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FIGURE 7
Construction Noise Contours

Drilling/Blasting

Figure 8 shows the locations of rock that are likely to require blasting based on the geotechnical surveys conducted for the project. The nearest occupied receiver to the blasting locations are the residences located south of West El Norte Parkway near modeled receiver locations 6 and 7. These residential property lines are located 145 feet from the southernmost location requiring blasting. An excavator with a mounted pneumatic hammer would generate a noise level of 75 dB(A) L_{eq} at 145 feet, and the blast would generate a noise level of 65 dB(A) L_{eq} at 145 feet. All other receivers are located at greater distances from the blasting locations and noise levels would be lower. Noise levels due to hammering and blasting would not exceed the City's noise level threshold of 75 dB(A) L_{eq}. Although the existing adjacent uses would be exposed to noise levels that could be heard above ambient conditions, the exposure would be temporary. In accordance with Sections 17-234 and 17-238 of the Municipal Code, construction activities, including all hammering and blasting, would not occur before 7:00 a.m. or after 6:00 p.m. on Mondays through Fridays, before 9:00 a.m. or after 5:00 p.m. on Saturdays, and would not occur any time on Sundays and holidays. Additionally, mitigation measure NOS-1 would require the blasting contractor to obtain a blasting permit and comply with all City requirements. Per blasting permit requirements, a pre-blast inspection shall be conducted, and all blasting operations shall be monitored by a seismograph located at the nearest structure. Additionally, the blasting contractor shall implement measures necessary to minimize noise related to blasting to the levels established in the Municipal Code. With implementation of mitigation measure NOS-1, blasting activities associated with the project would comply with the requirements of the Municipal Code, and impacts associated with temporary increases in noise levels would be reduced to a less than significant level.

Traffic Noise

On-site Noise Compatibility

Noise and land use compatibility is regulated by the Noise Element of the General Plan. Multi-family land uses are "normally acceptable" with noise levels up to 65 community noise equivalent level (CNEL), "conditionally acceptable" with noise levels from 60 to 70 CNEL, "normally unacceptable" with noise levels from 70 to 75 CNEL, and "clearly unacceptable" with noise levels above 75 CNEL. These noise level standards are applied at multi-family recreation areas and are not normally applied to balconies or patios.

Vehicle traffic noise level contours across the project site were calculated using SoundPLAN. These contours take into account the project area topography and the proposed buildings. Noise levels were also modeled at a series of first- through third-floor receivers located at the proposed recreation areas and around the proposed buildings. Vehicle traffic noise contours and receiver locations are shown in Figure 9. The results are summarized in Table 10. SoundPLAN data are provided in Attachment 4 to Appendix N.

Image Source: NearMap (flown April 2025)



0 Feet 120

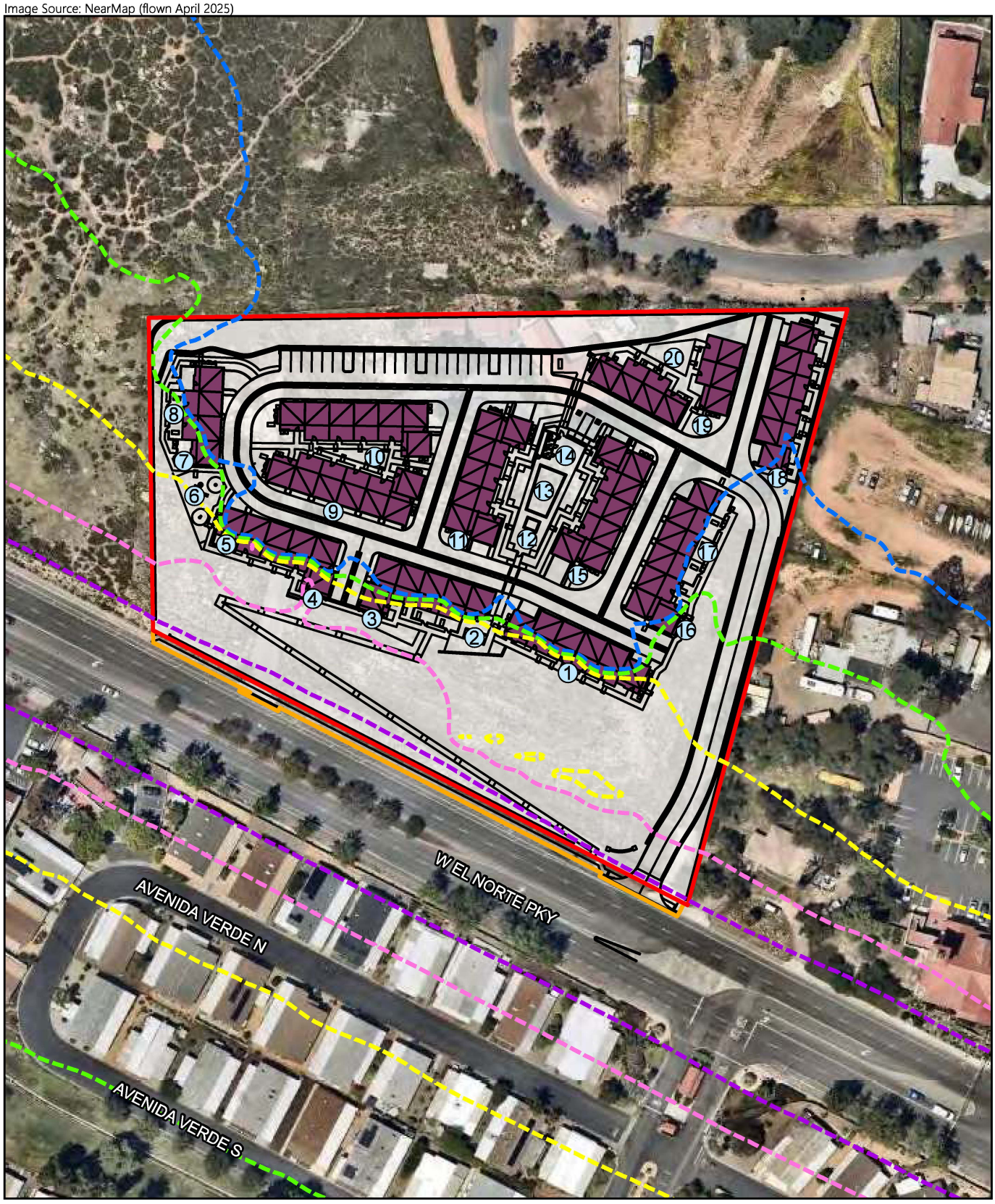
Project Boundary
Off-site Improvements
Hard Rock Potentially Requiring Blasting

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FIGURE 8
Potential Blasting Locations

Image Source: NearMap (flown April 2025)



Project Boundary
Off-site Improvements
Site Plan
Buildings
Receivers

Vehicle Traffic
50 CNEL
55 CNEL
60 CNEL
65 CNEL
70 CNEL

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FIGURE 9
Vehicle Traffic Noise Contours

Table 10 Vehicle Traffic Noise Levels (CNEL)				
Receiver	Location	1st Floor	2nd Floor	3rd Floor
1	Building 7	65	66	66
2	Recreation Area – Seating Area/Building 6	62	64	65
3	Building 6	65	67	67
4	Building 5	66	67	68
5	Building 5	64	66	67
6	Recreation Area – Tot Lot	60	63	64
7	Building 4	59	62	64
8	Building 4	58	61	62
9	Building 12	44	51	54
10	Building 11	30	33	38
11	Building 10	33	38	41
12	Recreation Area – Pool/Spa	43	46	52
13	Recreation Area – Pool/Spa	39	41	44
14	Recreation Area – Pool/Spa	38	39	42
15	Building 9	40	47	49
16	Building 8	57	59	59
17	Building 8	53	56	57
18	Building 1	53	56	57
19	Building 2 and 3	44	48	49
20	Recreation Area – Play Lawn	35	40	42
CNEL = community noise equivalent level SOURCE: Appendix N				

As discussed above, the noise level standard of 65 CNEL is applied at the multi-family recreation areas. As shown in Table 10 above, exterior noise levels at the seating area (Receiver 2) would be 62 CNEL, noise levels at the tot lot (Receiver 6) would be 60 CNEL, noise levels at the pool/spa area would range from 38 to 43 CNEL, and noise levels at the play lawn would be 35 CNEL. Noise levels would not exceed 65 CNEL at these multi-family recreation areas, and the project would be compatible with the City's exterior noise level standards. Therefore, the project would not expose receivers to exterior noise levels in excess of standards established in the City's General Plan, and impacts would be less than significant.

Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration's Highway Traffic Noise Analysis and Abatement Guidance, buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 decibels (dB), while light-frame structures with double-glazed windows may provide noise level reductions of 20 to 25 dB (Federal Highway Administration 2011).

The interior noise level standard for residential uses is 45 CNEL. As shown in Table 10 above, exterior noise levels at Buildings 1 through 4 and 8 through 12 would be 64 CNEL or less. Standard light-frame construction would reduce exterior to interior noise levels by at least 20 dB. This analysis

conservatively assumes that standard construction techniques would achieve 20 dB exterior to interior noise reduction. Using this assumption, interior noise levels would be reduced to less than 45 CNEL in Buildings 1 through 4 and 8 through 12.

Buildings 5, 6, and 7 would be located closer to West El Norte Parkway and as shown in Table 10 above, exterior noise levels would reach up to 68 CNEL. Because a standard 20 dB reduction would not achieve interior noise levels of 45 CNEL or less, a more detailed evaluation of interior noise levels was conducted. The STC rating of windows, walls, and roofs is an integer value that rates how well a building component attenuates noise. The STC rating generally reflects the dB reduction that a building component can achieve. Noise levels on the southern side of these units would reach up to 68 CNEL. Therefore, because a noise reduction of up to 23 dB(A) is required to achieve interior noise levels of 45 CNEL or less, building components with an STC rating of up to 23 would be required. Standard walls and roofs typically have STC ratings greater than 40 and therefore would achieve the required noise reduction. In order to achieve an interior noise level of 45 CNEL or less in Buildings 5, 6, and 7, windows with an STC of 23 or greater would be required. The inclusion of windows with an STC of 23 in these buildings shall be a condition of project approval. Therefore, the project would not expose receivers to interior noise levels in excess of standards established in the General Plan, and impacts would be less than significant.

Off-Site Vehicle Traffic Noise

The project would increase traffic volumes on West El Norte Parkway. The increase in off-site noise levels was calculated as part of the noise analysis prepared for the project (see Appendix N). General Plan Noise Policy 5.3 requires noise attenuation for outdoor spaces in all developments where projected incremental exterior noise levels exceed those shown in Table 11.

Table 11
Exterior Incremental Environmental Noise Impact Standards for Noise-sensitive Uses

Residences and Buildings Where People Normally Sleep[1]		Institutional Land Uses With Primarily Daytime and Evening Uses[2]	
Existing CNEL	Allowable Noise Increment [dB(A)]	Existing Peak Noise Level [dB(A) L_{eq}]	Allowable Noise Increment [dB(A)]
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

CNEL = community noise equivalent level; dB(A) = A-weighted decibel; L_{eq} = average noise level
NOTE: Noise levels are measured at the property line of the noise-sensitive area.
[1]This category includes homes, hospitals, and hotels where nighttime sensitivity to noise is assumed to be of utmost importance.
[2]This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.
SOURCE: Appendix N

The increase in off-site noise levels adjacent to West El Norte Parkway is presented in Table 12. Calculations are provided in Attachment 5 to Appendix N.

Table 12 Off-Site Vehicle Traffic Noise Levels (Community Noise Equivalent Level)					
Roadway Segment	Existing	Existing + Project	Direct Increase over Existing	Existing + Cumulative + Project	Cumulative Increase over Existing
West El Norte Parkway					
Seven Oaks Road to Commercial Driveway	71.0	71.1	0.1	71.4	0.4
Commercial Driveway to Project Driveway	71.0	71.2	0.2	71.5	0.5
Project Driveway to South Iris Lane	71.5	71.6	0.1	71.8	0.3
SOURCE: Appendix N					

As shown in Table 12 above, the project would result in noise level increases of 0.5 dB or less. The project would not exceed the allowable noise level increases. It should be noted that 3 dB is considered a barely perceptible change in noise levels; therefore, an increase of 0.5 dB or less would not be an audible change in noise levels. Therefore, operational roadway noise would not generate a substantial permanent increase in ambient noise levels for off-site noise sensitive land uses, and impacts would be less than significant.

On-Site Generated Noise

The primary on-site noise sources would be heating, ventilation, and air conditioning equipment. Using the on-site noise source parameters described in the noise analysis prepared for the project (see Appendix N), noise levels were modeled at a series of 12 receivers located at the adjacent uses. Modeled receivers and daytime and nighttime operational noise contours are shown in Figures 10a and 10b, respectively. Modeled data is included in Attachment 6 to Appendix N. Operational noise levels are summarized in Table 13.

Table 13 Heating, Ventilation, and Air Conditioning Noise Levels at Adjacent Receivers [dB(A) L_{eq}]			
Receiver	Land Use	HVAC Noise Level	
		Daytime	Nighttime
1	Single Family Residential	48	45
2	Single Family Residential	43	40
3	Single Family Residential	37	34
4	Mobile Home Residential	33	30
5	Mobile Home Residential	34	31
6	Mobile Home Residential	36	33
7	Mobile Home Residential	35	32
8	Undeveloped (Zoned Professional Commercial)	40	37
9	Undeveloped (Zoned Professional Commercial)	46	43
10	Undeveloped (Zoned Open Space)	41	38
11	Undeveloped (Zoned Open Space)	42	39
12	Undeveloped (Zoned Open Space)	40	37
dB(A) L_{eq} = A-weighted decibels equivalent noise level; HVAC = heating, ventilation, and air conditioning SOURCE: Appendix N			

Image Source: NearMap (flown April 2025)



Project Boundary
Off-site Improvements
Receivers
Site Plan
HVAC
Buildings

Daytime HVAC
40 dB(A) L_{eq}
45 dB(A) L_{eq}
50 dB(A) L_{eq}
55 dB(A) L_{eq}
60 dB(A) L_{eq}

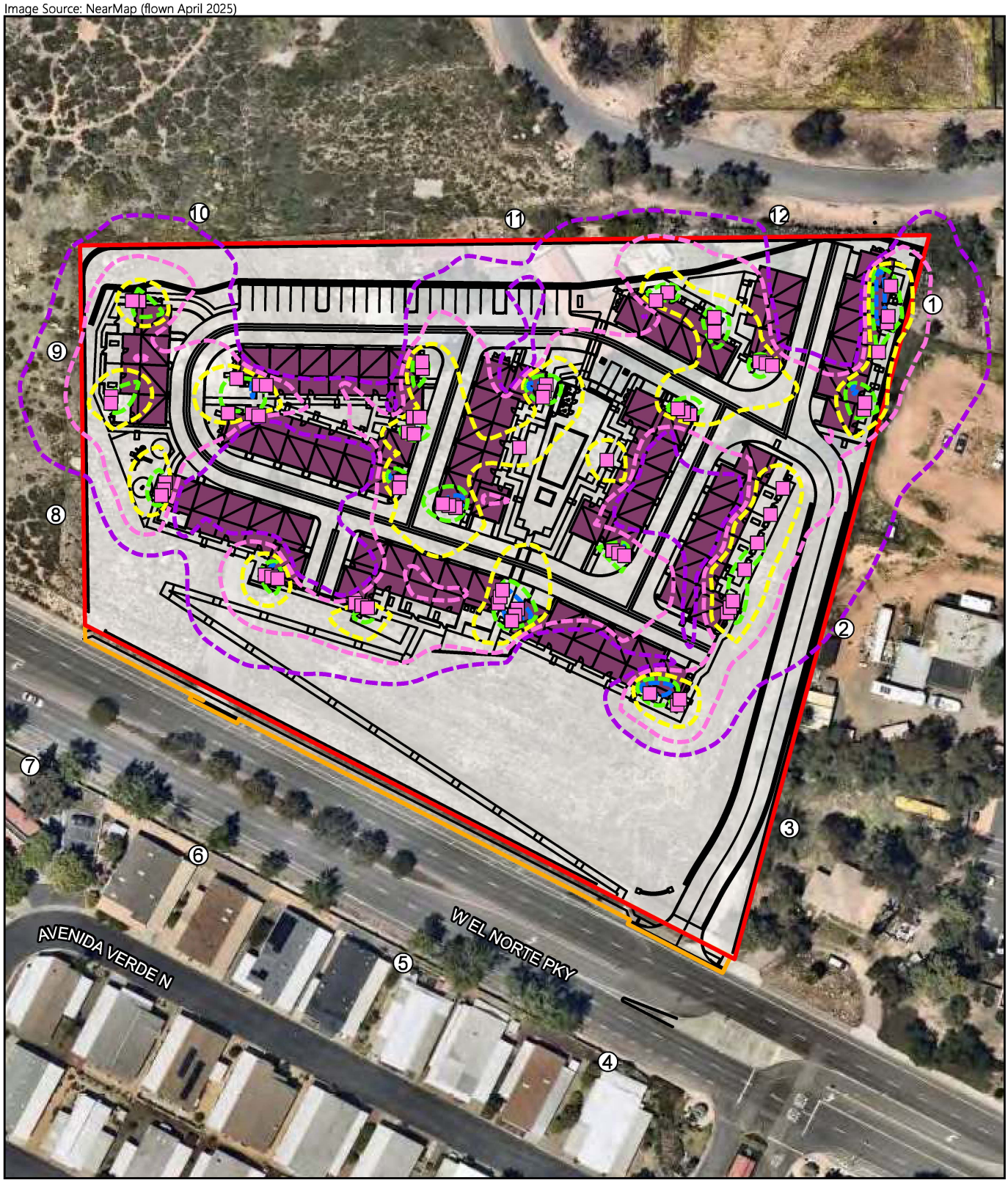
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FIGURE 10a
Daytime HVAC Noise Contours

Image Source: NearMap (flown April 2025)



Project Boundary
Off-site Improvements
Receivers
Site Plan
HVAC
Buildings

Daytime HVAC
40 dB(A) L_{eq}
45 dB(A) L_{eq}
50 dB(A) L_{eq}
55 dB(A) L_{eq}
60 dB(A) L_{eq}

0 Feet 100

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FIGURE 10b
Nighttime HVAC Noise Contours

As shown in Table 13 above, daytime heating, ventilation, and air conditioning noise levels would range from 33 to 48 dB(A) L_{eq} at the adjacent property lines and nighttime noise levels would range from 30 to 45 dB(A) L_{eq}. These noise levels would not exceed the City's most restrictive daytime and nighttime noise level limits of 50 and 45 dB(A) L_{eq}, respectively. Therefore, operational noise would not generate a substantial permanent increase in ambient noise levels in excess of limits established in the Municipal Code, and impacts would be less than significant.

b. Potentially Significant Unless Mitigation Incorporated

Human reaction to vibration is dependent on the environment the receiver is in, as well as individual sensitivity. For example, outdoor vibration is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying (Federal Transit Administration [FTA] 2018). Based on several federal studies, the threshold of perception is 0.035 inches per second (in/sec) peak particle velocity (PPV), with 0.24 in/sec PPV being distinctly perceptible (Caltrans 2013). Based on best available data, impacts for hydraulic breakers, or hammers, and other non-transient sources such as those associated with project construction shall be considered significant if the PPV exceeds 0.2 in/sec. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Construction activities produce varying degrees of ground vibration, depending on the equipment and methods employed. While ground vibrations from typical construction activities rarely reach levels high enough to cause damage to structures, special consideration must be made when sensitive or historic land uses are near the construction site. The construction activities that typically generate the highest levels of vibration are blasting and impact pile driving. As discussed, due to the presence of large rock outcrops on the project site, blasting may be required during construction activities. When a blast is detonated, only a portion of the energy is consumed in breaking up and moving the rock. The remaining energy is dissipated in the form of seismic waves expanding rapidly outward from the blast, either through the ground (as vibration) or through the air (as air overpressure or airblast). Groundborne vibration would also be generated during the hammering or drilling activities required prior to the blast.

Vibration levels associated with the use of mounted impact hammers or drills are 0.089 in/sec PPV at 25 feet (FTA 2018). This vibration level would exceed the significance criteria of 0.2 in/sec PPV at distances of 12 feet or closest. There are no structures within 12 feet of any potential hammering/drilling and blasting locations. Therefore, groundborne vibration impacts due to hammering or drilling would be less than significant.

Vibration levels associated with blasting are site-specific and are dependent on the amount of explosive used, soil conditions between the blast site and the receptor, and the elevation where blasting would take place (specifically, how far below surface elevation where bedrock would be encountered). At the current stage of project design, a blasting and monitoring plan has not been completed; thus, specifics, such as the explosive, blasting quantities, and exact locations, have not been identified. However, it can be assumed all blasting locations would be within the boundaries of the non-rippable rock (see Figure 8). As discussed, existing structures are located 145 feet or more from the blasting locations. In the absence of specific blast locations, frequency, and duration, it is possible that certain activities could exceed the threshold of 0.2 in/sec PPV, which would result in a potentially significant impact. Implementation of mitigation measure NOS-1 would reduce potential

significant impacts to a less than significant level because it would require vibration generated by blasting to be at or below 0.2 in/sec PPV.

For all other construction activities, the equipment with the greatest potential to generate vibration would be a large bulldozer. According to the FTA, large bulldozers generate vibration levels of 0.089 in/sec PPV at 25 feet. Unlike blasting, which has the potential to occur only in specific locations on the project site, vibration levels due to all other equipment were assessed over the entire project site. The nearest structure is located as close as 50 feet from the project boundary. A vibration level of 0.089 in/sec PPV at 25 feet would attenuate to 0.042 in/sec PPV at 50 feet. While it may be barely perceptible, it would be less than 0.2 in/sec PPV. Furthermore, large construction equipment would work immediately adjacent to the property lines only for short periods of time and would be operating at greater distances from the adjacent structures as construction occurs throughout the entire project site. Therefore, aside from blasting activities, project construction would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant. Operation of the project would not generate groundborne noise or vibration. No impact would occur.

c. No Impact

The nearest public use airport to the project site is Ramona Airport, located approximately 12.48 miles to the southeast of the project site. This airport is open to the public for use and owned and operated by the County of San Diego. Review of the Airport Land Use Compatibility Plan for Ramona Airport determined that the project site is not located within a noise exposure zone (County of San Diego 2022a). Additionally, the project site is not in the vicinity of a private airstrip. Therefore, the project would not expose people residing or working in the area to excessive noise levels. No impact would occur.

Mitigation Measures

NOS-1: If blasting and associated rock drilling are deemed necessary for the construction of project components, the blasting contractor shall obtain a blasting permit and comply with all City requirements. Per blasting permit requirements, a pre-blast inspection shall be conducted, and all blasting operations shall be monitored by a seismograph located at the nearest structure. Additionally, the blasting contractor shall implement measures necessary to minimize noise related to blasting to the levels established in the Municipal Code. If rock drill staging occurs within 145 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dB(A) L_{eq} at property lines. A noise mitigation plan based upon the location of the construction equipment, topography, and construction schedule shall be prepared by an acoustical consultant. The noise mitigation plan shall identify measures to reduce sound levels to below 75 dB(A) L_{eq}. Such measures could include a temporary noise barrier along any property line where the impacts could occur. The proposed noise barrier shall be of solid non-gapping material to adequately reduce construction noise levels below the noise threshold of 75 dB(A) L_{eq} at the property lines. The noise mitigation plan shall determine the final height and location of a temporary barrier if one is necessary. The mitigation plan may also identify location and timing restrictions on drilling equipment usage. The mitigation plan shall be submitted to the City for review and approval prior to initiation of rock drill staging activities within 145 feet of any occupied noise sensitive land use.

4.14 Population and Housing

Would the project:

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

EXPLANATIONS:

a. Less than Significant Impact

A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The project would require a GPA from SPA 13 Imperial Oakes Corporate Center to Urban IV. Although the project site is currently designated as SPA 13 Imperial Oakes Corporate Center, a Specific Plan has not been adopted. The Urban IV land use allows for up to 24 dwelling units per one acre and the project would construct 70 dwelling units or townhomes on a 4.96-acre site, which would equate to approximately 14 dwelling units per acre. The project would also require a zone change from Professional Commercial (CP) to High Multiple Residential (R-4). As described under Section 2.0 of this IS/MND, the project proposes a variety of housing plans which are consistent with the High Multiple Residential (R-4) zone.

Per the SANDAG Series 15 growth forecast, the population within the City was estimated to be 150,679 in 2022 and is estimated to increase by 4,610 people to 155,289 in 2040 (SANDAG 2024). Therefore, the project would accommodate population growth that is already anticipated within the City. Furthermore, the addition of 70 townhomes would be consistent with planned housing growth under the City's 2021-2029 6th Cycle Housing Element Update, which is projected to increase from 49,211 units in 2020 to 55,826 units in 2040 (City Escondido 2021a). Furthermore, the project would not extend any existing roads or expand existing infrastructure facilities that could induce growth. Therefore, the project would not induce substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

b. Less than Significant Impact

The project would demolish one existing single-family residence and construct 70 townhomes, thereby resulting in a net increase of 69 residential units. Therefore, the project would not displace substantial numbers of existing people or housing and would instead increase housing within the City. Impacts would be less than significant.

4.15 Public Services

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

EXPLANATIONS:

a.i. Less than Significant Impact

Fire protection services would be provided by the Escondido Fire Department (EFD). The fire station closest to the project site is EFD Station 3, located at 1808 North Nutmeg Street, approximately 0.7 miles northwest of the project site. As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized in the City's fire protection planning. The project would be subject to policies contained in the Growth Management and Community Protection Elements of the City's General Plan. These policies specifically address fire protection services and are intended to reduce impacts associated with fire protection. The City's Quality of Life Thresholds

are used as the standard to assess the relative impact of new service demands and are periodically reviewed and revised to ensure that they reflect appropriate service delivery and measurement techniques (City of Escondido 2012b). As part of the permitting process, the project will be reviewed by the EFD and the City's Building Department to ensure that the project meets all relevant fire protection requirements, including response times and personnel availability. In addition, the project would be required to comply with City fire suppression standards including providing adequate fire access. Furthermore, the project would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B that are applied to the funding of public facilities, including fire stations, to offset the incremental increase in the demand for fire protection services generated by the project. Therefore, the project would not result in the need for new or physically altered fire protection facilities, and impacts would be less than significant.

a.ii. Less than Significant Impact

The Escondido Police Department provides law enforcement services to the City, including the project site. The Escondido Police Department headquarters is located at 1163 Centre City Parkway, which is located approximately 0.8 miles southeast of the project site. As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized in the City's police protection planning.

The project would be subject to policies contained in the Growth Management and Community Protection Elements of the City's General Plan. These policies specifically address police protection services and are intended to reduce impacts associated with police protection. The City's Quality of Life Thresholds are used as the standard to assess the relative impact of new service demands and are periodically reviewed and revised to ensure that they reflect appropriate service delivery and measurement techniques (City of Escondido 2012a). Specifically, Community Protection Element Policy 3.1 requires the City to regularly review and implement appropriate plans for police protection and services that address staffing, facility needs, and service goals to ensure that the community's needs are met (City of Escondido 2012a). Additionally, project construction would be subject to compliance with Municipal Code Title 18, Building Code and Regulations, which adopts by reference the CBC. Chapter 33, Safeguards During Construction, of the CBC includes emergency access requirements which would minimize site safety hazards and potential construction-related impacts to police services. Examples of minimization activities would include ensuring construction materials are properly secured overnight. Compliance with existing regulations would ensure impacts on police services during construction are less than significant. Furthermore, the project would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B that are applied to the funding of public facilities, including police stations, to offset the incremental increase in demand for police protection services generated by the project. Therefore, the project would not result in the need for new or physically altered police protection facilities, and impacts would be less than significant.

a.iiii. Less than Significant Impact

The project received Will Serve letters from Escondido Union School District (see Appendix L) and Escondido High School Union School District (see Appendix M). Both districts indicate that they can serve the project. As a residential development, the applicant would be required to pay development

impact fees that would help fund ongoing school service and new facilities. Pursuant to SB 50 (Government Code Sections 65995[h], 65996[b], and 65996[h]), fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. The payment of statutorily capped fee amounts provides "full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities" (SB 50). The Escondido Union School District collects residential and commercial developer fees for projects within its service area to support costs of construction and expansion of school facilities. The Applicant would be required to pay development impact fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h), 65996(b), and 65996(h) in effect at the time of building permit issuance. Therefore, the project would not result in the need for new or altered school facilities, and impacts would be less than significant.

a.iv. Less than Significant Impact

As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized in the City's park planning. Consequently, the project would not substantially increase demand for local and regional parks. Additionally, the inclusion of open space and recreational amenities on-site, including 45,522 square feet of open space and 7,028 square feet of recreational areas, would reduce usage of local and regional parks. Furthermore, the project would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B that are applied to the funding of public parks to offset the incremental increase in demand for parks generated by the project. Therefore, the project would not result in the need for new or altered park facilities, and impacts would be less than significant.

a.v. Less than Significant Impact

The analysis within Sections 4.15.a.i through 4.15.a.iv concluded that the project would have a less than significant impact related to fire protection, police protection, schools, and parks. Other public services would include library facilities. Per the City's General Plan Update EIR (City Escondido 2012a), the City does not currently meet the quality of life standards assigned to library services; however, the General Plan recommends expanding the City's existing library facilities to meet the needs of its expanding population. Specifically, to meet the proposed quality of life standards identified within the General Plan Update, the Escondido Public Library would need to provide the following by 2035: 79 staff, 420,000 collection items, and 102,333 square feet of facility space. Consistent with General Plan Update policies focused on library services, the City will continue to improve library staffing, inventory, and programs to meet its goal. As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized in the City's library planning. Furthermore, the project would be required to pay development impact fees that are applied to the funding of public facilities, including libraries, to offset the incremental increase in demand for library services generated by the project Therefore, the project would not result in the need for new or altered library facilities, or any other public facilities, and impacts would be less than significant.

4.16 Recreation

Would the project:

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

EXPLANATIONS:

a. Less than Significant Impact

As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized in the City's fire protection planning. Consequently, the project would not substantially increase demand for local and regional parks. Additionally, the inclusion of open space and recreational amenities on-site, including 45,522 square feet of open space and 7,028 square feet of recreational areas, would reduce usage of local and regional parks. Furthermore, the project would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B would further reduce any project impacts related to that are applied to the funding of public parks to offset the incremental increase in demand for parks generated by the project. Therefore, the project would not result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

b. Less than Significant Impact

As discussed in Section 4.16.a, the project would include on-site recreational amenities, including 7,028 square feet of recreational areas and 45,522 square feet of common open space. These amenities would be located entirely within the project footprint. Consequently, potential impacts associated with proposed on-site recreation facilities have been considered within this environmental document. Therefore, the project would not have an adverse physical effect on the environment due to the construction or expansion of recreational facilities. Impacts would be less than significant.

4.17 Transportation

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with the applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with 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)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

EXPLANATIONS:

The following section is based on the Transportation LMA prepared by C2 Consulting Collective (see Appendix B) and the VMT Review prepared by C2 Consulting Collective (Appendix O).

a. Less than Significant Impact

The City's Transportation Impact Analysis Guidelines (TIAG) provides criteria on how projects should be evaluated for consistency related to the City's transportation goals, policies, and plans through procedures established under CEQA (City of Escondido 2021c). The Transportation LMA (see Appendix B) was prepared for the project in compliance with the City's TIAG and City staff direction. The Transportation LMA is required by the City's General Plan to assess transportation effects, promote orderly project development, ensure adequate land development site planning and

infrastructure, and consistency with the General Plan. The City's TIAG provides guidance on the extent of the study area. The project is located on West El Norte Parkway, a Major Road, per the City's General Plan Mobility and Infrastructure Element. The study area was selected based on this guidance and vetted through the Scoping Agreement process with City staff, regardless of whether the LMA trigger was met or not.

As discussed in the Transportation LMA (see Appendix B), the project is forecast to generate approximately 560 trips per day, which includes approximately 45 AM and 56 PM peak hour trips. Traffic volumes within the study area were commissioned in October and November 2024, while adjacent schools were in session. Traffic counts were conducted on a 24-hour machine for AM and PM peak hours to capture daily and commuter peak periods activity, respectively. The General Plan's Quality of Life standard strives for a LOS C to ensure a smoothly operating street network (City of Escondido 2012b). The Transportation LMA study intersections were found to operate at acceptable operations (i.e., LOS C or better) and no deficiencies were identified under all conditions and under all intersection control types. Roadway segment operations were likewise determined to operate at acceptable operations (i.e., LOS C or better) and no deficiencies were identified under all conditions. Therefore, the project would not conflict with applicable policies related to circulation in the City's General Plan, and impacts would be less than significant.

Bicycle Facilities

The Transportation LMA (see Appendix B) determined that existing bicycle demand is very low, and implementation of the project would not measurably change the local bicycle demand. No planned improvements along West El Norte Parkway were identified in the City's Bike Master Plan and the existing bicycle infrastructure along West El Notre Parkway is generally sufficient. Furthermore, implementation of the project would not alter bicycle routes or introduce new traffic conflicts. Therefore, the project would not conflict with the City's Bike Master Plan, and impacts would be less than significant.

Pedestrian Facilities

The Transportation LMA (see Appendix B) determined that the project would improve the existing pedestrian infrastructure with frontage improvements by replacing the existing asphalt sidewalk with a new concrete sidewalk. In addition, the project would provide direct pedestrian access via an ADA accessible path to West El Norte Parkway. This is consistent with the City's General Plan Mobility and Infrastructure Element Pedestrian Network Policy 3.3, which addresses the development of pedestrian environment that is accessible to all (City of Escondido 2012b). Existing pedestrian demand was determined to be low, and the project would not measurably change the local pedestrian demand or alter pedestrian movement patterns. Therefore, the project would not conflict with applicable policies in City's General Plan related to pedestrian facilities, and impacts would be less than significant.

Transit

The North County Transit District operates transit services within the study area, with bus route 358/359 serving westbound and eastbound travel on West El Norte Parkway, respectively. Two bus stops are located near the project site, east of the project driveway. Additionally, bus route 356

intersects with Morning View Drive to the east of the project site, with a bus station located approximately 0.25 miles from the project site. The transit stops in the immediate project vicinity are considered "Basic Stops." Basic Stops are characterized by the presence of a bus stop sign only, and do not contain passenger amenities like benches or shelters. These stops are generally utilized in rural areas or those areas with lower density and lower ridership. The City is focused on developing a Complete Streets Road design changing orientation toward building streets primarily for cars by instituting smart growth policies that expand transportation choices to ensure roads function as a truly "multimodal" transportation network (City of Escondido 2012b). One aspect of Complete Streets is improved transit, especially within areas that can support increased public transportation ridership and reduced reliance on personal automobiles. The Transportation LMA (see Appendix B) determined that given the project size, the surrounding lower density area, and anticipated lower transit ridership, no transit-related improvements are recommended. Construction of the project and future area development would help increase future demand for transit in the area. Therefore, the project is considered to have a positive long-term influence on local transit. Therefore, the project would not conflict with applicable policies in City's General Plan related to transit, and impacts would be less than significant.

b. Less than Significant Impact

In December 2018, the Natural Resources Agency adopted amendments to the CEQA Guidelines, including the incorporation of SB 743 modifications. The Office of Planning and Research also published an update to its Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) to assist professional planners, land use officials, and CEQA practitioners. The Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743 that agencies and other entities may use at their discretion. The Technical Advisory recommends the use of VMT as the preferred CEQA transportation metric. To comply with the new legislation, the City has identified VMT analysis methodology, established VMT thresholds for CEQA transportation impacts, and identified possible mitigation strategies.

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 per 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.

The City's TIAG (City of Escondido 2021c) provides guidance on evaluating VMT and establishing efficiency metrics. 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 screening criteria would be presumed to have a less than significant VMT impact due to project characteristics and/or location.

As discussed in the VMT Review (see Appendix O), regional and project-specific VMT per capita was determined with maps prepared by SANDAG. The map information is derived from SANDAG's Activity Based Model (ABM) database, specifically the ABM2+ with the Series 14 growth forecast and represents the currently approved ABM version and 2021 SANDAG Regional Plan. The maps and associated data provide an estimate of personal vehicle travel by residents for each Traffic Analysis Zone (TAZ) within the region. According to the TAZ map, the project's estimated VMT per capita is

15.8. The VMT significance threshold is 15.05 VMT per capita (regional average VMT per capita is 17.7, with a 15 percent below-average threshold). Therefore, the project's VMT per capita is between 85 and 100 percent of the city-wide average, resulting in a significant impact.

To reduce significant impacts to VMT, the project would utilize the City's VMT Exchange Program, which provides a voluntary pathway for reducing VMT impacts through community-based transportation improvements. The following measures were developed in accordance with the process for selecting Early Action Exchange Program projects outlined in the VMT Exchange Program:

1. Install High Visibility Crosswalks at El Norte Parkway and Morning View Drive – Install high visibility crosswalks at four legs at the intersection of El Norte Parkway and Morning View Drive. The improvements would encourage short trips on foot, particularly to the local commercial retail area at this intersection, reducing local car trips. The crosswalks would also improve first- and last-mile connections to transit, further reducing VMT.

2. Install a High Visibility Crosswalk at North Broadway and Lincoln Avenue – Install a high visibility crosswalk on the west leg of the North Broadway and Lincoln Avenue intersection. This location is adjacent to Lincoln Elementary School and has been identified as a priority improvement through the Safe Routes to School program. The improvement will enhance the visibility of pedestrians, particularly school-aged children, and improve driver awareness at a critical crossing location. By providing a clearly marked and designated crossing, the improvement supports safer and more direct pedestrian access to Lincoln Elementary, encouraging more students to walk to school rather than be driven.

3. Install High Visibility Crosswalks at West Lincoln Avenue and North Escondido Boulevard – Install high visibility crosswalks at the West Lincoln Avenue and North Escondido Boulevard intersection. This location is adjacent to Lincoln Elementary School and has been identified as a priority improvement through the Safe Routes to School program.

4. Direct Pedestrian Access to Rod McLeod Park – Provide a pedestrian connection from the project site to the Rod McLeod Park access road. This connection will eliminate the need for a circuitous route around the block, offering residents a more direct and convenient path to the park. Improving pedestrian connectivity to local recreational amenities encourages walking by reducing travel distance and perceived effort. This enhancement will promote active transportation among residents, particularly children and families, who may otherwise rely on short vehicle trips to access the park. As a result, the direct pedestrian connection is expected to reduce local VMT, support public health, and foster a more walkable community. Due to existing grade differences and site constraints, the proposed connection is anticipated to be non-ADA compliant; however, it will still serve as a valuable route for able-bodied pedestrians and enhance overall connectivity between the residential area and community amenities.

As shown in Table 14, these measures would achieve a total VMT reduction of 185 VMT, which exceeds the City's target reduction of 169 VMT by 16 VMT.

Table 14 VMT Mitigation Measures				
VMT Exchange Program – Early Action Projects	Quantity	Unit VMT Reduction	VMT Reduction	Planning Level Construction Cost
Install High Visibility Crosswalks at El Norte Parkway and Morning View Drive	4 legs	15 per leg[1]	60	$10,000
Install a High Visibility Crosswalk at North Broadway and Lincoln Avenue	1 leg	15 per leg	15	$4,000
Install High Visibility Crosswalks at West Lincoln Avenue and North Escondido Boulevard	4 legs	15 per leg	60	$10,000
Direct Pedestrian Access to Rod McLeod Park	1 access point	50 per access point[2]	50	$70,000
		Total	**185**	**$94,000[3]**
		Target	169	
		Target Exceeded By	16	

VMT = vehicles miles traveled
[1]The VMT reduction for high visibility crosswalks per City guidance.
[2]The VMT reduction is estimated at a 50 VMT reduction per access point. Reduction takes into account the expansion of the pedestrian infrastructure and reduction in circuitous trips around the block. For reference, this reduction aligns with the VMT reduction associated with bus stop upgrades, per City guidance (i.e., 50 VMT reduction).
[3]Construction costs are preliminary and planning-level. The preparation and processing of design plans and permits are not required or assumed in the cost based on direction from the City.

As described in mitigation measure TRA-1, the project would be required to complete these measures prior to prior to planning final inspection of the sixth building. These measures have been approved by City staff and would offset the project's VMT impact. Therefore, implementation of mitigation measure TRA-1 would reduce VMT impacts to a less than significant level.

c. Less than Significant Impact

The project would not alter the existing circulation network, and changes would be limited to constructing a driveway connecting to West El Norte Parkway. Internal driveways would be 24 feet wide, which is consistent with the City's design standards and EFD requirements. Therefore, the project would not increase potential hazards associated with any new design feature or create an incompatible use, and impacts would be less than significant.

d. Less than Significant Impact

The project would not alter the existing circulation network, and changes would be limited to constructing a driveway connecting to West El Norte Parkway. Internal driveways would be 24 feet wide, which is consistent with the City's design standards and EFD requirements. Additionally, all construction activities would be required to comply with the City's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

Mitigation Measures

TRA-1: To reduce VMT impacts, the project applicant shall be required to complete the following pedestrian improvements prior to planning final inspection of the sixth building::

1. **Install High Visibility Crosswalks at El Norte Parkway and Morning View Drive** – Install high visibility crosswalks at four legs at the intersection of El Norte Parkway and Morning View Drive.
2. **Install a High Visibility Crosswalk at North Broadway and Lincoln Avenue** – Install a high visibility crosswalk on the west leg of the North Broadway and Lincoln Avenue intersection. This location is adjacent to Lincoln Elementary School and has been identified as a priority improvement through the Safe Routes to School program.
3. **Install High Visibility Crosswalks at West Lincoln Avenue and North Escondido Boulevard** – Install high visibility crosswalks at the West Lincoln Avenue and North Escondido Boulevard intersection. This location is adjacent to Lincoln Elementary School and has been identified as a priority improvement through the Safe Routes to School program.
4. **Direct Pedestrian Access to Rod McLeod Park** – Provide a pedestrian connection from the project site to the Rod McLeod Park access road.

4.18 Tribal Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☒	☐	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

EXPLANATIONS:

a.i and a.ii: Potentially Significant Unless Mitigation Incorporated

AB 52 establishes a formal consultation process between the lead agency, the City, and all California Native American tribes within the area regarding tribal cultural resource evaluation. AB 52 mandates that the lead agency must provide formal written notification to the designated contact of traditionally and culturally affiliated California Native American tribes that have previously requested notice. Native American tribes are notified early in the project review phase by written notification that includes a brief description of the proposed project, location, and the lead agency's contact information. The tribal contact then has 30 days to request project-specific consultation pursuant to this section (Public Resources Code Section 21080.1).

As a part of the consultation pursuant Public Resources Code Section 21080.3.1(b), both parties may suggest mitigation measures (Public Resources Code Section 21082.3) that can avoid or substantially lessen potential significant impacts to tribal cultural resources or provide alternatives that would avoid significant impacts to a tribal cultural resource. The California Native American tribe may request consultation on mitigation measures, alternatives to the proposed project, or significant effects. The consultation may also include discussion on the environmental review, the significance of tribal cultural resources, the significance of the proposed project's impact on the tribal cultural resources, project alternatives, or the measures planned to preserve or mitigate impacts on resources. Consultation shall end when either (1) both parties agree on the mitigation measures to avoid or mitigate significant effects on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

In accordance with AB 52, the City initiated consultation with Native American tribes that are traditionally and culturally affiliated with the geographic area of the project to identify resources of

cultural or spiritual value to the tribe. On January 27, 2025, the City sent consultation notification letters via email and certified mail to Native American Tribes on the City's main list pursuant to the requirements of AB 52 pertaining to government-to-government consultation. Table 15 summarizes the City's consultation efforts. To date, the City has conducted consultation with the Rincon Band of Luiseño Indians and the San Luis Rey Band of Mission Indians. As shown in Table 15, the additional three tribes included in the City's consultation efforts either declined consultation or did not respond. As of the date of this public review, consultation remains ongoing with the tribes that requested consultation.

Table 15
Tribal Consultation

Tribe	Individual Contacted	Date Letter Mailed	Response Received	Consultation Held
San Pasqual Band of Mission Indians	Angelina Guiterrez and Desiree Morales Whitman	January 27, 2025	DNR	N/A
San Luis Rey Band of Mission Indians	Cami Mojado	January 27, 2025	Accepted	May 1, 2025
Rincon Band of Luiseño Indians	Cheryl Madrigal	January 27, 2025	Accepted	March 6, 2025; March 25, 2025; April 1, 2025
Soboba Band of Luiseño Indians	Joseph Ontiveros	January 27, 2025	DNR	N/A
Mesa Grande Band of Mission Indians	Mario Morales	January 27, 2025	DNR	N/A

DNR = Did not respond; N/A = Consultation was not requested

As described in Section 4.5.a above, one new multicomponent resource, 10596-S-1 *(SCIC permanent number pending),* was identified within the project APE during the archaeological survey. Because this resource was recorded during the archaeological survey, an evaluation was undertaken in accordance with the requirements of the City to avoid significant impacts to cultural resources under CEQA. In order to determine if 10596-S-1 qualifies as a significant cultural resource, an evaluation excavation program was implemented. As discussed in the Archaeological Excavation Report (see Appendix G), RECON completed the evaluation excavation program by the excavation and recordation of a series of STPs. Due to the lack of artifact density and variety identified and documented through the archaeological methodologies and applied concepts, 10596-S-1 was recommended not a significant cultural resource under CEQA or City criteria.

Impacts to 10596-S-1 would not be significant because this resource has been recommended not eligible for listing on the CRHR or the City's local register. Because these impacts are not significant, no further treatment is needed; however, as a tribal cultural resource mitigation measure and if feasible, the bedrock milling features may be moved during construction and relocated to an open space, the location of which has not been determined.

Although impacts would not be significant, archaeological and Native American monitoring during construction is recommended to prevent significant impacts to inadvertent discoveries. Implementation of mitigation measures TCR-1 through TCR-8 would reduce potential impacts to inadvertent discoveries to a less than significant level.

Mitigation Measures

TCR-1: Prior to issuance of a grading permit, the Applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor(s) associated with a traditionally and culturally affiliated tribe(s) have been retained to implement a monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor(s). This verification shall be presented to the City in any contract execution, in a letter from the Project archaeologist that confirms the selected Native American monitor is associated with a traditionally and culturally affiliated tribe(s) as identified through the consultation process. The City, prior to any preconstruction meeting, shall approve all persons involved in the monitoring program.

TCR-2: The qualified archaeologist and a Native American monitor(s) shall attend all applicable preconstruction meetings with the general contractor and/or associated subcontractors to explain and coordinate the requirements of the monitoring program.

TCR-3: The project developer shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards, to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall be carried out by a cultural resource professional with expertise in archaeology, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. The training session shall include a handout and focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation if one is necessary. A qualified professional archaeologist shall be on-site along with a Native American monitor(s) during rough grading operations.

TCR-4 Prior to performing grading operations, the construction manager, tribal representative, grading contractor, the qualified archaeologist, and landowner/applicant if required, review the process for controlled grading of 10596-S-1, during the pre-construction meeting (see Mitigation Measure 2). The discussion shall include a review of the process, confirmation of what machinery shall be used, what types of resources are present and/or expected, what shall occur when/if buried resources are discovered, and who shall notify the monitors at least 48 hours in advance of when grading is anticipated to begin within 50 feet (15 meters) of 10596-S-1. Monitors shall be allowed to actively observe, including walking within a close but safe proximity to the equipment, the newly exposed soils for any evidence of buried resources. This process shall continue until the entire area has been completed. Upon the concurrence of both the project archaeologist and the tribal representative, controlled grading may cease and, if applicable, mass grading may proceed. The controlled grading process shall be documented by the project archaeologist in the Phase IV Monitoring Report as required in Mitigation Measure 7.

TCR-5: Prior to the start of grading, milling features identified by the Native American monitor, project archaeologist, and construction contractor that can be feasibly moved shall be flagged to protect it until relocation of the outcrops is scheduled. During construction monitoring by a Native American monitor and archaeologist, the area surrounding the feature(s) shall be excavated in a slow and controlled way in order to preserve as many milling elements as possible and to expose the entire outcrop. The outcrop shall be relocated to a location within the project area where the outcrop can be preserved in perpetuity. Due to potential construction constraints, the outcrop may need to be moved several times before being relocated to its permanent location. The location shall be agreed upon by the City and the traditionally and culturally affiliated tribe in consultation with the applicant. All efforts shall be made to preserve the outcrop as one piece, if feasible. If the boulder is too large to move in one piece, a concerted effort shall be made to preserve as many milling elements as possible.

TCR-6: In the event that archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 100 feet shall be established around the find where construction activities shall not be allowed to continue until a qualified archaeologist and the Native American monitor(s) have examined the newly discovered artifact(s) and have evaluated the area of the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Native American monitor(s) in coordination with the qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. Should the newly discovered artifacts be determined to be prehistoric, Native American tribes identified through project consultation, shall be contacted and consulted, and Native American construction monitoring shall continue. The project developer and the City in consultation with the affiliated consulting tribe(s) shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. No photography, invasive or non-invasive testing is permitted unless prior written approval of the affiliated tribes as identified throughout the consultation process.

All inadvertent discoveries are to be kept on the project site at a secured and locked location agreed upon by the traditionally and culturally affiliated tribe(s) and the City, until reburial on project site.

Reburial on Project Site: Prior to Notice of Completion for the Grading and Site Improvements, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

Prehistoric Resources – the following treatments shall be applied.

a. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future

impacts. Reburial shall not occur until all required cataloguing have been completed on the cultural resources, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial processes shall be culturally appropriate and consulted with the traditionally and culturally affiliated tribe(s), and the City. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to a Public Records Request.

b. Reburial of the resources off-site. If reburial is not feasible on-site as determined by the Director of Development services upon a recommendation provided by the archaeologist, in consultation with the TCA tribe(s), then reasonable efforts shall be made to locate the features off-site in consultation with the aforementioned parties.

TCR-7: Prior to release of the grading bond, the archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final Phase IV monitoring report at the conclusion of any on-site archaeological monitoring. The report shall be submitted to the project developer, the South Coastal Information Center, the City, the affiliated tribe(s) that participated in project consultation, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA, and treatment of the resources.

TCR-8: Qualified Native American monitor(s) shall be present during all on-site ground disturbance operations.

4.19 Utilities and Service Systems

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provided which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?	☐	☐	☒	☐

EXPLANATIONS:

a. Less than Significant Impact

Water

Water services would be provided by the Rincon Del Diablo Water District (District). The 2020 Urban Water Management Plan (UWMP) prepared by the District determined that adequate water supplies would be available to meet current and future water demand through 2045 (District 2020). As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized to forecast water supply demand in the District's UWMP. Consequently, the project would not require relocation or construction of new or expanded off-site water facilities.

The project would connect to the existing water line within West El Norte Parkway, including a connection to each townhome, all of which would be located within the project footprint. Consequently, potential impacts associated with construction of proposed on-site water facilities have been considered within this environmental document. Therefore, the project would not require

construction of off-site water facilities or expansion of existing facilities, and impacts would be less than significant.

Wastewater Treatment

Wastewater treatment services would be provided by the Hale Avenue Resource Recovery Facility (HARRF) operated by the City. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day (City of Escondido 2024). The average daily flow is 12.7 MGD, consisting of the City's flow of 9.7 MGD and the City of Rancho Bernardo's flow of 3.0 MGD. As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized to forecast wastewater demand for the HARRF operated by the City. Consequently, the project would not require relocation or construction of new or expanded off-site wastewater facilities.

The project would connect to the existing sewer line within West El Norte Parkway and include a sewer lateral connection to each townhome, all of which would be located within the project footprint. Consequently, potential impacts associated with construction of proposed on-site wastewater facilities have been considered within this environmental document. Therefore, the project would not require construction of off-site wastewater facilities or expansion of existing facilities, and impacts would be less than significant.

Stormwater Drainage

Stormwater facilities in the project vicinity are maintained by the City's Utilities Department. As discussed under Sections 4.10.c.i through 4.10.c.iv above, the project would reduce peak flows during the 100-year storm event from 17.27 cfs in the existing condition to 14.18 cfs in the mitigated post-project condition. The project would achieve this reduction in peak flows by introducing a biofiltration basin (BMP 1) to treat and detain runoff prior to discharging off-site. Consequently, the project would not require relocation or construction of new or expanded off-site stormwater facilities.

The proposed biofiltration basin would be located within the project footprint. Consequently, potential impacts associated with the construction of proposed on-site stormwater facilities have been considered within this environmental document. Therefore, the project would not require construction of off-site storm water drainage facilities or expansion of existing facilities, and impacts would be less than significant.

Electric Power, Natural Gas, and Telecommunications Facilities

Electricity and natural gas services to the project site are currently provided by SDG&E and telecommunication services are provided by AT&T. As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized to forecast demand for electric power, natural gas, and telecommunications. Consequently, the project would not require relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities.

The project would include an electrical, natural gas, and telecommunication connection for each townhome, all of which would be located within the project footprint. Consequently, potential

impacts associated with construction of proposed on-site facilities have been considered within this environmental document. Therefore, the project would not require construction of off-site electrical, natural gas, and telecommunication facilities or expansion of existing facilities, and impacts would be less than significant.

b. Less than Significant Impact

As discussed under Sections 4.19.a, the District would provide water services to the project site and can reliably meet current and future water demands through 2045.

As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized to forecast water supply demand in the District's UWMP. Therefore, sufficient water supplies would be available to serve the project, and impacts would be less than significant.

c. Less than Significant Impact

As described in section 4.19.a above, wastewater treatment services would be provided by the HARRF operated by the City, which is designed to treat wastewater flow of 18 million MGD, operating 24 hours a day (City of Escondido 2024). As described in Section 4.14.a above, the project would accommodate population growth that is already anticipated within the City, and therefore would be consistent with the growth assumptions utilized to forecast wastewater demand for the HARRF operated by the City. Consequently, sufficient capacity exists to accommodate the project. Therefore, the project would not exceed existing wastewater treatment capacity, and impacts would be less than significant.

d. Less than Significant Impact

Escondido Disposal, Inc. (EDI) provides waste and recycling services to the City. EDI conducts residential waste collection and takes the trash to the Escondido Resource Recovery transfer station, where trash is sorted into recyclable, organics, and refuse. EDI has an extensive program designed to recycle trash consistent with state regulations. AB 341, also called the "Mandatory Commercial Recycling Regulation," requires businesses and multi-family residential dwellings of five units or more, that generate four or more CY of commercial solid waste per week to implement recycling programs, on or after July 1, 2012. The California Integrated Waste Management Act of 1989 (AB 939) emphasizes resource conservation through reduction, recycling, and reuse of solid waste. Waste that cannot be disposed of would likely be deposited at the Miramar Landfill. Almost 910,000 tons of trash are disposed of yearly at the Miramar Landfill. The landfill spans over 1,500 acres and opened on December 7, 1959, and has since operated in three areas: north, south and west. The South Miramar Landfill operated from 1959 to 1973. The North Miramar Landfill operated from 1973 to 1983. The West Miramar Landfill, which is still in operation today, opened in 1983. According to the California Department of Resources Recycling and Recovery, the West Miramar Landfill has a remaining capacity of 11,080,871 tons and is expected to have capacity until January 1, 2031 (California Department of Resources Recycling and Recovery 2024).

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. Construction activities would be subject to

conformance with relevant federal, state, and local requirements related to solid waste disposal. As shown in Attachment 1 to Appendix A, operation of the project could potentially generate 51.7 tons of solid waste per year (280 pounds per day), which would be far below the 11,080,871-ton capacity expected for the West Miramar Landfill until January 1, 2031. Therefore, the project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, and impacts would be less than significant.

e. Less than Significant Impact

All collection, transportation, and disposal of solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50 percent of their solid waste generation into recycling. In addition, the state has set an ambitious goal of 75 percent recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill and AB 1826 is a mandatory organic recycling bill. The County of San Diego adopted its Integrated Waste Management Plan in 1998, which includes the Countywide Summary Plan, Source Reduction and Recycling Elements, and Non-Disposal Facility Elements for the county and each city in the county. Waste generated by the project would enter the City's waste stream but would not adversely affect the City's ability to meet the requirements of AB 939, AB 341, or AB 1826, since the project's waste generation would represent a nominal percentage of the waste created within the City. Therefore, the project would comply with all federal, state, and local management and reduction statutes and regulation related to solid waste, and impacts would be less than significant.

4.20 Wildfire

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

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

EXPLANATIONS:

a. Less than Significant Impact

The City's General Plan Community Protection Element identifies emergency evacuation routes in Figure VI-1 (City of Escondido 2012b). As depicted in Figure VI-1, West El Norte Parkway is identified as an evacuation route leading to I-15. The project would not alter the existing circulation network, and changes would be limited to constructing a driveway connecting to West El Norte Parkway. Internal driveways would be 24 feet wide, which is consistent with the City's design standards and Fire Department requirements. Additionally, all construction activities would be required to comply with the City's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the project would not interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b, c, and d. Less than Significant Impact

Review of the CAL FIRE FHSZ maps and data determined that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE2025). Furthermore, the project site is located within an urbanized portion of the City away from any urban/wildland interface. Rod McLeod Park to the north and vacant land owned by SDG&E are sparsely vegetated and do not possess fuels that could exacerbate the spread of fire. Therefore, the project would not exacerbate fire risk or expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

4.21 Mandatory Findings of Significance

Does the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	☐	☒	☐	☐
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

EXPLANATIONS:

a. Potentially Significant Unless Mitigation Incorporated

The project has the potential to result in significant impacts to biological resources, cultural resources, noise, transportation, and tribal cultural resources as discussed in Sections 4.4, 4.5, 4.13, 4.17 and 4.18. Implementation of mitigation measure BIO-1 would reduce direct impacts to disturbed Diegan coastal sage scrub, mitigation measures TCR-1, -2, -3, -6, and -7 would reduce impacts to

inadvertent discoveries of culturally significant resources, mitigation measure NOS-1 would reduce impacts from blasting, mitigation measure TRA-1 would reduce VMT impacts, and mitigations measures TCR-1 through TCR-8 would reduce impacts to tribal cultural resources. Therefore, the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory, and impacts would be less than significant.

b. Potentially Significant Unless Mitigation Incorporated

Cumulative impacts require consideration of development that may be occurring in the localized area to determine whether the project, in combination with other development, would significantly contribute to a cumulative impact. The Transportation LMA (see Appendix B) analyzed six approved or pending cumulative projects within the study area as shown in Table 16.

Table 16
Cumulative Projects

Project Name	Description
Nutmeg South	The project consists of 7.66 acres of residential development, located on a vacant site along the east side of Interstate 15, east of North Centre City Parkway and north and south of North Nutmeg Street, proposing up to 137 multi-family dwelling units.
N Iris Condominiums	The project consists of 7.7 acres of multi-family residential development, located on the southwest corner of North Iris Lane at Robin Hill Lane, proposing up to 102 dwelling units.
Conway Subdivision	The project consists of single-family and multi-family residential development, located on the southwest corner of the Conway Drive and Stanley Avenue, proposing up to 54 dwelling units.
Ash Subdivision	The project proposes 20 single-family units to be built on the northwest corner of Ash Street and Lehner Avenue.
Jehovah Witness Assembly Hall SPA 13 GPA	A GPA to modify SPA 13 to allow the development of an approximate 21,892-squarefoot assembly hall, located at 521 Imperial Drive.
Residential SPA 13 GPA	A GPA to modify the residential area overlay of SPA 13 to allow residential development up to 30 dwelling units per acre, located on the northwest corner of West El Norte Parkway and South Iris Lane.
GPA = General Plan Amendment; SPA = Specific Plan Area	

Cumulative intersection operations modeled were determined to operate at acceptable operations (i.e., LOS C or better) and no deficiencies were identified under all conditions. In addition, cumulative roadway segment operations modeled were determined to operate at acceptable operations (i.e., LOS C or better) and no deficiencies were identified under all conditions.

As discussed in Section 4.3 Air Quality, impacts related to air quality would be less than significant. Air quality is a regional issue and the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as a non-attainment area. As described under Section 4.3.b, the project

would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS and cumulative impacts would be less than significant. In addition, the analysis of GHG emissions in Section 4.8 is a cumulative analysis by nature as the issue of GHG emissions is a global issue. As detailed therein, the project would not contribute to a cumulatively considerable impact to the global cumulative GHG emissions impact.

As discussed in Section 4.4 Biological Resources, the project would result in impacts to disturbed Diegan coastal sage scrub. While the City of is no longer an enrolled entity within a Natural Community Conservation Plan program, regional land conservation and mitigation ratios continue to be drawn from established norms for implementation or regional conservation strategies. Therefore, off-site mitigation outlined in mitigation measure BIO-1 would be focused on the purchase of available credits from an approved mitigation bank within the north San Diego County region that contributes to strategic conservation goals. Implementation of mitigation measure BIO-1 would reduce cumulatively considerable impacts to Diegan coastal sage scrub to a less than significant level.

Furthermore, as described in this IS/MND, all other potential impacts would be mitigated to a level less than significant. Therefore, the project would not result in any project-level significant impacts that could contribute to an existing cumulative impact on the environment.

c. Less than Significant Impact

The project would be required to adhere to all applicable codes and regulations. As described in Sections 4.1 through 4.20, the project would not result in any substantial adverse direct or indirect impacts to human beings. Therefore, direct or indirect impacts on humans resulting from the project would be less than significant.

5.0 Determination and Preparers

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE FEE DETERMINATION

(Fish and Game Code Section 711.4, Statutes of 2006 – SB 1535)

[ ] It is hereby found that this project involves no potential for any adverse effect, either individual or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this project.

[X] It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore, fees in accordance with Section 711.4(d) of the Fish and Game Code shall be paid to the County Clerk.

Report Preparers

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APPENDICES

Under Separate Cover