

California Environmental Quality Act

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

El Caballo Park Master Plan Project
Escondido, CA

April 2026

Lead Agency:

City of Escondido
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1.0 INTRODUCTION

1.1 Introduction and Regulatory Guidance

This document is an Initial Study (IS) with supporting environmental studies that provide justification for a Mitigated Negative Declaration (MND), pursuant to the California Environmental Quality Act (CEQA), for the El Caballo Park Master Plan Project (Project).

The IS/MND is a public document to be used by the City of Escondido (City), as the lead agency, to determine whether the Project may have a significant effect on the environment pursuant to CEQA. If the lead agency finds substantial evidence that any aspect of the Project, either individually or cumulatively, may have a significant effect on the environment that cannot be mitigated, regardless of whether the overall effect of the Project is adverse or beneficial, the lead agency is required to prepare an environmental impact report (EIR), use a previously prepared EIR and supplement that EIR, or prepare a subsequent EIR to analyze the Project at hand (Public Resources Code Sections [PRC] 21080[d] and 21082.2[d]).

If the agency finds no substantial evidence that the Project or any of its aspects may cause a significant impact on the environment with mitigation, an MND shall be prepared with a written statement describing the reasons why the proposed Project, which is not exempt from CEQA, would not have a significant effect on the environment and therefore why it does not require the preparation of an EIR (CEQA Guidelines Section 15371).

According to CEQA Guidelines Section 15070, a Negative Declaration shall be prepared for a project subject to CEQA when either:

- 1) *The IS shows there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- 2) *The initial study identifies potentially significant effects, but:*
 - a) *Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
 - b) *There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.*

This IS/MND has been prepared in accordance with CEQA, PRC Section 21000 et seq., and the CEQA Guidelines Title 14 California Code of Regulations (CCR) Section 15000 et seq.

1.2 Lead Agency

The lead agency is the public agency with primary responsibility over a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines Section 15051 provides criteria for identifying the lead agency. In accordance with CEQA Guidelines Section

15051(b)(1), “the lead agency will normally be the agency with general governmental powers.” Based on the criteria described above, the lead agency for the proposed Project is the City of Escondido.

1.3 Purpose and Document Organization

The purpose of this IS/MND is to evaluate the potential environmental impacts of the proposed El Caballo Park Master Plan Project. Mitigation measures have been established that reduce or eliminate any identified significant and/or potentially significant impacts. This document is presented in the following format:

1.0 Introduction

This section provides an introduction and describes the purpose and organization of this document.

2.0 Project Description

This section provides a detailed description of the proposed Project and the environmental setting, and it lists the various agency approvals required.

3.0 Environmental Checklist

This section describes the environmental setting for each of the environmental subject areas, as appropriate; evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” or “potentially significant impact” in response to the environmental checklist; provides mitigation measures, where appropriate, to mitigate potentially significant impacts to a less than significant level; and provides a determination of Project impacts.

4.0 Document Preparers and References

This section identifies staff and consultants responsible for preparation of this document. It also lists the resources used in the preparation of this document.

Appendices

The appendices to this report include various technical reports and modeling printouts that were prepared during the course of the Initial Study.

2.0 PROJECT DESCRIPTION

2.1 Project Characteristics

1. Project Title

El Caballo Park Master Plan Project

2. Lead Agency Name and Address

City of Escondido
201 North Broadway
Escondido, CA 92025

3. Contact Person

Sally Schiffman, Principal Planner
City of Escondido
Development Services Department
Direct: 760-839-4514
Email: Sally.Schiffman@escondido.gov

4. Project Location

El Caballo Park is located in the northeastern portion of the City of Escondido in northwestern San Diego County, California. Regional access to the city is provided via Interstate 15 (I-15) from the north/south and State Route 78 (SR 78) from the east/west. Local access is provided via East Valley Parkway. The existing park is accessed via SR 78, north along Bear Valley Parkway/East Valley Parkway, west along Beven Drive, then north along Save A Life Way. The Project site includes portions of Assessor Parcel Numbers (APNs) 760-246-1700 and 760-246-3300.

5. Project Sponsor's Name and Address

City of Escondido; 201 N. Broadway; Escondido, CA 92025

6. Existing General Plan Land Use Designation

SPA 5 (Northeast Gateway SPA #5)

7. Existing Zoning

S-P (Specific Plan Area)

2.2 Existing Conditions

Regional Setting

El Caballo Park is located in the northeastern portion of the City of Escondido in northwestern San Diego County, California; refer to Figure 2-1, *Regional Vicinity Map*. Regional access to the City is provided via I-15 from the north/south and SR 78 from the east/west. The City is generally surrounded by unincorporated San Diego County lands, with the communities of Valley Center to the north/northeast; Del Dios to the southwest; and Hidden Meadows and Twin Oaks to the north/northwest. The City of San Marcos lies to the west.

Various natural resources surround the city, including the Mountain Meadow County Preserve to the north, Daley Ranch Park Preserve, Dixon Lake, and Lake Wohlford Park to the northeast, Bottle Peak County Preserve to the east, Lake Hodges to the south, and Elfin Forest Recreational Reserve to the west. Southeast of the City lie the San Diego Zoo Safari Park, San Pasqual Valley, and the Ramona Grasslands County Preserve.

Local Setting

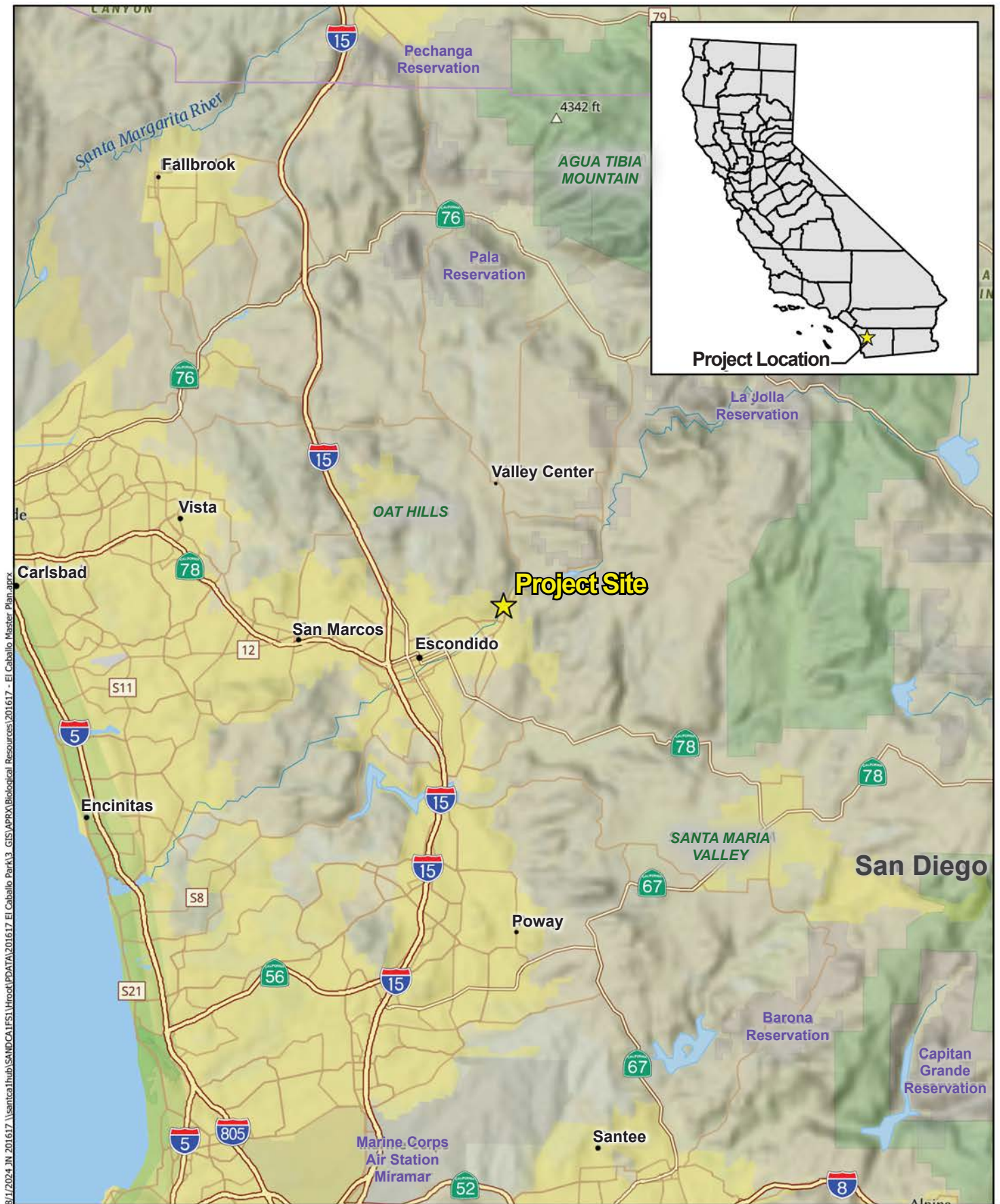
El Caballo Park is located in the northeastern portion of Escondido, with direct access provided via Save A Life Way. The Project site includes portions of APNs 760-246-1700 and 760-246-3300. Refer to Figure 2-2, *Local Vicinity Map*. Under current conditions, the park supports a number of equestrian facilities used to host equestrian shows, cultural activities, and horse training; refer to Figure 2-3, *Existing Conditions*, and Figure 2-4, *Site Photographs*.

The Project site currently supports an arena with a small set of bleachers at the eastern end. A make-shift amphitheater cut into the adjacent slope also provides seating on the south end of the arena. Several level-graded pads are present, along with a portable restroom. Other existing on-site elements include park signage, varying fencing and stone walls, pathways, a water spigot, and a paved driveway to the neighboring San Diego Humane Society. A number of existing pedestrian, bicycle, and equestrian paths are present in the area (i.e., along local roadways and in Daley Ranch).

Visitor parking for El Caballo Park is currently provided via a dirt surface lot located just west of Save A Life Way. Parking for horse trailers is similarly provided via a dirt surface lot along the east side of Save A Life Way. Surface parking for the Hidden Valley Obedience Club and Mayflower Dog Park is provided along Wohlford Drive, as well as at the large vacant dirt lot adjacent to the south of the obedience club; refer to Figure 2-3, *Existing Conditions*.

The Escondido Creek concrete channel traverses the park, just west of Mayflower Dog Park and Hidden Valley Obedience Club. A 2-foot-wide concrete-lined creek tributary channel also traverses the park from the northwestern boundary, trending east/southeast, and ultimately connecting to the Escondido Creek channel; refer to Figure 2-3, *Existing Conditions*.

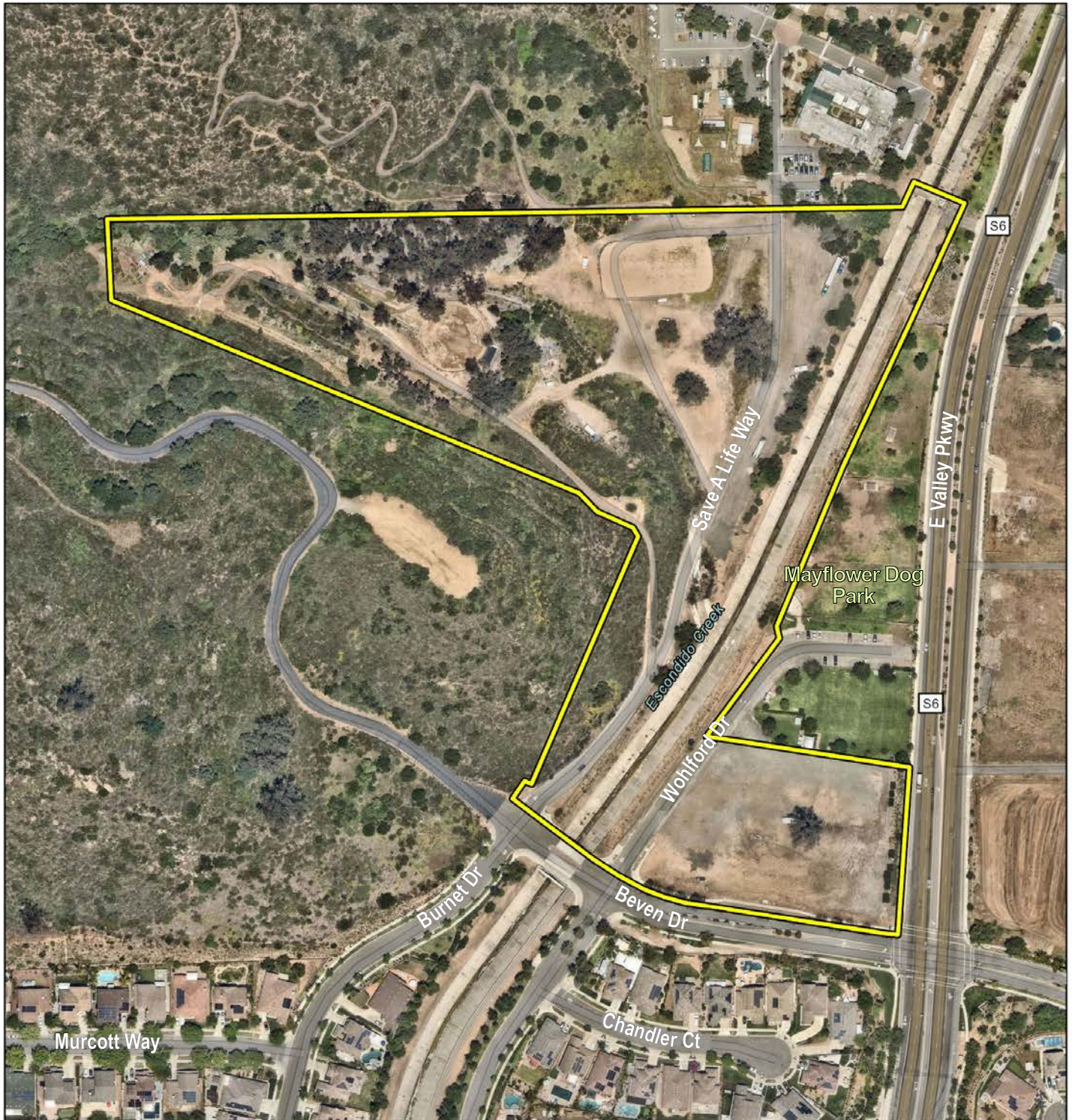
On-site vegetation largely consists of Diegan coastal sage scrub; disturbed habitat; and eucalyptus woodland. Other on-site habitat includes southern willow scrub; mule fat scrub; Diegan coastal sage scrub; non-native grassland; non-native vegetation; and developed lands.



CITY OF ESCONDIDO
EL CABALLO PARK MASTER PLAN
Regional Vicinity Map

Figure 2-1

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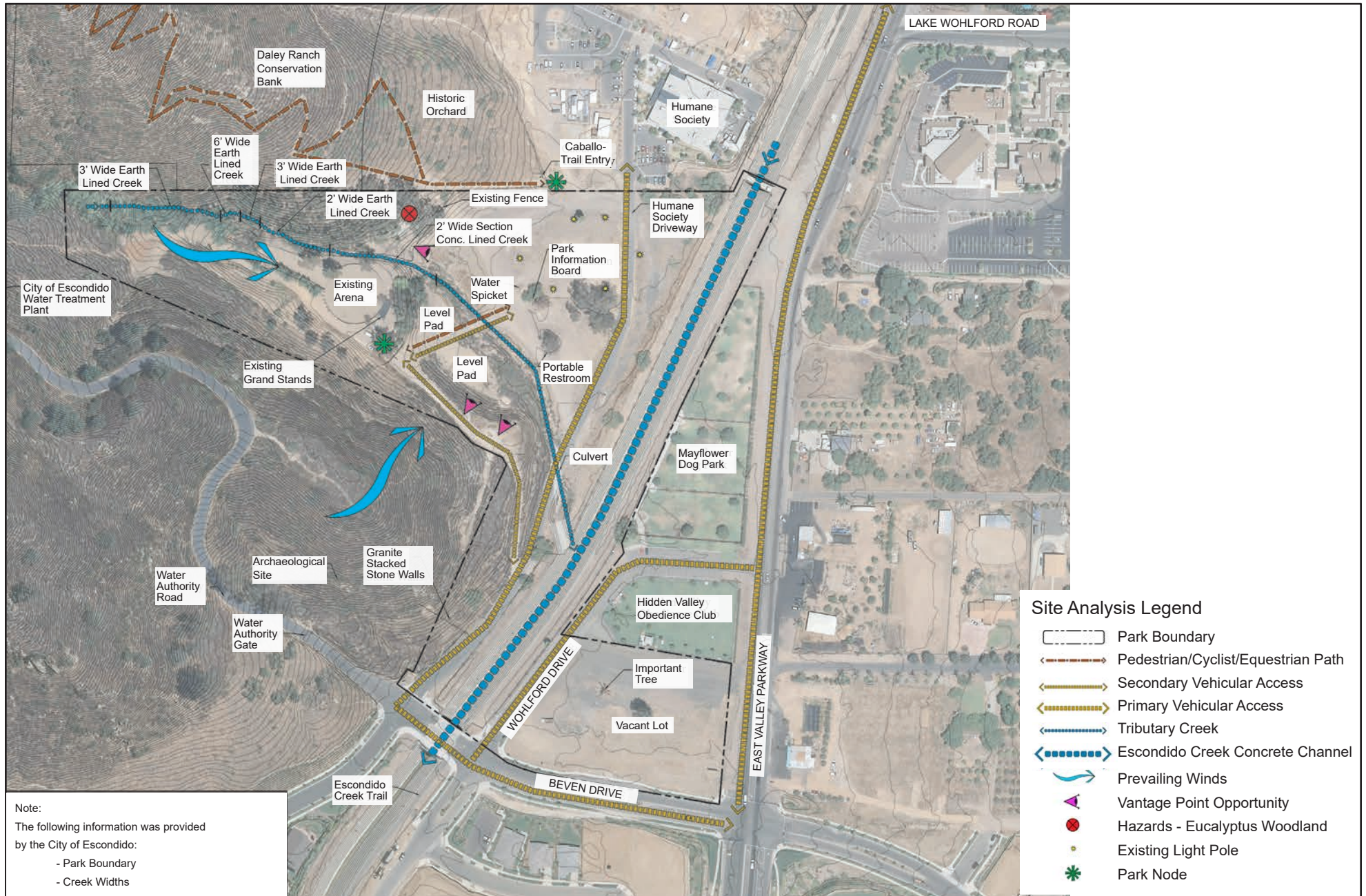


Legend

 El Caballo Park Project Area



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Photo 1: View looking east across existing El Caballo Park parking area.



Photo 2: View looking east along the north edge of El Caballo Park.



Photo 3: View of cement stage across from keyhole arena.



Photo 4: West end of El Caballo Park, looking east.



Photo 5: View looking northeast across El Caballo Park.



Photo 6: View looking northwest across dirt lot northwest of Valley Parkway/Beven Drive towards El Caballo Park.

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Surrounding Land Uses

El Caballo Park is bounded to the north and northwest by the Daley Ranch Preserve, an approximately 3,000-acre open space preserve that is available to the public for recreational purposes. An existing trailhead connection (Caballo Trail) leads from El Caballo Park into Daley Ranch and is available to hikers, mountain bikers, and equestrians.

The San Diego Humane Society is located to the north and is accessed through El Caballo Park. Mayflower Dog Park is to the east and the Hidden Valley Obedience Club, a private dog obedience club, is to the southeast. Both are separated from El Caballo Park by Escondido Creek. An approximately 2.5-acre vacant dirt lot (included in the El Caballo Park Master Plan boundary) is located between the Hidden Valley Obedience Club and Beven Drive to the south. Additionally, the Eureka Springs 340-unit residential development lies south of the park, to the east and west of East Valley Parkway. To the west of the park is the City of Escondido Water Treatment Plant, with Dixon Lake immediately beyond.

2.3 Existing Conditions/Uses

For over half of a century, the land comprising the upper portion of El Caballo Park has been utilized by the Charros of Escondido (Asociación de Charros de Escondido) to conduct charreadas¹ (similar to rodeos) and choreographed horse shows by young women called Escaramuzas.² The charreadas continue a Mexican tradition of demonstrating skills necessary to run cattle ranches.

The Charros of Escondido constructed the existing on-site charreada arena with supporting small corrals for horses and cattle used in the charreada events. This group is one of the oldest Charros groups in California and competes with teams from California and Mexico. Practices are held throughout the week leading up to a Sunday event. The competitions follow strict guidelines outlined by the Federación Mexicana de Charrería as well as animal rights regulations enforced by the United States.

During the week, the park may be used by a variety of visitors, but attendance at the park on a given weekday (Monday through Friday) is estimated to range between 75 and 100 people per day, including those using the existing equestrian facilities. The Project site includes portions of Mayflower Dog Park. Use of Mayflower Dog Park also varies, with weekday evenings and weekends being times of higher visitor use. It is estimated that approximately 50 to 60 users visit the dog park on a given weekday, with 75 to 100 users on a typical Saturday or Sunday.

Although varied, attendance at a typical event held on Sundays ranges from an estimated 50 to 300 spectators, with 25 to 30 active participants in the equestrian events and shows. On Saturdays, it is estimated that 20 to 25 Charros members attend weekly practice sessions.

1 Charreadas are Mexico's national sport and are similar to rodeos, involving costumes and music, preserving the heritage of such events. The charreadas feature nine men's events and one women's event (escaramuza) and represent a Mexican cultural tradition of demonstrating skills associated with cattle ranch operations, including equestrian skills, horse taming, roping, and livestock handling by the charro (Mexican cowboy).

2 Escaramuzas events involve teams of young women wearing colorful dresses, riding sidesaddle at high rates of speed in choreographed routines (City of Escondido 2014).

According to City records, users of Caballo Trail (off-site in Daley Ranch; not part of the proposed Project) were as follows: in the year 2021, an estimated 5,445 mountain bikers and 3,883 hikers (9,328 total users); in the year 2022, an estimated 5,674 bikers and 4,174 hikers (9,848 total users); and in the year 2023, an estimated 9,940 bikers and 6,161 hikers (16,101 total, or an average of 44 users per day) (City of Escondido 2024). As such, trail use for bikers and hikers has varied from year to year and has nearly doubled over the past several years. Equestrian use of El Caballo Trail is estimated at 5,400 riders per year (approximately 15 per day).

2.4 Proposed Project

The El Caballo Park Master Plan is intended to provide a framework for future improvements to existing El Caballo Park, an empty lot north of Beven Drive, and an area adjacent Mayflower Dog Park. It is envisioned that the park would serve as a public facility that accommodates equestrian-oriented activities with other amenities designed for a range of visitors. The Project is intended to provide recreational facilities that would attract a mix of users such as the Charros Association, horse riders, dog lovers, therapeutic equestrian groups, local residents and visitors, businesses, educational institutions, and charitable organizations.

The proposed park improvements would ultimately provide a central, open, passive recreational lawn area surrounded by a variety of natural play opportunities, picnic groves, an equestrian center, and a pedestrian path linking Mayflower Dog Park with El Caballo Park to facilitate improved access and create one cohesive park. Additionally, the Project would naturalize Escondido Creek within the park boundary, providing improvements to change the channel from a concrete channel to vegetated channel.

2.5 Purpose of the Park Master Plan

The purpose of the El Caballo Park Master Plan is to:

- Develop a detailed Master Plan to provide a coordinated and strategic approach to the provision and development of equestrian activities and infrastructure;
- Guide the layout of active and passive recreation, facilities, amenities, parking requirements, and general park needs;
- Assess potential development funding opportunities and phasing strategies;
- Ensure the use of the space is maximized and that natural elements are retained and enhanced wherever possible; and,
- Provide “natural” play opportunities that will encourage creativity and learning, free of typical play structures that limit creative thinking.

Project Components

The proposed improvements to be implemented with the Master Plan are described below and listed in Table 2-1, *Proposed Improvements*. Refer also to Figure 2-5, *Proposed Master Plan*, which illustrates their locations.

Table 2-1: Proposed Improvements

Area	Proposed Improvements		
Arena Area	- Improved Fencing/Gates - New Bleachers - New Seating on Slope - Ticket Booth and Restrooms - Accessible Path from Parking Area - Citrus Grove (to reflect historic use) - Replace Existing Eucalyptus Trees (to be removed per phasing plan and replaced with native trees)	- Shade Trees - Announcers Stage - Bandstand 16'-wide Bridge with Decomposed Granite Paving - Pedestrian Bridge - New 12'x 12' Corrals (8) - Muck Storage - Trash Enclosure - Wash Racks (2)	- Bull Corrals - Round Pen - Vehicular Turn-Around - Emergency Vehicular Hammerhead - Equestrian Entry Path - Shade Structure - Barbecue, Picnic, and Dance Area - Changing Room - Expanded Vehicular Access 4-Rail Fencing
Lower Equestrian Area	- Community Hall Building (includes 40' x 40' multiuse space, restrooms, office space, kitchen/concessions space, wraparound porch and 2nd floor caretakers apartment) 100' x 200' Arena 55' Round Pen (2) 45' Round Pen 20' x 24' Corrals (2)	12'x 12' Corrals (14) - Bleachers - Amphitheater Seating - Therapeutic Arena - Wash Racks - Mounded Lawn Area - Lawn Area Surrounded by Paved Walkway - Shade Structures - Nature Exploration Area	- Public Art Opportunity - Tributary Creek Improved with Native Planting - Staging Area at Caballo Trailhead - Fencing - Standard Vehicular Parking - Accessible Parking Stalls 24' Two-Way Improved Access Road
Horse Trailer Parking Area	- Maintenance Building - Disabled Parking Stalls - Trailer Parking (18' x 60' minimum with decomposed granite surface) (15) - Emergency Drive Through and Turn-Around Loop - Entry Monument #4	- Maintenance Crew Parking - Pedestrian Access to Existing Pedestrian Bridge - Escondido Creek Channel - Escondido Creek Trail Extension - Fencing	- City Entry Monument #1 - Muck Storage — Covered - Trash Enclosure - Gate for Future Expansion of Road - Bicycle Rack - Staging Area for Daley Ranch
Lower Multiuse Parking Area	- Park Entry Monument Sign #2 - New Decomposed Granite Pathway with Benches - Decomposed Granite Parking Lot - Trailer and Motorhome Parking (28' x 75' spaces) (6) 16' Wide Bridge with Decomposed Granite Paving	- Log Tire Stops from Eucalyptus Trees On-site - Fencing - GrassPave2 Parking Spaces to Expand the "Park" Experience - Shade Trees - Escondido Creek Trail Extension	- Bicycle Rack - Picnic Table - Decomposed Granite Pathway - Concrete Pathway - Drinking Fountain
Mayflower Dog Park – El Caballo Park Connection	- Dog Park Connection Node - Public Art - Restrooms	- Escondido Creek Channel - New Pedestrian Bridge	- Trailer Parking - Bicycle Rack - Drinking Fountain

¹ Grasspave2 is a porous paving product made from recycled plastic. It allows for vehicular and pedestrian traffic without causing grass compaction or damage.

The design of the park elements and the materials used are intended to establish the overall character of the park. All elements would reflect a Mexican/western ranch theme and would be designed to be simply constructed, installed, and maintained. The architectural style and use of colors and materials; fencing; lighting; signage; furniture; and landscaping would also be aimed at integrating the park with Mayflower Dog Park, Escondido Creek Trail, and Caballo Trail to establish a comprehensive design theme that unifies these recreational facilities.

Arena Area Improvements

Proposed improvements at the arena are intended to upgrade the facilities from their existing condition to make the arena more suitable for animals and rider events. The arena would be enhanced with the addition of better railings, solid siding, and improved corrals for the temporary holding of livestock. New corrals, multiple round pens and arenas, muck storage (for temporary storage of animal waste), two wash racks, and other equestrian features are proposed. For safety purposes, pedestrians and horses would be separated, whereby horses would enter the arena area from the north using a dedicated trail fenced off from the event picnic area to the east of the entry trail; refer to Figure 2-5.

Improvements would also include installation of a bandstand and an announcer's stage adjacent to the arena in support of public events. New bleacher seating would be constructed at the east end of the arena, and new seating would be provided along the slope to the south of the arena. Other supporting features would include a ticket booth, restrooms, and a changing room.

Other public areas for active and passive recreation would be provided in the form of barbecue and picnic areas, as well as areas for dancing in the north central area of the park, between the existing arena and the lower equestrian area. Grass play areas with shaded picnic spaces, a community hall building, nature exploration opportunities, and an improved parking layout are also planned (see details in Lower Equestrian Area Improvements below).

Access and circulation improvements would include expanded vehicular access, a vehicular turn-around, and an emergency vehicular hammerhead. A 16-foot-wide equestrian bridge with decomposed granite surfacing is proposed to allow crossing of the on-site tributary to Escondido Creek; a pedestrian crossing is proposed just to the east. An equestrian entry path is proposed in the northeastern portion of this area, along the northern property boundary, to allow users from El Caballo Park to access the existing trails offered in Daley Ranch.

Existing non-native eucalyptus trees in the northwestern portion of the park would be replaced with native trees within the same area. A citrus grove is also proposed along the southern portion of the existing arena area to reflect historical uses in the area. Other proposed enhancements in the area include landscaping and fencing.



Master Plan Features Legend

1. Improved Existing Arena
2. Lower Equestrian Area Development
3. Connection to Caballo Trail and Dailey Ranch
4. Therapeutic Riding Arena
5. Common Gathering and Picnic Areas
6. Tributary Creek
7. Horse Trailer Parking
8. Overflow Parking
9. Improved Escondido Creek
10. Connection to Escondido Creek Trail
11. Mayflower Dog Park
12. Hidden Valley Obedience Club
13. Therapeutic Riding Trail
14. Monument Sign 1
15. Monument Sign 2
16. Monument Sign 3
17. Monument Sign 4



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Lower Equestrian Area Improvements

The lower area would serve as the “heart” of El Caballo Park, based on its central location near the majority of the park’s amenities. Key elements of the Lower Equestrian Area would include multiple round pens and arenas, including a 100- by 200-foot show arena and a therapeutic riding arena. The Master Plan concept focuses on the positive impact that these improvements would make on the park’s community, in particular, therapeutic equestrian groups that may utilize the arena. The therapeutic riding arena would be constructed with flexible railings for safety. Other equestrian elements proposed for this area include two 55-foot diameter portable round pens; a 45-foot diameter round pen; two 20- by 24-foot corrals and multiple 12- by 12-foot corrals for a variety of purposes; new bleacher seating; and amphitheater seating.

A new 40- by 40-foot community hall building is also proposed for this area and would include multiuse space, restrooms, office space, and kitchen/concessions space. The building would feature a wraparound porch and a second-floor caretaker’s apartment to house an on-site, full-time maintenance worker.

The area north along Save A Life Way would provide opportunities for active and passive recreation. The perimeter of a round lawn area would support three shaded, four horse corrals for visitors arriving by horse, and a landscaped area to the west that will provide opportunities to learn about the environment and history of the area. Another lawn area is proposed to the north of the circular lawn area that would allow for closer views of many of the park’s activities, with several arenas within close proximity. Recreational outdoor activities may occur within the shaded picnic areas, lawn areas, or near the large arena, along with public art showcases and educational opportunities at the lower equestrian area during public events. The lawn areas would be served by a series of sidewalks to provide access to the various amenities.

A proposed staging area, with connection to the Caballo Trail trailhead and Daley Ranch, would also be provided along the northern property boundary. The staging area would be within proximity to other equestrian-related facilities (i.e., hitching posts, picnic tables, corrals, and shade structures), thereby creating opportunities for people to gather. The staging area would also provide an opportunity for non-equestrians (i.e., hikers) to interact with horses and converse with riders.

Horse Trailer Parking Area Improvements

As part of the Master Plan, surface parking would be expanded to support large equestrian events that may require accommodation of horse trailer parking. The Horse Trailer Parking Area would provide 15 trailer spaces, each 18 by 60 feet minimum, surfaced with decomposed granite. A hitching post would be provided at each space. It is anticipated that the trailer parking space proposed could potentially accommodate 15 to 72 horses, depending on the number of horses carried in each trailer. A trash enclosure, maintenance building, and covered muck storage area, along with parking for maintenance staff, are also proposed in the northern portion of the horse trailer parking area. Parking for accessible and standard vehicles would be provided on the west side of existing Save A Life Way.

A new gate would be constructed at the entrance to the Escondido Humane Society to control traffic if, in the future, a new access road is constructed at the intersection of Lake Wohlford Road and East Valley Parkway; however, such road improvements are not considered part of the proposed Project analyzed in the IS/MND.

Lower Multiuse Parking Area Improvements

The Lower Multiuse Parking Area is located at the northeast corner of Beven Road and Wohlford Drive. This parking area would accommodate the overflow of vehicles from large events occurring in the park, and would include six, 28- by 75-foot trailer/motor home parking stalls. Additionally, the area would provide standard vehicle parking spaces for the Hidden Valley Obedience Club. The lot would be surfaced with decomposed granite to allow for stormwater infiltration.

Equestrian, pedestrian, and bicycle access to the main park would be provided by a new rustic bridge that would span the Escondido Creek channel (“Escondido Creek Bridge”) and would be located immediately north of the existing vehicular bridge and west of Wohlford Drive.

A park entry monument sign would identify the park and other amenities found in the area. Various pedestrian paths are proposed, including an enhanced trail along Escondido Creek, with benches provided along the routes. New landscaping would enhance visual interest, as well as providing water quality treatment. Additionally, bicycle racks, picnic tables, shade trees, and a drinking fountain are proposed to be installed for this area to provide opportunities for rest and hydration for pedestrians and bicyclists.

Mayflower Dog Park/El Caballo Park Connection

The Master Plan proposes improvements to connect Mayflower Dog Park with El Caballo Park to enhance the sense of community and use of the park by local residents and visitors to the area. Under current conditions, the concrete channel of Escondido Creek physically divides the two park spaces, making it difficult to move from one facility to the other. The Master Plan proposes construction of a rustic pedestrian bridge across the creek to link the two uses, with an entry point strategically located at the southwest end of Mayflower Dog Park with a direct view and path to El Caballo Park. The Lower Multiuse Parking Area would be immediately adjacent to this park entry, which would further encourage and support convenient use of both parks. The Master Plan also proposes construction of a public restroom at the dog park, along with bicycle racks and a drinking fountain.

On-site Creek Enhancements

Improved Escondido Creek

Escondido Creek borders El Caballo Park as a concrete channel along its eastern boundary. The Project proposes to return this segment of the creek to a more natural state by removing the concrete sides and a portion of the concrete bottom and replacing the paved channel with appropriate native vegetation. Enhancements to the creek channel are intended to create a stronger visual and physical connection between Mayflower Dog Park and El Caballo Park and encourage a more natural solution to addressing stormwater drainage; refer also to additional discussion under *Utilities*, below. An 8-foot-wide concrete path is proposed adjacent to the creek channel to facilitate pedestrian movement and provide ongoing access for maintenance.

Tributary Creek

An existing tributary creek channel traverses the park from the northwest end to the southern end with connection to the Escondido Creek channel. Proposed improvements to the tributary creek include minor grading to improve the creek edges at the lower end; revegetation of native plants; and removal of existing concrete sides to be replaced with softened edges and vegetation.

Access/Circulation

Access to the Project site would be provided off of East Valley Parkway to Beven Drive, then north along Save A Life Way; refer to Figure 2-5, *Proposed Master Plan*. Several on-site drives would provide access to the proposed surface parking lots and other parking areas for access and maintenance purposes.

The Project includes a proposed emergency drive-through and turn-around loop from the northern end of Save A Life Way and adjacent to Escondido Creek and the proposed equestrian trailer parking area; refer to Figure 2-5, *Proposed Master Plan*. An emergency vehicular hammerhead is also proposed in the northwestern portion of the site between the therapeutic riding arena and the improved existing arena to allow for additional emergency vehicle access. The Master Plan is aimed at providing easier accessibility to El Caballo Park, Mayflower Dog Park, Daley Ranch, and other off-site areas; refer also to *Trails*, below. Various on-site pedestrian, bicycle, and equestrian pathways are proposed to enhance access to the main park and between park uses.

As stated, the Project proposes enhanced connections to the existing Caballo Trailhead in Daley Ranch. In particular, equestrians arriving by trailer would have improved ease of access to the new entry area north of the 100- by 200-foot arena, reinforced by the proposed supporting equestrian facilities at the park.

Trails

Connection to Caballo Trail and Daley Ranch

As noted, adjacent to the north of the Project site is the Daley Ranch Preserve, which offers over 3,000 acres of recreational and preserved open space lands, with more than 25 miles of trails available for equestrians, pedestrians, and cyclists. The Project proposes improvements to provide connection to the Caballo Trail trailhead in Daley Ranch to enhance ease of access and safety for visitor entry to the trail. A staging area is also proposed near the trailhead, located within proximity to other on-site equestrian-related facilities (i.e., hitching posts, picnic tables, corrals, and shade structures) to further encourage use.

Escondido Creek Trail Extension

This trail would accommodate cyclists and pedestrians, with added consideration for visitors that may attend events in the park. It is anticipated that the trail would be constructed to a width of approximately 8 feet (asphalt), with 2 feet of decomposed granite to one side and an additional 8 feet of decomposed granite adjacent to the other side to allow cyclists to ride the trail without having to maneuver through large crowds, if present. The trail would meander from Beven Drive to the proposed Mayflower Dog Park/El Caballo Park Connection bridge, where it would then narrow to approximately 12 feet (2-foot-wide decomposed sections on each side of an 8-foot-wide asphalt path). A fence would be installed to separate the trail from Escondido Creek. Native plants would be installed along the length of the trail for visual enhancement.

Other Walkways and Trails

A number of walkways and trails having varying characteristics are proposed to enhance circulation within El Caballo Park itself, as well as to provide improved pedestrian, bicycle, and equestrian circulation between the park, the Humane Society, and the dog park. Such elements would vary in width and would generally have concrete or decomposed granite surfaces. Several smaller pedestrian and/or equestrian bridges (over the existing tributary creek and at the southern end of Escondido Creek) within the park are also proposed to enhance connections between the elements and to better facilitate on-site circulation; refer Figure 2-5, *Proposed Master Plan*.

Lighting

To minimize the potential for adverse effects on the surrounding environment and on adjacent native wildlife habitat, lighting proposed with the Project would be kept to the minimum required to meet City park lighting requirements. It is anticipated that the El Caballo Park facilities would generally operate from sunrise to sunset, with special events that may extend into the evening hours (until 10:00 p.m.) several times per year, subject to a lease agreement with the City.

Nighttime lighting would be provided in key areas around proposed structures where events may be held, such as in the community gathering spaces and along on-site pathways, and elsewhere to ensure public safety and access. Lighting is not proposed at the main arena; however, nighttime lighting for the charreada arena (in the Lower Equestrian Area) is proposed. Nighttime lighting would also be provided at the proposed community hall building to support periodic evening events or gatherings.

Monument Signage

Four monument signs are proposed to identify entry points into the park and enhance the arrival experience. Monument signs are proposed in the northeastern portion of the park, north of Mayflower Dog Park (Monument Sign #1); at the southeast corner of the park at Beven Drive/East Valley Parkway (Monument Sign #2); at the southern park entrance at Beven Drive and Save A Life Way (Monument Sign #3); and within the northern portion of the park at the staging area/entry way to Caballo Trailhead (Entry Monument #4). Refer to Figure 2-5, *Proposed Master Plan*, which identifies the specific locations of the monument signs and the intended directional signage/destinations associated with each. Signage would be constructed in similar style and theme, and of natural stone, manufactured stone, and wood-like materials. Specific design guidelines are provided in the Master Plan.

Fencing, Walls, and Gates

Fencing is proposed throughout the park to guide pedestrian movement and public safety. Where potential conflicts may occur between horses and people, fencing of low to moderate height is proposed, with fencing of greater height proposed in areas where animal control would be needed. Proposed fencing would be comprised of various materials, serving different purposes, to complement the Mexican/western ranch style. Anticipated fencing types include 2-rail fence; 3-rail fence; 4-rail fence; pipe rail fence; and pipe rail fence with wood siding. Refer also to Figure 68, *Fencing Master Plan*, of the El Caballo Master Plan, for the planned location of various fence types.

New walls in the park would be made of dry-stacked stone to reflect similar stone walls historically used in the area to create terraces for the citrus groves, thus reflecting the craftsmanship of local ranchers. New walls may be used in various areas in the park to demonstrate historic construction methods, and thus, may provide an educational opportunity for visitors to the park.

A vehicular gate is proposed at the entry to the park along Save A Life Way. The gate is intended to enhance security by prohibiting night-time public entry to the park.

Landscaping

Landscaping design for the park is intended to integrate the park into the existing native plant palette with the introduction of additional native plants found in the southern California region. Non-native plant material would be utilized for the proposed lawn play areas. The planting of citrus trees and avocado trees to reflect the local historic land use of the area is also planned in the northern portion of the site. Other landscaping enhancements in the form of trees, shrubs, groundcover, and grasses are proposed throughout the park. Figure 2-5, *Proposed Master Plan*, provides an illustrative view of conceptual landscaping enhancements for the site. A sample plant palette is provided in the *Landscaping* section of the Master Plan.

Other Supporting Design Features

Furniture provided throughout the park may include benches and tables to allow for passive recreation, viewing, and social interaction. Such furniture is proposed to be rustic and made of natural looking materials. Benches or other such elements may be made from the Eucalyptus trees growing on-site (northwestern portion) at the time when they are removed to accommodate the proposed improvements.

Shade structures would be provided throughout the park to provide shade and to serve as meeting places for visitors to picnic or relax. Such structures would be of corrugated metal roofing material and Corten steel posts and beams, or possibly from large timber wood from the existing Eucalyptus trees to be removed on-site. Materials would be selected to reflect the ranch theme.

In various locations throughout the park, hitching posts would be strategically located for the temporary holding of horses. The posts would be constructed using treated wood posts and cross beams, possibly from the existing Eucalyptus trees on-site to be removed.

To reflect the natural rural character of the park, log tire stops would be used in all on-site parking areas, with exception of trailer parking spaces. The logs may be made from the existing Eucalyptus trees on-site and would identify the location of each parking stall.

Utilities

In support of the Master Plan, a site utility inventory was conducted to provide a general assessment of public utilities serving the Project site and surrounding area; refer to Figure 2-6, *Existing Utilities*. Prior to design development for implementation of the specific improvements proposed, an accurate survey would be conducted to locate all utilities and to determine any needed improvements.

Water

El Caballo Park is served by the City's public water system and Vista Irrigation District (VID); refer to Figure 2-6, *Existing Utilities*. Water service to the Project site would be provided by the City via existing connections or through minor on-site extension of water lines to serve the various areas where new facilities or improvements are proposed.

As a planning document, the Master Plan does not identify specific upgrades to the existing public water infrastructure system as engineering design details and use demands are currently unknown. Site-specific studies would be conducted as part of the discretionary process and as the various Master Plan phases are implemented to ensure that adequate water services are provided for the various Project components. If it is determined that future off-site water utility improvements are required outside of the development footprint considered for this IS/MND, additional evaluation pursuant to CEQA may be required, as appropriate and as determined by the City at the time when engineering design details are confirmed.

Sewer

Existing sewer lines are present in the eastern portion of the park and currently serve surrounding uses, including the humane society, Mayflower Dog Park, and Hidden Valley Obedience Club; refer to Figure 2-6, *Existing Utilities*. It is anticipated that wastewater flows generated by the Project would be accommodated via connection to the City's existing public sewer system. All of the City's wastewater is routed to and treated at the City-owned and -operated Hale Avenue Resource Recovery Facility (HARRF), located at 1521 S. Hale Avenue. All existing or proposed gravity sewers would be designed to convey peak dry weather flows in accordance with the City of Escondido 2012 *Wastewater Master Plan*.

As a planning document, the Master Plan does not identify specific upgrades to the existing public sewer infrastructure system as engineering design details and use demands are currently unknown. Site-specific studies would be conducted as part of the discretionary process and as the various Master Plan phases are implemented to ensure that adequate sewer services are provided for the various Project components. If it is determined that future off-site sewer utility improvements are required outside of the development footprint considered for this IS/MND, additional evaluation pursuant to CEQA may be required, as appropriate and as determined by the City at the time when engineering design details are confirmed.

Stormwater and Drainage Facilities

Stormwater from the Project site discharges to Escondido Creek; refer to Figure 2-6, *Existing Utilities*. Drainage and stormwater quality treatment for the Project would be designed to treat stormwater runoff originating from the Project site and specific use areas as close to the points of generation as possible. Off-site flows would be diverted so as to not interfere with or overload treatment facilities designed to treat smaller specific areas. Existing off-site flows would pass through via an existing channel, and/or around, the Project site untreated and un-detained. .

Under existing conditions, the main off-site flows entering the Project site are in the form of a channel that concentrates runoff from the adjacent hills and the overflow of Lake Dixon. The channel traverses the park from the northwest to the southeast with connection to the Escondido Creek channel. The channel is partially vegetated, partially concrete-lined, and partially rock-lined. Proposed improvements include minor grading to improve the edges at the lower end;

revegetation of native plants; and removal of existing concrete sides to be replaced with softened edges and vegetation; refer to Figure 2-7, *Proposed Drainage/Water Quality Concept Plan*.

A new on-site culvert crossing is proposed for vehicular access and would include upstream and downstream riprap. This culvert would be designed to convey 100-year flows without overtopping. A second pedestrian crossing is proposed on-site, upstream from the vehicular crossing and is anticipated as a clear-span walkway deck that would not impact flow within the channel.

On the east side of Escondido Creek, the existing dirt lot that would be converted to an overflow decomposed granite parking lot that currently drains westerly via sheet flow and shallow concentrated flow towards a curb inlet that discharges into Escondido Creek. No substantial hydrologic or hydraulic changes are proposed for this area. It is anticipated that new storm drain and area drains would be installed within the decomposed granite parking lot to facilitate drainage during intense storms and reduce future maintenance.

The Master Plan also considers future conversion of the segment of Escondido Creek that traverses the Project site (approximately 1,300 linear feet) to a more natural state by removing the existing concrete sides and a portion of the concrete bottom and replacing them with native vegetation to achieve a more natural solution to stormwater drainage. To reduce the potential for reduced capacity and potential off-site flooding from the overgrowth of vegetation, installation of a channel bottom constructed of rock, concrete, or modular cells is recommended to reduce erosion where vegetation may not be established within the channel (Michael Baker 2024).

As the Project has been envisioned at a Master Plan level, site-specific engineering design would be required as the various components are implemented. However, the Master Plan identifies the following on-site drainage improvements as potentially occurring with Project implementation and would be confirmed (or revised) during final engineering design. Refer to Figure 2-7, *Proposed Drainage/Water Quality Concept Plan*, for the anticipated on-site drainage areas referenced below.

Eucalyptus Grove Area along Northerly Boundary (Drainage Area A)

The northwest quadrant portion of the site (Drainage Area A) receives runoff from the hillsides within Daley Ranch. With exception of some non-native plant removals, the northwest quadrant of the site would remain in a natural state and stormwater flows would continue to flow to the natural on-site channel, as they have historically.

The southerly Project boundary accepts runoff from the hillsides located just south of the Project site. Per the Master Plan, these flows would be collected in a proposed brow ditch, channeled away from the Project development area, and discharged to points at the western and the eastern ends of the natural on-site channel.

Improved Existing Arena Area (Drainage Area B)

As indicated in the Master Plan, stormwater runoff from the existing arena area would drain via sheet flow to the area of the paved fire access road. The arena area would be considered self-treating as it would be surfaced with a sand-soil mixture which would provide a high moisture-holding capacity compared to expected rainfall amounts and would not produce any significant runoff. Surrounding areas would remain of natural ground surface and are therefore anticipated to have a high infiltration rate. Any runoff reaching the paved fire access road would be substantially pre-treated by the time it reaches the pavement. Once reaching the pavement, runoff

would flow along the paved access road to a planned infiltration/bio-retention area at the southern end of the trailer parking area (Drainage Area E).

Lower Equestrian Area (Drainage Area C)

With Master Plan implementation, the lower equestrian area would be composed of one rectangular arena and two smaller round arenas. The ground surface would slope upwards to the west, with a proposed shade structure/concession area located at the top of slope and amphitheater style seating in the vicinity. It is anticipated that drainage from Drainage Area C would sheet flow to a proposed infiltration/bio-retention area next to the existing flow-through drainage channel. All runoff from this area would be treated either via natural process (i.e., infiltration) as it travels to the proposed bio-retention area, or treated in the proposed bio-retention area before being released to the flow-through channel.

Common Gathering and Picnic Area (Drainage Area D)

The common gathering and picnic area would be surfaced with turf (grass) and surrounded by decomposed granite sidewalks. The area would be graded to drain to the lawn area where it would be treated via natural processes. Any excess runoff would be piped to the flow-through channel.

Trailer Parking Area (Drainage Area E)

The trailer parking area would drain via sheet flow in a southerly direction. At the northern end of the trailer parking area, a maintenance building and covered areas where accumulated horse waste products would be temporarily stored prior to removal are proposed. The parking area would be surfaced with decomposed granite and would provide for subsurface storage and stormwater infiltration. Runoff from the relatively small impervious area of the maintenance building and muck storage areas would be treated via natural processes during its flow across the decomposed granite parking area. Per the Master Plan, it is anticipated that any runoff reaching the southern end of this area would be treated in the above-mentioned infiltration/bio-retention area.

Therapeutic Arena Area (Drainage Area F)

Under existing conditions, the therapeutic arena area slopes gradually to the south and is of a natural ground surface or engineered equestrian soil mix. Per the Master Plan, it is anticipated that stormwater flows from this area would follow the existing ground slope and drainage patterns and drain southerly along Save A Life Way. All surface runoff in this area would be treated via natural processes (i.e., infiltration).

Overflow Parking Area (Drainage Area G)

The proposed overflow parking area slopes to the south and would be surfaced with decomposed granite, allowing for sub-surface storage and infiltration of stormwater. As anticipated by the Master Plan, any precipitation that becomes stormwater runoff would be collected in an infiltration/bio-retention area at the southerly end of the parking area where it would be treated via infiltration or otherwise treated and released.

Although future development of the subject property would result in the addition of impervious surfaces on-site, the Project would not substantially change existing drainage patterns, nor increase the rate or volume of stormwater runoff from the subject property. The Project would be required to implement best management practices (BMPs) in conformance with the City's

Stormwater Design Manual and Municipal Code Chapter 22-26 requirements to reduce long-term water quality impacts. All proposed stormwater infrastructure improvements and site grading would be subject to City discretionary review and approval of a grading permit.

Refer also to Section 3.10, *Hydrology and Water Quality*, for additional discussion. The *Stormwater Technical Memorandum* is provided as Appendix E.

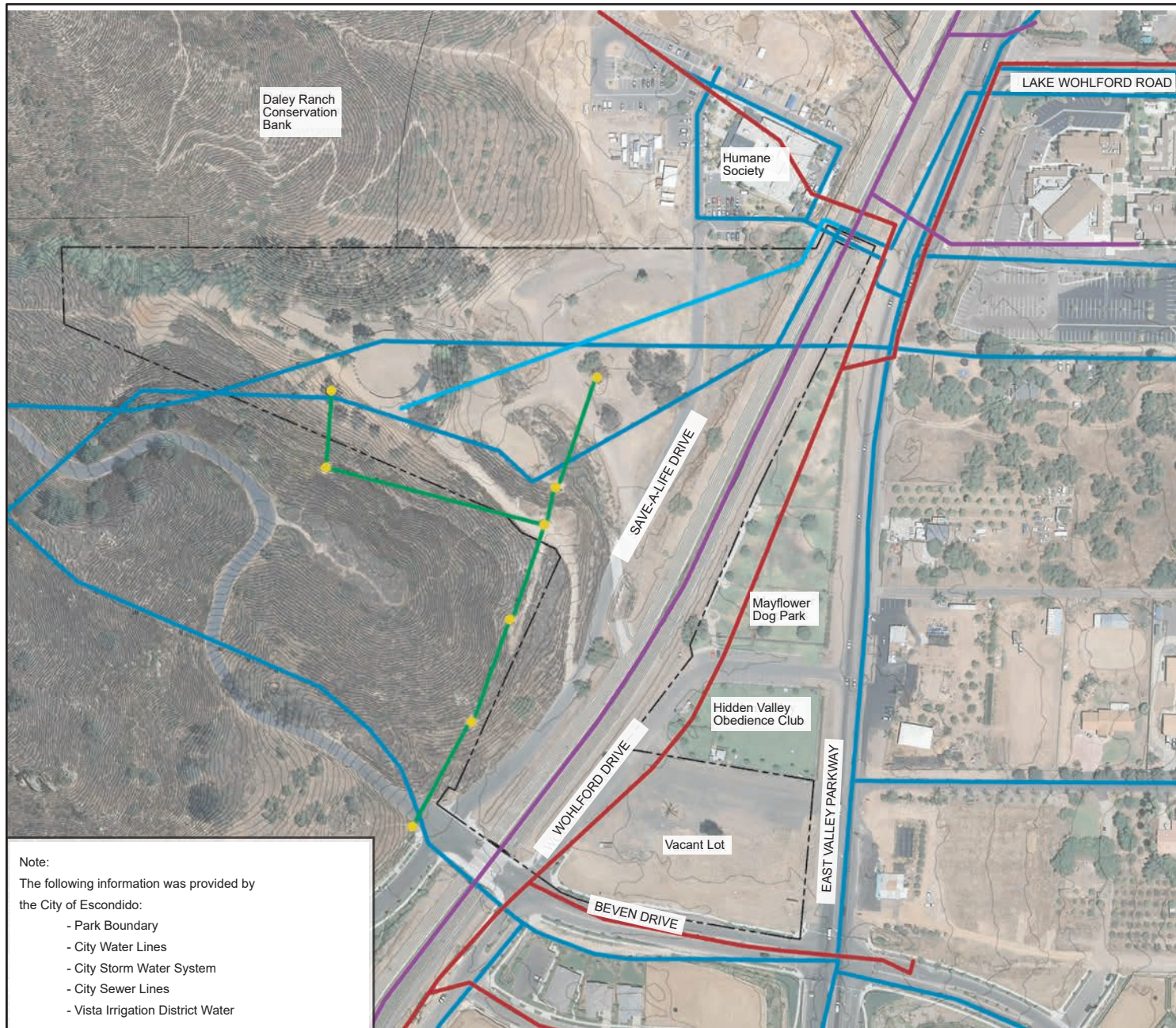
Electricity

Electrical lines currently extend into the site and serve existing uses at El Caballo Park; refer to Figure 2-6, *Existing Utilities*. The Project would tie into existing services and it is not anticipated that additional transmission lines or system upgrades would be required to convey electricity to the Project site. The need for any specific new connections for service would be determined at the time when detailed design plans are prepared for the specific improvements proposed. If it is determined that future electrical system improvements are required outside of the development footprint considered for this IS/MND, additional evaluation pursuant to CEQA may be required, as appropriate and as determined by the City at the time when engineering design details are confirmed.

2.6 General Plan Land Use and Zoning

The Project site is located within the General Plan land use designation of SPA 5 (Northeast Gateway SPA #5) and governed by the Northeast Gateway Specific Plan Area (SPA) with a zoning designation of S-P (Specific Plan Area). The site currently supports the existing park use; the proposed improvements and continued use of the park would not conflict with the existing zoning or land use designations. No changes to the existing zoning or General Plan land use are required or proposed to allow for Project implementation.

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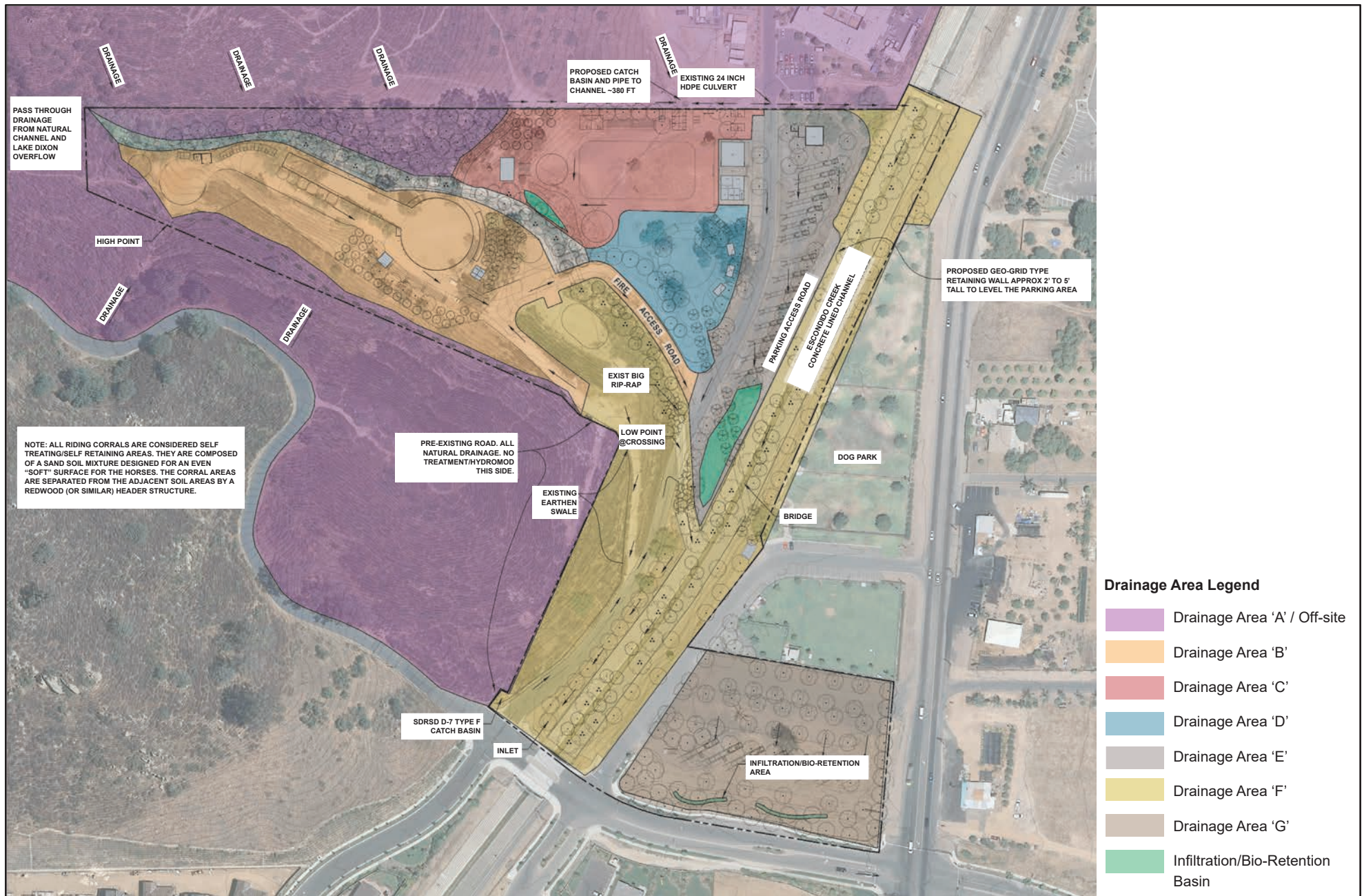


Utility Inventory Legend

- Park Boundary
- Electric Lines
- Escondido Water
- Vista Irrigation District Water
- Escondido Sewer
- Escondido Storm Drains



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2.7 Project Construction

Grading and Site Preparation

Master Plans by their nature are programmatic or visionary documents, and they do not contain architectural or engineering plans. Accordingly, conservative assumptions have been generated for modeling inputs used in the analyses in Section 3 of this IS/MND (e.g. construction emissions and noise). These inputs include construction methods, equipment, hours of equipment operation, grading quantities, and worker and haul truck trips.

It is anticipated that minor grading would be required to resurface various on-site areas to provide a level surface to accommodate the equestrian-related and recreational facilities, as well as proposed structures (i.e., maintenance building, community hall, restrooms). Minor grading would also be required for the surface parking areas and vehicular access improvements. Additionally, removal of the existing concrete from a portion of the on-site tributary creek channel and from the Escondido Creek channel (as well as sculpting of the channel sides) would require excavation and grading activities. Minor grading is also anticipated to be required to accommodate proposed improvements such as walkways, creek crossings, and other similar enhancements.

Future Project construction activities would generally be completed in 8- or 10-hour shifts, with a total of approximately five shifts per week (Monday to Friday). Construction would occur as allowed by Chapter 17, Article 12, Sections 17-234, Construction Equipment, and 17-238, Grading, of the City's Noise Ordinance, which limits construction activities to Monday through Friday between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays between the hours of 9:00 a.m. and 5:00 p.m. Any overtime and weekend work may occur as necessary to meet scheduled milestones or accelerate the schedule and would comply with applicable California labor laws as well as local City regulations regulating construction activities.

Project Phasing

The Master Plan is intended to provide a vision and implementation strategies for how the desired improvements to the park may be achieved. The proposed improvements would be implemented as funding is identified and with flexibility to accommodate community needs over time. As discussed in the Master Plan, it is anticipated that park improvements would be constructed in phases, as described below; refer also to Figure 2-8, *Proposed Phasing Plan*.

Phase 1A – Existing Arena Improvements and Park Sign Monuments

Phase 1A would largely consist of improvements to the Existing Arena Area in the northwest portion of the site, as well as limited improvements within the Lower Equestrian Area to provide access.

This phase would involve enhancements to the existing arena and associated equestrian facilities, as well as installation of new bleachers and slope seating; new cow pens, horse corrals, round pen, wash racks, trash enclosure, and muck bin; a changing room; and a ticket booth and restrooms. The proposed equestrian entry path from the adjacent Daley Ranch would also be constructed, as well as an ADA accessible path, new parking, an improved 24-foot-wide, two-way driveway, fencing, stormwater management facilities, and landscaping. Access improvements would include construction of emergency access with a turn-around loop.

Phase 1B – Escondido Creek Trail Extension

Phase 1B would be separate from Phase 1A but may also be implemented at the same time (and funded by the City with funds associated with the Escondido Creek Trail extension). This phase would involve improvements for the Escondido Creek Trail extension parallel to the creek.

Phase 2A – Main Central Public Gathering Space and Park Entry

Phase 2A would consist of a number of equestrian and recreational-related improvements proposed for the Lower Equestrian Area and maintenance-related improvements proposed for the Horse Trailer Parking Area. Landscaping improvements, fencing and minor passive recreational enhancements in the Lower Multi-use Parking Area are also included in this phase.

This phase would result in the construction of a central gathering area to attract visitors to the park who are not necessarily equestrians, thereby offering community space for public use. Within the Lower Equestrian Area, improvements would include construction of a 55-foot-wide round pen, four 12-foot by 12-foot corrals, a mounded lawn area and a secondary lawn area with paved walkways, public art areas, picnic shade structures, and a nature exploration area. Additionally, surface parking along Save A Life Way would be constructed.

Phase 2A would also include construction of the proposed maintenance building, muck storage, and trash enclosure, as well as associated maintenance parking in the Horse Trailer Parking Area. Improvements in the southeastern portion of the park, in the Lower Multi-use Parking Area (east of Wohlford Drive), would be installed to enhance the park entry and would include a new decomposed granite pathway with benches, a bicycle rack, drinking fountain, fencing, landscaping improvements, surface parking, and a park entry monument.

Phase 2B – Escondido Creek Bridge and Restrooms

Phase 2B would include the proposed pedestrian bridge across the Escondido Creek channel in the eastern portion of the park to provide a physical link between El Caballo Park and Mayflower Dog Park. Public restrooms proposed along the southwest side of Mayflower Dog Park would also be constructed.

Phase 3 – Main Lower Equestrian Park Area

Phase 3 would involve improvements within the Existing Arena Area, Lower Equestrian Area, Horse Trailer Parking Area, and Mayflower Dog Park/El Caballo Park Connection Area.

In the Existing Arena Area, improvements would consist of removal of the existing eucalyptus trees in the northwestern portion of the Park and replacing them with native trees.

In the Lower Equestrian Area, improvements would include construction of new amphitheater seating and bleachers, a 55-foot diameter round pen, 100-foot by 200-foot arena, two 20-foot by 20-foot corrals, wash racks, and fourteen 12-foot by 12-foot corrals to support equestrian operations and training. The staging area providing access to the Caballo Trailhead would be constructed, and accessible parking stalls would be provided along Save A Life Way. The new community hall building would also be constructed.

In the Horse Trailer Parking Area, improvements would include provision of new trailer parking with decomposed granite surface, a maintenance facility structure, trash enclosure, and muck

storage facility. Pedestrian access to the existing pedestrian bridge located at the northeastern corner of the park would also be provided.

In the Mayflower Dog Park/El Caballo Park Connection Area, a pedestrian walkway would be constructed across Save A Life Way, connecting the Park to the proposed pedestrian bridge across the Escondido Creek channel (to be constructed with Phase 2B). Associated landscaping would be planted along the west side of the channel.

Phase 4 – Lower Overflow Parking and Trail Extension

Phase 4 would include improvements in the Lower Multi-use Parking Area. Such improvements would include construction of the proposed overflow surface parking lot in the southeastern portion of the site, just west of East Valley Parkway. The lot is anticipated to include six trailer/motorhome parking spaces (28 feet by 75 feet, each space) along with parking for single-occupancy vehicles, including accessible parking. Landscaping is proposed for visual enhancement as well as for shading.

Equestrian, pedestrian, and bicycle access to the main park would be enhanced via construction of a new 16-foot-wide bridge, of decomposed granite surfacing across Escondido Creek, immediately north of the existing vehicular bridge along Beven Road and just west of Wohlford Drive.

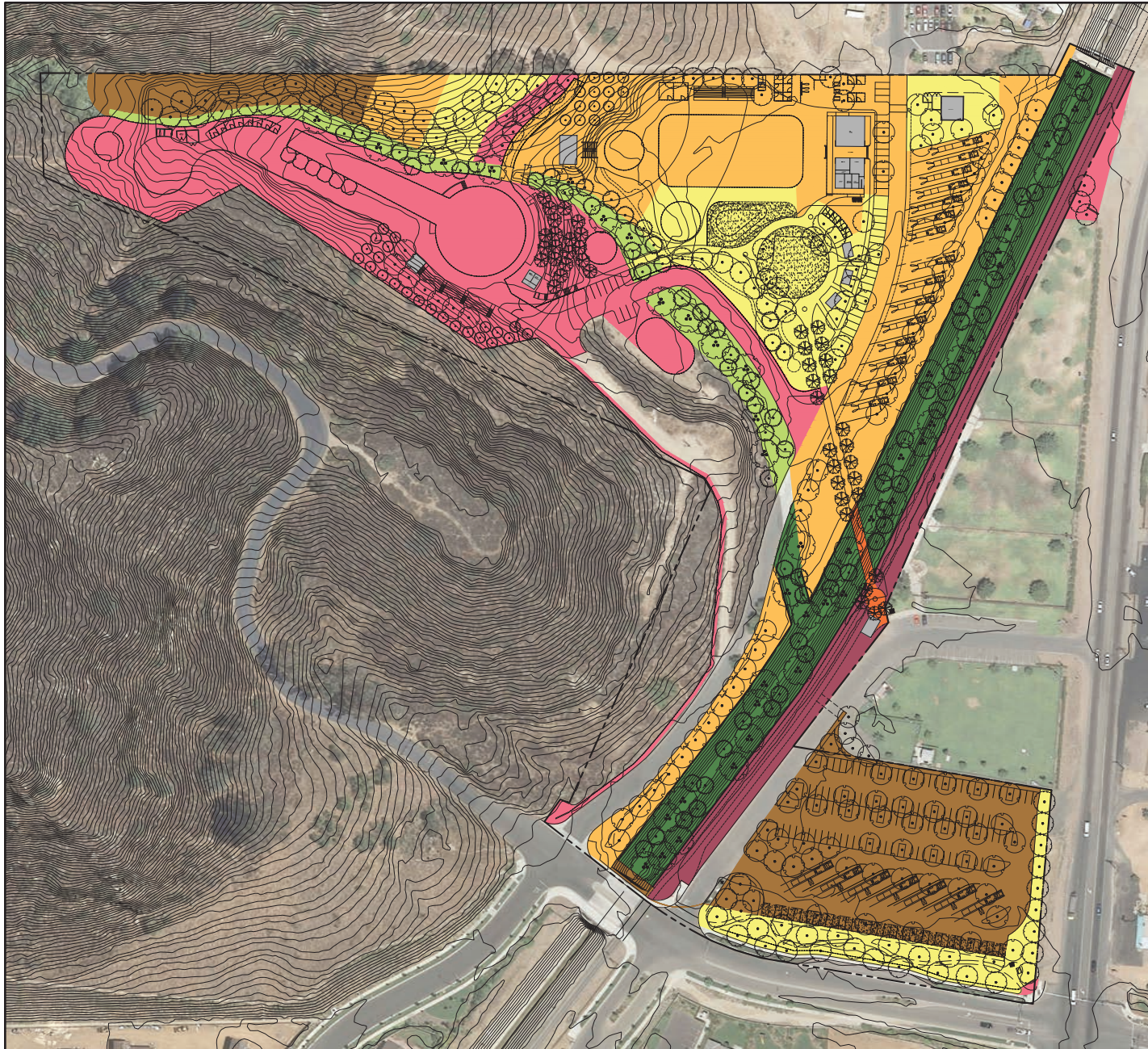
Phase 5 – Tributary Creek Improvements

Phase 5 would include minor grading to improve the edges of the tributary creek to Escondido Creek which extends from the northwestern portion of the site, trending to the southeast, and ultimately connects to Escondido Creek; refer to Figure 2-7. Phase 5 would also include removal of the existing concrete sides of the tributary channel, to be replaced with softened edges and then revegetated.

Phase 6 – Concrete Escondido Creek Channel Conversion to Soft Creek

Phase 6 would include modifications to the existing Escondido Creek concrete channel to soften the visual quality and enable increased infiltration of surface water through the ground surface.

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Phasing Legend

- Phase 1A
- Phase 1B
- Phase 2A
- Phase 2B
- Phase 3
- Phase 4
- Phase 5
- Phase 6



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2.8 Operational Characteristics

Park Use

The Master Plan is intended to create opportunities for park visitors to indulge in equestrian activities and also to explore nature, learn about the history of the area, and attend equestrian events and dog shows. Daily use of El Caballo Park for recreational purposes such as walking, bike riding, or general relaxation, as well as for equestrian use and training, would be enhanced with the proposed improvements. It is anticipated that area residents or visitors from surrounding communities would use the park mainly in the evenings or on weekends, taking advantage of the amenities for gathering and for passive and active recreation. Equestrian activities would occur during the daytime throughout the week, as well as weekends.

Events

El Caballo Park currently supports a variety of equestrian activities, including use by the Charros of Escondido to conduct charreadas and choreographed horse shows by the Escaramuzas, as well as equestrian shows and other cultural events. The Charros compete with other teams from California and Mexico, with events held at the site on Sundays. An estimated 25 to 30 active participants are typically involved with each event.

For events and practices, horse trailers are used to transport the horses to the site. Additionally, hay is not routinely delivered to the site for feeding of horses. Hay is delivered as needed via truck(s) at times when special events are held. With implementation of the Master Plan, the park would continue to support ongoing equestrian training and riding opportunities in the community, as well as practice for the Charros. Additionally, the charreadas would continue to be held on Sundays.

With the proposed improvements, on-site facilities would be able to accommodate additional spectators, as expanded spectator seating would be provided in the form of bleachers, an amphitheater, and seating along the adjacent slope to the south. A new ticket booth and restrooms, concessions, and picnic areas, among other amenities, would support public events held at the site.

Additionally, the new facilities would include a bandstand for musical performances and an announcer's stage for announcing various events held at the arena and/or adjacent on-site areas. Performances utilizing amplified music and speakers are currently a part of charreadas under existing conditions. It is anticipated that all events held at the park, whether it be for continued charreadas or for public or private events (i.e., held at the community hall building) would occur in conformance with City regulations for hours of operation, which generally range from sunrise to sunset, and until 10:00 p.m. for special events.

In addition to the charreadas, special events may be held at the park. Such events may include other equestrian events or shows or events held by private parties or organizations that would rent the facilities. The number of attendees would vary depending on the type of event.

Overnight parking is not currently allowed at El Caballo Park. Improvements proposed include surface parking areas that would accommodate horse trailers and motor homes. Although not

proposed at this time with implementation of the Master Plan, short-term, overnight trailer or recreational vehicle parking associated with future equestrian or other multi-day events may be permitted with the Project. Additionally, on-site food trucks or vendors may support planned events. City review of approval of a conditional use permit or special use permit would be required to regulate overnight parking, food trucks, and/or vendors on-site; refer to Section 2.9, *Anticipated Discretionary Actions and Approvals*, for additional discussion.

Under current conditions, the boarding of animals on-site is not permitted. Although not currently planned, any on-site animal boarding with future park operations would be regulated through City discretionary review and permitting or lease agreement(s). The community hall building would offer a multiuse space, restrooms, office space, a caretaker's apartment, and kitchen/concessions space. The building is intended to have an open hall space that can be used for public and private events. The space would be available for rent to private parties for weddings, educational field trips, retreats, meetings, or other such activities, thus generating revenue that would contribute to maintenance and operational costs for the park facilities. The City, or other public organizations, may use the space to hold special community events or public meetings, as well as for educational opportunities.

Food concessions would be provided at the community hall building to serve special events held at the park. Food trucks may also be utilized on-site at special events. Such operations would occur within typical operating hours at the park (i.e., daytime and evening hours). However, City approval of a special event permit may be required to ensure that on-site operations during such events remain in compliance with applicable use restrictions (i.e., for food trucks or concessions beyond that which would occur with operation of the proposed permanent concession stand). Operation of food trucks on-site would be subject to City of Municipal Code requirements, including Section 8.32.100, Food Truck Vending Requirements, and Chapter 5.04 pertaining to business licensing. Table 2-2, *Existing and Anticipated Park Operations*, identifies existing activities and attendance under current and anticipated future conditions for daily use of the park facilities and for special events that may be held.

Table 2-2: Existing and Anticipated Park Operations

Activity	Existing Condition (Estimated) Frequency	Existing Condition (Estimated) Attendees/Participants	Anticipated Future Condition (Estimated) Frequency	Anticipated Future Condition (Estimated) Attendees/Participants
Charreadas	Once Weekly	50-300 Attendees/ 25-30 Participants	Once Weekly	Up to 500 Attendees/ 25-30 Participants
Practice for Charreadas	Once Weekly	25-30 Participants	Once Weekly	25-30 Participants
Special Events	4-6 times /year	Up to 250 Attendees/ 20-30 Participants	4-6 times/year	Up to 250 Attendees/ 25-30 Participants
Community Hall Use (Community Events, Public Meetings and Educational Opportunities)	--	--	6-8 times/year	Max. Occupancy 320 (Estimated) ¹
Park Use (Picnicking; General Equestrian Facility Use)	Daily	75-100	Daily	125-150

¹ Estimated based on 2022 California Building Code occupant load factors of 5 square feet/person for standing room (parties, standing events, open floor) and 15 square feet/person for sitting room (banquet events, community meetings) (CBC 2022).

Trail Use

Existing trails within the vicinity of the Project site include Caballo Trail within Daley Ranch, and the Escondido Creek Trail, which runs adjacent to the Escondido Creek channel. Implementation of the proposed staging area for users of the Caballo Trail, offering hitching posts, picnic tables, corrals, and shade structures, would create new opportunities for people to gather and utilize the facilities. The Master Plan would extend the Escondido Creek Trail from the south, providing pedestrians and cyclists with a destination and entry into the park. Improvements to enhance and widen the trail would better accommodate pedestrians and riders, allowing for expanded use of the trail and improving public use and safety.

While these improvements would enhance the equestrian and community trail facilities at the park, it is not anticipated that area trail use would be substantially increased. Use of the public trails would be expected to continue mainly on the weekends or during early evening hours, with potential increased use during special events. No change to existing trail restrictions or hours of use are proposed with Project implementation.

Maintenance

The Master Plan includes a community hall building which would feature a second-floor caretaker's apartment. It is anticipated that the apartment would be occupied by an on-site, full-time maintenance worker to allow for routine park maintenance and general security purposes.

Routine maintenance of the equestrian and park facilities is anticipated to be similar to that which occurs under existing conditions. Reflective of current park operations, equestrian uses on-site with Project implementation would not generate substantial amounts of animal waste. All arenas, corrals, round pens, and other equestrian facilities would be maintained and cleaned on a daily

basis to ensure proper management and removal of animal waste. As noted, a muck storage area (covered) is proposed in the northeastern portion of the site to temporarily accommodate and maintain animal waste on-site. All animal waste would be properly handled and disposed of in accordance with standard procedures and applicable public health and safety regulations, similar to that which presently occurs.

Additionally, the City of Escondido Police Department, Animal Services Division, handles animal control, nuisance complaints, waste/sanitation issues related to animals, and enforcement of local and state animal regulations. Such oversight would further ensure that on-site operations do not result in potential adverse effects on surrounding uses.

Landscaping maintenance would also occur within El Caballo Park. It is anticipated that such maintenance would occur on a routine basis (i.e., bi-weekly) using standard equipment (i.e., mowers, tree trimmers) as needed, similar to that which presently occurs on-site.

2.9 Funding

Funding is not currently available for implementing the improvements identified in the El Caballo Park Master Plan. Future funding must be obtained by the City for Project construction as well as design development, improvement drawings, and permitting fees, as appropriate, to allow for the intended improvements as they are undertaken.

It is anticipated that Project funding would come from various federal, state, and local sources in the form of grants and monetary sources; public donations received by the City; and rental and leasing payments from private and public sources. Construction costs may be reduced with volunteer support from the community or other area organizations. Such assistance may include construction of fencing, arena footing material installation, landscaping, site furniture construction, stone wall installation, and/or shade structures, or other similar improvements.

Table 2-3 includes a partial list of potential revenue generation opportunities as identified in the Master Plan. See also the “*Funding Opportunities*” section of the Master Plan which provides additional funding sources, along with a detailed description of each.

Table 2-3: Potential Funding Sources

Source Level	Agency/Organization	Program/Fund Description	Program/Fund Description
National	US Department of Education	Land and Water Conservation Fund	National Oceanic and Atmospheric Administration Bay Watershed Education and Training Program
National	Environmental Protection Agency Environmental Education Grants	Youth Garden Grant	Operation Green Planet Free Seed Grants
National	Playground Grants	Grants.gov	Recreation Trails Program
National	The Foundation Center	DonorsChoose.org	American Honda Foundation
State	California State Parks Foundation	California Conservation Corps	Habitat Conservation Fund
State	Caltrans Transportation Planning Grant Program	Statewide Park Program	Land and Water Conservation Fund
State	Wildlife Conservation Board Public Access Program	State Highway Operations & Protection Program	Environmental Enhancement and Mitigation Funds
Local	San Diego Association of Governments	Regional Surface Transportation Program	Rental or leasing fees from private individuals and/or public and private organizations, businesses, and other parties

As indicated, local funding may come from rental or leasing of the various park amenities (i.e., community building, equestrian facilities) by private parties or local businesses, organizations, or other entities for one-time events such as weddings, birthdays, equestrian events or competitions, and/or other gatherings. Additionally, park facilities may be rented or leased by private and/or public local organizations or groups, such as therapeutic organizations (i.e., Wounded Warriors), equestrian riding schools or for lessons, as well as local businesses for employee retreats, conferences, or other gatherings.

Funding may also be generated by short-term, overnight trailer parking associated with planned equestrian or other events, as well as food trucks or vendors that may support such events. Overnight parking is currently not allowed at the park; City review and approval of a conditional use permit or special use permit would therefore be required prior to any overnight parking being allowed on-site for certain events. Similarly, operation of food trucks or other vendors would require City review and permit approval, prior to any such events or activities occurring on-site, as appropriate.

2.10 Anticipated Discretionary Actions and Approvals

A list of various discretionary approvals and permits from public agencies, including the City of Escondido, anticipated to be required with future implementation of the Master Plan is included in Table 2-4, below. The list is intended to summarize the potential permits and regulatory approvals that may be needed based on the proposed Master Plan and anticipated requirements; however, this list may not be all-inclusive of those approvals and permits ultimately required with Project implementation. Such determinations would be confirmed at the time the proposed improvements are initiated.

New buildings would require City approval of building permits. Vegetation removal would potentially require a vegetation removal permit, while landscape plans may be required for new landscaping around proposed buildings and in the parking lots. Additionally, grading permits would be required to allow for a number of the proposed improvements, including those associated with drainage/hydromodification plans.

Improvements to Escondido Creek would require permitting with the US Army Corps of Engineers, the California Department of Fish and Wildlife, and the San Diego Regional Water Quality Control Board, at a minimum.

Future operation of the planned park facilities may involve rental or lease agreements with private parties, local businesses, or other entities for one-time events (weddings or birthdays; equestrian events or competitions; employee retreats or meetings; and/or other gatherings); equestrian riding schools or similar organizations providing equestrian training; and/or other activities. Food trucks or other vendors may also operate on-site during special events. City review and approval of a conditional use permit or special use permit; business license review; or other applicable approvals or permitting may therefore be required to regulate such activities. Any short-term, overnight trailer parking associated with planned equestrian or other events would also require City review and approval of a conditional use permit, special use permit, or lease agreement, prior to such activities being permitted on-site. However, such reviews and/or approvals would occur on an as-needed basis with respect to the activities involved and are not required to implement the El Caballo Park Master Plan.

Table 2-4: Required Approvals and Permits

Approval/Permit Required	Approving Agency	Lead/Trustee/Responsible Agency
Master Plan	City	Lead Agency
Mitigated Negative Declaration	City	Lead Agency
Improvement Plans	City	Lead Agency
Building Permits	City	Lead Agency
Grading Permits	City	Lead Agency
Conceptual Landscape Plan	City	Lead Agency
Vegetation Removal Permit	City	Lead Agency
Plot Plan	City	Lead Agency
General Construction Stormwater Permit	San Diego Regional Water Quality Control Board (RWQCB)	Responsible Agency
Construction Permit and/or Encroachment Permit	City	Lead Agency
Streambed Alteration Agreement (Section 1602)	California Department of Fish and Wildlife (CDFW)	Trustee Agency
Clean Water Act Permit (Section 404)	US Army Corps of Engineers (USACE)	Responsible Agency
Clean Water Act Permit (Section 401 Clean Water Certification)	San Diego RWQCB	Responsible Agency

3.0 ENVIRONMENTAL CHECKLIST

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. All such impacts would be reduced to less than significant with mitigation measures incorporated; no significant and unavoidable impacts would occur.

- ☐ None
- ☐ Aesthetics
- ☒ Biological Resources
- ☒ Geology/Soils
- ☐ Hydrology/Water Quality
- ☐ Noise
- ☒ Recreation
- ☐ Utilities/Service Systems
- ☐ Agriculture & Forestry Resources
- ☒ Cultural Resources
- ☐ Greenhouse Gas Emissions
- ☐ Land Use/Planning
- ☐ Population/Housing
- ☐ Transportation
- ☐ Wildfire
- ☐ Air Quality
- ☐ Energy
- ☐ Hazards & Hazardous Materials
- ☐ Mineral Resources
- ☐ Public Services
- ☒ Tribal Cultural Resources
- ☐ Mandatory Findings of Significance

Determination

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

Sally Schiffman
Signature

Sally Schiffman
Printed Name

3/25/26
Date

Principal Planner
Title

Evaluation of Environmental Impacts

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources cited. 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.

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, and construction as well as operational impacts.

A “Less Than Significant Impact” applies when the proposed Project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.

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

“Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less Than Significant Impact.” The initial study must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION OF IMPACTS

a) *Would the project have a substantial adverse effect on a scenic vista?* **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 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 General Plan EIR, the City does not designate scenic vistas. However, Policy 3.6 of the City's General Plan Resource Conservation Element requires that development within the I-15 corridor be located and designed in consideration of its potential visual impacts and preservation of prominent views along the corridor. Such views include "outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings" (City of Escondido 2012a). Development projects within 1,750 feet of I-15 are required to prepare a visual analysis and demonstrate conformance with specific design policies.

The Project site is located approximately 4 miles east of I-15 at its closest point. Views of the Project site are not afforded from I-15 due to distance, topographic conditions, intervening

vegetation, and development. Thus, the Project would have no impact to scenic views from this roadway.

Although the Project site does support hillsides in the western and southern portions that may exceed a 15 to 25 percent slope, Figure VII-5, *Slopes and Ridgelines*, of the City's General Plan Resource Conservation Element does not identify any designated intermediate or skyline ridges on the Project site. The nearest designated skyline ridge is located south of the Project site, just south and southeast of Lake Dixon (City of Escondido 2012a). No such resources would be affected by the proposed improvements.

The Project would enhance and add to the existing facilities at El Caballo Park. The proposed improvements would generally occur on the lower portions of the site and would not disturb the upper slopes or surrounding ridgelines. With exception of the surface parking area in the southeastern portion of the site and adjacent views from Beven Drive and Wohlford Drive, the park improvements would generally not be visible from off-site public roadways to the east (i.e., East Valley Parkway).

Based on the above conditions, the Project would not have a substantial adverse effect on a scenic vista. No impact would occur.

Mitigation Measures: No mitigation is required.

- b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? **No Impact.***

According to the General Plan EIR and the California Department of Transportation's State Scenic Highway System Map, there are no officially designated or eligible state scenic highways in the City of Escondido. The nearest officially designated state scenic highway is a segment of SR 52, approximately 20.1 miles southwest of the Project site. The nearest eligible state scenic highway is a segment of SR 76, approximately 9.8 miles northeast of the Project site at its closest point (Caltrans 2018). Views of the Project site are not afforded from SR 52 or SR 76 due to distance, topographic conditions, intervening vegetation, and structures.

The Project would not substantially damage scenic resources within a state scenic highway. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

The Project site is located in an urbanized area, as defined by CEQA Guidelines Section 15387. Although the setting is somewhat suburban, the site is within the vicinity of other existing development located to the east and south, and is presently served by existing utilities and paved

access roads. 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 site currently supports equestrian and park facilities, as well as surface parking; undeveloped portions of the site generally remain in a natural state. As such, the Project as proposed would be consistent with uses already occurring on the site and would serve to enhance the existing conditions.

As discussed under Responses 3.1(a) and 3.1(b) above, the proposed improvements would not adversely affect any resources having scenic quality. The Project would not introduce new structures that would block scenic views of existing hillsides, ridgelines, or hilltops, as the proposed improvements would be located along the lower portions of the property. Existing scenic views of such resources from surrounding public vantage points would remain.

The Project site has a General Plan land use designation of SPA 5 (Northeast Gateway SPA #5) and is governed by the Northeast Gateway Specific Plan Area (SPA), with a zoning designation of S-P (Specific Plan Area). The Specific Plan includes various land use, grading, architectural design, landscaping, and circulation development standards that aid in governing scenic quality. The El Caballo Park Master Plan has been developed with consideration for the Northeast Gateway Specific Plan, as appropriate, to ensure compatibility with development measures identified. Measures are provided in the Specific Plan to address grading, landscaping, and architectural design. As specific improvements identified in the Master Plan are implemented and Project design details (i.e., grading design, nighttime lighting) are available, conformance with the Specific Plan would be considered to ensure Project compatibility and to avoid potential conflict with regulations addressing scenic quality.

Project components would be designed in accordance with the Escondido Municipal Code and El Caballo Park Master Plan to ensure that development reflects required design requirements (e.g., building placement, landscaping enhancements, architectural character, signage). Project construction and operation would be subject to City Municipal Code regulations aimed at reducing potential visual effects. Relevant regulations include, but may not be limited to, Article 35, Outdoor Lighting; Sections 33-1068.C and 33-1069 for impacts to mature and protected trees; and Section 33-1066, Design Criteria, pertaining to grading requirements. Implementation of the Project would be required to demonstrate compliance with such regulations.

Based on the above, the Project would be consistent with applicable development standards governing scenic quality. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day 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 with exterior façades largely or entirely comprising 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 could involve temporary daytime glare impacts as a result of construction equipment and materials, and, based on the Project's limited scope of activities, such potential sources of glare are not considered to be substantial and would be similar in character to existing daytime glare in the area (such as from automobiles). Impacts in this regard are considered less than significant.

The Project site is currently developed with existing equestrian facilities, supporting infrastructure, and associated surface parking; nighttime events are only held during sporadic special events under existing conditions. As shown in the El Caballo Master Plan, under current conditions, five light poles are present in the northern portion of the Project site, just west of Save A Life Way, generally within the vicinity of the existing surface parking areas. One existing light pole is also located to the east of Save A Life Way, just south of the Humane Society. Refer to Figure 2-3, *Existing Conditions*.

Existing nighttime lighting in the surrounding area includes interior and exterior lighting associated with residential uses, as well as headlights from vehicles traveling along local roadways, including Valley Center Road, Beven Drive, Safe a Life Way, and Wohlford Drive. Limited nighttime lighting is also present at the adjacent Humane Society for purposes of security and public safety, as well as at the Hidden Valley Obedience Club and Mayflower Dog Park for operational purposes. No street lighting is present along Save A Life Way leading to the park. Streetlights are present along Beven Drive to the south and Valley Center Road to the east in the Project vicinity.

It is anticipated that the El Caballo Park facilities would generally operate from sunrise to sunset, with occasional special events extending into the evening hours (until 10:00 p.m.) several times per year. Park operations may ultimately be restricted by the lease agreement signed between the City and the lessee (i.e., Charros Association). Evening operations may also include occasional events held at the community hall (meetings, organized events).

All nighttime lighting would be kept to the minimum required to meet City lighting standards, park requirements, and to maintain public safety standards. It is anticipated that limited lighting would be provided in key areas around structures (restrooms, community building), in community gathering spaces, and along pathways, where required, as well as in surface parking areas; see Figure 2-5, *Proposed Master Plan*. As indicated in the Master Plan, nighttime lighting is not proposed to be installed at the large arena; however, lighting is proposed at the charreada arena to allow for occasional use of the arena during special events that extend into the evening.

To ensure that potential adverse effects are minimized or avoided, all future nighttime lighting installed would be in compliance with Municipal Code Article 35, Outdoor Lighting. As part of the environmental review process, the City would verify that final design plans comply with all applicable development standards to ensure that exterior lighting is properly designed and located. Nighttime Project lighting would be low-level lighting shielded and directed downward to reduce potential spillover or glare effects on adjacent properties, including adjacent native wildlife habitat and open space (i.e., Daley Ranch), and to avoid adverse effects on nighttime skies.

The proposed improvements would not include the incorporation of large expanses of glass or other reflective materials such as high gloss paints or metallic surfaces. It is therefore not anticipated that Project elements would result in potential adverse glare effects on surrounding properties.

With conformance to applicable City lighting and design regulations, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB). Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland 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?	☐	☐	☐	☒

DISCUSSION OF IMPACTS

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? **No Impact.***

According to available maps published by the California Department of Conservation (DOC 2022) as part of the Farmland Mapping and Monitoring Program, the Project site is designated Other Land. Other Land is land not included in any other farmland mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land (DOC 2025).

The Project site is generally located within an urbanized area of the City of Escondido and currently operates as a public park. The site is located within the General Plan land use designation of SPA 5 (Northeast Gateway SPA #5) and governed by the Northeast Gateway Specific Plan Area (SPA) with a zoning designation of S-P (Specific Plan Area). Based on such conditions, the Project site is not intended for agricultural use.

Furthermore, although a portion of the Project site was historically utilized for agricultural purposes (citrus orchards), based on a review of historical aerial photographs and maps, the orchards were removed in the early 1970s and the site was developed with equestrian uses (three new rodeo arenas) (Michael Baker 2025c). Since that time, the property has continued to support equestrian uses, similar to that which occurs under existing conditions, with additional equestrian-related improvements being constructed over time. The site has therefore not been used for agricultural production in approximately 50 years.

The Project would not result in the conversion of designated Farmland to a non-agricultural use. No impact would occur.

Mitigation Measures: No mitigation is required.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? **No Impact.***

As stated under Response 3.2(a), the site is zoned S-P (Specific Plan Area) and is therefore not intended for agricultural use. The site is not subject to a Williamson Act contract and no agricultural uses are present on or adjacent to the property (DOC 2023). The Project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. No impact would occur.

Mitigation Measures: No mitigation is required.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?* **No Impact.**

There are no lands zoned for forest or timber production on the Project site or within the City of Escondido limits. No impact would occur.

Mitigation Measures: No mitigation is required.

- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?* **No Impact.**

There are no designated forestlands on or adjacent to the Project site; therefore, the Project would not convert any such lands to non-forest uses. No impact would occur.

Mitigation Measures: No mitigation is required.

- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?* **No Impact.**

Refer to Responses 3.2(a) to 3.2(d) above. The Project site is not located within an agricultural use area and is within proximity to lands that support residential or commercial development, in addition to natural open space. It is not anticipated that improvement of the site as proposed would affect or encourage the conversion of any agricultural lands to a non-agricultural use or forestland to a non-forest use. No impact would occur.

Mitigation Measures: No mitigation is required.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The following discussion is based upon air quality modeling data prepared by Michael Baker International (2025a; see Appendix A).

DISCUSSION OF IMPACTS

- a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*
Less than Significant Impact.

Air quality plans describe air pollution control strategies to be implemented by a City, County, or regional air district. The primary purpose of an air quality plan is to bring an area that does not attain national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) into compliance pursuant to the Federal Clean Air Act and California Clean Air Act. NAAQS and CAAQS have been established for the following criteria pollutants: ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO_x), particulate matter less than 10 microns in diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), and lead.

The proposed Project is located within the San Diego Air Basin (Basin), which is governed by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing air quality plans for the Basin, specifically the State Implementation Plan (SIP) and the San Diego County Regional Air Quality Strategy (RAQS). The SIP and RAQS rely on information from the California Air Resources Board (CARB) and SANDAG, including mobile, area source emissions, and projected growth (CARB 2022; SDAPCD 2021a).

Based on the *County of San Diego Guidelines for Determining Significance* (Guidelines), if a project proposes development that is greater than that anticipated in the General Plan, the project may conflict with the RAQS (San Diego County 2007). The Project site is located within the Northeast Gateway Specific Plan Area (SPA) and currently has a land use designation of SPA 5 (Northeast Gateway SPA #5) and zoned S-P (Specific Plan Area). The Project site currently supports the existing park use and the proposed improvements and continued use of the park would not conflict with the existing zoning or land use designations. No changes to the existing zoning or General Plan land use designation would be required or proposed to allow for Project implementation.

The Guidelines determined that if a project exceeds the SANDAG growth forecast, the project would also conflict with the RAQS. Based on the SANDAG *Series 14 Regional Growth Forecast*, the City of Escondido has a projected population of 167,211 by 2050. This represents an increase of approximately 3,618 individuals from the baseline population estimate of 163,593 in 2025 (SANDAG 2021a). Additionally, based on the *Series 14 Regional Growth Forecast*, the City of Escondido has a projected employment of 82,806 jobs by 2050 which represents an employment increase of 6,721 jobs from the baseline employment of 76,085 in 2016. The proposed Project would not directly or indirectly induce population growth due to its nonresidential nature. Additionally, as a park use, the Project would require nominal number of employees, and the new jobs created on-site would result in a nominal indirect impact on population growth and housing demand, as these jobs are anticipated to be filled mostly by local residents of the City. As such, the Project would not result in a significant increase in population or employment; the Project would be consistent with the SANDAG growth forecast.

To determine if the Project would conflict or obstruct the RAQS, Project emissions are evaluated based on the quantitative emission thresholds established by the SDAPCD. As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 for the preparation of Air Quality Impact Assessments (AQIA). It should be noted that the SDAPCD's established thresholds for AQIA are also applicable in determining if a project would result in a significant air quality impact under CEQA. Table 3.3-1, *San Diego Air Pollution Control District Air Quality Significance Thresholds*, lists the thresholds established by the SDAPCD.

Table 3.3-1: San Diego Air Pollution Control District Air Quality Significance Thresholds

Pollutant	Total Emissions (pounds per day)
Particulate Matter (PM ₁₀)	100
Fine Particulate Matter (PM _{2.5})	55
Carbon Monoxide (CO)	550
Oxides of Nitrogen (NO _x)	250
Oxides of Sulfur (SO _x)	250
Lead and Lead Compounds	3.2
Volatile Organic Compounds (VOC)	75 ¹

Notes:

¹. VOC threshold is based on the threshold of significance for VOCs from the South Coast Air Quality Management District as stated in the San Diego County Guidelines for Determining Significance.

Source: County of San Diego, Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality, <https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf>.

As detailed in Response 3.3(b), the Project-generated air quality emissions would not exceed the SDAPCD's significance thresholds; refer to Table 3.3-3, *Project-Generated Construction Emissions*, and Table 3.3-4, *Project-Generated Operational Emissions*, below. Therefore, the Project would not conflict or obstruct implementation of the RAQS or SIP and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? **Less than Significant Impact.***

Criteria Pollutants

Air quality is a general description of how levels of air pollution and other atmospheric conditions can affect public health and the environment. Under the Federal Clean Air Act (CAA), the US Environmental Protection Agency (USEPA) has identified six air pollutants that are environmentally prevalent and produced by human activities to be of concern with respect to health, the environment and welfare of the public. These specific pollutants, known as criteria air pollutants, are pollutants for which the federal and state governments have established ambient air quality standards—or criteria—for outdoor concentrations to protect public health. These pollutants are common byproducts of human activities and have been documented through scientific research to cause various adverse health effect outcomes.

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

Ozone (O₃). O₃ occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O₃ layer) extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays. "Bad" O₃ is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen oxides (NO_x), and sunlight to form; therefore, VOCs and NO_x are O₃ precursors. To reduce O₃ concentrations, it is necessary to control the emissions of these O₃ precursors. Significant O₃ formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O₃ concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O₃ in the upper atmosphere (stratosphere) protects the earth from harmful ultraviolet radiation, high concentrations of ground-level O₃ (in the troposphere) can adversely affect the human respiratory system and other tissues. O₃ is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors,

children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O₃. Short-term exposure (lasting for a few hours) to O₃ at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO₂). NO_x are a family of highly reactive gases that are a primary precursor to the formation of ground-level O₃ and react in the atmosphere to form acid rain. NO₂ (often used interchangeably with NO_x) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO₂ occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO₂ can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO₂ concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO₂ may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM₁₀). PM₁₀ refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM₁₀ arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM₁₀ scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. Exposure to PM₁₀ would result in particles being deposited on the lung surface, causing tissue damage, lung inflammation, and impacting respiratory and cardiovascular health.

Fine Particulate Matter (PM_{2.5}). PM_{2.5} refers to suspended particulate matter, which is smaller than 2.5 microns. Due to the size of PM_{2.5}, these particles are more likely to be inhaled and deposited in the deeper parts of the lungs. Short-term exposure (up to 24 hours) would result in chronic bronchitis, asthma attacks, respiratory symptoms, and premature mortality.

Sulfur Dioxide (SO₂). Sulfur dioxide (SO₂) is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with SO_x. Exposure of a few minutes to low levels of SO₂ can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O₃ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOC is not considered a criteria pollutant; however, it is a precursor to O₃, which is a criteria pollutant. VOCs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms VOC and ROG (see below) are used interchangeably. Exposure to VOC

vapors would result in eyes, nose, and throat irritation, nausea, headaches, and damage to the liver, kidney, and central nervous system.

Reactive Organic Gases (ROG). Similar to VOCs, ROG are also precursors in forming O₃ and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and nitrogen oxides react in the presence of sunlight. ROG are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms ROG and VOC are used interchangeably. Exposure to ROG would result in the same adverse health effects as VOCs.

The attainment status for criteria pollutants in the Basin are listed in Table 3.3-2, *San Diego Air Pollution Control District Attainment Status*. As shown in Table 3.3-2, the Basin is in nonattainment for O₃, PM₁₀, and PM_{2.5}.

Table 3.3-2: San Diego Air Pollution Control District Attainment Status

Pollutant	California Attainment Status	Federal Attainment Status
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Nonattainment	Attainment ¹
Carbon Monoxide (CO)	Attainment	Attainment
Particulate Matter (PM ₁₀)	Nonattainment	Unclassifiable ²
Fine Particulate Matter (PM _{2.5})	Nonattainment	Attainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment

Notes:

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

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

Source: San Diego Air Pollution Control District, *Attainment Status*, <https://www.sdapcd.org/content/sdapcd/planning/attainment-status.html>.

Construction

The Master Plan is intended to provide a vision and implementation strategies for how the desired park improvements may be achieved. As indicated in Section 2.6, *Project Construction*, the Master Plan would be implemented in up to eight phases (Phases 1-6 including Phases 1A, 1B, 2A, and 2B) over time as funding is identified. As the specific implementation schedule is presently unknown, a conservative approach for construction of the proposed improvements was assumed, with all improvements occurring within an approximate 2-year period; see also Table 3.3-3, *Project-Generated Construction Emissions*. However, such a scenario is unlikely to occur due to the lack of funding. It should also be noted that with an extended construction schedule (i.e., a 5- or 10-year period), emissions generated would be further reduced as compared to that discussed herein as construction activities would be less intensive, with emissions generated over a longer time period. Further, it is assumed that baseline air quality conditions in the region would continue to improve over future years due to ongoing regulatory requirements and their resulting effects. Refer also to Appendix A which includes the modeling inputs used in analyzing Project emissions.

Air pollutant emissions associated with construction of the proposed Project would be generated from the exhaust of construction equipment, soil hauling trucks, delivery trucks, and worker vehicles. Particulate matter emissions would result from soil movement and wind-blown dust from

disturbed surfaces, and organic pollutant emissions would result from painting. Construction of the proposed Project would include demolition, grading, building construction, paving, and architectural coating applications. Improvements to the Escondido Creek were assumed to require the export of approximately 8,900 cubic yards of soil export. The improvement would also require the removal and export of approximately 4,050 tons of concrete materials (Waste Removal USA 2025).

Exhaust emission factors for typical diesel-powered heavy equipment are based on the CalEEMod program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to Appendix A, *Air Quality/Energy/Greenhouse Gas Emissions Modeling Data*, for the CalEEMod outputs and results. Table 3.3-3, *Project-Generated Construction Emissions*, presents the Project's anticipated daily construction emissions.

Table 3.3-3: Project-Generated Construction Emissions

Construction Emissions ²	ROG (lbs/day) ¹	NO _x (lbs/day) ¹	CO (lbs/day) ¹	SO ₂ (lbs/day) ¹	PM ₁₀ (lbs/day) ¹	PM _{2.5} (lbs/day) ¹
Year 1 Maximum Daily Emissions	3.00	27.2	29.0	0.08	5.38	2.56
Year 2 Maximum Daily Emissions	1.18	8.59	12.9	0.02	0.37	0.26
SDAPCD Thresholds	75	250	550	250	100	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: lbs = pounds

1. Emissions were calculated using CalEEMod version 2022.1. The higher emissions between summer and winter were presented as a conservative analysis.
2. Modeling assumptions include compliance with SDAPCD Rule 55 which requires watering exposed surfaces and using secured tarps or cargo covering for outbound trucks.

Source: Michael Baker 2025a; see Appendix A.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, excavation and construction is expected to be short-term and would cease upon Project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM₁₀ generated as a part of fugitive dust emissions. PM₁₀ poses a serious health hazard alone or in combination with other pollutants. PM_{2.5} is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. PM_{2.5} is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly

emitted or are formed in the atmosphere from the combustion of gases such as NO_x and sulfur oxides (SO_x) combining with ammonia. PM_{2.5} components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The Project would implement required dust control techniques as listed in SDAPCD Rule 55 (i.e., daily watering, secured tarps, soil binders, track-out grates) and adhering to permitted construction hour to reduce PM₁₀ and PM_{2.5} concentrations. Pursuant of SDAPCD Rule 55, if any track-out from construction activities is required to be removed, only certified PM₁₀ efficient street sweepers certified to meet the South Coast Air Quality Management District Rule 1186 requirements would be used. As demonstrated in Table 3.3-3, the total PM₁₀ and PM_{2.5} emissions would not exceed the SDAPCD thresholds during construction. Thus, PM₁₀ and PM_{2.5} emissions impacts associated with Project construction would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the Project site, employee commutes to the Project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table 3.3-3, construction equipment and worker vehicle exhaust emissions (i.e., ROG/VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}) would not exceed the established SDAPCD thresholds for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG/VOC Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG/VOC emissions, which are O₃ precursors. ROG/VOC emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SDAPCD Rule 67.0.1, all architectural coatings for the proposed structures would be required to have VOC contents of paint not exceeding 50 grams per liter (SDAPCD 2021b). ROG/VOC emissions associated with the proposed Project would be less than significant; refer to Table 3.3-3.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, A

General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report (2000), serpentinite and ultramafic rocks are not known to occur within the Project area. Thus, no impacts would occur in this regard.

Operation

Long-term operational air quality impacts consist of mobile source emissions generated from Project-related traffic and emissions from stationary area and energy sources. As a conservative analysis, emissions from the existing uses on-site were not modeled or deducted from Project-generated emissions. The proposed Project would revitalize the existing park through various improvements. However, CalEEMod assumes that the proposed Project would construct a new park, which presents a more conservative estimate on emissions. Emissions associated with each of these sources are detailed in Table 3.3-4, *Project-Generated Operational Emissions*, and discussed below.

Table 3.3-4: Project-Generated Operational Emissions

Project Summer or Winter Emissions	Emissions Source	ROG (lbs/day) ¹	NO _x (lbs/day) ¹	CO (lbs/day) ¹	SO _x (lbs/day) ¹	PM ₁₀ (lbs/day) ¹	PM _{2.5} (lbs/day) ¹
Summer	Mobile	0.94	0.64	7.35	0.02	1.85	0.48
Summer	Area	0.54	<0.01	0.07	< 0.01	<0.01	< 0.01
Summer	Energy	<0.01	0.02	0.01	<0.01	<0.01	<0.01
Summer	Total Summer Emissions²	1.48	0.66	7.43	0.02	1.85	0.48
Summer	SDAPCD Threshold	75	250	550	250	100	55
Summer	Threshold Exceeded?	No	No	No	No	No	No
Winter	Mobile	0.93	0.70	6.87	0.02	1.85	0.48
Winter	Area	0.53	0.00	0.00	0.00	0.00	0.00
Winter	Energy	<0.01	0.02	0.01	<0.01	<0.01	<0.01
Winter	Total Winter Emissions²	1.46	0.72	6.88	0.02	1.85	0.48
Winter	SDAPCD Threshold	75	250	550	250	100	55
Winter	Threshold Exceeded?	No	No	No	No	No	No

Notes: lbs = pounds

1. Emissions were calculated using CalEEMod version 2022.1.

2. Numbers may be slightly off due to rounding.

Source: Michael Baker 2025a; see Appendix A.

Area Source Emissions

Area source emissions would be generated due to consumer products, architectural coating, and landscaping. Pursuant of SDAPCD Rule 67.0.1, architectural coating would be limited to a VOC content of 50 grams per liter. As shown in Table 3.3-4, area source emissions during both summer and winter would not exceed established SDAPCD thresholds. Impacts would be less than significant in this regard.

Energy Source Emissions

Energy source emissions would be generated because of energy usage associated with the proposed Project. The primary use of electricity would be lighting for the proposed parking lots. Additionally, it is anticipated that any on-site buildings would use electricity and/or natural gas for

space heating and cooling, water heating, ventilation, lighting, appliances, and electronics, as deemed appropriate. As applicable, the Project would meet Title 24 standards. Energy source emissions would not exceed established SDAPCD thresholds; refer to Table 3.3-4. Impacts would be less than significant.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG/VOC, NO_x, SO_x, PM₁₀, and PM_{2.5} are all pollutants of regional concern (NO_x and ROG/VOC react with sunlight to form O₃ [photochemical smog], and wind currents readily transport SO_x, PM₁₀, and PM_{2.5}). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions were estimated using CalEEMod. The proposed Project would generate 60 average daily trips on weekdays and 272 average daily trips on weekends (Michael Baker 2025f). As shown in Table 3.3-4, mobile source emissions for both summer and winter would not exceed established SDAPCD thresholds. Therefore, impacts in this regard would be less than significant.

Total Operational Emissions

As shown in Table 3.3-4, the total operational emissions for both summer and winter would not exceed established SDAPCD thresholds. Therefore, impacts in this regard would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O₃ precursors, VOCs and NO_x, affect air quality on a regional scale. Health effects related to O₃ are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating Project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

CEQA allows lead agencies to rely on standards and guidance promulgated by other agencies. As such, this analysis utilizes guidance developed by the South Coast Air Quality Management District (SCAQMD) as an expert agency regarding air quality and its health effects. The SCAQMD noted in its *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and [Proposed] Brief of Amicus Curiae* (SCAQMD Amicus Brief 2015) for the Supreme Court of California decision for *Sierra Club vs. County of Fresno (Friant Ranch L.P.)*, that it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Furthermore, as noted by the San Joaquin Valley Air Pollution Control District (SJVAPCD) in the *Application for Leave to File Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and*

Respondent, County of Fresno and Real Party of Interest and Respondent, Friant Ranch, L.P (April 13, 2015), currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects from O₃, as an example, is correlated with the increases in ambient level of O₃ in the air (concentration) that an individual person breathes. The SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O₃ levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_x and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O₃ levels at its highest monitored sites by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O₃-related health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Project would not exceed SDAPCD's thresholds for construction and operational air emissions, the Project would have a less than significant air quality health-related impact.

Cumulative Impacts

If emissions exceed the thresholds shown in Table 3.3-1 for nonattainment pollutants (O₃, with O₃ precursors NO_x and VOCs, PM₁₀, and PM_{2.5}), the Project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant impact on the ambient air quality. However, as shown in Table 3.3-3 and Table 3.3-4, Project emissions would not exceed the significance thresholds and therefore would not result in a cumulatively significant increase of any nonattainment criteria pollutant. As such, the Project's contribution to cumulative impacts would also be less than significant.

Mitigation Measures: No mitigation is required.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*
Less than Significant Impact.

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, daycare centers, and places of worship. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest sensitive receptors to the Project site are single-family residential dwellings to the south of the Project site, approximately 100 feet away. As demonstrated below, the Project would result in less than significant impacts to these residents during Project construction and operation.

Construction

Project construction may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or Hazardous Air Pollutants (HAPs). The Project construction activities are anticipated to involve the operation of diesel-powered equipment, which

would emit Diesel Particulate Matter (DPM). In 1998, the CARB identified diesel exhaust as a Toxic Air Contaminant (TAC). Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed.

The closest sensitive receptors are single-family residential dwellings approximately 100 feet south of the nearest point of the Project site. Health impacts on sensitive receptors associated with exposure to DPM from Project construction are anticipated to be less than significant, since construction activities are expected to occur well below the 30-year exposure period used in health risk assessments. Additionally, construction activities associated with the proposed Project would occur throughout the approximately 20-acre park site and would not be concentrated near sensitive receptors for an extended period of time. Further, construction activities would be required to comply with regulations pertaining to BMPs intended to reduce construction emissions (e.g., reducing construction idling time, maintenance of construction equipment, limiting vehicle speeds). Additionally, emissions would be short-term and intermittent in nature, and therefore would not generate TAC emissions at high enough exposure concentrations to represent a health hazard. As such, impacts would be less than significant in this regard.

Operation

SDAPCD Regulation XII establishes acceptable risk levels and emission control requirements for new and modified facilities that may emit additional TACs. Under SDAPCD Rule 1210, emissions of TACs that result in a cancer risk of 10 in 1 million or less and a health hazard index of one or less would not be required to notify the public of potential health risks. The proposed Project would result in very limited operational activities that could result in emissions (such as landscaping maintenance), which has low potential health risks and emissions of TACs. SDAPCD Regulation XII would not apply to the Project as the development is not a facility that would generate TACs. As such, operation of the proposed Project is not expected to result in an elevated cancer risk to nearby sensitive receptors and impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (e.g., adversely affecting residents, school children, hospital patients, and the elderly).

The Basin is designated as an attainment area for the federal and state CO standards; refer to Table 3.3-2. There has been a decline in CO emissions even though vehicle miles traveled (VMT) on U.S. urban and rural roads have increased; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions (USEPA n.d.). Three major control programs have contributed to the reduced per-vehicle CO emissions, including exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD *CEQA Air Quality Handbook*,³ a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 parts per million (ppm), which is the 8-hour California ambient air quality standard. The closest CO monitoring station to the Project site is the San Diego – Rancho Carmel Drive station, which is located approximately 12.2 miles south of the Project site. The maximum CO concentration at San Diego – Rancho Carmel Drive station was measured at 1.7 ppm in 2024 (CARB 2024). Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hotspot would not occur at the Project site. Therefore, CO hotspot impacts would be less than significant.

Mitigation Measures: No mitigation is required.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? **Less than Significant Impact.***

According to the *Odor Complaints, Health Impacts, and Monitoring Methods* prepared for CARB, odors typically come from industrial facilities (CARB 2019). The primary industries that tend to lead to odors include wastewater treatment plants, municipal solid waste landfills, trash transfer stations, composting facilities, animal agriculture, chemical and petroleum industries, and roadkill collection facilities.

As shown in Figure 2-3, *Existing Conditions*, prevailing winds in the site vicinity are generally from the south and west. Although winds may traverse the property, due to the generally isolated location of the park and limited nature of the equestrian uses, odors from on-site operations are not considered to be a nuisance under existing conditions.

The proposed Project is intended to enhance the existing equestrian facilities and to allow for similar ongoing use of the property, and is not anticipated to substantially increase the potential for adverse odor effects. Under current conditions, the park supports equestrian-related activities (i.e. practices, events, lessons) that occur on a daily and/or weekly basis. Horseback riders also frequently routinely use the off-site trails in the adjacent Daley Ranch Preserve. The Humane Society located adjacent to the north of the Project site also involves animal keeping operations. Therefore, the Project would not introduce a new land use not already present that could generate odors.

The proposed Project would construct new facilities and/or enhance existing on-site facilities dedicated for equestrian use (i.e., corrals, arenas, muck storage, wash racks, staging area, horse trailer parking, trails). Any animal waste produced during on-site activities would therefore generally be concentrated within the equestrian use areas (arenas, corrals) in the northwestern portion of the site, west of Save A Life Way; refer to Figure 2-5, *Proposed Master Plan*. A large number of horses would not typically be present on-site on a daily basis. Rather, events where a greater number of animals may be present (i.e., organized events) would be periodic and short-term, and would operate similar to that which occurs under existing conditions.

Further, equestrian operations on-site would continue to be distanced from substantial populations or surrounding sensitive land uses with Project implementation. Open space lands of

3 CEQA allows the lead agency (City) to rely on standards and guidance used by other agencies. The SDAPCD does not have an established Air Quality Guideline to address this threshold and as such, guidance established by the SCAQMD is used for this project.

the Daley Ranch Preserve adjoin the site to the north/northwest, with the City of Escondido Water Treatment Plant to the west/southwest. Existing residential uses are further to the south/southeast of the site, across Beven Drive, approximately 100 feet from the proposed southern boundary of the park. However, such uses would be distanced from the on-site areas where equestrian activities would occur, with the Mayflower Dog Park, Hidden Valley Obedience Club, and Escondido Creek further buffering such equestrian uses from off-site sensitive receptors.

In California, routine animal waste is considered a non-hazardous, non-toxic solid waste, rather than a hazardous waste. The SDAPCD regulates odors, including those associated with animal waste, via nuisance-odor regulations rather than animal-specific odor standards. Rule 51 (Public Nuisance) as enforced by the SDAPCD prohibits emissions (including odors) that “injure, disturb, or endanger the public’s comfort, health, or safety.” Odor complaints, as regulated under Rule 51, allow SDAPCD to investigate and issue violations if odors are determined to create a public nuisance; however, the SDAPCD has not adopted specific, measurable odor thresholds pertaining to animal operations.

The City of Escondido Police Department, Animal Services Division, handles animal control, nuisance complaints, waste/sanitation issues related to animals, and enforcement of local and state animal regulations. Such oversight would further ensure that on-site operations do not result in potential adverse effects on surrounding uses.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by requiring equipment to be shut off when not in use or limiting idling time to no more than five minutes. Compliance with these existing regulations would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also be required to comply with the SDAPCD Rule 67.0.1, which would require VOC contents of paint to not exceed 50 grams per liter. Any construction odor impacts to existing adjacent land uses would be short-term and negligible. Additionally, the Project would be required to comply with SDAPCD Rule 51 which prohibits emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person.

Impacts resulting from other emissions (such as those leading to odors) adversely affecting a substantial number of people would be less than significant.

Mitigation Measures: No mitigation is required.

3.4 Biological Resources

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

The following discussion is based upon the *Biological Resources Assessment* prepared by Michael Baker International (2025b; see Appendix B).

DISCUSSION OF IMPACTS

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? **Less than Significant Impact with Mitigation Incorporated.***

The Project site lies within the San Diego County Multiple Habitat Conservation Program (MHCP) and the City of Escondido draft MHCP Subarea Plan used for implementing the MHCP conservation goals (Michael Baker 2025b). The western portion of El Caballo Park occurs within the hardline Focused Planning Area (FPA) of the MHCP; refer to Figure 3.4-1, *Vegetation Communities and Other Land Uses*.

Database searches were performed to identify special-status species with the potential to occur in the area. Database searches were performed on the following websites:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB)
- CNDDDB Special Animals List; Special Vascular Plants, Bryophytes, and Lichens List; State and Federally Listed Endangered, Threatened, and Rare Plants of California; and State and Federally Listed Endangered and Threatened Animals of California
- US Fish and Wildlife Service (USFWS) Critical Habitat Portal and Information for Planning and Consultation (IPaC) Trust Resource List
- USFWS National Wetlands Inventory
- US Department of Agriculture (USDA) National Resources Conservation Service (NRCS) Web Soil Survey
- California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Plants

Site Survey Results

A general biological resources survey and habitat assessment of the Project site was conducted on July 12, 2024, to document existing conditions and conduct a habitat assessment for special-status plant and wildlife species and sensitive natural communities, and to determine the potential presence of aquatic resources within the study area. Refer to Figure 3.4-1, *Vegetation Communities and Other Land Uses*.

Habitats and Vegetation Communities

The study area supports the following land cover types: Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, mule fat scrub, coast live oak woodland, Arundo-dominated riparian, eucalyptus woodland, disturbed habitat, and urban developed lands; refer to Table 3.4-1 below, and Figure 3.4-1, *Vegetation Communities and Other Land Uses*.



Legend

- Reference Point
- Project Site
- Study Area (300-ft Buffer)
- MHCP Focused Planning Area
- Escondido Creek
- 11300 Disturbed Habitat - DH (12.63 Acres)
- 12000 Urban/Developed - UD (29.38 Acres)
- 32500 Diegan Coastal Sage Scrub - DCSS (11.91 Acres)
- 37120 Southern Mixed Chaparral - SMC (7.23 Acres)
- 42200 Non-Native Grassland - NNG (0.42 Acres)
- 63310 Mule Fat Scrub - MFS (0.37 Acres)
- 65100 Arundo-Dominated Riparian - AR (0.69 Acres)
- 71160 Coast Live Oak Woodland - CLOW (0.59 Acres)
- 79100 Eucalyptus Woodland - EW (1.53 Acres)



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Table 3.4-1: Vegetation Communities and Land Cover Types

Vegetation Community/Land Cover Type	Project Site (Acres)	Study Area (Acres)
Diegan Coastal Sage Scrub	2.64	12.41
Southern Mixed Chaparral	0.09	8.14
Non-native Grassland	0.00	0.42
Mule Fat Scrub	0.37	0.37
Coast Live Oak Woodland	0.00	0.59
Arundo-dominated Riparian	0.42	0.89
Eucalyptus Woodland	1.41	1.53
Disturbed Habitat	12.01	12.59
Urban Developed	3.15	27.56
Total	20.10	64.51

Source: Michael Baker 2025b; see Appendix B.

Avoidance of MHCP vegetation communities, particularly vegetation communities that occur within the FPA, would be a primary consideration during final Project design and implementation. The Project would have the potential to result in significant impacts to sensitive habitat and/or vegetation communities, including Arundo-dominated riparian, Diegan coastal sage scrub, and southern mixed chaparral. If complete avoidance is infeasible due to site constraints, compensatory mitigation for impacts would be required. Impacts on the Arundo-dominated riparian community would be addressed through coordination with the regulatory agencies, but would require no net loss.

Critical Habitat

Under the US Endangered Species Act (ESA), critical habitat is designated at the time of listing of a species. Critical habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not.

In the event that a project may result in take or adverse modification to a listed species' designated critical habitat, a project proponent may be required to engage in suitable mitigation. However, consultation for impacts to critical habitat is only required when a project has a federal nexus. This may include projects that occur on federal lands, require federal permits (e.g., Clean Water Act [CWA] Section 404 permit), or receive any federal oversight or funding (including grant funding). If there is a federal nexus, the federal agency responsible for providing funds or permits would be required to consult with the USFWS under the ESA.

Critical habitat (Diegan coastal sage scrub) for the coastal California gnatcatcher (CAGN) occurs within the western portion of the Project site (refer to Appendix A of Appendix B) and suitable habitat for the species is also present just south of El Caballo Park. As designed, the Project has a potential for the loss or adverse modification of such critical habitat, and therefore, a significant impact may occur. Focused studies would be required to determine if the Project site is occupied by the coastal CAGN at the time when future improvements are undertaken in this area and final Project design details are available. Formal consultation with the USFWS would be necessary for

any impacts to occupied critical habitat (Diegan coastal sage scrub, 2.64 acres) and may require additional mitigation. As a signatory to the MHCP, the City has pre-mitigated but has partial take coverage for CAGN. Formal consultation would ensure the proper consistency review and additional mitigation per the City's MHCP Subarea Plan. The consistency review would be triggered following certification of the CEQA document.

Special-Status Species

Candidate, sensitive, or special-status species are commonly characterized as species that are at a potential risk or actual risk to their persistence in a given area or across their native habitat. These species have been identified and assigned a status ranking by governmental agencies such as the CDFW and USFWS, and private organizations such as CNPS. The degree to which a species is at risk of extinction is the determining factor in the assignment of a status ranking. Some common threats to a species' or population's persistence include habitat loss, degradation, fragmentation, human conflict, and intrusion. Special-status species are defined by the following codes:

- Listed, proposed, or candidates for listing under the federal Endangered Species Act (50 Code of Federal Regulations [CFR] 17.11;
- Listed or proposed for listing under the California Endangered Species Act (Fish and Game Code [FGC] 1992 Section 2050 et seq.; 14 CCR Section 670.1 et seq.); and,
- Species that meet the definition of rare or endangered under CEQA (14 CCR Section 15380), including CNPS List Rank 1b and 2.

Special-Status Plant Species

One special-status species, Engelmann oak, was observed near the edge of the westernmost portion of the study area, but was not observed on the Project site. Five special-status species from adjacent Daley Ranch may be expected to occur in the study area based on the presence of suitable habitat within the Diegan coastal sage scrub and southern mixed chaparral: delicate clarkia, summer holly, Palmer's goldenbush, mesa horkelia, and Robinson's peppergrass. There are also 25 additional special-status plant species with a moderate potential to occur based on the presence of suitable habitat in the study area. Refer to Appendix D, Table D1, of Appendix B for a summary of special-status plant species with the potential to occur in the study area.

Impacts to special-status plant species may be significant depending on the species, quantity, and local/regional rarity, and if suitable habitat cannot be avoided. If focused surveys determine presence at the time when construction of specific improvements are undertaken, and significant impacts cannot be avoided, consultation with the CDFW would be required in addition to mitigation. Results of the consultation with CDFW may result in development of a mitigation and monitoring plan and replacement of habitat at a minimum 1:1 ratio as directed by the MHCP.

Special-Status Wildlife Species

Two special-status wildlife species were observed during the field survey: orange-throated whiptail (state Species of Special Concern, or SSC) and yellow warbler (SSC). Therefore, there is a potential for these species to be impacted during vegetation removal activities.

The following four species are expected to occur based on the known geographic distributions, presence of suitable habitat, and connectivity to local extant populations: southern California rufous-crowned sparrow (Watchlist [WL]), Bell's sage sparrow (WL), San Diegan tiger whiptail (SSC), and coastal CAGN (federally threatened [FT], SSC, WL). Removal of Diegan coastal sage scrub at the southern end of El Caballo Park with Project improvements may therefore have the potential to impact these species, if present.

Sixteen species also have a moderate potential to occur due to presence of suitable habitat, including two listed species—least Bell's vireo (federally endangered [FE], state endangered [SE], SSC) and Crotch's bumble bee (state candidate endangered)—and two special-status bat species—pallid bat (SSC) and western mastiff bat (SSC)—and may be affected by the proposed Project. Least Bell's vireo was recorded in 2016 in portions of Escondido Creek that occur upstream of the study area, and the Arundo-dominated riparian community provides low to moderate quality habitat for the species. Crotch's bumble bee has the potential to forage on native flowers within the study area (Michael Baker 2025b).

Potential impacts on orange-throated whiptail and yellow warbler are expected to be less than significant under CEQA with implementation of preconstruction nesting bird surveys; no focused surveys would be required for these species. Focused studies for coastal CAGN, Crotch's bumble bee, and least Bell's vireo would be necessary at the time when improvements are undertaken to determine species presence and level of impacts, as such effects on federally and state-listed species would trigger a significant impact under CEQA. In addition, avoidance, minimization, or compensatory mitigation in the form of habitat preservation and consultation with the USFWS and/or CDFW would be necessary. Special-status bats could potentially roost on the Project site in gum trees; depending on the species, impacts may be significant and would also require additional study and mitigation, as appropriate.

The remaining species from the CNDDDB and IPaC online databases are not expected to occur on the Project site due to a lack of suitable habitat. Table 3.4-2, *Special-Status Wildlife Species - Potential to Occur*, identifies the special-status wildlife species in the study area and their potential to occur. As the improvements identified in the Master Plan would be phased over time when funding becomes available, on-site conditions may need to be confirmed. Final design details of the various Master Plan components, when available, would determine the precise nature and extent of potential impacts to biological resources and associated mitigation requirements. Mitigation measures **BIO-1** to **BIO-9** have been identified to ensure that potential impacts on biological resources are reduced with Project implementation.

With incorporation of mitigation measures **BIO-1** to **BIO-9**, the Project would not have the potential to have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Impacts would be reduced to less than significant.

Table 3.4-2: Special-Status Wildlife Species - Potential to Occur

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Accipiter cooperii</i>	Cooper's hawk	None/WL IUCN_LC-Least Concern	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats often near water	Not expected to occur. No suitable habitat is present.
<i>Agelaius tricolor</i>	tricolored blackbird	None/SSC, ST/BLM_S-Sensitive IUCN_EN-Endangered NABCI_RWL-Red Watch List USFWS_BCC-Birds of Conservation Concern	Nests near freshwater, emergent wetland with cattails or tules, but also in Himalayan blackberry; forages in grasslands, woodland, and agriculture	Not expected to occur. No suitable habitat is present.
<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow	None/WL	Nests and forages in open coastal scrub and chaparral with low cover of scattered scrub interspersed with rocky and grassy patches	Expected. Species could nest in scrub and chaparral habitat in Project vicinity.
<i>Anaxyrus californicus</i>	arroyo toad	FE/SSC IUCN_EN-Endangered	Semi-arid areas near washes, sandy riverbanks, riparian areas, palm oasis, Joshua tree, mixed chaparral and sagebrush; stream channels for breeding (typically third order); adjacent stream terraces and uplands for foraging and wintering	Not expected to occur. No suitable habitat is present.
<i>Anniella stebbinsi</i>	southern California legless lizard	None/SSC/USFS_S-Sensitive	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and moist sandy or loose, loamy soils	Not expected. Scrub and chaparral habitat is dense. CNDDB record from the 1950s has species associated with Escondido Creek which is now a concrete-lined channel.
<i>Antrozous pallidus</i>	pallid bat	None/SSC/BLM_S-Sensitive IUCN_LC-Least Concern USFS_S-Sensitive WBWG_H-High Priority	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in man-made structures and trees	Moderate potential to occur. Species could potentially roost in trees in the study area.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Aquila chrysaetos</i>	golden eagle	None/FP, WL/BLM_S-Sensitive CDF_S-Sensitive IUCN_LC-Least Concern	Nests and winters in hilly, open/semi-open areas, including shrublands, grasslands, pastures, riparian areas, mountainous canyon land, open desert rimrock terrain; nests in large trees and on cliffs in open areas and forages in open habitats	Not expected to occur. No suitable habitat is present.
<i>Arizona elegans occidentalis</i>	California glossy snake	None/SSC	Arid scrub, rocky washes, grasslands, chaparral, open areas with loose soil	Moderate potential to occur in chaparral and sage scrub habitats.
<i>Artemisiospiza belli belli</i>	Bell's sage sparrow	None/WL	Nests and forages in coastal scrub and dry chaparral; typically in large, unfragmented patches dominated by chamise; nests in more dense patches but uses more open habitat in winter	Expected. Species could nest in scrub and chaparral habitat in Project vicinity.
<i>Aspidoscelis hyperythra</i>	orange-throated whiptail	None/WL/ IUCN_LC-Least Concern USFS_S-Sensitive	Low-elevation coastal scrub, chaparral, and valley-foothill hardwood	Present. Species was observed on the Project site during field survey.
<i>Aspidoscelis tigris stejnegeri</i>	San Diegan tiger whiptail	None/SSC/None	Hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.	Expected. Species may occur in scrub and chaparral habitat in Project vicinity.
<i>Athene cunicularia</i>	burrowing owl	None/SSC/BLM_S-Sensitive IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	Not expected to occur. Although there are some open areas present in the study area, these areas were under active construction.
<i>Bombus crotchii</i>	Crotch bumble bee	None/CE/IUCN_EN-Endangered	Open grassland and scrub communities supporting suitable floral resources.	Moderate potential for foraging in the study area.
<i>Bombus pensylvanicus</i>	American bumble bee	None/None/IUCN_VU-Vulnerable	Coastal prairie Great Basin grassland Valley & foothill grassland	Not expected to occur. No suitable habitat is present.
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	FE/None/IUCN_EN-Endangered	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. No clay soils are present and no depressional areas that could support a vernal pool were observed.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Buteo swainsoni</i>	Swainson's hawk	None/ST/BLM_S-Sensitive IUCN_LC-Least Concern	Nests in open woodland and savanna, riparian, and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields and pasture	Not expected to occur. No suitable habitat is present.
<i>Campylorhynchus brunneicapillus sandiegensis</i>	coastal cactus wren	None/SSC USFS_S-Sensitive USFWS_BCC-Birds of Conservation Concern	Southern cactus scrub patches	Moderate. There is a potential for suitable habitat within patches of the chaparral and sage scrub.
<i>Chaetodipus californicus femoralis</i>	Dulzura pocket mouse	None/SSC	Open habitat, coastal scrub, chaparral, oak woodland, chamise chaparral, mixed-conifer habitats; disturbance specialist; 0 to 3,000 feet above mean sea level	Moderate potential to occur in chaparral and sage scrub habitat.
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	None/SSC	Coastal scrub, mixed chaparral, sagebrush, desert wash, desert scrub, desert succulent shrub, pinyon-juniper, and annual grassland	Moderate potential to occur in chaparral and sage scrub habitat.
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT/SSC/None	On coasts nests on sandy marine and estuarine shores; in the interior nests on sandy, barren or sparsely vegetated flats near saline or alkaline lakes, reservoirs, and ponds	Not expected to occur. No suitable habitat is present.
<i>Coccyzus americanus occidentalis</i>	western yellow-billed cuckoo	FT/SE/BLM_S-Sensitive NABCI_RWL-Red Watch List USFS_S-Sensitive	Nests in dense, wide riparian woodlands and forest with well-developed understories	Not expected to occur. No suitable habitat is present.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None/SSC/BLM_S-Sensitive IUCN_LC-Least Concern USFS_S-Sensitive WBWG_H-High Priority	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, man-made structures, and tunnels	Not expected to roost or forage in the study area.
<i>Crotalus ruber</i>	red diamondback rattlesnake	None/SSC/ USFS_S-Sensitive IUCN_LC-Least Concern	Coastal scrub, chaparral, oak and pine woodlands, rocky grasslands, cultivated areas, and desert flats	Moderate potential to occur in chaparral and sage scrub habitat.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Danaus plexippus plexippus pop. 1</i>	monarch - California overwintering population	FC/None/IUCN_LC-Least Concern USFS_S-Sensitive	Closed-cone coniferous forest, wind-protected tree groves with nectar sources and nearby water sources; Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico.	Not expected to occur. No suitable habitat is present.
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	FE/ST/IUCN_EN-Endangered	Annual and perennial grassland habitats, coastal scrub or sagebrush with sparse canopy cover, or in disturbed areas	Not expected to occur. Habitat in the study area is dense. Soils in disturbed areas have compacted soils.
<i>Empidonax traillii extimus</i>	southwestern willow flycatcher	FE/SE/NABCI_RWL-Red Watch List	Nests in dense riparian habitats along streams, reservoirs, or wetlands; uses variety of riparian and shrubland habitats during migration	Not expected to occur. No suitable habitat is present.
<i>Emys marmorata</i>	western pond turtle	None/SSC/BLM_S-Sensitive IUCN_VU-Vulnerable USFS_S-Sensitive	Slow-moving permanent or intermittent streams, ponds, small lakes, and reservoirs with emergent basking sites; adjacent uplands used for nesting and during winter	Not expected to occur. No suitable habitat is present.
<i>Ensatina eschscholtzii klauberi</i>	large-blotched salamander	None/WL USFS_S-Sensitive	Moist and shaded evergreen and deciduous woodlands	Not expected to occur. No native woodlands present.
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC/BLM_S-Sensitive WBWG_H-High Priority	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	Moderate potential to occur and forage or roost within habitat in the study area.
<i>Gila orcuttii</i>	arroyo chub	None/SSC/AFS_VU-Vulnerable USFS_S-Sensitive	Warm, fluctuating streams with slow-moving or backwater sections of warm to cool streams at depths >40 centimeters (16 inches); substrates of sand or mud	Not expected to occur. Escondido Creek does not provide substrate or vegetative cover.
<i>Icteria virens</i>	yellow-breasted chat	None/SSC IUCN_LC-Least Concern	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush	Moderate. Potential habitat for foraging and nesting is present within the willows associated with the arundo-riparian scrub.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Ixobrychus exilis</i>	least bittern	None/SSC IUCN_LC-Least Concern	Nests in freshwater and brackish marshes with dense, tall growth of aquatic and semi-aquatic vegetation	Not expected to occur. No suitable habitat is present.
<i>Lasionycteris noctivagans</i>	silver-haired bat	None/None/IUCN_LC-Least Concern WBWG_M-Medium Priority	Old-growth forest, maternity roosts in trees, large snags 50 feet aboveground; hibernates in hollow trees, rock crevices, buildings, mines, caves, and under sloughing bark; forages in or near coniferous or mixed deciduous forest, stream or river drainages	Not expected to occur due to lack of suitable habitat.
<i>Lasiurus frantzii</i>	western red bat	None/SSC IUCN_LC-Least Concern WBWG_H-High Priority	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy	Not expected to occur. No suitable habitat is present.
<i>Lasiurus xanthinus</i>	western yellow bat	None/SSC/None	Valley–foothill riparian, desert riparian, desert wash, and palm oasis habitats; below 2,000 feet above mean sea level; roosts in riparian and palms	Not expected to occur due to lack of suitable habitat.
<i>Laterallus jamaicensis coturniculus</i>	California black rail	None/FP, ST/BLM_S-Sensitive IUCN_NT-Near Threatened NABCI_RWL-Red Watch List	Tidal marshes, shallow freshwater margins, wet meadows, and flooded grassy vegetation; suitable habitats are often supplied by canal leakage in Sierra Nevada foothill populations	Not expected to occur due to lack of suitable habitat.
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	None/SSC/None	Arid habitats with open ground; grasslands, coastal scrub, agriculture, disturbed areas, and rangelands	Moderate potential to occur within scrub habitat.
<i>Myotis ciliolabrum</i>	western small-footed myotis	None/None/BLM_S-Sensitive IUCN_LC-Least Concern WBWG_M-Medium Priority	Arid woodlands and shrublands, but near water; roosts in caves, crevices, mines, abandoned buildings	Not expected to occur due to lack of suitable habitat.
<i>Myotis evotis</i>	long-eared myotis	None/None/BLM_S-Sensitive IUCN_LC-Least Concern WBWG_M-Medium Priority	Brush, woodland, and forest habitats from sea level to 9,000 feet above MSL; prefers coniferous habitats; forages along habitat edges, in open habitats, and over water; roosts in buildings, crevices, under bark, and snags; uses caves as night roosts	Moderate potential to roost in gum trees on the Project site.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Myotis yumanensis</i>	Yuma myotis	None/None/BLM_S-Sensitive IUCN_LC-Least Concern WBWG_LM-Low-Medium Priority	Riparian, arid scrublands and deserts, and forests associated with water (streams, rivers, tinajas); roosts in bridges, buildings, cliff crevices, caves, mines, and trees	Not expected to occur due to lack of suitable habitat.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	None/SSC	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	Moderate potential to occur. Suitable habitat present in chaparral and scrub habitat.
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	None/SSC IUCN_LC-Least Concern WBWG_M-Medium Priority	Pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oases; roosts in high cliffs or rock outcrops with drop-offs, caverns, and buildings	Not expected to occur due to lack of suitable habitat.
<i>Nyctinomops macrotis</i>	big free-tailed bat	None/SSC IUCN_LC-Least Concern WBWG_MH-Medium-High Priority	Rocky areas; roosts in caves, holes in trees, buildings, and crevices on cliffs and rocky outcrops; forages over water	Not expected to occur due to lack of suitable habitat.
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	None/SE/USFWS_BCC-Birds of Conservation Concern	Nests and forages in coastal saltmarsh dominated by pickleweed (<i>Salicornia</i> spp.)	Not expected to occur. No suitable habitat is present.
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	FE/SSC	fine-grained sandy substrates in open coastal strand, coastal dunes, and river alluvium	Not expected to occur due to lack of suitable habitat.
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC/BLM_S-Sensitive IUCN_LC-Least Concern	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats	Moderate potential to occur. Suitable habitat present in chaparral and scrub habitat.
<i>Plegadis chihi</i>	white-faced ibis	None/WL IUCN_LC-Least Concern	Nests in shallow marshes with areas of emergent vegetation; winter foraging in shallow lacustrine waters, flooded agricultural fields, muddy ground of wet meadows, marshes, ponds, lakes, rivers, flooded fields, and estuaries	Not expected to occur due to lack of suitable habitat.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Plestiodon skiltonianus interparietalis</i>	Coronado skink	None/WL/BLM_S-Sensitive	Woodlands, grasslands, pine forests, and chaparral; rocky areas near water	Moderate potential to occur in chaparral habitat.
<i>Polioptila californica californica</i>	coastal California gnatcatcher	FT/SSC/NABCI_YWL-Yellow Watch List	Nests and forages in various sage scrub communities, often dominated by California sagebrush and buckwheat; generally avoids nesting in areas with a slope of greater than 40%; majority of nesting at less than 1,000 feet above mean sea level	Expected. Species could nest in sage scrub within the study area. Species was recorded on the Project site in 2001 (CNDDDB 2024). Project also occurs within species' Critical Habitat.
<i>Pyrgus ruralis lagunae</i>	Laguna Mountains skipper	FE/None/None	Restricted to montane meadows of Laguna Mountains and Mount Palomar	Not expected to occur. No suitable habitat is present.
<i>Pyrocephalus rubinus</i>	vermillion flycatcher	None/SSC IUCN_LC-Least Concern	Nests in riparian woodlands, riparian scrub, and freshwater marshes; typical desert riparian with cottonwood, willow, mesquite adjacent to irrigated fields, ditches, or pastures	Not expected to occur. This species is not expected to nest in the study area as it's more commonly associated with landscapes with adjacent pasture lands.
<i>Rallus obsoletus levipes</i>	Ridgway's rail	FE/FP, SE NABCI_RWL-Red Watch List	Coastal wetlands, brackish areas, coastal saline emergent wetlands	Not expected to occur. No suitable habitat is present.
<i>Rana muscosa</i>	mountain yellow-legged frog	FE/SE, WL IUCN_EN-Endangered USFS_S-Sensitive	Lakes, ponds, meadow streams, isolated pools, and open riverbanks; rocky canyons in narrow canyons and in chaparral	Not expected to occur. No suitable habitat is present.
<i>Salvadora hexalepis virgulata</i>	coast patch-nosed snake	None/SSC	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	Moderate potential within scrub habitats in the study area.
<i>Setophaga petechia</i>	yellow warbler	None/SSC	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	Moderate. Potential habitat for foraging and nesting is present within the arundo-riparian scrub.
<i>Spea hammondi</i>	western spadefoot	FPT/SSC/BLM_S-Sensitive IUCN_NT-Near Threatened	Primarily grassland and vernal pools, but also in ephemeral wetlands that persist at least 3 weeks in chaparral, coastal scrub, valley-foothill woodlands, pastures, and other agriculture	Not expected to occur due to lack of suitable habitat.

Table 3.4-2, continued

Scientific Name	Common Name	Status (Federal/State/Other)	Habitats	Potential to Occur in Study Area
<i>Sternula antillarum browni</i>	California least tern	FE/FP, SE/IUCN_EN-Endangered	Forages in shallow estuaries and lagoons; nests on sandy beaches or exposed tidal flats	Not expected to occur. No suitable habitat is present.
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	FE/None/IUCN_EN-Endangered	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. No suitable habitat is present.
<i>Taxidea taxus</i>	American badger	None/SSC/IUCN_VU-Vulnerable	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils	Not expected to occur. Scrub habitat in the study area was dense and not suitable for species.
<i>Thamnophis hammondi</i>	two-striped gartersnake	None/SSC	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	Not expected to occur. No suitable habitat is present.
<i>Vireo bellii pusillus</i>	least Bell's vireo	FE/SE/BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern NABCI_YWL-Yellow Watch List USFS_S-Sensitive	Nests and forages in low, dense riparian thickets along water or along dry parts of intermittent streams; forages in riparian and adjacent shrubland late in nesting season	Moderate. Potential habitat for foraging and nesting is present within the willows associated arundo-riparian scrub.

Special-Status Wildlife Species Designations for Table 3.4-2

Federal	State	Other
FE: Federally listed as endangered FT: Federally listed as threatened FPE: Federally proposed for listing as endangered FPT: Federally proposed for listing as threatened FC: Federal candidate species (former Category 1 candidates) FPD: Federally proposed for delisting BCC: U.S. Fish and Wildlife Service Bird of Conservation Concern BLM: Bureau of Land Management Sensitive Species USFS: U.S. Forest Service Sensitive Species DL: Delisted	SE: State listed as endangered ST: State listed as threatened SCE: State candidate for listing as endangered SCT: State candidate for listing as threatened SCD: State candidate for delisting SSC: California Species of Special Concern FP: California Fully Protected Species WL: California Watch List Species CDF: California Department of Forestry Sensitive Species DL: Delisted	San Diego MHCP Carlsbad Subarea List 2: Species coverage contingent on other MHCP Subarea plans being permitted List 3: Species coverage contingent upon funding for management of conserved areas NE: Narrow Endemic Species

Mitigation Measures:

BIO-1 Avoidance of Multiple Habitat Conservation Program Sensitive Vegetation Communities. During each final design phase, and prior to ground-disturbing activities, a qualified biologist shall assess (via survey or other methods) the potential area of disturbance for each Project component to be undertaken in order to determine whether the Project component has the potential to impact sensitive vegetation communities. Avoidance of Multiple Habitat Conservation Program vegetation communities (i.e., Diegan coastal sage scrub and southern mixed chaparral), particularly vegetation communities that occur within the Focused Planning Area, shall be a primary consideration during final design and implementation of Project components. Impacts on the Arundo-dominated riparian community shall be addressed through coordination with the regulatory agencies [see mitigation measure BIO-10] but shall require no net loss. If complete avoidance of Multiple Habitat Conservation Program vegetation communities is infeasible through final Project design, compensatory mitigation for impacts shall be required as provided below. The mitigation bank at Daley Ranch can be used to fulfill compensatory mitigation requirements. Refer to the table below for mitigation required for impacts to each vegetation community.

Environmentally Sensitive Habitats	Project Site Location: Impacts Within the Focused Planning Area*	Project Site Location: Impacts Outside the Focused Planning Area*
Arundo-dominated riparian	1:1 or 2:1 (no net loss)	1:1 or 2:1 (no net loss)
Diegan coastal sage scrub	2:1	1:1
Southern mixed chaparral	1:1	0.5:1

*Mitigation ratios in this table were generated from Table 4-6 and Table 4-7 of the MHCP.

Timing/Implementation: During final design of each Project component; prior to ground-disturbing activities

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

BIO-2 Rare Plant Focused Survey. Prior to any ground-disturbing activities, a preconstruction rare plant survey for Palmer's golden bush, mesa horkelia, summer holly, delicate clarkia, and Robinson's peppergrass shall be conducted by a qualified biologist during the blooming period (see table below) to determine if species are present, as well as location and quantity, and whether Project improvements would impact such species. If any of these plant species are observed and impacts (including a 100-foot buffer around the plants) cannot be avoided, the City shall coordinate with the California Department of Fish and Wildlife to implement compensatory mitigation in the form of seed collection by a qualified botanist and replanting at an off-site location (i.e., Daley Ranch) at a minimum 1:1 replacement ratio. If rare plant species are determined to be absent, no mitigation is required.

Species	Blooming period
Palmer's goldenbush (CNPS 1B.1)	September - November
Mesa horkelia (CNPS 1B.1)	February - July
Summer holly (CNPS 1B.2)	April - June
Delicate clarkia (CNPS 1B.2)	April - June
Robinson's peppergrass CNPS 4.3)	January - July

Timing/Implementation: Prior to ground-disturbing activities

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

BIO-3 Coastal California Gnatcatcher Focused Survey and Permitting. During each final design phase, and prior to vegetation removal or ground disturbance, a qualified biologist shall assess (via survey or other methods) the potential area of disturbance for each Project component to be undertaken in order to identify and evaluate current conditions for coastal California gnatcatcher and whether the Project component has the potential to impact coastal California gnatcatcher habitat. If removal of suitable habitat or critical habitat for coastal California gnatcatcher cannot be avoided through final design, a focused survey by a biologist with a 10(a)(1)(A) permit from the US Fish and Wildlife Service shall be required. A three-visit focused survey following the US Fish and Wildlife Service Coastal California Gnatcatcher Presence/Absence Survey Protocol shall be conducted.

If the species is present and would be impacted by the Project, as implemented by phase, habitat removal shall be restricted from March 15 to June 30 to ensure no breeding individuals are affected. Since the Multiple Habitat Conservation Program Subarea Plan has not yet been approved by California Department of Fish and Wildlife and US Fish and Wildlife Service, consultation with the wildlife agencies shall occur to ensure the Project is consistent with the Multiple Habitat Conservation Program and an incidental take permit specifying compensatory mitigation requirements shall be obtained from the wildlife agencies. Any grading activities, vegetation removal, or staging shall occur in conformance with the permit conditions. Mitigation for loss of habitat may be achieved in coordination with mitigation measure BIO-1.

Timing/Implementation: During final design of each Project component; prior to ground-disturbing activities or vegetation removal

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

BIO-4 Least Bell's Vireo Focused Survey and Permitting. During each final design phase, and prior to ground disturbance or vegetation removal activities, a qualified biologist shall assess (via survey or other methods) the potential area of disturbance for each Project component to be undertaken in order to identify and evaluate current conditions for least Bell's vireo and whether the Project component has the potential to impact least Bell's vireo habitat. If removal of suitable habitat for least Bell's vireo

cannot be avoided through final design, a focused survey shall be conducted. If the species is deemed present and construction activities would occur during the breeding season (March 15 to September 15), the City shall obtain an incidental take permit from the US Fish and Wildlife Service and California Department of Fish and Wildlife prior to proceeding with disturbance to the habitat. The incidental take permit shall include requirements for compensatory or other mitigation, as specified by the regulatory agencies, which shall occur at a minimum 1:1 replacement ratio.

Timing/Implementation: During final design of each Project component; prior to ground-disturbing activities or vegetation removal

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

- BIO-5** **Crotch's Bumble Bee Surveys and Monitoring.** A preconstruction survey for Crotch's bumble bee shall be conducted by a qualified biologist no more than three days prior to commencement of any ground-disturbing activities related to each Project component undertaken. If bumble bees are observed, the presence of a biological monitor during initial vegetation removal shall be required to ensure no bumble bees are harmed.

Timing/Implementation: Prior to ground-disturbing activities; during vegetation removal

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

- BIO-6** **Special-status Bat Surveys.** Prior to any on-site tree removal, if removal is to occur during the maternity (March–September) or winter (November–February) seasons, a bat survey to determine the presence of a maternity/winter roost shall be required. If a roost is found, the City shall consult with the California Department of Fish and Wildlife for avoidance methods for eviction (outside of maternity and winter season), or other monitoring requirements.

If tree removal activities commence 30 days or more following the initial bat survey, a qualified bat biologist shall conduct a preconstruction survey to determine if bats are actively roosting in trees two days prior to tree removal to reconfirm absence.

Timing/Implementation: Prior to tree removal

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

- BIO-7** **Nesting Bird Surveys.** A nesting bird survey shall be conducted by a qualified biologist within seven days prior to ground-disturbing or vegetation removal activities associated with Project implementation (or Project phase) to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present and could be directly or indirectly impacted by the proposed Project. If active nests are found, the biologist shall establish an appropriate construction exclusion buffer zone, based on site conditions, species, and activity, that

shall remain in place until the nest is vacated and juveniles have fledged or the biologist otherwise determines that construction may resume.

Timing/Implementation: Prior to ground-disturbing or vegetation removal activities; during construction

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

- BIO-8 Worker Environmental Awareness Training.** Prior to any Project staging or construction activities, a qualified biologist shall conduct a Worker Environmental Awareness Training program for Project and construction personnel. The training shall include a description of the special-status species of concern and their habitats; general provisions of the federal Endangered Species Act and California Endangered Species Act; penalties associated with violating the provisions of the acts; measures being implemented for species conservation; and identification of any environmentally sensitive areas to be avoided.

Timing/Implementation: Prior to staging or construction activities

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

- BIO-9 Biological Construction Monitoring.** Prior to commencement of ground-disturbing or vegetation removal activities, a qualified biologist experienced with identification of the sensitive and common biological resources in the region (biological monitor) shall be retained by the City. The biologist shall be present to monitor all initial ground-disturbing and vegetation-clearing activities occurring with construction of each Project component. The biological monitor shall perform biological clearance surveys at the start of each workday when ground-disturbing activities shall take place to minimize impacts on special-status species. The monitor shall be responsible for ensuring that impacts to special-status species are avoided to the maximum extent practicable. Monitoring shall continue as necessary and at the biologist's discretion to maintain protective measures and to monitor for species potentially in harm's way. These protection measures may include redirecting wildlife to areas outside the work area. Biological monitoring shall take place until vegetation-clearing activities have ceased.

Timing/Implementation: Prior to commencement of ground-disturbing and vegetation removal activities; during construction

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

Level of Significance after Mitigation: Less than significant.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? **Less than Significant Impact with Mitigation Incorporated.***

Ten natural communities considered sensitive by the CDFW were reported for the study area in the CNDDDB: maritime succulent scrub; San Diego mesa claypan vernal pool; southern coast live oak riparian forest; southern coastal salt marsh; southern cottonwood willow riparian forest; southern maritime chaparral; southern riparian forest; southern riparian scrub; southern sycamore alder riparian woodland; and southern willow scrub. The site survey conducted did not identify any of the sensitive natural communities listed by the CNDDDB (Michael Baker 2025b).

However, the MHCP and draft MHCP Subarea Plan identify several vegetation communities in the study area, including Diegan coastal sage scrub, southern mixed chaparral, riparian scrub (i.e., Arundo-dominated riparian), non-native grassland, and coast live oak woodland; refer to Table 3.4-1. Of these, Diegan coastal sage scrub (2.64 acres), riparian scrub (0.42 acre), and southern mixed chaparral (0.09 acre) occur within the Project site. These communities are considered environmentally sensitive under the MHCP and Subarea Plan.

If sensitive habitats in the FPA cannot be avoided or on-site conservation cannot be established, impacts to sensitive vegetation communities within the FPA would require off-site mitigation on land inside an FPA or a conservation bank (i.e., Daley Ranch). Impacts to these communities outside of the FPA would also require mitigation, but at a lower ratio (minimum of 1:1).

Impacts to riparian habitat or other sensitive natural communities would occur with Project implementation. Mitigation measures **BIO-1**, **BIO-8**, and **BIO-9** would be incorporated to reduce potential Project impacts to less than significant.

Mitigation Measures:

Implement mitigation measures **BIO-1**, **BIO-8**, and **BIO-9**.

Level of Significance after Mitigation: Less than significant.

- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means? **Less than Significant Impact with Mitigation Incorporated.***

Three agencies regulate activities within streams, wetlands, and riparian areas in California. The USACE Regulatory Branch regulates discharge of dredged or fill material into “waters of the U.S.” pursuant to Section 404 of the CWA and Section 10 of the Rivers and Harbors Act. Of the state agencies, the RWQCB regulates discharges to surface waters pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act, and the CDFW regulates alterations to streambed and associated riparian habitat under FGC Section 1600 et seq.

Based on a review of aerial photographs, USGS 7.5-minute quadrangle maps, USFWS National Wetlands Inventory maps, and observations made during the field survey, several drainage features within and in the immediate vicinity of the Project site were identified. Escondido Creek is an existing concrete-lined channel that conveys flows from north to south through the Project area. An earthen/concrete-lined drainage originating at the northwestern portion of El Caballo Park conveys flows eastward into Escondido Creek. The National Wetlands Inventory also maps both riverine and freshwater forested/shrub wetland features on-site.

The presence of two drainage features and riparian habitat, all of which may be subject to USACE, RWQCB, or CDFW jurisdiction, was confirmed during the July 2024 site survey. At the time when specific improvements are proposed and final engineering design details are available, a formal aquatic resources delineation would be required to determine the jurisdictional limits for each regulatory agency. Impacts to any regulated drainage features may be considered significant and would require coordination with the regulatory agencies to obtain the appropriate permits and establish mitigation requirements.

As there is no net loss of wetlands allowed pursuant to Executive Order 11990 (Protection of Wetlands) and the MHCP, any impacts to federally regulated wetlands and riparian habitat, including their biological function and values, would require full replacement. The MHCP requires mitigation at a ratio of 1:1 to 2:1 based on coordination with the regulating agencies. Mitigation measure **BIO-10** would be implemented to reduce potential impacts to jurisdictional resources.

Project implementation would have the potential to have a substantial adverse effect on state or federally protected wetlands. Mitigation measure **BIO-10** would reduce impacts to less than significant.

Mitigation Measures:

BIO-10 Aquatic Resources Jurisdictional Delineation and Permits. Prior to any disturbance of jurisdictional aquatic resources within El Caballo Park or Escondido Creek, the City shall acquire aquatic permits from the regulating agencies (US Army Corps of Engineers, San Diego Regional Water Quality Control Board, and California Department of Fish and Wildlife) and mitigate for permanent and temporary impacts on waters of the US, waters of the state, and state streambed and associated riparian habitat. A jurisdictional delineation and impact analysis shall be prepared in support of the permit applications. This shall include preparation of a Habitat Mitigation and Monitoring Plan for any on-site restoration activities. Mitigation shall occur at a ratio of 1:1 to 2:1 based on coordination with the regulating agencies. The Habitat Mitigation and Monitoring Plan shall be reviewed and approved by the US Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife and all permit conditions shall be adhered to.

Timing/Implementation: Prior to and during construction impacting any jurisdictional aquatic resources

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

Level of Significance after Mitigation: Less than significant.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? **Less than Impact with Mitigation Incorporated.***

Native bird species and their nests are protected under the Migratory Bird Treaty Act (MBTA) of 1918 (16 United States Code 703-712). The MBTA implements international treaties between the United States and other nations devised to protect migratory birds, their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. The state of California has incorporated the protection of birds of prey in FGC Sections 3800, 3513, and 3503.5. All raptors and their nests are protected from take or disturbance under the MBTA (16 United States Code Section 703 et seq.) and California statute (FGC Section 3503.5).

Wildlife corridors link areas of suitable habitat that are otherwise separated by areas of non-suitable habitat such as rugged terrain, changes in vegetation, or human disturbance. Fragmentation of open space areas by urbanization creates “islands” of wildlife habitat that are isolated from each other; corridors help to mitigate the effects of this fragmentation by allowing animals to move between remaining habitats; providing escape routes from fire, predators, and human disturbances; and serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and shelter.

The Project site borders the southern limits of Daley Ranch, a preserve that provides over 3,000 acres of habitat for native plant and wildlife species. South and east of the Project site are existing residential areas and future residential uses. Escondido Creek also bisects the Project site, and although this is a linear feature that could be used by mammal species to traverse the area, it does not currently provide vegetative cover for live-in habitat or connect habitat areas.

The Project site does not support a habitat linkage or wildlife corridor. Existing El Caballo Park may function as a buffer between existing conservation lands and urban developed lands but does not serve as a habitat linkage or wildlife corridor (Michael Baker 2025b). Buffer zones may serve to lessen the effect urban landscapes have on sensitive habitats, thereby protecting sensitive landscapes or conservation areas.

However, there is potential for migratory and nesting birds to be impacted by Project activities. Although no nesting birds were identified during the field survey, conditions could change by the time Project construction activities begin. Direct and/or indirect impacts may therefore occur during Project construction if a nest is physically disturbed or destroyed, or if breeding or nesting activities are disrupted or cease due to noise or increased human activity. Mitigation measures **BIO-7** to **BIO-9** are proposed to ensure that direct and indirect impacts to migratory species are reduced to a level of less than significant.

Mitigation Measures:

Implement mitigation measures **BIO-7** to **BIO-9**.

Level of Significance after Mitigation: Less than significant.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? **Less than Significant Impact with Mitigation Incorporated.***

City Municipal Code Section 33-1068.B, Restrictions on Removal of Vegetation, requires City approval of a vegetation removal permit for the removal of vegetation (i.e., mature trees, protected trees, and sensitive biological habitat) on developed and undeveloped lots two acres or larger 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.

The Project site currently supports a variety of mature trees; see Figure 2-3, *Existing Conditions*. As shown in Figure 2-5, *Proposed Master Plan*, some removal of existing trees and other vegetation on-site would be required to accommodate the proposed improvements.

Landscaping proposed with the Project includes native plants found in the Southern California region integrated with non-native plant material consisting of the lawn play areas and proposed fruit trees. Planting materials would include a mixture of trees such as western redbud, sycamore, Fremont cottonwood, California live oak, Goodding's willow, red willow, and arroyo willow, along with shrubs, grasses, and other ground covers (City of Escondido 2014).

City of Escondido Municipal Code Sections 33-1068.C and 33-1069 regulate impacts to mature and protected trees.⁴ Any mature tree that would be removed would be replaced at a 1:1 ratio and any protected tree that would be removed would be replaced at a 2:1 ratio. A tree inventory has not been conducted to date but would be required for Project implementation. The number, size, and species of the replacement trees would be subject to approval by the Director of Development Services, ensuring the Project would satisfy the tree replacement ratio requirements. Mitigation measure **BIO-11** would be implemented to require preparation and approval of a tree survey to document existing on-site tree conditions; a tree replacement and/or protection plan; tree and/or vegetation removal permit; and a revegetation plan for new native trees being planted on-site.

With implementation of mitigation measure **BIO-11**, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be reduced to less than significant with mitigation incorporated.

Mitigation Measures:

- BIO-11** **Tree Inventory and Vegetation Removal Permit.** Prior to any grading or vegetation removal, a vegetation removal permit shall be obtained from the City pursuant to Zoning Code Section 33-1068.B. The vegetation removal permit shall include a site plan showing the location and type of existing plants, trees, and sensitive biological

⁴ "Mature tree" is any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree (genus *Quercus*), shall have a diameter four inches or greater when measured at four and one-half (4½) feet DBH above the tree's natural grade. All other mature trees shall have a diameter of eight inches DBH, or greater, for a single stem or one of the multiple stems. "Protected tree" is any oak (genus *Quercus*) which has a 10 inch or greater DBH, or any other species or individual specimen listed on the local historic register or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code.

habitat areas, locations for all existing and proposed buildings or improvements on the property, and the specific area to be cleared.

The permit shall be accompanied by a tree survey that includes the location, dripline, and trunk diameter at breast height of all mature or protected trees. Additionally, a tree report documenting tree health, impact on the tree (i.e., proposed for removal or preservation), method of removal, and relocation site (if applicable) shall be included. A tree replacement and/or protection plan shall also be prepared in accordance with the Escondido Zoning Code tree replacement standards. The plan shall estimate the health of trees and identify impacts to tree(s) (i.e., preserved, removed, or relocated) and include specifications for transplanting and maintenance of the affected and/or new trees. Any mature tree that would be removed shall be replaced at a 1:1 ratio; any protected tree that would be removed shall be replaced at a 2:1 ratio.

All tree-related documents shall be prepared by a professional International Society of Arboriculture Certified arborist. This documentation shall be submitted to the Director of Development Services for review and approval, and any additional conditions shall be implemented.

Prior to any vegetation removal or grading, a revegetation plan including a plant palette, methods for planting, performance standards, irrigation, and maintenance requirements shall also be prepared for review and approval by the City Director of Development Services. The use of native plantings (i.e., trees, shrubs, plants) shall be required to avoid the potential for indirect encroachment into adjoining native habitat to remain and to reflect the native environment.

Timing/Implementation: Prior to grading and/or vegetation removal; during construction

Enforcement/Monitoring: City of Escondido Development Services Department - Planning Division

Level of Significance after Mitigation: Less than significant.

- f) *Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? **Less than Significant Impact with Mitigation Incorporated.***

The Project site lies within the San Diego MHCP and the draft City of Escondido MHCP Subarea Plan, which is used for implementing the MHCP conservation goals. The western portion of El Caballo Park lies within the hardline FPA of the MHCP. Hardline areas are specific areas where land is designated for permanent conservation and habitat management. Development within hardline areas is generally not permitted, as they serve as the core of the preserve system. Refer also to Appendix A of Appendix B.

Vegetation communities in the Project study area that are considered environmentally sensitive under the San Diego MHCP and draft City of Escondido MHCP Subarea Plan include Diegan sage scrub, southern mixed chaparral, riparian scrub (i.e., Arundo-dominated riparian), non-native grassland, and coast live oak woodland. The draft Subarea Plan requires mitigation for Project

impacts to sensitive biological resources, including the potential impacts on Diegan coastal sage scrub (2.64 acres), southern mixed chaparral (0.09 acres), and riparian scrub (0.42 acres) within the Project site.

If sensitive habitats in the FPA cannot be avoided or on-site conservation established, impacts to sensitive vegetation communities within the FPA would require off-site mitigation on lands in an FPA or a conservation bank (i.e., Daley Ranch). Impacts to these communities outside of the FPA would also require mitigation, but at a lower ratio. Impacts to disturbed and developed landscapes would not require mitigation. Additionally, a vegetation removal permit issued by the City would be required for the clearing and removal of any trees or vegetation within areas affected by the proposed improvements. Mitigation measures **BIO-1** to **BIO-9** and **BIO-11** are proposed to reduce such impacts to less than significant levels.

Additionally, impacts on special-status plants and wildlife, if present, would be considered potentially significant. No focused studies have occurred to date. Mitigation for special-status plant and wildlife species may be achieved through the conservation of sensitive vegetation communities described above under Response 3.4(a).

Mitigation Measures:

Implement mitigation measures **BIO-1** to **BIO-9** and **BIO-11**.

Level of Significance after Mitigation: Less than significant.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

The following discussion is based on the *Phase 1 Cultural Resources Assessment for the El Caballo Park Project* prepared by Michael Baker International (2025c; see Appendix C).

DISCUSSION OF IMPACTS

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? **Less than Significant Impact with Mitigation Incorporated.***

To evaluate the potential for the presence of historical resources, Michael Baker International requested a records search at the South Coastal Information Center (SCIC) on June 10, 2024. The purpose of the records search was to determine the extent of previous surveys conducted within one-half mile radius of the Project site and whether previously documented pre-contact or historic-period archaeological sites, architectural resources, or traditional cultural properties exist within the area.

The records search results indicated that 23 previous cultural resources studies have been conducted within one half-mile of the Project area. Three of those previous studies cover portions of the proposed Project footprint. The records search also indicated that 14 cultural resources have been identified within the half-mile search radius of the Project area. None of the previously recorded cultural resources are within the proposed Project footprint. A search of the Sacred Lands File by the Native American Heritage Commission (NAHC) in June 2024 indicated that the results were negative, meaning that no resources have been documented on the Project site (Michael Baker 2025c).

An intensive pedestrian survey of the Project area was conducted on July 18, 2024. Based on the results of the survey and evaluation of the built environment, two cultural resources were identified and evaluated for eligibility to the National Register of Historic Places and the California Register of Historical Resources: Asociación de Charros de Escondido Arena and a series of historic period retaining walls associated with the Dixon family (MBI-El Caballo-01H).

Research indicates that the Asociación de Charros de Escondido Arena was built on the property once owned by James Franklin Dixon, whose family was one of the pioneering families of Escondido. The Asociación de Charros de Escondido Arena has been present on the Project site since approximately 1974 and is still used to support equestrian operations and events held on-site. Originally, three arenas were built to provide an outdoor recreational space for the charrería community, similar to other arenas built throughout California for this competitive sport (Michael Baker 2025c). However, two of the three arenas were dismantled by 2000; they have since been replaced. The structures in the still-extant arena (i.e., the subject arena) were built for the association to host charrería community events, which continue to this day (Michael Baker 2025c).

The Asociación de Charros de Escondido Arena was evaluated as ineligible for both the National Register and California Register. Therefore, it was recommended that this resource does not meet the criteria of a historic property as defined by 36 Code of Federal Regulations 800.16(l)(1); does not meet the criteria of a historical resource as defined by CEQA Section 15064.5(a); and does not meet the definition of a “unique archeological resource” as defined in PRC Section 21083.2. Based on such findings, no further evaluation was recommended (Michael Baker 2025c).

A series of four rock retaining wall features was also identified during the pedestrian survey and was temporarily designated as MBI-El Caballo-01H. The four terraced wall segments are located along a hillside west of Save A Life Way and appear to have been used to prevent erosion and to support citrus crops and a dirt road near the edge of the hillside. This resource is assumed to be associated with the larger Dixon family farm property, which operated in the late 1800s and early 1900s in the vicinity. Foundational remnants of what was likely the Dixon family farmhouse remain visible today at the northwest corner of Beven Drive and Save A Life Way. As the location of the retaining wall features lie outside of the proposed Project footprint, the site boundaries for this resource were not fully delineated, nor was the site evaluated as part of the cultural resources study. The Project as proposed would therefore not impact this resource.

Based on the above findings, the Project would not disturb any known historical resources as defined under CEQA or historic properties as defined by Section 106 of the National Historic Preservation Act. The Project would not cause a substantial adverse change in the significance of a known historical resource pursuant to CEQA Guidelines Section 15064.5. Impacts would be less than significant in this regard.

There is also the potential for unknown buried historic sites or features on the site that may have been obscured by grading, earthwork, or various materials over the years. As unknown historical resources or properties may be present, Project construction activities could potentially result in a significant impact. Mitigation measures **CUL-1** to **CUL-3** would be implemented to require that a qualified archaeologist and Native American monitor be present on-site during Project ground-disturbing activities to reduce potential adverse effects on such unknown historical resources. Impacts would be reduced to less than significant levels with mitigation incorporated.

Mitigation Measures:

CUL-1 Archaeological and Native American Monitoring. An archaeological monitor meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology (48 Federal Register 44738) and a Native American monitor representing one of the consulting tribes shall be present during ground-disturbing activities for the

Project, including, but not limited to, site clearing, grubbing, boring, trenching, grading, excavation, and demolition of building foundations, or until the archaeological monitor, in consultation with the Native American monitor, determines monitoring is no longer necessary (e.g., initial ground disturbance is complete, soils are sterile for cultural resources) and may reduce monitoring frequency or cease monitoring altogether.

The archaeological and Native American monitor shall log all monitoring activity and provide monitoring logs to the City on a bi-weekly basis during the active construction phase. If a discovery is made, the archaeological monitor shall notify the City of the finding within 24 hours by email and/or phone. Additional work may be required in accordance with the terms specified in the cultural resources monitoring and discovery plan.

At the completion of grading, excavation, and ground-disturbing activities on the site, a final compiled monitoring report shall be submitted to the City that documents monitoring activities conducted by the archaeological and Native American monitors within 60 days of completion of monitoring. The report shall document impacts to any known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; and, in a confidential appendix, include the monitoring logs. The final monitoring report shall be submitted to the City, the South Coast Information Center, and any consulting tribes.

Timing/Implementation: Prior to, during, and upon completion of Project construction

Enforcement/Monitoring: City of Escondido Development Services Department

CUL-2 **Unanticipated Discoveries.** If a potentially significant archaeological resource is unearthed during excavation activities, work shall stop immediately within 100 feet of the find and the discovery shall be evaluated by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738) in consultation with the tribal monitor, pursuant to the procedures set forth at California Environmental Quality Act Guidelines Section 15064.5. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan and excavation. Any archaeological testing plan or further investigation shall be consulted on with the affiliated tribe(s) identified through state-mandated consultation. If the resource is determined not significant, no further work is needed. The preferred approach shall be to preserve the resource in place; if the resource cannot be preserved in place, an alternative solution shall be identified through consultation between the City and the affiliated consulting tribe(s).

If the find is deemed to be potentially significant, the City shall make a determination of significance on the basis of the recommendations of the affiliated consulting tribe(s) and the qualified archaeologist. The City shall engage in consultation with the affiliated tribe(s) to identify avoidance, minimization, and mitigation for the impacts to the significant resource, and if applicable, to its final disposition.

The consulting tribe(s) shall be notified within 24 hours of the discovery via email and phone. The developer shall concurrently provide the City with written evidence of notification to the consulting tribe(s). The consulting tribe(s) shall be allowed access to the discovery, in order to assist with the significance evaluation. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan and excavation.

Timing/Implementation: Prior to, during, and upon completion of Project construction

Enforcement/Monitoring: City of Escondido Development Services Department

CUL-3 **Inadvertent Discovery of Human Remains.** If human skeletal remains are found, those remains shall require proper treatment in accordance with State of California Health and Safety Code Sections 7050.5-7055. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are discovered during excavation of a site. As required by state law, the requirements and procedures set forth in Public Resources Code Section 5097.98 would be implemented, including notification of the County coroner, notification of the Native American Heritage Commission, and consultation with the individual tribe identified by the Native American Heritage Commission to be the “most likely descendant.” If human remains are found during excavation, excavation shall halt within the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains.

Timing/Implementation: Prior to, during, and upon completion of Project construction

Enforcement/Monitoring: City of Escondido Development Services Department

Level of Significance after Mitigation: Less than significant.

b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? **Less than Significant Impact with Mitigation Incorporated.***

The Project area lies within the coastal plain and foothills of the Peninsular Ranges. Although channeled under current conditions, Escondido Creek runs through the Project site and likely served as a source of water for tribes occupying the area. Portions of the site historically supported agricultural activities, with grading of the site occurring during the 1970s for construction of the El Caballo Park horse arenas noted above (Michael Baker 2025c).

No cultural resources have been previously identified on the Project site, and the search of the Sacred Lands File resulted in a negative finding. No precontact or ethnohistoric period Native American sites were identified during the pedestrian survey. Although portions of the site have been previously disturbed by agricultural activities, as well as developed with the present equestrian facilities, the proximity of known precontact archaeological sites, with the closest site being approximately 200 meters from the Project boundary, suggests the archaeological sensitivity of the Project area for precontact sites is moderate (Michael Baker 2025c). As the

proposed Project would have the potential to encounter unknown archaeological resources during Project ground-disturbing activities, a significant impact may occur.

Mitigation measures **CUL-1** to **CUL-3** are therefore proposed to require that, in the event of discovery of unknown cultural resources on-site, including human remains, proper measures are taken for the protection, evaluation, and documentation of such resources, as appropriate. Implementation of mitigation measures **CUL-1** to **CUL-3** would ensure that the Project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Impacts would be reduced to less than significant.

Mitigation Measures:

Implement mitigation measures **CUL-1** to **CUL-3**.

Level of Significance after Mitigation: Less than significant.

- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries? **Less than Significant Impact with Mitigation Incorporated.***

No human remains were identified in the Project area through the records search or field survey conducted as part of the archaeological assessment. However, unidentified human remains, whether as part of a prehistoric cemetery, an archaeological site, or an isolated occurrence, could be present below the ground surface.

If human remains are encountered during construction, the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e) require that work in the immediate area must halt, the remains must be protected, and the County coroner must be notified immediately. If the remains are determined to be Native American, then the NAHC must be notified (typically by the coroner) within 24 hours, as required by PRC Section 5097. The NAHC would identify and contact a most likely descendant, who would be given the opportunity to provide recommendations for the treatment of the remains within 48 hours of being granted access to the site. Mitigation measure **CUL-3** would ensure that such requirements are adhered to and that monitoring occurs during ground-disturbing activities. With implementation of mitigation measure **CUL-3**, potential impacts related to human remains would be reduced to less than significant.

Mitigation Measures:

Implement mitigation measure **CUL-3**.

Level of Significance after Mitigation: Less than significant.

3.6 Energy

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

The following discussion is based upon greenhouse gas emissions and energy consumption data prepared by Michael Baker International (2025a; see Appendix A).

Thresholds of Significance

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis of Response 3.6(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1:** The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- **Criterion 2:** The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3:** The effects of the project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4:** The degree to which the project complies with existing energy standards.
- **Criterion 5:** The effects of the project on energy resources.
- **Criterion 6:** The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the Project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2, 4, and 5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criteria 2, 4, and 6**, and the building energy demand analysis discusses **Criteria 2, 3, 4, and 5**.

DISCUSSION OF IMPACTS

- a) *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? **Less than Significant Impact.***

Project-Related Sources of Energy Consumption

This analysis focuses on three sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel for vehicle trips and off-road equipment associated with Project construction and operations. The analysis of operational electricity and natural gas usage is based on the California Emissions Estimator Model version 2022.1 (CalEEMod) modeling results for the Project. The Project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for San Diego County and consumption factors provided by San Diego Gas & Electric, the electricity and natural gas provider for the City and the Project site. The results of the CalEEMod modeling are included in Appendix A, *Air Quality/Energy/GHG Data*. The amount of operational fuel consumption was estimated using the California Air Resource Board's (CARB) EMFAC2021 website platform, which provides projections for typical daily fuel usage in the County, and the Project's annual vehicle miles traveled (VMT) based on the Project's 60 average daily trips on weekdays and 272 average daily trips on weekends (Michael Baker 2025f). The estimated construction fuel consumption is based on the Project's assumed construction equipment list, timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.

The Project's estimated energy consumption is summarized in Table 3.6-1, *Project and Countywide Energy Consumption*. As a conservative analysis, energy consumption from the existing uses on-site were not calculated or deducted from the Project's energy consumption. As shown in Table 3.6-1, the Project's energy usage would result in a 0.0005 percent increase over San Diego County's typical annual electricity consumption. The Project would also result in a 0.0001 percent increase over San Diego County's typical annual natural gas consumption. The Project's construction off-road, construction on-road (vehicle), and operational vehicle fuel consumption would increase the County's consumption by 0.2770 percent, 0.0030 percent, and 0.0023 percent, respectively (**CEQA Appendix F - Criterion 1**). Overall, the Project would result in a nominal energy consumption increase over the County's existing consumption. Therefore, the Project would not result in a significant increase in construction and operational energy consumption and impacts would be less than significant in this regard.

Table 3.6-1: Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption ¹	San Diego County Annual Energy Consumption ²	Percentage Increase Countywide
Electricity Consumption ³	103 MWh	19,102,000 MWh	0.0005%
Natural Gas Consumption	646 therms	533,000,000 therms	0.0001%
Construction Off-Road Fuel Consumption	41,465 gallons	14,969,985 gallons ⁴	0.2770%
Construction On-Road Fuel Consumption	32,567 gallons	1,092,254,937 gallons	0.0030%
Operational Automotive Fuel Consumption	22,598 gallons	990,190,924 gallons	0.0023%

MWh = megawatt hours

Notes:

1 As modeled in CalEEMod version 2022.1.

2 The Project's electricity consumption is compared to the total consumption in San Diego County in 2023, the latest year for which consumption data is available. The Project's construction and operational automotive fuel consumption is compared with the projected Countywide fuel consumption in 2028 and 2030, respectively (construction start year and the first year of operation).

San Diego County electricity consumption data source: California Energy Commission, *Electricity Consumption*, <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0>, accessed August 20, 2025.

San Diego County natural gas consumption data source: California Energy Commission, *Electricity Consumption*, <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1>, accessed August 20, 2025.

3 Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.

4 Countywide off-road fuel consumption is based on EMFAC Off-Road projections.

Source: Michael Baker 2025a; see Appendix A.

Construction

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coatings. Fuel energy consumed during construction would cease upon completion of construction and would not represent a significant demand for energy resources. In addition, some incidental energy conservation would occur during construction through compliance with state requirements that heavy-duty diesel equipment, not in use for more than five minutes, must be turned off. Project construction equipment would also be required to comply with the latest US Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**CEQA Appendix F - Criterion 4**).

The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and glass) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. As indicated in Table 3.6-1, the Project's fuel consumption from off-road construction equipment use would be approximately 41,465 gallons, which would increase fuel use in the County by 0.2770 percent.

Also indicated in Table 3.6-1, the Project's fuel consumption from on-road construction vehicle use would be approximately 32,567 gallons, which would increase fuel use in the County by 0.0030 percent. As such, construction would have a nominal effect on the local and regional energy supplies (**CEQA Appendix F - Criterion 2**). It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or state (**CEQA Appendix F - Criterion 5**). Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

Operations

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 3.6-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the Project site. According to the *El Caballo Park Master Plan Trip Generation Summary*, the proposed Project would generate 60 average daily trips on weekdays and 272 average daily trips on weekends (Michael Baker 2025f). As indicated in Table 3.6-1, Project operational daily trips are estimated to consume approximately 22,598 gallons of fuel per year, which would increase the County's automotive fuel consumption by 0.0023 percent, which is a nominal increase. The Project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**CEQA Appendix F - Criterion 2**).

The Project would include surface parking lots on the Project site. The proposed surface parking lot would be required to comply with Title 24 standards pertaining to electric vehicle (EV) capable spaces and parking stalls with EV chargers. As such, the Project would be required to provide EV spaces with chargers and EV-ready (future EV chargers) parking spaces. The Project would also include features such as 30 short-term bicycle parking spaces, which would encourage alternative modes of transportation. Additionally, a North County Transit District (NCTD) bus stop is located within 300 feet south of the Project site along East Valley Parkway. The Project would encourage and support the use of EVs and alternative modes of transportation, thus reducing petroleum fuel consumption (**CEQA Appendix F - Criterion 4** and **Criterion 6**).

Therefore, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The California Energy Commission (CEC) developed 2024–2040 forecasts for energy consumption and peak demand in support of the 2023 *Integrated Energy Policy Report* (IEPR) for each of the major electricity and natural gas planning areas and the state, based on the economic and demographic growth projections. The CEC forecasted that baseline electricity consumption grows at a rate of about 1.7 percent annually through 2040 (CEC 2024). The natural

gas consumption grows at a rate of about 0.2 percent annually through 2035.⁵ As shown in Table 3.6-1, the Project would represent a 0.0005 percent increase in electricity consumption over the current Countywide usage, which would be significantly below the CEC's forecasts and the current Countywide usage. The Project would also result in a 0.0001 percent increase over San Diego County's typical annual natural gas consumption, which is well below the CEC's forecasts. Therefore, the Project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**CEQA Appendix F - Criterion 2**). The Project would also consume energy during the same time periods as other surrounding land developments. As a result, the Project would not result in unique or more intensive peak or base period electricity demand (**CEQA Appendix F - Criterion 3**).

The Project would be required to comply with the most current version of Building Energy Efficiency Standards (commonly known as Title 24), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. The proposed community hall building within the Project would meet Title 24 standards for energy efficiency standards that are applicable at the time of Project implementation. Compliance with current Title 24 standards significantly reduces energy usage (**CEQA Appendix F - Criterion 4**).

Furthermore, the electricity provider, San Diego Gas & Electric, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources that are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance on such energy resources further ensures that new development projects will not result in the waste of the finite energy resources. The City of Escondido joined the Clean Energy Alliance (CEA) in 2023 (CEA 2025a). Since that time, the CEA has procured energy on behalf of the City. The CEA purchases the power, with San Diego Gas & Electric providing energy delivery services. The City has subscribed to the Clean Impact Plus program which offers 50 percent renewable/75 percent carbon-free energy content (CEA 2025b).

In compliance with Title 24, which includes the CALGreen standards (Title 24, Part 11), the Project would be required to install high efficiency lighting, energy-efficient appliances, and a solar ready roof. As a result, the Project would ensure that energy consumption is kept to a minimum through these components (**CEQA Appendix F - Criterion 5**).

Based on the discussion above, the Project would not result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

⁵ Based on the 2023 *Integrated Energy Policy Report*, the gas forecast is updated every two years, in odd years. As such, the natural gas consumption shown here is based on the California Energy Commission, *Final 2022 Integrated Energy Policy Report Update*, page 140, May 10, 2023.

- b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? **Less than Significant Impact.***

The Project would comply with the state and regional plans for renewable energy and energy efficiency. State and regional plans for renewable energy and energy efficiency include the CEC's IEPR, Title 24, Part 6 (Energy Code) standards, and CALGreen standards (Title 24, Part 11). The Project would meet Title 24 standards for energy efficiency and incorporate all applicable energy efficiency measures (solar-ready roof, high efficiency lighting, energy-efficient appliances, etc.). Compliance with Title 24 standards, which includes CALGreen, would ensure the Project's consistency with the IEPR building energy efficiency recommendations, which would further ensure Project conformance with the state's energy reduction goals. The Project would also comply with applicable energy goals and measures identified in the City's General Plan, as listed in Table 3.6-2, *Project Consistency with City of Escondido General Plan*.

Table 3.6-2: Project Consistency with City of Escondido General Plan

Policies and Measures	Project Consistency Analysis
Bicycle Network 4.3. Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.	Consistent. The proposed Project would include various improvements that improve the walkability of the site and alternative modes of transportation. Improvements include the addition of pedestrian and equestrian connections to existing trails, the construction of new bridges to allow bicycle and pedestrian access, installation of bicycle racks, and new trail pathways. The proposed Project would also include facilities such as a dog park, picnic tables, shade trees, and other recreational facilities that promote pedestrian walkability. As such, this feature would encourage the use of bicycles and walking as alternative forms of transportation. The Project would be consistent with this policy.
Energy Policy 16.2. Continue to work with local utility providers to ensure that adequate electricity and natural gas services and facilities are available for new and existing development.	Consistent. The proposed Project would utilize services by San Diego Gas & Electric, the natural gas and electricity provider for the City. As discussed above, the Project would not result in a substantial increase in energy demand and would be adequately accommodated by these services. The Project is consistent with this policy.
Energy Policy 16.3. Implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities.	Consistent. Existing trails within the vicinity of the Project site include El Caballo Trail, as well as other trails within Daley Ranch, and the Escondido Creek Trail, which runs adjacent to the Escondido Creek channel. The Master Plan would improve the Escondido Creek Trail, providing pedestrians and cyclists with an entry into the park.
Energy Policy 16.4. Encourage site and building design that reduces exterior heat gain and heat island effects (tree planting, reflective paving materials, covered parking, cool roofs, etc.).	Consistent. The proposed Project is intended to serve as a central, open, passive recreational lawn area surrounded by a variety of natural play opportunities, picnic groves, equestrian facilities, and other supporting features. Additionally, the proposed landscaping would include trees that would provide shading for portions of the proposed surface areas. As such, the Project would incorporate design features that would reduce exterior heat gain and heat island effects. The Project is consistent with this policy.
Energy Policy 16.5. Require, to the extent feasible, building orientations and landscaping that use natural lighting to reduce energy demands.	Consistent. The proposed Project is intended to serve as a central, open, passive recreational lawn area surrounded by a variety of natural play opportunities, picnic groves, equestrian facilities, and other supporting features. The proposed Project would introduce a community hall that would offer multiuse space for private and public gatherings and would be built in accordance with Title 24 Standards to be energy efficient. The Project is consistent with this policy.

Table 3.6-2, continued

Policies and Measures	Project Consistency Analysis
Energy Policy 16.6. Evaluate and amend appropriate codes and ordinances in order to facilitate and encourage the installation of renewable energy systems and facilities (solar, wind, hydro-power, geothermal, and bio-mass), where appropriate, for all development.	Consistent. Currently, the City of Escondido does not require the installation of renewable energy production systems on public facilities. However, it is anticipated that the Project would include a solar-ready roof (community hall building) for future installation of such systems. The Project is consistent with this policy.

Source: City of Escondido, *General Plan*, 2012.

The Project would also comply with other measures listed in the CAP Consistency Review Checklist; refer to Section 3.8, *Greenhouse Gas Emissions*, and Appendix D. The CAP contains energy efficiency goals and policies that would help implement energy-efficient measures and subsequently reduce GHG emissions within the City. Therefore, the proposed Project would result in a less than significant impact associated with consistency with renewable energy or energy efficiency plans.

For the reasons above, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the projects, 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?	☐	☒	☐	☐

The following analysis is based upon available soils and geotechnical data from various sources, including databases, soils maps, and the City of Escondido General Plan EIR (City of Escondido 2012b). Relevant information was reviewed and incorporated herein where appropriate relative to the proposed Project.

DISCUSSION OF IMPACTS

- a) *Would the project 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? Refer to Division of Mines and Geology Special Publication 42? **Less than Significant Impact.***

Southern California, including the Project area, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a state-designated Alquist-Priolo Earthquake Fault Zone.

According to the General Plan EIR, the Project site is not located within any active fault zones nor an Alquist-Priolo Earthquake Fault Zone. There are no known faults traversing the site; potential faulting within the City boundaries is limited to a number of inferred fault traces in the southwestern portion of the City (City of Escondido 2012b). The Project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault (DOC n.d.).

The closest active faults include the Rose Canyon fault zone, approximately 15 miles southwest of the City; the Elsinore fault zone, approximately 20 miles northeast of the City; and the San Jacinto fault zone, approximately 40 miles northeast of the City. These faults have the greatest potential to result in seismic ground-shaking within the City (City of Escondido 2012b). The possibility of damage due to ground rupture is therefore considered low as no active faults are present in the Project vicinity and the site is not located within an Alquist-Priolo Earthquake Fault Zone.

However, like much of Southern California, the Project site is located in a seismically active area. The City requires proper development engineering and building construction of proposed development and enforces these requirements through the development and environmental review process. Additionally, the General Plan Community Protection Element identifies Soils and Seismicity Policies 7.1 through 7.4, which require adoption and enforcement of seismic and geologic safety standards; minimal public utility development in areas with geologic and seismic hazards; and preparation of a site-specific geotechnical analysis in areas with potential geologic and seismic hazards. Adherence to the California Building Code (CBC), as adopted in the City of Escondido Municipal Code, for any habitable structures (i.e., community hall building, caretaker's apartment) and compliance with the City's grading ordinance would further ensure that impacts relative to rupture of a known earthquake fault do not result with Project implementation. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

ii) *Strong seismic ground shaking? **Less than Significant Impact.***

Southern California has numerous active seismic faults subjecting residents to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for residents and structures, categorized either as primary or secondary hazards. Primary hazards include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Primary hazards can also induce secondary hazards such as ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

As stated in Response 3.7(a)(i), no faults (active, potentially active, or inactive) are known to exist in the immediate site vicinity. As the closest known active faults, the Rose Canyon Fault and the San Jacinto Fault would likely generate the most severe seismic ground shaking at the site with an anticipated maximum credible event of 7.0 and 7.2 magnitude, respectively (City of Escondido 2012b).⁶

As applicable, any new structures on-site (i.e., community hall building, caretaker's apartment) or other improvements would be constructed in accordance with the CBC in order to minimize risk of collapse during a seismic event. The CBC includes standards related to soils and foundations, structural design, building materials, and structural testing and inspections. Adherence to these building requirements, as well as conformance with seismic-related design requirements in the Municipal Code and General Plan, would reduce the potential for damage/major injury during a strong seismic ground shaking event. Therefore, the Project would not expose people or structures to potential adverse effects of strong seismic ground shaking. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

iii) *Seismic-related ground failure, including liquefaction? **Less than Significant Impact.***

Liquefaction is the phenomenon whereby soils lose shear strength and exhibit fluid-like flow behavior. Loose granular soils are most susceptible to these effects, with liquefaction generally restricted to saturated or near-saturated soils where the groundwater table is at depths of less than 50 feet below ground surface. Liquefaction normally occurs in soils such as sand in which the strength is purely friction; however, liquefaction has occurred in soils other than clean sand. Liquefaction occurs under vibratory conditions such as those induced by a seismic event.

According to the City of Escondido General Plan EIR, Figure 4.6-3, *Liquefaction Hazard Areas*, the Project site is partially located within a zone identified as a liquefaction hazard area. Liquefaction hazard areas primarily occur along natural waterways, including Escondido Creek (City of Escondido 2012b).

Future development of the site would be required to comply with all applicable General Plan policies and state and local building standards and regulations, including the CBC. Compliance with such policies and regulations would reduce direct impacts associated with liquefaction to a

⁶ The maximum credible event is the maximum earthquake that appears capable of occurring under the presently known tectonic framework.

less than significant level. As appropriate to the various improvements proposed with Project phasing, a comprehensive design-level geotechnical evaluation would be required prior to final design and construction. Such measures regulating construction would ensure that the Project would be designed to withstand potential seismic-related ground failure, including liquefaction. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

iv) Landslides? ***Less than Significant Impact.***

The topography of the Project site and surrounding vicinity is varied. On-site elevations generally range from approximately 600 to 650 feet above mean sea level (Michael Baker 2025b). Areas of steep slopes, with some areas exceeding slopes of 25 percent, are present in the western portion of the site.

According to the General Plan EIR, Figure 4.6-4, *Landslide Hazard Areas*, portions of the Project site are located in an area identified as being susceptible to landslides; however, such areas include the slopes in the western portion. The areas affected by the proposed improvements are generally flat and do not include substantial slopes or features that would increase the potential for landslide occurrence beyond existing conditions.

All future improvements implemented with the Master Plan would be subject to conformance with the CBC, Municipal Code, and General Plan requirements relative to standards for soils and foundations, structural design, building materials, and structural testing and inspections. With such adherence, impacts from exposure of people or structures to potential adverse effects from landslides would be less than significant.

Mitigation Measures: No mitigation is required.

b) *Would the project result in substantial soil erosion or the loss of topsoil?* ***Less than Significant Impact.***

Soil erosion is most prevalent in unconsolidated alluvium and surficial soils and in areas that have slopes. Erosive soils are generally found in areas of steep slope where runoff velocity is greater and vegetative cover is low. Geologically, El Caballo Park is predominantly underlain by granitic bedrock from the middle Cretaceous Woodson Mountain Granodiorite Formation. Soils in the park primarily consist of Visalia sandy loam with 0 to 2 percent slopes (64.9 percent) and Vista coarse sandy loam with 9 to 15 percent slopes (27.2 percent). Cienega-Fallbrook rocky, sandy loams with 30 to 65 percent slopes cover 5.3 percent of the Project area, and Friant rocky fine sandy loam with 30 to 70 percent slopes cover 2.6 percent of the Project area (Michael Baker 2025c).

Grading and trenching during Project construction would temporarily displace soils and temporarily increase the potential for such soils to be subject to wind and water erosion. In addition, the Project would increase impervious surface areas on-site, which would potentially contribute to increased stormwater runoff.

Pursuant to Municipal Code Section 22-26, *Reduction of Pollutants in Stormwater*, prior to any activities that may result in pollutants entering a Municipal Separate Storm Sewer System (MS4), the Project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for

approval by the City Engineer prior to construction. The SWPPP would identify BMPs to be implemented during construction in order to prevent erosion, minimize siltation impacts, and protect water quality. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. With implementation of the SWPPP and its associated BMPs, in combination with adherence to the CBC and local design regulations, as applicable, Project construction would result in a less than significant impact involving soil erosion and loss of topsoil.

Mitigation Measures: No mitigation is required.

- c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the projects, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? **Less than Significant Impact.***

On- or Off-site Landslide

Refer to Response 3.7(a)iv), above. The Project as designed would be required to comply with structural standards set forth by both the City and the state. Impacts in this regard would be less than significant.

Lateral Spreading

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope on a liquefied soil layer and is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along sloping ground.

The Project site is considered to have the potential for lateral spread to occur, based on its liquefaction potential; refer to Response 3.7(a)(iii) above. Compliance with the most recent CBC, as well as applicable local engineering design regulations, would ensure structural integrity during seismic events and prevent injury, loss of life, and substantial property damage. Potential impacts relative to lateral spreading would be less than significant in this regard.

Subsidence

According to the General Plan EIR, the underlying geologic formation in the entire County of San Diego, including the City, is mostly granite, which has a very low potential for soil shrinkage and subsidence (City of Escondido 2012b). Nonetheless, the Project would be required to demonstrate compliance with applicable CBC design requirements to reduce impacts related to unstable soil conditions, including any site-specific design recommendations. Pursuant to Municipal Code Chapter 6, Article 13, Section 6-371, issuance of a building permit may be subject to preparation of a soils investigation, with suggested recommendations from the soils report then incorporated into the Project design. Compliance with CBC design requirements and recommendations identified in the geotechnical analysis, as applicable, would reduce potential impacts to less than significant.

Liquefaction

Refer to Response 3.7(a)(iii), above. The risk of liquefaction can be reduced through appropriate land use planning, development engineering, and building construction practices. The Project

would comply with the most recent CBC as adopted by the City (as applicable to the improvements proposed), which identifies requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent other injury, loss of life, and substantial property damage. Conformance with such requirements would reduce potential impacts relative to liquefaction to less than significant.

Collapse

Neither natural nor man-made subsurface features that encourage collapse, including mines, aggregate extraction operations, or karst topography, are known to underlie or occur adjacent to the Project site. Therefore, mandatory compliance with applicable state and local design and engineering codes and regulations would ensure that impacts related to unstable or collapsible soils would be less than significant.

Mitigation Measures: No mitigation is required.

- d) *Would the project 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? **Less than Significant Impact.***

Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements.

According to the General Plan EIR, Figure 4.6-5, *Expansive Soils*, the Project site is not within an area designated with expansive soils (City of Escondido 2012b). Nonetheless, the Project would be subject to applicable CBC requirements, as well as site-specific design recommendations identified in a geotechnical analysis pursuant to Municipal Code Chapter 6, Article 13, Section 6-371, as applicable. Compliance with such requirements would further ensure that potential impacts remain less than significant.

The Project site has a low risk for expansive soils. Impacts pertaining to direct or indirect risks to life or property due to expansive soils would be less than significant.

Mitigation Measures: No mitigation is required.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? **No Impact.***

The Project would connect to the City's existing public sewer system. Septic tanks and alternative wastewater disposal systems would not be installed on the Project site. Project implementation would not result in impacts to soils associated with the use of such wastewater treatment systems. No impact would occur.

Mitigation Measures: No mitigation is required.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? **Less than Significant Impact with Mitigation Incorporated.***

The Project site currently supports the existing park facilities and therefore has been previously disturbed. Minor grading and excavation has occurred on-site (surface parking areas, equestrian facilities) during prior development. As proposed, additional ground disturbance would be required for installation of building foundations, ground surfacing for the equestrian and supporting recreational facilities, surface parking, extension of utilities, improvements to Escondido Creek channel, and/or other planned improvements as identified in the Master Plan.

Geologically, El Caballo Park is predominantly underlain by granitic bedrock from the middle Cretaceous Woodson Mountain Granodiorite Formation. Soils in the park primarily consist of Visalia sandy loam with 0 to 2 percent slopes (64.9 percent) and Vista coarse sandy loam with 9 to 15 percent slopes (27.2 percent). Cienega-Fallbrook rocky, sandy loams with 30 to 65 percent slopes cover approximately 5.3 percent of the Project area, and Friant rocky fine sandy loam with 30 to 70 percent slopes cover approximately 2.6 percent of the Project area (Michael Baker 2025c).

Figure 4.5-2, *Geological Formations*, of the General Plan EIR identifies the majority of the Project site as underlain by old alluvial valley deposits (Qoa; late to middle Pleistocene) having a moderate resource potential, and young alluvial valley deposits (Qya; Holocene and late Pleistocene), having a low resource potential (City of Escondido 2012b). The western third of the property (northwestern portion) is generally underlain by upper cretaceous rocks (MzU; Cretaceous).

The Qoa formation, which underlies the majority of the Project area, is old enough at all depths to produce fossils. The Qya formation is only found directly beneath or adjacent to Escondido Creek; however, as this formation has the potential to produce fossils and information as to the depth of this formation in the Project area is currently undetermined, it is assumed to have a moderate to high paleontological sensitivity (SVP 2010). Project excavation activities may therefore have the potential to encounter unknown buried paleontological resources within these formations and would require full-time monitoring during construction.

The MzU formation has no paleontology sensitivity, as it does not have the potential to preserve fossils. Project-related ground disturbance within this area would therefore not be anticipated to encounter sensitive paleontological resources.

As such, prior to the commencement of ground-disturbing activities, mitigation measure **GEO-1** would require retention of a qualified paleontologist to conduct full-time paleontological monitoring during all ground-disturbing activities in areas with the potential to support unknown buried paleontological resources (Qoa and Qya formations). Any ground disturbance outside of these formations would not require monitoring unless an unexpected find is made. In the event that paleontological resources are encountered during construction, mitigation measure **GEO-2** would require all Project construction activities to halt in the area until a qualified paleontologist evaluates the significance of the find and recommends a course of action. With implementation of mitigation measures **GEO-1** and **GEO-2**, impacts would be reduced to less than significant.

Mitigation Measures:

GEO-1 Paleontological Construction Monitoring. Prior to the commencement of grading or excavation activities occurring wholly or partially within moderate to high paleontological sensitivity zones (Qoa and Qya), the applicant shall retain a Society of Vertebrate Paleontology (SVP) qualified paleontologist to conduct full-time paleontological monitoring. Monitoring outside of these formations shall not be required unless an unexpected find is made. A qualified professional paleontologist is a professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research (i.e., the identification of fossil deposits, application of paleontological field and laboratory procedures and techniques, and curation of fossil specimens), and at least four months of supervised field and analytic experience in general North American paleontology as defined by the SVP.

The qualified paleontologist shall monitor earthwork affecting the aforementioned geological units or supervise the monitoring of these activities by a paleontological monitor. Monitoring logs shall be submitted to the City of Escondido Director of Development Services. If evidence of subsurface paleontological resources is discovered during excavation activities, mitigation measure **GEO-2** shall be implemented.

GEO-2 Resource Evaluation. If evidence of subsurface paleontological resources is found during construction activities, excavations within 50 feet of the find shall cease and the construction contractor shall contact the City of Escondido Director of Development Services. With direction from the Director of Development Services, the qualified paleontologist shall evaluate the find, prior to resuming construction activities in the immediate vicinity of the find. If the City of Escondido determines the resource is significant and cannot be immediately recovered, the qualified paleontologist shall prepare and execute a Paleontological Resources Mitigation Program for the salvage and curation of the identified resource(s). The Paleontological Resources Mitigation Program shall specify the fieldwork and laboratory methods to be undertaken, curation requirements, proposed staff qualifications, and whether the entire resource is to be collected or a specified statistically significant sample.

The qualified paleontologist shall determine when work within the immediate vicinity of the find may resume, or otherwise expand or reduce the construction exclusion buffer as warranted to ensure proper treatment of resources. The qualified paleontologist may reduce the frequency of monitoring, or cease monitoring altogether if observations of specific site conditions warrant.

Timing/Implementation: Prior to, during, and upon completion of Project construction

Enforcement/Monitoring: City of Escondido Development Services Department

Level of Significance after Mitigation: Less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The following discussion is based upon greenhouse gas (GHG) emissions and energy consumption data (2025a; see Appendix A) and the Climate Action Plan (CAP) Consistency Review Checklist (2025d; see Appendix D), both prepared by Michael Baker International.

The City of Escondido CAP was adopted in 2021. The CAP provides a roadmap for reducing GHG emissions through the implementation of various strategies, goals, actions, and supporting measures.

The following measures as identified in the City's CAP Consistency Review Checklist (CAP Consistency Checklist) are applicable to the Project:

Strategy 1: Increase the Use of Zero-Emission or Alternative Fuel Vehicles

Measure T-1.3 and T-1.4: Electric Vehicle Charging Stations

Install electric vehicle charging stations (EVCS) consistent with the following requirements:

- Comply with the most recently updated version of the California Building Energy Efficiency Standards (Title 24, Part 6).

Measure T-3.2: Pedestrian Infrastructure

If the following conditions are met, would the project pay its fair-share contribution or fully install pedestrian infrastructure improvements?

- The project frontage is located along a roadway for which pedestrian improvements are identified in the City's Street Design Manual, Pedestrian Master Plan, Trail Master Plan, or Safe Routes to School and Transit Plans;
- The proposed project would include site design amenities with pedestrian access points from the existing, identified roadway; and,
- The identified pedestrian improvements have not yet been installed. Or if they have been installed, the infrastructure is being redesigned, upgraded, and/or maintained to promote universal access.

Strategy 9: Carbon Sequestration and Land Conservation

Measure C-9-1: Enforce Landscape Tree Requirements at New Development

Adopt an updated landscape ordinance, effective in 2022, to increase the number of new trees planted at new developments by requiring:

- Non-residential developments to plant a minimum of one non-invasive and drought tolerant tree for every four parking spaces; and
- New single-family and multi-family residential developments to plant a minimum of one non-invasive and drought tolerant tree per unit, or pay an in-lieu fee so that the tree(s) can be planted elsewhere.

Thresholds of Significance

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 General Plan amendments and annexations that increase emissions beyond CAP projections, would require a project-level GHG analysis.

The City has developed its CAP Consistency Checklist, and Guidance for Demonstrating Consistency with the City of Escondido CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and that trigger environmental review pursuant to CEQA. The CAP establishes a GHG screening threshold of 500 metric tons of carbon dioxide equivalent (MTCO_{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. Projects that exceed the established CAP threshold of 500 MTCO_{2e} per year would need to showcase consistency with CAP measures.

In addition to determining consistency with the City's CAP Consistency Checklist, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This analysis also quantifies a project's potential GHG emissions.

DISCUSSION OF IMPACTS

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? **Less than Significant Impact.***
- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? **Less than Significant Impact.***

Project-Related Sources of Greenhouse Gases

As stated previously, for over half of a century, the land comprising the upper portion of El Caballo Park has been utilized by the Charros of Escondido to conduct charreadas and choreographed horse shows. The existing on-site arenas and corrals accommodate horses and cattle used in the charreada events. Practices are held throughout the week leading to the charreadas routinely held on Sundays, and the facilities are also currently used by other local groups for equestrian lessons and riding activities.

The proposed Project does not represent a new use on-site and would continue future equestrian use of the property. Although various Project components would support enhanced equestrian activities, such uses would not substantially increase GHG emissions from animal operations that would contribute to adverse climate change effects. As discussed below, Project-related GHG emissions from direct and indirect sources combined would be well below the CAP screening threshold of 500 MTCO₂e per year. The addition of any emissions generated by animal waste associated with the proposed improvements would not cause the Project to exceed this threshold or conflict with applicable CAP measures.

Project-related direct GHG emission sources would include emissions from construction activities, area sources, mobile sources, and refrigerants, while indirect sources would include emissions from energy consumption, water demand, and solid waste generation. The most recent version of the CalEEMod, version 2022.1 was used to calculate Project-related GHG emissions. According to the *El Caballo Park Master Plan Trip Generation Summary* (see Appendix G), the proposed Project would generate 60 average daily trips on weekdays and 272 average daily trips on weekends. As a conservative estimate, emissions from the existing uses on-site were not modeled or deducted from Project-generated emissions. Table 3.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated GHG emissions of the proposed Project. CalEEMod outputs are contained in Appendix A, *Air Quality/Energy/Greenhouse Gas Emissions Modeling Data*.

Table 3.8-1: Estimated Greenhouse Gas Emissions

Source	CO ₂ metric tons per year ¹	CH ₄ metric tons per year ¹	N ₂ O metric tons per year ¹	Refrigerants metric tons per year ¹	CO ₂ e metric tons per year ¹
Direct Emissions: Construction (631.0 MTCO ₂ e amortized over 30 years)	20.87	<0.01	<0.01	<0.01	21.03
Direct Emissions: Mobile Source	140.00	0.01	0.01	0.14	142.00
Direct Emissions: Area Source	0.02	<0.01	<0.01	0.00	0.02
Direct Emissions: Refrigerants	-	-	-	<0.01	<0.01
<i>Total Direct Emissions²</i>	<i>160.89</i>	<i>0.01</i>	<i>0.01</i>	<i>0.14</i>	<i>163.05</i>
Indirect Emissions: Energy	31.0	<0.01	<0.01	0.00	31.10
Indirect Emissions: Water	40.20	0.01	<0.01	0.00	40.40
Indirect Emissions: Solid Waste	0.96	0.10	0.00	0.00	3.37
<i>Total Indirect Emissions²</i>	<i>72.16</i>	<i>0.11</i>	<i><0.01</i>	<i>0.00</i>	<i>74.87</i>
Total Project-Related Emissions²	237.92 MTCO₂e per year				
City of Escondido CAP Screening Threshold	500 MTCO₂e per year				
Project Exceeds the Screening Threshold?	No				

Notes:

¹ Emissions calculated using California Emissions Estimator Model Version 2022.1 computer model.

² Totals may be slightly off due to rounding.

CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrogen dioxide; CO₂e = carbon dioxide equivalent; MTCO₂e = metric tons of carbon dioxide equivalent; CAP = Climate Action Plan

Source: Michael Baker 2025a; see Appendix A for detailed model input/output data.

Direct Project-Related Sources of Greenhouse Gases

- **Construction Emissions.** Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions. As shown in Table 3.8-1, the proposed Project would result in 21.03 MTCO₂e per year when amortized over 30 years (or a total of 631.00 MTCO₂e in 30 years). As discussed in Section 3.3, *Air Quality*, CalEEMod modeling assumes that the proposed Project would construct a new park, which presents a more conservative estimate on construction emissions, while in reality, the Project proposes improvements to the existing park use.
- **Mobile Source.** CalEEMod relies upon trip generation rates from the *El Caballo Park Master Plan Trip Generation Summary* and Project-specific land use data to calculate mobile source emissions. The Project would directly result in 142.00 MTCO₂e per year of mobile source-generated GHG emissions; refer to Table 3.8-1.
- **Area Source.** Area source emissions were calculated using CalEEMod and Project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. The Project would directly result in 0.02 MTCO₂e per year from area source emissions; refer to Table 3.8-1.

- Refrigerants. Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are hydrofluorocarbons (HFCs) or blends thereof, which can have high global warming potential (GWP) values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. The Project would emit less than 0.01 MTCO₂e per year from refrigerants; refer to Table 3.8-1.

Indirect Project-Related Sources of Greenhouse Gases

- Energy Consumption. Energy consumption emissions were calculated using CalEEMod and Project-specific land use data. San Diego Gas & Electric would provide electricity and natural gas to the Project site. The Project would indirectly result in 31.10 MTCO₂e per year due to energy consumption; refer to Table 3.8-1.
- Water Demand. Project operations would result in a demand of approximately 28 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 40.40 MTCO₂e per year; refer to Table 3.8-1.
- Solid Waste. Solid waste associated with operations of the proposed Project would result in 3.37 MTCO₂e per year; refer to Table 3.8-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table 3.8-1, the total amount of Project-related GHG emissions from direct and indirect sources combined would total 237.92 MTCO₂e per year, which would not exceed the CAP screening threshold of 500 MTCO₂e per year. Thus, the Project would not be required to show consistency with applicable CAP measures.

Consistency with Applicable GHG Plans, Policies, or Regulations

Consistency with the 2022 CARB Scoping Plan

The California Air Resources Board's (CARB) 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each Assembly Bill (AB) 32 inventory sector. Table 3.8-2, *Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors*, provides an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table 3.8-2: Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors

Emission Source Category	Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	Consistent. The proposed improvements would include various features that would reduce overall VMT. Specifically, the proposed Project would enhance the walkability of the site and promote alternative modes of transportation. Improvements include the addition of equestrian and pedestrian connections to existing trails, the construction of new bridges to allow bicycle and pedestrian access, installation of 30 bicycle racks, and new trail pathways. The proposed Project would also include facilities such as picnic tables, shade trees, and other recreational facilities that promote pedestrian walkability. Additionally, a bus stop serviced by the NCTD is located south of the Project site on East Valley Parkway. The Project would provide appropriate pedestrian connections on-site and would not impact the existing bus stop. As such, the Project would encourage alternative modes of transportation that would help reduce the Project's total VMT. The Project would be consistent with the action.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	Consistent. The Project is not considered a commercial or residential development; however, a caretaker's apartment is proposed as part of the community hall building. Nevertheless, the Project would be built in accordance with Title 24 requirements, which would reduce overall energy consumption. The Project would be consistent with this action.
Construction Equipment	Achieve 25% of energy demand electrified by 2030 and 75% electrified by 2045	Consistent. As technologies advance and new regulations are adopted, electrical construction equipment will be integrated in the fleet. The Project would use construction equipment that complies with the latest regulations. The Project would be consistent with this action.
Non-combustion Methane Emissions	Divert 75% of organic waste from landfills by 2025	Consistent. Senate Bill (SB) 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law establishes an additional target that not less than 20 percent of currently disposed edible food be recovered for human consumption by 2025. The Project would comply with local and regional regulations in place at the time when operational and would recycle or compost solid waste pursuant to SB 1383 requirements, as applicable. The Project would be consistent with this action.

Source: CARB, 2022 Scoping Plan, 2022.

Consistency with the San Diego Association of Governments (SANDAG) 2021 Regional Plan

Table 3.8-3, *2021 Regional Plan Consistency Analysis*, shows the Project's consistency with core strategies contained in the most recently adopted Regional Plan (2021).

Table 3.8-3: 2021 Regional Plan Consistency Analysis

Reduction Strategy	Project Consistency Analysis
Invest in a reimagined transportation system: Build a network and fund services that include multimodal roadways; an expanded network of fast, frequent, and low-cost transit; 21st-century technology that manages the entire transportation system and connects people to on-demand services; and zero-emission options for vehicles and micromobility.	Not Applicable. The Project is not a transit project. This strategy is not applicable to the Project.
Incentivize sustainable growth and development: Collaborate with local jurisdictions and fund programs that accelerate housing production while also addressing the intertwined issues of equity, climate resilience, and mobility.	Not Applicable. The proposed Project is not a residential project; however, a caretaker's unit would be provided as part of the proposed community hall. This strategy is not applicable to the Project.
Implement innovative demand and system management: Reduce solo driving and congestion through increased remote work, carsharing, vanpooling, pricing strategies, and parking-management programs that leverage partnerships and technology.	Consistent. The proposed Project is not a facility that supports remote work or parking management programs. Nevertheless, a bus stop operated by NCTD is located within 300 feet south of the Project site along East Valley Parkway and may serve visitors of El Caballo Park. Additionally, the VMT analysis prepared for the Project identifies an estimated 2.5 passengers per vehicle visiting the site (based on the land use), which would contribute to reduced vehicle trips (see Appendix G). The Project would be consistent with this strategy.

Source: SANDAG, 2021b. *San Diego Forward: The 2021 Regional Plan*.

Consistency with the City of Escondido Climate Action Plan Checklist

As previously discussed, new development projects that emit more than 500 MTCO₂e per year would be required to showcase consistency with applicable CAP measures. In addition, the Project must be consistent with the General Plan land use designation. As discussed in Section 2.0, *Project Description*, the Project site is designated as SPA 5 (Northeast Gateway SPA #5). As discussed in Section 3.11, *Land Use and Planning*, the Project site currently supports the existing park use and the proposed Project would be consistent with the General Plan land use designation. No changes to the existing General Plan land use designation would be required or proposed to allow for Project implementation.

According to the CAP Consistency Checklist, the proposed Project would fall under the "Other" land use category; refer to Appendix D. Specifically, the CAP Consistency Checklist states that any project that falls under the "Other" land use category requires the need for GHG analysis and corresponding mitigation measures if a project exceeds the 500 MTCO₂e per year screening threshold. As shown in Table 3.8-1, the proposed Project would be below this 500 MTCO₂e threshold. Additionally, it should be noted that the GHG emissions shown in Table 3.8-1 present a more conservative analysis since they account for the construction and operation of a new park, while the proposed Project would implement improvements to existing facilities and park areas. Since the proposed Project does not exceed the CAP Consistency Checklist screening threshold

of 500 MTCO₂e per year, the Project's GHG impacts would be less than significant and would not be required to show consistency with the CAP measures.

In summary, the Project's characteristics render it consistent with statewide, regional, and local climate change mandates, plans, policies, and recommendations. More specifically, the GHG plan consistency analysis provided above demonstrates that the Project complies with the GHG reduction goals, policies, actions, and strategies outlined in the 2022 Scoping Plan and the 2021 Regional Plan. Additionally, Project emissions would not exceed the CAP's screening threshold of 500 MTCO₂e per year, as shown in Table 3.8-1. Since the proposed Project would not exceed the applicable threshold, the CAP determined that the Project's GHG impact would be less than significant. Consistency with these plans helps to further reduce the impact of the Project's incremental contribution of GHG emissions.

The Project would not conflict with any applicable plan, policy, regulation, or recommendation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, 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?	☐	☐	☒	☐

DISCUSSION OF IMPACTS

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

The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities. None of these uses are proposed by the Project; rather, the Project would consist of a recreational use including equestrian facilities and associated seating, public gathering and picnicking areas, shade structures, restrooms, maintenance facilities, a community hall, landscape enhancements, and supporting surface parking, among other elements.

Reflective of current park operations, equestrian uses on-site with Project implementation would not generate substantial amounts of animal waste. All arenas, corrals, round pens, and other equestrian facilities would be maintained and cleaned on a daily basis to ensure proper management and removal of animal waste. As noted, a muck storage area (covered) is proposed in the northeastern portion of the site to temporarily accommodate and maintain animal waste on-site. All animal waste would be properly handled and disposed of in accordance with standard procedures and applicable public health and safety regulations, similar to that which presently occurs.

In California, routine animal waste is considered a non-hazardous, non-toxic solid waste, rather than a hazardous waste. Additionally, the City of Escondido Police Department, Animal Services Division, handles animal control, nuisance complaints, waste/sanitation issues related to animals, and enforcement of local and state animal regulations. Such oversight would further ensure that on-site operations do not result in potential adverse effects on surrounding uses. Refer also to Section 3.3, *Air Quality*.

Project construction could expose construction workers and the public to temporary hazards related to the routine transport, use, and maintenance of standard construction materials (i.e., paints and solvents, oil, diesel fuel, and transmission fluid, and other hazardous materials), which could be hazardous. These activities would be short-term in nature and the materials would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All Project construction activities would be required to comply with the applicable federal, state, and/or local laws and regulations governing the use, storage, transport, and disposal of hazardous materials, ensuring that potentially hazardous materials are used and handled in an appropriate manner. As such, the Project would not create a hazard to the public or to the environment. Impacts would be less than significant.

Similarly, the use of limited amounts of hazardous materials is anticipated during Project operation. Occasional use of pesticides and herbicides for landscape maintenance would generally represent the extent of hazardous materials routinely utilized on-site. If on-site storage does occur, it would not be in substantial quantities (quantities are required to be reported to a regulatory agency) and would not pose a risk to public health or safety.

Any use of hazardous materials would occur in compliance with applicable federal, state, and local standards associated with the use, handling, and/or disposal of hazardous materials. The Project would not create a hazard to the public or to the environment. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? **Less than Significant Impact.***

Refer to Response 3.9(a), above. Project construction activities could result in the transport, use, and disposal of hazardous materials such as gasoline fuels, asphalt, lubricants, paint, and solvents. Although care would be taken to transport, use, and dispose of small quantities of these materials by licensed professionals, there is a possibility that upset or accidental conditions may arise which could release hazardous materials into the environment. Accidental releases of

hazardous materials are those releases that are unforeseen or that result from unforeseen circumstances, while reasonably foreseeable upset conditions are those release or exposure events that can be anticipated and planned for.

Project construction activities would occur in accordance with all applicable local standards adopted by the City of Escondido, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as requirements of the California Occupational Safety Hazard Act, Hazardous Waste Control Act, California Accidental Release Protection Program, and California Health and Safety Code.

Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with National Pollution Discharge Elimination System (NPDES) Permit regulations administered by the San Diego RWQCB. Construction of the improvements identified in the Master Plan would require implementation of a stormwater pollution prevention plan (SWPPP) and compliance with Construction General Storm Water Permit requirements to ensure that stormwater quality is maintained and free from hazardous contaminants (refer to Section 3.10, *Hydrology and Water Quality*). The contractor would be required to implement such regulations relative to the transport, handling, and disposal of any hazardous materials, including the use of standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local and state laws.

Project implementation would result in new and/or enhanced recreational park and equestrian-related uses on the site, consistent with the land uses currently occupying the site. Due to their nature, the intended uses are not generally expected to involve the routine transport, use, or disposal of hazardous substances or materials in substantial quantities; however, such activities may be associated with daily operations, depending on the specific use or activity. Once the Project is operational, hazardous material use associated with landscaping and maintenance activities would generally be limited to use of commercially available cleaning products, landscaping pesticides and fertilizers, and/or use of various other commercially available substances. Development of the site is therefore anticipated to result in limited use of commercially available, potentially hazardous materials or chemicals. The use of these substances is expected to occur in relatively small quantities and to be typical of that for recreational park use and associated landscape maintenance. All such use would be subject to applicable federal, state, and local health and safety laws and regulations intended to minimize health risk to the public.

For the reasons above, the Project is not anticipated to 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. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? **No Impact.***

See Responses 3.9(a) and 3.9(b) above. The nearest school is Valley High School, located approximately 0.4 miles to the southeast of the site. No schools are located within one-quarter mile of the Project site. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? **No Impact.***

Government Code Section 65962.5 requires the California Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) to compile and update regulatory sites listings (per the criteria of the Section). The California Department of Public Health is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code. Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the CCR, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

Research of the California DTSC Cortese List Data Resources revealed that the Project site is not listed as a hazardous materials site. The Cortese List indicates that no above- or belowground storage tanks, soil stains, or other potential hazards to the public are located on-site (DTSC 2025; SWRCB 2025). The Project would not create a significant hazard to the public or the environment. No impact would result.

Mitigation Measures: No mitigation is required.

- e) *For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area? **No Impact.***

The nearest airport to the Project site is the Ramona Airport, approximately 10.5 miles to the southeast. Based on the *Airport Land Use Compatibility Plan for Ramona Airport*, adopted April 2022, the Project site is not located within a safety zone or noise exposure zone (San Diego County Airport Land Use Commission 2022). The Project site is not located within the vicinity of a private airstrip or related facilities. Project implementation would not expose people residing or working in the Project area to excessive noise levels or safety hazards associated with aircraft. No impact would occur.

Mitigation Measures: No mitigation is required.

- f) *Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? **Less than Significant Impact.***

Pursuant to Municipal Code 7-8, *Emergency Operations Plan*, the City is responsible for the development of the City's emergency operation plan, which provides an outline for effective mobilization of all resources (e.g., fire protection services, police services) during a local emergency, state of emergency, or state of war. As of August 2025, the City has yet to adopt an emergency operation plan.

The County of San Diego (County) has adopted an emergency operations plan which provides insight on the mobilization of public and private resources on a county level during a state of emergency. According to the San Diego County's *Emergency Operations Plan, Annex Q – Evacuation*, the closest major evacuation route to the Project site is I-15, located approximately 4.1 miles to the southwest (San Diego County 2022). Locally, the Escondido General Plan Community Protection Element identifies Bear Valley Parkway/East Valley Parkway/Valley Center Road as designated evacuation routes (Figure VI-1, *Emergency Evacuation Routes*; City of Escondido 2012a).

The City of Escondido also participates in implementing the San Diego County *Multi-Jurisdictional Hazard Mitigation Plan*, which is intended to provide guidance for responding to emergency situations through a coordinated system of emergency service providers and facilities. The plan addresses planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The plan focuses on potential large-scale disasters that represent unique situations requiring unusual emergency responses. Such threats addressed by the plan include wildfire, structure fire, flood, coastal storms, erosion, tsunami, earthquakes, liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism (City of Escondido 2012b).

During construction, materials would be placed within the Project boundaries adjacent to the current phase of construction to avoid any access conflicts in case of emergency evacuations. As under existing conditions, access to the site would continue to be from Beven Drive to Save A Life Way or from Beven Drive to Wohlford Drive. As appropriate, final improvement plans would be subject to review by City emergency personnel for the potential to interfere with emergency evacuation routes to ensure that access and circulation are maintained during Project construction and operation.

Access and circulation improvements would include expanded vehicular access, as well as emergency access and circulation. The Project proposes an emergency drive-through and turn-around loop off of Save A Life Way and an emergency vehicular hammerhead in the vicinity of the existing arena; refer to Figure 2-5, *Proposed Master Plan*. Such improvements would enhance public safety on-site as compared to existing conditions.

The Project does not propose any components that would obstruct or conflict with emergency response or evacuation during Project operations. No off-site roadway improvements are proposed that would alter existing vehicular circulation patterns. The provision of emergency services to the site and surrounding properties would not be impacted as primary access to all major roads would be maintained with Project implementation.

Mitigation Measures: No mitigation is required.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? **Less than Significant Impact.***

Refer also to Section 3.20, *Wildfire*. The Project site currently supports similar equestrian- and recreational-related facilities, as well as hosting public and private equestrian-related activities and other group events, similar to that which would occur with Project implementation. No change in existing land uses surrounding the site would occur with the Project.

State Responsibility Areas (SRAs) are areas where the California Department of Forestry and Fire Protection (CalFire) is responsible for wildfire protection; Local Responsibility Areas (LRAs) are areas where local fire protection agencies, such as the Escondido Fire Department, are responsible for wildfire protection. According to CalFire's Hazard Severity Zone Map, the Project site and all adjacent lands are located within a Very High Fire Danger/Hazard Severity in a LRA, indicating an increased risk for potential wildfire occurrence (CalFire 2025).

Under existing conditions, the Project site is served by the City of Escondido Fire Department. Fire protection services would be provided from Fire Station 2, located at 421 N. Midway Drive in Escondido, approximately 1.7 miles to the southwest of the site.

The Project includes a proposed emergency drive-through and turn-around loop from the northern end of Save A Life Way and adjacent to Escondido Creek and the proposed equestrian trailer parking area; refer to Figure 2-5, *Proposed Master Plan*. An emergency vehicular hammerhead is also proposed in the northwestern portion of the site between the therapeutic riding arena and the improved existing arena, to allow for additional emergency vehicle access.

Although the proposed improvements would allow for increased attendance at certain regularly held events, or for additional privately or publicly-held events to occur on-site intermittently (see also Table 2-2, *Existing and Anticipated Park Operations*), it is not anticipated that such attendance would substantially increase the potential risk of exposure of occupants of the site to adverse effects related to wildfire. As the Project would not substantially alter or expand the on-site land uses, it is anticipated that existing fire protection services available at the time specific Project improvements are implemented would remain adequate over time to serve the Project as proposed; the need for new fire protection facilities or personnel is not anticipated as the direct result of Project implementation. However, as the Project would be phased, the City would evaluate existing conditions as improvements are to be implemented to determine the adequacy of fire protection services for the Project site.

The City implements the Escondido Fire Code, found in the Escondido Municipal Code, Chapter 11, Article 2, Division 1 (Ordinance 2022-04: adopted December 7, 2022), which adopts the 2022 California Fire Code, California Code of Regulations, Title 24, Part 9. The City Fire Code applies to LRAs and provides minimum fire safety requirements for new and existing buildings, facilities, storage, and processes; and addresses fire prevention, fire protection, life safety, and the safe storage and use of hazardous materials in new and existing buildings, facilities, and processes. The City Fire Code provides measures for controlling fire hazards in all buildings and sites, regardless of the hazard being indoors or outdoors. As applicable, final design of the proposed Project would be subject to conformance with appropriate measures given in the Fire Code to ensure that potential fire risk is minimized and public safety is maintained during all phases.

With Project adherence to applicable local building and design regulations aimed at fire protection and reduced wildfire risk, it is not anticipated that the Project would expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on-or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or,	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following discussion is based on the *El Caballo Park Stormwater Technical Memorandum* prepared by Michael Baker International (2024; see Appendix E).

DISCUSSION OF IMPACTS

- a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? **Less than Significant Impact.***

Stormwater runoff generally discharges into storm drains and/or flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational

water, and wildlife. Stormwater characteristics depend on site conditions, e.g., land use, impervious cover, pollution prevention, types and amounts of BMPs, rain events (duration, amount of rainfall, intensity, time between events), soil type and particle sizes, multiple chemical conditions, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria.

The majority of stormwater discharges are considered nonpoint sources and are regulated by an NPDES Municipal General Permit or Construction General Permit. The San Diego RWQCB administers the NPDES stormwater permitting program for construction activities for the Project area. Construction activities disturbing one acre or more of land are subject to the permitting requirements of the NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity. The City, as the lead agency, is required to submit a Notice of Intent to the RWQCB that covers the Construction General Permit prior to the beginning of construction. The Project would comply with the requirements of the NPDES General Permit for the City (State Water Resources Control Board Order WQ 2022-0057-DWQ NPDES No. CA000002).

On-site improvements and El Caballo Park are classified as a Priority Development Project based on exceeding 2,500 square feet of new and/or replaced impervious area. The 2,500 square-foot threshold is due to Escondido Creek being classified as an Environmentally Sensitive Area (ESA) per Section 1.4.1(d) of the City of Escondido Stormwater Design Manual (BMP Manual), dated October 2022. The Project would include post-construction site design, source control, and treatment control BMPs consistent with all local, state, and federal requirements for Priority Development Projects as defined in the City's BMP Manual.

The Construction General Permit requires preparation and implementation of a water quality management plan and a SWPPP, both of which must be prepared before construction of any Project components could begin. The water quality management plan would outline the Project site design, source control, and treatment control of BMPs utilized throughout the life of the Project. In accordance with Municipal Code Section 22-26, *Reduction of Pollutants in Stormwater*, prior to any construction activities that may result in pollutants entering a Municipal Separate Storm Sewer System (MS4), a SWPPP would be prepared for approval by the City Engineer. The SWPPP would be required to identify all activities to prevent stormwater contamination, control sedimentation and erosion, and comply with CWA requirements during construction. Based on final engineering design (when undertaken), the SWPPP would include site-specific construction BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project area. Potential construction BMPs may include the following:

- Minimization of disturbed areas to the portion of the Project site necessary for construction
- Stabilization of exposed or stockpiled soils and cleared or graded slopes
- Establishment of permanent landscaping as early as feasible
- Removal of sediment from surface runoff before it leaves the Project site by silt fences or other similar devices around the site perimeter
- Protection of all storm drain inlets on-site or downstream of the Project site to eliminate entry of sediment

- Prevention of tracking of soil through use of a gravel strip or wash facilities at exits from the Project area
- Proper storage, use, and disposal of construction materials
- Continual inspection and maintenance of all specified BMPs through the duration of construction

Conformance to such measures and required adherence to state and local regulations would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. No mitigation measures are required and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

Water service for the Project would be supplied from the City's public water supply system rather than from groundwater, which would not result in a net deficit of aquifer volume or lowering of the groundwater table. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- c)i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on-or off-site? **Less than Significant Impact.***

The main off-site stormwater flow entering the Project site is in the form of an existing natural channel that concentrates runoff from the adjacent hillsides and the overflow of Lake Dixon. The channel conveys off-site run-on through El Caballo Park towards Escondido Creek. The Dixon Reservoir emergency spillway is located west and upstream of the on-site channel.

The redevelopment of El Caballo Park is considered a Priority Development Project and would require treatment control BMPs for new and/or replaced impervious area. Peak flow increase during the 100-year storm event is anticipated based on new impervious area added and would require mitigation back to pre-development conditions.

The proposed park improvements would not change or alter the existing on-site channel conveying flow easterly towards Escondido Creek. The existing on-site channel is partially vegetated, partially concrete-lined, and partially rock-lined. Flow velocity and runoff within the channel would not be impacted by the proposed improvements; the channel is intended to remain close to its original condition to pass the off-site drainage through the site and accept treated drainage from several Project areas. A new on-site culvert crossing is proposed for vehicular

access and would include upstream and downstream riprap; this culvert would be designed to convey 100-year flows without overtopping. A second pedestrian crossing is proposed on-site, upstream from the vehicular crossing and is anticipated as a clear-span walkway deck that would not impact flow within the channel.

The Master Plan also contemplates future conversion of a portion of Escondido Creek (concrete) within the Project boundaries to a vegetative-lined channel. As a vegetative-lined channel would result in reduced flow capacity within the channel due to an increased roughness coefficient, the anticipated improvements include expanding the cross-sectional area of the creek to create additional flow capacity. Channel maintenance within Escondido Creek would be critical to ensure 100-year flow capacity is maintained. The overgrowth of vegetation would have the potential to result in reduced capacities and loss of flow containment, thereby resulting in off-site flooding. Under proposed conditions, flow velocities within the creek would be erosive during smaller, less intense storms. As such, installation of a soft bottom is therefore not recommended; rather, use of rock, concrete, or modular cells is recommended to protect against erosion where vegetation may not establish within the Escondido Creek channel (Michael Baker 2024). Refer to Appendix E for a more detailed discussion and modeling results.

As the Project has been envisioned at a Master Plan level, site-specific engineering design would be required as the various components are implemented. However, the Master Plan identifies the following on-site drainage improvements as potentially occurring with Project implementation which would be confirmed during final engineering design.

The northwest quadrant (Drainage Area A) of the Project site receives runoff from the hillsides of Daley Ranch. This runoff currently flows into the natural channel on-site. With exception of any non-native plant removals, the northwest quadrant of the site would remain in a natural state and runoff would continue to flow to the natural channel as it has historically. The southerly Project boundary accepts runoff from the hillsides located to the south of the property. The Master Plan envisions that these flows would be collected in a proposed brow ditch on-site, channeled away from the proposed development area, and discharged to points at the western and the eastern ends of the natural channel.

In general, the equestrian areas (Drainage Areas B, C, and F) would be of a natural ground surface or engineered equestrian soil mix that would provide a high moisture-holding capacity. Any surface runoff from these areas would be minimal and treated either via natural processes (i.e., infiltration) and/or treated in the proposed on-site infiltration/bio-retention areas or before being released to the flow-through channel. Surrounding areas would similarly remain of natural ground surface and are therefore also anticipated to have a high infiltration rate.

It is anticipated that the proposed common gathering and picnic area (Drainage Area D) would be surfaced with turf (grass) and surrounded by decomposed granite sidewalks. The area is expected to be graded to drain to the lawn area where it would be treated via natural processes. Any excess runoff would be piped to the flow-through channel.

Per the Master Plan, the proposed trailer parking area (Drainage Area E) would be surfaced with decomposed granite and would provide for subsurface storage and stormwater infiltration. Runoff from the relatively small impervious area of the maintenance building and muck storage planned for this area would be treated via natural processes during its flow across the decomposed granite

parking area. Any runoff reaching the southern end of the trailer parking area would be treated via a proposed on-site infiltration/bio-retention area.

On the east side of Escondido Creek, the existing dirt lot that would be converted to an overflow decomposed granite parking lot (Drainage Area G), currently drains westerly via sheet flow and shallow concentrated flow towards a curb inlet that discharges into Escondido Creek. No substantial hydrologic or hydraulic changes are proposed for this area with implementation of the Master Plan. The lot would be surfaced with decomposed granite, allowing for subsurface storage and infiltration of stormwater. Any precipitation that becomes stormwater runoff would be collected in a proposed infiltration/bio-retention area at the southerly end of the parking area where it would be treated via infiltration or otherwise treated and released. It is anticipated that new storm drains and area drains would be installed within the decomposed granite parking lot to facilitate drainage during intense storms and reduce future maintenance. Although future development of the subject property would result in the addition of impervious surfaces on-site, the Project would not substantially change existing drainage patterns, nor increase the rate or volume of stormwater runoff from the subject property. Additionally, the Project would implement BMPs in conformance with the City's Stormwater Design Manual and Municipal Code Chapter 22-26 requirements to reduce long-term water quality impacts to less than significant levels. All proposed stormwater infrastructure improvements and site grading would be subject to City discretionary review and approval of a grading permit. With conformance to such requirements, it is not anticipated that the Project would result in substantial erosion or siltation on- or off-site. Project impacts would be less than significant.

Mitigation Measures: No mitigation is required.

c)ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? **Less than Significant Impact.***

See Response 3.10(c)i., above for Project-specific discussion. The majority of the Project site is located in Zone X (Other Areas), as illustrated on FEMA Map Panel 0073C0820G, which is outside of a FEMA-mapped 100-year floodplain. However, the on-site channel conveying drainage southerly through the park towards Escondido Creek is mapped as Zone A and is associated with the Dixon Reservoir spillway. Zone A represents a high-risk flood area, specifically a Special Flood Hazard Area (SFHA), where there is a 1 percent annual chance of flooding (100-year flood). The Zone A mapping would require further analysis during final engineering for the Project, including the potential for a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR). Escondido Creek is not mapped as an SFHA within the Project boundaries (Michael Baker 2024).

No structures or unanchored impediments are proposed within a 100-year floodplain or other SFHA. The Project would include post-construction BMPs that would be designed, in part, to mitigate 100-year peak flow back to existing conditions. Proposed improvements to the Escondido Creek channel to convert a portion of the channel from concrete-lined to vegetated can be accommodated while still maintaining 100-year flow capacity. Final grading design would direct runoff away from all proposed structures.

Development of the site would not substantially change existing drainage patterns on-site or off-site, and no increase in the rate or amount of surface runoff would occur. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

c)iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would 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? **Less than Significant Impact.***

See Responses 3.10(a) and 3.10(c)i., above. Implementation of the proposed Master Plan improvements over time would have the potential to increase stormwater runoff with development of the site, as impervious surface area would increase compared to the current undeveloped condition. As noted, the Project would include post-construction BMPs that would be designed, in part, to mitigate 100-year peak flows back to existing conditions and to provide post-development treatment in accordance with Priority Development Projects. No downstream drainage systems would be impacted by post-construction runoff from the El Caballo Park. All runoff from new and/or replaced impervious surfaces would undergo on-site treatment prior to discharge to Escondido Creek.

The Project would be required to implement a SWPPP and BMPs to ensure that stormwater quality is properly managed during the construction and operational phases. Project conformance with relevant state and local regulations would prevent substantial stormwater pollutant discharge from entering the City's existing storm drain system.

The Project would not 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. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

c)iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would impede or redirect flood flows? **Less than Significant Impact.***

Refer to Responses 3.10(c)i and 3.10(c)ii, above. The Project would not alter existing drainage patterns nor divert flow, as compared to existing conditions. Further, the Project would not impede or redirect flood flows such that any off-site properties would be adversely affected by stormwater runoff from the site. The proposed on-site improvements within El Caballo Park would not impact the existing channel. Improvements within the Escondido Creek channel to convert a portion of the creek from concrete to vegetated can be achieved without substantially impeding flows. The introduction of vegetation within Escondido Creek would cause a minor impediment as compared to existing conditions (concrete); however, the creek would have capacity for 100-year conveyance when such vegetation is introduced and maintained (Michael Baker 2024).

With compliance with applicable state and local drainage regulations and standards, the Project would not substantially alter the existing drainage pattern of the Project site or substantially increase the rate or amount of surface runoff in a manner that would impede or redirect flood flows. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? **Less than Significant Impact.***

Refer to Response 3.10(c)ii., above. The Project as proposed is not anticipated to result in flooding that may in turn result in the release of pollutants due to inundation.

Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor. Tsunamis interact with the shallow sea floor topography upon approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The site is located approximately 17 miles east of the Pacific Ocean. Therefore, the site is not located in a tsunami inundation area; inundation due to tsunami would not occur.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water.

According to the General Plan EIR, seiches are possible at Lake Wohlford and Lake Dixon; however, the potential for loss of life from this hazard is low. The nearest body of water, Lake Dixon, is approximately 0.3 miles west of the Project boundary at its closest point. Although the lake lies within close proximity to El Caballo Park, the General Plan EIR indicates that lands surrounding Lake Dixon are designated as public land/open space so as not to allow land uses that would expose people or structures to impacts associated with a seiche (City of Escondido 2012b). Further, El Caballo Park is an existing public use, and no change in land use is proposed with the Project. The Project is not anticipated to increase the risk of release of pollutants due to Project inundation from a seiche event as compared to current conditions.

As the potential for Project inundation relative to flood hazard, tsunami, or seiche zones is low, it is not anticipated that the Project would risk release of pollutants as the result of such events. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

Refer to Responses 3.10(a), 3.10(c)i, and 3.10(c)iii, above. As described, the Project would require preparation and implementation of a site-specific SWPPP to manage stormwater runoff during construction activities as the Project components are built out. The SWPPP would include site design and source control BMPs to ensure stormwater runoff and impervious areas are minimized. Project implementation would occur in compliance with all relevant state and local

water quality management requirements (i.e., City BMP Manual) to ensure proper treatment and management of stormwater runoff generated on the Project site.

On-site soils have a moderate infiltration rate when thoroughly wetted; chiefly soils that are moderately deep to deep, moderately well drained to well drained, and moderately coarse textured. Rate of water transmission is moderate. This soil type is expected to be very effective with respect to its ability to infiltrate storm water. Infiltration would be maintained through Project design, and the Project would implement appropriate management practices, control techniques, system design and engineering methods, and other measures as applicable. The Project would not decrease the quality or increase the quantity or rate of runoff discharging from the site compared to existing conditions.

Water for the Project would be supplied by the City's public water system. It is anticipated that the Project would connect to existing water lines currently traversing the site; refer to Figure 2-6, *Existing Utilities*. The use of groundwater wells is not proposed. Therefore, it is not anticipated that the Project would conflict with or obstruct implementation of a groundwater management program.

With compliance with local, state, and/or federal water quality and groundwater requirements, as applicable, the Project would not conflict with a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an existing 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?	☐	☐	☒	☐

DISCUSSION OF IMPACTS

- a) *Would the project physically divide an existing community? **Less than Significant Impact.***

El Caballo Park is bounded to the north by Daley Ranch, an approximately 3,000-acre public open space preserve and recreational area. Northeast of the park is the San Diego Humane Society, which requires access via Save A Life Way through the park. To the east is Mayflower Dog Park and to the southeast is the Hidden Valley Obedience Club. An approximately 2.5-acre vacant dirt lot (included in the El Caballo Park Master Plan boundary) is located between the Hidden Valley Obedience Club and Beven Drive to the south. The Eureka Springs 340-unit residential development lies south of the park, to the east and west of East Valley Parkway. To the west of the park is the City of Escondido Water Treatment Plant, adjacent to Dixon Lake.

The proposed Master Plan improvements would be consistent with existing on-site uses and would not result in a land use that would conflict with or disrupt surrounding land uses or established development patterns. The anticipated equestrian and recreational facilities would generally be similar in character to those that presently operate on the site.

The Project does not propose any off-site roadway improvements, nor the construction of new off-site roads within the surrounding area that would have the potential to create a barrier between surrounding neighborhoods. Utility lines (i.e., sewer) would be extended into the site from existing lines currently serving adjacent properties, thereby avoiding substantial disruption along local roadways during the construction phase. All utility lines serving the site would be undergrounded and would therefore not create a barrier or obstruction on-site or in the surrounding area.

The Master Plan proposes improvements to connect Mayflower Dog Park with El Caballo Park to enhance the sense of community and use of the park by local residents and visitors to the area. Under current conditions, the concrete channel of Escondido Creek physically divides the two park spaces, making it difficult to move from one facility to the other. The Master Plan proposes construction of a rustic pedestrian bridge across the creek to link the two uses, with an entry point strategically located at the southwest end of Mayflower Dog Park with a direct view and path to El Caballo Park. Several smaller pedestrian and/or equestrian bridges (over the existing tributary

creek and at the southern end of Escondido Creek) within the park are also proposed to enhance connections between the elements and to better facilitate on-site circulation; refer to Figure 2-5, *Proposed Master Plan*.

The Project would not physically divide an established community as it would not introduce any physical divisions or barriers between the site and the surrounding area. No impact would occur.

Mitigation Measures: No mitigation is required.

- b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? **Less than Significant Impact.***

The Project site has a General Plan land use designation of SPA 5 (Northeast Gateway SPA #5) and is governed by the Northeast Gateway Specific Plan Area (SPA), with a zoning designation of S-P (Specific Plan Area). The site currently supports the existing park use; the proposed improvements and continued use of the park would not conflict with the existing zoning or land use designations. No changes to the existing zoning or General Plan land use are required or proposed to allow for Project implementation. The Project would not conflict with a land use plan, policy, or regulation applicable to the Project site relative to land use and zoning.

The El Caballo Park Master Plan has been developed with consideration for the Northeast Gateway Specific Plan, as appropriate, to ensure compatibility with development measures identified relative to minimizing potential environmental effects. Measures are provided in the Specific Plan to address grading, landscaping, and architectural design. As specific improvements identified in the Master Plan are implemented and Project design details (e.g., grading design, nighttime lighting) are available, conformance with the Specific Plan would be considered to ensure Project compatibility and to avoid potential conflicts with surrounding land uses.

Project construction and operation would be subject to other City regulations given in the Municipal Code aimed at reducing potential environmental effects. Relevant regulations include, but may not be limited to, Chapter 17, Article 12, *Noise Abatement and Control*; Chapter 33, Article 35, *Outdoor Lighting*; Sections 33-1068.C and 33-1069 for impacts to mature and protected trees; Section 33-1061, *Drainage*, for drainage and erosion control; and, Section 33-1066, *Design Criteria*, pertaining to grading requirements. City approval of a conditional use or special event permit may be required to ensure that on-site operations during special events remain in compliance with applicable use restrictions (i.e., noise controls, on-site food truck or concessions beyond that which would occur with operation of the proposed permanent concession stand, etc). The Project would be required to demonstrate compliance with such regulations; no conflict is anticipated. The Project site lies within the San Diego County MHCP and the City of Escondido draft MHCP Subarea Plan used for implementing the MHCP conservation goals. The western portion of El Caballo Park occurs within the hardline FPA of the MHCP; refer to Appendix A of Appendix B. The draft Subarea Plan requires mitigation for impacts to sensitive biological resources, including potential impacts on Diegan coastal sage scrub (2.64 acres), southern mixed chaparral (0.09 acres), and riparian scrub (0.42 acre), which are within the Project site (Michael Baker 2025b). If sensitive habitats in the FPA cannot be avoided or on-site conservation established, impacts to sensitive vegetation communities within the FPA would require off-site mitigation into lands inside an FPA or a conservation bank (i.e., Daley Ranch). Impacts to these

communities outside of the FPA would also require mitigation, but at a lower ratio. As the Subarea Plan has not yet been approved by CDFW and USFWS, consultation with the wildlife agencies would occur to ensure the Project is consistent with the MHCP and, as appropriate, an incidental take permit specifying compensatory mitigation requirements may be obtained. Project impacts would therefore be mitigated in compliance with MHCP requirements; no conflict with this plan would occur. Refer also to Section 3.4, *Biological Resources*.

The nearest airport to the Project site is the Ramona Airport, approximately 10.5 miles to the southeast. Based on the *Airport Land Use Compatibility Plan for Ramona Airport*, adopted April 2022, the Project site is not located within a safety zone or noise exposure zone (San Diego County Airport Land Use Commission 2022). Project implementation would not expose people in the area to potential hazards or excessive noise levels associated with aircraft operations. No conflict with the airport land use compatibility plan would occur.

Based on the above conditions, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

3.12 Mineral Resources

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

DISCUSSION OF IMPACTS

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?* **No Impact.**

The California Department of Conservation's Surface Mining and Reclamation Act of 1975 (SMARA) identifies a range of Mineral Resource Zones (MRZs) within California based on geologic and economic factors that identify the potential importance of mineral deposits in a particular area. According to the California Geologic Survey, the majority of the Project site is located within MRZ-1; a limited portion of the site is located within MRZ-4 (DOC 1982, 2017). The MRZ-1 zone applies to areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources; the MRZ-4 zone applies to areas where available information is inadequate to assign any other MRZ category (DOC 2017).

The City does not include a land use designation for mineral resources or extraction operations. Mining and extraction operations are not listed as a permitted or conditionally permitted use for any zone in the City's Zoning Ordinance.

Therefore, Project implementation would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state. No impact would occur.

Mitigation Measures: No mitigation is required.

- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?* **No Impact.**

Refer to Response 3.12(a), above. The Project site is not delineated as a locally important mineral resource recovery site. The Project would therefore 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.

Mitigation Measures: No mitigation is required.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or of applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The following analysis is based upon noise modeling data prepared by Michael Baker International (2025e; see Appendix F).

Fundamentals of Sound and Environmental Noise

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In terms of human response to noise, a sound 10 dBA higher than another is perceived to be twice as loud and 20 dBA higher is perceived to be four times as loud, and so forth. Everyday sounds normally range from 30 dBA (very quiet) to 100 dBA (very loud). On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by several sources, including mobile sources such as automobiles, trucks, airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have

an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are several metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 a.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. Noise levels described by L_{dn} and CNEL are similar and usually do not differ by more than 1 dBA. Additionally, the L_{max} , or maximum sound level, describes the highest sound level at a single event in which the sound level changes value as time goes on. Although L_{max} is important in evaluating an interference caused by a single noise event, L_{max} could not be totaled into a one-hour or a 24-hour cumulative measure of impact.

Fundamentals of Environmental Groundborne Vibration

Sources of groundborne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 3.13-1, *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels*, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for groundborne vibration are planes, trains, and construction activities such as pile driving and vibratory compacting activities which require the

use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

Table 3.13-1: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006–0.019	64–74	Range of threshold of perception.	Vibrations unlikely to cause damage of any type.
0.08	87	Vibrations readily perceptible.	Recommended upper level to which ruins and ancient monuments should be subjected.
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities.	Virtually no risk of architectural damage to normal buildings.
0.2	94	Vibrations may begin to annoy people in buildings.	Threshold at which there is a risk of architectural damage to normal dwellings.
0.4–0.6	98–104	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.	Architectural damage and possibly minor structural damage.

VdB = vibration decibels

Source: Caltrans, *Transportation Related Earthborne Vibrations*, 2002.

City of Escondido General Plan Noise Standards

California State Government Code Section 65302g mandates that noise elements be included as a part of city general plans and that cities adopt comprehensive noise ordinances. The City of Escondido General Plan Community Protection Element addresses noise mitigation regulations, strategies, and programs and delineates federal, state, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. Table 3.13-2, *City of Escondido Land Use Compatibility Matrix*, presents the City's Community Noise and Land Use Compatibility matrix and presents the land use compatibility chart for community noise adopted by the City through its General Plan. This table provides urban planners with a tool to gauge the compatibility of new land uses relative to existing and future exterior noise exposure levels. The General Plan also outlines the objectives and policies for noise control within the City. The following goal and policies are applicable to the Project:

Goal 5: Protection of the community from excessive noise exposure.

Noise Policy 5.1: Require development to meet acceptable exterior noise level standards as established in Figure VI-12 [Table 3.13-1] and use the future noise contour map (Figure VI-17) as a guide for evaluating the compatibility of new noise sensitive uses with projected noise levels.

Noise Policy 5.2: Apply a CNEL of 60 dB or less for single family and 65 dB or less for multi-family as goals where outdoor use is a major consideration (back yards and single-family housing developments, and recreation areas in multifamily housing developments) as discussed in Figure VI-13 (*Noise Measurement Guidelines*), and recognize that such levels may not necessarily be achievable in all residential areas.

Noise Policy 5.3: Require noise attenuation for outdoor spaces in all developments where projected incremental exterior noise levels exceed those shown in Figure VI-14 [Table 3.13-3, City of Escondido Exterior Noise Standards].

Noise Policy 5.5: Require construction projects and new development to ensure acceptable vibration levels at nearby noise-sensitive uses based on Federal Transit Administrator criteria.

Noise Policy 5.6: Require the preparation of noise studies, as deemed necessary by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14 [Table 3.13-3].

Noise Policy 5.7: Encourage use of site and building design, noise barriers, and construction methods as outlined in Figure VI-15 (*Noise Reduction Strategies*) to minimize impacts on and from new development.

Noise Policy 5.10: Require development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

Table 3.13-2: City of Escondido Land Use Compatibility Matrix

Land Use Category	Clearly Acceptable Community Noise Exposure	Normally Acceptable Community Noise Exposure	Conditionally Acceptable Community Noise Exposure	Normally Unacceptable Community Noise Exposure
Residential – Single Family, Duplex, Mobile Home	50 – 60	60 – 70	70 – 75	75 – 85
Residential – Multi-Family, Residential Mixed Use	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging, Motels, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 65	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	65 – 85	NA
Sports Arena, Outdoor Spectator Sports	NA	50 – 75	70 – 85	NA
Playgrounds, Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 75	NA	70 – 80	80 – 85
Office Buildings, Business Commercial, Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	80 – 85	NA

Community Noise Exposure shown as L_{dn} or CNEL, dBA; L_{dn} = Day-Night Sound Level; CNEL = community noise equivalent level; dBA = A-weighted decibel scale; NA = not applicable

Source: City of Escondido, *City of Escondido General Plan, Chapter IV, Community Protection, Section G, Noise*, Figure VI-12, *Land Use Noise Exposure Levels*, 2012.

Table 3.13-3: City of Escondido Exterior Noise Standards

Existing L_{dn} for Residences and Buildings Where People Normally Sleep ¹	Allowable Noise Increment for Residences and Buildings Where People Normally Sleep ¹	Existing Peak Hour L_{eq} for Institutional Land Uses with Primarily Daytime and Evening Uses ²	Allowable Noise Increment for Institutional Land Uses with Primarily Daytime and Evening Uses ²
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

L_{dn} = Day-Night Sound Level; L_{eq} = equivalent sound level

Notes: Noise levels are measured at the property line of the noise-sensitive use.

1 This category includes homes, hospitals, and hotels where a 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.

City of Escondido Municipal Code Noise Ordinance

The City regulates stationary source noise in Municipal Code Article 12, *Noise Abatement and Control*. The following noise regulations are applicable to the Project:

Sec. 17-229. Sound level limits

- (a) Unless a variance has been applied for and granted pursuant to this article, it shall be unlawful for any person to cause or allow the creation of any noise to the extent that the one-hour average sound level, at any point on or beyond the boundaries of the property on which the sound is produced, exceeds the applicable limits set forth in the following table (Table 3.13-4, *City of Escondido Noise Level Limits*), except that construction noise level limits shall be governed by Section 17-234 of this article.

Table 3.13-4: City of Escondido Noise Level Limits

Zone	Time	Applicable Limit One-hour Average Sound Level (Decibels)
Residential zones	7 a.m. to 10 p.m.	55
Residential zones	10 p.m. to 7 a.m.	45
Multi-residential zones	7 a.m. to 10 p.m.	55
Multi-residential zones	10 p.m. to 7 a.m.	50
Commercial zones	7 a.m. to 10 p.m.	60
Commercial zones	10 p.m. to 7 a.m.	55
Light industrial/Industrial park zones	Anytime	70
General industrial zones	Anytime	75

Sec. 17-234. Construction equipment.

Except for emergency work, it shall be unlawful for any person, including the City of Escondido, to operate construction equipment as follows:

- (a) It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of seven (7) a.m. and six (6) p.m. and on Saturdays between the hours of nine (9) a.m. and five (5) p.m., and provided that the operation of such construction equipment complies with the requirements of subsection (d) of this section.
- (b) It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the president, governor or City Council as public holidays.
- (c) No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of seventy-five (75) dB at any time, unless a variance has been obtained in advance from the City manager.
- (d) Persons engaged in construction for profit or as a business shall post signs at conspicuous places on a construction site, indicating hours of work as prescribed by this article or authorized by permit and the applicable noise level limits.

Sec. 17-238. Grading.

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

Existing Noise Environment

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptors to the Park are the single-family residences located approximately 100 feet, across Beven Drive to the south of the Park. However, a majority of the park improvements would occur approximately 1,000 feet to the north of these single-family residences. There is also an existing church located approximately 400 feet, across East Valley Parkway to the northeast of the Park. However, a majority of the park improvements would occur approximately 700 feet to the west of the church.

Existing Stationary Noise Levels

The primary sources of stationary noise in the Project vicinity are urban-related activities (i.e., mechanical equipment). The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Existing Roadway Noise Levels

Most of the existing noise in the Project area is generated from traffic along surrounding roadways such as East Valley Parkway and Beven Drive.

Existing Ambient Noise Levels

To quantify existing ambient noise levels near the existing sensitive receptors and the Project area, noise measurement from the *Noise Study Northeast Gateway Residential Development, Escondido, CA*, prepared by Ldn Consulting, Inc, dated March 10, 2022, has been utilized (Ldn Consulting 2022). The noise measurements shown in Table 3.13-5, *Noise Measurements*, are representative of typical existing noise exposure near the closest sensitive receptors to the Project site. Long-term (60-minute) measurement was taken from 2:00 p.m. Wednesday, February 9th to 2:00 p.m. Thursday, February 10th, 2022. The noise measurement location was at the northeast corner of East Valley Parkway and Beven Drive and measurement results are shown in Table 3.13-5.

Table 3.13-5: Noise Measurements

Time	Noise Levels (Leq)	Noise Levels (CNEL)
2:00 p.m.	60.5	60.5
3:00 p.m.	60.8	60.8
4:00 p.m.	61.7	61.7
5:00 p.m.	62.1	62.1
6:00 p.m.	64.4	64.4
7:00 p.m.	63.5	63.5
8:00 p.m.	61.8	66.8
9:00 p.m.	60.2	65.2
10:00 p.m.	59.6	64.6
11:00 p.m.	59.5	69.5
12:00 p.m.	56.0	66.0
1:00 a.m.	54.0	64.0
2:00 a.m.	51.8	61.8
3:00 a.m.	52.6	62.6
4:00 a.m.	53.7	63.7
5:00 a.m.	57.5	67.5
6:00 a.m.	61.9	71.9
7:00 a.m.	63.5	73.5
8:00 a.m.	63.9	63.9
9:00 a.m.	62.2	62.2
10:00 a.m.	60.9	60.9
11:00 a.m.	59.4	59.4
12:00 p.m.	67.8	67.8
1:00 p.m.	60.0	60.0
Overall	61.5	66.2

L_{eq} = equivalent sound level; CNEL = community noise equivalent level

Source: Ldn Consulting, Inc, *Noise Study Northeast Gateway Residential Development, Escondido, CA*, March 10, 2022.

Thresholds of Significance

Construction Noise Standards

The City of Escondido has a quantitative threshold that applies to noise levels at active construction sites. Based on the Municipal Code Section 17-238, to evaluate whether the proposed Project would generate potentially significant temporary construction, a construction-related noise level threshold of 75 dBA L_{eq} is used. Noise levels from construction equipment and activities were modeled using the Federal Highway Administration's (FWA) Roadway Construction Noise Model (RCNM).

Construction and Operational Vibration Standards

The Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* identifies various vibration damage criteria for different building classes. The nearest sensitive receptors are the single-family residential uses located south/southeast of the Project site, when measured from Project site boundary. Therefore, the architectural damage criterion for continuous vibrations at residential structures of 0.5 inch-per-second (in/sec) peak particle velocity (PPV) is applied in the analysis.

Stationary Noise Sources

The City regulates stationary source noise in Municipal Code Article 12, Noise Abatement and Control. As such, the City of Escondido's residential exterior noise standards would be applied when analyzing noise impacts for residential uses. A project would result in a significant impact if project-related operational (stationary-source) noise levels exceed the daytime exterior 55 dBA L_{eq} and nighttime exterior 45 dBA L_{eq} noise level standard at nearby sensitive receiver locations (refer to Table 3.13-4, above).

Mobile Noise Sources

The primary source of noise associated with the operation of the proposed Project would be from vehicular trips. An off-site traffic noise impact typically occurs when there is a discernable increase in traffic and the resulting noise level exceeds an established noise standard. According to California Department of Transportation (Caltrans), a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA).

DISCUSSION OF IMPACTS

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or of applicable standards of other agencies?*
Less than Significant Impact.

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., grading, paving, building construction). Noise generated by construction equipment, including graders and concrete saws, can reach high levels. During construction, exterior noise levels could affect the residential neighborhoods in the vicinity of the construction site. As discussed in the Master Plan, it is anticipated that the park improvements would be constructed in eight phases. However, for the purpose of this analysis, construction activities are assumed to occur in a single phase to assume a worst-case scenario. Construction of the proposed Project would include demolition, grading, building construction, paving, and architectural coating phases.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the site. Construction equipment produces maximum noise levels when equipment is operating under full

power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, or partial power. To more accurately characterize construction-period noise levels, the average (L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment simultaneously operating on part power.

Noise levels from construction equipment and activities were modeled using the FTA's Roadway Construction Noise Model (RCNM); refer to Appendix F, *Noise Modeling Data*, for results of the RCNM modeling. The construction equipment list is based on the California Estimator Model (CalEEMod), Version 2022.1; refer Appendix A, *Air Quality/Energy/Greenhouse Gas Emissions Modeling Data*. The quantity and type of equipment were then inserted into RCNM to quantify the estimated noise levels generated at each nearby sensitive receptor.

The Project proposes to enhance El Caballo Park through both new construction and upgrades to existing features. Planned improvements include equestrian facilities and trails, public picnic areas, a community hall building, maintenance facilities, educational spaces, public art installations, and pedestrian and bicycle connections to the Escondido Creek Trail, among other elements. Supporting amenities such as parking areas, bicycle storage, and spectator seating are also included. As previously stated, the majority of the construction activities would occur in the northern portion of the Project site. However, the Project also includes overflow parking lot improvements at the northwest corner of East Valley Parkway and Beven Drive. The nearest sensitive receptors are located approximately 100 feet south of the overflow parking lot improvements, measured from property lines. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment was assumed to operate simultaneously and be located at the construction area nearest to the affected receptors. In addition, construction activities would occur across the entire Project site. According to the General Noise Assessment methodology prescribed in the FTA *Transit Noise and Vibration Impact Assessment Manual*, for a large facility spreading out over considerable area with various noise sources with different noise levels, noise can be considered as concentrated at the center of the site.

Although the majority of construction activities would occur in the northern portion of the Project site, approximately 1,000 feet from the nearest residential receptor to the south—estimated noise levels have been conservatively calculated from the geographic center of the overflow parking lot improvements (on the northwest corner of East Valley Parkway and Beven Drive intersection). At this location, the geographic center would be approximately 230 feet from the closest sensitive receptors to the south.

The estimated construction noise levels at the nearest noise-sensitive receptors are presented in Table 3.13-6, *Construction Noise Levels at Nearest Sensitive Receptors*.

Table 3.13-6: Construction Noise Levels at Adjacent Residential Receptors

Phase	Distance to Nearest Sensitive Receptor (230 feet)
Demolition	73.2
Grading	74.3
Building Construction	73.0
Paving	68.2
Architectural Coating	60.4

Notes:

1 These noise levels conservatively assume the simultaneous operation of all heavy construction equipment at the same precise location. Modeled heavy construction equipment include concrete saw, dozer, and loaders during the demolition phase, grader, dozer, and loaders during the grading phase, crane, forklift, generator, loader, and welders during the building construction phase, cement and mortar mixer, paver, paving equipment, roller, and loader during the paving phase, and air compressor during the architectural coating phase.

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006 (see Appendix F, *Noise Modeling Data*).

As shown in Table 3.13-6, residential receptors could be exposed to temporary and intermittent noise levels ranging from 60.4 to 74.3 dBA L_{eq} , which would not exceed the City's 75 dBA L_{eq} threshold during construction activities. As previously stated, majority of the park improvements would occur on the northern portion of the Project site, as such, construction noise levels would be much lower than those presented in Table 3.13-6.

Further, the Project is also proposing improvements to the existing Escondido Creek which traverses on the eastern side of El Caballo Park and exists as a concrete-lined channel with a concrete bottom. The closest sensitive receptor to the Escondido Creek improvements is the existing church use located approximately 400 feet to the northeast, when measured from the Project site boundary. As shown in Table 3.13-6, construction noise levels would range from 60.4 to 74.3 dBA L_{eq} at 230 feet and would not exceed the City's 75 dBA L_{eq} threshold. It is also important to note that construction noise near sensitive receptors would be temporary and intermittent, and would diminish as construction activities move farther away from these receptors.

It should be acknowledged that the Project would adhere to the City's Noise Ordinance governing hours of construction and grading (Municipal Code Section 17-234 and Section 17-238). In accordance with these regulations, grading activities would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday, and construction activities would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. Grading and construction activities are not allowed on Sundays or holidays. Therefore, a less than significant impact would occur in this regard.

Long-Term Operational Impacts

Off-Site Mobile Noise

Future traffic generated by the proposed Project would result in some additional traffic on adjacent roadways, thereby potentially increasing vehicular noise in the vicinity of existing and proposed land uses. The most prominent source of mobile traffic noise in the Project vicinity is along East Valley Parkway.

The proposed Project would generate 60 average daily trips (ADT) on weekdays and 272 ADT on weekends (Michael Baker 2025f; see Appendix G). As previously stated, according to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA). Based on the *Local Mobility Analysis Northeast Gateway Assemblage*,

prepared by Linscott Law & Greenspan Engineers (LL&G 2022), existing ADT is approximately 35,209 along East Valley Parkway (between Beven Drive and Eureka Drive) and approximately 297 along Beven Drive (east of East Valley Parkway). As such, the Project-related increase in traffic volume along surrounding roadways would not result in a perceptible increase traffic noise level (less than 100 percent). Thus, a less than significant impact would occur in this regard.

Stationary Noise

Under existing conditions, El Caballo Park supports a variety of equestrian activities, including use by the Charros of Escondido to conduct charreadas and choreographed horse shows, as well as for equestrian shows and other cultural activities. Following implementation of the Master Plan, the park would continue to support ongoing equestrian training and riding opportunities in the community, as well as practice for the Charros. Additionally, the charreadas would continue to be held on Sundays. With the proposed improvements, the on-site facilities would be able to accommodate additional spectators, as expanded spectator seating would be provided in the form of bleachers, an amphitheater, and seating along the adjacent slope to the south. Additionally, the new facilities would include a bandstand for musical performances and an announcer's stage for announcing various events held at the arena and/or adjacent areas. It is anticipated that all events held at the park, whether it be for continued charreadas events or for public or private events (i.e., held at the community hall) would occur in conformance with City regulations for hours of operation which generally range from sunrise to sunset, and until 10:00 p.m. for special events.

In addition to the charreadas, special events may be held at the park. Such events may include equestrian events or shows or events held by private parties or organizations that would rent the facilities. The number of attendees would vary depending on the type of event; refer also to Table 2-2. As identified in the Master Plan, a community hall is also proposed that would offer a multi-use space, restrooms, office space, and kitchen/concessions space. The building is intended to provide an open hall space that can be used for both public and private events.

Stationary noise sources associated with the Project would include the operation of mechanical equipment, crowd noise during equestrian activities, and noise during bandstand for musical performances.

Mechanical Equipment Noise

Heating, ventilation, and air conditioning (HVAC) units would be installed on the roof of the proposed community hall building. Typically, mechanical equipment noise is approximately 66 dBA at 3 feet from the source (Berger, Neitzel & Kladden 2015). Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source (Harris 1994). The nearest sensitive receptor to the community hall building is the church use located approximately 525 feet to the east of the closest proposed rooftop HVAC units. Noise from the proposed HVAC units would be approximately 21 dBA at 525 feet, which would not exceed the City's Municipal Code noise standards of 55 dBA L_{eq} during daytime and 45 dBA L_{eq} during nighttime for single-family residences (conservatively, noise standards for single-family residential use have been used for the church). In addition, the proposed HVAC units' noise would be significantly lower than existing ambient noise levels and therefore would not be audible; refer to Table 3.13-5. Thus, the proposed Project would not result in significant noise impacts from HVAC units to the nearest sensitive receptors. Impacts in this regard would be less than significant.

Crowd Noise During Equestrian Activities

As previously stated, crowd noise is currently present under existing conditions. However, in addition to the charreadas, special events may be held at the park, up to an estimated 4-6 times per year. Such events may include equestrian events or shows (other than the charreadas) or events held by private parties or organizations that would rent the facilities. The number of attendees would vary depending on the type of event; refer also to Table 2-2. These activities have the potential to access the entire park facilities by groups of people intermittently. Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated at 60 dBA at one meter (3.28 feet) away for raised normal speaking. This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members (Hayne 2006). Therefore, crowd noise would be approximately 62 dBA at one meter from the source.

The closest sensitive receptor is the church use located more than 230 feet to the east of the Project site, when measured from Project's property line. At the distance of 230 feet, crowd noise would be reduced to approximately 25 dBA, which would not exceed the City's Municipal Code noise standards of 55 dBA L_{eq} during daytime for single-family residences. In addition, the crowd activity noise would be significantly lower than existing ambient noise levels and therefore would generally not be audible; refer to Table 3.13-5. As such, crowd noise generated during equestrian events or shows or events would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors. Impacts would be less than significant.

Bandstand/Musical Performances at the Arena

The Project proposes a bandstand for musical performances and an announcer's stage for announcing various events held at the arena and/or adjacent areas. Specific information related to the bandstand and the type of music is not available at this time. Typically, speaker noise is approximately 93 dBA at 4 feet from the source (Berger, Neitzel & Kladden 2015). The nearest sensitive receptor to the arena is the church use located approximately 750 feet to the east of the closest arena. Noise from the proposed speakers would be approximately 48 dBA at 750 feet, which would not exceed the City's Municipal Code noise standards of 55 dBA L_{eq} during daytime for single-family residences. In addition, the speaker noise would be significantly lower than existing ambient noise levels and therefore would not be audible; refer to Table 3.13-5. As such, speaker noise generated during equestrian events or shows or events would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Would the project result in the generation of excessive groundborne vibration or groundborne noise levels? **Less than Significant Impact.***

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver

building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration from construction activities rarely reach levels that damage structures.

The Caltrans *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. The closest sensitive receptor buildings are existing single-family residential buildings located approximately 115 feet to the south of the overflow parking improvement area. This evaluation uses the Caltrans architectural damage criterion for continuous vibrations at residential buildings of 0.2 inch-per-second (inch/second) PPV. The types of construction vibration impacts include human annoyance and building damage. Annoyance is assessed based on levels of perception, with a PPV of 0.01 inch/second being considered “barely perceptible,” 0.04 inch/second as “distinctly perceptible,” 0.1 inch/second as “strongly perceptible,” and 0.4 inch/second as “severe.” Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time.

Groundborne vibration levels associated with representative construction equipment are summarized in Table 3.13-7, *Typical Vibration Levels for Construction Equipment*.

Table 3.13-7: Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (inches-per-second) PPV	Approximate peak particle velocity at 115 feet (inches-per-second) PPV ¹
Vibratory roller	0.210	0.0390
Large bulldozer	0.089	0.0166
Loaded trucks	0.076	0.0142
Small bulldozer	0.003	0.0006

Note:

1 Calculated using the following formula:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$$

where: PPV (equip) = the peak particle velocity in inch-per-second of the equipment adjusted for the distance

PPV (ref) = the reference vibration level in inch-per-second from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

As indicated in Table 3.13-7, vibration velocities range between 0.003 inch/second PPV and 0.210 inch/second PPV at 25 feet. As previously stated, the closest sensitive receptor buildings are existing single-family residential buildings located approximately 115 feet to the south of the overflow parking improvement area and vibration velocities would be approximately 0.0006 inch/second PPV and 0.0390 inch/second PPV at 115 feet, which would not cause vibration levels to exceed the 0.2 inch/second PPV threshold at the closest residential structures. Therefore, impacts from vibration would be less than significant.

Mitigation Measures: No mitigation is required.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels? **No Impact.***

The nearest airport to the Project site is the Ramona Airport located approximately 10.5 miles to the southeast. Based on the *Airport Land Use Compatibility Plan for Ramona Airport*, adopted April 2022, the Project site is not located within a safety zone or noise exposure zone (San Diego County Airport Land Use Commission 2022). The Project site is not located within the vicinity of a private airstrip or related facilities. Project implementation would not expose people residing or working in the area to excessive noise levels associated with aircraft. No impact would occur.

Mitigation Measures: No mitigation is required.

3.14 Population and Housing

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

DISCUSSION OF IMPACTS

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?* **No 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 does not include the construction of new residential units that would generate population or increase the demand for housing. Due to the locally-serving nature and scale of the improvements, any new jobs created on-site (i.e., concession stand) would result in a nominal indirect impact on population growth and housing demand, as such jobs are anticipated to be filled largely by local residents of the City.

The Project does not propose the construction of any new roadways that would provide access to land areas that are currently inaccessible. Additionally, all infrastructure (water, sewer, stormwater, electricity) is present in the Project vicinity and either serves the site or adjacent properties under existing conditions. The Project would therefore not result in the provision of new access or infrastructure to areas where not already available.

Based on the above, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* **No Impact.**

The Project would not require the removal or replacement of any existing housing or residents as the subject site does not currently support any residential uses. No impact would occur.

Mitigation Measures: No mitigation is required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 following public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

DISCUSSION OF IMPACTS

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 following public services:

a) *Fire protection? **Less than Significant Impact.***

The Project would be served by the Escondido Fire Department. The Fire Department provides 24-hour fire, rescue, and emergency medical services to the City, including the Project site. The Fire Department also includes a Fire Prevention Division, Fire Operations Division, Fire Administrative Division, and Fire Support Services Division (City of Escondido Fire Department n.d.-a). Seven fire stations serve the City of Escondido. The closest fire station to the Project site is Escondido Fire Department Station 2, which is located approximately 1.7 miles southwest of the Project site at 421 N. Midway Drive. Escondido Fire Department Station 2 is currently staffed with a captain, one engineer, two firefighter paramedics, and one paramedic/emergency medical technician, and includes one Type 1 Fire Engine, one rescue ambulance, and one cross staffed Type 6 Brush Patrol Engine (City of Escondido Fire Department n.d.-b).

Project implementation would allow the improvements identified in the Master Plan to occur over time at existing El Caballo Park, which currently supports existing park and equestrian facilities, as well as surface parking. During construction, applicable regulations to ensure adequate emergency fire access would be required. Additionally, construction materials (i.e., wood, combustible materials, and fuel) would be secured to minimize fire hazards.

As discussed in Section 3.14, *Population and Housing*, Project implementation is not anticipated to result in a population increase compared to existing conditions due to the non-residential nature of the land use. Further, the Project would not result in a change in land use, compared to the existing condition; the site would still serve to support a public park offering opportunities for equestrian and recreational use. As a result, Project implementation would not require the construction of new or physically altered fire facilities and an increase in service calls is not anticipated. Nonetheless, the Project would be subject to Municipal Code Chapter 17.04, Fire Prevention Code, which adopts by reference the 2022 Edition of the California Fire Code, which includes site access requirements and fire safety precautions, among other related requirements.

As applicable, the Project would include features such as fire-resistant construction materials and fire alarm/sprinkler systems in all habitable structures (i.e., community hall building), fire hydrants, and adequate fire access for emergency vehicles. As applicable, the City's Fire Prevention Division would provide plan checks and inspections to verify the Project is designed and constructed pursuant to the City's Fire Code (City of Escondido n.d.-c). Upon approval of the plan check by the Fire Prevention Division, impacts concerning fire protection services would be less than significant.

The Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

b) Police protection? 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, approximately 3.8 miles southwest of the Project site. Police officers routinely patrol the City, resulting in varied response times.

Construction activities associated with the proposed Project may create a temporary increase in demand for police protection services at the site, such as potential security needs for staging areas on-site. However, construction activities would be subject to compliance with Municipal Code Section 6.1-2, Codes Adopted, 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 protection services during construction remain less than significant.

Due to the non-residential nature of the Project, Project operations would not directly or indirectly result in permanent population growth in the city that would impact existing service ratios. The Project would provide new or improved facilities at existing El Caballo Park and, as such, would not result in a change in land use at the Project site.

The Project as proposed may present a limited, gradual increase in demand on police personnel and resources due to the increased intensity of uses on the site as future improvements are phased over time; however, due to the nature of the park use and the intermittent occurrence of larger events that may be scheduled, it is not anticipated that the Project would substantially increase the need for police protection services. Therefore, Project implementation would not require the construction of new or physically altered police facilities and an increase in service calls is not anticipated.

As the Master Plan is implemented over time and specific design details are made available, the proposed improvements would be reviewed by police personnel, as appropriate, for proper site access and lighting details. Such review would ensure that public safety at the park facilities is maintained and that Police Department requirements are met.

The Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

c) ***Schools? Less than Significant Impact.***

The City of Escondido is served by the Escondido Union School District, Escondido Union High School District, and San Pasqual Union School District. Specifically, the Project site is located within the boundaries of the Escondido Union School District and the Escondido Union High School District. Schools serving the Project site include Escondido High School located at 1535 North Broadway; Hidden Valley Middle School located at 2700 Reed Road; and Orange Glen Elementary School located at 2861 East Valley Parkway.

Construction of the proposed improvements would be short-term and phased over time as funding becomes available. Any environmental impacts that would have the potential to impact school services would cease upon completion of Project construction. It is not anticipated that Project construction would include any lane closures or any design features that would disrupt the ability of schools to serve the community. Impacts on school services would be less than significant during construction.

Given the non-residential nature of the proposed development, the Project would not directly increase the population of the City and would not directly generate additional students within the affected school districts. As the Project would include improvements to an existing park, new employees at the Project site (i.e., concessions stand, ticket booth) would be limited and such jobs are not anticipated to indirectly generate a significant number of increased students in the City, if any.

The Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

d) ***Parks? Less than Significant Impact.***

General Plan Parks and Recreation Policy 2.3 of the Community Health and Services Element states the City's goal of providing a minimum of 5.9 acres of developed active neighborhood, community, and urban parks, in addition to 5.9 acres of passive park land/open space for habitat preservation and additional recreational opportunities, thereby totaling 11.8 active and passive acres per 1,000 dwelling units (City of Escondido 2012a).

The City of Escondido General Plan EIR Recreation Element indicates that the City's neighborhood, community, and school playground facilities total approximately 541 acres, of which 87.3 acres are undeveloped (City of Escondido 2012b). As of January 1, 2025, the City's population was estimated to be 150,425 with an estimated 50,883 housing units (DOF 2025). Assuming no additional park lands have been added in the City since that time, under existing conditions, park facilities would be deficient (50,883 units divided by 1,000 = 5,088; 5,088 divided by 541 acres = 9.4 acres per unit). Therefore, the City has a deficit of park land and open space based on General Plan Parks and Recreation Policy 2.3 (11.8 acres parkland/unit required).

An increase in the use of existing parks and recreational facilities typically results from an increase in housing or population in an area. The Project site currently supports El Caballo Park. The proposed Project would result in new improvements and enhancement of existing on-site park facilities to better support on-site equestrian operations and allow for improved active and passive recreational opportunities, as well as public and community events.

Although Project implementation may increase use of El Caballo Park as the intended improvements are made over time, no changes in the use of the site as a public park would occur. Given the non-residential nature of the proposed development, the Project would not directly increase the population of the City and would not directly generate additional population within the Project area that may increase demand on existing or the need for new neighborhood or regional parks or other recreational facilities. New employees at the Project site (e.g., concessions stand, ticket booth) would be limited and such jobs are not anticipated to indirectly generate new City residents.

The Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the 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 related to parks. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

e) *Other public facilities? **Less than Significant Impact.***

The nearest library to the subject site is the Escondido Public Library, located approximately 3.6 miles southwest at 239 South Kalmia Street. Services provided by the library include circulation of library materials such as books, magazines and video and audio recordings; internet access; word processing stations; copy machines; reading programs; and other services.

Due to the distance from the site, construction of the proposed Project would not result in any design features or lane closures that would impact other public facilities such as libraries. Impacts in this regard would be less than significant.

As indicated above, due to the non-residential nature of the Project, it is not anticipated that the Project would generate new demand for library or other public facility space, as an increase in population would not occur. The Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the 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 related to other public facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporation	Less Than Significant Impact	No Impact
16. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒	☐	☐

DISCUSSION OF IMPACTS

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

Refer to Response 3.15(d), Parks, above. Although the proposed improvements may increase use of El Caballo Park as the intended improvements are made over time, no changes to use of the site as a public park would occur. No new residential or other uses are proposed that would otherwise generate new housing or population that may increase the demand on neighborhood or regional parks or other recreational facilities.

Implementation of the El Caballo Park Master Plan is intended to provide “a public facility that incorporates equestrian-oriented activities, open space, community relations center, learning center, and fun” (City of Escondido 2014). Project implementation would not directly generate new or increased demand for parkland and would instead provide enhanced park facilities to serve City residents and visitors. The Project would not contribute to a substantial physical deterioration of recreational facilities, and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? **Less than Significant Impact with Mitigation Incorporated.***

Refer to Response 3.16(a), above. The Project would provide new and enhanced public park and recreational space that would be available for use by community residents and visitors to the City. The potential physical effects that may result with future construction and operation of the improvements envisioned in the El Caballo Park Master Plan are considered throughout this

IS/MND and, where necessary, mitigation measures are provided to reduce impacts resulting with implementation of the Master Plan to less than significant levels.

As indicated in Section 3.4, Biological Resources, direct and indirect impacts related to special status plant and wildlife species and associated habitat; wildlife movement; and/or jurisdictional aquatic resources may occur as the result of Project construction or operations, depending on the specific park improvements being undertaken and existing conditions at the time. Implementation of mitigation measures **BIO-1** to **BIO-11** would be required and include such measures as identification of site-specific impacts; pre-construction surveys; worker training; construction monitoring; and other such efforts to ensure that potential Project impacts are reduced to less than significant. Refer to Section 3.4 for specific mitigation measure language.

As indicated in Section 3.5, *Cultural Resources*, and Section 3.18, *Tribal Cultural Resources*, potential significant impacts on undiscovered cultural, tribal cultural, and paleontological resources may occur during Project construction. Mitigation measures **CUL-1** to **CUL-3** would be implemented to require archaeological and Native American monitoring during construction and evaluation and proper treatment of discovered resources, as appropriate. Implementation of mitigation measures **CUL-1** to **CUL-3** would be required to reduce Project impacts to less than significant. Refer to Section 3.5 for specific mitigation measure language.

With implementation of the mitigation measures identified, Project construction or expansion of recreational facilities on the Project site that may have an adverse physical effect on the environment would be reduced to less than significant.

Mitigation Measures: Implement Mitigation Measures **BIO-1** to **BIO-11** and **CUL-1** to **CUL-3**.

Level of Significance after Mitigation: Less than significant.

3.17 Transportation

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

The following evaluation is partially based on the *Vehicle Miles Traveled Assessment* prepared for the Project by Michael Baker International (2025f; see Appendix G).

DISCUSSION OF IMPACTS

- a) *Would the conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? **Less than Significant Impact.***

The Escondido General Plan Mobility and Infrastructure Element includes transportation goals, policies, and implementation programs that govern the system of roadways, intersections, bicycle paths, pedestrian ways, and other components and collectively provide for the movement of people and goods throughout the City. The following policies and implementation programs apply to the Project:

Complete Streets Policy 2.4: Evaluate access, safety, and convenience of various transportation modes for every project involving the following eight user groups: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.

The Project would include improvements to the existing on-site equestrian and park facilities, as well as construction of new facilities at El Caballo Park to enhance recreational opportunities and better connect area land uses. The proposed development would incorporate features that provide access, safety, and convenience for pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, and motorists, as well as for the provision of goods and services.

Pedestrian access would be improved throughout the park through a series of on-site walkways and bridges, including for crossing of Beven Drive, Wohlford Drive, and Save A Life Way, as well as the planned pedestrian bridge crossing over the Escondido Creek channel to connect Mayflower Dog Park with El Caballo Park. A proposed staging area, with connection to the Caballo Trail trailhead and Daley Ranch, would also be provided along the northern property boundary to enhance access between the Park and Daley Ranch.

The proposed improvements would not interfere with existing access routes along Beven Drive, Wohlford Drive, or Save A Life Way. Final Park design would ensure safe and efficient circulation is achieved for vehicles and trailers accessing the Park facilities and maneuvering through the site. Signage would also be provided as appropriate for wayfinding purposes.

Planned parking for disabled individuals and seniors would be provided via American with Disability Act (ADA)-accessible parking spaces with final design plans for the Park. Bike racks are proposed to provide bicyclists with parking on-site. The Project is located in proximity to one existing bus stop along the west side of East Valley Parkway, just south of Beven Drive, which is serviced by the North County Transit District (NCTD). Due to the nature of the use, Project operations are not anticipated to impact the movement of goods or services in the surrounding area. Thus, the Project would be consistent with Complete Streets Policy 2.4.

***Bicycle Network Policy 4.3:** Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.*

The Project would include on-site bicycle racks for bike parking to encourage bicycles as an alternative mode of transportation. The Project would be consistent with Bicycle Network Policy 4.3. As a public park, the proposed Project improvements are intended to increase access, safety, or convenience for pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services. Project operation as a public park would not conflict with area transportation modes.

Bicycle Facilities

The City's Bicycle Master Plan represents an implementation tool of the City of Escondido General Plan. However, the Bicycle Master Plan does not directly introduce any new goals beyond those identified in the General Plan.

Based on General Plan Figure ES-1, *Existing and Proposed Bicycle Facilities*, the closest bike lanes to the Project site are the existing and planned portions of the Escondido Creek channel Class II multi-use path, and the existing Class II bike lanes (on-street striped lanes) along the east and west sides of East Valley Parkway (City of Escondido 2012a). The Project would not hinder use of these bike lanes, and rather, would contribute to improvement of the path along Escondido Creek within the Project boundaries. Project operation would not impede implementation of the Bicycle Master Plan; no off-site improvements are proposed.

The Project would not conflict with a plan, ordinance, or policy addressing bicycle facilities. Impacts would be less than significant.

Transit Facilities

NCTD provides bus services in the City via 30 BREEZE routes (NCTD 2024). NCTD Route 388 generally provides local bus service between the Escondido Transit Center and Valley Center Drive, with connection to SR 76 (and beyond), and would serve the Project site (NCTD 2024). Route 388 includes a bus stop approximately 270 feet south of Beven Drive on the west side of East Valley Parkway. The Project would not interfere with the existing bus stop on East Valley Parkway. It is anticipated that any potential increase in ridership resulting with Project implementation (i.e., periodic attendance at weekend or special events) would be nominal and adequately accommodated by the existing bus system.

Rail Facilities

NCTD currently operates a commuter rail line (SPRINTER) that spans 22 miles and connects the cities of Escondido, San Marcos, Vista, and Oceanside through 15 stations that run along the SR 78 corridor. The closest SPRINTER station to the Project site is the Escondido Transit Center, approximately 4.3 miles to the southwest. The Project would not result in any design features, roadway improvements, or pedestrian walkway improvements that would interfere with the SPRINTER rail line.

Pedestrian Facilities

The Project includes pedestrian improvements, walkways, and trail connections to enhance the pedestrian experience and improve pedestrian connections. Planned improvements would be consistent with those identified in the El Caballo Master Plan, as well as the Escondido Creek Trail Master Plan for future Escondido Creek channel enhancements.

Although not anticipated, any temporary sidewalk closures on area streets or intersections while the proposed improvements are being installed would be short-term and are not anticipated to substantially disrupt pedestrian movement in the Project area or decrease the performance or safety of such facilities. Further, the Master Plan improvements would be phased, rather than constructed all at one time, thereby reducing the potential for substantial disruption to pedestrian circulation routes or access.

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?* **Less than Significant Impact.**

Pursuant to Senate Bill 743, vehicle miles traveled (VMT) is a measure of the total number of miles driven for various purposes and is sometimes expressed as an average per trip or per person. The thresholds of significance and screening criteria are provided in the *City of Escondido Transportation Impact Analysis Guidelines* (VMT Guidelines). The methodology in the VMT

Guidelines is consistent with the Office of Land Use and Climate Innovation's⁷ *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) and the Institute of Transportation Engineers' (ITE) *San Diego Regional Guidelines* (11th Edition), dated May 2019.

The Project was reviewed with the City's screening criteria to determine if a VMT analysis was necessary. The VMT Guidelines identify the following six cases where a development project would be screened out of VMT analysis, based on a presumption that its VMT effects would be less than significant.

1. **Small Residential and Employment Projects:** Projects that generate 200 or fewer new daily vehicles trips;
2. **Projects Located in a Transit-Accessible Area:** Projects located within one-half mile walking distance of an existing major transit stop or an existing stop along a high-quality transit corridor;
3. **Projects in a VMT-Efficient Area:** A VMT-efficient area is any area within the City with an average VMT/capita or VMT/employee below the threshold as compared to the baseline regional average provided by the San Diego Association of Governments (SANDAG) website;
4. **Local-Serving Retail:** Retail development less than 50,000 square feet are expected to draw at least 75 percent of customers from the local area;
5. **Local Serving Public Facilities:** Government, transit centers, parks, and public schools uses, etc.; and
6. **Redevelopment Projects with a Lower Total VMT:** Projects that replace an existing development with a more efficient land use.

Trip estimates for the Project were developed using specialized trip generation rates to calculate both daily and peak hour vehicle trips. Standard sources such as SANDAG *Not So Brief Guide for Trip Generation Rates in the San Diego Region* (2002) and the ITE *Trip Generation Manual* (11th Edition) do not provide specific trip rates for recurring special events like the Charreadas, held weekly at El Caballo Park. Therefore, estimated attendance figures—covering both weekday and weekend events, including spectators and participants—were provided by City staff. To estimate daily and peak hour trips, an average vehicle occupancy of 2.5 passengers per vehicle was assumed (Michael Baker 2025f).

The Project is forecast to generate approximately 20 weekday vehicle trips with 3 AM peak hour trips and 1 PM peak hour trip. On a weekend (Saturday or Sunday), the Project is forecast to generate 102 daily trips with 26 mid-day peak hour trips (Michael Baker 2025f).

⁷ The California Governor's Office of Planning and Research (OPR) was officially renamed the Governor's Office of Land Use and Climate Innovation (LCI), effective July 1, 2024. This change was mandated by Senate Bill 164, which was signed into law on June 29, 2024.

The Project meets the screening threshold of Small Residential and Employment Projects. As the Project is anticipated to generate an estimated 20 weekday daily trips and 102 weekend daily trips, below the 200 or fewer net new daily vehicle trip threshold, the Project meets this criterion and is presumed to have a less than significant VMT impact based on the screening criteria.

The Project also meets the screening threshold of Locally-Serving Public Facilities, wherein the Project is a public park. The Project is considered a locally-serving public facility and is presumed to have a less than significant VMT impact based on the screening criteria.

It should be noted that, as El Caballo Park is an existing park, the Project would not substantially increase the number of associated daily vehicle trips generated. Under existing conditions, the park is estimated to generate 40 weekday daily trips and 170 weekend daily trips. With the proposed improvements, the Project would result in 60 weekday daily trips and 272 weekend daily trips (Michael Baker 2025f).

For the reasons above, a detailed VMT analysis is not required. The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
Less than Significant Impact.

The Project does not propose any new roadways or improvements to existing off-site roadways. The Project would therefore not introduce roadway features (i.e., sharp curves, dangerous intersections) that could result in transportation-related hazards or safety concerns.

No park uses that would involve farm equipment or heavy machinery would occur. Due to the nature of the planned equestrian activities, Park activities would involve routine use of horse trailers and trucks to move horses, materials, and other supplies to/from the site. However, the movement of such vehicles on- and off-site occurs under existing conditions and can be accommodated by the existing roadway system without conflict.

The Project would not substantially increase hazards due to a geometric design feature or incompatible use. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- d) *Would the project result in inadequate emergency access?* ***Less than Significant Impact.***

Refer to Response 3.9(f). The Project would be designed to meet City and fire department standards for emergency access and circulation and no off-site roadway improvements are proposed that would alter established emergency vehicle routes or otherwise interfere with emergency access.

The Project design also includes a proposed emergency drive-through and turn-around loop from the northern end of Save A Life Way and adjacent to and along the proposed equestrian trailer parking area, west of Escondido Creek; refer to Figure 2-5, *Proposed Master Plan*. An emergency vehicular hammerhead is proposed in the northwestern portion of the site, between the therapeutic riding arena and the existing arena, to provide emergency vehicle access. As applicable, final improvement plans would be subject to review by City emergency personnel to ensure that emergency access is maintained.

During construction, materials would be placed within the Project boundaries adjacent to the current phase of construction to avoid any access conflicts. All construction-related activities would be required to comply with City standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services.

The Project would not result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause 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, that is:				
a) Listed or eligible for listing in the California Register if Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?; or,	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 3024.1. In applying the criteria set for in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe?	☐	☒	☐	☐

The following discussion considers the findings of the *Phase I Cultural Resources Assessment* prepared by Michael Baker International (2025c; see Appendix C) and the results of formal consultation with Native American tribal members, pursuant to requirements of California Assembly Bill (AB) 52.

DISCUSSION OF IMPACTS

- a) *Would the project cause 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, that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?* **Less than Significant with Mitigation Incorporated.**

California AB 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (California PRC Section 21084.2).

As discussed in Section 3.5, *Cultural Resources*, the site does not support any listed or eligible historical or cultural resources, as defined by PRC Section 5020.1(k). Two cultural resources were identified and evaluated for eligibility to the National Register of Historic Places and the California

Register of Historical Resources: the Asociación de Charros de Escondido Arena and a series of historic period retaining walls associated with the Dixon family (MBI-El Caballo-01H).

The Asociación de Charros de Escondido Arena was evaluated as ineligible for both the National Register and California Register. Based on such findings, no further evaluation was recommended.

The four terraced wall segments are located along a hillside west of Save A Life Way and appear to have been used to prevent erosion and to support citrus crops and a dirt road near the edge of the hillside. As the location of the retaining wall features lie outside of the proposed Project footprint, Project implementation would not affect this resource (Michael Baker 2025c).

In compliance with AB 52, the City distributed letters via US mail on October 24, 2024 to a total of 20 Native American tribes, notifying each tribe of the opportunity to request consultation with the City regarding the proposed Project. A follow-up email was also sent to each tribe indicating that the City had mailed the initial notification regarding the opportunity to consult. The tribes were identified based on a list of tribes provided by the Native American Heritage Commission (NAHC) on July 1, 2024. Pursuant to AB 52, the tribes had 30 days to respond to the City's notification.

Of the total 20 tribes notified, five tribes responded requesting formal consultation under AB 52. On January 29, 2025, the City subsequently emailed to each of the five tribes the *Phase I Cultural Resources Assessment* (Michael Baker 2025c) prepared for the Project.

A site walk was also organized by the City, and all tribes who requested consultation were invited to attend. The site visit occurred on May 30, 2025 and was attended by representatives from the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians. The purpose of the site walk was to allow tribal members to view the site and to ask any questions regarding the proposed improvements. No tribal cultural resources were identified during the site walk.

The Campo Band of Diegueno Mission Indians responded via email to the City's initial notification on November 22, 2024, requesting formal consultation pursuant to AB 52. As noted above, the City provided the tribe with the *Phase I Cultural Resources Assessment* on January 29, 2025. The City sent a subsequent inquiry to the tribe on August 27, 2025, offering to schedule a meeting to allow for further discussion of the Project, as well as the May 2, 2025 invitation to participate in the organized site visit; no further communication was received. On March 12, 2026, the City sent a final letter to the tribe, asking the tribe to confirm conclusion of consultation within 15 days; no response was received and the City considered consultation closed.

The Pala Band (Pala Band) of Mission Indians responded in a letter dated November 25, 2024, requesting formal consultation pursuant to AB 52. The Pala Band indicated that the Project site is not within the boundaries of the recognized Pala Indian Reservation, but that it does lie within the boundaries of the territory that the tribe considers its Traditional Use Area, or that it is situated in close proximity to the Reservation, and that information generated would likely be useful in better understanding regional culture and history. The tribe requested to review available documentation pertaining to the proposed Project, which the City provided on January 29, 2025 (see above). The City met virtually with tribal representatives from the Pala Band on February 21, 2025 and August 12, 2025. The information and recommendations provided by the tribe have been considered in preparing this IS/MND. On November 26, 2025, the City sent a follow-up letter to the tribe, asking

the tribe to confirm conclusion of consultation within 30 days. On December 3, 2025 the Pala Band replied to the City via email agreeing to conclude consultation.

The Rincon Band of Luiseño Indians responded in a letter dated November 12, 2024, requesting formal consultation pursuant to AB 52. The tribe indicated that the Project site is located within the Traditional Use Area of the Luiseño people and that the tribe is therefore traditionally and culturally affiliated with the Project area. The tribe requested copies of existing documents pertaining to the Project and noted the desire to consult on the Project in order to learn more about any potential impacts to cultural resources. The City subsequently provided the *Phase I Cultural Resources Assessment* prepared for the proposed Project via email on February 13, 2025, and met virtually with the tribe on February 21, 2025. Tribal members attended the May 30, 2025 site visit, and the City met again virtually with tribal representatives on July 24, 2025. The City provided a revised copy of the *Phase I Cultural Resources Assessment* to the tribe via email on November 7, 2025, and met virtually with tribal members on November 12, 2025. The tribe provided a follow-up letter dated November 14, 2025 that included additional comments. The City has considered the information and recommendations provided by the tribe during consultation in preparing this IS/MND. On November 26, 2025, the City sent a follow-up letter to the tribe, asking the tribe to confirm conclusion of consultation within 30 days. On December 23, 2025, Rincon Band replied to the City via email agreeing to conclude consultation.;

The San Luis Rey Band of Mission Indians responded in a letter dated November 8, 2024, requesting formal consultation pursuant to AB 52. The tribe requested available information pertaining to Project alternatives, mitigation measures, potential impacts, environmental review, and any completed cultural studies. The City subsequently provided the tribe with the *Phase I Cultural Resources Assessment* prepared for the proposed Project on January 29, 2025. Tribal members attended the May 30, 2025 site visit, and the City consulted virtually with tribal representatives on August 6, 2025. The City has considered the information and recommendations provided in preparing this IS/MND. On November 26, 2025, the City sent a follow-up letter to the tribe, asking the tribe to confirm conclusion of consultation within 30 days; no response was received and the City considered consultation closed.

The San Pasqual Band of Mission Indians replied in a letter dated October 24, 2024, requesting formal consultation pursuant to AB 52. The tribe indicated that the Project site is not within the boundaries of the recognized San Pasqual Indian Reservation, but that it is within the territory's boundaries that the tribe considers its Traditional Use Area. The tribe requested to review available cultural resource reports that have been or will be available during the environmental review. On January 29, 2025, the City emailed the *Phase I Cultural Resources Assessment* prepared for the proposed Project to the tribe. The City consulted virtually with tribal representatives on August 6, 2025, and has considered the information and recommendations provided by the tribe in preparing this IS/MND. On March 12, 2026, the City sent a final letter to the tribe, asking the tribe to confirm conclusion of consultation within 15 days; no response was received and the City considered consultation closed.

As detailed in Response 3.5(a) in Section 3.5, *Cultural Resources*, no historic resources listed or eligible for listing in a state or local register of historic resources are located on the Project site. No tribal cultural resources that could be impacted by the Project have been identified through the AB 52 consultation procedures. Therefore, no impacts related to known historic tribal cultural resources as defined in PRC Section 5020.1(k) would occur.

However, excavation activities during Project construction would have the potential to unearth unknown or previously undisturbed tribal cultural resources. Implementation of mitigation measures **CUL-1** to **CUL-3** would ensure that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 5024.1(c). Impacts would be reduced to less than significant with mitigation incorporated.

Mitigation Measures:

Implement mitigation measures **CUL-1** to **CUL-3**.

Level of Significance after Mitigation: Less than significant.

- b) *Would the project cause 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, that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 3024.1? In applying the criteria set for in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe? **Less than Significant Impact with Mitigation Incorporated.***

As noted above, while no specific tribal cultural resources that would be impacted by the Project have been identified, mitigation measures **CUL-1** to **CUL-3** would be implemented to reduce potential impacts to unknown tribal cultural resources, including human remains. With incorporation of mitigation measures **CUL-1** to **CUL-3**, Project impacts would be reduced to less than significant.

Mitigation Measures:

Implement mitigation measures **CUL-1** to **CUL-3**.

Level of Significance after Mitigation: Less than significant.

3.19 Utilities and Service Systems

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

DISCUSSION OF IMPACTS

- a) *Would the project require or result in the relocation or reconstruction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? **Less than Significant Impact.***

In support of the El Caballo Park Master Plan, a site utility inventory was conducted to provide a general assessment of public utilities serving the Project site and surrounding area; refer to Figure 2-6, *Existing Utilities*. Prior to design development for implementation of the specific improvements proposed, an accurate survey would be conducted to determine the location of all utilities and to determine any needed improvements (City of Escondido 2014).

Water

El Caballo Park site is served by the City of Escondido Utilities Department. The Utilities Department consists of three different divisions: the Water Division; the Wastewater and Water Reuse Division; and the Construction and Engineering Division. Refer also to Figure 2-6, *Existing Utilities*. The City of Escondido manages two fresh water lakes, Dixon Lake and Lake Wohlford, which provide an estimated 15 percent of the City's water supply and contribute to the City's primary storage facilities for local potable water.

Water service to the Project site would continue to be provided by the City via existing connections or through limited on-site extension of water lines to serve the various areas where new facilities or improvements are proposed. No upgrades to the existing public water infrastructure system are currently proposed at the Master Plan level; however, as appropriate, Project water demands would be calculated with future improvements to ensure that all facilities can be adequately served at the time of final design and construction. Refer also to Response 3.19(b), below.

The Project may demolish existing on-site lateral connections and/or construct new on-site water line connections; however, as existing water lines are available on-site, the construction of such improvements has been considered in evaluations in this Initial Study for the potential to result in environmental impacts and mitigated for as appropriate. It is not anticipated that other new or expanded water infrastructure facilities would be necessary. A less than significant impact would occur in this regard.

Wastewater Treatment

Sewer services are provided by the Wastewater and Water Reuse Division of the City's Utilities Department. All of the City's wastewater generated is routed to and treated at the City-owned and operated HARFF, located at 1521 S. Hale Avenue. Existing sewer lines are present to the north of El Caballo Park, serving the San Diego Humane Society, and east of Escondido Creek, serving Mayflower Dog Park and Hidden Valley Obedience Club; refer to Figure 2-6, *Existing Utilities*.

All existing or proposed gravity sewers would be designed to convey peak dry weather flows in accordance with the City of Escondido *2012 Wastewater Master Plan*. As appropriate, Project wastewater demands would be calculated with future improvements to ensure that all facilities can be adequately served at the time of final design and implementation. Refer also to Response 3.19(c), below.

No upgrades to the existing public sewer infrastructure system are currently proposed with implementation of the El Caballo Park Master Plan to serve the Project as designed; rather, it is anticipated that the Project would connect to existing sewer lines on-site or in the near vicinity. As existing sewer lines are available on-site (or in close proximity), the construction of such improvements has been considered in evaluations in this Initial Study for the potential to result in environmental impacts, and mitigated for as appropriate. It is not anticipated that other new or expanded wastewater infrastructure facilities would be necessary. A less than significant impact would occur in this regard.

Stormwater Drainage

Stormwater facilities in the Project vicinity are maintained by the City's Utilities Department. Under current conditions, stormwater from the Project site discharges to Escondido Creek; refer to Figure 2-6, *Existing Utilities*. Drainage and stormwater quality treatment for the Project would be designed to treat stormwater runoff originating from the Project site and specific use areas as close to the points of generation as possible. Off-site flows would be diverted so as to not interfere with or overload treatment facilities designed to treat smaller specific areas. Existing off-site flows would pass through and/or around the Project site untreated and un-detained.

Under existing conditions, the main off-site flows entering the Project site are in the form of a natural channel that concentrates runoff from the adjacent hills and the overflow of Lake Dixon. The channel traverses the park from the northwest to the southeast with connection to the

Escondido Creek channel. The channel is partially vegetated, partially concrete-lined, and partially rock-lined. Proposed improvements include minor grading to improve the edges at the lower end; revegetation of native plants; and removal of existing concrete sides to be replaced with softened edges and vegetation.

A new on-site culvert crossing is proposed for vehicular access and would include upstream and downstream riprap. This culvert would be designed to convey 100-year flows without overtopping. A second pedestrian crossing is proposed on-site, upstream from the vehicular crossing and is anticipated as a clear-span walkway deck that would not impact flow within the channel.

On the east side of Escondido Creek, the existing dirt lot that would be converted to an overflow decomposed granite parking lot that currently drains westerly via sheet flow and shallow concentrated flow towards a curb inlet that discharges into Escondido Creek. No substantial hydrologic or hydraulic changes are proposed for this area. It is anticipated that new storm drain and area drains would be installed within the decomposed granite parking lot to facilitate drainage during intense storms and reduce future maintenance.

The Master Plan also considers future conversion of the segment of Escondido Creek that traverses the Project site (approximately 1,300 linear feet) to a more natural state by removing the existing concrete sides and a portion of the concrete bottom and replacing them with native vegetation to achieve a more natural solution to stormwater drainage. To reduce the potential for reduced capacity and potential off-site flooding from the overgrowth of vegetation, installation of a channel bottom constructed of rock, concrete, or modular cells is recommended to reduce erosion where vegetation may not be established within the channel (Michael Baker 2024).

As the Project has been envisioned at a Master Plan level, site-specific engineering design would be required as the various components are implemented.

Although future development of the subject property would result in the addition of impervious surfaces on-site, the Project would not substantially change existing drainage patterns, nor increase the rate or volume of stormwater runoff from the subject property. The Project would be required to implement best management practices (BMPs) in conformance with the City's Stormwater Design Manual and Municipal Code Chapter 22-26 requirements to reduce long-term water quality impacts. All proposed stormwater infrastructure improvements and site grading would be subject to City discretionary review and approval of a grading permit.

A less than significant impact would occur in this regard.

Dry Utilities

Electricity and natural gas services to the Project area are provided by San Diego Gas & Electric. Electrical lines extend into the site and serve on-site uses at the park; refer to Figure 2-6, *Existing Utilities*. The Project would tie into such existing services and it is not anticipated that additional transmission lines or system upgrades would be required to convey electricity to the site. However, the need for any new connections for service would be determined at the time when detailed design plans are prepared for the specific improvements proposed.

No natural gas lines extend into the Project site under existing conditions. Such utilities may be extended from adjacent properties to the site (i.e., to serve the community hall); however, the

need for any new connections for service would be determined at the time when detailed design plans are prepared for the specific improvements proposed.

The Project would be required to comply with applicable local, state, and federal laws regarding the installation of dry utilities. Due to the nature of the Project and the existing developed condition, the Project is not anticipated to require the expansion of utility services, and compliance with applicable regulations would ensure that environmental impacts from dry utilities installation on-site would be minimized. As such, a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*
Less than Significant Impact.

As discussed above, the Water Division would provide public water services to the Project site. Based on the City of Escondido's *Urban Water Management Plan (UWMP)*, the City currently sources its raw water supplies from local surface water and imported water from the San Diego County Water Authority (SDCWA) and San Luis Rey Indian Water Authority (SLRIWA). Raw water supplies are then treated at the Escondido-Vista Water Treatment Plant which is co-owned by the City and the Vista Irrigation District.

The UWMP forecasted the City's water demand up until 2045 based on land use; refer to Table 3.19-1, *City of Escondido Projected Demands for Water*. Based on the UWMP, the City plans on increasing the production of recycled water that would be used primarily for non-potable landscape irrigation and agricultural irrigation uses; refer to Table 3.19-2, *City of Escondido Total Gross Water Use*. Table 3.19-2 is also representative of the City's normal water demands. During periods of dry years, the City would use imported water from the SDCWA, imported water from the SLRIWA, and surface water reservoirs (Henshaw and Wohlford Reservoirs); refer to Table 3.19-3, *City-wide Single Dry Year Supply and Demand*. Based on the UWMP, the City's water supply and demand during five consecutive dry years would be similar to a single dry year supply and demand. As such, Table 3.19-3 for one single dry year is representative of the water supply and demand in the City during five consecutive dry years.

Table 3.19-1: City of Escondido Projected Demands for Water

Use Type	Additional Description	2025*	2030*	2035*	2040*	2045*
Single-Family	-	9,470	9,560	9,652	9,749	10,085
Multi-Family	-	4,582	4,625	4,670	4,717	4,879
Commercial	-	2,136	2,156	2,177	2,199	2,275
Industrial	-	87	88	89	90	93
Institutional	-	592	597	603	609	630
Landscape	Served by dedicated irrigation meters	2,110	2,130	2,151	2,172	2,247
Agricultural Irrigation	-	4,160	4,200	4,240	4,283	4,430
Sales/Transfers/Exchanges to other Suppliers	Sales to Rincon del Diablo Municipal Water District**	454	458	463	467	483
Losses	-	2,249	2,271	2,293	2,316	2,396
Total	-	25,839	26,086	26,337	26,602	27,518

Notes:

*Water demand units are in acre-foot (AF) which represents the volume of water that would cover one acre to a depth of one foot. This is equivalent to 325,851 gallons. The projected water use is reported to the extent that records are available.

**The City of Escondido provides a small amount of water to Rincon del Diablo Municipal Water District, a neighboring water agency.

Source: City of Escondido, *City of Escondido 2020 Urban Water Management Plan*, Table 4-6, Projected Demands for Water, 2021.

Table 3.19-2: City of Escondido Total Gross Water Use

Water Use Type	2020	2025	2030	2035	2040	2045
Potable Water, Raw, Other Non-potable (refer to Table 19-1) ¹	20,627	25,839	26,086	26,337	26,602	27,518
Recycled Water Demand ¹	464	3,935	4,105	7,585	7,665	7,745
Total Water Use¹	21,091	29,774	30,191	33,922	34,267	35,263

Notes:

¹ Water demand units are in acre-foot (AF) which represents the volume of water that would cover one acre to a depth of one foot. This is equivalent to 325,851 gallons.

Source: City of Escondido, *City of Escondido 2020 Urban Water Management Plan*, Table 4-8, Total Gross Water Use, 2021.

Table 3.19-3: City-wide Single Dry Year Supply and Demand

Supply or Demand Description	2025	2030	2035	2040	2045
Potable Supplies ¹ : Purpose or Imported Water - SDWCA	19,153	19,323	15,551	14,791	15,712
Potable Supplies ¹ : Purpose or Imported Water - SLRIWA	7,900	7,900	7,900	7,900	7,900
Potable Supplies ¹ : Surface Water - Henshaw and Wohlford Reservoirs	551	551	551	551	551
Potable Supplies ¹ : AWT for Potable Reuse ²	0	0	4,000	5,000	5,000
Potable Supply Total	27,603	27,781	28,002	28,242	29,163
Potable Demands	27,603	27,781	28,002	28,242	29,163
Difference between Potable Supply Total and Potable Demands	0	0	0	0	0
Non-Potable Supplies ¹ : MFRO for Agricultural Users ³	3,400	3,400	6,800	6,800	6,800
Non-Potable Supplies ¹ : HARRF for All Other Users ⁴	3,650	4,400	4,400	4,400	4,400
Non-Potable Supply Total	7,050	7,800	11,200	11,200	11,200
Non-Potable Demands	3,935	4,105	7,585	7,585	7,745
Difference⁵ between Non-Potable Supply Total and Non-Potable Demands	3,115	3,695	3,615	3,615	3,455

Notes:

1 Water demand units are in acre-foot (AF) which represents the volume of water that would cover one acre to a depth of one foot. This is equivalent to 325,851 gallons.

2 AWT stands for Advanced Water Treatment

3 MFRO stands for Membrane Filtration Reverse Osmosis

4 HARRF stands for the Hale Avenue Resource Recovery Facility which treats influent from the entire City.

5 The City is projecting that they would produce more non-potable supplies compared to the City's projected demand.

Source: City of Escondido, *City of Escondido 2020 Urban Water Management Plan*, Table 7-4, Single Dry Year Supply and Demand Comparison, 2021.

Due to the nature of the proposed Project, the estimated annual water demand would represent a fraction of the City's total current and projected future water demand. Potable water would be required for the concession stand, restrooms, community hall building, caretaker's residence, maintenance building, and drinking fountains, and for landscaping irrigation and routine maintenance, as appropriate. The proposed Project would be consistent with the existing land use designation and zoning for the site and does not represent a use inconsistent with land use assumptions made in the UWMP.

The Project would also be required to comply with water efficiency standards in the California Building Energy Efficiency Standards and California Green Building Standards Code, as applicable to the improvements proposed. As appropriate to the specific improvements to be implemented, calculation of water demand and determination of adequate water supply connections and/or upgrades would be undertaken to ensure that the Project facilities can be served with no adverse effect on existing water supply systems or services.

For the reasons above, the Project is not anticipated to exceed the General Plan buildout assumptions used in the UWMP. The Project is expected to have sufficient water supplies available to serve the proposed facilities and reasonably foreseeable future development during normal, dry, and multiple dry years. A less than significant impact would occur.

Mitigation Measures: No mitigation is required.

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

Based on Table 6-1 of the UWMP, *Wastewater Collected Within Service Area in 2020*, the City collected a total of 15,580 acre-feet yards per year (or approximately 5 billion gallons of wastewater per year) within the UWMP service area in 2020. The collected wastewater is treated by the HARFF, which uses a tertiary treatment process that then disposes in an ocean outfall (City of Escondido 2021).

As discussed under Response 3.19(b), the Project as proposed would not create a substantial increase in water demand, a percentage of which would then become wastewater requiring treatment. Due to the limited nature of the Project, it is anticipated that wastewater generated by the proposed improvements could be adequately accommodated as a fraction of the 5 billion gallons of wastewater annually treated at the HARFF. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? **Less than Significant Impact.***

Escondido Disposal Incorporation provides solid waste collection for the City, including the Project site, and disposes of over 99 percent of the City's solid waste at the three landfills identified in Table 3.19-4, *Landfills Serving the City of Escondido* (CalRecycle 2019).

Table 3.19-4: Landfills Serving the City of Escondido

Name/Location	Amount Disposed by the City in 2019 (tons per day) ¹	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Otay Landfill, 1700 Maxwell Rd Chula Vista, CA 91911	2,080	6,700	11,307,565	2/28/2030
Sycamore Landfill 8514 Mast Boulevard at West Hills Pkwy San Diego, CA 92145	87,169	5,000	99,477,838	12/31/2042
West Miramar Sanitary Landfill 5180 Convoy Street San Diego, CA 92111	932	8,000	11,080,871	1/1/2031

¹ The 2019 data is last available data for the landfills shown.
Source: CalRecycle 2019; 2025a; 2025b; 2025c.

Construction

The proposed Project would enhance the existing facilities at El Caballo Park. Some hauling of construction and demolition materials would occur throughout the construction phases as the Project elements are implemented over time. This quantity of materials is not anticipated to generate significant quantities of solid waste that would affect the capacity of the landfills serving

the City. Existing landfills serving the City currently have adequate space, and demolition debris from the Project site is not anticipated to contribute to a substantial percentage increase over current daily disposal rates.

All construction activities would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. Specifically, the Project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible.” The act requires that at least 50 percent of waste produced is recycled, reduced, or composted. The Project would be required to demonstrate compliance with the 2022 Green Building Code, as adopted by the City (Municipal Code Article 1, Section 6.1-2) which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Prior to issuance of a demolition or building permit, the Project would require preparation of a Construction Waste Management Plan to achieve the reuse, salvage, or recycling of 65 percent of all construction and demolition debris generated (City of Escondido n.d.).⁸ Compliance with these regulations and the Construction Waste Management Plan would ensure that the Project’s construction-related solid waste impacts would remain less than significant.

Operation

The Project would enhance an existing public park which currently generates limited operational waste on a daily basis; events held on weekends or on occasion throughout the year intermittently generate increased levels of solid waste due to increased numbers of visitors, as compared to daily use.

Any increase in solid waste generation with the Project is not anticipated to be substantial in quantity, or to adversely affect the capacity of the landfills serving the City, as the landfills have sufficient capacity; refer to Table 3.19-4. Solid waste generation would not exceed the typical daily amount of waste disposed by the City into the Otay Landfill, Sycamore Landfill, or West Miramar Sanitary Landfill. As such, the Project would not result in a significant increase in solid waste generation that would impair the capacity of the landfills serving the City. Impacts in this regard would be less than significant.

Routine maintenance of the equestrian and park facilities is anticipated to be similar to that which occurs under existing conditions. All arenas, corrals, round pens, and other equestrian facilities would be routinely maintained and cleaned on a daily basis to ensure proper management and removal of animal waste. A muck storage area (covered) is proposed in the northeastern portion of the site to accommodate and maintain animal waste on-site. All animal waste would be properly handled and disposed of in accordance with standard procedures, similar to that which presently occurs.

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

⁸ Construction and demolition debris may include, but is not limited to, asphalt, concrete, brick, dirt, rock, lumber, cardboard, metals and any vegetative or other land clearing/landscaping materials.

Mitigation Measures: No mitigation is required.

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

Refer to Response 3.19(d), above. The Project would be served by an existing waste handling service, provided by Escondido Disposal Incorporation. Escondido Disposal Incorporation operates consistent with federal, state, and local statutes and regulations, and landfills serving the Project site would also conform to all applicable statutes and regulations. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.20 Wildfire

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

DISCUSSION OF IMPACTS

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? **Less than Significant Impact.***

Refer to Response 3.9(f), under Hazards and Hazardous Materials. The City of Escondido participates in implementing the County of San Diego's *Emergency Operation Plan* which provides insight on the mobilization of public and private resources on a County level during a state of emergency. The City of Escondido also participates in implementing the San Diego County Multi-Jurisdictional Hazard Mitigation Plan which addresses planned response to potential large-scale disasters that represent unique situations requiring unusual emergency responses.

According to the San Diego County's *Emergency Operations Plan, Annex Q – Evacuation*, the closest major evacuation route from the Project site is I-15, located approximately 4.1 miles to the southwest (San Diego County 2022). Locally, the Escondido General Plan Community Protection Element identifies Bear Valley Parkway/East Valley Parkway/Valley Center Road as designated evacuation routes, along with all other roadways identified in the City's General Plan Mobility Element (Figure VI-1, *Emergency Evacuation Routes*; City of Escondido 2012a).

The Project does not propose any components that would impair emergency response or evacuation during construction or operations. No off-site roadway improvements are proposed that would alter existing vehicular circulation patterns. The provision of emergency services to the

site and surrounding properties would not be impacted as primary access to all major roads would be maintained with Project implementation.

The Project would not substantially impair or physically interfere with an adopted emergency response or evacuation plan. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

As shown in Figure 2-3, *Existing Conditions*, prevailing winds in the site vicinity are generally from the south and west. The overall Project area where improvements are proposed is generally flat or gently sloping under current conditions. On-site areas outside of the Project footprint do support lands of increased slopes, with steep slopes (generally 25 percent slope or greater) present in the western and southern portions of the site (City of Escondido 2012a). Existing surface parking areas are relatively flat and do not support steep slopes.

According to CalFire's Hazard Severity Zone Map, the Project site is located within a Very High Fire Danger/Hazard Severity in an LRA. Such conditions indicate an increased risk for potential wildfire occurrence. Similarly, all lands adjoining the site are designated as having a high risk for wildfire hazard (CalFire 2025).

Due to off-site and on-site conditions, the proposed improvements may have the potential to exacerbate wildfire risks or otherwise expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, the Project site is currently utilized for similar equestrian and recreational uses, and development of the site as proposed would not change the existing land use.

Operations at El Caballo Park would be required to comply with applicable City Department of Parks and Recreation regulations, including for the use of barbecues (BBQs). Such restrictions may pertain to the use of open flames outside of designated areas; within the vicinity of natural habitat zones; use of large smokers or commercial-style cookers without a special event permit; and/or, any device that violates fire-safety rules during high fire risk periods. During Red Flag warnings, all outdoor wood-burning fires are prohibited, and extreme caution is advised with charcoal. The Master Plan identifies a picnic area with BBQ grills in the northwestern portion of the Project site. Use of such facilities would therefore occur in conformance with any applicable City restrictions and may become prohibited during high wind events or conditions resulting in heightened wildfire risk.

Habitable structures (i.e., community hall building, caretaker's residence) would be required to meet design standards to the satisfaction of the Escondido Fire Department and would be designed and constructed to meet City of Escondido Fire Code requirements (Municipal Code Chapter 11, Article 2, Division 1; Ordinance 2022-04, adopted December 7, 2022) and/or California Fire and Building Code requirements in effect at the time of construction to ensure public safety and to minimize the risk of wildfire occurrence or spread.

As appropriate, the Project would be required to provide fuel management zones around on-site habitable buildings (i.e., community hall, caretaker's residence), which would be irrigated with a low-volume, drip irrigation or equivalent and planted with less flammable plant material. As shown in Figure 2-5, *Proposed Master Plan*, vegetation within the proposed on-site development footprint would be removed as various site improvements are undertaken over time. Landscape enhancements would include additional native plants found in the Southern California region, as well as non-native plant material consisting of the lawn play areas and proposed fruit trees (avocado and citrus orchards). Existing vegetation outside of the planned development footprint would remain in its current state, as no development would occur.

Ongoing park operations would also be subject to City requirements for weed and trash abatement (Municipal Code Chapter 11, Article 2, Division 2, Weed and Rubbish Abatement). Such regulations require the removal of dry grass, stubble, brush, or other flammable material that may endanger public safety by creating a fire hazard and/or discarded material that may be combustible or hazardous to public health, safety, or welfare, or that may hamper or interfere with fire prevention or suppression.

With conformance to applicable plans and regulations, the Project would not exacerbate wildfire risks or expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
Less than Significant Impact.

Refer also to Response 3.20(b), above. No new roads or off-site improvements to existing roads are required or proposed. Water lines operated by City of Escondido, as well as power lines and City of Escondido storm drains, are currently present on-site. Other utility services (sewer) are present to the east of Escondido Creek and along Wohlford Road, and to the north serving the Humane Society); refer to Figure 2-6, *Existing Utilities*.

The Project would require the extension of, or connection to, certain utilities to serve the proposed facilities. However, such improvements are not anticipated to exacerbate fire risk due to their nature and have been considered in this Initial Study for the potential to result in temporary or ongoing impacts to the environment. Additionally, all proposed improvements would be subject to City review once specific engineering design is undertaken and would occur in conformance with the City Fire Code, as applicable.

Additionally, new access and circulation improvements would include expanded vehicular access, as well as emergency access and circulation. The Project proposes an emergency drive-through and turn-around loop off of Save A Life Way and an emergency vehicular hammerhead in the vicinity of the existing arena; refer to Figure 2-5, *Proposed Master Plan*. Such improvements would enhance public safety on-site as compared to existing conditions and aid public response in the event of wildfire or other emergencies.

The Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? **Less than Significant Impact.***

The Project includes surface grading to level various areas of the site to accommodate the proposed facilities and supporting infrastructure, along with improvements to several existing on-site drainage channels, including Escondido Creek, to enhance on-site drainage and stormwater treatment. In accordance with applicable state and local regulations, such improvements would not result in an increase in runoff quantities or rates from the site, and would therefore not increase the risk of downstream flooding. Refer also to Section 3.10, *Hydrology and Water Quality*.

On-site areas proposed for development are generally flat or gradually sloping. Existing parking areas are generally flat. As shown in Figure VII-5, *Slopes and Ridgelines*, of the City General Plan Resource Conservation Element, areas of steeper slopes and hillsides are present in the western and southern portions of the property, some of which exceed a 25 percent slope (City of Escondido 2012a). Figure 4.6-4, *Landslide Hazard Areas*, of the General Plan EIR also shows that areas susceptible to the potential for landslide occurrence are located along portions of these slopes (City of Escondido 2012b).

The site currently supports equestrian and other recreational uses, which would be enhanced or expanded upon with the proposed Project. The majority of the proposed improvements would occur on the flatter areas of the site with limited improvements occurring where slopes may be present (e.g., new amphitheater seating, shade structure/concessions stand). All grading required to accommodate the proposed improvements would occur in accordance with City Grading Ordinance and CBC requirements as well as General Plan Community Protection Element soils and seismicity policies aimed at maintaining public safety and minimizing geologic hazards through site design. Further, due to the nature of the use, the Project does not propose permanent occupancy of the site (i.e., residential use) with the exception of the caretaker's apartment, and would therefore not increase exposure of people or structures to potential secondary effects of wildfire in this regard. Under such conditions, the Project is not anticipated to result in an increased risk of exposure to downslope landslides as the result of post-fire slope instability.

With conformance to adopted plans and regulations intended to maintain public safety, the Project would not expose people to flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3.21 Mandatory Findings of Significance

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

DISCUSSION OF IMPACTS

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

The analysis provided herein determined that the Project has the potential to directly or indirectly impact sensitive habitat and species, including nesting birds. Mitigation requiring preconstruction biological surveys; construction worker education; and compensatory mitigation for the loss of habitat would be implemented to ensure potential impacts are reduced to less than significant. Refer to mitigation measures **BIO-1 to BIO-11** in Section 3.4, *Biological Resources*. Additionally, mitigation measures **CUL-1 to CUL-3** would be implemented to ensure that Project impacts to unknown cultural and/or tribal cultural resources, including human remains, are reduced to less than significant; refer to Section 3.5, *Cultural Resources*, and Section 3.18, *Tribal Cultural Resources*.

Mitigation Measures:

Implement mitigation measures **BIO-1 to BIO-11** and **CUL-1 to CUL-3**.

Level of Significance after Mitigation: Less than significant.

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

A cumulative impact could occur if the Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct significant impacts were identified for the proposed Project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the Project may result in a contribution to a potentially significant cumulative impact.

The Project does not include any agricultural resources that could be impacted, and the Project would have no effect on population and housing or mineral resources. In addition, impacts would be less than significant for aesthetics, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, transportation, utilities and service systems, and wildfire. As a result, a cumulative impact related to these resources would not occur.

Biological resources, cultural resources, geology and soils (paleontology), and tribal cultural resources impacts that are generated by Project construction activities are potentially significant, but would be short-term and limited by a temporary construction period. Mitigation measures are proposed to reduce Project impacts to less than significant. As a result of the evaluation provided herein, there is no substantial evidence that, after mitigation, there are cumulative effects associated with the proposed Project. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

- c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? **Less than Significant Impact.***

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in the following sections: aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; noise; population and housing; and transportation. As a result of the evaluation provided herein, no potentially significant effects to human beings were identified. A less than significant impact would occur.

Mitigation Measures: No mitigation is required.

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