CLIMATE ACTION PLAN CONSISTENCY REVIEW CHECKLIST

INTRODUCTION

The City of San Marcos (City) adopted an updated Climate Action Plan (CAP) in December, 2020. The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. The purpose of the CAP Consistency Checklist (Checklist), in conjunction with the CAP, is to provide a streamlined review process for all proposed development projects that are subject to discretionary review and/or trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The City's CAP is a qualified greenhouse gas (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.

The purpose of this Checklist is to implement GHG reduction measures from the CAP that apply to new discretionary development projects. New development would demonstrate consistency with relevant CAP strategies and would not conflict with the City's ability to achieve the identified GHG reduction targets through implementation of applicable measures. Projects that are consistent with the CAP, as determined through the use of this Checklist, may rely on the CAP for the cumulative impact analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

This Checklist may be updated periodically to incorporate new GHG reduction techniques or to comply with later amendments to the CAP or local, State, or federal law. Comprehensive updates to this Checklist will be coordinated with each CAP update. Administrative updates to the Checklist may occur regularly, as necessary for the purpose of keeping the Checklist up-to-date and implementable. Updates to the CAP Checklist associated with an update to the City's CAP would also require City Council approval and shall comply with CEQA.

APPLICABILITY AND PROCEDURES

This Checklist is required only for discretionary projects[1] that are subject to and not exempt from CEQA. Projects that are exempt from CEQA are deemed to be consistent with the City's CAP, and no further review is necessary, with the exception of a Class 32 "In-Fill Development Projects" categorical exemption (State CEQA Guidelines Section 15332), for which projects are required to demonstrate consistency with the CAP through this Checklist.

General procedures for Checklist compliance and review are described below. Specific guidance is also provided under each of the questions under Steps 1 and 2 of the Checklist.

- The City's Development Services - Planning Division reviews development applications and makes determinations regarding environmental review requirements under CEQA.
- The specific applicable requirements outlined in the Checklist shall be required as conditions of project approval.
- The project must provide written documentation and supporting evidence that demonstrate how the proposed project would implement each applicable Checklist requirement described herein to the satisfaction of the Planning Division.
- If a question in the Checklist is deemed not applicable (N/A) to a project, written documentation and evidence supporting that conclusion shall be provided to the satisfaction of the Planning Division. Each Checklist question provides the scenario(s) where checking N/A may be acceptable. If a measure is deemed not applicable for reasons other than those outlined in each question, supporting evidence will need to be provided and would be subject to Planning Division approval. A project may be determined to be inconsistent with the CAP if the N/A response is deemed to be not supported by credible evidence.
- Development projects requiring discretionary review that cannot demonstrate consistency with the CAP using this Checklist shall prepare a separate, project-level GHG analysis as part of the CEQA document prepared for the project.

[1] In this context, a project is any action that meets the definition of a "Project" in Section 15378 of the State CEQA Guidelines.

Application Information

Contact Information

Project No. and Name: Sunrise of San Marcos (SDP23-0002)

Property Address and APN: 9 San Elijo Road (APN 223-651-01-00)

Applicant Name and Co.: Joel Warsh, Sunrise Senior Living

Contact Phone: 858-663-8814 Contact Email: Joel.Warsh@sunriseseniorliving.com

Was a consultant retained to complete this checklist? X Yes ☐ No

If Yes, complete the following:

Consultant Name: Sophia Habl Mitchell Contact Phone: 858-243-0843

Company Name: Sophia Mitchell & Associates Contact Email: sophia@mitchellplanning.net

Project Information

1. What is the size of the project site (acres)? 2.45 acres (2.18 acres in San Marcos)

2. Identify all applicable proposed land uses:

- ☐ Residential (indicate # of single-family dwelling units): _____
- ☐ Residential (indicate # of multi-family dwelling units): _____
- ☐ Commercial (indicate total square footage): _____
- ☐ Industrial (indicate total square footage): _____
- ☑ Other (describe): 93,375 s.f. assisted living/memory care facility with up to 97 units.

3. Provide a description of the project proposed. This description should match the basic project description used for the CEQA document. The description may be attached to the Checklist if there are space constraints.

The project proposes development of an assisted living and memory care facility with access off of San Elijo Road and Paseo Plomo. The majority of the project is located within San Marcos and a small portion of the site is included in Carlsbad. The project applicant is requesting approval of a Site Development Plan (SDP23-0002) to construct a two-story, 93,375 s.f. assisted living and memory care facility consisting of 92 units above 25,100 s.f. of below grade parking. The MND is analyzing 97 units and up to 129 beds to provide flexibility for the project applicant to respond to changing market conditions.

Additionally, the project includes physical improvements including driveway, grading and landscaping within a small portion of a lot located in the City of Carlsbad. The project would include a single phase of construction. Grading includes approximately 1,400 cubic yards (cy) of cut (all within the San Marcos portion) and 25,300 cy of fill (22,900 cy in San Marcos and 2,400 cy in Carlsbad), for a net import of 23,900 cy. A Minor Hillside Development Permit (HDP 2024-0006) and Minor Habitat Management Plan Permit (HMP 2024-0008) would be required to create access via Paseo Plomo.

STEP 1: LAND USE CONSISTENCY

The first step in this section evaluates a project's GHG emissions consistent with the City's *Guidance to Demonstrating Consistency with the City of San Marcos Climate Action Plan: For Discretionary Projects Subject to CEQA* (Guidance Document). New discretionary development projects subject to CEQA review that emit fewer than 500 metric tons of carbon dioxide equivalent ($MTCO_2e$) annually would not contribute considerably to cumulative climate change impacts as stated in the City's Guidance Document, and therefore, would be considered consistent with the CAP and associated emissions projections.

For projects that are subject to CAP consistency review, the next step in determining consistency is to assess the project's consistency with the growth projections used in the development of the CAP. This section allows the city to determine a project's consistency with the land use assumptions used in the CAP.

Step 1: Land Use Consistency

	Checklist Item (Check the appropriate box and provide an explanation and supporting documentation for your answer)	**Yes**	**No**
1.	The size and type of projects listed below would emit fewer than 500 $MTCO_2e$ per year. Based on this threshold, does the proposed project exceed these characteristics? ▪ Single Family Housing: 36 dwelling units ▪ Multi-Family Housing: 55 dwelling units ▪ Office: 43,000 square feet ▪ Commercial Space: 20,000 square feet ▪ Regional Shopping Center: 18,000 square feet ▪ Hotel: 37 rooms ▪ Restaurant (Sit-Down): 6,500 square feet ▪ Restaurant (Drive-Thru, High Turnover): 2,400 square feet ▪ General Light Industrial: 58,000 square feet ▪ University: 263 students ▪ Mixed-Use: See *Guidance to Demonstrating Consistency* memorandum for methods to estimate mixed-use development thresholds ▪ Other: For project types not listed in this section the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 $MTCO_2e$ per year screening threshold. Per the GHG report prepared for the proejct (LDN 2025), the project's GHG emissions will be below 500 MTCO2e per year. If **"Yes",** proceed to Question 2 of Step 1. If **"No",** in accordance with the City's CAP screening criteria, the project's GHG impact is less than significant and is not subject to the measures of the CAP.	☐	X
2.	Is the proposed project consistent with the City's existing General Plan land use designation? If **"Yes"**, proceed to Step 2. If **"No"**, proceed to Question 3 of Step 1	☐	☐
3.	For projects not consistent with the existing General Plan land use designation, does the project include a General Plan Amendment that would generate GHG emissions equal to or less than estimated emissions generated under the existing designation? If **"Yes"**, proceed to Step 2 and provide estimated project emissions under both existing and proposed designation(s) for comparison. If **"No"**, the project's GHG impact is potentially significant, and a GHG analysis must be prepared in accordance with the City's Guidance Document and applicable CEQA guidelines. The project must incorporate each of the measures identified in Step 2 to mitigate cumulative GHG emissions impacts, along with other mitigation measures as necessary based on a project specific GHG analysis.. Proceed and complete a project specific GHG analysis, and Step 2 of the Checklist.	☐	☐

STEP 2: CAP MEASURES CONSISTENCY

The second step of CAP consistency review is to evaluate a project's consistency with the applicable strategies and measures of the CAP. Each Checklist item is associated with a specific GHG reduction measure in the City's CAP. "N/A" should only be checked based on the direction provided in each Checklist Item question. All projects for which the measure is applicable must demonstrate that they would implement measures consistent with the Checklist Item, or fully substantiate how the item would be infeasible for project implementation. "N/A" responses are subject to Planning Division review and approval. If "No" is provided as a response to a question, the project would be determined to be inconsistent with the CAP and result in a significant GHG impact.

Step 2: CAP Measures Consistency			
Checklist Item (Check the appropriate box and provide an explanation for your answer. Please use additional sheets if necessary)	**Yes**	**No**	**N/A**
Project Design			
1. Electric Vehicle Charging Stations (Measure T-2) Multi-Family Residential and Non-Residential: Will the project install electric vehicle charging stations (Level 2 or better) in at least five percent of the total parking spaces provided on-site? Check "N/A" if the project is a single-family residential project or would not provide any parking.	☐	☐	☐
Please substantiate how the project satisfies question 1: _____ _____ _____ _____			
2. Bicycle Infrastructure (Measure T-8) Residential and Non-Residential Projects: If the following conditions are met, would the project pay its fair-share contribution to bicycle infrastructure improvements? ☐ Intersection or roadway segment improvements are proposed as part of the project and, ☐ The City's General Plan Mobility Element identifies bicycle infrastructure improvements at any intersection(s) or roadway segment(s) that would be improved as part of the project. Check "N/A" if the conditions above would not be met.	☐	☐	☐
Please substantiate how the project satisfies question 2: _____ _____ _____ _____			

Step 2: CAP Measures Consistency			
Checklist Item (Check the appropriate box and provide an explanation for your answer. Please use additional sheets if necessary)	**Yes**	**No**	**N/A**
3. Transportation Demand Management (Measure T-9) Residential and Non-Residential: Will the project comply with the City's Transportation Demand Management (TDM) Ordinance (Chapter 20.350 of the Municipal Code) and the TDM Policy?[2] Check "N/A" if the project is a single-family residential project or is not subject to the City's TDM Ordinance.	☐	☐	☐

Please submit a project specific TDM Plan for staff review and evaluation based on guidance included in the TDM Policy.

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_____
_____
_____

4. Reduce Parking Near Transit (Measure T-12) Multi-Family Residential: If located within a half-mile of a major transit stop[2], would the project provide at least 27 percent fewer parking spaces than required for the same use based on the City's municipal code parking requirements? Check "N/A" if the project is a single-family residential or non-residential project.	☐	☐	☐

Please substantiate how the project satisfies question 4:

_____
_____
_____
_____
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_____

[2] City of San Marcos TDM Ordinance and Policy: https://www.san-marcos.net/departments/development-services/planning/ceqa-resources-for-applicants-consultants

Step 2: CAP Measures Consistency			
Checklist Item (Check the appropriate box and provide an explanation for your answer. Please use additional sheets if necessary)	**Yes**	**No**	**N/A**
5. Water Heaters (Measure E-1) Residential: Will the project install one of, or a combination of, the following water heater types in place of natural gas water heaters? ☐ Electric heat pump water heater ☐ Instantaneous electric water heater ☐ Electric tank ☐ Solar water heater with heat pump water heater backup ☐ Solar water heater with electric tank backup Check "N/A" if the project is a non-residential project.	☐	☐	☐
Please substantiate how the project satisfies question 5: _____ _____ _____ _____ _____ _____			
6. Photovoltaic Installation (Measure E-2) Non-Residential: Will the project install photovoltaic systems with a minimum capacity of two watts per square foot of gross floor area? Check "N/A" if the project is a residential project or if installation of on-site photovoltaic would be infeasible.	☐	☐	☐
Please substantiate how the project satisfies question 6: _____ _____ _____ _____ _____			

Step 2: CAP Measures Consistency			
Checklist Item (Check the appropriate box and provide an explanation for your answer. Please use additional sheets if necessary)	**Yes**	**No**	**N/A**
7. Landscaping Water Use (Measure W-1) Residential and Non-Residential: Will the project comply with the City's Water Efficient Landscape Ordinance?[3] Check "N/A" if the project is not proposing any landscaping or is not subject to the City's Water Efficient Landscape Ordinance.	☐	☐	☐
Please substantiate how the project satisfies question 7: _____ _____ _____ _____ _____ _____			
8. Urban Tree Canopy (Measure C-2) Single-Family Residential: Will the project plant a minimum of one tree per single-family residential unit? *-or-* Multi-Family Residential and Non-Residential: If the project is providing more than 10 parking spaces, will the project plant at least one tree per five parking spaces provided? Check "N/A" if planting the required number of trees on-site would be infeasible.	☐	☐	☐
Please substantiate how the project satisfies question 8: _____ _____ _____ _____ _____ _____			

[3] City of San Marcos Landscape Manual: https://www.san-marcos.net/home/showdocument?id=13984