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**Initial Study for the
Kaiser Permanente Medical Center Project
Site Development Plan 19-0005**

Prepared for:

City of San Marcos

Development Services Department, Planning Division

1 Civic Center Drive

San Marcos, California 92069

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Table of Contents

<u>SECTION</u>	<u>PAGE NO.</u>
ACRONYMS AND ABBREVIATIONS.....	III
1 INTRODUCTION TO THE INITIAL STUDY CHECKLIST	1
2 INITIAL STUDY CHECKLIST	9
2.1 Aesthetics	13
2.2 Agriculture and Forestry Resources	15
2.3 Air Quality	17
2.4 Biological Resources	19
2.5 Cultural Resources	21
2.6 Energy	22
2.7 Geology and Soils	23
2.8 Greenhouse Gas Emissions	26
2.9 Hazards and Hazardous Materials	27
2.10 Hydrology and Water Quality	31
2.11 Land Use and Planning	34
2.12 Mineral Resources	34
2.13 Noise	35
2.14 Population and Housing	37
2.15 Public Services	38
2.16 Recreation	40
2.17 Transportation	41
2.18 Tribal Cultural Resources	42
2.19 Utilities and Service Systems	43
2.20 Wildfire	46
2.21 Mandatory Findings of Significance	47
3 REFERENCES AND PREPARERS	49
3.1 References Cited	49
3.2 List of Preparers	50
 FIGURES	
1 Regional Map	51
2 Vicinity Map	53
3 Existing Conditions	55
4 Conceptual Site Plan	57

TABLES

1	Comparison of the Modified Project with the 1992 SEIR Project	5
2	Required Actions and Approvals – Other Public Agencies	8

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
BP	Business Park
CEQA	California Environmental Quality Act
DOC	California Department of Conservation
ESA	Investigation and Environmental Site Assessment
FAZ	Flight Activity Zone
FMMP	Farmland Mapping and Monitoring Program
HC	Hospital Complex
HCSP	Heart of the City Specific Plan
IS	Initial Study
MHCP	Multiple Habitat Conservation Program
MOB	medical office building
NCCP	Natural Community Conservation Plan
SDSU	San Diego State University
SEIR	Supplemental Environmental Impact Report
SMUSD	San Marcos Unified School District
SPA	Specific Plan Area
TDM	Traffic Demand Management
VHFHSZ	Very High Fire Hazard Severity Zone
VWD	Vallecitos Water District

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1 Introduction to the Initial Study Checklist

1. Project title:

Kaiser Permanente Medical Center Project

2. Lead agency name and address:

City of San Marcos
Development Services Department, Planning Division
1 Civic Center Drive
San Marcos, California 92069

3. Contact person and phone number:

Norm Pedersen, Associate Planner
City of San Marcos Planning Division
760.744.1050 ext. 3236

4. Project location:

The City of San Marcos (City) is located in the central portion of the north San Diego County, 30 miles north of downtown San Diego, and 90 miles south of Los Angeles. The City is bounded on the west by the cities of Carlsbad and Vista, on the east by the City of Escondido, and by unincorporated areas of San Diego County to the west, north and south (Figure 1, Regional Map). The project site for the proposed Kaiser Permanente Medical Center Project (project) would be located on two parcels at 400 Craven Road. The majority of the proposed project would be developed on the northern portion of Assessor's Parcel Number (APN) 221-091-25-00 on approximately 12 acres just to the north of four existing Kaiser Permanente medical office buildings (MOBs). The remainder of the project would be developed on APN 221-091-24-00, which is a triangular parcel that is approximately 7.96 acres and is not a part of the adopted development agreement. The project site would be located in the Barham/Discovery Neighborhood approximately 0.5 miles south of the State Route 78/Twin Oaks Valley Road intersection. The property is bounded by Rush Drive to the east, Craven Road to the south, Echo Lane to the west, and the proposed Discovery Street extension to the north (Figure 2, Vicinity Map). Regional access to the site is provided by State Route 78, which traverses the northern portion of the HCSP area and links Interstate 5 to Interstate 15. Interstate 15 is located approximately 3 miles east of the site.

5. Project sponsor's name and address:

Kaiser Foundation Hospitals
1 Kaiser Plaza
Oakland, California 94612

6. General plan designation:

The City's General Plan shows the entire project site as being located within the City's Heart of the City Specific Plan (HCSP) area and designates the site as Specific Plan Area (SPA) in the General Plan's Land Use Element. The HCSP is a comprehensive planning document that establishes development guidelines for the project site, and would be the primary land use, policy, and regulatory document for the project by providing a development planning review process, as authorized by California Government Code Section 65450, in conjunction with the City of San Marcos Zoning Ordinance, Chapter 20.535. Within the HCSP, both of the proposed project parcels are included in a 36-acre subarea designated as Hospital Complex (HC), which allows for the development of up to 1,335,000 square feet (sf) of medical and administrative offices, hospital facilities and accessory uses incidental to operation of the hospital complex (City of San Marcos 2013). The HCSP calls for the development of campus-like medical facilities with a secure outdoor environment, inviting public spaces, well-defined points of entry, landscaping, screened outdoor storage and other development standards for the project site.

7. Zoning:

The City has zoned both parcels in the project site as SPA.

8. Planning Background

1988 Heart of the City Specific Plan

In January 1988, the City adopted the Heart of the City Specific Plan (GPA 09-87, SP29-87) to address the development of approximately 1,570 acres comprised of portions of three planning areas: the Barham/Discovery, Richmar, and Richland community plan areas. The HCSP was conceived when the California State University Board of Trustees selected San Marcos as the site for an adjunct campus to San Diego State University (SDSU). This selection prompted the City to consider the possibility of creating a governmental, educational, and corporate center to serve as a focal point in the community through a Specific Plan for the CSU campus vicinity. The Specific Plan would ensure land use compatibility, adequate public services, and an adequate circulation system. The HCSP included a "Town Center" having mixed-use off/commercial development compatible with the California State University San Marcos.

An EIR was prepared for the HCSP and certified by the City in 1987 (HCSP Final EIR No. 06-87/SCH No. 8702926). A copy of this document is available for public inspection at the City of San Marcos Planning Department, 1 Civic Center Drive, San Marcos, California 92069. The information contained in the HCSP Final EIR is hereby incorporated by reference into this document.

The HCSP originally designated the approximately 40-acre project site as Business Park (BP). Land to the north was also designated BP.

1992 Kaiser Permanente Medical Center

Kaiser Foundation Hospitals proposed a Specific Plan Amendment to the HCSP to allow for the development of the project on the 40-acre site that was originally designated as BP. The project included the development of a 439-bed hospital and affiliated medical offices to provide convenient medical services for Kaiser Permanente medical care members in the north San Diego County area. The project was to be constructed in three phases, with an ultimate buildout size of approximately 1,335,000 sf and a maximum

elevation of seven floors (125 feet), including the basement. The 1992 project also included the construction of a central utility plant on the north side of the site that would house boilers, chillers, and generators serving the medical center. All long-term parking was to be accommodated in an aboveground parking structure located on the west side of the site, and short-term parking for emergency vehicles and visitors was to be located in the northeast portion of the site. Access driveways to the hospital complex were envisioned to be provided along both Craven Road and “B” Street (now called Rush Street) during phases 1 and 2, and a future entrance to the north from Discovery Road, was to be provided during Phase III. The area between the medical center, the hospital, and the parking structure was envisioned to provide pedestrian access, a plaza, outdoor dining for the cafeteria, several seating areas, landscaping and possible water features and/or art sculptures.

The project required approval of a Specific Plan Amendment, a General Plan Amendment, a Rezone, a Development Agreement (Ordinance 92-945), a Site Development Plan and a Boundary Adjustment. The Specific Plan Amendment redesignated and rezoned the 40-acre project site as Hospital Complex (HC) in the HCSP, which is a designation that allows for medical offices and hospital uses.

Tiering off the 1988 HCSP EIR, a Supplemental Environmental Impact Report (SEIR) was prepared and adopted by the City in 1992 (Kaiser Permanente 1992) (SCH No. 92011057) to evaluate the environmental impacts of the Specific Plan Amendment. A copy of this document is available for public inspection at the City of San Marcos Planning Department, 1 Civic Center Drive, San Marcos, California 92069. The information contained in the 1992 Supplemental EIR is hereby incorporated by reference into this document.

9. Surrounding land uses and setting (Briefly describe the project’s surroundings):

The 16-acre project site and surrounding area is largely characterized as an urban, developed commercial and residential area (see Figure 3, Existing Conditions). The areas surrounding the project site to the west, south and east have undergone development and have existing commercial and residential uses. The project site is immediately bordered by neighborhood commercial and office/professional uses to the east, the existing MOB’s and surface parking lots of the existing Kaiser Permanente Medical Campus to the south, single family residential uses in the Discovery Meadows neighborhood to the west, and the soon-to-be developed Discovery Village South Specific Plan Area to the north and north east. The Discovery Village South Specific Plan encompasses the area located directly north of the project site and will include the development of up to 230 single-family homes and the completion of a missing segment of Discovery Street.

The 16-acre project site consists of open, undeveloped land and a portion of the Campus parking facilities (on grade asphalt parking lots). The southern part of the proposed project site is currently an asphalt-paved parking lot. There is a drainage basin just north of a portion of the parking lot. There are no existing uses within the remaining area of the proposed project site. Since the majority of the project site is largely paved, vegetation within this parcel is limited to ornamental drought tolerant landscaping associated with the existing medical campus and ornamental trees that currently buffer the site from adjacent residential and commercial uses to the east and west. The northern portion of the project site is disturbed and primarily vacant. Vegetation on this parcel includes various plants including disturbed forms of Coastal Sage Scrub, Southern Tar Plant, Orcutt’s Brodiaea, Annual Brome Grassland, and Ruderal land cover. There is also a brow along the eastern boundary of this parcel, which may contain a disturbed wetland.

Approximately 481 employees currently work at the existing MOB’s on the medical campus. The total building square footage developed by 2013 was 231,170 sf. Frontage road and intersection improvements

to Craven Road and Rush Drive have also been completed including a driveway as well as the installation of infrastructure such as drainage channels, sewer and water utilities. The project site also currently has 1,161 existing surface parking spaces on the campus.

Typical residential development in the area ranges from one to three stories in height. Most of the surrounding commercial structures are one to three stories in height. Existing light sources come from both the existing medical campus and from surrounding commercial and residential uses.

Primary access to the existing Kaiser Permanente Medical Campus is provided from Craven Road, and secondary access is provided from both Rush Drive and Echo Lane. The project site currently has 1,161 parking spaces in three surface parking lots.

10. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The purpose of this Initial Study (IS) Checklist is to evaluate the analysis presented in the 1992 Supplemental EIR, in light of the changes proposed, by answering the following:

- Does the project have substantial changes being proposed which will require major revisions of the 1992 SEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?
- Have substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous 1992 SEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- Has new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 1992 SEIR was certified as complete shows any of the following:
 - The project will have one or more significant effects not discussed in the 1992 SEIR.
 - Significant effects previously examined will be substantially more severe than shown in the 1992 SEIR.
 - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative; or
 - Mitigation measures or alternatives which are considerably different from those analyzed in the 1992 SEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This IS provides a description of how the proposed project differs from the project analyzed in 1992 Supplemental EIR and is prepared in conformance with Section 15162 and 15163 of the CEQA Guidelines (14 CCR 15000 et seq.). The HCSP would be the comprehensive planning document that establishes development guidelines for the project site.

These entitlements would modify the existing project to allow the development of a 428,500 sf, 206-bed, 7-story-plus-basement hospital building, a 26,000 sf Central Utility Plant, and 110 additional surface

parking spaces on the 8-acre project site in the northern half of the existing Kaiser Permanente medical campus, as described in more detail below (see Figure 4, Conceptual Site Plan).

Table 1 is a comparison of the modified project to the project analyzed in the 1992 SEIR.

Table 1. Comparison of the Modified Project with the 1992 SEIR Project

	1992 SEIR Project	Existing + Proposed Project
Hospital Building	439 beds/820,000 sf	206 beds/428,500 sf
MOBs	485,000 sf	231,700 sf actually constructed
Central Plant	30,000 sf	26,000 sf
Employees	4,000 employees	954 employees (481 in existing MOBs and 473 additional with proposed project)

As shown in Table 1, the 1992 SEIR assumed an eventual total buildout of 1,335,000 sf on the medical campus, including 820,000 sf of hospital with 439 beds, 485,000 sf of MOBs, and a 30,000 sf central utility plant. The proposed project would develop 428,500 sf of hospital with 206 beds and a 26,000 sf central utility plant for a total campus buildout of 686,200 sf, including the existing medical center. Thus, implementation of the proposed project would result in a total buildout of 648,800 less sf than assumed in the 1992 SEIR. Specifically, the proposed project would result in a reduced campus buildout of 391,500 less sf of hospital, 253,300 less sf of MOBs, and a 4,000 less sf of central utility plant.

In addition, as shown in Table 1, the 1992 SEIR assumed that approximately 4,000 people would be employed at the medical center upon full buildout. With the implementation of the proposed project, approximately 954 employees would be employed at the medical center (481 employees that currently work at the existing MOBs plus 473 additional employees that would be employed at the proposed hospital building). Specifically, the proposed project would result in 3,527 fewer employees than the project analyzed in the 1992 SEIR. Moreover, with the reduced campus build out and the reduced employment operation, the modified project would generate approximately 17,014 fewer daily trips than the project analyzed in the 1992 SEIR, with 1,113 fewer trips during the AM peak hour and 2,425 fewer trips during the PM peak hour.

Construction of Project Elements

Hospital Building

An approximately 428,500 sf, 125-foot-high hospital building would be constructed in the central area of the project site directly north of the existing MOBs. An ambulance entry would also be constructed to the north of the Hospital Building.

Central Utility Plant

A Central Utility Plant would be constructed to the west of the Hospital Building. The Central Utility Plant would have approximately 26,000 sf of floor space within a footprint of approximately 12,000 sf. The Central Plant would include the installation of electrical distribution equipment, boilers, chillers, pumps, cooling towers, and emergency generators.

Parking Areas

There are currently 1,161 parking spaces on the southern parcel. To park the new hospital facilities, approximately 276 surface parking spaces would be added at the northwest and northeast corners of the southern parcel. An additional 110 surface parking spaces would be added to the northern parcel. 173 spaces will be removed due to the placement of the new Hospital Building and Central Utility Plant. The combined parking provided at the completion of the project in the northern and southern parcels would total 1,376 spaces.

Access Road

A new access road would be constructed from Rush Road in an east/west direction along the north side of the new hospital building. This road would provide ingress and egress to the Emergency Department, the Loading Dock and the Central Utility Plant.

Café/Conference Patio Areas

An outdoor patio seating area would be constructed to support a café on Level 1 of the hospital building. The patio area would be located between the new hospital building and the existing MOB's.

Support Areas

Hospital support areas would be constructed around the exterior of the hospital building and the Central Utility Plant Loading Dock area. These areas would include a 5,200 sf loading dock, a 1,100 sf tech dock, a 700 sf decontamination shower, a 19,000 sf utility yard, a 3,400 sf fuel cells yard, a 5,700 sf emergency generator yard, a 2,400 sf San Diego Gas & Electric Company yard, and a 2,500 sf battery yard.

Infrastructure Improvements

The proposed project would require several infrastructure improvements including infrastructure for utilities, electrical, gas, sewer, storm water drainage facilities, water and communication. Improvements for electrical, gas, sewer, water and communications may take place off site. New infrastructure would include the following storm drain facilities capturing, treating and routing stormwater: storm drain main and lateral piping, inlets, gutters, riprap, swales, storage tanks and treatment Best Management Practices. Utilities servicing the new hospital and support areas would include gas, electric, telecommunication and fuel oil lines. Sewer and water improvements servicing the new hospital and support areas would include sewer main and lateral piping, emergency underground sewage tanks, water main and lateral piping, 40,000-gallon water tank, fire main and lateral piping, a 40,000-gallon fire tank and fire hydrants.

Operations

Once operational, the new hospital building would accommodate approximately 206 beds. Services that would be provided at the hospital would include the following:

- Medical/Surgical, Intensive Care Inpatients
- Perinatal, Labor and Delivery
- Operating Rooms, Prep and Recovery, C-Section

- Interventional Radiology
- Minor Procedures for inpatients ERCP, Cysto, Fluoroscopy
- CT, MRI, Nuclear Medicine, Cardiac Stress Echo, Vascular Lab, General Radiology, and Ultrasound
- Emergency Department Walk-in and Ambulance
- Ancillary Support: Food Service, EVS, Maintenance, Supply Management
- Small amount of Hospital Administration including Admitting, Financial Counseling Services, and Record Maintenance.

A maximum number of 473 additional employees would be employed at medical campus with the implementation of the proposed project.

Primary access for customers would be via the existing eastern site entry at Rush Drive. Secondary entrances to the medical center complex would be at the southern site entries at Craven Road. Ambulance and service deliveries primary access to the site would be via the new service road from Rush Drive, north of the hospital. No proposed right of way changes would be required. The main entry road off Rush Drive would be improved to better align with and provide fire access to the new hospital entry north of the existing MOB 3. Improvements would include: entry road widening, new median, modifications of existing median, and sawcut and repair of existing road.

The Central Utility Plant would provide chilled water, heated hot water, and steam to the hospital. Individual components include three centrifugal chillers, three flexible water tube hot water boilers, five modular steam boilers. Cooling towers and dual cell units would be located outside in the mechanical yard. The outdoor yard would also provide two emergency generators service the new hospital and one existing generator serving the existing MOB building. Additional rooms within the separate building include staff and administration areas, normal and emergency power and telephone equipment rooms. The central utility plant west of the hospital would be screened by a solid screen wall.

The site would be landscaped with water conserving native or adaptive plant materials. Landscape would conform to the requirements of the City of San Marcos Landscape Manual and the HCSP development guidelines. The parking areas will be screened from the surrounding streets with berming, tree and shrub planting.

11. Project entitlements/discretionary actions/permits

The specific requested project entitlements/discretionary actions by the City include an administrative Site Development Permit. The City will also require a grading permit for the proposed grading.

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Additional approvals from other public agencies are included in Table 2.

Table 2. Required Actions and Approvals – Other Public Agencies

Agency	Required Action/Approval
City of San Marcos	Site Development Permit
	Utility Improvement Plan for water, sewer, water quality, drainage, dry utilities, gates, signage, lighting, and road repairs.
	Grading Plan
	Landscaping Plan
San Diego Regional Water Quality Control Board	Stormwater Pollution Prevention Plan
	National Pollutant Discharge Elimination System Construction General Permit (State Water Resources Control Board Order 2009-09-DWQ)
Office of Statewide Health Planning and Development	Construction Permit
Vallecitos Water District	Water & Sewer Assessment
United States Fish and Wildlife Service	Potential Incidental Take Permit under Section 10 of the Endangered Species Act (in the event that the Discovery Village South Specific Plan Project is not constructed first)

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The City has notified the tribes in accordance with Public Resources Code section 21074. To date, tribal consultation has been initiated on September __, 2019. Tribal consultation input will be considered throughout the environmental document preparation process.

2 Initial Study Checklist

As discussed in Section 1 above, a Program EIR for the HCSP was prepared and certified by the City in 1987 (HCSP Final EIR No. 06-87/SCH No. 8702926) to address the development of approximately 1,570 acres comprised of portions of three planning areas: the Barham/Discovery, Richmar, and Richland community plan areas. A Supplemental Impact Report (SEIR) was prepared and adopted by the City in 1992 (Kaiser Permanente Medical Center Final SEIR (SCH No. 92011057)) to evaluate the potential impacts that may result from the adoption and implementation of the proposed Kaiser Permanente Medical Campus. Pursuant to CEQA Guidelines Section 15168, the 1987 EIR was prepared as a Program EIR, which is intended to provide analysis that is more general and anticipates future project refinement and review.

This document serves as the Initial Study (IS)—and provides environmental analysis—for the proposed project, which consists of the modification/further implementation of the previously approved project. The City, as the lead agency for the proposed project, is responsible for preparing environmental documentation in accordance with the California Environmental Quality Act (CEQA) (Pub. Res. Code Section 21000 et seq.) to determine if approval of the discretionary actions requested and subsequent development could have a significant impact on the environment.

This IS has been prepared on behalf of the City and is in conformance with Sections 15162, 15063 and 15064 of the CEQA Guidelines (14 CCR 15000 et seq.). Pursuant to CEQA Guidelines Section 15162, the purpose of the IS Checklist/Environmental Evaluation is to identify if there are any new or substantially more severe significant impacts associated with the proposed project that would trigger the need for a Supplemental EIR.

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines to determine if the project may have a significant effect on the environment.

Environmental Factors Potentially Affected

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND or MND or previously certified EIR adequately discusses the potential impacts of the project without modification.
- ☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND, MND or previously certified EIR adequately discusses the potential impacts of the project; however, minor changes require the preparation of an ADDENDUM.
- ☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND, MND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new potentially significant environmental effects or substantial increases in the severity of previously identified significant effects are clearly reduced to below a level of significance through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT MND is required.
- ☒ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous environmental document due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However, only minor changes or additions or changes would be necessary to make the previous EIR adequate for the project in the changed situation. Therefore, a SUPPLEMENTAL EIR is required.
- ☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous environmental document due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT EIR is required.

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A finding of “New Potentially Significant Impact” means that the project may have a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document that cannot be mitigated to below a level of significance or be avoided.
2. A finding of “New Mitigation is Required” means that the project may have a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document and that new mitigation is required to address the impact.
3. A finding of “Less than Significant with Previous Mitigation” means that the project will have a less than significant impact on the environment with the mitigation that was previously identified to address the impact.
4. A finding of “No New Impact/No Impact” means that the potential impact was fully analyzed and/or mitigated in the prior CEQA document and no new or different impacts will result from the proposed activity. A brief explanation is required for all answers except "No New Impact/No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No New Impact/No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No New Impact/No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
5. A finding of “Reduced Impact” means that a previously infeasible mitigation measure is now available, or a previously infeasible alternative is now available that will reduce a significant impact identified in the previously prepared environmental document.
6. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
7. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analyses Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis. Describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the proposed action.
 - c. Infeasible Mitigation Measures. Since the previous EIR was certified or previous ND or MND was adopted, discuss any mitigation measures or alternatives previously found not to be feasible that would in fact be feasible or that are considerably different from those previously analyzed and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.
 - d. Changes in Circumstances. Since the previous EIR was certified or previous ND or MND was adopted, discuss any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause a change in conclusion regarding one or more effects discussed in the original document.

8. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
9. Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
10. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
11. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question;
 - b. differences between the proposed activity and the previously approved project described in the approved ND or MND or certified EIR; and
 - c. the previously approved mitigation measure identified, if any, to reduce the impact to less than significance.

2.1 Aesthetics

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

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

No New Impact. Aesthetics was analyzed in the Section 3.2, Landform Alteration/Visual Quality, of the 1992 SEIR. The City's General Plan does not identify any designated scenic vistas; however, the General Plan

more generally aims to protect the City's scenic resources such as the San Marcos, Merriam, and Double Peak Mountains, creek corridors, mature trees, rock outcroppings, and ocean views. The project site and surrounding valley terrain are encompassed by mountains to the east and south that provide opportunities for elevated vantage points offering long and broad views, which may include views of the project site. However, the proposed project would appear to be an extension of the existing MOB's on site. Additionally, the 1992 SEIR determined a hospital building with a maximum height of 125 feet plus appurtenant structures would not have a substantial adverse effect on views. The proposed project would not exceed 125 feet in height, not including appurtenant structures. In 2008, the Ridgeline Protection and Management Overlay Zone was adopted by the City of San Marcos to protect natural viewsheds and minimize impacts to ridgelines; however, the proposed project site is not located in the Ridgeline Overlay Zone. Therefore, no new impact would occur.

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

No New Impact. The project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2011). The project site also is not viewable from Highway 78. Therefore, the proposed project would not substantially damage scenic resources including, but not limited to, trees rock outcroppings, and historic building within a state scenic highway. No new impact would occur.

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

No New Impact. As mentioned, landform alteration and visual quality were analyzed in the 1992 SEIR, which determined that no significant impacts would occur. Per 2018 updates to the CEQA Guidelines, potential impacts to visual quality no longer apply to projects proposed in urbanized areas. CEQA Statute 21071 defines an "urbanized area" 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 of July 1, 2018, the US Census Bureau estimated the population of San Marcos to be 96,847 persons (USCB 2018). While this is less than 100,000 persons, the City of San Marcos is contiguous with the City of Escondido, which has an estimated population of 152,213 persons as of July 1, 2018 (USCB 2018). The combined estimated population of these two contiguous cities is would be 249,060 persons, which is well over the 100,000 persons threshold. Thus, the City of San Marcos would be considered an urbanized area per CEQA Statute 21071.

The proposed project would not conflict with the current SPA zoning. The project site does not have any existing zoning related to scenic quality, such as a scenic overlay zone. The proposed project is located within the HCSP area and would be subject to the HCSP development guidelines governing the visual character and aesthetics of future development of the project site. Therefore, no new impact would occur.

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

No New Impact. The project would introduce new sources of lighting to the existing medical center site, similar to existing lighting on site. Parking would be lit with fixtures that cast down on to the parking and driving surfaces. The lights would feature cut-off capability to limit any spill on to adjacent properties. Pedestrian walkways would be lit to provide a safe environment to navigate the site at night. Site lighting will be provided per the requirements of the City of San Marcos municipal code and HCSP development guidelines. Therefore, no new impact would occur.

2.2 Agriculture and Forestry Resources

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

No New Impact. The 1992 SEIR did not identify impacts related to the loss of Farmland. A portion of the northeast corner of the project site is located within an area designated as Farmland of Local Importance according to the Farmland Mapping and Monitoring Program (FMMP) (DOC 2018). However, the project site is not zoned for agricultural use and this Farmland of Local Importance extends north into the approved Discovery Village South Specific Plan Area, leaving only a small portion on the project site. This would preclude the project site from any potential future agricultural operations due to the small size, location in a highly urbanized area, and adjacency to incompatible land uses. Furthermore, the project site is not located on or adjacent to land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the FMMP, and the City's General Plan does not identify property for farmland importance. Therefore, no new impact would occur.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No New Impact. The project site is not zoned for agricultural use or designated as land under the Williamson Act (DOC 2013). No new impact would occur.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

No New Impact. The project site is not zoned for forest land or timberland production. No new impact would occur.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

No New Impact. As previously described, the proposed project site is not zoned for forest land, and therefore would not result in the loss or conversion of forest land. No impact would occur.

- e) **Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No New Impact. The proposed project would be an extension of the existing medical center on site, which is located in a highly urbanized area. While there is a small portion of Farmland of local importance in the northeast corner of the project site, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance exists on or adjacent to the project site, or in the general vicinity of the project site. The project site is also not zoned for forest land or timberland production, nor is the project site adjacent to land zoned for such uses. Therefore, the proposed project would not involve other changes to the existing environment that would result in the conversion of such Farmland to non-agricultural use or forest land to non-forest use. Therefore, no new impact would occur.

2.3 Air Quality

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

Less than Significant Impact with Previous Mitigation. Air Quality Impacts were analyzed in Section 3.4, Air Quality, of the 1992 SEIR. As discussed therein, the 1992 SEIR project would result in both short-term and long-term air quality impacts. Short-term impacts would occur during construction due to dust generation and construction vehicular emissions and long-term impacts would occur from project-related vehicular and stationary source emissions. However, mitigation was provided in the 1992 SEIR to reduce all potentially significant air quality impacts to less-than-significant levels. Mitigation included construction dust abatement, construction traffic management, and completion of all grading prior to the hospital begins accepting patients. As site grading would occur with implementation of the proposed project, this mitigation

would still be applicable. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that air quality impacts would remain less than significant. Thus, the proposed project would not conflict with or obstruct implementation of applicable air quality plans.

Additionally, the 1992 SEIR assumed an eventual total buildout of 1,335,000 sf, including 820,000 sf of hospital with 439 beds, 485,000 sf of MOB, and a 30,000 sf central utility plant. The proposed project would develop 428,500 sf of hospital with 206 beds and a 26,000 sf central utility plant for a total campus buildout of 686,200 sf, including the existing medical center. Thus, implementation of the proposed project would result in a total buildout of 648,800 less sf than assumed in the 1992 SEIR. Specifically, the proposed project would result in 391,500 less sf of hospital, 253,300 less sf of MOB, and a 4,000 sf smaller central utility plant. Moreover, the project site footprint is the same as what was analyzed in the 1992 SEIR. Therefore, due to the reduced campus buildout and same project footprint, impacts would be the same or less than what were analyzed in the 1992 SEIR.

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

Less than Significant Impact with Previous Mitigation. The 1992 SEIR identified cumulative impacts to air quality due to construction activities and vehicular emissions. However, adherence to previously prescribed mitigation would ensure that cumulative air quality impacts would remain less than significant. Moreover, for the reasons discussed in threshold (a) above, no new impact would result from implementation of the proposed project.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?***

Less than Significant Impact with Previous Mitigation. As discussed, the 1992 SEIR project would result in both short-term and long-term air quality impacts. However, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Moreover, for the reasons discussed in threshold (a) above, no new impact would result from implementation of the proposed project.

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

Less than Significant Impact with Previous Mitigation. As discussed, the 1992 SEIR project would result in stationary source emissions. However, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that the proposed project would not result in other emissions adversely affecting a substantial number of people. Moreover, for the reasons discussed in threshold (a) above, no new impact would result from implementation of the proposed project.

2.4 Biological Resources

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
IV. BIOLOGICAL RESOURCES – Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Potentially Significant Impact. A biological survey of the project site was conducted by P&D Technologies in April 1992. The 1992 SEIR determined that no sensitive plant or animal species were on site. The 1992 SEIR also determined that due to the massive disturbance of the site, the lack of native plant species and habitat, and the ongoing surrounding urban development, the site was not expected to support sensitive or significant biological resources.

Although the site has already been developed, there is potential that a pair, or pairs, of coastal California gnatcatcher are present in the undeveloped open space north of the project site. At the time this Initial Study was prepared, Dudek biologists were in the process of conducting focused surveys in order to determine presence/absence of the California gnatcatcher. As such, impacts to special-status species are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Potentially Significant Impact. The 1992 SEIR determined that project site consisted of non-native grassland and disturbed areas. The non-native grassland was dominated by weedy non-native species (i.e., wild oats and filaree), which do not compose a diverse, high quality habitat. Disturbed areas were either bare or dominated by Russian thistle.

There is potential that sensitive vegetation communities (i.e., disturbed coyote brush) are present on site, and impacts would require mitigation. The proposed project has the potential to result in disturbance of sensitive vegetation communities. Thus, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

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

Potentially Significant Impact. The 1992 SEIR did not identify potential impacts to jurisdictional waters. However, jurisdictional waters could be present within the project site or surrounding area. As such, because the potential for wetland or non-wetland water features to be present on site is unknown at this time, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

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

Potentially Significant Impact. The 1992 SEIR did not identify potential impacts to wildlife corridors. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Due to the lack of decent canopy coverage and/or other topographic features that typically facilitate wildlife movement (e.g., ridgelines) within the project area, the primary use of the

undeveloped portions of the project is expected to be forage and dispersal use by urban-tolerant species with breeding limited to avian species. Implementation of the project is not expected to interfere with connectivity to off-site habitats or adversely affect the local long-term survival of resident or migratory wildlife species. Nonetheless, because the project site provides some suitable habitat for wildlife species, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

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

Potentially Significant Impact. The 1992 SEIR did not identify potential conflicts with the City's policies or ordinances protecting biological resources. The proposed project is not expected to result in conflicts with any local policies or ordinances protecting biological resources, including a tree preservation policy; however, further analysis is required in order to determine significance of the impact. Therefore, impacts are considered **potentially significant** and this topic will be discussed and analyzed in the SEIR.

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

Potentially Significant Impact. The 1992 SEIR did not identify any inconsistencies with any local, regional, or state habitat conservation plans. The project would be required to conform to the goals and policies in the City of San Marcos General Plan. The City is no longer an active participant in the Natural Community Conservation Plan (NCCP) program under the Multiple Habitat Conservation Program (MHCP) conservation planning efforts. However, the City continues to pursue the goals of the MHCP, including habitat and species conservation and habitat connectivity. As such, the design of the project has made use of MHCP conservation planning maps, and sensitive habitats have been considered to include those designated as such under the MHCP. In addition, habitat mitigation ratios have been identified to be consistent with those outlined in the MHCP. Because the project site provides some sensitive vegetation communities and suitable habitat for wildlife species, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

2.5 Cultural Resources

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
V. CULTURAL RESOURCES – Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

No New Impact. Based on a historical/archaeological literature review and field survey that was conducted by Gallegos & Associates in May 1992, the 1992 SEIR determined that the results were negative and cultural resources would not be adversely impacted by construction of the proposed Kaiser Permanente facility. Because historical resources are not present on the project site, and the site has since been developed with four MOBs, impacts are considered **less than significant**. This topic will not be discussed and analyzed in the SEIR.

- b) **Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

Potentially Significant Impact. Although the 1992 SEIR determined that impacts to cultural resources would not occur, as part of preparation of this Initial Study and forthcoming SEIR, AB 52 consultation has been initiated and Native American Tribes have been contacted. Tribal consultation input will be considered throughout the environmental document preparation process. Additionally, at the time this Initial Study was prepared, Dudek archaeologists were in the process of evaluating the project site for the presence/absence of cultural resources and were preparing a cultural resources report. Pending the results of AB 52 consultation and Dudek site evaluation, impacts to archaeological resources are unknown and the proposed project could result in disturbance of unidentified archaeological resources. Therefore, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR and the cultural resources report will be provided in the SIER.

- c) **Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

Potentially Significant Impact. The 1992 SEIR did not evaluate potential impacts associated with disturbance to human remains. Although it is not anticipated, the proposed project could result in disturbance of unidentified human remains, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

2.6 Energy

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
VI. Energy – 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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?**

No New Impact. The 1992 SEIR did not identify potential impacts to energy. However, since energy efficiency was a recognized topic in 1992, the impacts in this regard of the 1992 SEIR project are assumed as part of the baseline for the purposes of analyzing, pursuant to CEQA Guidelines Section 15162, whether the proposed project would result in new or substantially greater significant impacts. Since 1992, substantial advances in energy efficiency, such as with internal combustion engines, building cooling and heating (see, e.g., Title 24 building energy efficiency standards), and with electrical equipment, means that the amount of energy necessary to construct and run the proposed project today would be much less than what would have occurred under the 1992 SEIR. Furthermore, the proposed project's central energy plant would be 4,000 square feet smaller than what was proposed in the 1992 SEIR, further decreasing the level of energy impacts from that assessed in the 1992 SEIR. Thus no new or substantially greater significant impacts would occur.

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

No New Impact. The 1992 SEIR did not identify potential conflicts to renewable energy plans, to energy. However, since energy efficiency was a recognized topic in 1992, the impacts in this regard of the 1992 SEIR project are assumed as part of the baseline for the purposes of analyzing, pursuant to CEQA Guidelines Section 15162, whether the proposed project would result in new or substantially greater significant impacts. The proposed project would comply with Title 24 building energy efficiency standards, and with the energy efficiency regulations and requirements promulgated pursuant to the Scoping Plan by the California Air Resources Board for the purposes of combating global climate change. Thus no new or substantially greater significant impacts would occur.

2.7 Geology and Soils

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
VII. GEOLOGY AND SOILS – Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No New Impact. Geology and Soils were analyzed in Section 3.7, Geology, of the 1992 SEIR. As discussed therein, the project site was not identified to be located within or near a known earthquake fault. Moreover, the project site footprint is the same as what was analyzed in the 1992 SEIR. Therefore, impacts would be the same or less than what was analyzed in the 1992 SEIR. No new impact would occur.

ii) **Strong seismic ground shaking?**

Less than Significant Impact with Previous Mitigation. As discussed in the 1992 SEIR, the project site could be subject to severe ground shaking in the event of a major earthquake; this hazard is common to Southern California and the effects of ground shaking can be minimized by structural design and construction in accordance with applicable codes and standards. Mitigation was provided in the 1992

SEIR to reduce all potentially significant geotechnical impacts to less-than-significant levels. Mitigation included requirements for building foundations and on-site monitoring by the City's Engineering Department during grading and construction. As site grading and construction would occur with implementation of the proposed project, this mitigation would still be applicable. In addition, the proposed project would comply with the latest California Building Code (CBC). Therefore, adherence to previously prescribed mitigation in the 1992 SEIR and compliance with the latest CBC would ensure that geotechnical impacts, including from ground shaking, would remain less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact with Previous Mitigation. As discussed in the 1992 SEIR, the possibility of generalized liquefaction affecting the project site is considered low. However, some localized liquefaction could occur where isolated pockets of saturated uncompacted sandy fill may exist from previous on-site activities. Mitigation was provided in the 1992 SEIR to reduce all potentially significant geotechnical impacts to less-than-significant levels. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that geotechnical impacts, including from liquefaction, would remain less than significant.

iv) Landslides?

No New Impact. As discussed in the 1992 SEIR, there are no deep-seated landslides in the vicinity of the project site. Moreover, the project site footprint is the same as what was analyzed in the 1992 SEIR. Therefore, impacts would be the same or less than what was analyzed in the 1992 SEIR. No new impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact with Previous Mitigation. The 1992 SEIR did not identify substantial soil erosion or the loss of topsoil. However, mitigation was provided in the 1992 SEIR to reduce all potentially significant geotechnical impacts to less-than-significant levels. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that geotechnical impacts, including from liquefaction, would remain less than significant.

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

Less than Significant Impact with Previous Mitigation. The 1992 SEIR did not find the project site to be located on a geologic unit that would become unstable as a result of the project. However, it was identified that some localized liquefaction could occur where isolated pockets of saturated uncompacted sandy fill may exist from previous on-site activities. Mitigation was provided in the 1992 SEIR to reduce all potentially significant geotechnical impacts to less-than-significant levels. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that geotechnical impacts, including from liquefaction, would remain less than significant.

- d) **Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Less than Significant Impact with Previous Mitigation. The 1992 SEIR did not find the project site to be located on expansive soil. However, mitigation was provided in the 1992 SEIR to reduce all potentially significant geotechnical impacts to less-than-significant levels. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that geotechnical impacts, including from liquefaction, would remain less than significant.

- e) **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No New Impact. The proposed project would connect to the existing sewers in the project vicinity and would not utilize septic tanks. No new impacts would occur.

- f) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

No New Impact. The 1992 SEIR did not identify potential impacts to paleontological resources or unique geologic features. As such, the proposed project would not result in any new impacts.

2.8 Greenhouse Gas Emissions

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

No New Impact. The 1992 SEIR did not identify GHG generation impacts. However, since global climate change due to greenhouse gas emissions was a recognized topic in 1992 (see, e.g., *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515) the impacts in this regard of the 1992 SEIR project are assumed as part of the baseline for the purposes of analyzing, pursuant to CEQA Guidelines section 15162, whether the proposed project would result in new or substantially greater significant impacts. With regard to the proposed project, the amount of GHGs

generated would be less than what would have occurred under the 1992 SEIR. This is due to several factors. First, the proposed project would be smaller (by 648,800 sf), resulting in less emissions even if the “emissions per SF” now are assumed to be the same as it would have been in 1992. Second, the GHG emissions rate per SF is now lower than it was in 1992, as Title 24 energy efficiency standards, mpg standards for vehicles, and electrical equipment energy usage standards have all significantly heightened over the past 27 years. Consequently, the proposed project would have less of a GHG generation impact than the 1992 SEIR project, and no further review of this impact is warranted as per CEQA Guideline 15162. Thus, no new or substantially greater significant impact would occur.

b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No New Impact. Refer to 2.8 (a) above. Due to the fact that the proposed project would be subject to the various GHG emissions reduction measures that have been implemented over the past 27 years at the state and local level, it would have less of an impact with regard to conflicting with GHG emissions reduction plans, policies, or regulations than what would have occurred under the 1992 SEIR. Thus, no new or substantially greater significant impact would occur, and no further review of this impact is warranted as per CEQA Guideline 1562.

2.9 Hazards and Hazardous Materials

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No New Impact. Hazards and Hazardous Materials were analyzed in Section 3.8, Public Safety, of the 1992 SEIR. As discussed therein, activities associated with hospitals and medical facilities are governed by numerous statutes and regulations pertaining to the disposal, storage, and transportation of infectious medical wastes and radioactive wastes. Prior to obtaining all necessary licenses and permits for operation, the 1992 SEIR project was required to demonstrate to all regulatory agencies that their policies and procedures for hazardous materials management were in compliance with all applicable regulations. Therefore, the proposed project would be subject to similar requirements, which would ensure that impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. No new impact would occur.

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

No New Impact. As discussed above in response a), the proposed project would result in the disposal, storage, and transportation of infectious medical wastes and radioactive wastes. Therefore, the potential exists for the accidental release of hazardous materials into the environment. Activities associated with hospitals and medical facilities are governed by numerous statutes and regulations. Upon demonstration that hazardous materials management is in compliance with all applicable regulations, impacts would be less than significant. No new impact would occur.

- c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

No New Impact. The project site is located approximately 0.15 miles west of an existing preschool. Additionally, the approved Discovery Village project to the north of the project site would include the development of a school, which could be within 0.25 miles of the proposed project. However, upon demonstration that hazardous materials management is in compliance with all applicable regulations, impacts would be less than significant. No new impact would occur.

- d) ***Would the project be located on a site that 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?***

Less than Significant Impact with Previous Mitigation. As discussed in the 1992 SEIR, a Phase I Preliminary Geotechnical Investigation and Environmental Site Assessment (ESA) was conducted in August 1991 for the project site. The results of the ESA indicated that past activities on the property may have caused soil contamination. Subsequently, a Phase II ESA was conducted in December 1991 and confirmed the existence of contaminated soil on site, which included numerous pesticides and several areas of petroleum hydrocarbons related to previous chicken ranch operations. All contamination was generally located within the top one foot of surface soil. As such, remediation of contaminated areas was required of the 1992 SEIR project. A Phase III ESA was conducted in March 1992 to obtain a more detailed evaluation and delineation of soil contamination. During excavation of contaminated soils in March 1992, laboratory analysis determined that while soils were contaminated, no contaminants were detected at significant concentrations. All contaminated soils identified in the ESAs were then removed and disposed of in the appropriate manner.

Nonetheless, several other areas of potential contamination existed in 1992, as these areas could not be investigated further due to the presence of existing structures on site. Therefore, mitigation was implemented that required the 1992 SEIR project to demonstrate that all potential areas of contamination were identified and remediated and that all contaminated soils were removed and disposed of in accordance with all federal, state, and local ordinances and regulations, prior to the issuance of grading permits. As such, this mitigation was implemented prior to development of the existing medical center.

Mitigation was also provided for the remediation of any contaminated soils encountered during site grading. As site grading would occur with implementation of the proposed project, this mitigation measure would still be applicable. Adherence to this previously prescribed mitigation measure in the 1992 SEIR would ensure that potential impacts related to any encountered contaminated soil during site grading would remain less than significant.

- 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 New Impact. Hazards related to air traffic were analyzed in Section 3.9.4, Air Traffic, of the 1992 SEIR. As discussed therein, P&D Technologies' aviation specialist conducted an evaluation of the project site with respect to safety issues related to aircraft operations. No safety impacts from the McClellan-Palomar airport

were determined to be expected as a result of project implementation as the project site is located outside of the airport's Flight Activity Zone (FAZ) or Airport Influence Area (AIA).

Since 1992 the San Diego County Regional Airport Authority was established to serve as the Airport Land Use Commission (ALUC) for San Diego County. The ALUC is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for sixteen public-use and military airports in San Diego County, including the McClellan-Palomar airport located approximately 5.75 miles west of the project site. The McClellan-Palomar ALUCP was adopted in January 2010. According to this ALUCP, the project site is not located within any Safety Zone or Noise Exposure Range Contour of the McClellan-Palomar airport (San Diego County Regional Airport Authority 2011). As such, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.

Nevertheless, the project site is located within the Review Area 2 of the airport's AIA (San Diego County Regional Airport Authority 2011). Limits on the heights of structures are the only restrictions on land uses within Review Area 2. Additionally, the recordation of overflight notification documents is also required in locations within Review Area 2. Therefore, the proposed project would be required to record overflight notification documents as outlined in the McClellan-Palomar ALUCP, and in accordance with Chapter 20.265 of the City's Municipal Code.

Furthermore, the proposed project is also located within the McClellan-Palomar Part 77 Airspace Protection Zone, which requires noticing to the FAA for projects with structures over 200 feet above ground level. The proposed project would result in a maximum height of 125 feet above ground level and no construction equipment greater than 200 feet would be used. Therefore, the proposed project would not be required to file a notice with the FAA.

Finally, the P&D Technologies study conducted for the 1992 SEIR project also analyzed potential issues with aircraft operations related to helicopter operations at the then-proposed Scripps facility northwest of the project site (Kaiser Permanente 1992). This plan has subsequently been abandoned and the proposed Discovery Village mixed-use project has been approved on this site. Therefore, potential impacts due to helicopter operations from the then proposed Scripps facility no longer apply to the proposed project. Overall, upon recordation of overflight notification documents per the McClellan-Palomar ALUCP's Review Area 2 requirements, impacts would be less than significant and no new impact would occur.

f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

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

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Further, the project site is not located within or adjacent to a Very High Fire Hazard Severity Zone (VHFHSZ) as delineated by the

California Department of Forestry and Fire Protection (CalFire 2009). Additionally, the project site is located in a highly developed area of the City and upon development of the approved Discovery Village Project to the north of the project site, the proposed project would not be adjacent to any wildland areas. Therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires and no new impact would occur.

2.10 Hydrology and Water Quality

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
i) result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

No New Impact. Hydrology and Water Quality were analyzed in Section 3.9.1, Hydrology/Water Quality, of the 1992 SEIR. As discussed therein, the 1992 SEIR did not identify violations with any water quality standards or waste discharge requirements. Additionally, the 1992 SEIR did not determine that the 1992 SEIR project would otherwise substantially degrade surface or groundwater. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, and the project would comply with the latest stormwater and water quality standards, no new impact would occur.

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

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

- c) ***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

- i) ***result in substantial erosion or siltation on or off site;***

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially alter the exiting drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

- ii) ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially alter the exiting drainage pattern of the site or area in a manner which would substantially increase the rate or amount of surface runoff resulting in flooding on or off site. Additionally, the 1992 SEIR determined that runoff volumes from the site could be accommodated in the existing and planned

drainage system. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

- iii) ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially alter the exiting drainage pattern of the site or area in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Additionally, the 1992 SEIR determined that runoff volumes from the site could be accommodated in the existing and planned drainage system. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

- iv) ***impede or redirect flood flows?***

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially alter the exiting drainage pattern of the site or area in a manner which would impede or redirect flood flows. Additionally, the 1992 SEIR determined that no flooding impacts would occur. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

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

No New Impact. The 1992 SEIR did not identify the project site as being located in flood hazard, tsunami, or seiche zones. Thus, the 1992 SEIR project was not determined to risk release of pollutants due to project inundation from being located in such zones. Therefore, no new impact would occur.

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

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

2.11 Land Use and Planning

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XI. LAND USE AND PLANNING – Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project physically divide an established community?

No New Impact. Land Use and Planning were analyzed in Section 3-1, Land Use, of the 1992 SEIR. The proposed project would result in the expansion of an existing medical center and thus would not physically divide an established community. No new impact would occur.

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

No New Impact. As discussed in the 1992 SEIR, the 1992 SEIR project was analyzed for consistency with applicable planning documents including the General Plan, Barham/Discovery Community Plan, and HCSP. The 1992 project was determined to be in conformance with the intent of all of these plans. As previously discussed, the proposed project would result in a reduced campus buildout and would occupy the same project site as analyzed in the 1992 SEIR. In addition, the property is designated as Hospital Complex in the HCSP, which allows for the uses proposed in the project. Therefore, no new impact would occur.

2.12 Mineral Resources

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XII. MINERAL RESOURCES – Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No New Impact. The 1992 SEIR did not identify impacts with regard to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. According to the California Department of Conservation (DOC), the project site is located in an area classified as mineral resources zone MRZ-3 (DOC 1996). Zones classified as MRZ-3 are defined as areas containing mineral deposits, the significance of which cannot be evaluated from available data. Therefore, the project site is not located within an area that contains a known mineral resource. No new impact would occur.

- b) **Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No New Impact. The 1992 SEIR did not identify impacts with regard to 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. The proposed project site is not designated as a locally important mineral resource recovery site on any local general plan, specific plan, or other land use plan (City of San Marcos 2013). Due to the location and the nature of the proposed project as discussed above, there would be no impact to mineral resources. No new impact would occur.

2.13 Noise

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XIII. NOISE – Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact with Previous Mitigation. Noise was analyzed in Section 3.5, Noise, of the 1992 SEIR. As discussed therein, Giroux & Associates prepared a noise technical report, which determined that both short-term and long-term noise impacts would result from implementation of the for the 1992 SEIR project. In the short term, temporary construction noise impacts would occur during site preparation and building assembly. Long-term noise impacts would result from project generated traffic. Additionally, emergency vehicle sirens are associated with medical centers, which could create noise disturbances in the surrounding community. Finally, the proposed project could also result in noise impacts from on-site mechanical equipment such as HVAC equipment and emergency generators.

All project-related noise impacts were determined to be less than significant. Nonetheless, mitigation was provided in the 1992 SEIR to ensure no substantial temporary or permanent increases in ambient noise would result from implementation of the 1992 SEIR project. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that noise impacts would remain less than significant.

Additionally, the 1992 SEIR assumed an eventual total buildout of 1,335,000 sf, including 820,000 sf of hospital with 439 beds, 485,000 sf of MOBs, and a 30,000 sf central utility plant. The proposed project would develop 428,500 sf of hospital with 206 beds and a 26,000 sf central utility plant for a total campus buildout of 686,200 sf, including the existing medical center. Thus, implementation of the proposed project would result in a total buildout of 648,800 less sf than assumed in the 1992 SEIR. Specifically, the proposed project would result in 391,500 less sf of hospital, 253,300 less sf of MOBs, and a 4,000 sf smaller central utility plant. Moreover, the project site footprint is the same as what was analyzed in the 1992 SEIR. Therefore, due to the reduced campus buildout and same project footprint, impacts would be the same or less than what was analyzed in the 1992 SEIR.

- b) **Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

No New Impact. The 1992 SEIR did not identify impacts with regard to groundborne vibration or groundborne noise levels. Therefore, no new impact would occur.

- 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?***

No New Impact. The proposed project is not located within the vicinity of a private airstrip. The project site is located approximately 5.75 miles east of the McClellan-Palomar Airport. According to the ALUCP for the McClellan-Palomar Airport, the project site is not located within the existing or future 60 dB CNEL noise contour of the airport (San Diego County Regional Airport Authority 2011). Therefore, people residing or working in the project area would not be exposed to substantial airport noise. No new impact would occur.

2.14 Population and Housing

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XIV. POPULATION AND HOUSING – 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

No New Impact. The proposed project would result in the expansion of the existing medical facility on site. The 1992 SEIR assumed an eventual total buildout of 1,335,000 sf and the addition of 4,000 employees, whereas the proposed project would result in the eventual total buildout of 686,200 sf and the addition of a maximum number of 473 employees, making for a total of 954 employees on the medical campus with the employees in the existing MOB. This represents a total campus buildout of 648,800 fewer sf and 3,527 fewer employees than originally assumed in the 1992 SEIR. Thus, while the additional employees could result in the relocation of people to the area to fill such jobs, the proposed project would also result in reduced employment generation than anticipated in the 1992 SEIR. Moreover, the project site footprint is the same as what was analyzed in the 1992 SEIR. Therefore, due to the reduced campus buildout, reduced employment generation, and same project footprint, impacts would be less than the project analyzed in the 1992 SEIR.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No New Impact. The 1992 SEIR did not identify impacts with regard to the displacement of people or housing. There is no existing housing on the project site. The proposed project is located on both undeveloped land and the existing medical center site, of which it would expand. Therefore, implementation would not displace any existing housing or people, necessitating the construction of replacement housing elsewhere. No new impact would occur.

2.15 Public Services

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XV. PUBLIC SERVICES					
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Less than Significant with Previous Mitigation. Public Services were analyzed in Section 3.6, Public Services and Facilities, of the 1992 SEIR. Specifically, Fire Protection was addressed in Section 3.6.5 of the 1992 SEIR. As discussed therein, additional development within the San Marcos Fire Department's service area would result in a potentially significant impact with regard to providing adequate service. Additionally, the Fire Department's lack of appropriate equipment to serve structures over three stories was also determined to be a potentially significant impact. Mitigation was provided in the 1992 SEIR to ensure that impacts to fire services would be reduced to below a level of significance, including contributing to a Community Facility District for fire and paramedic services. Therefore, adherence to previously prescribed mitigation in the 1992 SEIR would ensure that impacts to fire services would remain less than significant.

Moreover, the 1992 SEIR assumed an eventual total buildout of 1,335,000 sf, including 820,000 sf of hospital with 439 beds, 485,000 sf of MOBs, and a 30,000 sf central utility plant. The proposed project would develop 428,500 sf of hospital with 206 beds and a 26,000 sf central utility plant for a total campus buildout of 686,200 sf, including the existing medical center. Thus, implementation of the proposed project would result in a total buildout of 648,800 less sf than assumed in the 1992 SEIR. Specifically, the proposed project would result in 391,500 less sf of hospital, 253,300 less sf of MOBS, and a 4,000 sf smaller central utility plant. The 1992 SEIR also assumed higher employment generation due to the larger project buildout. Therefore, due to the reduced campus buildout and reduced employment generation, impacts would be the same or less than what was analyzed in the 1992 SEIR.

Police protection?

No New Impact. Police Protection was analyzed in Section 3.6.4 of the 1992 SEIR. As discussed therein, implementation of the 1992 SEIR project was determined to result in an increased demand for law enforcement services, which would represent a significant impact. However, mitigation was provided in the 1992 SEIR to ensure that impacts to police services would be reduced to below a level of significance, including a contribution to a Mello-Roos or similar funding mechanism prior to the issuance of building permits. As such, mitigation was fulfilled prior to development of the existing medical center, and a Community Facility District has been established for police services. The police services are provided by the San Diego County Sheriff's Department. Additionally, because the proposed project would result in a reduced campus buildout and reduced employment generation, impacts would be the same or less than what was analyzed in the 1992 SEIR. Therefore, no new impact would occur.

Schools?

No New Impact. Schools were analyzed in Section 3.6.6 of the 1992 SEIR. As discussed therein, the 1992 SEIR project could have indirect impacts to schools as it would result in employment generation. A portion of the employees generated by the 1992 SEIR project would be expected to commute to San Marcos from other locations within San Diego County (and possibly southern Orange and Riverside counties) and some employees may be current residents within the San Marcos Unified School District (SMUSD). However, a number of employees would be expected to relocate to the San Marcos area. Therefore, it was determined that implementation of the 1992 SEIR project could result in impacts to schools within the SMUSD. However, mitigation was provided in the 1992 SEIR to ensure that impacts to SMUSD would be reduced to below a level of significance. Mitigation included the contribution to a funding mechanism prior to the issuance of building permits. As such, mitigation would have been fulfilled prior to development of the existing medical center. In addition, school fees would be paid prior to a building permit for proposed project being issued. Additionally, because the proposed project would result in a reduced campus buildout and reduced employment generation, impacts would be the same or less than what was analyzed in the 1992 SEIR. Therefore, no new impact would occur.

Parks?

No New Impact. The 1992 SEIR did not identify any potentially significant impacts to parks. Because the proposed project would result in a reduced campus buildout and reduced employment generation, no new impacts would occur.

Other public facilities?

No New Impact. The 1992 SEIR did not identify any potentially significant impacts to other public facilities. Because the proposed project would result in a reduced campus buildout and reduced employment generation, no new impacts would occur.

2.16 Recreation

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XVI. RECREATION					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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?**

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would result in increased use of existing parks or recreational facilities such that substantial physical deterioration of such facilities would occur or be accelerated. No new impact would occur.

- 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 New Impact. The proposed project does not include recreational facilities and the 1992 SEIR did not identify a need for the construction or expansion of recreational facilities. No impact would occur.

2.17 Transportation

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XVII.TRANSPORTATION – Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

No New Impact. Transportation was analyzed in Section 3.3, Traffic/Circulation, of the 1992 SEIR. As discussed therein, the 1993 SEIR project was determined to result in short-term and long-term impacts to street segments and intersections in the vicinity of the project site. However, both short-term and long-term mitigation were provided in the 1992 SEIR to reduce impacts. Mitigation included preparation of a Traffic Demand Management (TDM) plan, dedication of right-of-ways, construction of roadway and intersection improvements, and fair share contribution towards future intersection and roadway improvements prior to the issuance of occupancy permits. As such, mitigation was fulfilled prior to occupancy of the existing medical center. The 1992 SEIR determined that even with implementation of the recommended mitigation measures, significant unavoidable impacts would remain. No additional mitigation measures were determined to be feasible to reduce impacts any further. However, the proposed project would result in a reduced campus buildout, reduced employment generation, and same project footprint, which would result in the generation of approximately 17,014 fewer daily trips than the project analyzed in the 1992 SEIR, with 1,113 fewer trips during the AM peak hour and 2,425 fewer trips during the PM peak hour. Therefore, impacts would be less than what was analyzed in the 1992 SEIR. Finally, the 1992 SEIR did not identify any conflicts with transit, bicycle, or pedestrian facilities. No new impact would occur.

b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

No New Impact. Per CEQA Guidelines section 15064.3, analysis criteria detailed in this CEQA Guidelines section does not apply until July 1, 2020 unless adopted earlier by the lead agency. The City of San Marcos

has not elected this provision ahead of the standard schedule and therefore, this section does not yet apply. Additionally, the 1992 SEIR did not identify conflicts or inconsistencies with regard to the provisions of CEQA Guidelines section 15064.3, subdivision (b). No new impacts would occur.

- c) ***Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

No New Impact. The 1992 SEIR did not identify impacts with regard to the increase in hazards due to a geometric design feature or incompatible uses of the 1992 SEIR project. Therefore, no new impact would occur.

- d) ***Would the project result in inadequate emergency access?***

No New Impact. The 1992 SEIR did not identify impacts with regard to inadequate emergency access. Therefore, no new impacts would occur.

2.18 Tribal Cultural Resources

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XVIII. TRIBAL CULTURAL RESOURCES					
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), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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:*

- i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

Potentially Significant Impact. The 1992 SEIR did not identify potential impacts to tribal cultural resources. As part of preparation of this Initial Study and forthcoming SEIR, the City has notified the tribes in accordance with AB 52. Tribal consultation input will be considered throughout the environmental document preparation process. Therefore, as consultation with tribes is still ongoing, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

- ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Potentially Significant Impact. The 1992 SEIR did not identify potential impacts to tribal cultural resources. As discussed above, the City has notified the tribes in accordance with AB 52. As consultation with tribes is still ongoing, impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

2.19 Utilities and Service Systems

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project 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?***

No New Impact. Utilities and Service Systems were analyzed in in Section 3.6, Public Services and Facilities, of the 1992 SEIR. Specifically, water facilities were analyzed in Section 3.6.1. As discussed therein, the 1992 SEIR project was determined to result in a potentially significant impact on the Vallecitos Water District's (VWD) existing and planned water distribution facilities. However, mitigation was provided in the 1992 SEIR to reduce potentially significant impacts to less-than-significant levels. Mitigation included preparation of a hydraulic analysis prior to the issuance of a grading permit and payment of fair share contributions towards upgrading impacted water facilities prior to issuance of building permits. As such, mitigation would have been fulfilled prior to development of the existing medical center. Additionally, the proposed project would result in a reduced campus buildout and reduced employment generation. Therefore, no new impact to water facilities would occur.

Sewer facilities were analyzed in Section 3.6.2 of the 1992 SEIR. As discussed therein, the 1992 SEIR project was determined to result in a potentially significant impact on the VWD's existing and planned sewer facilities. However, mitigation was provided in the 1992 SEIR to reduce potentially significant impacts to less-than-significant levels. Mitigation included preparation of a sewer loading analysis prior to the issuance of a grading permit, payment of fair share contributions towards upgrading impacted sewer facilities prior to the issuance of building permits, and obtaining an industrial waste permit. As such, mitigation would have been fulfilled prior to development of the existing medical center. Sewer and water flow studies have been submitted to the Vallecitos Water District for assessment; however, since the proposed project would result in a reduced campus buildout and reduced employment generation no new impacts to sewer facilities are anticipated. Therefore, no new impact to sewer facilities would occur.

Gas and Electric facilities were analyzed in Section 3.6.3 of the 1992 SEIR. As discussed therein, the 1992 SEIR project would result in a potentially significant impact on San Diego Gas & Electric Company facilities. However, mitigation was provided in the 1992 SEIR to reduce potentially significant impacts to less-than-significant levels. Mitigation included the extension of utility lines and other associated infrastructure onto the project site prior to issuance of building permits. As such, mitigation would have been fulfilled prior to development of the existing medical center. Additionally, the proposed project would result in a reduced campus buildout and reduced employment generation. Therefore, no new impact to gas and electric facilities would occur.

Finally, the 1992 SEIR did not identify impacts to storm water drainage or telecommunications facilities. Therefore, no new impacts would occur.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

No New Impact. As discussed in the 1992 SEIR, the 1992 SEIR project was determined to result in cumulative impacts to regional water supply. The proposed project would result in the expansion of the existing medical facility on site; however, the total campus buildout of the proposed project would be 648,800 sf smaller and would employ 3,527 fewer employees than the project analyzed in the 1992 SEIR. Therefore, the proposed project would result in a reduced campus buildout and reduced employment generation, which would result in reduced water consumption. Therefore, no new impact would occur.

c) *Would the project 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?*

No New Impact. As previously discussed, the 1992 SEIR determined that the 1992 SEIR project would result in a potentially significant impact on the VWD's existing and planned sewer facilities. However, mitigation was provided to reduce impacts to less-than-significant levels. Additionally, the proposed project would result in a reduced campus buildout and reduced employment generation. Therefore, no new impact to wastewater treatment facilities would occur.

d) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

No New Impact. Solid waste was analyzed in Section 3.6.7 of the 1992 SEIR. As discussed therein, the 1992 SEIR project was not determined to result in impacts to solid waste facilities at a project level, 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. However, the 1992 SEIR was determined to result in a cumulative impact to solid waste facilities. Thus, mitigation was provided in the 1992 SEIR to reduce potentially significant cumulative impacts, which included the implementation of a recycling program prior to issuance of building permits. As such, mitigation was fulfilled prior to development of the existing medical center. Additionally, the proposed project would result in a reduced campus buildout and reduced employment generation. Therefore, no new impact to solid waste facilities would occur.

- e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would conflict with federal, state, or local management and reduction statutes and regulations related to solid waste. Therefore, no new impact would occur.

2.20 Wildfire

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would substantially impair an adopted emergency response plan or emergency evacuation plan. As the proposed project would result in a reduced campus buildout and reduced employment generation within the same project site, no new impact would occur.

- b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would exacerbate wildfire risks due to slope, prevailing winds, or other factors, thereby exposing project occupants to pollutant concentrations from a wildfire or from the uncontrolled spread of a wildfire. Therefore, no new impact would occur.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of associated infrastructure. Additionally, utility infrastructure has already been extended to the project site from development of the 1992 SEIR project. Therefore, no new impact would occur.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No New Impact. The 1992 SEIR did not determine that the 1992 SEIR project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no new impact would occur.

2.21 Mandatory Findings of Significance

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE					
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	New Mitigation is Required	Less than Significant Impact with Previous Mitigation	No New Impact/No Impact	Reduced Impact
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. As discussed in Section 2.1, Biological Resources, the proposed project has the potential to impact sensitive vegetation communities and habitat for special-status wildlife. Further, as discussed in Section 2.2 and 2.3, the proposed project could result in potentially significant impacts to cultural resources, including tribal cultural resources. Impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

- 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)?***

Potentially Significant Impact. The 1992 SEIR did not identify potential cumulative impacts to biological resources, cultural resources or tribal cultural resources. This topic will be discussed and analyzed in the SEIR though and impacts are considered potentially significant.

- c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Potentially Significant Impact. As evaluated in this Initial Study, the proposed project could result in impacts to Biological Resources, Cultural Resources, and Tribal Cultural Resources. Impacts are considered **potentially significant**. This topic will be discussed and analyzed in the SEIR.

3 References and Preparers

3.1 References Cited

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3.2 List of Preparers

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Joe Harrison, Environmental Analyst

Andrew Greis, GIS Technician

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SOURCE: SANGIS 2017, 2019

DUDEK



0 100 200 Feet

FIGURE 2
Vicinity Map

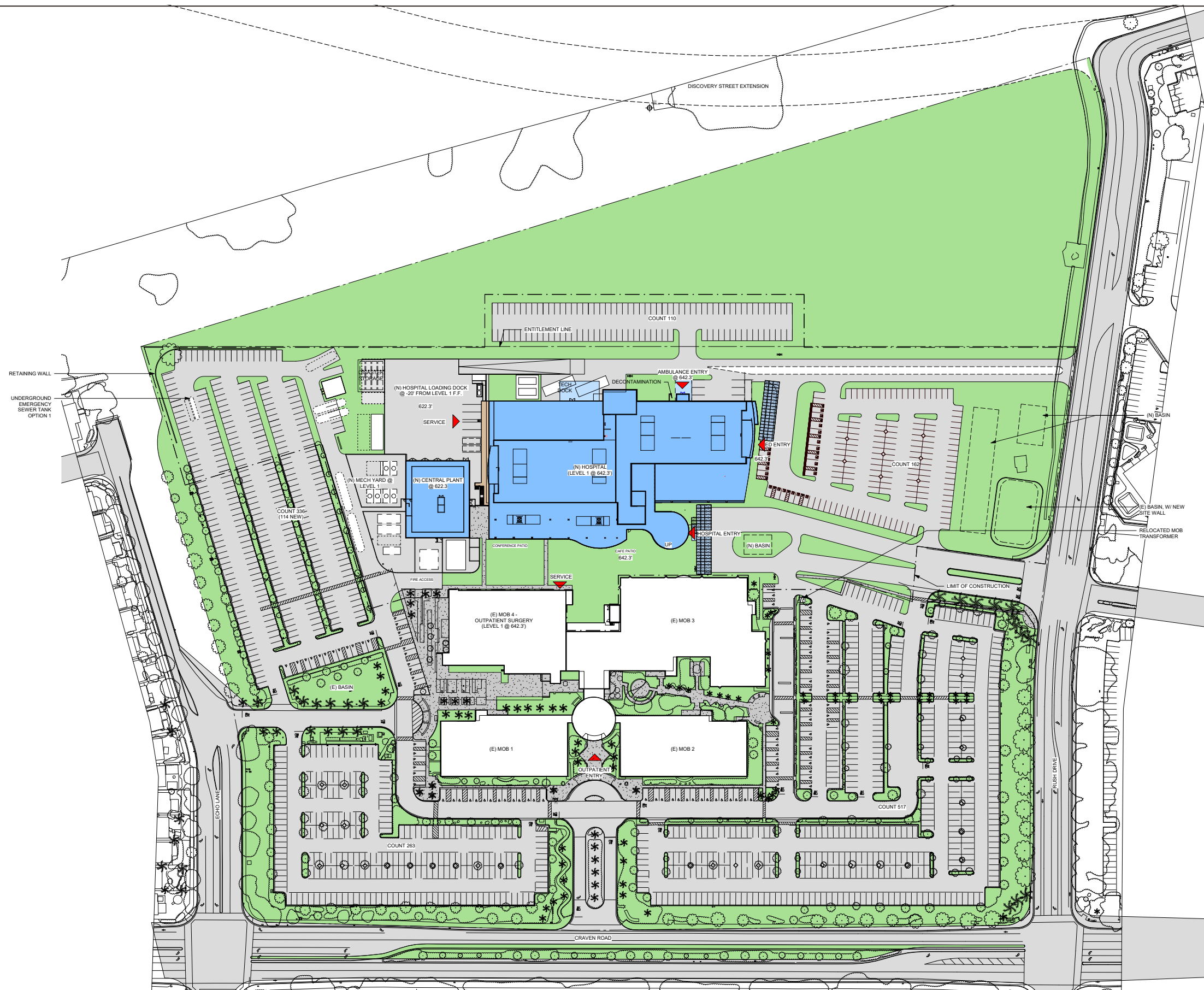
Kaiser Permanente Medical Center Project

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SOURCE: SANGIS 2017, 2019

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SOURCE: Kaiser Permanente, 2019

FIGURE 4

Conceptual Site Plan
Kaiser Permanente Medical Center Project

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