

Cleveland Residential Subdivision

Mitigated Negative Declaration

TPM Permit No: PL25-0030

Prepared for:

City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025
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April 2026

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ACRONYMS AND ABBREVIATIONS

ADT	average daily traffic
AERSCREEN	EPA Air Quality Dispersion Modeling
AMI	Area Median Income
AMSL	Above mean sea level
APN	Assessor Parcel Number
BACT	best available control technology
BMP	Best Management Practice
CALFIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CARB	California Air Resources Board
CBB	Crotch's bumble bee (<i>Bombus crotchii</i>)
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFD	City of Escondido Community Facilities District
CHRIS	California Historical Resources Information System
CMU	concrete masonry unit
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CWMP	Construction Waste Management Plan
dBA	A-weighted decibel
DBH	diameter at breast height
DDT	dichlorodiphenyltrichloroethane
DLRP	California Department of Conservation Division of Land Resource Protection
DMA	drainage management area
DOT	U.S. Department of Transportation
EFD	Escondido Fire Department
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EUHSD	Escondido Union High School District
EUSD	Escondido Unified School District
FAHJ	Fire Authority Having Jurisdiction
FEMA	Federal Emergency Management Agency

FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FMZ	fuel modification zones
FPA	Forest Practices Act
FPP	Fire Protection Plan
FTA	U. S. Department of Transportation Federal Transit Administration
GHG	Greenhouse Gas
HARRF	Hale Avenue Resource Recovery Facility
HOA	Home Owners Association
HSA	Hydrologic sub-area
HVAC	heating/ventilating/air conditioning
ITP	Incidental Take Permit
LEQ	equivalent continuous sound level
LMA	Local Mobility Analysis
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act of 1918
MGD	million gallons per day
MHCP	Multiple Habitat Conservation Program
MLD	Native American Most Likely Descendant
MND	Mitigated Negative Declaration
MWD	Municipal Water District
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
PDP	Priority Development Project
POC	Point of Compliance
PPV	Peak Particle Velocity
PRC	Public Resources Code
RAQS	Regional Air Quality Strategy
REL	Reference Exposure Level
RMS	Root Mean Square
ROG	Reactive Organic Gases
RTCIP	Regional Transportation Congestion Improvement Program
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District

SDCCFC	San Diego County Consolidated Fire Code
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SDNHM	San Diego Natural History Museum
SIP	State Implementation Plan
SRA	State Responsibility Area
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCA	Tribal Customary Adoption
TIAG	Transportation Impact Analysis Guidelines
TPM	Transportation Permits Manual
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Coast Guard
UWMP	Urban Water Management Plan
VMT	Vehicle miles traveled
VOC	Volatile Organic Compounds
WES	Wildfire Evacuation Study

1 Introduction

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

The IS/MND includes the following components:

- A Draft MND and the formal findings made by the City of Escondido (City) that the project would not result in any significant effects on the environment, as identified in the CEQA Initial Study Checklist (IS Checklist).
- A detailed project description.
- The CEQA IS Checklist, which evaluates the potential for significant environmental impacts from the project, is adapted from Appendix G of the CEQA Guidelines. The project is evaluated in 19 environmental issue categories to determine whether the project's environmental impacts would be significant in any category. Brief discussions are provided that further substantiate the project's anticipated environmental impacts in each category.

Because the project fits into the definition of a "project" under Public Resources Code Section 21065 requiring discretionary approvals by the City, and because it could result in a significant effect on the environment, the project is subject to CEQA review.

The IS Checklist was prepared to determine the appropriate environmental document to satisfy CEQA requirements: an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND). The analysis in this IS Checklist supports the conclusion that the project would not result in significant environmental impacts. This IS/MND will be circulated for 30 days for public and agency review, during which time individuals and agencies may submit comments on the adequacy of the environmental review. Following the public review period, the City Council will consider any comments received on the IS/MND when deciding whether to adopt the IS/MND.

2 Draft Mitigated Negative Declaration

Project Name: Cleveland Residential Subdivision (Tentative Map PL25-0030)

Project Location: The 10.38-acre project site is located at the northeast corner of Cleveland Avenue and Conway Drive in the City of Escondido in North San Diego County. The Assessor Parcel Numbers (APN) is 224-151-51-00). The project site is bounded by Cleveland Avenue on the south, Conway Drive on the west, and existing estate residential to the north and east.

Project Description: The project applicant is requesting approval of a Tentative Map to subdivide a 10.38- acre site into 29 residential lots (Lots 1 through 29), two water quality lots (Lot A and Lot B), a utility lot (Lot C) and a public street lot (Lot D). The residential lots would range in size from 5,760 square feet (s.f.) to 19,089 s.f. with an average residential lot size of 11,425 s.f. Under the maximum permitted density, the project would be allowed to construct up to 21 units. A density bonus is requested to allow for a total of 29 units. Three of the units would be affordable for very-low income households and the remaining 26 units would be market rate.

Access to the project site would be from "Street A," which would have access from Cleveland Avenue and Conway Drive. The project would include a single phase of construction. Grading and earthwork activity would be required to prepare the site for development. Based upon information from the project applicant, the project would require import of approximately 1,480 cubic yards (CY) of materials during project grading. The project may also require blasting and use of a temporary rock crusher due to bedrock conditions.

Findings: Pursuant to the provisions of CEQA (Public Resources Code, Section 21000 et seq.) and based on information contained in the attached IS Checklist, the City of Escondido has determined that the project would not have a significant effect on the environment.



Signature of Lead Agency Representative

04/04/2026

Date

2.1 Project Description

1. Project Title:

Cleveland Residential Subdivision (Tentative Map PL25-0030)

2. Lead Agency:

City of Escondido
201 N. Broadway
Escondido, CA 92025

3. Contact Person and Phone Number:

Robert Barry, AICP
Senior Planner
(760) 839-4537
Robert.Barry@escondido.gov

4. Project Location:

The approximate 10.38-acre project site is located at the northeast corner of Conway Drive and Cleveland Avenue in the northern portion of the City of Escondido (City). The project site is adjacent to parcels that are within the County of San Diego. The Assessor Parcel Number (APN) is 224-151-51-00. The project site is bounded by Cleveland Avenue to the south, Conway Drive to the west, and there are existing residential uses surrounding the project site (**Figures 1, 2 and 3**).

5. Project Applicant/Sponsor:

TTLSC SCA-Escondido, LLC (The True Life Companies)
4350 Von Karman Avenue, Suite 200
Newport Beach, CA 92660

6. General Plan Designation:

E2 (Estate II)

7. Zoning:

RE-20 (Residential Estates)

8. Description of Project:

The project applicant is requesting approval of a Tentative Map to subdivide a 10.38-acre site into 29 residential lots (Lots 1 through 29), two water quality lots (Lot A and Lot B), a utility lot (Lot C) and a public street lot (Lot D). The residential lots would range in size from 5,761 square feet (s.f.) to 19,090 s.f. with an average residential lot size of 11,425 s.f. (**Figure 4**).

Density Bonus

Under the maximum permitted density, the project would be allowed to construct up to 21 units. A density bonus is requested to allow for a total of 29 units. Three of the units would be affordable for very-low income households and the remaining 26 units would be market rate.

Very-low income is defined by the U.S. Department of Housing and Urban Development as 50% of the Area Median Income (AMI)¹.

Architectural Design

A single-family residence would be constructed on each of the residential lots. Homes would range from 1,623 s.f. to 3,689 s.f. and would be a mix of one and two stories. There would be four floor plans and the architectural styles would be Spanish Colonial Revival, California Prairie and California Craftsman. A sample of the architectural styles is presented in **Figure 5**.

Landscape Concept Plan and Fencing

The proposed landscape plan includes a mix of trees, shrubs, and groundcover and the plant selection emphasizes low water use species. The landscape concept plan is included in **Appendix A.2**. Proposed tree species include chitalpa, western redbud, jacaranda, crape myrtle, magnolia, sweet bay and Marina strawberry tree. Landscaping would cover 53,573 s.f. of the project site (11.8%) and the landscape plan complies with the Escondido Water Efficient Landscape regulations. The Home Owners Association (HOA) would be responsible for the maintenance of the landscaping in the common area.

The fencing plan for the project includes the use of 6-foot split-face block wall with cap and pilasters for the majority of the project perimeter, 6-foot black tubular steel fencing around the water quality lots, 6-foot vinyl fencing for the side yards, and 6-foot metal return fencing adjacent to the structures.

Fuel Modification Zones

The project incorporates fuel modification and includes Zone 0, Zone 1, and Zone 2, as described in the Fire Protection Plan (Dudek 2025a, **Appendix M**). The fuel modification zones (FMZs) are described below:

As part of the FPP, modeling and analysis was conducted to determine the appropriate size of fuel modification zones (FMZs). FMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other. The defensible space/fuel modification zones surrounding the structures would be consistent with Escondido Fire Department's Defensible Space Property Review Checklist and consist of up to 50 feet of irrigated, well-maintained landscape with fire-resistant plants (Fuel Modification Zone 1) and up to 50 feet of 50% thinning of dead and diseased vegetation within (Fuel Modification Zone 2.) General description of the FMZs are included below. More details are provided in the FPP (**Appendix M**).

- **Zone 0 Immediate Zone (0 feet to 5 feet)** - This is the area located from the exterior wall surface of the building extending 5 feet on a horizontal plane to Zone 1. This zone shall be constructed of continuous hardscape or limited fire-resistant plantings acceptable to the Fire Authority Having Jurisdiction (FAHJ). Vegetation in this zone shall not exceed 6-inches in height and irrigation is required. Removal of combustible materials surrounding

¹ Area Median Income (AMI) is the midpoint of a region's income distribution – half of the families in a region earn more than the median and half earn less than the median. This can also be looked at as the median household income

the exterior wall area and maintaining area free of combustible materials. The use of mulch and other combustible materials shall be prohibited.

- **Zone 1 Intermediate Zone (5 feet to 50 feet)** – This zone is located from the immediate edge of Zone 0 extending out in a horizontal plane up to 50 feet. The zone shall consist of planting low growth, drought tolerant and fire resistive plant species. The height of the plants in this zone starts as 6-inches adjacent to Zone 0 and extending in a linear fashion up to a maximum of 18-inches at intersection with Zone 2. Vegetation in this zone shall be irrigated and not exceed 10 feet in height and shall be moderate in nature. Trees shall not exceed 30 feet in height and be limited or as approved by the FAHJ. Firewood inside this zone shall be piled a minimum of 30 feet away from all buildings and structures. Cords of firewood shall also be maintained at least 10 feet from property lines and not stacked under tree canopies drip lines. This Zone is a fully irrigated zone with a maintained landscape with trees, shrubs and other plantings that shall be fire resistive, and shall be spaced according to Figure 5 of the FPP (Dudek 2025a). Any dead or dying material shall be removed from this zone.
- **Zone 2 Extended zone (50 feet to 100 feet)** – This zone is located from the immediate edge of Zone 1 extending out in a horizontal plane for 50 feet for a total of 100 feet of fuel modification. This zone consists of planting of drought tolerant and fire resistive plant species of moderate height. Brush and plants shall be limbed up off the ground, so the lowest branches are 1/3 height of bush/tree/plant or up to 6 feet off the ground on mature trees. This area would be considered selective clearing of natural vegetation and dense chaparral by removing a minimum 50% of the square footage of this area. Weeds and annual grasses are to be mowed to a height of 4–6 inches. Any chipping that is done on-site should be spread not to exceed 6 inches in depth. Trees may remain in the Zone 3 area provided that the horizontal distance between crowns of adjacent trees or tree groupings and crowns of trees and structures is not less than 10 feet.

The HOA would be responsible for ensuring long-term funding and ongoing compliance with fuel modification and maintenance requirements throughout the project site's common areas. Private property owners would be responsible for maintenance within individual lots. All fuel modification area vegetation management would be completed annually no later than June 1st of each year and more often as needed for fire safety, as determined by the Escondido Fire Department.

Project Access

Vehicular access to the project site would be via a public street that would provide access via Cleveland Avenue and Conway Drive (Street "A"). Street "A" would intersect with Street "B," a cul-de-sac. Street "A" and Street "B" would be 36-feet in width. The project also provides sidewalks on both sides of Street "A" and Street "B" to facilitate pedestrian movement. These sidewalks would connect to the future sidewalks that are proposed along the project frontage with Cleveland Avenue and Conway Drive.

Utility Improvements

Water and sewer service to the project site would be provided by the City of Escondido. The project would connect to an existing public 8-inch water main at the intersection of Cleveland Avenue and Conway Drive. The project would install a new 8-inch water line from the project entrance on Cleveland Avenue to the existing water main at Cleveland Avenue and Conway Drive. The project would connect to the existing 8-inch sewer line at Conway Drive.

The project applicant would be required to pay development fees included in the City of Escondido Fee Guide for Development Projects, in effect at the time of building permit issuance, including fees for water connection, wastewater connection, drainage facilities, San Diego County Water Authority capacity charge, and green building fees.

Stormwater Management

The project proposes the construction of two biofiltration basins (BMP-A and BMP-B), and a tree well system (BMP-C). Biofiltration basin BMP-A would be located near the southwest corner of the project and biofiltration basin BMP-B would be located in the southeast corner of the project site. BMP-C would consist of tree wells serving the central portion of the site.

Grading

The project would include a single phase of construction. Grading and earthwork activity would be required to prepare the site for development. Proposed grading includes approximately 18,160 CY of cut and 21,930 CY of fill for an import of 1,480 CY of materials.

Construction Schedule

All phases (i.e., grading and construction) of the proposed project are anticipated to start in 2026 and completed in 2027.

Project Design Features

The project includes design features which would reduce potential impacts, and the project would adhere to applicable regulatory requirements, as identified in **Table 1**.

Table 1. Project Design Features

Environmental Topic	Design Feature
Aesthetics	Implementation of the landscape plan
Air Quality	<p>The project shall comply with SDAPCD Rule 55 (Fugitive Dust), which outlines specific standards for fugitive dust on construction sites, including maintaining stabilization of disturbed areas, controlling track-out, and preventing visible dust emission from exceeding opacity standards.</p> <ul style="list-style-type: none"> ● The project shall comply with SDAPCD Rule 51 (Nuisance), which prohibits the discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to others. ● Heavy diesel construction equipment shall be rated Tier 4 or better.
Hazards (Wildfire Risk)	<p>The project design includes the following features to enhance fire safety and minimize hazards related to wildfire:</p> <ul style="list-style-type: none"> ● Compliance with requirements for site access, road standards, driveway requirements, premise identification, and fire hydrants, as described in Section 2 of the FPP (Dudek 2025a). ● Implementation of Zone 0, Zone 1, and Zone 2 FMZs and landscaping requirements, as described in Section 2.15 of the FPP (Dudek 2025a).

Environmental Topic	Design Feature
	<ul style="list-style-type: none"> ● Implementation of additional structure protection measures (e.g., ignition-resistive materials, fully sprinklered, ember-resistant venting) as described in Section 2.13 of the FPP (Dudek 2025a). ● Project construction materials shall meet or exceed the code requirements for fire- resistive construction. ● Annual inspections of homeowners and HOA compliance by a qualified Escondido Fire Department approved 3rd party inspector to verify fuel management and compliance with the requirements of the FPP (Dudek 2025a).
Hydrology and Water Quality	<p>The project design includes two biofiltration basins (BMP-A and BMP-B) and a tree well system (BMP-C). Additionally, the project would implement the following source control and site design BMPs:</p> <p>Source Control BMPs:</p> <ul style="list-style-type: none"> ● SC-1: Prevention of Illicit Discharges into the MS4 ● SC-2: Storm Drain Stenciling or Signage ● SC-6: Additional BMPs based on potential sources of run-off pollutants including on-site storm drain inlets, landscape/outdoor pesticide use, miscellaneous drain or wash water, and plazas, sidewalks, and parking lots. <p>Site Design BMPs:</p> <ul style="list-style-type: none"> ● SD-1: Maintain Natural Drainage Pathways and Hydrologic Features ● SD-3: Minimize Impervious Area (Install parking and driving aisles to minimum width requirements to meet standards) ● SD-4: Minimize Soil Compaction (Avoid compaction in planned landscape spaces. Till and amend soil for improved infiltration capacity. ● SD-6: Run-off Collection ● SD-7: Landscaping with Native or Drought Tolerant Species <p>Construction -Phase Storm Water Pollution Prevention Plan (SWPPP) BMPs:</p> <p>Prior to and during grading and construction, the project would implement temporary construction BMPs, including but not limited to:</p> <ul style="list-style-type: none"> ● Good site management/housekeeping ● Erosion control ● Sedimentation control ● Run-on and run-off control ● Non-stormwater management ● Spill prevention and response (oil, lubricants, and chemicals) ● Inspection, maintenance and repair ● Rain event action planning and monitoring/reporting

Environmental Topic	Design Feature
Noise	<ul style="list-style-type: none"> ● Comply with the General Plan Community Protection Element related to noise goals and policies, specifically a Community Noise Equivalent Level (CNEL) of 60 dBA or less for single-family residential. ● Comply with Section 17.234 and 17.240 of the Escondido Municipal Code that limits operation of construction equipment to between 7:00 AM and 6:00 PM Monday through Friday and on Saturday from 9:00 AM to 5:00 PM. Construction equipment cannot be operated on Sundays or holidays, without a variance from the City Manager. ● Comply with the following standard best management practices during construction: <ul style="list-style-type: none"> ○ Staging areas should be placed as far as possible from sensitive receptors. ○ Place stationary equipment in locations that would have a lesser noise impact on nearby sensitive receptors. ○ Turn off equipment when not in use. ○ Limit the use of enunciators or public address systems, except for emergency notifications. ○ Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured to prevent rattling and banging. ○ Schedule work to avoid simultaneous construction activities that both generate high noise levels. ○ Use equipment with effective mufflers. ○ Minimize the use of backup alarms.
Public Services	<ul style="list-style-type: none"> ● The project applicant would be required to pay applicable school fees pursuant to California Education Code Section 17620 et seq. and Governments Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. ● The project applicant would be required to pay development fees included in the City of Escondido Fee Guide for Development Projects, in effect at the time of building permit issuance, including public facility fee (police, fire, library, etc.), park fee, citywide facilities fee, and fire department inspection fee.
Recreation	<p>The project applicant shall be required to pay development fees included in the City of Escondido Fee Guide for Development Projects, in effect at the time of building permit issuance, including park fees.</p>
Transportation	<ul style="list-style-type: none"> ● Construction of sidewalks along future Street “A” and Street “B” and along the project frontage with Cleveland Avenue and Conway Drive. ● The project applicant would be required to pay development fees included in the City of Escondido Fee Guide for Development

Environmental Topic	Design Feature
	Projects, in effect at the time of building permit issuance, including local and regional traffic fees.
Utilities and Service Systems - Water and Wastewater	<ul style="list-style-type: none"> • The project applicant would be required to pay development fees included in the City of Escondido Fee Guide for Development Projects, in effect at the time of building permit issuance, including fees for water connection, wastewater connection, drainage facilities, SDCWA capacity charge, green building fees, and State energy regulation inspection surcharge. • The project applicant shall develop a Construction Waste Management Plan and divert a minimum of 65% non-hazardous construction debris in compliance with the California Green Building Standards Code. Per City of Escondido requirements, the project applicant must submit Part 1 of the Construction Waste Management Plan for approval to the City prior to issuance of building permit.

9. Surrounding Land Uses and Project Setting:

Currently, the project site is undeveloped. The site is surrounded by single-family residential uses in a variety of densities. It is bounded on the west by Conway Drive and to the south by Cleveland Avenue. To the east are residences within the County of San Diego.

10. Other Public Agencies Whose Approval is Required:

None.

11. Have California Native American tribes traditionally or culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? The City has notified the tribes in accordance with Public Resources Code Section 21074.

In accordance with the requirements of Assembly Bill (AB) 52, the City sent notification to Native American tribes traditionally and culturally affiliated with the project area on November 10, 2025. See Section XVIII of the Initial Study Environmental Checklist for more detail on the three responses that were received from local tribal representatives. Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality so any information from the tribes is provided in general terms.

Summary of Environmental Effects Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Mitigated to Below a Level of Significance,” as indicated by the checklist on the following pages.

	Aesthetics		Land Use and Planning
	Agriculture and Forestry Resources		Mineral Resources
	Air Quality	X	Noise
X	Biological Resources		Population and Housing
X	Cultural Resources		Public Services
	Energy		Recreation
X	Geology and Soils		Transportation
	Greenhouse Gas Emissions	X	Tribal Cultural Resources
	Hazards and Hazardous Materials		Utilities and Service Systems
	Hydrology and Water Quality		Wildfire
			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 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature of Lead Agency Representative

04/04/2026

Date

Figure 1. Regional Location

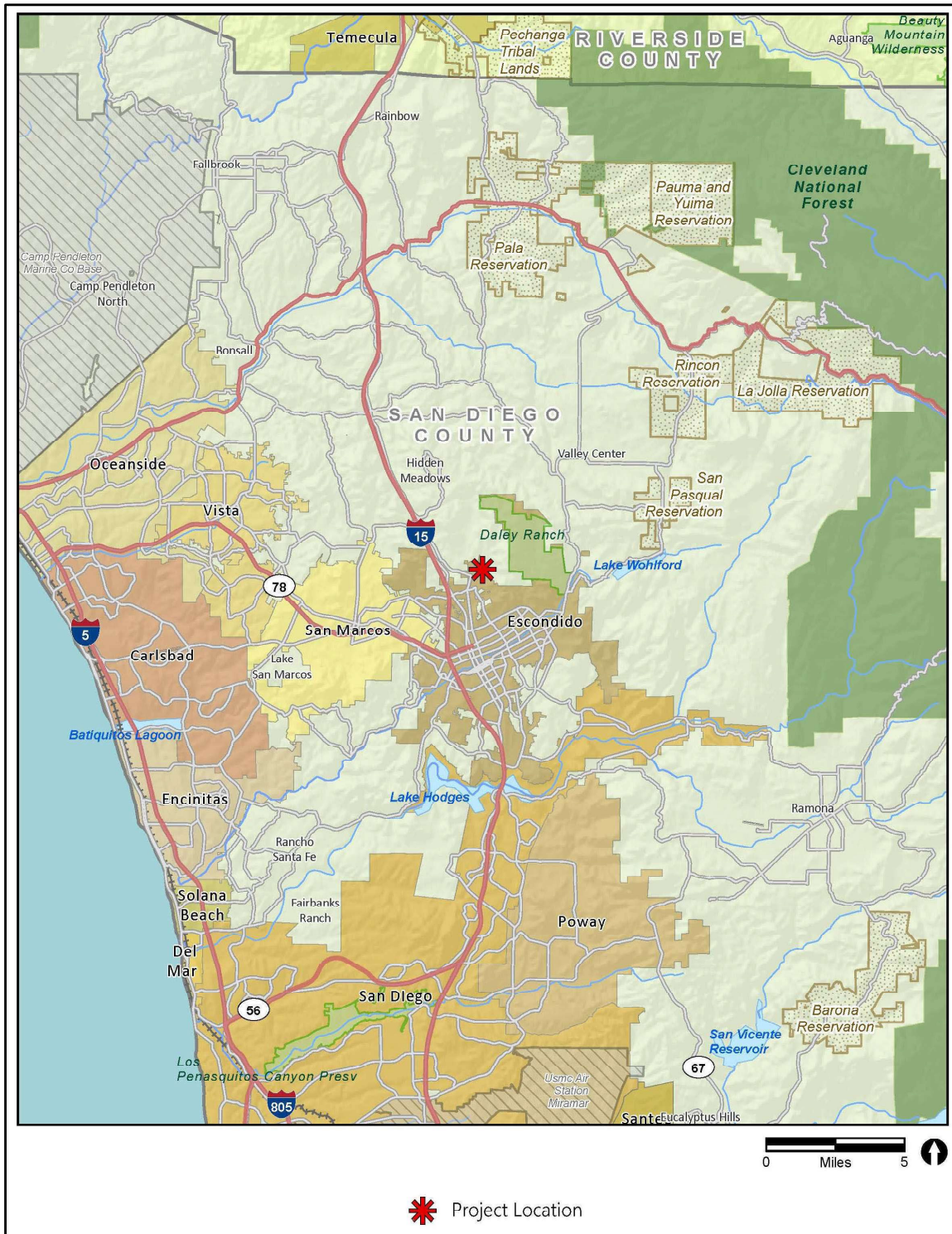


Figure 2. Project Location on USGS Map

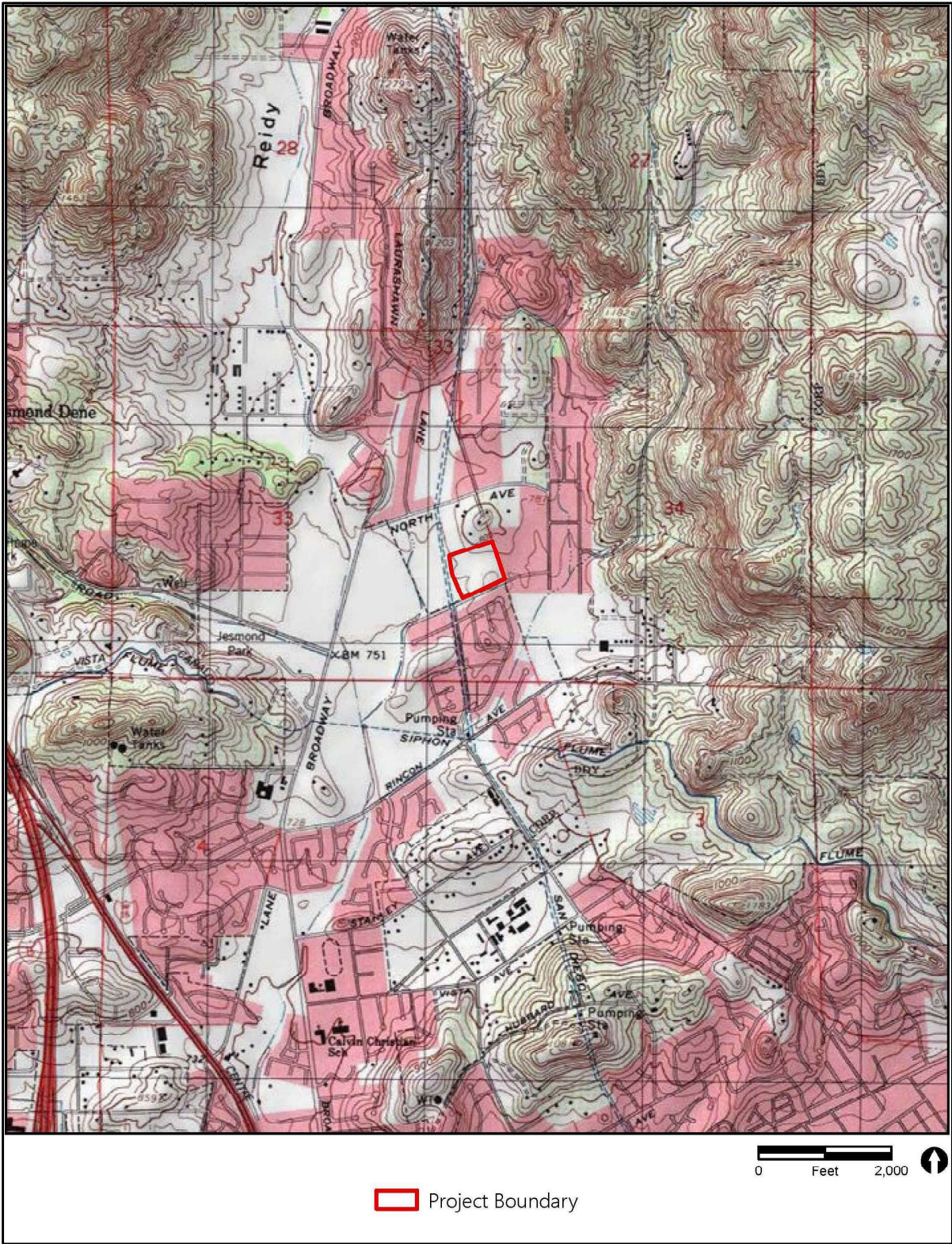


Figure 3. Project Location on Aerial Photograph



Figure 4. Site Development Plan

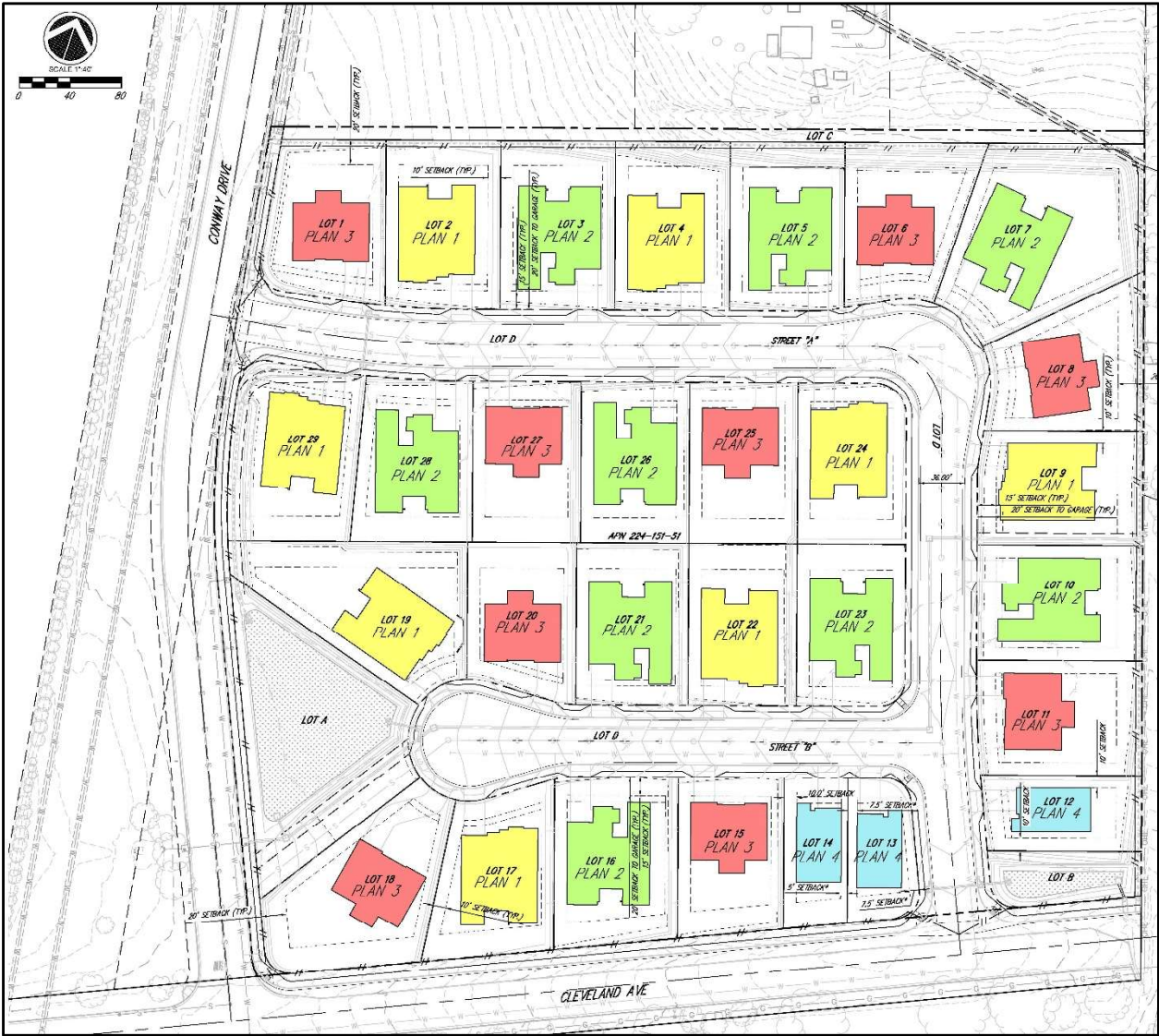


Figure 5. Architectural Styles



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Refer to landscape drawings for wall, tree, and shrub locations

"A" SPANISH COLONIAL REVIVAL



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Refer to landscape drawings for wall, tree, and shrub locations

"B" CALIFORNIA PRAIRIE



© 2023 Kevin L. Crook Architect, Inc.

Refer to landscape drawings for wall, tree, and shrub locations

"C" CALIFORNIA CRAFTSMAN

3 Initial Study Checklist

The following Initial Study Checklist provides a preliminary analysis to determine if a project may have a significant effect on the environment and aids in determining what type of environmental document to prepare.

3.1 Aesthetics

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) In 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 points). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

a) Have a substantial adverse effect on a scenic vista? Less than Significant Impact

A scenic vista is typically defined as a panoramic view or vista from an identified view/vista point, public road, public trails, public recreational areas, or scenic highways. The project site is not located in an area where there would be a panoramic view or vista identified view/vista point, public road, public trails, public recreational areas, or scenic highways. The project vicinity is developed, with single-family residential to the west and south within the City of Escondido and rural residential to the east in the County of San Diego. The project site sits between two intermediate ridgelines in a lower elevation portion of the City.

The density of the proposed development is similar to the single-family residential to the west and south of the project site and represents an area of transition to single-family residential and rural residential parcels in the County of San Diego located to the east of the project site. Proposed residences would range from 1,623 s.f. to 3,689 s.f. and would be a mix of one and two stories. The project's landscape plan would provide visual interest and soften the look of the development. The landscape plan is included in **Appendix A.2** Impacts would be **less than significant**.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway? No Impact

The project site is located approximately 1.6 miles east of I-15. A portion of I-15 is designated as eligible as a Scenic Highway by Caltrans; however, the segment is not in the project vicinity (Caltrans 2019). The eligible segment is on I-15 between SR-76 and SR-91, approximately 15 miles north of the project site.

The City, in Visual Resources Policy 3.6 included in the Escondido General Plan Resource Conservation Element, established policy language for development within the I-15 scenic corridor. Policy 3.6 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 that include: outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings. The I-15 scenic corridor is defined as the area within 1,750 feet of the freeway. The project site is more than 1,750 feet from the freeway. Therefore, the project would not conflict with Policy 3.6, nor would it result in substantial damage to scenic resources within a State Scenic Highway. **No impact** is identified.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (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 the applicable zoning and other regulations governing scenic quality? Less than Significant Impact

The City of Escondido (which includes the project site) is considered an urbanized area per the Public Resources Code (PRC). Per PRC section 21071, an "urbanized area" is defined as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As the total population of Escondido was estimated to be 148,847 as of July 1, 2024 (USCB 2024), the City meets this threshold. Therefore, the first question of this aesthetics threshold does not apply to the proposed project, as it is directed at non-urbanized areas.

The second part of this threshold is for projects in urbanized areas, which applies to the project. A significant impact would occur if the project conflicts with the applicable zoning and other regulations that govern scenic quality. The proposed project is designed to be consistent with the existing zoning and General Plan designations, with approval of a density bonus pursuant to State law, as follows: the project site has a General Plan designation of E2 (Estate II) and a Zoning designation of R-E-20: Estate Residential.

The City's General Plan Resource Conservation Element includes a number of policies that pertain to visual resources. Below are the policies and a discussion on the proposed project's consistency.

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

The project site does not contain any unique landforms, creeks, lakes or open space areas, therefore there is no potential for the project to impact these types of visual resources. The project is consistent with Policy 3.1.

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

The project site sits in a lower elevation portion of the City between two intermediate ridgelines. The proposed project is appropriate in scale and proposes development at a similar density as residential uses to the west and south and represents a transition area to single-family residential and rural residential to the east of the project site in the County of San Diego. The project includes a mix of architectural designs (Spanish Colonial Revival, California Prairie and California Craftsman) which would create visual interest. A landscape plan would be implemented to provide a cohesive landscape concept which would provide additional visual interest to the project site. The project is consistent with Policy 3.2.

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

The project site does not contain any significant visual resources such as existing terrain, steep slopes, floodways, habitat area or ridgelines. The proposed project is appropriate in scale and proposes development at a similar density as residential uses to the west and south and represents a transition area to single-family residential and rural residential to the east of the project site in the County of San Diego. The project is consistent with Policy 3.3.

Visual Resources Policy 3.4 - Prohibit development on skyline ridges and seek to obtain scenic easement dedications for these areas from property owners in conjunction with development on other suitable locations of the property. Require property owners of such scenic easements to retain, maintain, preserve, and protect the public view of

these areas in their natural state, without obstruction by structures, and prohibit clearing of brush or planting of vegetation except as necessary to reduce fire hazards.

As shown on City of Escondido General Plan Resource Conservation Easement, Figure VII-5, the proposed project site does not contain skyline ridges and therefore, no scenic easements would be required. Therefore, the proposed project is consistent with Policy 3.4.

In summary, since the proposed project is consistent with the existing zoning and General Plan designations and the associated visual resource policies included in the General Plan, impacts would be **less than significant**.

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

Lighting

Existing lighting in the project vicinity is associated with roadway lighting along Cleveland Avenue and Conway Drive, and lighting associated with the existing residential uses in the vicinity. The project site is undeveloped and does not have any lighting. Development of the proposed project would introduce lighting to the site. Nighttime exterior lighting would be provided on the project site for safety, security, and circulation purposes. Different exterior lighting fixtures would be used, including pole-mounted streetlights and wall-mounted residential lights.

Consistent with Article 35 of the Zoning Ordinance, all exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded so that unnecessary nighttime lighting and glare are reduced for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. Additionally, in accordance with Zoning Ordinance section 33-713, street lighting installed on the proposed streets would comply with the City's Engineering Design Standards and Standard Drawings. Lighting impacts would be **less than significant**.

Glare

Glare typically occurs from reflective building materials and finishes, as well as reflective lighting structures and metallic surfaces. There are no existing sources of glare on the project site. Proposed architectural styles include Spanish Colonial Revival, California Prairie and California Craftsman and would not use any materials or finishes that would be glare-inducing. Reflective materials are not proposed. Therefore, the project does not propose any features that would be characterized as creating a substantial new source of glare that would adversely affect daytime or nighttime views in the area. Impacts would be **less than significant**.

3.2 Agriculture and Forestry Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

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

The Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance.

The FMMP categories are as follows:

- **Prime Farmland** has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance** is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some point during the four years prior to the mapping date.
- **Unique Farmland** consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyard as found in some climactic zones in California. Land must have been cropped at some point during the four years prior to the mapping date.
- **Farmland of Local Importance** is land that meets all the characteristics of Prime Farmland and Statewide Farmland, with the exception of irrigation. They are farmlands not covered by the above categories but are of significant economic importance to the County. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce and cauliflower) and soils suited for orchard crops (avocado and citrus).
- **Grazing Land** is land on which the existing vegetation is suited for the grazing of livestock.

In addition, the FMMP identifies non-agricultural lands as either Urban and Built-Up Land or Other Land.

- **Urban and Built-Up Land** is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land** is not included in any other 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 forty acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

The project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) by the FMMP. The site is mapped as "Urban and Built-Up Land" and is

surrounded by “Urban and Built-Up” land (CDCLRP 2022). Therefore, the project would not result in the conversion of Prime, Unique or Farmland of Statewide Importance and **no impact** is identified.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? No Impact

The project site is not located within a Williamson Act contract area (CDCDLRP 2025). The project site has a General Plan designation of Residential Estate II and a zoning designation of Residential Estate (R-E). Lands in the project vicinity are also zoned for and developed with residential uses. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. **No impact** is identified.

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

The project site has a General Plan designation of Residential Estate II and a zoning designation of Residential Estate (R-E). Lands in the project vicinity are also zoned for and developed with residential uses. Therefore, the proposed project is not located in an area that is zoned for forest land, timberland or for timber production. **No impact** is identified.

d) Result in the loss of forest land or conversion of forest land to non-forest use? No Impact

The project site does not support forests, nor is there any forest land adjacent to the project site. The project site supports non-native grassland and is adjacent to residential uses. Therefore, the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. **No impact** is identified for this issue area.

e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? No Impact

There are no aspects of the proposed project that would involve other changes in the existing environment that, due to its location or nature, could result in a conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The project site is adjacent to existing residential uses of varying densities. There are no properties designated as Prime Farmland or forest uses adjacent to the project site. Therefore, the proposed project would not directly or indirectly impact or convert any existing Farmland or forestland. **No impact** would occur.

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.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

The City of Escondido has established thresholds in Section 33-924 of Article 47 in Chapter 33 of the Municipal Code to address and implement CEQA Guidelines that should be used for the preparation of Air Quality Impact Assessments. The Municipal Code provides screening criteria that can be used to demonstrate that a project's total emissions would not result in a significant impact as defined by CEQA. Should emissions be found to exceed these thresholds, additional modeling is required to demonstrate that the project's total air quality impacts are below the state and federal ambient air quality standards. The screening thresholds for construction and daily operations are shown in pounds (lbs) per day in **Table 2**.

Table 2. Screening-Level Thresholds for Criteria Pollutants

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

Source: LDN 2025a.

SDAPCD Rule 1200- New Source Review

Non-Criteria pollutants such as Hazardous Air Pollutants (HAPs) or Toxic Air Contaminants (TACs) are also regulated by the San Diego Air Pollution Control District (SDAPCD). Rule 1200 (Toxic Air Contaminants - New Source Review) adopted on June 12, 1996, requires evaluation of potential health risks for any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminants. The rule requires that projects that propose to increase cancer risk between 1 and 10 in one million need to implement toxics best available control technology (T-BACT) or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall the project increase the cancer risk to over 10 in one million. Projects creating cancer risks less than one in one million are not required to implement T-BACT technology. Volatile Organic Compounds (VOC) and Reactive Organic Gases (ROG) are assumed to be essentially the same due to the fact that emissions generated from the project represent non-methane organic compounds.

SDAPCD Rule 55 – Fugitive Dust

Rule 55 regulates short-term air pollutant emissions associated with suspended particulate matter, also known as fugitive dust. Compliance with Rule 55 includes:

- **Airborne Dust Beyond the Property Line:** No person shall engage in construction or demolition activity subject to this rule in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60- minute period.
- **Track-Out/Carry-Out:** Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall:

- Be minimized by the use of any of the following or equally effective track-out/carry-out and erosion control measures that apply to the proposed project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; and for outbound transport trucks: using secured tarps or cargo covering, watering, or treating of transported material; and
- Be removed at the conclusion of each workday when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any track- out/carry-out, only PM10- efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/ carry-out is prohibited under any circumstances.

SDAPCD Rule 51 – Nuisance

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

Air quality modeling was conducted for the project by LDN Consulting (LDN) (2025a) and is included in **Appendix B** of this document.

a) Conflict with or obstruct implementation of the applicable air quality plan? Less than Significant Impact

The proposed project is related to the Regional Air Quality Strategy (RAQS) and/or State Implementation Plan (SIP) through the land use and growth assumptions that are incorporated into the air quality planning process. Both air quality plans contain strategies for the region to attain and maintain the ambient air quality standards. Projects that are consistent with existing General Plan documents and subsequent San Diego Association of Governments (SANDAG) population projections, which are used to develop air emissions budgets for air quality planning and attainment demonstrations, would be consistent with the San Diego Air Basin's (SDAB) air quality plans, including the RAQS and SIP. Provided a project proposes the same or less development as accounted for in the General Plan document, and provided the project is in compliance with applicable rules and regulations adopted by SDAPCD through their air quality planning process, the project would not conflict with or obstruct implementation of the RAQS or SIP. The project site has a General Plan designation of Residential Estate II and a zoning designation of Residential Estate (R-E). The proposed project, along with the proposed density bonus pursuant to State law, is consistent with the General Plan land use designation and density, and therefore, also consistent with the RAQS.

Another test of consistency is whether the proposed project exceeds SDAPCD daily emissions thresholds. As detailed below, in sections b), c), and d) below, emissions generated by the proposed project would be below emissions thresholds established by the SDAPCD. Therefore, the proposed

project would be consistent with and would not conflict with or obstruct implementation of the RAQS. Impacts would be less than significant.

- 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? Less Than Significant Impact**

Criteria Pollutant Analysis

Table 3 shows the state and federal attainment status for criteria pollutants in the SDAB. As shown, the SDAB is a nonattainment area for the state and federal ozone (O₃) standards and for the state PM₁₀ and PM_{2.5} standards.

The SDAPCD establishes screening-level criteria for air quality emissions through Rule 20.2. The City of Escondido relies on the SDAPCD and section 33-924(a)(5) of the Escondido Municipal Code for establishing screening-level thresholds for criteria air pollutants. The screening-level thresholds are shown in **Table 2**. These criteria can be used as numeric indicators that demonstrate whether a project's emissions would result in a significant impact to air quality. Any project with daily construction- or operation-related emissions that exceed any of the following screening-level thresholds would be considered to have a significant air quality impact and modeling would be required to demonstrate that the project's total air quality impacts result in ground-level concentrations that are below State and Federal Ambient Air Quality Standards, including appropriate background levels. For nonattainment pollutants (O₃, with ozone precursors NO_x and VOCs, and PM₁₀), if emissions exceed the thresholds shown in **Table 2**, the project could have the potential to result in a cumulatively considerable net increase in these pollutants.

Table 3. Attainment Status of Criteria Pollutants in San Diego Air Basin

Pollutant	Federal	State
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Attainment ⁽¹⁾	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Particulate Matter 10 microns (PM ₁₀)	Unclassified ⁽²⁾	Nonattainment
Particulate Matter 2.5 microns (PM _{2.5})	Attainment	Nonattainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

Source: SDAPCD 2024.

Notes:

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

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

Construction Emissions

Construction activities for the project would include grading and site preparation, paving, building construction, and architectural coating applications. Construction modeling assumes a single phase of construction. Grading includes approximately 18,169 cy of cut and 21,930 cy of fill with an import of 1,480 cy. Due to bedrock conditions, blasting and rock crushing may be required. The rock crusher assumed to be used during blasting would be similar to the Terex 4242SR 310 HP unit. Additionally, the project's construction team would utilize Tier 4 diesel construction equipment. This requirement has been listed as a project design feature in **Table 1** and would be required as a condition of project approval.

The California Air Resources Board (CARB) regulations require that – starting in 2012 – all off-road equipment produced needs to meet the basic requirements for Tier 4 compliance (Tier 4 Interim) (CARB 2023). Off-road equipment fleets are managed by CARB and are typically based on total horsepower owned. Owners are limited to what types of equipment they must maintain as their fleet can include equipment from rental companies. Most equipment operators maintain fleets consisting of mostly Tier 4 equipment already.

Table 4 presents the anticipated construction emissions for the project, incorporating the identified project design feature. As shown in **Table 4**, maximum daily emissions would be below the screening-level thresholds for all criteria pollutants. Additionally, the project is located in an area that is mostly built out, meaning it is unlikely that construction of another project in the vicinity would coincide with construction of the proposed project. In addition, as shown in **Table 4**, the project emissions would be approximately 78 to nearly 100 percent lower than the City's screening-level thresholds. So, even if an identical project were constructed adjacent to the proposed project, cumulative construction impacts would not be likely. Therefore, construction emissions impacts would be **less than significant**.

Table 4. Construction Emissions (lbs/day)

Year	VOC	NOx	CO	SO ₂	PM ₁₀ (Dust)	PM ₁₀ (Exhaust)	PM ₁₀ (Total)	PM _{2.5} (Dust)	PM _{2.5} (Exhaust)	PM _{2.5} (Total)
2026	16.4	3.5	33.3	0.05	0.11	19.8	19.9	0.11	10.1	10.2
Blasting Emissions		102	402		20.59		20.59			
2026 Total	16.4	105.5	435.3	0.05	20.7	19.8	40.49	0.11	10.1	10.2
2027 Total	0.21	1.98	11.1	0.01	0.03	0.13	0.15	0.03	0.03	0.06
Screening Level Threshold (lbs/day)	75	250	550	250	-	-	100	-	-	55
Percent lower than screening threshold (%)	78%	58%	21%	100%			60%			81%
Exceeds Screening Threshold?	No	No	No	No	No	No	No	No	No	No

Source: LDN 2025a.

Operational Emissions

Operational impacts associated with the project would include mobile sources, area sources, and energy use. Area sources include consumer products, landscaping, and architectural coatings applied during routine maintenance. **Table 5** provides a summary of the estimated operational emissions for the proposed project for summer and winter scenarios. As shown in **Table 5**, operational emissions associated with the project would be below the significance thresholds for all criteria pollutants. Impacts would be **less than significant**.

Table 5. Operations Emissions (lbs/day)

	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Summer Scenario						
Mobile	1.09	0.78	8.33	0.02	1.86	0.48
Area	1.45	0.02	1.65	< 0.005	< 0.005	< 0.005
Energy	0.01	0.21	0.09	< 0.005	0.02	0.02
Total (lbs/day)	2.56	1	10.1	0.02	1.88	0.50
City of Escondido Screening Threshold	75	250	550	250	100	55
Exceed Screening Threshold?	No	No	No	No	No	No
Winter Scenario						
Mobile	1.07	0.86	7.81	0.02	1.86	0.48
Area	1.31	0	0	0	0	0
Energy	0.01	0.21	0.09	< 0.005	0.02	0.02
Total (lbs/day)	2.39	1.06	7.9	0.02	1.88	0.50
City of Escondido Screening Threshold	75	250	550	250	100	55
Exceed Screening Threshold?	No	No	No	No	No	No

Source: LDN 2025a.

Cumulative Impacts

Cumulative impacts would exist when either there are direct air quality impacts or when multiple construction projects occur within the same area simultaneously. To illustrate this, if a project were to produce air quality emissions simultaneously to a nearby construction project the addition of both project emissions to the environment could exceed significance thresholds. If an adjacent or nearby project, typically located within 1,000 feet, were under construction at the same time, the combined emissions from both projects could be cumulatively significant if the increase would cause the total emissions to exceed the thresholds. As the distance between cumulative projects increases, construction emissions disperse into the surrounding atmosphere and rapidly dilute, resulting in lower concentrations that do not alter ambient air quality levels.

As shown in **Figure 6**, there are two pending development projects in the vicinity of the proposed project. The recently approved IKSON of Escondido Krishna Temple and Residential project is located on Rincon Avenue, east of Conway Drive, approximately 1,700 feet south of the project site. The Capistrano residential development, located at the intersection of Stanley Avenue and Conway Drive, is approximately 2,800 feet south of the project site. Since these projects are over 1,000 feet from the proposed project, cumulative air quality impacts are not expected.

Summary

As identified above, the SDAB is a nonattainment area for state and federal O₃ standards and for state PM₁₀ and PM_{2.5} standards. Evaluating whether the project could result in a cumulatively considerable impact on air quality relies on both the project's consistency with the RAQS and the SIP, which address attainment of the O₃ standards, and the potential for the project to result in a cumulatively considerable impact due to particulate emissions.

As part of the RAQS and SIP planning process, the SDAPCD develops an emission inventory, based on projections from SANDAG, of growth in the region as well as on information maintained by the SDAPCD on stationary source emissions within the SDAB. The SDAPCD then uses the emission inventory to conduct airshed modeling, to demonstrate that the SDAB will attain and maintain the O₃ standards. Provided a project's emissions are consistent with the projections within the RAQS and SIP, as is the case with the proposed project, the project would not result in a cumulatively considerable impact on O₃ within the SDAB.

With regard to emissions of O₃ precursors NO_x and VOCs during construction, the SIP includes emissions associated with construction in its emissions budget and therefore within its attainment demonstration. As identified above, the O₃ precursor emissions associated with project construction are well below the screening-level thresholds. Therefore, the project would not result in additional emissions of O₃ precursors above those projected in the attainment demonstration for O₃. The project would therefore not result in a cumulatively considerable impact to O₃ levels within the SDAB. In summary, the project would not result in a cumulatively considerable net increase of O₃, PM₁₀, or PM_{2.5} standards, for which the project region is in nonattainment and impacts would be **less than significant**.

Figure 6. Cumulative Projects



c) **Expose sensitive receptors to substantial pollutant concentrations? Less Than Significant Impact**

Sensitive receptors are defined as schools, hospitals, resident care facilities, or daycare centers, as well as residential receptors in the project vicinity. Sensitive residential receptors are adjacent to the project and are associated with existing residential uses.

Toxic Air Contaminants

Cancer Risk

The threshold related to sensitive receptors addresses whether the project could expose sensitive receptors to substantial pollutant concentrations of criteria pollutants or toxic air contaminants (TACs). As identified above, if a project has the potential to result in emissions of any TAC that results in a cancer risk of greater than 10 in 1 million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact.

To address the potential for emissions of construction-related TAC emissions to result in exposure of sensitive receptors to substantial pollutant concentrations, a screening health risk assessment was conducted for construction emissions. The risk-driving toxic air contaminant that would be emitted during construction is diesel exhaust since exposure to diesel exhaust is known to cause cancer and acute and chronic health effects. Diesel exhaust emissions can be estimated using the annual PM₁₀ exhaust emissions from on-site construction operations.

Risks were calculated based on the Office of Environmental Health Hazards Assessment update guidance (OEHHA 2015). Cancer risk is calculated by multiplying the daily inhalation or oral dose, by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home, and the exposure duration divided by averaging time, to yield the excess cancer risk. Based upon the air quality modeling, and assuming Tier 4 equipment as a design feature, worst-case on-site PM₁₀ from construction exhaust would cumulatively produce 0.0063 tons over the construction duration (391 calendar days) or an average of 1.69x10⁻⁴ grams/second (LDN 2025a).

Utilizing these figures and based on the AERSCREEN dispersion model, the worst-case annual concentration of 0.0162 µg/m³ would be expected during the construction period. Therefore, the inhalation cancer risk is 3.34 per million exposed at 125 meters (410 feet) from the geometric centroid of the project. As a condition of project approval, the project would be required to utilize Tier 4 diesel equipment. Since the threshold is 10 per million exposed with T-BACT installed, the project would have a **less than significant impact** and would be in compliance with the City's thresholds (LDN 2025a).

Chronic Health Risks/ Non-Cancer Risk

There are known chronic health risks associated with diesel exhaust which are considered non-cancer risks. Non-Cancer risks or risks defined as chronic or acute are also known with respect to diesel particulate matter and are determined by the hazard index. To calculate hazard index, diesel particulate matter concentration is divided by its chronic Reference Exposure Levels (REL). Where the total equals or exceeds one, a health hazard is presumed to exist. Diesel Exhaust has a REL of 5 micrograms per cubic meter of air (µg/m³) and targets the respiratory system (LDN 2025a). The hourly concentration of 0.0176 µg/m³ divided by the REL of 5 µg/m³ yields a Health Hazard Index of 0.035, which is less than one. Therefore, based on thresholds for non-cancer risks, non-cancer health risks are also considered **less than significant**.

Additionally, the project would adhere to SDAPCD Rule 55 which regulates short-term air pollutant emissions associated with suspended particulate matter, also known as fugitive dust. As described above, compliance with Rule 55 includes minimizing airborne dust beyond the property line and following track- out/carry-out procedures.

Summary

With the required Tier 4 diesel equipment, the project's inhalation cancer risk from diesel exhaust would be well in compliance with the City's thresholds. The project's chronic/ non-cancer health risks from diesel exhaust would also be less than significant. Additionally, the project's adherence to SDAPCD Rule 55 would reduce emissions related to fugitive dust. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be **less than significant**.

d) Result in other emissions such as those leading to odors affecting a substantial number of people? Less Than Significant Impact

Odor impacts can occur during construction and operations. Potential on-site odor generators would include short-term construction odors from activities such as paving (asphalt laying) and painting and from use of heavy -duty equipment used during construction. However, the construction activity would cease to occur after individual stages of construction are completed. The proposed project is required to comply with SDAPCD Rule 51 during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Since odors caused from construction emissions are temporary and regulated by the SDAPCD, impacts would be **less than significant**.

For operations, the project proposes single-family residential uses, consistent with surrounding residential uses. These uses would not meet typical uses generating odors which CARB outlines in their Land Use Handbook (CARB 2005) which include: sewage treatment plants, landfills, recycling facilities, waste transfer stations, refineries, biomass operations, autobody shops, coating operations, fiberglass manufacturing, foundries, rendering plants and livestock operations. Since the project does not propose these types of uses or any other uses which would result in operational odors, impacts would be **less than significant**.

3.4 Biological Resources

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

A Biological Resources Letter Report was prepared for the proposed project by RECON and is included as **Appendix C** of this report (RECON 2025a). The biology report included an on-site resources assessment, biological resources mapping, vegetation mapping, and records search. RECON biologists Chelsea Poley and Katie Raffaini performed a general biological survey on April 9, 2025. A Crotch's bumble bee (CBB; *Bombus crotchii*) habitat assessment was also conducted at this time necessitated by the species' recent listing as a candidate endangered species under the California Endangered Species Act (CESA).

The biological survey area consisted of the entire project footprint with a 50-foot survey buffer, which collectively equals 13.61 acres. The survey was conducted from 10:00 a.m. to 12:55 p.m. and weather conditions ranged from 80 to 82 degrees Fahrenheit, with 0 percent cloud cover, and 0-to-1-mile-per-hour winds.

The biological survey area was visually assessed by foot, where possible, and inaccessible portions of the biological survey area were scanned using binoculars to provide complete visual coverage. Vegetation communities were mapped on high resolution aerial imagery using ArcGIS field maps. Wildlife species were observed directly or detected from calls or observations. All plant species observed during the survey were also noted.

The survey was conducted during the daytime to maximize visibility and detection of plants and most animals. Plant and animal species inventories were limited by seasonal and temporal factors, as well as noise levels from Cleveland Avenue and Conway Drive. To account for survey limitations, special-status plant and wildlife species that could occur based on species records, known ranges, and habitat preferences are analyzed herein based on their potential to occur.

A two-mile search radius was utilized for database review, which included the California Natural Diversity Database (CNDDDB; California Department of Fish and Wildlife [CDFW] 2025a) and the All Species Occurrence Database (U.S. Fish and Wildlife Service [USFWS] 2025).

Vegetation Communities

Three vegetation communities/land cover types occur on the project site: Non-native grassland, Non-native grassland: Broadleaf-dominated, and urban/developed as shown on **Figure 7**.

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Figure 7. Vegetation Communities



Source: RECON 2025a.

Non-Native Grassland

Non-native grassland consists of a dense to sparse cover of annual, non-native grasses and forbs (Holland 1986). This is the dominant vegetation community within the project site, and dominant species on-site include ripgut grass (*Bromus diandrus*), wall barley (*Hordeum murinum*), greenstem filaree (*Erodium moschatum*), and long-beak filaree (*Erodium botrys*), some of which were flowering at the time of the survey. On-site, this vegetation community includes scattered native species, which are too few and widespread to form a distinct native habitat. These native species include common fiddleneck (*Amsinckia menziesii*), California buckwheat (*Eriogonum fasciculatum*), coyote bush (*Baccharis pilularis*), and broom baccharis (*Baccharis sarothroides*). These shrubs comprised less than 1 percent absolute cover on the project site. There is 10.13 acres of non-native grassland on the project site.

Non-native Grassland: Broadleaf-dominated

Non-native grassland: broadleaf-dominated is a subset of non-native grassland that is dominated by one or several non-native, invasive broadleaf species accounting for more the 50% of total vegetation cover (Oberbauer et al. 2008). This habitat type is often associated with disturbance, and occurs on-site within a small, disturbed area. On-site, this vegetation community is dominated by tumbleweed (*Salsola tragus*). There is 0.07 acres of non-native grassland broadleaf-dominated on the project site.

Urban/Developed

Urban/developed areas consist of any land that has been constructed upon, containing permanent or semi-permanent structures, pavement or hardscape, or landscaped areas that are regularly maintained and/or irrigated (Oberbauer et al. 2008). Urban/developed land occurs as residential development, including ornamental vegetation and public roads within the 50-foot survey buffer (see **Figure 7**). There is 0.17 acres of urban/developed land on the project site.

Project Information

Implementation of the project would require removal of all vegetation on the project site as part of the project grading phase of the project.

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

Applicable Regulations

For purposes of this analysis species would be considered sensitive if they are: (1) covered species or narrow endemic species under the MHCP (SANDAG 2003); (2) listed by state or federal agencies as threatened or endangered or are proposed for listing; (3) on California Rare Plant Rank 1B (considered endangered throughout its range) or California Rare Plant Rank 2 (considered endangered in California but more common elsewhere) of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California (CNPS 2024); or (4) considered rare, endangered, or threatened by the State of California's Natural Diversity Database (CNDDB) (CDFW 2025a, 2025b, 2025c) or local conservation organizations or specialists. Noteworthy plant species are considered those that are on California Rare Plant Rank 3 (more information about the plants' distribution and rarity needed) and California Rare Plant Rank 4 (plants of limited distribution) of the CNPS Inventory. Sensitive vegetation communities are those identified in the MHCP (SANDAG 2003), Holland (1986), the Jepson Online Interchange (Chesser et al. 2024) or identified by the City (2001).

Federal Regulations

The federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered “take” under the ESA. Section 9(a) of the ESA defines “take” as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.” The ESA is administered by the USFWS.

The federal Migratory Bird Treaty Act of 1918 (MBTA) was established to provide protection to the breeding activities of migratory birds throughout the U.S. The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations.

All wetland areas, including vernal pools and non-wetland waters of the U.S., are considered sensitive. Wetlands and non-wetland waters are under the jurisdiction of the U.S. Army Corps of Engineers. Streambeds and associated vegetation are under the jurisdiction of CDFW.

State Regulations

CEQA requires an environmental review for projects with potentially adverse impacts on the environment. Adverse environmental impacts are typically mitigated in accordance with state laws and regulations.

The California ESA is similar to the federal ESA in that it provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.3 of the California Fish and Game Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs.

City of Escondido Regulations

The City is in the process of preparing a Sub-area Plan under the Multiple Habitat Conservation Plan (MHCP). The MHCP is a habitat conservation plan for the seven jurisdictional areas within the northern subregion of San Diego County, including Escondido (SANDAG 2003). Under the MHCP, the City has prepared a draft Sub-area Plan that addresses land conservation issues (City of Escondido 2001). This draft Sub-area Plan identifies a series of FPAs within which some lands will be dedicated for preservation of native habitats. These areas contain both “hard line” areas, which will be preserved as open space, and “softline” areas, which will include both development and open space to be determined through the planning process. The project site is outside of any FPAs.

The City has a tree protection ordinance that addresses “protected” trees and “mature” trees (Municipal Code Section 33-1068.C, Vegetation Removal Permits). The ordinance defines protected trees as any oak (*genus Quercus*) which has a 10-inch or greater diameter at breast height (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. A mature tree is defined as any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple

stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree (*genus Quercus*), shall have a diameter four inches or greater when measured at 4.5 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 (Municipal Code Section 33-1052, Definitions). Per the City Municipal Code Section 33-1068.C (2)(a), any mature tree that will be removed will be replaced at a 1:1 ratio and any protected tree that will be removed will be replaced at a 2:1 ratio. The preferred replacement is a tree(s) of equal size and caliper, per section 33-1069 (b)(4).

Sensitive Plant Species

Several sensitive plant species have potential to occur within two miles of the project site. However, these species were not observed on-site during the biological survey, and they are not expected to occur on-site. Therefore, the project is not expected to impact sensitive plant species.

Sensitive Wildlife

No sensitive wildlife species were identified on-site during the biological survey. One sensitive species, Cooper's hawk (*Accipiter cooperii*), has moderate potential to occur within the project site. Due to the presence of floral resources, it was originally determined that Crotch's bumble bee (CBB; *Bombus crotchii*) has a moderate potential to occur on-site, and focused surveys for this species were conducted. Based on focused surveys conducted for CBB, which were negative, it was determined that there is low potential for this species to occur on-site. These species are discussed in detail below. Sensitive wildlife species known to occur within two miles of the project site based on a database review are presented with an evaluation of their potential for occurrence in Attachment 4 of the biological resources letter report (**Appendix C**) of this document.

Cooper's Hawk

Cooper's hawk is a CDFW watch list species and is a MHCP-covered species. Cooper's hawk occurs in mature forest, open woodlands, wood edges, river groves, and parks/residential areas. They tend to hunt in broken woodland or at habitat edges, and nest in deciduous trees approximately 20 to 50 feet above the ground (CDFW 1990). There is moderate potential for this species to occur on-site. During the initial survey, trees taller than 10 feet (primarily ornamental) were observed on neighboring properties, which have potential to support nesting for this species. No direct impacts to nesting Cooper's hawks are expected on-site, but indirect impacts due to construction noise may impact individuals nesting in off-site trees. Additionally, the proposed project may result in loss of foraging habitat for Cooper's hawk. Impacts to Cooper's hawk would be considered significant (**Impact BIO-1**). Implementation of mitigation measure **MM-BIO-1a** for habitat-based mitigation of sensitive natural communities (i.e., non-native grassland and non-native grassland: broadleaf-dominated) and **MM-BIO-1b** for avian protection requirements would reduce impacts on Cooper's hawk to a level **less than significant**.

MM-BIO-1a Sensitive Upland Vegetation

The project would permanently impact 10.13 acres of non-native grassland and 0.07 acres of non-native grassland: broadleaf-dominated vegetation, which are categorized as Group E Annual Grassland habitat. **Table 6** provides the acreage of mitigation required per the mitigation ratios outlined in the MHCP (SANDAG 2003). Mitigation may occur through the following two options:

- (1) purchase non-native grassland credits at Daley Ranch Conservation Bank, an approved mitigation bank, if available; or
- (2) if non-native grassland credits are not

available, then preservation of non-native grassland habitat at an off-site location within a FPA may occur (SANDAG 2003)

Table 6. Mitigation for Permanent Impacts to Vegetation Communities/Land Cover Types

Habitat Type	MHCP Group	Permanent Impacts (acres)	Mitigation Ratio	Mitigation Required (acres)
Non-native Grassland	Group E Annual Grassland	10.13	0.5:1	5.07
Non-native Grassland: Broadleaf-dominated		0.07	0.5:1	0.03
Developed Land	N/A	0.17	--	0
TOTAL		10.38	--	5.10

Source: RECON 2025a.

MM-BIO-1b Avian Protection Requirements

To remain in compliance with the Migratory Bird Treaty Act and California Fish and Game Code 3503, no direct impacts shall occur to any nesting birds or their eggs, chicks, or nests during the breeding season. This project may directly impact nesting birds on or adjacent to the property if construction occurs during the typical breeding season for birds and raptors (January 1 to September 15). While no trees occur within the project boundary, mature trees occur within 150 feet on all sides of the proposed project footprint. Additionally, there is potential for ground nesting birds to nest within the project footprint. The following measures are recommended to avoid or mitigate potential impacts to nesting birds:

- To avoid impacts to nesting birds and raptors, it is recommended that project construction occur outside of the breeding season. If construction must occur within the bird breeding season, a qualified biologist shall determine if any active bird or raptor nests occur on or in the immediate vicinity of the project. The entire project footprint as well as a 150-foot buffer shall be surveyed for nesting birds and raptors, where access allows. If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of a temporal avoidance buffer.
- Surveys shall be conducted at the appropriate time of day, no more than three days (72 hours) prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be avoided using

an avoidance buffer of sufficient distance that no harassment or harm occurs to the nesting pair or its chick/eggs. A qualified biologist shall make the determination for the avoidance buffer distance considering the species tolerance for human disturbance and through regular monitoring checks to ensure the avoidance buffer is sufficiently large to avoid harm to the nest. If regular biological monitoring by a biological monitor does not occur, the nest shall be fenced a minimum of 200 feet (500 feet for special-status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 15 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 to September 15) to avoid direct or indirect (noise) take of listed species.

Crotch's Bumble Bee

Crotch's bumble bee (CBB) is a candidate endangered species under CESA. CBB occurs within grasslands and shrublands, particularly in areas with abundant floral resources. They nest underground, occasionally within existing rodent burrows or debris piles (Hatfield et al. 2015). CBB was not observed on the site during focused surveys conducted in June and July of 2025. This species has a low potential to forage within the project site in the future given the limited availability of suitable floral resources on-site. While mammal burrows are present within the project boundary, it was determined based on the focused surveys that there is a low potential for CBB to nest or overwinter on-site. The survey report for the CBB surveys is provided in Attachment 5 of the biological resources letter report (**Appendix C** of this document) and provides additional details on the methods and results of the focused CBB surveys.

Based upon the survey results, there is a low potential for CBB to occur on-site. During the surveys, CBB was not observed but flowering resources on which CBB could forage were present. Flowering plants observed included common fiddleneck, greenstem filaree, long-beak filaree, orchard morning-glory (*Convolvulus arvensis*), smooth cat's-ear (*Hypochaeris glabra*), small-flower catchfly (*Silene gallica*), wild radish (*Raphanus raphanistrum*), and Bermuda buttercup (*Oxalis pes-caprae*). Additionally, existing rodent burrows and debris piles on-site may provide nesting habitat for CBB. Direct impacts to this species could occur if floral resources on which this species is foraging are removed, trimmed, or trampled during project work activities conducted during the Colony Active Period (April 1 and August 31). These represents a significant impact (**Impact BIO-2**), and impacts would be significant, absent mitigation. One pre-construction focused survey would be required to verify the presence or absence of CBB immediately prior to construction, in accordance with mitigation measure **MM-BIO-2**.

MM-BIO-2 Crotch's Bumble Bee Take Avoidance

A pre-construction focused survey would be required to verify the presence or absence of Crotch's bumble bee at the time of construction as described below. Prior to the Notice to Proceed for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the City of Escondido's Development Services Department shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction plans:

- To avoid impacts to Crotch's bumble bee, removal, trimming, or trampling of habitat in the proposed area of disturbance should occur outside of the Colony Active Period between April 1 and August 31. If removal of floral

resources must occur during the Colony Active Period, a qualified biologist shall conduct one pre-activity survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

- The pre-activity survey must be conducted by a qualified biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023). The qualified biologist should hold the appropriate authorization (e.g., Memorandum of Understanding) for capture/handling if necessary for identification. The pre-activity survey shall be conducted within 7 days of the start of removal, trimming or trampling of habitat and within 50 feet of project work resulting in removal, trimming or trampling of habitat.
- If the pre-activity survey does not identify Crotch's bumble bee individuals on-site during the Colony Active Period based on surveys described above, removal of floral resources can proceed within the Colony Active Period without further avoidance measures.
- If the pre-activity survey does identify Crotch's bumble bee individuals on-site, the qualified biologist shall notify CDFW and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. Take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (California Fish and Game Code sections 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, Section 786.9) under the CESA.

With implementation of mitigation measures **MM-BIO-1a**, **MM-BIO-1b** and **MM-BIO-2**, potential indirect impacts to Cooper's hawk and other avian species protected by the MBTA and potential direct impact to CBB would be **less than significant**.

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

Sensitive Vegetation Communities

The project would convert the entire 10.38-acre project site to residential uses, permanently impacting 10.13 acres of non-native grassland, 0.07 acres of non-native grassland: broadleaf-dominated, and 0.17 acres of developed land. Non-native grassland and non-native grassland: broadleaf-dominated are categorized as MHCP Habitat Group E Annual Grassland group and are considered sensitive vegetation communities (SANDAG 2003) and the project's impact would be considered significant (Impact MM-BIO- 3). Implementation of mitigation measure **MM-BIO1a**, detailed earlier in this section identifies a 0.5:1 mitigation ratio for impacts to non-native grassland and non-native grassland: broadleaf-dominated. Implementation of mitigation measure **MM-BIO-1a** would reduce this impact to **below a level of significance**.

- c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? No Impact**

The site contains no features that would suggest the presence of any state, federal, or local jurisdictional wetlands or waters of the United States. No jurisdictional wetlands would be impacted by project implementation. Therefore, **no impact** is identified.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? Less than Significant**

The project site does not currently function as a significant wildlife movement corridor as it is surrounded by residential development and roads, which ultimately restrict its use by wildlife. Other grassland dominated areas occur within the vicinity of the project site, including within the parcel directly to the north. However, these areas are fragmented by development and do not comprise a continuous wildlife corridor. The Daley Ranch Preserve, which is approximately 0.9 miles east of the project site, is a contiguous block of habitat comprising approximately 3,000 acres that provides habitat for many avian species, some of which may use the project site for foraging. Movement of other terrestrial wildlife from the Daley Ranch Preserve to the project site is restricted by the surrounding development. Riparian hardline preserve land occurs approximately 0.4 miles southwest of the project site along Reidy Creek, and this riparian vegetation has potential to support least bell's vireo (*Vireo bellii pusillus*). However, suitable habitat does not occur on-site for least bell's vireo, and they are unlikely to use the project site for foraging or dispersal. Impact would be **less than significant**.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact**

The affords protection to mature and protected trees. Based on the City of Escondido Code of Ordinances (Chapter 33, Article 55 Grading and Erosion Control), a mature tree is defined as (1) an oak tree (genus *Quercus*) with a 4-inch diameter at breast height (DBH) or greater for a single stem (i.e., trunk) or one of the multiple stems, or (2) any other self-supporting woody perennial plant, native or non-native, with an 8-inch DBH or greater for a single stem or one of the multiple stems. A protected tree is defined as (1) an oak tree with a 10-inch DBH or greater (i.e., for a single stem, or one of the multiple stems; or (2) any other species or individual specimen listed on the local historic register or (3) any other species or individual specimen determined to substantially contribute to the historic character of a property or structure listed on the local historic register. Any mature or protected trees that cannot be preserved on-site during the proposed development would require a vegetation removal permit and mitigation in the form of replacement trees, subject to approval by the City.

There are trees within the neighboring private residences, but no trees occur within the project boundary, thus no trees defined as mature or protected occur within the proposed project footprint. Therefore, the project would not impact mature or protected trees (RECON 2025a). **No impact** is identified.

- 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? No Impact**

The North County Multiple Habitat Conservation Program (MHCP) is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in Northwestern San Diego County. The project site occurs within the boundaries of the Draft Escondido MHCP Sub-area Plan, which has not yet been approved or adopted. The project site is not located within a Focused Planning Area (RECON 2025a). As a result, proposed activities at the project side would avoid direct impacts to the MHCP Conservation Areas and would not conflict with the MHCP Conservation

Objectives. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Mitigation for impact to non- native grassland and non-native grassland: broadleaf-dominated is at ration that is consistent with the MHCP. **No impact** is identified.

3.5 Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

A cultural resources study was prepared for the project by RECON (RECON 2025b) The complete report is included as **Appendix D** of this document.

Records Search

As part of the cultural resources study, a records search request of the archives at the South Coastal Information Center (SCIC), San Diego State University, of the California Historical Resources Information System (CHRIS) for San Diego County, was completed. The record search area encompasses the project area and a search radius of one mile around it.

The SCIC records search indicated that there have been 43 cultural investigations conducted within one mile of the project site, three of which include the project site. The record search also indicated that 23 cultural resources are recorded within one mile of the project site. These cultural resources included 18 prehistoric sites, three historic resources, and two multi-component (comprising both prehistoric and historic- era resources) resources. The prehistoric resources include bedrock milling features, pictographs, lithic scatters, lithic scatters including ground stone, ceramic scatters, shellfish scatters, faunal remains, and a possible hearth. The historic-era sites include a bench flume and trash scatters. The multi-component sites include bedrock milling features, lithic scatters, a ceramic scatter, an adobe house, a single-family property, a foundation, a rock drain, and a trash scatter. No historic addresses occur within the project site.

One previously recorded cultural resource occurs within the project site. P-37-012547 was recorded in 1991 by ERC Environmental as a possible historic house location and historic trash deposit. The recording noted a possible rock house foundation along with a trash deposit that included whiteware ceramic fragments, windowpane glass, burned roofing tile, barbed wire, wooden posts, iron fragments, a modern adobe brick fragment with adhered concrete, and an Aristocrat silverplate fork. The site area measured 82 feet north/south by 66 feet east/west. A subsequent site visit was made by Ogden Environmental and Energy Services (Ogden) in 1993 to clear up a discrepancy between the original recording and the Archaeological Survey Report prepared for the Escondido Master Plan of Parks, Trails, and Open Space concerning the presence of an adobe structure; the site visit confirmed no adobe structure. During this site visit, Ogden contacted the landowner (Ms. Bernice Nack), living in the house adjacent to the project site that she and her husband built in 1936/37, where she confirmed her family had burned trash within the site area. Ogden then stated that P-37-012547 would require testing to determine significance per CEQA Guidelines (Anderson and Clevenger 1993).

Native American Heritage Commission and Tribal Outreach

A letter was sent on April 4, 2025, to the Native American Heritage Commission (NAHC) requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the proposed project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the proposed project. A response letter from the NAHC was received on April 16, 2025, indicating that the results were positive. The NAHC also provided a list of Native American tribes who may have knowledge of cultural resources within the project site and vicinity.

RECON sent tribal scoping letters via email and hard copy letter on May 29, 2025, to the tribal list provided by the NAHC. On May 29, 2025, RECON received an automated response from Bernice Paipa representing the Sycuan Band of the Kumeyaay Nation; however, this response did not reference the current project and cited a return date that occurred nearly two years ago. Ray Teran representing the Viejas Band of Kumeyaay Indians (Viejas) on May 29, 2025, stated in part that Viejas has determined that the project site has cultural significance or ties to Viejas, that cultural resources have been located within or adjacent to the project site, and that they request that a Kumeyaay cultural monitor be on-site for ground-disturbing activities and to inform them of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Art Bunce, tribal attorney representing the Barona Band of Mission Indians (Barona) on May 29, 2025, stated in part that due to the location, nature and scope of the project, Barona requests a copy of the cultural resources report.

Archaeological Pedestrian Site Survey

RECON archaeologist Nathaniel Yerka, accompanied by Jessica Alexander, a Luiseño Native American representative from Saving Sacred Sites, performed the archaeological resources survey on May 29, 2025. RECON identified one previously recorded historic-era resource (P-37-015247, a historic-era trash scatter; within the project site. The historic-era resource was updated by RECON.

The survey commenced in the northwest project site corner, employing generally southeast-northwest transects that translated across the project site from west to east. The project site consists of a gently rolling landscape that generally slopes to the west-southwest. The ground surface is covered in non-native grasses and weeds that present less than 20 percent visibility. A small knoll exhibiting bedrock, accumulated rock, and other debris occurs in the northwest quadrant of the project site. The project site contains perimeter chain-link fencing along the eastern, southern, and western boundaries with an entry/exit gate in the northwest project site corner. A modern concrete culvert exits the project site

along the western boundary to then cross beneath Conway Road. A two-foot diameter metal tank with a center bolt was observed in the northwest quadrant of the project site. An overhead utility alignment runs adjacent to the eastern project site boundary and three streetlights supporting Conway Road run adjacent to the western project site boundary. Several T-posts were observed across the project site marking the location of small rock piles that present hazards to periodic discing and mowing.

RECON and Saving Sacred Sites visited the SCIC mapped location of P-37-012547 and did not observe any cultural material. However, RECON did observe cultural material similar to that listed in the 1991 recording on a small knoll located approximately 180 feet to the west within the project site. The topography of this location matches the topography and landscape description noted in the 1993 updated recording. Observed material covered a 79-(north/south)-by-55-(east/west)-foot area spread across a small knoll with bedrock, secondarily placed rock, burned rock, and tree stumps. Material consisted of three separate piles of various cut lengths of wooden utility poles (northern two piles intentionally split; possibly for fencing material), a 9-by-9-foot scatter of windowpane glass, a colorless glass bottle base fragment (reads "D ... / 101 ..."), melted cobalt glass fragment, melted glass tumbler rim fragment, metal paint can, metal banding (possibly for a barrel), barbed wire, wire, bed or chair spring pieces, assorted metal pieces, modern adobe brick fragments, whiteware plate or saucer fragments, with faunal material consisting of one burned Chamidae sp. Fragment (RECON 2025b).

California Register of Historical Resources Significance Criteria

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. The criteria established for eligibility for the CRHR are directly comparable to the NRHP criteria.

To be eligible for listing in the CRHR, a building must satisfy at least one of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic value.
4. It has yielded, or has the potential to yield, information important to the pre-history or history of the local area, California, or the nation.

In addition to meeting one of the above criteria, a resource must have integrity; that is, it must evoke the resource's period of significance or, in the case of criterion 4, it must retain reliable research data (California Code of Regulations Title 14, Chapter 11.5 Section 4852(c)). Most archaeological sites that qualify for listing do so under criterion 4.

If a project would cause a substantial adverse change in the significance of a historical resource, mitigation is required under CEQA. A substantial adverse change is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Avoidance of the historical resource through project redesign is the preferred mitigation measure. If redesign is not feasible, minimizing impacts by limiting the degree of impacts or reducing the impact through construction monitoring are mitigation options.

P-37-012547 does not qualify under criteria 1 and 2 because no significant event or person could be associated with the resource. Walter and Bernice Nack were former owners of the project site and previously lived in the residence adjacent to the project site, passing away in 1977 and 2003, respectively (RECON 2025b).

Additionally, the resource does not qualify under criterion 3 because the criterion applies to the built environment. The scatter of cultural constituents making up P-37-012547 is not a structure, building or portion thereof, so it does not exhibit the type of characteristics required for significance under this criterion. P-37-012547 does not qualify under criterion 4 because it is not likely to yield additional information beyond the recorded constituents. It is known through documented communication between Ogden and Ms. Bernice Nack, the former owner of the property, that the Nack family had previously burned trash within the site area. Therefore, the site is not likely to yield information important to history; the recording of the cultural constituents of P-37-012547 has exhausted its research potential (RECON 2025b).

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? Less Than Significant Impact

City of Escondido Historical Sites

The determination of significance for historic resources within the City is based on age, location, context, association with an important person or event, uniqueness, and integrity under the City's Historic Resources Code (Article 40, Section 33-794, Escondido Zoning Ordinances). The City has developed the following 13 criteria to address when evaluating a possible historic resource for inclusion on the list of historic landmarks or the local historic register:

1. Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, pre-history, or development of the City of Escondido, region, state or nation;
2. Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
3. Escondido historical resources that are connected with a business or use that was once common but is now rare;
4. Escondido historical resources that are the sites of significant historic events;
5. Escondido historical resources that are fifty (50) years old or have achieved historical significance within the past fifty (50) years;
6. Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area or district;
7. Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type;
8. Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;

9. Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;
10. Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;
11. Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities;
12. Escondido archaeological site that has yielded, or may be likely to yield, information important in pre-history;
13. Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests. (Ord. No. 2000-23, § 4, 9-13-00; Ord. No. 2008- 16, § 4, 7-16-08).

A historical resource must meet at least two of these criteria to be eligible for inclusion on the local register of historic places or be given historic landmark status. P-37-012547 does not meet the baseline elements in the criteria for (1) through (11). The scatter of cultural constituents making up P-37-012547 are directly linked to the Nack family, who are not identified as persons who significantly contributed to the culture, history, pre-history, or development of the city, region, state, or nation. The scatter of cultural constituents making up P-37-012547 are not a structure, building or portion thereof, so the resource does not exhibit the type of characteristics required for significance under these criteria. P-37-012547 does not qualify under criterion number (12) as the cultural constituents observed are historic-era items that are not likely to yield additional information beyond their recordation. P-37-012547 does not meet the baseline elements in criterion number (13) as the recorded cultural constituents are not likely a site that could qualify as a significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests (RECON 2025b).

The City has also designated a number of areas as historic districts, including the Westside Historic District. Boundaries for historic districts were determined by the Escondido Community Development Department and local residents. Criteria used in determining a potential district in Escondido include the following:

- The proposed historical district as a geographically definable area possessing a significant concentration or continuity of sites, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development;
- The collective historical value of the proposed district may be greater than that of each individual resource; and
- The designation is in conformance with the purpose of the City's historic preservation provisions set forth in the City's General Plan.

P-37-012547 does not possess the foundational nominating criteria to qualify as part of a historic district. No other significant or potentially significant prehistoric or historic cultural resources were observed during the survey of the project site. Therefore, the project would not adversely affect known historical resources and impacts would be **less than significant**.

- b) **Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? Less Than Significant with Mitigation Incorporated**

The project site has been fully disturbed by past agricultural ground-disturbing activities, such as periodic discing and mowing. Because the files at the SCIC did indicate previously recorded archaeological cultural resources in the project and its vicinity, and because the project would require subsurface grading beyond the levels of previous disturbance there is a potential for impacts to previously unidentified subsurface archaeological resources. This represents a significant impact (**Impact CR-1**) and mitigation is required.

Implementation of Mitigation Measures **MM-CR-1** through **MM-CR-10**, which would be required as a condition of project approval, would reduce the impacts to below a level of significance.

MM-CR-1 Prior to the issuance of a grading permit, the Applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a Pre-Excavation Agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe"). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures **M-CR-2** through **M-CR-10**, and the following information:

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

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

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

MM-CR-4 During the initial grubbing, site grading, excavation or disturbance of the ground surface (including both on- and off-site improvement areas), the qualified archaeologist and the Native American monitor shall be present full-time. If the full-time monitoring reveals that the top soil throughout the Project impact area (both on and off-site) has been previously removed during the development of the roads and buildings within the Project area, then a decrease of monitoring to part-time monitoring or the termination of monitoring can be implemented, as deemed appropriate by the qualified archaeologist in consultation with the Native American monitor. The frequency of subsequent monitoring shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring considering these factors. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits (i.e., soil conditions are comprised solely of fill or granitic bedrock).

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

MM-CR-6 If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code Sections

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

Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

MM-CR-7 All sacred sites, significant tribal cultural resources, and unique archaeological resources encountered within the Project area shall be avoided and preserved as the preferred mitigation. The avoidance and preservation of the significant tribal cultural resource or unique archaeological resource must first be considered and evaluated in consultation with the TCA Tribe(s) as required by CEQA and in compliance with all relevant mitigation measures for the Project. If any significant tribal cultural resource or unique archaeological resource has been discovered and such avoidance or preservation measure has been deemed to be infeasible by the City's Director of Community Development (after a recommendation is provided by the qualified archaeologist, in consultation with the TCA Tribe(s), making a determination of infeasibility that takes into account the factors listed in California Public Resources Code Sections 21061.1, 21081(a)(3), and CEQA Guidelines section 15091, and in accordance with all relevant mitigation measures for the Project), then culturally appropriate treatment of those resources, including but not limited to funding an ethnographic or ethnohistoric study of the resource(s), and/or developing a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. No artifact sampling for analysis is allowed, unless requested and approved by the consulting TCA Tribe(s). Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

MM-CR-8 As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or their authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of

the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code Section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources

Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on-site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination

MM-CR-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any cataloging of those resources. Moreover, if the qualified archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the Native American monitor may, at their discretion, collect said resources for later reburial on the Project site or storage at a local curation facility. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe for reburial on the Project site. Should the TCA Tribe(s) decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

MM-CR-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, that describes the results, analysis, and conclusions of the archaeological monitoring program and any data recovery program on the Project site, shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources. A copy of the final report will be submitted to the South Coastal Information Center after approval by the City.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries? Less Than Significant

The cultural resource study prepared for the project did not indicate the likelihood of human remains on the site (RECON 2025b). Additionally, existing regulations through the California Health and Safety Code Section 7050.5 state that if human remains are discovered during project construction, no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has

been made. If the San Diego County Coroner determines the remains to be Native American, the NAHC shall be contacted within a reasonable timeframe. Subsequently, the NAHC shall identify the Most Likely Descendant. The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Furthermore, while there is no evidence of human remains on the project site, as provided by Mitigation Measures **MM-CR-1** through **MM-CR-10**, an archaeological monitor and a TCA monitor shall be present during the earth moving and grading activities to ensure that any resources found during project grading would be protected. Mitigation measure **MM-CR-8** further details the requirements should human remains be encountered during project construction. With mitigation, the project would not disturb any human remains, including those interred outside of formal cemeteries. Impacts would be **less than significant**.

3.6 Energy

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

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

Construction activities for the project would include grading of the project site, building construction and application of architectural coatings to the proposed buildings, and paving of the proposed parking areas and drive aisles. The project would consume energy resources during construction in three general forms:

- 1) petroleum based fuels used to power off-road construction vehicles and equipment on the site, construction worker travel to and from the project site; 2) electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance); and 3) electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power.

Operational energy use would include, but not be limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips.

The project has been designed and would comply with regulatory compliance measures outlined by the State and City related to air quality, greenhouse gas emissions, transportation/circulation, and water supply. Additionally, the project would be constructed in accordance with all applicable Building and Fire Codes, including the City's Green Building Standards and the State's CALGreen Building Code, which require efficiency and energy conservation. By virtue of compliance with these codes, the proposed project would not cause wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, potential impacts associated with the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation would be less than significant.

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 all Federal, State, and City requirements related to the consumption of electricity, including but not limited to, CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed buildings, including enhanced insulation, use of energy efficient lighting and appliances as well as requiring a variety of other energy efficiency measures to be incorporated into all of the proposed structures. In 2022, the City adopted the 2022 Building Code, 2022 Green Building Standards Code and the 2022 California Energy Code to establish green building development standards for new projects with the intent to promote a healthier environment by encouraging sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. The proposed project would comply with the relevant building codes. Therefore, the proposed project would not conflict with or obstruct a state or local plan, and by virtue of compliance with state and local plans, the proposed project would not cause wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts would be **less than significant**.

3.7 Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
b) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?			X	
c) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?			X	
d) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				X
e) Result in substantial soil erosion or the loss of topsoil?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
g) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		X		
h) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
i) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

A preliminary geotechnical evaluation was prepared for the project by GeoTek, Inc (GeoTek) in 2024 (GeoTek 2024a) and an update letter was prepared in 2025 (Geotek 2025). The update letter confirmed that the project plans have been prepared in substantial conformance with the geotechnical recommendations contained in the 2024 geotechnical investigation. The complete report and update letter are included as **Appendix E.1** and **Appendix E.2** of this document. The purpose of the report and update letter were to evaluate the geotechnical engineering and geologic conditions at the project site.

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. No Impact**

The project site is located within a seismically active region, as is all of Southern California; however, the project site is not located on or adjacent to any known active faults. According to California Earthquake Hazard Zone Application, the City of Escondido is not identified as a jurisdiction affected by Alquist-Priolo Earthquake Fault Zones (California Department of Conservation 2021). According to the geotechnical engineering report (GeoTek 2024a) the site is not situated within a County of San

Diego fault zone, earthquake induced landslide or liquefaction zone. The nearest known active faults to the project site are the Newport-Inglewood-Rose Canyon Fault Zone located approximately 20 miles southwest of the project site and the Elsinore Fault Zone located approximately 13.3 miles northeast of the project site. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. **No impact** is identified for this issue area.

b) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking? Less Than Significant Impact

The proposed project is located in seismically active Southern California. The type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event. While the project site does not have any faults that cross the property, the project site is approximately 13.3 miles from the Elsinore Fault Zone (Julian section). This fault zone is capable of producing a magnitude 7 or larger event. The construction of residential homes is common in earthquake prone areas like Southern California, including the area surrounding the project site. The geotechnical investigation included in **Appendix E.1** included an evaluation of site seismic characteristics in accordance with the California Building Code (CBC). Based on the site's seismic characteristics, the CBC provides building code guidelines to minimize the effects of seismic ground shaking. All structures on the site would be designed in accordance with seismic parameters of the latest CBC. Therefore, with adherence to the building code standards, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be **less than significant**.

c) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction? Less than Significant Impact

The geotechnical investigation for the project (GeoTek 2024a) noted the site is not within an Alquist-Priolo Earthquake Fault Zone, that no active or potentially active faults are present at the project site, so the site is not considered susceptible to surface rupture or seismic-related ground failure.

Liquefaction occurs when loose, saturated sands and silts are subjected to strong ground shaking. The strong ground shaking causes pore-water pressure to rise, soils lose shear strength and temporarily behave as a liquid; potentially resulting in large total and differential ground surface settlements as well as possible lateral spreading during an earthquake.

Based on the lack of shallow groundwater and presence of shallow hard bedrock underlying the property, the potential for liquefaction and seismic settlement to occur on the project site is considered to be nil. Accordingly, the potential for liquefaction induced lateral spreading and seismic induced settlement is also considered negligible (GeoTek 2024a). Additionally, the project site is not located within a liquefaction hazard zone as mapped by the State of California Seismic Hazard Zone mapping (California Department of Conservation 2021). Impacts would be **less than significant**.

d) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides? No Impact

Per the geotechnical report prepared for the project (GeoTek 2024a) there was no evidence of landslides or slope instabilities observed during the geotechnical field work. **No impact** is identified for this issue area.

e) Result in substantial soil erosion or the loss of topsoil? Less than Significant Impact

Project site topography is gently sloping to the southwest ranging from a high of approximately 792 feet AMSL to a low of 762 AMSL (Geotek 2024a). The site is vacant and was used as an agricultural field prior to the 1990s. The site would be graded to prepare for development. The project would be under the State Water Resources Control Board (SWRCB) Construction General Permit, which prohibits sediment or pollutant release from the project site during construction and requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) that would incorporate erosion and sediment control measures (e.g., silt fencing, sandbags, wattles) during and after grading operations to stabilize these areas. Permanent vegetation would also be required to stabilize graded areas. The project would not result in substantial soil erosion or the loss of topsoil. Impacts would be **less than significant**.

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

The project site is not located on or adjacent to any known active faults nor is the site underlain by soils that are conducive to landslides. Based on the lack of shallow groundwater and presence of shallow bedrock earth materials underlying the property, the potential for liquefaction to occur on the subject property is considered low. Accordingly, the potential for liquefaction induced lateral spreading and seismic induced settlement is also considered to be low. Evidence of ancient landslides or slope instabilities at this site was not observed during the geotechnical investigation. Thus, the potential for landslides is considered negligible. (GeoTek 2024a). Additionally, the project site is not located within a liquefaction hazard zone as mapped by the State of California Seismic Hazard Zone mapping (California Department of Conservation 2021). The project would not be located on a geologic unit or soil that is unstable, or that would become unstable, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be **less than significant**.

g) 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 with Mitigation Incorporated

Based upon the result of subsurface exploration conducted as part of the geotechnical investigation for the project (GeoTek 2024a), subsurface conditions on the project site area consist of undocumented fill, older alluvium, and granitic bedrock. The fills were found to extend from the ground surface to approximately 1 to 2 feet below existing grades. These materials are likely the result of the previous agricultural use of the site and generally consist of sandy silts and silty sands. Older alluvial soils were encountered in various borings, from below the undocumented fill to depths of about 3 to 5 feet below existing grades. These materials are mostly composed of stiff to very stiff sandy clays. Granitic bedrock of diorite composition was encountered in all explorations from below the alluvial soils or undocumented fill to the maximum depth explored of 15.5 feet. The granitic bedrock materials encountered generally excavated as fine to coarse sands and silty sands. The on-site bedrock was observed to be severely to moderately weathered in the upper few feet, becoming less weathered and indurated with depth. While the expansion index test results obtained by GeoTek indicate that the site surficial soils have “very low” to “low” potential for expansion, the existing fill and older alluvium are not considered suitable for support of structural site improvements (GeoTek 2024a). This represents a **potentially significant impact (Impact GEO-1)** and mitigation is required.

Implementation of mitigation measure MM-GEO-1, which would be required as a condition of project. Approval would reduce this impact to below a level of significance.

MM-GEO-1 The project applicant shall implement the geotechnical recommendations identified beginning on pages 8 through 23 of the preliminary geotechnical report prepared by GeoTek (2024a) for the project site. These recommendations address earthwork considerations, design recommendations, post-construction considerations and plan review and construction observations.

- h) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? No Impact**

The project does not propose any septic tanks or alternative wastewater disposal systems. Water and sewer services for the project site and area are provided by the Escondido Water Company. **No impact** is identified for this issue area.

- i) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic features? Less Than Significant Impact**

A paleontological resources memorandum was prepared for the project by the San Diego Natural History Museum (SDNHM). The complete memorandum (SDNHM 2025) is included as **Appendix F** of this document.

SDNHM reviewed published geological maps covering the project site and surrounding area to determine the specific geologic units underlying the project site. The site-specific geotechnical evaluation report was also reviewed (GeoTek 2024a). Each geologic unit was subsequently assigned a paleontological resource sensitivity using the County of San Diego Guidelines for Determining Significance (2009). In addition, a search of the paleontological collection records housed at the SDNHM was conducted in order to determine if any documented fossil collection localities occur at the project site or within the immediate surrounding area. This information was reviewed alongside available information about planned development to determine whether impacts to paleontological resources are anticipated during project construction, and appropriate mitigation is proposed, if necessary. The SDNHM does not have any recorded fossil localities that lie within a one-mile radius of the project site.

Published geological mapping (Kennedy and Tan, 2007) covering the project area indicates that the proposed project has the potential to impact middle to late Pleistocene-age old alluvial flood plain deposits and Early Cretaceous-age intrusive igneous rocks. The site-specific geotechnical evaluation report also identifies undocumented fill across the project site (GeoTek 2024a). These geologic units are summarized below.

Undocumented Fill

Undocumented fill measuring one to two feet thick is present across much of the surface of the site (GeoTek 2024a). Fill generally consists of previously disturbed deposits associated with human activities. It is often composed of sedimentary materials mined from a nearby source (e.g., adjacent hilltops and slopes), but on occasion fill is imported to a project site and may be sourced from a distant location. The undocumented fill within the project site is likely associated with prior use of the site for agricultural purposes (GeoTek 2024a). Fossils are generally not collected from fill because any contained fossil remains have lost their original stratigraphic or even geographic contextual data and are thus of little scientific value. Therefore, undocumented fill is assigned no paleontological resource sensitivity (SDNHM 2025).

Pleistocene Old *Alluvial Flood* Plain Deposits

Middle to late Pleistocene-age old alluvial flood plain deposits are present at the surface or underlying the undocumented fill at shallow depths (one foot deep) throughout most of the project site and measure between one and four feet thick, as documented in geotechnical borings. These deposits were observed to consist of oxidized reddish-brown sandy clay. In three of the infiltration borings extending only two feet below ground surface (bgs), Pleistocene-age old alluvial flood plain deposits were observed to the maximum explored depth (GeoTek 2024a). These deposits consist of sediments deposited along the ancient flood plain of the ancestral Reidy Canyon Creek that flowed through Escondido during the Pleistocene. Scientifically significant vertebrate fossils have been collected from Pleistocene alluvial sediments similar to those underlying the project site at a number of widely distributed locations in coastal San Diego County, and have yielded a composite assemblage consisting of bony fishes, pond turtle, lizards, snakes, passenger pigeon, coot, duck, hawk, mole, shrew, field mouse, pack rat, kangaroo rat, gopher, squirrel, capybara, rabbit, dire wolf, tapir, horse, camel, deer, bison, mastodon, mammoth, and ground sloth. These scientifically significant finds demonstrate the preservational potential of this geologic unit. However, based on the lack of documented fossil localities from these deposits specifically within the City of Escondido, Pleistocene-age old alluvial flood plain deposits are assigned a moderate paleontological resource sensitivity (SDNHM 2025).

Cretaceous Intrusive Igneous Rocks

Early Cretaceous-age (approximately 126 million years old) intrusive igneous rocks (mapped as diorite by Kennedy and Tan 2007) underlie the entire project site in the relatively shallow subsurface below either the undocumented fill or Pleistocene-age old alluvial flood plain deposits (GeoTek 2024a). Igneous rocks were encountered at depths as shallow as one to five feet bgs and extended to the maximum explored depth (GeoTek 2024a). These rocks comprise part of the northern end of the Peninsular Ranges Batholith. Plutonic igneous rocks do not preserve fossils because they crystallize at extremely high temperatures and pressures several miles below the earth's surface. Consequently, these rocks are assigned no paleontological resource sensitivity (SDNHM 2025).

According to the paleontological resources memorandum, construction of the project has the potential to impact paleontological resources if: 1.) earthwork operations are involved, and 2.) if the earthwork operations would specifically impact previously undisturbed strata with high or moderate paleontological resource sensitivity (i.e., Pleistocene-age old alluvial flood plain deposits). Earthwork impacting geologic units assigned no paleontological resource sensitivity (i.e., undocumented fill and Cretaceous intrusive igneous rocks) is not anticipated to impact paleontological resources.

A review of project plans described in the geotechnical evaluation report indicates that cuts of up to 10 vertical feet and fills of up to six vertical feet would be required during site grading, and that three stormwater basins are proposed (two near the west property line, requiring cuts of two to six feet, and one near the southeastern corner of the site, requiring cuts of two feet and fills of about six feet).

The distribution of Pleistocene-age old alluvial flood plain deposits within the project site is patchy, and subsurface geotechnical exploration was generally limited to the perimeter of the site, so it is not possible at this stage to determine exactly where impacts to this geologic unit would or would not occur. Based on the limited subsurface exploration documented in geotechnical borings, it appears likely that Pleistocene-age old alluvial flood plain deposits are relatively thin (approximately five feet thick) in this area, and that the underlying Cretaceous intrusive igneous rocks are present at relatively shallow depths. Therefore, it is generally expected that impacts are most likely to occur at depths of less than five feet bgs. Based on the moderate paleontological resource sensitivity of Pleistocene-age

old alluvial flood plain deposits underlying the project site, construction of the project has the potential to impact paleontological resources.

This represents a significant impact (**Impact GEO-2**) and mitigation is required. Implementation of mitigation measures **MM-GEO-2**, which would be required as a condition of project approval, would reduce this impact to below a level of significance.

MM-GEO-2 The proposed project shall implement a limited paleontological resource mitigation program during construction to consist of initial monitoring of shallower excavation activities that are anticipated to impact Pleistocene-age old alluvial flood plain deposits (remedial grading, overexcavation, trenching for subgrade utilities, and excavation of stormwater basins). Based on initial observations made during monitoring, the monitoring schedule may be increased (i.e., to full-time) or reduced (i.e., to spot checks) at the discretion of the qualified Project Paleontologist. Monitoring is not recommended for earthwork impacting undocumented fill or intrusive igneous rocks. In addition, monitoring is not recommended for site clearing or placement of fill.

3.8 Greenhouse Gas Emissions

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

The City adopted an updated Climate Action Plan (CAP) on March 10, 2021, in an effort to reduce community-wide GHG emissions. The purpose of the CAP is to adopt a plan that is consistent with and complementary to the GHG emissions reduction efforts being conducted by the State of California through the Global Warming Solutions Act (AB 32). Therefore, GHG thresholds of significance are based on the adopted Escondido CAP (City of Escondido 2021a).

The implementation mechanism for the CAP is the Climate Action Plan Consistency Review Checklist. The Checklist allows new development projects a streamlined option for complying with CEQA requirements for addressing GHG emissions.

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.

Per the City's CAP, new discretionary projects subject to CEQA review that emit fewer than 500 metric tons of carbon dioxide equivalent (MT/year of CO₂e) annually would not contribute considerably to cumulative climate change impacts. A CAP Consistency Review Checklist was completed for the project and is included in **Appendix G** of this document.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less Than Significant Impact

The proposed project would generate greenhouse gas emissions through the construction and operation of the proposed residences. The City has adopted a CAP to demonstrate consistency with State objectives for limiting GHG emissions and as a threshold of significance for development projects. All projects deemed consistent with the City's CAP are determined to have **less than significant** GHG impacts.

The CAP has determined that projects that produce less than 500 metric tons carbon dioxide equivalent (MTCO₂e) annually have a less-than-significant greenhouse gas impact and are screened from further analysis. For single-family residential projects, the CAP determined that projects proposing 36 or fewer single-family residences produce less than 500 MTCO₂e (City of Escondido 2021a). The project proposes 29 single-family dwelling units, which would be less than the 36 single-family units established in the CAP. Therefore, the proposed project would generate less than 500 MTCO₂e, resulting in a **less-than-significant impact**.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? Less Than Significant Impact

The analysis above considered the GHG emissions of the proposed project in comparison to the City's GHG screening thresholds that are identified in the City's CAP, which was adopted in March 2021. Based on the CAP, a screening threshold of 500 MTCO₂e was used to determine significant cumulative GHG impacts as related to state and local GHG requirements. Since the project was found to produce less than 500 MTCO₂e, a less-than-significant GHG impact would be expected, and the project would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. A **less than significant impact** is identified for this issue area.

3.9 Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

A Phase I Environmental Site Assessment (ESA) was prepared for the project by GeoTek, Inc. (GeoTek 2024b). The complete report is included as **Appendix H** of this document. The purpose of this report was to identify and evaluate actual and potential environmental conditions on the project site.

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? Less Than Significant Impact

Hazardous materials include solids, liquids, or gaseous materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, could pose a threat to human health or the environment. Hazards include the risks associated with potential explosions, fires, or release of hazardous substances in the event of an accident or natural disaster, which may cause or contribute to an increase in mortality or serious illness or pose substantial harm to human health or the environment.

The proposed project would involve the transport of fuels, lubricants, and various other liquids needed for operation of construction equipment at the site on an as-needed basis by equipment service trucks. In addition, workers would commute to the project site via private vehicles and would operate construction vehicles and equipment on public streets. Materials hazardous to humans, wildlife, and sensitive environments, including diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets, would be present during proposed site improvements and construction of the project. The potential exists for direct impacts to human health from accidental spills of small amounts of hazardous materials from construction equipment; however, the proposed project would be required to comply with Federal, State, and City Municipal Code restrictions which regulate and control those materials handled on-site. Compliance with these restrictions and laws would ensure that potentially significant impacts would not occur during project construction.

In addition, as a residential project, the only hazardous materials anticipated for transport or disposal associated with the proposed project during operation are routinely used household products such as cleaners, paint, solvents, motor oil/automotive products, batteries, and garden maintenance products. It is anticipated that the use, handling, and disposal of these products would be addressed by household hazardous waste programs that are part of the Integrated Waste Management Plan of the County of San Diego and other Federal, State, and City Municipal Code regulations.

In summary, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be **less than significant**.

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

Historic Conditions

Based on a review of available historical information, as detailed in the Phase I ESA prepared for the project, the site appears to have been vacant land and/or utilized intermittently for agricultural purposes from at least 1967 until at least 1989. The project site appears to be vacant land from at least 2005 until at least 2020. The site appears similar to current conditions in an aerial photograph dated 2024. The project site has historically been utilized for agricultural purposes from at least 1967 until at least 1989. Historically, some agricultural sites have utilized pesticides that are currently considered a health risk and are no longer used. However, the project site was historically used for dry-land farming of oat hay and barley and no agricultural activities have occurred in the last 25 years. Agricultural usage of dry-land farming are not treated with pesticides or are infrequently treated, since the lack of water does not provide a desirable habitat for most agricultural pests. Therefore, the potential impact to near surface soils as a result of previous possible pesticide usage during agricultural operations is considered low and does not represent a recognized environmental condition to the project site.

The surrounding properties appear to have been vacant land and/or utilized for agricultural purposes with sporadic residences from at least 1939 until at least 1967. A structure can be observed to the north of the project site and the remaining surrounding properties appear to be vacant land and/or utilized for agricultural purposes in aerial photographs dated 1970. Additional structures can be observed to the north and east of the project site and the remaining surrounding properties appear to be vacant land and/or utilized for agricultural purposes in aerial photographs dated 1979 and 1985. A residential tract development can be observed to the south of the project site in an aerial photograph dated 1989. A residential tract development can be observed to the south of the project site in an aerial photograph dated 2005. No obvious changes can be observed at the project site in aerial photographs dated 2009, 2012, 2016 and 2020. The surrounding properties appear similar to current conditions in an aerial photograph dated 2020. None of the adjoining properties appear to represent a recognized environmental condition or environmental concern to the project site.

No additional analysis related to historic conditions, such as the site's agricultural use, was recommended in the Phase I ESA (GeoTek 2024b).

Database Results

The site does not appear on the environmental database report obtained for the Phase I ESA. There are three facilities listed in the database report within the various search distances specified by ASTM E 1527-21. These facilities are described in more detail in the Phase I ESA (**Appendix H**). Due to the nature of the listings; distance; lack of violations, spills or leaks; investigations and/or clean-ups, these facilities have not created a recognized environmental condition to the project site (GeoTek 2024b).

Site Observations

Based on their site reconnaissance, GeoTek characterized the site as currently vacant land. Visual evidence of hazardous substances and/or wastes was not observed during the site reconnaissance. No visual indication of spills or leaks was observed. No pungent or acrid odors were observed emanating from the site. No evidence of underground or above-ground fuel storage tanks (such as vent pipes, fill pipes, regular-shaped depressions, etc.) was observed on the site. GeoTek did not observe any other suspect equipment (transformers, elevators, hydraulic lift mechanisms, trash

compactors, etc.) which may contain poly-chlorinated biphenyls (PCBs) on the project site. No evidence of illegal or controlled substances being used or manufactured at the site or waste or trash at the site was observed. No visual indication of other conditions of concern (wells, drywells, cesspools, etc.) that would indicate a recognized environmental condition was observed during the site reconnaissance. Additionally, none of the adjoining properties appear to represent a recognized environmental condition or environmental concern to the project site (GeoTek 2024b).

In summary, there are no identified conditions on the project site that would create a scenario whereby the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. No additional analysis or assessment was recommended. Therefore, impacts would be **less than significant**.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Less Than Significant Impact

The project site is not located within one-quarter mile of an existing or proposed school. The closest school to the project site is Reidy Creek Elementary School, located 0.35 miles to the west at 2869 N. Broadway. Residential projects are not operators or generators of hazardous materials. Thus, operation of the proposed project would not involve the use, transport, or disposal of hazardous materials, nor would it generate hazardous emissions, materials, or waste. Grading and construction activities may involve limited transport, use, and disposal of hazardous materials such as fuel for construction equipment. However, construction activities are short-term and hazardous materials used during construction would be transported, used, and disposed of according to federal, State, and local health and safety requirements. Therefore, impacts related to the emission and/or handling of hazardous emissions or materials within one-quarter mile of an existing school would be **less than significant**.

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? No Impact

The project site is not identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The site does not appear on the environmental database report obtained for the Phase I ESA. There are three facilities listed in the database report within the various search distances specified by ASTM E 1527-21. These facilities are described in more detail in the Phase I ESA, which is located in **Appendix H** of this document. Due to the nature of the listings; distance; lack of violations, spills or leaks; investigations and/or clean-ups, these facilities have not created a recognized environmental condition to the project site (GeoTek 2024b). Therefore, the project is not located on a site which is included on a list of hazardous material sites and would not create a significant hazard to the public or environment. **No impact** is identified for this issue area.

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

The project site is not located within an airport land use plan, nor within two miles of a private airstrip or public airport. The closest airport is the McClellan-Palomar Airport in Carlsbad, approximately 11 miles southwest of the project site. The project is outside of the airport's influence areas. Therefore, **no impact** would occur related to proximity to airports.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Less than Significant Impact

As described in more detail in Threshold (a) of Section 4.20, Wildfire, a Wildfire Evacuation Study (WES) was prepared to evaluate the project's consistency with relevant emergency evacuation plans and emergency response plans. There is no existing evacuation plan for the area or pre-determined evacuation routes, therefore the project would not eliminate or interfere with any existing evacuation routes. The primary evacuation routes available to the future occupants of the project site that lead to the I-15 include Conway Drive, Cleveland Avenue, North Broadway, Rincon Avenue, Jesmond Dene Road, Country Club Lane, and Centre City Parkway (Dudek 2025b). In an evacuation or emergency scenario, adequate emergency access would be maintained. Even though roads adjacent and near to the project are not determined evacuation routes, the project would not result in road or lane closures, maintaining ingress and egress, and the roads could be used for emergency vehicle access. In the event of an emergency evacuation, law enforcement would control evacuations and determine the safest route for evacuees to utilize. Further, the available roadway capacity is sufficient to safely accommodate the number of evacuating vehicles within the relevant areas with and without the project development. The proposed project would not impact any roadway or staging areas that are identified in any emergency planning documents. Access to the project site would be via existing Conway Drive and Cleveland Avenue connected by proposed Street "A". Conway Drive and Cleveland Avenue are both existing code-compliant 32-foot wide (minimum), two-lane roads that connect with North Avenue to the north and east. The existing circulation network is in compliance with the existing code for street width and allows for the increased capacity, safety, and evacuation efficiency. Internal circulation and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles (Dudek 2025a). The WES demonstrated that evacuation times would be reasonable and would allow for safe evacuations to be conducted under all scenarios. Therefore, the project does not propose any development that would impair implementation or physically interfere with any adopted emergency response plan or evacuation plan. Furthermore, during plan review the Escondido Fire Department determined the proposed project provides sufficient on-site emergency access. Therefore, impacts would be **less than significant**.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? Less than Significant Impact

The project site is located in a developed portion of the City. The project site is bounded on the north and east by single-family residential. Beyond Conway Drive to the west and Cleveland Avenue to the south are more residential uses. Fire history data from CAL FIRE's Fire and Resource Assessment Program indicates wildfires have occurred within a five-mile vicinity of the project site; however, there have been no recorded wildfires on-site. The most recent wildfire in the project vicinity was the 2014 Cocos Fire, which burned approximately 1,995 acres. The largest wildfire in the project vicinity was the 1969 Moosa Fire, which burned approximately 6,944 acres (Dudek 2025a).

Implementation of the proposed project would result in a developed area with structures, and landscape vegetation. The project site is within a Very High Fire Hazard Severity Zone, in a Local Responsibility Area (LRA) as designated by CAL FIRE (2024). As described in more detail in Section 4.20 (Wildfire), because of this designation any future homes would be required to be built to the latest ignition-resistant building codes found in Chapter 7A of the California Building Code, and any additional restrictions or requirements adopted locally by the Escondido Fire Code and San Diego County Consolidated Fire Code (SDCCFC). The project design incorporates fire fuel management zones and fire-resistant and ignition-resistant construction methods. Measures such as ignition-resistant

construction features would alleviate increases in wildfire risks because they would make development less likely to ignite in the event of a fire and would promote avoidance of damage to life and property. Automatic interior residential fire sprinklers would also further reduce wildfire risk because in the event a building were to catch fire, the sprinklers would emit water which would assist in extinguishing the fire, opposed to relying on emergency response from firefighters to provide water to extinguish a building structure fire. Additionally, the proposed project, once developed, would provide each structure with defensible space that would reduce projected flame lengths to levels that would be manageable by firefighting resources for protecting the site's structures, especially given the ignition resistance of the structures and the planned ongoing maintenance of the entire site's landscaping (Dudek 2025a).

As part of the FPP, modeling and analysis was conducted to determine the appropriate size of fuel modification zones (FMZs). FMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other. The defensible space/fuel modification zones surrounding the structures would be consistent with Escondido Fire Department's Defensible Space Property Review Checklist and consist of up to 50 feet of irrigated, well-maintained landscape with fire-resistant plants (FMZ 1) and up to 50 feet of 50% thinning of dead and diseased vegetation within (FMZ 2). General description of the FMZs are included above in Section 2.0 Project Description, and more details are provided in the FPP (**Appendix M**).

The project site would not be able to meet the 100 foot of defensible space requirement on the periphery of all proposed project structures. All structures would be able to meet the Ember Resistant Zone, 0-5 feet from the structure. While Zone 1 and 2 are impaired on all sides of the project, the project benefits from off-site FMZ equivalencies on the east, south, and west sides, and would achieve 100 feet of abatement to the north through FMZ maintenance agreement/easement. The property owner for the northern parcel is the same as the project. It is important to note that the project does not have a wildland interface; the nearest wildland is approximately 1,200 feet to the east. The parcel to the north of the project could experience a vegetation fire, but the 100-foot FMZ achieved through easement/maintenance agreement and 6-foot-tall concrete masonry unit (CMU) block wall would provide sufficient fuels reduction and heat deflection to prevent the vegetation fire from contacting the project.

According to the FPP, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements provided in the FPP would reduce the project site's vulnerability to wildfire and help to limit the spread of fire from the project site to surrounding areas. Once the project is constructed, the on-site fire potential would be lower than its current condition due to conversion of areas of wildland fuels to managed landscapes, extensive fuel modification areas, improved accessibility to firefighting personnel and equipment, and new structures built to the latest ignition-resistant codes (Dudek 2025a). Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands and impacts would be **less than significant**. Additional wildfire analysis is provided in Section 4.20 Wildfire.

3.10 Hydrology and Water Quality

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
d) 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 run-off in a manner which would result in flooding on- or off-site?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) 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 create or contribute run-off which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off?			X	
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?			X	
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

A preliminary hydrology study was also prepared for the project by Excel Engineering (2025a) and is included in **Appendix I**. A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) was prepared for the project by Excel Engineering (2025b) and is included as **Appendix J**.

Existing Site Conditions

The existing parcel is currently an undeveloped lot in which stormwater naturally sheet flows northeast to southeast across the site (drainage management area [DMA]-1). The southeast corner of the lot contains a hill that causes the remaining on-site run-off (DMA-2) to sheet flow northwest to southeast to the southeast property corner.

The existing run-off from DMA-1 is collected at a headwall located at the southwest corner of the lot and is conveyed through an existing 18-inch reinforced concrete pipe (RCP) storm drain which connects to an existing curb inlet at the southeast side of Conway Drive (Point of Compliance [POC]-1). From the curb inlet, run-off is routed to the other side of Conway Drive via an existing 24-inch RCP

storm drain and is outlet at an existing headwall. The existing run-off from DMA-2 confluences at an existing curb cut at the southeast corner of Cleveland Avenue and continues to flow south via an existing brow ditch.

Off-site run-off is conveyed through the site from the adjacent parcels to the north and east. The off-site run-off sheet flows across the project site and confluences with on-site flows at POC-1 (Excel 2025a).

After drainage leaves the site, it flows to the south where the water travels through the Escondido sub-Hydrologic area southward to Escondido Creek. Once in Escondido Creek, flows continue until they reach the Pacific Ocean at San Elijo Lagoon (Excel 2025a).

Proposed Conditions

The project proposes to grade the property into 29 residential lots, along with driveways, sidewalks, roadways, porches and concrete brow ditches. The project also proposes two water quality lots (Lots A and B), a street lot and a utility lot. Structural Best Management Practices (BMPs) would be constructed to provide pollutant control and detention to reduce post-development flows to below pre-development levels. BMP-A, a biofiltration basin, would be located on Lot A in the southwestern area of the site along Conway Drive. BMP-B, a biofiltration basin, would be located in the southeast corner of the site on Lot B. BMP-C, a system of tree wells, would provide additional water quality treatment. The project includes grading, but the intent of the existing sloping of the lot would remain as is and drainage would still drain to the previously designed points of compliance. Fill soil would be brought in to level the site, and the finished building pad grades is a relatively flat plane through the site in the direction of the existing flows away from the building pads toward the proposed water quality treatment basins and tree wells. On-site storm drains would be installed with new biofiltration and water quality features to collect, treat, detain, and then discharge stormwater to the previously designed conveyance systems discharging south of the project (Excel 2025a).

Approximately 1.8 acres of existing off-site run-off area east of the lot would be routed to a new brow ditch constructed along the property line of the site and routed as bypass flow through the site via a private storm drain system. The on-site flows would confluence with this off-site bypass flow before being routed to the existing curb inlet on Conway Drive (POC-1) (Excel 2025a).

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Less than Significant Impact

The project site is primarily located in the Escondido Hydrologic sub-area (HSA) (904.62) and San Elijo HAS (904.61) of the Escondido Creek hydrologic area (904.6) of the Carlsbad watershed (904). Escondido Creek is identified on the State Water Resources Control Board (SWRCB) 303(d) impaired waters list for Benthic Community Effects, Bifenthrin, Cyfluthrin, Cypermethrin, dichlorodiphenyltrichloroethane (DDT), indicator malathion bacteria, iron, manganese, nitrogen, phosphate, phosphorous, pyrethroids, selenium, sulfates, total dissolved solids, toxicity and turbidity (Excel 2025b). San Elijo Lagoon is also included on the impaired waters list for eutrophic, indicator bacteria, oxygen, dissolved, phosphorus, sedimentation/siltation, toxicity, and turbidity. The Pacific Ocean Shoreline, San Elijo HAS, at Cardiff State Beach at Chart House parking is listed for indicator bacteria and trash, and the Pacific Ocean is listed for total coliform (Excel 2025a).

Construction of the project would involve ground-disturbing activities associated with grading and could result in sediment discharge in stormwater run-off. Additionally, construction activities would involve the use of oil, lubricants and other chemicals that could be discharged from leaks or accidental

spills. These discharges would have the potential to impact water quality in receiving water bodies. The project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) during construction and grading activities in accordance with the State Construction General Permit.

Additionally, the applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit for post-construction conditions. Regionally, this is achieved by preparing and implementing a SWQMP (**Appendix I**) based on the standards set forth in the City's BMP Design Manual (City of Escondido 2022). The Stormwater Design Manual provides the guidance necessary to comply with the City of Escondido Municipal Code (Chapter 22, Article 2) and the regional MS4 Permit (RWQCB San Diego Region Order R9-2013-0001 as amended). This order indicates that discharges from MS4s must not cause or contribute to the violation of water quality standards in any receiving water (RWQCB 2015, Page 18).

The SWQMP would require implementation of permanent water quality BMPs to ensure that water quality standards are met and that stormwater run-off from the project site does not result in a degradation of water quality in receiving water bodies. The preliminary SWQMP prepared for this project indicates the project would meet the requirements of the City's BMP Design Manual. As such, the potential impacts would be **less than significant**.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? No Impact

Implementation of the project would not use any groundwater. The geotechnical analysis (see Section 4.7) determined the project site is underlain by undocumented fill, older alluvium and granitic bedrock, which would create a barrier to groundwater infiltration (GeoTek 2024a). Groundwater was not encountered in any of the site explorations. The California Water Data Library database shows an on-site groundwater well near the western area of the north property line, with a depth to groundwater of approximately 28 feet. However, the cited database shows this record is "questionable" (GeoTek 2024a). Because the site is underlain by a relatively shallow layer of soil atop granitic rock, perched or seasonal groundwater may develop near the soil-bedrock contact. Groundwater is not anticipated to adversely affect the proposed development (GeoTek 2024a).

An infiltration evaluation including percolation testing was performed by GeoTek and the results show raw infiltration rates at the test locations ranging from negligible to about 0.4 inches per hour, indicating relatively poor infiltration rates. The threshold for relying on infiltration is 0.5 inches per hour (or greater) according to Attachment 1b of the SWQMP (Excel 2025a). Without feasible infiltration, the project site does not provide groundwater recharge and therefore implementation of the proposed project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, nor would it impede sustainable groundwater management of the basin. **No impact** related to groundwater supply or recharge would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, 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

Implementation of the proposed project would increase impervious surfaces but has been designed so that it would not substantially alter the existing drainage pattern of the site, resulting in substantial erosion or siltation on- or off-site.

The project would implement construction BMPs in compliance with the Construction General Permit. These BMPs focus on areas such as good site management/housekeeping, non-stormwater management, erosion control, sediment control, run-on and run-off control, inspection/maintenance/repair, rain event action plan, and monitoring/reporting requirements. Implementation of BMPs would further reduce the potential for erosion and siltation to enter project area waterways. Impacts would be **less than significant**.

Additionally, the applicant would be required to comply with the NPDES permit for post-construction addition of impervious surfaces. Regionally, this is achieved by preparing and implementing a SWQMP based on the standards set forth in the City's BMP Design Manual (City of Escondido 2022). The SWQMP would require implementation of permanent water quality BMPs to ensure that water quality standards are met and that stormwater run-off from the project site does not result in a degradation of water quality in receiving water bodies. The project includes construction of two permanent biofiltration basins to address all additional impervious areas created by the project. The preliminary SWQMP prepared for this project indicates the project would meet the requirements of the BMP Design Manual. As such, the potential impacts would be **less than significant**.

- d) **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 run-off in a manner which would result in flooding on- or off-site? Less than Significant Impact**

While the project would increase impervious surfaces, it would not alter the course of a stream or river. The project has been designed to accommodate 50-year storm floods and includes the use of three structural BMPs (two biofiltration basins with detention and tree wells). The project run-off would exit the project site at the same locations as the existing conditions.

Table 7 summarizes the hydrologic effects in terms of calculated peak flows from the site under both existing and proposed conditions. As shown, the proposed project would increase the 50-year peak flow discharge over existing conditions without BMPs. In order to decrease the flows at POC-1 and POC-2, the two detention biofiltration basins are designed to slow and detain run-off on-site, while tree wells provide additional water quality treatment. The detention basins increase the time of concentration at each POC, which decreases the post-developed 50-year run-off rate to below pre-developed rates, as shown in **Table 7**. As a result, the project (with detention BMPs) would not increase the 50-year peak flow discharge. Therefore, the project would not alter existing drainage patterns of the site area in a manner that would result in a substantial increase to the rate or amount of surface run-off in a manner which would result in flooding on- or off-site. Impacts would be **less than significant**.

Table 7. Summary of Hydrology Analysis

	Area (acres)	Q50 (cubic feet per second)
POC-1		
Existing Conditions	20.02	23.97
Developed Condition Before BMPs	20.08	25.80
Developed Condition with BMPs	20.08	22.10

POC- 2		
Existing Conditions	1.12	1.96
Developed Condition Before BMPs	1.03	2.09
Developed Condition with BMPs	1.03	1.53

Source: Excel Engineering 2025b (Appendix J)

- e) **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 run-off water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off? Less than Significant Impact**

While the project would increase impervious surfaces, it would not alter the course of a stream or river. The project has been designed to accommodate 50-year storm floods and proposes a comprehensive stormwater management plan that includes the use of two detention biofiltration basins (BMP-A and BMP-B) and tree wells (BMP-C) for pollutant control. Construction of these features is proposed within the development footprint for the project, so an expansion of existing facilities would not be required to serve the project. Therefore, the project would not create or contribute run-off water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off. Impacts would be **less than significant**.

- f) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows? Less than Significant Impact**

Implementation of the proposed project would increase impervious surfaces but has been designed so that it would not substantially alter the existing drainage pattern of the site. The project includes construction of two detention biofiltration basins (BMP-A and BMP-B) and tree wells (BMP-C) for pollutant control to address hydrologic, detention, and water quality needs of the site to ensure that the drainage pattern would remain largely the same. **Table 7** above summarizes the hydrologic effects in terms of calculated peak flows from the site under both existing and proposed conditions. As shown, the proposed project (with detention BMPs) would not increase the 50-year peak flow discharge. Therefore, the 50-year post-development peak site discharge would be consistent with existing conditions. Implementation of the proposed project would not increase the rate or quantities of run-off beyond the pre-development conditions. Therefore, the project would not alter existing drainage patterns of the site area in a manner that would impede or redirect flood flows. Impacts would be **less than significant**.

- g) **In flood hazards, tsunami or seiche zones, risk release of pollutants due to project inundation? No Impact**

The project site is not located within a Tsunami Evacuation Area or FEMA Flood Zone; therefore, damage due to tsunamis and flooding is considered low. The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel Number 06073C0812G was reviewed to determine if the project site was located within an area designated as a Flood Hazard Zone (FEMA 2012). The property is within Zone X (Area of Minimal Flood Hazard) and is not located within a 100-year flood hazard area. Also, per the City's General Plan EIR, the project site is not identified as being in a Flood

Hazard Area (Figure 4.9-3) or within a Dam Inundation Area (Figure 4.9-2) (City of Escondido 2012a). Therefore, implementation of the proposed project would not risk release of pollutants due to project inundation in a flood hazard area.

Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The project site is not located immediately adjacent to any lakes or confined bodies of water; therefore, the potential for a seiche to affect the property is considered low. Therefore, **no impact** is identified for this issue area.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? Less than Significant Impact

The applicant would be required to comply with the NPDES permit. Regionally, this is achieved by preparing and implementing a SWQMP based on the standards set forth in the City's BMP Design Manual (City of Escondido 2022). The SWQMP would require implementation of water quality BMPs to ensure that water quality standards are met and that stormwater run-off from construction areas do not result in a degradation of water quality in receiving water bodies. The preliminary SWQMP prepared for this project indicates the project would meet the requirements of the BMP Design Manual. Additionally, the project would not use any groundwater or affect direct infiltration and saturation. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As such, the potential impacts would be **less than significant**.

3.11 Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect?			X	

a) Physically divide an established community? No Impact

The project site is currently vacant. The site is surrounded by single-family residential neighborhoods. It is bounded on the west by Conway Drive, on the south by Cleveland Avenue and existing residential to the north and east. Development of the project site would not result in a physical division of an established community. The project would construct a side walk along the project frontages on Conway Drive and Cleveland Avenue. This would enhance pedestrian movement in the project area. The project would not physically divide an established community, and **no impact** is identified for this issue area.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect? Less than Significant Impact

The project site has General Plan and Zoning designations as follows:

- General Plan Designation: E2 (Estate II)
- Zoning: RE-20 (Residential Estates)

The project applicant is requesting approval of a Tentative Map to subdivide a 10.38-acre site into 29 residential lots, one public street lots and two water quality lots. Under the maximum permitted density, the project would be allowed to construct up to 21 units. A density bonus is requested to allow for a total of 29 units. Three of the units would be affordable for very-low-income households and the remaining 26 units would be market rate.

State law allows for projects that provide affordable housing units to increase the density above what would otherwise be allowed by a city's General Plan and Zoning Code. **Table 8** presents the density bonus calculation. As shown in **Table 8**, the project would provide three affordable units at the low-income level. Based on the provision of three low-income affordable units, the proposed project would receive density bonus of five dwelling units. Therefore, the proposed project is consistent with the General Plan and Zoning designations with the density bonus.

Table 8. Density Bonus Calculation

Density Bonus Calculation For Very-Low Income		
		Round Up
Maximum Permitted Density	2 du/ac	
Property Size (Acres)	10.380	
Number of Units at Maximum Permitted Density	20.760	21
Units Affordable to Very-Low Income Households	2.284	3
Density Bonus Units (35%)	7.350	8
Total project Units with 35% Density Bonus		
Base Units		21
Allowed Density Bonus Units		8

Density Bonus Calculation For Very-Low Income	
Allowed Total Units	29
Total Affordable Units for Very-Low Income Households	3
Total Market Rate Units	29

Note: du/ac = dwelling unit per acre

As discussed in Section 4.3, Air Quality, the project would be consistent with SANDAG population projections meaning it would also be consistent with the San Diego Air Basin's air quality plans including the Regional Air Quality Strategy (RAQS) and/or State Implementation Plan (SIP). The project would also comply with all of San Diego Air Pollution Control District's air quality requirements. As discussed in Section 4.4 Biological Resources, the project would be consistent with the MHCP and the draft Escondido MHCP Sub-area Plan. As discussed in Section 4.17, Transportation, since the project would generate below 500 trips per day, a Local Mobility Analysis was not required for the project. Therefore, implementation of the proposed project would not conflict with the City's General Plan's policies related to level of service. Therefore, the project would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect. Impacts would be **less than significant**.

3.12 Mineral Resources

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

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

The City of Escondido is in the Western San Diego County Production-Consumption (P-C) Zone according to the California Mineral Land Classification System (City of Escondido 2012a). However, there are no known mineral resources on the project site of value to the region or to residents of the state. The project site is located in a developed part of the City and is not currently, nor previously, used for the extraction of mineral resources. Therefore, development of the project site would not

result in adverse impacts due to a significant depletion or loss of availability of mineral resources of value to the region and residents of the state. Therefore, **no impact** would occur.

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? No Impact

The project site has General Plan and Zoning designations for residential uses. Furthermore, the City's General Plan has not identified mineral resources on the project site or within the vicinity of the project site. Therefore, **no impact** is associated with the loss of availability of a known mineral resource delineated on a local general plan, specific plan, or other land use plan would occur.

3.13 Noise

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

Noise impacts can occur from construction operations and long-term operations of a project, which as a single-family residential development consists primarily of transportation related noise. Potential noise impacts from these sources were analyzed in the report, Cleveland 29 Residential Development Escondido CA, prepared by LDN Consulting (LDN), dated November 14, 2025, and included in **Appendix K** (LDN 2025b). Noise is regulated by the City of Escondido General Plan and Section 17 of the Escondido Municipal Code.

Construction Noise

Sections 17-234 and 17-240 of the City of Escondido Municipal Code regulate construction noise. Any piece of construction equipment or any combination of construction equipment cannot be operated so as to cause an average noise level in excess of 75 dBA Leq during the allowable hours of operation. Per City regulations, construction equipment can only be operated from 7:00 AM to 6:00 PM, Monday through Friday, and on Saturday from 9:00 AM to 5:00 PM. Construction equipment cannot be operated on Sundays or holidays. Operation of any construction equipment during non-allowable hours is permitted only by a variance from the City Manager.

On-site Transportation Noise (Land Use Compatibility)

The goal of the Community Protection Element of the City General Plan is to minimize the impact of noise on the community by identifying existing and potential noise sources and providing the policies and standards needed to keep noise from reducing the quality of life in the City. The Community Protection Element establishes guidelines to evaluate the compatibility of land uses and noise exposure levels. A “Normally Acceptable” land use indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference. Evaluation of land use that falls into the “Conditionally Acceptable” noise environment should have an acoustical study prepared. The acoustical study should include, with consideration of the type of noise source, the sensitivity of the noise receptor, and the degree to which the noise source may interfere with speech, sleep, or other activities characteristic of the land use.

The Community Protection Element also states that the exterior standard should not normally be applied to balconies or patios associated with residential uses. Impacts would be significant if the project would expose new development to noise levels in excess of the Noise Compatibility Standards. For single-family uses, the normally acceptable exterior noise compatibility standard is 60 Community Noise Equivalent Level (CNEL).

The Community Protection Element of the City General Plan also has a Noise Policy 5.4 that requires noise attenuation for new noise-sensitive uses. This includes residential, daycare facilities, schools, churches, transient lodging, hotels, motels, hospitals, health care facilities, and libraries if the projected interior noise standard of 45 dBA CNEL is exceeded.

Operational Noise (Stationary Noise)

According to Escondido Municipal Code, Section 17-229 and 17-240 Article 12, average hourly noise levels shall not exceed 50 dBA LEQ between the hours of 7:00 AM and 10:00 PM and 45 dBA Leq between the hours of 10:00 PM and 7:00 AM at the boundary of a property in residential zones. These noise limits would apply to noise generated by HVAC equipment.

Vibration

Noise Policy 5.5 of the Community Protection Element requires that construction projects and new development ensure acceptable vibration levels at nearby noise-sensitive land uses based on the United States Department of Transportation Federal Transit Administration (FTA) criteria. These criteria are outlined in the Escondido General Plan Update and shown below in **Table 9** per the City of Escondido Groundborne Vibration Impact Criteria. The General Plan EIR states that the category of infrequent events is applicable to construction activities. As shown, the FTA criterion for infrequent vibration induced annoyance is 80 Vibration Velocity (VdB) for residential uses.

Table 9. Groundborne Vibration and Noise Impact Criteria (Human Annoyance)

	Groundborne Vibration Impact Levels (VdB re 1 microinch/second)			Groundborne Noise Impact Levels (dB re 20 micropascals)		
	Frequent Events ⁽¹⁾	Occasional Events ⁽²⁾	Infrequent Events ⁽³⁾	Frequent Events ⁽¹⁾	Occasional Events ⁽²⁾	Infrequent Events ⁽³⁾
Category 1: Buildings where low ambient vibration is essential for interior operations.	65 VdB ⁽⁴⁾	65 VdB ⁽⁴⁾	65 VdB ⁽⁴⁾	N/A ⁽⁴⁾	N/A ⁽⁴⁾	N/A ⁽⁴⁾
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

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

Notes:

- (1) "Frequent Events" are defined as more than 70 vibration events per day. Most rapid transit projects fall into this category.
- (2) "Occasional Events" are defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
- (3) "Infrequent Events" are defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
- (4) This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
- (5) Vibration-sensitive equipment is not sensitive to groundborne noise.

In addition to the vibration annoyance standards presented above, the FTA also applies the following standards for construction vibration damage. As shown in Table 10, structural damage is possible for typical residential construction when the peak particle velocity (PPV) exceeds 0.2 inch per second (in/sec). This criterion is the threshold at which there is a risk of damage to normal dwellings.

Table 10. Groundborne Vibration Impact Criteria (Structural Damage)

Building Category	PPV (in/sec)	VdB
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

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

Note: RMS = Root Mean Square (RMS) velocity calculated from vibration level (VdB) using the reference of one microinch/second.

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

Construction Noise

Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment including haul trucks, water trucks, graders, dozers, loaders, and scrapers can reach relatively high levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours. Due to bedrock condition, the project may also require blasting and rock crushing.

The U.S. Environmental Protection Agency (U.S. EPA) and the U.S. Department of Transportation (U.S. DOT) have compiled data regarding the noise generating characteristics of specific types of construction equipment. Noise levels generated by heavy construction equipment can range from 60 dBA to in excess of 100 dBA when measured at 50 feet. However, these noise levels diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 75 dBA measured at 50 feet from the noise source to the receptor would be reduced to 69 dBA at 100 feet from the source to the receptor and reduced to 63 dBA at 200 feet from the source.

Based on empirical data and the amount of equipment needed, worst-case noise impacts from construction equipment would occur during the grading operations. In order to determine the worst-case scenario for the grading activities, all the equipment was placed in a common location, which is not physically possible. As shown in **Table 11**, even if all the equipment were placed together, the cumulative noise levels at 50 feet would be 80.1 dBA. Based upon the proposed site plan, construction activities would average more than 90 feet away from the adjacent property lines. As shown, noise levels would attenuate 5.1 dBA at a distance of 90 feet from the point source noise. At average distances over 90 feet, the construction activities are not expected to exceed the City's 75-dBA standard and would not require any mitigation measures (LDN 2025b).

Table 11. Construction Noise Levels

Equipment Type	Quantity Used	Source @ 50 Feet (dBA)	Cumulative Noise Level @ 50 Feet (dBA)
Dozer D8 Cat	1	72	72.0
Tractor/Backhoe	1	74	74.0
Loader/Grader	1	73	73.0
Water Truck	1	70	70.0
Paver/Blade	1	75	75.0
Cumulative Level			80.1
Distance to Sensitive Uses (feet)			90
Noise Reduction due to Distance			-5.1
Property Line Noise Level			75.0

Source: LDN 2025b.

Additionally, the project would be required to comply with Section 17.234 and 17.240 of the Escondido Municipal Code that limits operation of construction equipment to between 7:00 AM and 6:00 PM Monday through Friday and on Saturday from 9:00 AM to 5:00 PM. Construction equipment cannot be operated on Sundays or holidays, without a variance from the City Manager. These limits to construction hours are included as project design features listed in **Table 1**, along with the following standard best management practices:

- Staging areas should be placed as far as possible from sensitive receptors.
- Place stationary equipment in locations that would have a lesser noise impact on nearby sensitive receptors.
- Turn off equipment when not in use.
- Limit the use of enunciators or public address systems, except for emergency notifications.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured to prevent rattling and banging.
- Schedule work to avoid simultaneous construction activities that both generate high noise levels.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.

Rock Drill Noise

Areas of the project site that require deeper cuts and where the native material is not easily graded may require blasting and the use of a rock drill. The rock drill would be moved around the site on an as-needed basis dependent upon the site characteristics. The use of a rock drill would occur independently of all other proposed equipment. The drilling and blasting activities would occur in one area then the grading equipment would relocate or remove the debris. To determine the worst-case noise levels from the drilling operations the noise level from the rock drill would be 85.0 dBA at 50 feet. Utilizing a 6 dBA reduction per doubling of distance, at an average distance of 160 feet from any property line, the noise levels would comply with the 75 dBA standard as shown in **Table 12**.

Table 12. Construction Noise Levels from Rock Drill

Construction Equipment	Quantity	Source Level @ 50 Feet (dBA)	Duty Cycle (Hours/Day)	Noise Level @ 50 Feet (dBA)
Rock Drill	1	85	8	85.0
Noise Reduction Needed to Comply				-10.0
Distance Required to Reduce Noise Levels				160
Nearest Property Line Noise Level				74.9

Source: LDN 2025b.

Rock drilling and blasting would occur on an as-needed basis on-site and could be located as close as 20 feet from an occupied noise-sensitive land use. Therefore, noise levels could range from 75 dBA to 93 dBA. In the event that the rock drill is staged within 160 feet of any occupied noise-sensitive land use, there is a potential for a significant noise impact (**Impact N-1**). Implementation of mitigation measure **MM-N-1**, identified below, would reduce the potential impact to below a level of significance.

MM-N-1 If rock drill staging occurs within 160 feet of any occupied noise-sensitive land uses, sound levels could exceed 75 dBA at property lines. A noise mitigation plan based upon the location of the construction equipment, topography and construction schedule shall be prepared by an acoustical consultant. The noise mitigation plan shall identify measures to reduce sound levels to below 75 dBA. Such measures could include a temporary 12-foot noise barrier along any property line where the impacts could occur. The proposed noise barrier shall be of solid non-gapping material to adequately reduce construction noise levels below the noise threshold of 75 dBA at the property lines. The noise mitigation plan shall determine the final height and location of a temporary barrier if one is necessary. The mitigation plan may also identify location and timing restrictions on drilling equipment usage. The mitigation plan shall be submitted to the City for review and approval prior to initiation of rock drill staging activities within 160 feet of any occupied noise-sensitive land use.

Blasting Noise

Construction-related blasting would not result in a significant noise impact because blasting events are instantaneous and occur infrequently, resulting in very short-term noise exposure. In addition, all

blasting activities would comply with the City of Escondido's Noise Ordinance and applicable blasting protocols, which include requirements for advance notification, use of controlled blasting techniques, and adherence to established maximum noise and vibration limits. Therefore, blasting noise would be minimized to the extent feasible and would not result in a significant impact.

Rock Crushing Noise

The use of a temporary rock crusher may be required for the project. Based on empirical data collected from a similar rock crusher, noise levels ranged between 70-72 dBA at 100 feet (LDN 2025b). A worst-case noise level of 72 dBA at 100 feet would be utilized for the analysis. As can be seen in **Table 13**, when the rock crusher is located a minimum of 75 feet from any residential property line, the anticipated noise levels would be below the City's 75 dBA Leq construction noise standard

Table 13. Rock Crushing Noise Levels

Equipment Type	Quantity Used	Source @ 100 Feet (dBA)	Duty Cycle (hrs/day)	Cumulative Noise Level @ 100 Feet (dBA)
Thunderbird Hazemag #CP300	1	72	8	72.0
Distance to Sensitive Use				75
Noise Increase due to Distance				+2.5
Property Line Noise Level				74.5

Source: LDN 2025b.

In the event that rock crushing is located within 75 feet of the adjacent single-family residential uses, then a significant noise impact could occur (**Impact N-2**).

MM-N-2 Prior to issuance of a Grading Permit for a rock crusher, the project applicant or contractor shall provide the final location and rock crusher type to the Planning Division. If the rock crusher is shown to be located within 75 feet of a single-family residential use without shielding, an acoustical engineer shall prepare a noise assessment to determine whether noise levels would be above the applied thresholds of 60 dBA at any existing single-family residential use and 65 dBA for multi-family. This requirement shall be noted on the grading plans.

If the rock crushing noise assessment determines noise levels at the affected property lines would exceed the standards, the acoustical engineer shall develop a mitigation plan to reduce noise levels to 60 dBA at any existing single-family use. Mitigation may include sound barriers, sound absorbing materials, and/or operational limits on the crusher equipment's usage. The mitigation plan shall be submitted to the Planning Division and implemented by the contractor.

In summary, there is a potential for construction-related noise impacts from rock drilling, blasting and rock crushing, depending on the location of equipment in relation to adjacent, off-site residential uses. Implementation of mitigation measures **MM-N-1** and **MM-N-2** would reduce these potential impacts to below a level of significance.

Operational Noise

This section addresses the operational noise associated with the project to determine if it would result in a permanent increase in ambient noise levels in the vicinity of the project in excess of applicable noise standards. Operational noise associated with the project would primarily include on-site transportation noise levels and project related off-site transportation noise.

Existing Noise Environment

The project site is surrounded by existing residential uses and public roads. The existing noise levels in the project area consist primarily of traffic along Cleveland Avenue and Conway Drive. An ambient noise measurement was taken in the southwest corner of the project site to establish a baseline for the vehicle noise from area roadways. The measurements were free of obstruction and had a direct line of sight to the roadways. The overall sound level was found to be 49.9 dBA Leq (LDN 2025b).

On-site Transportation Related Noise Levels

To determine the future noise environment and impact potentials the roadway segment projected noise levels were calculated using the methods in the Highway Noise Model public by the Federal Highway Administration (FHWA 1978). The FHWA Model uses the traffic volume, vehicle mix, speed, and roadway geometry to compute the equivalent noise level. The peak hour traffic volumes range between 6-12% of the average daily traffic (ADT) and 10% is generally acceptable for noise modeling. Table 4-4 of the noise report (LDN 2025b) presents the future traffic parameters that were assumed in the analysis. Based upon the noise modeling, it was determined that the cumulative noise levels from Cleveland Avenue and Conway Drive would be 56.4 dBA CNEL, which would be below the City's exterior noise level goal of 60 dBA CNEL. Therefore, on-site transportation related noise levels would be **less than significant**.

Project Related Off-site Transportation Related Exterior Noise Levels

To determine if direct or cumulative off-site noise level increases associated with the development of the proposed project would create noise impacts, the traffic volumes for the existing conditions were compared with the traffic volume increase of existing plus the proposed project. The project is estimated to generate 290 daily trips with peak hour volumes of 29 trips (LLG 2025). The existing average daily trips (ADT) on Cleveland Avenue and Conway Drive are 400 ADT according to the SANDAG Series ABM2+/2021 RP, Existing Year 2025. Typically, it requires a project to double (or add 100%) the traffic volumes to have a direct impact of 3 dBA CNEL or to be a major contributor to the cumulative traffic volumes. The project would contribute up to 290 trips. It should be noted that 210 trips would have been assumed based upon the base density. The project would only be adding 80 trips, for a total of 290 trips. When these 290 trips are added to these roadways, this represents a 72.5% increase and would be below the doubling required to result in an off-site transportation noise impact. Therefore, impacts are **less than significant**.

a) Generation of excessive groundborne vibration or groundborne noise levels? Less Than Significant Impact

The nearest vibration-sensitive uses are the residences located 50 feet or more from the proposed construction. **Table 14** lists the average vibration levels that would be experienced at the nearest vibration-sensitive land uses from the temporary construction activities. As discussed above, the FTA criterion for vibration induced structural damage is 0.20 in/sec for the PPV. As shown in **Table 14**, project construction activities would result in PPV levels below the FTA's criteria for vibration induced structural damage. Therefore, project construction activities would not result in vibration induced

structural damage to residential buildings near the construction areas. The FTA criterion for infrequent vibration induced annoyance is 80 VdB for residential uses. As shown in **Table 14**, construction activities would generate levels of vibration that would not exceed the FTA criteria for nuisance for nearby residential uses. Therefore, vibration impacts would be **less than significant**.

Table 14. Vibration Levels from Construction Activities (Residential Receptors)

Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate RMS Velocity at 25 Feet (in/sec)	Approximate Velocity Level at 50 Feet (VdB)	Approximate RMS Velocity at 50 Feet (in/sec)
Small bulldozer	58	0.003	49.0	0.0315
Jackhammer	79	0.035	70.0	0.0124
Loaded trucks	86	0.076	77.0	0.0269
Large bulldozer	87	0.089	78.0	0.0315
FTA Criteria			80	0.2
Significant Impact?			No	No

Source: LDN 2025b.

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

The project site is not located within an airport land use plan, nor within two miles of a private airstrip or public airport. The closest airport is the McClellan-Palomar Airport in Carlsbad, approximately 11 miles southwest of the project site. The project is outside of the airport's influence areas and outside of the 60 dB CNEL noise contours of the airport (County of San Diego 2021). Therefore, because the project site is located outside of the existing and future 60 dB CNEL noise contours of the airport, the project would not expose people residing or working in the project area to excessive noise levels. **No impact** is identified.

3.14 Population and Housing

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

The American Community Survey, prepared by the U.S. Census Bureau (USCB), provides demographic data for cities, such as Escondido. The Census defines a "household" as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing living quarters. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households.

The USCB estimated that Escondido has 51,288 households with an average household size of 2.89 persons per household in 2023. The total population of Escondido was estimated to be 148,847 as of July 1, 2024 (USCB 2024).

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? No Impact

The project site is currently vacant. The project proposes 29 single-family homes. Based on the population rate of 2.89 persons per dwelling unit (USCB 2023), the proposed project would contribute to population growth to the area and would add an estimated 84 people to the area. The project site is surrounded by single-family residential. The proposed project, along with the proposed density bonus pursuant to State law, is consistent with the General Plan and Zoning designations for the site so this minor population increase would have been considered in the City's long-term planning and forecasting.

All infrastructure improvements for the project have been sized only to serve the full buildout of the project and no upsizing of utilities or infrastructure is proposed. Therefore, the proposed project would not induce substantial population growth in the area directly or indirectly. **No impact** is identified for this issue area.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? No Impact.

The project site is vacant and does not support any existing residential units. Therefore, the project would not result in the need to construct replacement housing. **No impact** is identified for this issue area.

3.15 Public Services

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

The proposed project may be conditioned to annex into a City of Escondido Community Facilities District (CFD) that provides a funding source for ongoing public services, including police, fire, and infrastructure maintenance. CFD No. 2020-1 (Public Services), which previously served this purpose, was repealed in 2024; the City may require annexation into a successor CFD or other financing mechanism.

- a) Fire protection? Less than Significant Impact

Fire protection services in the City are provided by the Escondido Fire Department (EFD). The EFD has seven stations throughout the City. Emergency response for the project would be provided by EFD Fire Station #7, located at 1220 North Ash Street. Fire Station #7 is staffed by one Fire Captain, one Engineer, one Firefighter Paramedic and two Paramedics. Station #7's apparatus includes one Type 1 Engine and one rescue ambulance. Station #7 is approximately 2.3 miles from the entrance into the development with a calculated travel time of approximately 4 minute and 34 seconds. Therefore, EFD can respond to the project site within the City's adopted performance goal of responding to emergency calls with a first- due unit within 7 minutes and 30 minutes (5:00 minutes travel time), 90% of the time (Dudek 2025a).

There are additional firefighting resources within the vicinity of the project site, including EFD Station #3, located at 1808 North Nutmeg Street, Escondido and EFD Station #2, located at 421 North Midway Drive, Escondido. EFD Station 3 is approximately 2.7 miles from the project site with a calculated travel time of 5 minutes and 14 seconds, and EFD Station #2 is approximately 3.6 miles from the project site with a calculated travel time of 6 minutes and 46 seconds.

According to the FPP prepared for the proposed project, the development of 29 single-family homes would potentially generate up to 13.35 calls per year (roughly 1.1 calls per month or 0.025 call per day), most of which would be expected to be medical-related calls, consistent with typical emergency call statistics. Service level requirements are not expected to be significantly impacted with the increase of approximately 1.1 calls per month for the local fire response system. For example, EFD currently responds to roughly 52 call per day (18,979 calls per year, 1,582 calls per month, or 365 calls per week) in its primary service area. For reference, a Fire Station that responds to 5 calls per day in an urban setting is considered average and 10 calls per day is considered busy. Therefore, the project is not expected to cause a decline in the emergency response times (Dudek 2025a) nor would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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 services. Impacts are **less than significant**.

b) Police? Less than Significant Impact

Law enforcement services in the City are provided by the Escondido Police Department. The Police Station Headquarters are located at 1163 Centre City Parkway, approximately 2.5 miles south of the project site. However, police officers are routinely on patrol throughout the City, therefore, response times can vary. The proposed project would not change the City's ability to provide service.

Additionally, in consultation with Police Department staff during the planning entitlement process, the additional residential units and residents associated with the proposed project represent such a small fraction of the overall service area that Escondido Police can serve the proposed project without any change in level of service or need for additional equipment or personnel. Furthermore, the proposed project has been reviewed for site access, lighting, and other community policing design criteria and determined to meet Police Department requirements. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities to maintain police services. Impacts would be **less than significant**.

c) Schools? Less than Significant Impact

The project site is located within the service boundary of the Escondido Unified School District (EUSD) for grades TK-8. Escondido Union High School District (EUHSD) provides public high school education for the project site. Students from the proposed project would likely be within the attendance boundary of Reidy Creek Elementary School, Rincon Middle School and Escondido High School.

In accordance with standard conditions of approval, the project applicant would be required to pay development impact fees to both EUSD and EUHSD for residential development at the time building permits are issued per Senate Bill (SB) 50. SB 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Such payment shall provide "full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities" (Government Code

Section 65995(h)). As such, with contribution of required development fees, impacts to schools would be **less than significant**.

Payment of these fees would offset impacts from the increased demand for school services associated with the proposed project by providing an adequate financial base to construct and equip new and existing schools as needed. Therefore, both EUSD and EUHSD would be able to provide adequate school facilities for the projected student residents of the proposed project, and payment of development impact fees would ensure that impacts would be less than significant. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities to maintain fire services. Impacts would be **less than significant**.

d) Parks? Less than Significant Impact

The City has 29 parks and recreational facilities including open space areas, golf courses, community parks and pocket parks (City of Escondido 2012a). The closest existing park to the project site is Westside Park approximately one mile north at 333 S. Spruce Street. Westside Park includes children's play equipment, picnic areas, a basketball court, restrooms, and a covered picnic area.

As discussed in Section 4.14, Population and Housing, the proposed project would contribute to population growth to the area and would add an estimated 84 people to the area, slightly increasing demand for park facilities.

Per the City of Escondido Municipal Code Section 6-460.5, the City collects park fees for each residential unit constructed. The City's park fees change periodically, however, according to the Fee Guide for Development Projects, dated March 4, 2025, the park fee for single-family dwellings is \$6,986.29/unit (City of Escondido 2025a). Payment of the park fees offsets impacts from additional demand placed on park facilities; therefore, impacts would be **less than significant**.

e) Other public facilities? Less than Significant Impact

The analysis within sections 4.15(a) through 4.15(d) concluded that the project would have a less than significant impact for police protection, fire protection, schools, and parks. The proposed project would place additional demands on other public facilities. These facilities range from the City's library to streets, storm drains, and other public facilities such as city hall, etc. When a residential development project is newly constructed in an established city, often that project would rely on, and impact, established infrastructure. In those situations, the impacts would be often offset by payment of development impact fees. That is the case in the City of Escondido. Pursuant to Chapter 6, Article 17, Section 6-438(a) of the City's Municipal Code, "Development fees shall be imposed as a condition of approval of a development project. No tentative or final subdivision map, parcel map, grading permit, building permit, final inspection or certificate of occupancy shall be approved unless the provisions of this section have been fulfilled."

The City has prepared the Fee Guide for Development Projects, dated March 4, 2025, which outlines the development fees required of new projects. Development fees include the following fees, along with the stated purpose of the fee (City of Escondido 2025a):

- **Traffic Fee (Local)** – "To ensure that the traffic and transportation facility standards established by the City are met with respect to the additional needs created by such development."

- **Public Facility Fee** – “To ensure that public facility standards established by the City are met with respect to the additional needs created by such development. (For public facilities such as Police, Fire, Library, etc.).”
- **Park Fee** – “To ensure that the park land and recreational facility standards established by the City are met with respect to the additional needs created by such development.”
- **Drainage Facilities Fee** – “To ensure that storm water drainage facilities meet the requirements established by the City's Drainage Master Plan.”
- **Infrastructure Deposit Fee** – “To cover development's forecasted fair share costs of new infrastructure related to the impacts created by such development.”
- **Traffic Fee Regional (RTCIP)** – “To ensure local agency participation in regional circulation improvements to allow quality of life standards to be achieved and allow new development to proceed.”
- **San Diego County Water Authority (SDCWA) Capacity Charge** – “Pass-thru fee to the SDCWA to finance capital improvements.”

Payment of the fees, which are included as a condition of approval, would reduce impacts on public services to **less than significant**.

3.16 Recreation

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

- 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**

The City has 29 parks and recreational facilities including open space areas, golf courses, community parks and pocket parks (City of Escondido 2012a). The closest existing park to the project site is

Jesmond Dene Park approximately 0.5 miles southwest at 2401 N. Broadway. Jesmond Dene Park includes lighted ballfields, barbeques, fitness course, picnic tables, a recreation building, and restrooms.

As discussed in Section 4.14, Population and Housing, the proposed project would contribute to population growth to the area and would add an estimated 84 people to the area, slightly increasing demand for park facilities.

Per the City of Escondido Municipal Code Section 6-460.5, the City collects park fees for each residential unit constructed. The City's park fees change periodically, however, according to the Fee Guide for Development Projects, dated March 4, 2025, the park fee for single-family dwellings is \$6,986.29/unit (City of Escondido 2025a). Payment of the park fees offset the increase in demand of parks and recreational facilities generated by the proposed project, such that existing facilities would not substantially deteriorate. Impacts to existing neighborhood and regional parks would be **less than significant**.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**
No Impact

The project proposes a 29-lot residential subdivision. The proposed project is not of sufficient size to require, and does not propose, to construct new park facilities, or expand existing park facilities, located outside of the project site. **No impact** is identified for this issue area.

3.17 Transportation

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?			X	

The City of Escondido Transportation Impact Analysis Guidelines (TIAG) were adopted on April 21, 2021 (City of Escondido 2021b). This document sets out the methodology for conducting a Local Mobility Analysis (LMA) and VMT analysis and defines the significant thresholds to determine if a VMT and/or LMA is required as follows.

- **For VMT:** Projects generating 200 or fewer net new daily vehicle trips may be presumed to have a less-than-significant VMT impact, absent substantial evidence to the contrary.
- **For LMA:** Projects generating 500 or fewer average daily trips (ADT) may be considered by the City staff for an LMA waiver only where the affected segments and intersections operate at LOS C or better.

A Scoping Agreement for Transportation Studies was prepared for the project by LLG, and is included as **Appendix L** of this document.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? Less than Significant Impact

There are no existing pedestrian or dedicated bicycle facilities along the project frontage. There is a sidewalk on the south side of Cleveland Avenue and on the west side of Conway Drive. As part of the project, the applicant would install sidewalks along the project frontage on both Cleveland Avenue and Conway Drive. The construction of these sidewalks would add pedestrian connectivity in the project area and would also connect to the internal pedestrian circulation network planned within the project development.

The closest transit stop to the project site is a North County Transit District bus stop near the intersection of Country Club Lane and Iris Lane (Route 358/359) located approximately one mile from the project site. The project does not have the potential to impact this bus stop.

The City's General Plan Chapter III. Mobility and Infrastructure Element includes "Goal 1", and numerous related policies, to provide "An accessible, safe, convenient, and integrated multimodal network that connects all users and moves goods and people within the community and region efficiently." The proposed project is consistent with that goal by providing sidewalks that would enhance pedestrian movement in the project vicinity.

In summary, the project is considered a "small project" and screened out of an LMA because of the low number of vehicle trips generated (LLG 2025). The proposed project is consistent with the land use and zoning designations and with state and local density bonus laws. Therefore, the proposed project is consistent with the adopted plans and policies pertaining to the entire circulation system. Impacts would be **less than significant**.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision? Less than Significant Impact

Vehicle Miles Traveled

Section 15064.3(b) of the CEQA Guidelines provide criteria for analyzing transportation impacts for land use projects and transportation projects. The City produced their TIAG to provide guidance on the requirements to evaluate transportation impact for projects in the City. These guidelines implement the requirements of SB 743 with respect to the City. The TIAG established a minimum ADT threshold of 200 ADT for requiring VMT analyses.

The project proposes 29 units. Three units are affordable units and hence not subject to VMT analysis. A total of 21 residential units are allowed at this project site by the City General Plan. After subjecting the 21 allowed residential units plus the three affordable units, 5 units are subject to VMT (29 total units – 3 affordable units – 21 allowable units = 5 units). The remaining five market rate units would generate 50 ADT (10 ADT per unit), which would fall under the 200 ADT screening threshold for requiring a VMT analysis. As such, the City has determined that a VMT analysis is not warranted for this project. Implementation of the project would not conflict with or be inconsistent with CEQA Guidelines section 15064.3(b). Impacts would be **less than significant**.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Less than Significant Impact

The proposed project does not include any roadway improvements or cause any turning movements that would create hazardous conditions. Two access points are proposed: one on Conway Drive and one on Cleveland Avenue. Both Conway Drive and Cleveland Avenue are low-volume roadways. The project includes a dead-end Street “B” that terminates in a cul-de-sac. Street “B” is 36-foot wide, approximately 400 feet long, and has a code approved cul-de-sac, with a 48-foot turning radius. The code allowable dead-end road length is 800 feet for this project’s lot sizes; thus, the project meets the dead-end road length requirement (Dudek 2025a). Road grades would comply with the County of San Diego’s Standards for Private Roads and Public Roads, per Section 503.2.7 of the Escondido Fire Code. Minimum vertical clearance of 13 feet 6 inches would be maintained for the entire required width of fire access roads (Dudek 2025a).

The proposed project would also not create a roadway hazard from incompatible uses. The proposed residential uses are compatible with the surrounding residential neighborhoods. Therefore, the proposed project would not substantially alter the operation of nearby intersections, necessitate improvements, or create new hazardous conditions. Impacts are **less than significant**.

d) Result in inadequate emergency access? Less than Significant Impact

Per the FPP prepared for the project site (Dudek 2025a), access to the project would be from points on Cleveland Avenue and Conway Drive, both of which would connect to the internal “Street A”. The existing Cleveland Avenue and Conway Drive are in compliance with the existing code for street width and allow for the increased capacity, safety, and evacuation efficiency. Internal circulation includes Street “A” that connects to both Conway Drive and Cleveland Avenue and is 36 -feet wide. Street “B” is a dead-end cul- de-sac that is 36 feet wide, and approximately 400 feet long, that terminates in a cul-de-sac with a 48-foot turning radius bulb. All on-site fire access roads would be designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 pounds) and would be consistent with code requirements for all weather paving surfaces.

Site access, including fire lane, driveway, and entrance road widths, primary and secondary access, turnarounds, dead-end lengths, signage, surface, and other requirements would comply with the City’s

roadway standards as identified in the most currently adopted Escondido Fire Code and California Building Code. Fire access would be reviewed and approved by EFD prior to construction. Therefore, the project would not result in inadequate emergency access and a **less than significant impact** is identified.

3.18 Tribal Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?		X		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Less Than Significant Impact with Mitigation Incorporated**

As detailed in Appendix D, the general vicinity of the project area is known to have been occupied by the Luiseño people for thousands of years. A RECON Environmental, Inc. (RECON) archaeologist performed the cultural resources survey of the approximately 10.38-acre project area on May 29, 2025. Prior to the survey, a records search with a one-mile radius buffer of the project area was

requested from the SCIC. RECON contacted the NAHC requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas, and to provide a list of local Native American tribes, bands, or individuals who may have concerns about the project. A response letter from the NAHC was received on April 16, 2025, indicating that their Sacred Lands File search results were positive.

One previously recorded historic-era resource (P-37-012547, a historic trash scatter) was identified within the area of potential effect (APE) during the archaeological survey. RECON recommends P-37-012547 not significant. No other significant or potentially significant prehistoric or historic cultural resources were observed during the survey of the APE. Therefore, the project would not adversely affect known historical resources. The APE has been fully disturbed by past agricultural ground-disturbing activities, such as periodic discing and mowing. Because the files at the SCIC did indicate previously recorded archaeological cultural resources in the APE and its vicinity, and because the project would require subsurface grading beyond the levels of previous disturbance, there is a potential for impacts to previously unidentified resources (Impact TCR-1). A construction monitoring program is recommended as a mitigation measure to reduce potential impacts to undiscovered significant archaeological deposits or features.

Mitigation measures MM-CR-1 through MM-CR-10 identified in Section V, above, would be implemented to ensure that potential impacts to tribal cultural resources would be **less than significant with mitigation incorporated**.

- b) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. Less Than Significant Impact with Mitigation Incorporated**

On November 10, 2024, in compliance with California Public Resources Code Section 21080.3.1 (AB 52), the City of Escondido, as Lead Agency, sent emailed letters to the local tribes notifying them of the proposed project. Responses to the AB 52 consultation notice were received from Pala Band of Mission Indians, Rincon Band of Luiseño Indians, and Viejas Band of Kumeyaay Indians. Therefore, it is assumed that potentially significant impacts to TCRs would occur (Impact TCR-1). Construction monitoring by an archaeologist and Native American tribal representative would be implemented during project grading, in accordance with Mitigation Measures MM-CR-1 through MM-CR-10 identified in Section V, to address the inadvertent discovery of unknown buried archaeological resources or TCRs. Less-than-significant impacts would occur with mitigation incorporated.

3.19 Utilities and Services Systems

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

The proposed project would be served by the City of Escondido water and sewer. SDG&E would provide electric and gas services to the project site. Escondido Disposal, Inc. (EDI) would provide waste and recycling services to the project.

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? Less Than Significant Impact**

Water and sewer service to the project site would be provided by the City of Escondido. The project would connect to an existing public 8-inch water main at the intersection of Cleveland Avenue and Conway Drive. The project would install a new 8-inch water line from the project entrance on Cleveland Avenue to the existing water main at Cleveland Avenue and Conway Drive. This line extension would occur within a paved roadway. The project would connect to the existing 8-inch sewer line at Conway Drive.

The project applicant would be required to pay development fees included in the City of Escondido Fee Guide for Development Projects, in effect at the time of building permit issuance, including fees for water connection, wastewater connection, drainage facilities, San Diego County Water Authority capacity charge, and green building fees.

Both the water and wastewater treatment systems have sufficient capacity to accommodate the proposed project. Dry utilities, including electric, natural gas, and telecommunications, are also available within adjacent streets. Storm water drainage is discussed above in Section 4.10, Hydrology and Water Quality. Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? Less Than Significant Impact**

The City of Escondido provides potable water to its residents and would serve the proposed project. The City of Escondido supplies water to approximately 150,000 residential, commercial, and agricultural customers with water from the Escondido-Vista Water Treatment Plant. The plant treats all raw water before it is delivered to customers. The Water Treatment Plant was constructed in 1976 and its capacity is now 75 million gallons per day (MGD) (City of Escondido 2025d).

The City has multiple sources for its raw water. Local water originates from the watershed and well fields located near Lake Henshaw. The water is transferred to Lake Wohlford via an open canal. Additional water is purchased from the Colorado River and from Northern California via the State Water Project through the Metropolitan Water District and San Diego County Water Authority. The water is stored in Dixon Lake (City of Escondido 2025d).

After treatment, water is distributed from the Escondido-Vista Water Treatment Plant to the Vista Irrigation District, parts of Rincon del Diablo MWD, and throughout Escondido through a system of pipelines and reservoir (City of Escondido 2025d).

In August 2023, the City of Escondido Water Treatment Plant started treating and distributing water from Lake Wohlford, a local water source (City of Escondido 2025c).

The City's Urban Water Management Plan (UWMP) included a supply and demand assessment for normal, dry, and multiple dry years. The UWMP determined that there would be sufficient water supply to meet demand during normal and dry years and sufficient supply during multiple dry years when

water conservation methods are considered (City of Escondido 2016). The proposed project is consistent with the existing zoning and General Plan designations, so the project's water demand was included in the City's water demand projections. Therefore, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple years. Impacts would be **less than significant**.

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

The proposed project would be served by the City's sewer system. The City of Escondido operates the Hale Avenue Resource Recovery Facility (HARRF), which provides wastewater treatment. The HARRF started at its current location in 1959 and is an activated sludge, secondary treatment facility. This consists of physical, biological, and chemical treatment methods, which include screening, sedimentation, chemical precipitation, and biological processes. The City of Escondido operates the HARRF for the benefit of the City and the Rancho Bernardo area of the City of San Diego. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day. The average daily flow is 12.7 MGD, comprised of Escondido's flow of 9.7 MGD and Rancho Bernardo's flow of 3.0 MGD (City of Escondido 2025b). Therefore, while the proposed project would increase demand on the HARRF, sufficient capacity exists to accommodate the proposed project. Therefore, impacts would be **less than significant**.

- d) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Less than Significant Impact**

Construction

The California Green Building Standards Code requires all newly constructed buildings to develop a Construction Waste Management Plan (CWMP) and divert a minimum of 65% non-hazardous construction debris. Senate Bill 1374 and the California Code of Regulations Title 24 require developers to help divert waste from landfills and comply with statewide mandates. Construction and Demolition (C&D) materials include, but are not limited to asphalt, concrete, brick, dirt, rock, lumber, cardboard, metals and any vegetative or other land clearing/landscaping materials. The City of Escondido requires applicants to submit part 1 of the Construction Waste Management Plan for approval prior to issuance of a building permit. Therefore, construction of the proposed project would not impair the attainment of solid waste reduction goals.

Operation

The anticipated solid waste generation from the proposed project was estimated using CalRecycle Estimated Solid Waste Generation Rates (CalRecycle 2019a). It is estimated that the 29 single-family dwelling units would generate approximately 355 pounds of solid waste per day (12.23 pounds per household). This does not consider any waste diversion through recycling. The project would be required to adhere to the City's disposal, recycling and organics composting requirements that contribute toward meeting solid waste reduction goals.

Escondido Disposal, Inc. (EDI) provides waste and recycling services to the City of Escondido. EDI's residential service consists of weekly collection of household trash, organics and recyclables. EDI takes collected waste to the Escondido Resource Recovery transfer station, where trash is sorted into recyclable, organics, and refuse. The Escondido Transfer Station has a permitted daily tonnage of 3,223 tons per day (CalRecycle 2019b). Solid waste is consolidated here and then trucked to a landfill

for disposal. Waste is likely to be transported to the West Miramar Landfill or Sycamore Sanitary Landfill.

In 2022, the County of San Diego prepared a Five-Year Review Report of its Integrated Waste Management Plan to plan for the next 15 years of countywide landfill disposal capacity and to determine the adequacy of the region's planning documents based on updated demographic trends and regulations. The report used an average of the past 15 years in-county disposal data (2005-2020) to project disposal for the next 15 years (2022-2037). The 15-year disposal average is 3,206,009 in-county tons annually (County of San Diego 2022). When the 75% organics diversion rate (to align with statewide organics legislation and goals (AB 32, AB 1826, AB 1594, and SB 1383)) was applied to the County's baseline disposal, the projected disposal by 2037 would be 2,282,678 tons annually, nearly a million tons (923,330 tons) less than the average disposal projection of 3,206,009 tons (County of San Diego 2022).

The second component of determining disposal capacity is the permitted daily capacities allowed by the Local Enforcement Agencies including any projected maximum disposal limits. The maximum annual allowable permitted capacity for all San Diego County landfills was 6,967,600 tons in 2021 and will be 4,134,600 tons in 2032. Landfill operators project that Otay Landfill will close in 2030 and Miramar Landfill will close in 2031 (County of San Diego 2022). Miramar's current maximum permitted throughput is 8,000 tons per day (CalRecycle 2019c). Sycamore Landfill is anticipated to receive additional waste flows when the Otay and Miramar landfills close. The County's report projections assumed that Sycamore Landfill will apply for three expansions to their daily permitted capacity of 5,000 tons per day. For the purposes of projection, the County assumed that the first expansion at Sycamore Landfill is estimated to occur in 2025 and daily permitted capacity is projected to increase permitted capacity to 7,000 tons per day. The second expansion is estimated to occur in 2027 and permitted capacity is projected to increase to 9,000 tons per day followed by a third expansion estimated to occur in 2030 to increase permitted capacity to 11,000 tons per day. The County's report indicated that there would be adequate landfill capacity to serve the County for the next 15 years. (County of San Diego 2022).

Solid waste generated by the proposed project of 355 pounds of solid waste per day would contribute a minimal amount of solid waste to the daily permitted capacity of Escondido Transfer Station (3,223 tons per day), Miramar Landfill (8,000 tons per day) or Sycamore Landfill 5,000 tons per day). As such, the proposed project's solid waste generation can be accommodated at the landfill. The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be **less than significant**.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? Less than Significant Impact

The proposed project would comply with all federal, state, and local statutes and regulations regarding solid waste. The City implements programs applicable to the proposed project that comply with these statutes. One strategy required of residents of residential communities, such as the proposed project, is curbside separation of trash into recyclable, green waste, and solid waste. The City also implements free disposal days, waste tire processing, Christmas tree collection, household hazardous waste centers, and used oil collection centers. Furthermore, the City's Green Building Program requires recycling and diversion from landfills, which would apply during construction of the proposed project.

Additionally, all solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, Public Resources Code (sections 44001- 44018) and California Code of

Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.) authorizes the County Department of

Environmental Health, Local Enforcement Agency to issue solid waste facility permits. West Miramar Sanitary Landfill and Sycamore Sanitary Landfill are permitted facilities, and EDI is a licensed hauler. As such, the proposed project would comply with existing regulations related to solid waste disposal and would not violate federal, state, or local management and reduction statutes and regulations related to solid waste. Impacts would be **less than significant**.

3.20 Wildfire

If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zone:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing wind, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslide, as a result of run-off, post-fire slope instability, or drainage changes?			X	

The four wildfire thresholds relate specifically to projects located in or near state responsibility areas or lands classified as very high fire severity zones. The project site is not in a state responsibility area.

The project site is designated as a Very High Fire Hazard Severity Zone within a Local Responsibility Area (LRA) by the California Department of Forestry and Fire Protection (CAL FIRE).

An FPP was prepared by Dudek and is included in **Appendix M** (Dudek 2025a). Additionally, A Wildfire Evacuation Study (WES) was prepared by Dudek and is included in **Appendix N** (Dudek 2025b). An analysis of whether the proposed project would expose people or structures to significant risk of loss, injury or death involving wildland fires was presented in Section 4.9(g) of this document and impacts were determined to be less than significant. The following section analyzes the four wildfire thresholds, which are applicable since the project site is designated by CALFIRE as a Very High Fire Hazard Severity Zone.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
Less than Significant Impact

A WES (**Appendix N**) was prepared to evaluate the project's consistency with relevant emergency evacuation plans and emergency response plans, disclose the prevention and minimization regulations and measures applicable to the project, and determine evacuation times for the existing and post-project conditions, as well as provide recommendations for emergency preparedness that include information and resources to increase occupant preparedness for wildfire evacuations (Dudek 2025b).

Although the project is within the City of Escondido, the City has adopted and relies on the County of San Diego's Operations Area Emergency Operations Plan for evacuation procedures and other emergency related policies. Depending on the emergency, the Escondido Police Department would be responsible for evacuations of the project site. The nature of the incident and the organization of the Emergency Operations Center or the Command Center will dictate whether the Escondido Police Department or the San Diego County Sheriff's Department will be the lead agency for an evacuation under the Incident Command System.

The project site is adjacent to two roadways and residential neighborhoods to the north, west and east of the site. Wildfire risk for the project site is believed to be from short-duration ember production from a wildfire burning in open spaces within the project's vicinity. An early evacuation of the project site may occur if a wildfire burns closely in the open spaces to the east of the project. However, the surrounding terrain does not support aggressive runs at the community, which is separated from the open space by developed areas and wildfire during typical weather conditions are less aggressive and more manageable, rarely resulting in large evacuations. As conducted in past wildfires, an early evacuation of the area may occur several or more hours prior to actual threatening conditions at the proposed project site, depending on conditions and fire spread projections (Dudek 2025b).

There is no existing evacuation plan for the area or pre-determined evacuation routes, therefore the project would not eliminate or interfere with any existing evacuation routes. The primary evacuation routes available to the future occupants of the project site that lead to the I-15 include Conway Drive, Cleveland Avenue, North Broadway, Rincon Avenue, Jesmond Dene Road, Country Club Lane, and Centre City Parkway (Dudek 2025b). In an evacuation or emergency scenario, adequate emergency access would be maintained. Even though roads adjacent and near to the project are not determined evacuation routes, the project would not result in road or lane closures, maintaining ingress and egress, and the roads could be used for emergency vehicle access. In the event of an emergency evacuation, law enforcement would control evacuations and determine the safest route for evacuees to utilize. Further, the available roadway capacity is sufficient to safely accommodate the number of evacuating vehicles within the relevant areas with and without the project development. The WES

demonstrated that evacuation times would be reasonable and would allow for safe evacuations to be conducted under all scenarios (Dudek 2025b). Therefore, the project does not propose any development that would impair implementation or physically interfere with any adopted emergency response plan or evacuation plan. Project impacts would be **less than significant**.

b) Due to slope, prevailing wind, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire? Less than Significant

Wildland fires are a common natural hazard in most of Southern California with a long and extensive history. Given the climatic, vegetative, topographic characteristics, and local fire history of the area, the project site, once developed, may be subject to the occasional instance of wildfires in the project vicinity. Potential for wildfire encroaching onto the project is unlikely due to the lack of wildland interface, however showering embers on the site is possible. The risk of ignition from such encroachments or ember showers is also considered low based on the type of construction, fuel modification zones, and fire protection features that would be provided for the structures (Dudek 2025a).

Development of a residential project in a Very High Fire Hazard Zone could exacerbate wildfire risk and expose occupants in the following ways: introduction of new ignition sources (vehicular traffic, outdoor equipment use, and human activity); interaction with slope and wind (however, the project site is comprised of relatively flat terrain and flat terrain tends to have little effect on fire spread); and exposure to pollutant concentrations (wildfire smoke contains high levels of PM2.5, CO, VOCs and hazardous air toxics). However, the proposed homes would be built to the latest ignition-resistant building codes found in Chapter 7A of the California Building Code (CBC), and any additional restrictions or requirements adopted locally by the Escondido Fire Code and San Diego County Consolidated Fire Code. Measures such as ignition-resistant construction features would alleviate human-caused increases in wildfire risks because they would make development less likely to ignite in the event of a fire and would promote avoidance of damage to life and property. Automatic interior residential fire sprinklers would also further reduce human-caused wildfire risk because in the event a building were to catch fire, the sprinklers would emit water which would assist in extinguishing the fire, opposed to relying on emergency response from firefighters to provide water to extinguish a building structure fire. Additionally, the proposed project, once developed, would provide each structure with defensible space that would reduce projected flame lengths to levels that would be manageable by firefighting resources for protecting the site's structures, especially given the ignition resistance of the structures and the planned ongoing maintenance of the entire site's landscaping (Dudek 2025).

As outlined in the FPP, once the project is constructed, the on-site fire potential would be lower than its current condition due to conversion of areas of wildland fuels to managed landscapes, extensive fuel modification areas, improved accessibility to firefighting personnel and equipment, and new structures built to the latest ignition-resistant codes (Dudek 2025a). With implementation of development consistent with wildfire related regulations along with stringent fire safety measures, the introduction of residents into a wildfire hazard area would not exacerbate wildfire risk. The project would also not increase the potential that residents would be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be **less than significant**.

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 the temporary or ongoing impacts to the environment? Less than Significant

The project proposes infrastructure improvements specifically to support the project, including access roads, internal circulation roadways, frontage improvements, extensions of water and sewer lines and a comprehensive water quality management approach. The proposed project would connect to existing infrastructure within Cleveland Avenue and Conway Drive. Proposed irrigated and maintained fuel modification zones are incorporated into the project design that would be subject to regular “disturbance” in the form of maintenance and would not be allowed to accumulate excessive biomass over time, which results in reduced fire ignition, spread rates, and intensity. As outlined in the FPP, once the project is constructed, the on-site fire potential would be lower than its current condition due to conversion of areas of wildland fuels to managed landscapes, extensive fuel modification areas, improved accessibility to firefighting personnel and equipment, and new structures built to the latest ignition-resistant codes (Dudek 2025a). There are no aspects of the project that would install infrastructure that would exacerbate fire risk or result in the temporary or ongoing impacts to the environment. Impacts would be **less than significant**.

- d) **Expose people or structure to significant risk, including downslope or downstream flooding or landslide, as a result of run-off, post-fire slope instability, or drainage changes?** Less than Significant

Per the geotechnical report prepared for the project (GeoTek 2024a) there was no evidence of landslides or slope instabilities observed during the geotechnical field work. Hydrology and drainage were analyzed in Section 4.10 of this document and all impact were determined to be **less than significant**.

3.21 Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?		X		

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X		
c) Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre-history? Less Than Significant Impact with Mitigation Incorporated**

A Biological Resources Report was prepared for the project site and identified potential impacts resulting from the project (RECON 2025a). The project has the potential to impact Cooper's hawk and other avian species protected under the MBTA and potential direct impact to CBB. Implementation mitigation measures **MM-BIO-1a**, **MM-BIO-1b** and **MM-BIO-2** would reduce these potential impacts to below a level of significance and the project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

A cultural resources study (RECON 2025b) was prepared for the project and did not identify any significant cultural resources on the site. Per CEQA, P-37-012547 does not qualify under criteria 1 and 2 because no significant event or person could be associated with the resource. The resource does not qualify under criterion 3 because the criterion applies to the built environment. The scatter of cultural constituents making up P-37-012547 is not a structure, building or portion thereof, so it does not exhibit the type of characteristics required for significance under this criterion. P-37-012547 does not qualify under criterion 4 because due to research performed by Ogden, the site is not likely to yield information important to history; therefore, the recording of the cultural constituents of P-37-012547 has exhausted its research potential.

However, because the files at the SCIC did indicate previously recorded archaeological cultural resources in the project and its vicinity, and because the project would require subsurface grading beyond the levels of previous disturbance there is a potential for impacts to previously unidentified subsurface archaeological resources. This represents a significant impact (Impact CR-1). Mitigation measures MM-CR-1 through MM- CR-10 have been included to reduce the potential for impacts to cultural resources to below a level of significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) Less Than Significant Impact with Mitigation Incorporated.**

As shown in **Figure 6**, there are two pending development projects in the vicinity of the proposed project. The recently approved IKSON of Escondido Krishna Temple and Residential project is located on Rincon Avenue, east of Conway Drive, approximately 1,700 feet south of the project site. The Capistrano residential development, located at the intersection of Stanley Avenue and Conway Drive, is approximately 2,800 feet south of the project site.

The IKSON project identified impacts related to biological resources (coastal sage scrub, non-native grassland, nesting birds, mature trees and sensitive species). The IKSON project also identified impacts related to archaeological resources, paleontological resources, hazards (wildfire), construction noise, and tribal cultural resource. Mitigation measures were identified to reduce all impacts to below a level of significance.

The Capistrano project identified project related to air quality, biological resources (nesting birds, oak woodland habitat, mature trees), cultural resources, geology/soils, hazards/hazardous materials, noise, transportation/traffic, and tribal cultural resources. Mitigation measures were identified to reduce all impacts to below a level of significance.

As concluded throughout this IS/MND, the proposed project would result in either no impact, less-than- significant impact, or a less-than- significant impact with mitigation incorporated with respect to all environmental impact areas outlined in the CEQA Guidelines **Appendix G** Environmental Checklist, which, in turn, would reduce the potential for these impacts to be considered part of any cumulative impact.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? Less Than Significant Impact with Mitigation Incorporated**

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 sections 4.1. Aesthetics, 4.3. Air Quality, 4.7. Geology and Soils, 4.9. Hazards and Hazardous Materials, 4.10. Hydrology and Water Quality, 4.13. Noise, 4.14. Population and Housing, 4.15. Public Services, 4.17. Transportation, and 4.20 Wildfire. As a result of this evaluation, there is no substantial evidence that there would be adverse effects on human beings associated with this project. All impacts in these environmental issue areas are less than significant or mitigated to below a level of significance through implementation of mitigation measures that would be required as a condition of project approval (**MM-GEO-1**, **MM-N-1** and **MM-N-2**). Therefore, this project has been determined not to meet this Mandatory Finding of Significance and impacts are less than significant with the incorporation of mitigation.

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This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

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