

Appendix A

NOP/IS, Public Scoping Comments



March 28, 2019

Date: April 01, 2019

Subject: Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting

Project: Sunrise Specific Plan

Project Numbers: SP18-0002, PZ18-0001, R18-0002, GPA18-0002, TSM18-0001, MFSDP 18-0001, CUP18-0006, and GV18-0001

Lead Agency: City of San Marcos

Applicant: The Sunrise Gardens Project Owner, LLC

Pursuant to Section 15082(a) of the California Environmental Quality Act (CEQA), the City of San Marcos (City) will be the lead agency responsible for preparing an Environmental Impact Report (EIR) for the subject project. Consistent with the agency's statutory authority, the City requests input regarding the scope and content of the EIR. The City has concluded that the project could result in potentially significant environmental impacts and therefore an EIR is required. The project description and location are included herein.

Pursuant to Section 15103 of the CEQA Guidelines, response must be sent at the earliest date and received by our agency no later than thirty (30) days after receipt of this notice. All comments must be received by the City by 5:30 p.m. on **May 2, 2019**. Please provide your written response to:

Susan Vandrew Rodriguez, Associate Planner
City of San Marcos Planning Division
1 Civic Center Drive
San Marcos, CA 92069
Email: svandrew@san-marcos.net

For more information regarding the proposed project, please visit:

<https://www.sanmarcos.net/departments/development-services/planning/environmental-review-sustainability/environmental-documents> or contact Susan Vandrew Rodriguez, Associate Planner, at (760) 744-1050, ext. 3237 or svandrew@san-marcos.net.

Scoping Meeting: A public scoping meeting for the EIR has been scheduled for the project. The intent of the scoping meeting is to obtain information and solicit comments from the public about the

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issues and content of the EIR. Attendance of the scoping meeting is not required in order to submit written comments.

Date: April 10, 2019
Time: 6:30 p.m.
Location: City of San Marcos
1 Civic Center Drive
Valley of Discovery Conference Room (next to City Council Chambers)

Project Location: The approximately 14.4-acre project site is located at the southeastern limits of the City and is comprised of Assessor's Parcel Numbers (APNs) 228-312-09-00 and 228-312-10-00. The project site is currently within portions of two jurisdictions: the City (APN 228-312-09-00, approximately 3.6 acres) and the County of San Diego (APN 228-312-10-00, approximately 10.8 acres); however, the entirety of the project resides within the City's General Plan Sphere of Influence. The site is not currently accessible by a public roadway; however an existing 9 foot wide unimproved road access easement provides site access via E. Barham Drive. Please refer to Figure 1 for the project location.

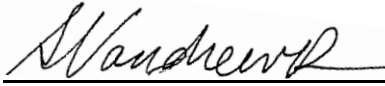
Project Description: The proposed project would involve a development consisting of an Annexation, General Plan Amendment, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit. If approved, these entitlements would allow the development of 192 multi-family units within the project site. The Specific Plan is a comprehensive planning document that establishes development guidelines for the project site. The document will serve as the primary land use, policy, and regulatory document for the project by providing a development planning review process, as authorized by California Government Code §65450, in conjunction with the City of San Marcos Zoning Ordinance, Chapter 20.535. The permitted uses within the project site with adoption of the Specific Plan would be multi-family residential with public and private recreational and open space. The project site plan is shown on Figure 2, Conceptual Site Plan.

The proposed project would allow for the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. The proposed residential units would be comprised of 100 two-story townhomes and 92 three-story townhomes. The proposed project also includes open space, active recreational areas, bio-retention areas, circulation improvements, and a public services and facilities plan.

The proposed project would require several off-site improvements including storm drainage facilities, roadway network construction, and sewer improvements.



Potential Environmental Effects: Pursuant to CEQA Section 15060(d) of the CEQA Guidelines, the project may result in significant impacts related to: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Energy. An EIR will be prepared to evaluate the proposed project's potential impacts on the environment, outline mitigation measures, and analyze potential project alternatives.

Signature:  **Date:** March 28, 2019

Susan Vandrew Rodriguez, Associate Planner

Attachments: Figure 1, Project Location
Figure 2, Conceptual Site Plan



FIGURE 1

Project Location

Sunrise Specific Plan Notice of Preparation

Initial Study for the Sunrise Specific Plan

Prepared for:

City of San Marcos

Development Services Department, Planning Division

1 Civic Center Drive

San Marcos, California 92069

Contact: Susan Vandrew Rodriguez, Associate Planner

Prepared by:

DUDEK

605 Third Street

Encinitas, California 92024

Contact: Brian Grover, Project Manager

APRIL 2019

Initial Study for the Sunrise Specific Plan

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1 INITIAL STUDY CHECKLIST

1. Project title:

Sunrise Specific Plan

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:

Susan Vandrew Rodriguez, Associate Planner
760.744.1050 ext. 3237

4. Project location:

The approximately 14.4-acre project site is located at the southeastern limits of the City of San Marcos (City) and is comprised of Assessor's Parcel Numbers (APNs) 228-312-09-00 and 228-312-10-00. The project site is currently within portions of two jurisdictions: the City (APN 228-312-09-00, approximately 3.6 acres) and the County of San Diego (APN 228-312-10-00, approximately 10.8 acres); however, the entirety of the project resides within the City's General Plan Sphere of Influence. Please refer to Figure 1 for the project location.

The project site is currently vacant, with areas disturbed from previous agricultural uses. The site is not currently accessible by a public roadway; however, an existing 9-foot wide unimproved road access easement provides site access via E. Barham Drive.

5. Project sponsor's name and address:

The Sunrise Gardens Project Owner, LLC
2235 Encinitas Boulevard #216
Encinitas, California 92024

6. General Plan designation:

The southern parcel of the project site (APN 228-312-10-00) is designated as Semi-Rural Residential (SR-1) by the County of San Diego General Plan which allows for residential development at a maximum density of one dwelling unit per 2, 4, or 8 gross acres (du/ac) (County of San Diego 2011). This parcel is also within the City's General Plan Sphere of Influence (SOI) and is designated as Light Industrial (LI) which allows for light

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manufacturing, processing, assembly, wholesale, office, and research and development laboratories, as well as supporting uses, such as office, limited retail, and business services. The northern parcel of the project site (APN 228-312-09-00) is designated as Low Density Residential (LDR) which allows for a density of 4.1 to 8.0 du/ac and a mixture of single-family and duplex residential development, including detached condominiums, clustered homes, courtyard housing, and residential manufactured home parks.

7. **Zoning:**

The County of San Diego has zoned the southern parcel of the project site (APN 228-312-10-00) as Single Family Residential (RS). The City's existing zoning for the northern parcel of the project site (APN 228-312-09-00) is Residential Manufactured Home Park (R-MHP).

8. **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 proposed project would involve entitlement processing of an Annexation, General Plan Amendment, Prezone, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit. If approved, these entitlements would allow the development of a planned residential community within the project site. The Specific Plan is a comprehensive planning document that establishes development guidelines for the project site. The document will serve as the primary land use, policy, and regulatory document for the project by providing a development planning review process, as authorized by California Government Code §65450, in conjunction with the City of San Marcos Zoning Ordinance, Chapter 20.535. The permitted uses within the proposed project site consist of multi-family residential, circulation and storm water infrastructure, and open space/active recreation.

The proposed project would allow for the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. The proposed residential units would be comprised of 100 two-story townhomes and 92 three-story townhomes. The proposed project also includes 6.2 acres of open space, including active recreational areas such as a pool area, recreational facilities, tot lots, and barbeque stations; approximately 0.3 acres of bio-retention areas; private internal circulation improvements, such as internal driveways, alleys, and connections to East Barham Drive and Meyers Avenue; and a public services and facilities plan, included as part of the Specific Plan in order to provide a safe, healthy, and well-rounded community. The project site plan is shown on Figure 2.

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The proposed project would require several off-site improvements including storm drainage facilities, roadway network construction, and sewer improvements. Access to the project site would occur from Meyers Avenue and E. Barham Drive, providing primary and secondary gated ingress/egress points, respectively. The primary access to the site from Meyers Avenue will be provided off-site within the City of Escondido via a private road access easement through a vacant parcel to the east; refer also to Table 1, Required Actions and Approvals – Other Public Agencies.

Construction of the proposed project is estimated to commence in March 2020 and would last approximately 21 months, ending in December 2021. Construction would require the use of typical construction equipment, including dozers, tractors, excavators, graders, pavers, rollers, and air compressors. In addition, due to underlying geology, construction would require blasting and the use of a rock crusher for materials processing. A grading variance would be required for several slopes within the project site which exceed 20 feet in height. Approval of a grading variance would allow for grading of two main pads separated approximately on a north-south centerline of the project site. It should be noted that this proposed grading variance has been previously granted on similar projects in the area and is consistent with developments with similar soils and topography.

The specific requested project entitlements/discretionary actions by the City include a General Plan Amendment, Prezone, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit as detailed below:

- General Plan Amendment – A General Plan Amendment is required to re-designate the southern parcel of the project site (APN 228-312-10-00) from Semi-Rural Residential (SR-1) (as currently designated by the County of San Diego) and Light Industrial (LI) (as designated by the City, as the parcel is within its Sphere of Influence) to Specific Plan Area (SPA). Additionally, a General Plan Amendment (GPA) is required to re-designate the northern parcel of the project site (APN 228-312-09-00) from Low Density Residential (LDR) to Specific Plan Area (SPA). This General Plan Amendment would allow the Specific Plan to provide regulations for development of the project site.
- Rezone - A rezone is required to re-designate the southern parcel of the project site (APN 228-312-10-00) from Single Family Residential (RS) (as currently zoned by the County of San Diego) to Specific Plan Area (SPA). Additionally, a rezone is required to change the northern parcel of the project site (APN 228-312-09-00) from Residential Manufactured Home Park (R-MHP) to Specific Plan Area (SPA). This Rezone would allow the Specific Plan to provide regulations for development of the project site.

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- Specific Plan - A Specific Plan is required to be reviewed and approved concurrently with the Site Development Plan application. The Specific Plan establishes the development regulations of all land uses within the project site. Upon adoption of the Specific Plan by the City, all development within the project site must conform to the regulations of the Specific Plan.
- Multi-Family Site Development Plan to address the design of 192 multi-family residential units, associated common open space and residential amenities, and the plotting of floor plans and elevations within the project site.
- Tentative Map to create 192 for-sale condominium units.
- Conditional Use Permit to allow for blasting and the temporary use of a rock crusher during grading operations.
- Grading Variance would be required for several slopes within the project site which exceed 20 feet in height (wall/slope combination up to 36 feet).

In addition to above, Annexation of Assessor Parcel Number APN 228-312-10-00 from the County to the City will require approval by the San Diego Local Agency Formation Commission in accordance with State law.

9. Surrounding land uses and setting:

The project site is immediately bordered by low density residential manufactured homes to the north and west. To the east and south of the project site is a light industrial business park with a variety of businesses located within the City of Escondido. An existing vacant lot is located within the City of Escondido (zoned as Planned Development – Industrial) adjacent the proposed project site access driveways, east/northeast of the project site. The proposed driveway providing project site access from Meyers Avenue is located off-site within the City of Escondido. To the southwest, within the County of San Diego are semi-rural residential lands with associated agricultural and equestrian uses. E. Barham Drive and State Route 78 (SR-78) are located just north of the project site, and Meyers Avenue is to the east.

The North County Transit District (NCTD) operates the Nordahl Road Sprinter and Breeze transit station located approximately 0.3 mile from the E. Barham Drive entrance and approximately 0.4 mile from the Meyers Avenue entrance.

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

Additional approvals from other public agencies may include but are not limited to approval of a site-specific Stormwater Pollution Prevention Plan (SWPPP) and

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approvals from neighboring jurisdictions. Additional permits and approvals from responsible and other agencies are also listed in Table 1.

Table 1
Required Actions and Approvals – Other Public Agencies

Agency	Required Action/Approval
San Diego Local Agency Formation Commission	Approval and other related actions for the annexation of APN 228-312-10-00 into the City from unincorporated County of San Diego lands.
	Approval and other related actions for the annexation of APN 228-312-10-00 into the Vallecitos Water District.
City of Escondido	Encroachment Permit – An Encroachment Permit(s) would be required for Private Driveway “B” and utility improvements on Meyers Avenue and E. Barham Drive.
	Utility Improvement Plan for water, sewer, water quality, drainage, dry utilities, gates, signage, lighting, and road repairs.
	Grading Plan
	Landscaping Plan
Vallecitos Water District	Annexation of APN 228-312-10-00 into the Vallecitos Water District.
San Diego Regional Water Quality Control Board	National Pollutant Discharge Elimination System Construction General Permit (State Water Resources Control Board Order 2009-09-DWQ)

- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? 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 21083.3.2.) 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 with the San Luis Band of Mission Indians. Tribal consultation input will be considered throughout the environmental document preparation process.

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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.

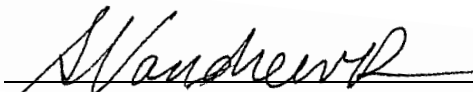
- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources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

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DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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



Signature

March 28, 2019
Date

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EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 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 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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

1.1 Aesthetics

Public Resources Code (PRC) Section 21099(d)(1) states “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit

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priority area shall not be considered significant impact on the environment.” A “transit priority area” is defined as “an area within one-half mile of a major transit stop that is existing or planned”.

PRC Section 21099 provided the additional definitions:

- Infill site: “a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.”
- Transit priority area: “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”

The state CEQA Guidelines provide the following additional definitions:

- Urbanized area: Section 15387 of the CEQA Guidelines states that an urbanized area means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.
- Qualified urban use: Section 15191(k) of the CEQA Guidelines (see also PRC Section 21072), defines qualified urban use as any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.
- Major transit stop: Section 15191(i) of the CEQA Guidelines (see also PRC Section 21064.3) defines a major transit stop as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The project site is located less than one-half mile from the Nordahl Road Sprinter Light Rail station, and any existing rail transit station is considered to be a major transit stop per CEQA Section 21064.3. As such, the project is located within a “transit priority area.” Further, the project site is located on a vacant lot and more than 75% of the project boundary is adjacent to “qualified urban uses” (i.e., residential and commercial) per CEQA Section 21072, and thus qualifies as an “infill site.” As such, based upon the above definitions, the proposed project would be considered a residential project on an infill site within a transit priority area per PRC 21099. Therefore, per PRC Section 21099, aesthetic impacts shall not be considered significant. However, aesthetics will be discussed in the EIR.

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

Less Than Significant Impact. 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 west and south that provide opportunities for elevated vantage points offering long and broad views, which may include views of the project site. Per PRC Section 21099, impacts related to scenic vistas would be less than significant. However, this topic will be discussed and analyzed in the EIR.

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

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

- c) *Would the project, 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?*

Less Than Significant Impact. As described above, the project site is located in an urbanized area. The project site does not have any existing zoning related to scenic quality, such as a scenic overlay zone. The project is a Specific Plan which would include development standards and regulations governing the visual character and aesthetics of future development of the project site. Per PRC Section 21099, impacts related to scenic quality would be less than significant. However, this topic will be discussed and analyzed in the EIR.

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

Less Than Significant Impact. The project would introduce new sources of lighting to the undeveloped project site. Per PRC Section 21099, the project site would be would be considered a residential project on an infill site located within a "transit priority area", As such, impacts related to lighting and glare would be less than significant. However, this topic will be discussed and analyzed in the EIR.

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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"/>
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"/>
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"/>
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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

1.2 Agriculture and Forestry Resources

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

No Impact. Dudek conducted a California Land Evaluation and Site Assessment (LESA) analysis for the project site due to previous agricultural use (Dudek 2018). The LESA analysis concluded that the project site does not contain significant agricultural resources. The LESA analysis will be included in the EIR. Additionally, the project site is designated

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as “Urban and Built-Up Land” and “Other Land” by the Farmland Mapping and Monitoring Program (Department of Conservation 2018). No impact would occur.

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

No Impact. The project site is not zoned for agricultural use or designated as land under the Williamson Act. No 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 Impact. The project site is not zoned for forest land or timberland production. No impact would occur.

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

No 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?***

Less Than Significant Impact. Designated farmland exists within the vicinity of the project site. However, the proposed project, similar to other surrounding development, would not result in substantial changes that could result in the conversion of farmland to non-agricultural use. This topic will be discussed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input 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"/>

1.3 Air Quality

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

Potentially Significant Impact. San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the basin—specifically, the State Implementation Plan (SIP) and RAQS.¹ The County’s *Guidelines for Determining Significance and Report and Format and Content Requirements – Air Quality* discusses conformance with the RAQS (County of San Diego 2007). The guidance indicates that, if the project, in conjunction with other projects, contributes to growth projections that would not exceed SANDAG’s growth projections for the City, the project would not be in conflict with the RAQS (County of San Diego 2007). If a project includes development that is greater than that anticipated in the local plan and SANDAG’s growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality. A General Plan Amendment is necessary to rezone Assessor’s Parcel Number (APN) 228-312-10 within the County from Single Family Residential (RS-1) to the Sunrise Specific Plan (SP), and APN 228-312-09 in the City from Residential Manufactured Home Park (R-MHP) to SP. As such, because the proposed project could result in a conflict with the SIP and RAQS, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

¹ For the purpose of this discussion, the relevant federal air quality plan is the Ozone Maintenance Plan (SDAPCD 2012). The RAQS is the applicable plan for purposes of State air quality planning. Both plans reflect growth projections in the basin.

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- 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?*

Potentially Significant Impact. Construction of the proposed project would generate air pollutant emissions from dust, off-road equipment, vehicle emissions, rock crushing, blasting, architectural coatings, and asphalt pavement application. Following the completion of construction activities, the project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from mobile sources, including vehicular traffic generated by residents of the project; area sources, including the use of landscaping equipment and consumer products; and from architectural coatings. As such, air quality emissions associated with both construction and operation of the project could be potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. As such, because the proposed project could expose sensitive receptors to substantial pollutant concentrations, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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. Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the proposed project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would not engage in any of these activities. Moreover, typical odors generated from operation of the proposed project would primarily include vehicle exhaust generated by residents, as well as through the periodic use of landscaping or maintenance equipment. Therefore, impacts

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would be considered less than significant. However, this topic will be further discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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"/>
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"/>
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"/>
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"/>
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"/>
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"/>

1.4 Biological Resources

- 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 and six vegetation communities/land covers were mapped within the Project site. These include

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wild oats grassland, California buckwheat scrub (including Disturbed), black sage scrub, white sage scrub, agricultural (orchard), and ornamental. Native vegetation communities within the Project site include 4.52 acres of black sage scrub, 0.38 acres of California buckwheat scrub, 1.55 acres of disturbed California buckwheat scrub, and 0.07 acres of white sage scrub, which is a total of 6.52 acres of coastal sage scrub and its subcategories of habitat. Further, one coastal California gnatcatcher individual and one special-status reptile, Belding's orange-throated whiptail were observed during the focused surveys completed in 2018. Along with these 2 species, five other species have moderate to high potential to occur within the Project site. As such, impacts to special-status species are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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. As discussed above, sensitive vegetation communities are present on site. As such, the proposed project could result in disturbance of these communities. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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. Jurisdictional waters could be present within the project site or surrounding area. As such, because the potential for wetland or non-wetland water features were present in the area is unknown at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The proposed project is undeveloped but surrounded by development on all sides, limiting the effectiveness of the site as a wildlife movement corridor. 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 EIR.

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- 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. A few trees are present thorough the site and would be removed with implementation of the proposed project. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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 project would be required to conform to the goals and policies in the City of San Marcos General Plan, North County Multiple Species Conservation Plan (MSCP), and any approved Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) subarea plan, related to the protection of biological resources. 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 EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
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"/>

1.5 Cultural Resources

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064?*

Potentially Significant Impact. Because the presence of historical resources on site is not known at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Because the presence of archeological resources on site is not known at this time, and because the proposed project could result in disturbance of unidentified archeological resources, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Because 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 EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.6 Energy

- 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?*

Potentially Significant Impact. During construction, the proposed project would utilize temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning), and petroleum for construction equipment. During operations, the proposed project would generate electricity for operation of residences, natural gas primarily for heating of homes, and petroleum use for movement of vehicles. Due to increased consumption of energy on-site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Due to increased consumption of energy on-site, the project could conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.7 Geology and Soils

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

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

Less Than Significant Impact. Geotechnical evaluations have been prepared for the proposed project and will be included in the EIR. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. However, because the proposed project would be located in tectonically active southern California, impacts would be potentially significant. This topic will be discussed and analyzed in the EIR.

ii) *Strong seismic ground shaking?*

Potentially Significant Impact. Because the proposed project would be located in tectonically active southern California, the project would be required to comply with the California Building Code. Additional recommendations for seismic safety may also be required. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

iii) *Seismic-related ground failure, including liquefaction?*

Potentially Significant Impact. Because potential for seismic-related ground failure, including liquefaction are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

iv) *Landslides?*

Potentially Significant Impact. The project site and surrounding area are slightly to moderately sloping. Because potential for landslides are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. A grading variance would be required for several slopes within the project site which exceed 20 feet in height. All slopes, including proposed cut and fill slopes, are susceptible to surficial slope failure or erosion. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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- 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?*

Potentially Significant Impact. Because the project site could consist of unstable soils, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Because the soils at project site are not know at this time, mpacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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 Impact. The proposed project does not include the use of septic tanks. No impact would occur.

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

Potentially Significant Impact. Because the soils at project site and thus the potential to unearth paleontological resources, are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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1.8 Greenhouse Gas Emissions

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

Potentially Significant Impact. The City has adopted a Climate Action Plan (CAP), which was developed to help reduce the City's GHG emissions. Generally, this is achieved by demonstrating consistency with the permitted land use; however, the project would not be consistent with the existing land use and zoning as inventoried in the CAP. Projects that do not comply with the land use designation at the time the CAP was developed are generally considered inconsistent with the CAP. However, if buildout of the proposed land use can be demonstrated to result in fewer emissions than buildout of the existing land use designated in the General Plan, the project would be consistent with the CAP. Nonetheless, because the project is inconsistent with the land use designation of the site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Potentially Significant Impact. Under the City's CEQA Thresholds, the method for determining significance for project-level environmental documents is through the CAP Consistency Worksheet (City of San Marcos 2013b). The EIR will assess the project's consistency with the CAP. Until then, impacts are considered potentially significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>

1.9 Hazards and Hazardous Materials

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

Potentially Significant Impact. Construction and operations of the proposed project would entail transport, use, or disposal of potentially hazardous materials that are routinely used for construction and for household uses. However, some trash and debris, including one concrete and asphalt rubble pile, trash debris piles, and a groundwater supply well are present on site. Because these existing materials could be hazardous and transport, use, or disposal of these existing materials could result in a hazard to the public or the environment, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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?*

Potentially Significant Impact. As discussed above, trash and debris, including one concrete and asphalt rubble pile, trash debris piles, and a groundwater supply well are present on site. Because these existing materials could be hazardous and could potentially

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result in a foreseeable upset and accident conditions, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

No Impact. The proposed project is not located within one-quarter mile of an existing or proposal school. No 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?*

Potentially Significant Impact. A database search report which documents various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials, chemical handlers, and/or polluters would be performed at the site. The results of the database search will be will be discussed and analyzed in the EIR. Impacts are considered potentially 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?*

Less Than Significant Impact. The public airport closest to the project site is the McClellan-Palomar Airport, located approximately 8.5 miles west. However, the project site is located within Review Area 2 of the airport influence area (AIA), according to the Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority 2011). Limits on the heights of structures are the only restrictions on land uses within Review Area 2. The project site is not located in an area of high terrain or in an area of Terrain Penetration to Airspace Surfaces. Further, all buildings would not exceed 40 feet in height. This topic will be further discussed in the EIR.

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

Less Than Significant Impact. An Evacuation Plan has been prepared for the proposed project and will be incorporated into the EIR. According to the General Plan Safety Element, the San Marcos Emergency Operations Plan (EOP) governs the operations of the City during a disaster. This plan addresses response to moderate evacuation scenarios,

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including the identification of evacuation points and general routes (City of San Marcos 2013a). Based on the existing road network, the community can evacuate to the north, east, south and west within a short distance, depending on the nature of the emergency. Impacts are expected to be less than significant; however, this topic will be discussed and analyzed in the EIR.

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

Less Than Significant Impact. The project site is not designated as a high fire severity zone (Ready San Diego 2018). An Evacuation Plan was prepared for the proposed project in case of a wildland fire. The project would be constructed in accordance with the California Fire Code and the San Marcos Fire Department, which require a design that affords fire and emergency responders suitable fire access roads dimensions and surfaces. Thus, impacts are considered less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.10 Hydrology and Water Quality

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

Less Than Significant Impact. Construction activities associated with the proposed project could result in wind and water erosion of the disturbed area leading to sediment discharges. Additionally, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact water quality. The proposed project is required to comply with the National Pollution Discharge Elimination System (NPDES) State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ for stormwater discharges and general construction activities, and incorporate standard Best Management Practices (BMPs) such as regular cleaning or sweeping of construction areas and impervious areas, and various stormwater BMPs such as filtration media screens. In compliance with the Construction General Permit, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that specifies BMPS that would be implemented during construction to minimize impacts to water quality. Therefore, impacts are expected to be less than significant. This topic will be further discussed and analyzed in the EIR.

- 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?***

Potentially Significant Impact. The project does not propose the use of groundwater resources. However, the project would result in increased stormwater runoff which could potentially interfere with groundwater recharge. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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- 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:*

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

Potentially Significant Impact. The proposed project would increase the area of impervious surface on the project site, which could increase runoff flow rates or volumes, which could result in erosion or siltation on- or off-site. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. As discussed above, the proposed project would increase the area of impervious surface on the project site, which could increase runoff flow rates or volumes, which could result in flooding on- or off-site. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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*

Potentially Significant Impact. As discussed above, because the proposed project would increase the area of impervious surface on the project site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- iv) *Impede or redirect flood flows?*

Potentially Significant Impact. As discussed above, because the proposed project would increase the area of impervious surface on the project site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

No Impact. Per the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map Number 06073C0794G, the project site is not located within a 100-year flood hazard area (FEMA 2012). The project site is approximately 11 miles inland from the Pacific Ocean and would not be subject to inundation by tsunami. Given that the project site is not located near a large standing body of water, inundation by seiche (or

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standing wave) is considered negligible. The project site is generally flat with no steep slopes and does not contain slopes subject to mudflows. No impact would occur.

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

Potentially Significant Impact. The project site is located within the Carlsbad Management Area Water Quality Improvement Plan (WQIP). Wetlands could be present within the project site or surrounding area. As such, because the potential for wetland or non-wetland water features were present in the area is unknown at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. 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"/>
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.11 Land Use and Planning

- a) ***Would the project physically divide an established community?***

No Impact. The proposed project would not construct structures that have the potential to physically divide an established community (such as large roadways, walls/fences, etc.). The site currently has no public access and no existing roadways, trails, or other means of travel exist through the project site. Therefore, the proposed project would not result in the physical division of an established community. No impact would occur.

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

Potentially Significant Impact. The proposed project would require approval and adoption of the GPA by City Council, rezoning of the site, and approval of an annexation of the southern parcel into the City. The proposed project's consistency with applicable plans and

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policies, including San Marcos General Plan, the City of San Marcos zoning ordinance, the McClellan-Palomar Airport Land Use Compatibility Plan, and 2050 Regional Transportation Plan/Sustainable Communities Strategy, will be discussed and analyzed in the EIR. Because the proposed project would be inconsistent with the land use designation of the project site, and because the project could result in potentially significant environmental impacts, impacts are considered potentially significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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"/>
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"/>

1.12 Mineral Resources

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

No Impact. According to the City of San Marcos General Plan Conservation & Open Space Element, the City has land classified in all four Mineral Resource Zones (MRZ) (City of San Marcos 2013a). California does not require that local governments protect land designated as MRZ-1, MRZ-3, or MRZ-4. However, the City is responsible for recognizing lands designated as MRZ-2 and protecting these areas from premature development incompatible with mining. The lands designated as MRZ-2 include small portions between Double Peak, Mt. Whitney, and Franks Peak; and small portions in the northern Sphere of Influence within Twin Oaks Valley Neighborhood. These locations do not overlap with the proposed project site; therefore, no loss of known mineral resources would occur. No 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 Impact. 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

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of San Marcos 2013a). Due to the location and the nature of the proposed project, there would be no impact to mineral resources.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

1.13 Noise

- 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?*

Potentially Significant Impact. Construction of the proposed project would result in use of equipment, rock crushing activities, and vehicle trips that would generate noise in the area. During operations, the proposed project would generate noise through introduction of additional traffic on site, and an increase on stationary source noise, such as increased human presence on-site. Sensitive receptors, including residences, are located near the project site. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. Construction of the proposed project would require blasting and rock crushing activities, which could result in generation of excessive

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groundborne vibration or noise levels. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- c) *Would the project be 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?*

Less Than Significant Impact. The proposed project is not located within the vicinity of a private airstrip. The public airport closest to the project site is the McClellan-Palomar Airport, located approximately 8.5 miles west. 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. This topic will be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

1.14 Population and Housing

- 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)?*

Potentially Significant Impact. The proposed project would directly induce growth through the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. Based on the population rate coefficient of 3.14 persons per dwelling unit, as established by the California Department of Finance, the proposed project would directly induce population growth to the area and would potentially add an estimated 603 people to the area (DOF

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2018). Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

No Impact. There is no existing housing or people on the proposed project site; therefore, the proposed project would not displace any housing. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.15 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?

Potentially Significant Impact. The proposed project would increase the demand on San Marcos Fire Department resources as a result of the development of residential uses and the associated population increase. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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Police protection?

Potentially Significant Impact. The project would introduce approximately 603 residents on-site, resulting in an increased demand on existing police protection resources. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

Schools?

Potentially Significant Impact. The proposed project would introduce 603 residents to the site, some of which are expected to be students. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

Parks?

Potentially Significant Impact. Buildout of the proposed project is estimated to add an additional 603 residents to the City, which would result in increased demand for parks. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

Other public facilities?

Potentially Significant Impact. Development of the project would result in an additional 603 residents to the City. This would increase the demands on library services and resources. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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1.16 Recreation

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

Potentially Significant Impact. Buildout of the proposed project is estimated to add an additional 603 residents to the City. This increase in residents would increase demands for neighborhood and regional parks and other recreational facilities. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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?*

Potentially Significant Impact. Impacts associated with construction of the proposed project's public and private open space are considered within the overall development footprint for the proposed project. Impacts of the overall development would be analyzed in the EIR. As such, impacts from construction of recreational facilities are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1.17 Transportation

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

Potentially Significant Impact. Construction of the proposed project would require approximately 78,800 cubic yards of cut and fill to be balanced on site, which would result in trips to and from the site. During operations, the proposed project would generate traffic to the existing roadway network. Project-generated traffic would also result in vehicle miles traveled (VMT) and will therefore need to be analyzed for consistency with State and local guidance. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?*

Potentially Significant Impact. Implementation of the proposed project would generate traffic to the existing roadway network. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Less Than Significant Impact. All roadways, including off-site improvements, constructed in association with the proposed project would be subject to existing City design standards and safety specifications for roadways. This topic will be further discussed and analyzed in the EIR.

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

Less Than Significant Impact. The California Fire Code, along with the San Marcos Fire Department, administers the rules and regulations on fire access design. The proposed project must present a design which affords fire and emergency responders suitable fire access roads dimensions and surfaces (Chapter 5, § 503.1 through 503.4 of the California Fire Code), an adequate number of emergency rated entrances to the community (Appendix D, §D106 of the California Fire Code), and entryway gate access for first responders (Chapter 5 of the California Fire Code, §503.6). Two points of entry have been identified for the project site and are designed to meet the design requirements codified in the California Fire Code. Both project site entrances meet the qualifications for emergency access to for the project site. Therefore, with implementation of procedures outlined in the

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Evacuation Plan and compliance with the California Fire Code and San Marcos Fire Department requirements, the proposed project would not result in inadequate emergency access. Impacts would be less than significant. However, this topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.18 Tribal Cultural Resources

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 City has notified the tribes in accordance with Public Resources Code section 21074. To date, tribal consultation has been initiated

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with the San Luis Band of Mission Indians. Tribal consultation input will be considered throughout the environmental document preparation process. However, as consultation with tribes is still ongoing, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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. As discussed above, the City has notified the tribes in accordance with Public Resources Code section 21074. As consultation with tribes is still ongoing, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.19 Utilities and Service Systems

- a) *Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?*

Potentially Significant Impact. The proposed project would include development of 192 residential units. As such, the proposed project would increase the intensity of uses on the project site, resulting in increased use of water, wastewater treatment, electric power, natural gas, and telecommunication systems. Further, the proposed project would result in an increase of impervious areas. If not carefully planned for, increased runoff from impervious surface can cause alterations to drainage courses. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- b) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, and reasonably foreseeable future development during normal, dry and multiple dry years or are new or expanded entitlements needed?*

Potentially Significant Impact. As discussed above, the proposed project would increase the intensity of uses on the project site, resulting in increased water use. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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?*

Potentially Significant Impact. As discussed above, the proposed project would result in increased wastewater generation. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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?*

Potentially Significant Impact. Construction of the proposed project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Operation of the proposed project would result in an increase in intensity of uses on the project site, which would likely be associated with increased generation of solid waste. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

Potentially Significant Impact. As discussed above, the proposed project would result in the generation of solid waste during construction and operations. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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 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 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>

1.20 Wildfire

The project site is located in and near state responsibility areas (SRA) and near lands classified as “very high” fire hazards severity zones (CAL FIRE 2007 and 2009). The southern parcel of the project site is currently located within an SRA with a “moderate” fire hazard severity designation (CAL FIRE 2007). The northern parcel of the project site is located within a local responsibility area (LRA) with a “moderate” fire hazard severity designation (CAL FIRE 2009). Lands in the vicinity (west, east, and south) in both the SRA and LRA are designated with a “very high” fire hazard severity zone (CAL FIRE 2007 and 2009). However, these areas are separated from the project site by existing residential and commercial development (to the west, east, and south), as well as areas of “moderate” and “high” fire hazard severity zones. Therefore, due to the existing surrounding development, it is expected that the project would result in less than significant impacts related to wildfire. However, this topic will be discussed and analyzed in the EIR.

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

Less Than Significant Impact. Refer to Section 1.9, Hazards and Hazardous Materials. Impacts would be less than significant; however, this topic will be discussed in the EIR.

- b) *Would the project, 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?*

Less Than Significant Impact. For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.

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

Less Than Significant Impact. For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.

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

Less Than Significant Impact. For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.

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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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"/>
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"/>
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"/>

1.21 Mandatory Findings of Significance

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of 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 1.4, Biological Resources, the proposed project has the potential to impact sensitive vegetation communities and habitat for special-status wildlife. Further, as discussed in Section 1.5, the proposed project could result in potentially significant impacts to cultural resources. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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- 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. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- 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 throughout this document, the proposed project could result in impacts to Aesthetics, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

Initial Study for the Sunrise Specific Plan

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2 REFERENCES AND PREPARERS

2.1 References Cited

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FIGURE 1

Project Site and Surroundings

Initial Study for the Sunrise Specific Plan

Initial Study for the Sunrise Specific Plan

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Initial Study for the Sunrise Specific Plan

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DEPARTMENT OF TRANSPORTATION

DISTRICT 11

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*Making Conservation
a California Way of Life.*

May 1, 2019

11-SD-78

PM 15.824

Sunrise Project Specific Plan

NOP/SCH#2019049004

Ms. Susan Vandrew Rodriguez
Associate Planner
City of San Marcos Planning Division
1 Civic Center Drive
San Marcos, CA 92069

Dear Ms. Vandrew Rodriguez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation for a Draft Environmental Impact Report for the Sunrise Project Specific Plan located near State Route 78 (SR-78). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- Please include ramp intersections at State Route (SR-78)/E. Barham Drive and SR-78/Nordahl Road. The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.

- In addition, the TIS could also consider implementing vehicles miles traveled (VMT) analysis into their modeling projections.
- Any increase in goods movement operations and its impacts to State highway facilities should be addressed in the TIS.
- The data used in the TIS should not be more than 2 years old.
- Please provide Synchro Version 10 files.
- Early coordination is recommended.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Marcos, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Ms. Susan Vandrew Rodriguez
May 1, 2019
Page 3

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS/TIA. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Right-of-Way

Any work performed within Caltrans' right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,



MELINA PEREIRA, Acting Branch Chief
Local Development and Intergovernmental Review Branch



State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 2, 2019

Susan Vandrew Rodriguez, Associate Planner
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svandrew@san-marcos.net

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Sunrise Specific Plan Project SCH# 2019049004

Dear Ms. Rodriguez:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Sunrise Specific Plan Project Draft Environmental Impact Report (DEIR).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Department Role

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

The Department is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) The Department may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the project may be subject to the Department's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

The Department also administers the Natural Community Conservation Planning (NCCP) program.

Project Location:

The approximately 14.4-acre project site is located at the southeastern limits of the city of San Marcos (City) and is comprised of Assessor's Parcel Numbers (APN) 228-312-09-00 and 228-312-10-00. The project site is currently within two jurisdictions: approximately 3.6 acres in the City, and approximately 10.8 acres in the County of San Diego (County); however, the entirety of the project resides within the City's General Plan Sphere of Influence. The site is not currently accessible by a public roadway, but an existing 9-foot-wide unimproved access easement connects to East Barham Drive.

Project Description/Objective:

The proposed project would consist of an Annexation, General Plan Amendment, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit. The proposed project would allow for the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. The proposed residential units would be comprised of 100 two-story townhomes and 92 three-story townhomes. The proposed project would also include open space, active recreational areas, bio-retention areas, circulation improvements, and a public services and facilities plan. The proposed project would require several off-site improvements including storm drainage facilities, roadway network construction, and sewer improvements.

COMMENTS AND RECOMMENDATIONS

The Department offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.¹ Please note that

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

- b) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.²
2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. The project site is near known locations for the CESA and federal ESA listed thread-leaved brodiaea (*Brodiaea filifolia*). As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

² A notification package for a LSA may be obtained by accessing the Department's web site at <http://www.wildlife.ca.gov/Conservation/LSA>.

3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.
 - a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands and sensitive plant communities subject to regional planning efforts. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DEIR should include the following information.
 - a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). The Department recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 20083). Alternately, for assessing vegetation communities located in western San Diego County, the Vegetation Classification Manual for Western San Diego County (Sproul et al. 20114) may be used. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

3 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

4 Sproul, F., T. Keeler-Wolf, P. Gordon-Reedy, J. Dunn, A. Klein and K. Harper. 2011. Vegetation Classification Manual for Western San Diego County. First Edition. Prepared by AECOM, California Department of Fish and Game Vegetation Classification and Mapping Program and Conservation Biology Institute for San Diego Association of Governments.

- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

- 5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
 - d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration either on or off site, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
9. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i)

contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

CONCLUSION

The Department appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Eric Hollenbeck, Senior Environmental Scientist Specialist at (858) 467-2720 or Eric.Hollenbeck@wildlife.ca.gov.

Sincerely,



Gail K. Sevrems
Environmental Program Manager
South Coast Region

cc: Office of Planning and Research, State Clearinghouse
Janet Stuckrath, USFWS
Eric Weiss, CDFW



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
5796 Corporate Avenue
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Gavin Newsom
Governor

May 2, 2019

Ms. Susan Vandrew Rodriguez
Associate Planner
City of San Marcos
Development Services Department
Planning Division
1 Civic Center Drive
San Marcos, California 92069

NOTICE OF PREPARATION FOR SUNRISE SPECIFIC PLAN PROJECT, SAN MARCOS (SCH#2019049004)

Dear Ms. Rodriguez:

The Department of Toxic Substances (DTSC) received a Notice of Preparation of an Environmental Impact Report (EIR) for the Sunrise Specific Plan Project located at the southeastern limits of the city of San Marcos. The project site is comprised of Assessor's Parcel Numbers (APNs) 228-312-09-00 and 228-312-10-00.

The proposed project, if approved, would allow development of 192 multi-family units with public and private recreational and open space within a 14.2-acre-land. The project site is currently vacant, with areas disturbed from previous agricultural uses. In addition, trash and debris, concrete and asphalt rubble piles and a groundwater supply well were observed at the project site.

DTSC recommends the following issues be included in the Environmental Impact Report (EIR), Hazards and Hazardous Materials section:

1. Some areas within the project site were historically used for agriculture. The EIR should discuss potential presence of organochlorine pesticides and metal-based herbicides and propose proper investigation, and remedial actions, if necessary. The investigation and remediation, if proposed, should be conducted under the oversight of and approved by a regulatory agency that has jurisdiction to oversee

Ms. Susan Vandrew Rodriguez
May 2, 2019
Page 2

hazardous substance cleanup prior to construction of the project. DTSC recommends that the soil be investigated for agriculture related chemicals in accordance with DTSC's Interim Guidance for Sampling Agricultural Fields that are proposed for School Sites
(<https://dtsc.ca.gov/assessingRisk/upload/Sampling-Ag-Fields-for-Schools.pdf>)

2. Trash and debris were observed at the project site. The EIR should discuss whether there are any building construction materials and/or debris that may contain lead-based paint, mercury, asbestos containing materials, and polychlorinated biphenyl containing caulk. If the construction materials and/or debris are identified, they should be disposed of in accordance with all applicable laws and regulations and soil investigation may be needed.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at:
<https://www.dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,



Chia Rin Yen
Environmental Scientist
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

ar/cy/yg

cc: See Next Page.

Ms. Susan Vandrew Rodriguez
May 2, 2019
Page 3

cc: (via e-mail)

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RECEIVED

APR 15 2019

CITY OF SAN MARCOS
PLANNING DIVISION

U.S. Department of Homeland Security
FEMA Region IX
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FEMA

April 8, 2019

Susan Vandrew Rodriguez, Associate Planner
City of San Marcos, Planning Division
1 Civic Center Drive
San Marcos, California 92069

Dear Ms. Rodriguez:

This is in response to your request to comment on the Draft Environmental Impact Report and Public Scoping Meeting – Subject: Project Title Sunrise.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of San Diego (Community Number 060284), Maps revised April 5, 2016 and City of San Marcos (Community Number 060296), Maps revised May 16, 2012. Please note that the City of San Marcos, San Diego County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any **development** must not increase base flood elevation levels. **The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Susan Vandrew Rodriguez, Associate Planner
Page 2
April 8, 2019

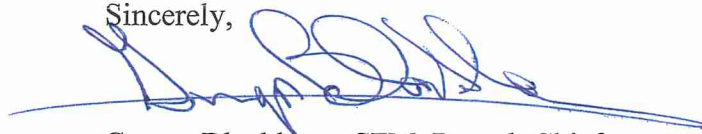
- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The San Marcos floodplain manager can be reached by calling Mike Edwards, Public Works Manager, at (760) 744-1050. The San Diego County floodplain manager can be reached by calling Sara Agahi, Flood Control District Manager, at (858) 694-2665.

If you have any questions or concerns, please do not hesitate to call Mark Delorey of the Mitigation staff at (510) 627-7015.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Mike Edwards, Public Works Director, City of San Marcos

Sara Agahi, Flood Control District Manager, San Diego County

Garret Tam Sing, State of California, Department of Water Resources, Southern Region
Office

Mark Delorey, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department

1550 Harbor Blvd., Suite 100

West Sacramento, CA 95691 Phone (916) 373-3710

Email: nahc@nahc.ca.gov

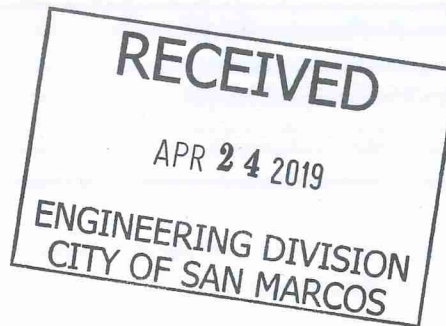
Website: <http://www.nahc.ca.gov>

Twitter: @CA_NAHC



April 16, 2019

Susan Vandrew Rodriguez
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069



RE: SCH# 2019049004 Sunrise Project Environmental Impact Report Notice of Preparation, San Diego County

Dear Ms. Rodriguez:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my
email address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for
Steven Quinn
Associate Governmental Program Analyst

cc: State Clearinghouse



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

April 2, 2019

To: Reviewing Agencies

Re: Sunrise Project Environmental Impact Report Notice of Preparation
SCH# 2019049004

Attached for your review and comment is the Notice of Preparation (NOP) for the Sunrise Project Environmental Impact Report Notice of Preparation draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Susan Vandrew Rodriguez
San Marcos, City of
1 Civic Center Drive
San Marcos, CA 92069

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019049004/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # **2019049004****Project Title:** Sunrise Project Environmental Impact Report Notice of Preparation

Lead Agency: City of San Marcos Contact Person: Susan Vandrew Rodriguez
 Mailing Address: 1 Civic Center Drive Phone: 760-744-1050, ext. 3237
 City: San Marcos Zip: 92069 County: San Diego

Project Location: County: San Diego City/Nearest Community: San Marcos
 Cross Streets: Barham Drive between Bennett Court and E. Meyers Avenue Zip Code: 92069
 Longitude/Latitude (degrees, minutes and seconds): _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W Total Acres: 14.4
 Assessor's Parcel No.: 228-312-09-00 and 218-312-10-00 Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: _____ Waterways: _____
 Airports: _____ Railways: _____ Schools: _____

Document Type:

CEQA: ☒ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) _____ ☐ FONSI
☐ Mit Neg Dec Other: _____

Local Action Type:

☐ General Plan Update ☒ Specific Plan ☒ Redevelopment ☒ Annexation
☒ General Plan Amendment ☐ Master Plan ☒ Prezone ☒ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☒ Use Permit ☐ Coastal Permit
☐ Community Plan ☒ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: _____

Development Type:

☒ Residential: Units 192 Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW
☐ Waste Treatment: Type _____ MGD
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☐ Agricultural Land ☐ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☐ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☐ Soil Erosion/Compaction/Grading ☐ Growth Inducement
☐ Coastal Zone ☒ Noise ☐ Solid Waste ☒ Land Use
☐ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☐ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: Cultural, Energy, and

Present Land Use/Zoning/General Plan Designation:

APN 228-312-09-00: County GP: Semi-Rural Residential (SR-1), 2, 4 or 8 du/acre; San Marcos GP: Light Industrial (LI); County Zoning _____

Project Description: (please use a separate page if necessary)

Please see attached for full description. City of San Marcos Project Entitlements include:

- ☒ Specific Plan to guide the orderly development of the project site concurrently with the Multi-family Site Development Plan application to establish the development rules and regulations for all land uses within on the project site.
- ☒ A Prezone of Assessor Parcel Number 228-312-10-00 to change the County Single Family Residential (RS) Zone to San Marcos Specific Plan Area (SPA) zone.
- ☒ A Rezone of Assessor Parcel Number 228-312-09-00 to change zone from Residential Manufactured Home Park (R-MHP) to Sp

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: San Diego

SCH# 2019049004

Resources Agency

☒ **Resources Agency**
Nadell Gayou

☐ **Dept. of Boating & Waterways**
Denise Peterson

☐ **California Coastal Commission**
Allyson Hitt

☐ **Colorado River Board**
Elsa Contreras

☒ **Dept. of Conservation**
Crina Chan

☒ **Cal Fire**
Dan Foster

☐ **Central Valley Flood Protection Board**
James Herota

☒ **Office of Historic Preservation**
Ron Parsons

☒ **Dept of Parks & Recreation**
Environmental Stewardship Section

☐ **S.F. Bay Conservation & Dev't. Comm.**
Steve Goldbeck

☒ **Dept. of Water Resources**
Resources Agency
Nadell Gayou

Fish and Game

☐ **Depart. of Fish & Wildlife**
Scott Flint
Environmental Services Division

☐ **Fish & Wildlife Region 1**
Curt Babcock

☐ **Fish & Wildlife Region 1E**
Laurie Harnsberger

☐ **Fish & Wildlife Region 2**
Jeff Drongesen

☐ **Fish & Wildlife Region 3**
Craig Weightman

☐ **Fish & Wildlife Region 4**
Julie Vance

☒ **Fish & Wildlife Region 5**
Leslie Newton-Reed
Habitat Conservation Program

☐ **Fish & Wildlife Region 6**
Tiffany Ellis
Habitat Conservation Program

☐ **Fish & Wildlife Region 6 I/M**
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

☐ **Dept. of Fish & Wildlife M**
William Paznokas
Marine Region

Other Departments

☐ **California Department of Education**
Lesley Taylor

☐ **OES (Office of Emergency Services)**
Monique Wilber

☐ **Food & Agriculture**
Sandra Schubert
Dept. of Food and Agriculture

☐ **Dept. of General Services**
Cathy Buck
Environmental Services Section

☐ **Housing & Comm. Dev.**
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

☐ **Delta Protection Commission**
Erik Vink

☐ **Delta Stewardship Council**
Anthony Navasero

☐ **California Energy Commission**
Eric Knight

☒ **Native American Heritage Comm.**
Debbie Treadway

☐ **Public Utilities Commission**
Supervisor

☐ **Santa Monica Bay Restoration**
Guangyu Wang

☐ **State Lands Commission**
Jennifer Deleong

☐ **Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Cal State Transportation Agency CalSTA

☐ **Caltrans - Division of Aeronautics**
Philip Crimmins

☐ **Caltrans - Planning**
HQ LD-IGR
Christian Bushong

☐ **California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

☐ **Caltrans, District 1**
Rex Jackman

☐ **Caltrans, District 2**
Marcelino Gonzalez

☐ **Caltrans, District 3**
Susan Zanchi

☐ **Caltrans, District 4**
Patricia Maurice

☐ **Caltrans, District 5**
Larry Newland

☐ **Caltrans, District 6**
Michael Navarro

☐ **Caltrans, District 7**
Dianna Watson

☐ **Caltrans, District 8**
Mark Roberts

☐ **Caltrans, District 9**
Gayle Rosander

☐ **Caltrans, District 10**
Tom Dumas

☒ **Caltrans, District 11**
Jacob Armstrong

☐ **Caltrans, District 12**
Maureen El Harake

Cal EPA

Air Resources Board

☐ **Airport & Freight**
Jack Wursten

☐ **Transportation Projects**
Nesamani Kalandiyur

☒ **Industrial/Energy Projects**
Mike Tollstrup

☐ **California Department of Resources, Recycling & Recovery**
Kevin Taylor/Jeff Esquivel

☐ **State Water Resources Control Board**
Regional Programs Unit
Division of Financial Assistance

☒ **State Water Resources Control Board**
Cindy Forbes - Asst Deputy
Division of Drinking Water

☐ **State Water Resources Control Board**
Div. Drinking Water # _____

☐ **State Water Resources Control Board**
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

☐ **State Water Resources Control Board**
Phil Crader
Division of Water Rights

☒ **Dept. of Toxic Substances**
Control Reg. # _____
CEQA Tracking Center

☐ **Department of Pesticide Regulation**
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ **RWQCB 1**
Cathleen Hudson
North Coast Region (1)

☐ **RWQCB 2**
Environmental Document Coordinator
San Francisco Bay Region (2)

☐ **RWQCB 3**
Central Coast Region (3)

☐ **RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)

☐ **RWQCB 5S**
Central Valley Region (5)

☐ **RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office

☐ **RWQCB 5R**
Central Valley Region (5)
Redding Branch Office

☐ **RWQCB 6**
Lahontan Region (6)

☐ **RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office

☐ **RWQCB 7**
Colorado River Basin Region (7)

☐ **RWQCB 8**
Santa Ana Region (8)

☒ **RWQCB 9**
San Diego Region (9)

☐ **Other** _____

☐ _____
Conservancy

**Sunrise Specific Plan
Scoping Meeting Comments**

(please hand in to City staff at the meeting or return by 5:30 p.m. on May 2, 2019)

Name: Freda K. Kuonen
Agency/Organization: Cusitas Del Sol - HOA
Address: 1219 E. BAAHAM DR #90
City, State, Zip Code: SAN MARCOS, CA
Phone (optional): [REDACTED] (Please do not sell or trade or
publish my phone #.)
E-mail (optional): [REDACTED]@yahoo.com
Would you like to remain on our mailing list to receive future project updates? Yes ☒ No ☐
[REDACTED]@yahoo.com

Comments:

- ① Greatly concerned about multi family units being built in the midst of multiple senior only projects
- ② Very concerned about the traffic problem - the large "driveway" is not large only long and we were told previously by the Builders that the long driveway would only be used for trash (EDCO) etc not for the egress of the families
- ③ Very concerned about introducing that much noise into a senior community - this is currently a low crime & low noise area -
- ④ Concerned about the increase of ~~work~~ Rush hour traffic -
- ⑤ Concerned about the impact on schools & school buses -
- ⑥ For the record the Sprinter has a limited route for transportation and

Comments (continued)

will not provide a good source of transportation for the average person most folks will still need to be using personal rather than public transportation - Parents will still need to take children to school - schools are not within walking distance of the area

-----Please fold in thirds-----

Please tape it closed and affix a stamp. Thank you!

Affix
Postage
Stamp

City of San Marcos Planning Division

1 Civic Center Drive

San Marcos, CA 92069

Attn: Susan Vandrew Rodriguez, Associate Planner

Sunrise Specific Plan Scoping Meeting Comments

(please hand in to City staff at the meeting or return by 5:30 p.m. on May 2, 2019)

Name:

Don & Cindy BERRY

Agency/Organization:

HOMECOMING La Morée Estates

Address:

1175-65 LA MOREE ROAD

City, State, Zip Code:

SAN MARCOS, CA, 92078

Phone (optional):

760 - 745 - 1572

E-mail (optional):

DBERRY 7@Roadrunner.com

Would you like to remain on our mailing list to receive future project updates? Yes ☒ No ☐

Comments:This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

30 April 2019

To: Ms. Susan Vandrew Rodriguez, Associate Planner
Planning Division
City of San Marcos
1 Civic Center Drive
San Marcos, California 92069

Subject: Notice of Preparation of a Draft Environmental Impact Report
Sunrise Project
SP18-0002, R18-0002, PZ18-0001, GPA18-0002, TSM18-0001,
MFSDP18-0001, GV18-0001, CUP18-0006

Dear Ms. Rodriguez:

Thank you for the Notice of Preparation for the subject project, received by this Society earlier this month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File



SIGN IN SHEET

BEFORE YOU SIGN THIS FORM, PLEASE NOTE that the City will retain this sign-in sheet in its files for this project and that this sheet and/or information contained herein is subject to disclosure in response to Public Records Act requests. Please do not provide information that you believe is confidential or private. If you have any questions, please ask to speak with Planning Manager Karen Brindley, (760) 744-1050 ext. 3220, or City Attorney Helen Peak, (760) 743-1226 ext. 108. Thank you.

PUBLIC SCOPING MEETING

Sunrise Project
April 10, 2019

If you are **not** currently receiving Public Notices regarding this project and wish to receive them, please "X" the box at the far right ----- ☒

NAME (Please print clearly)	ADDRESS (Include City and Zip Code)	PHONE # and E-mail Address	
1. ROBERT KUONEN	1219 E. BARHAM #90		
2. Freda Kuonen	1219 E. Barham D. #90	760 703 6262	do not public sell
3. Cindy Berry	1175-65 LA MORE RD.		
4. Don Berry	" "		
5. Al Berkley	1219 E Barham #49	ALBERKLEY@COX.NET	
6. Roger Egan	1219 E. Barham #63A	760-644-0169 roger.egan@live.com	
7. Ann Bray	1195-37 LA MORE RD	760-738-1865	
8.			
9.			
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13.			

www.san-marcos.net

BEFORE YOU SIGN THIS FORM, PLEASE NOTE that the City will retain this sign-in sheet in its files for this project and that this sheet and/or information contained herein is subject to disclosure in response to Public Records Act requests. Please do not provide information that you believe is confidential or private. If you have any questions, please ask to speak with Planning Manager Karen Brindley, (760) 744-1050 ext. 3220, or City Attorney Helen Peak, (760) 743-1226 ext. 108. Thank you.

NAME (Please print clearly)	ADDRESS (Include City and Zip Code)	PHONE # and E-mail Address	
34. DR Dwight Reimer	1195 La Moree Rd SPC 23 S.M.	858-649-9185 DocReimer@gmail.com	
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April 1, 1920

Susan Vandrew Rodriguez, Associate Planner
City of San Marcos Planning Division
1 Civic Center Drive
San Marcos CA 92078

RECEIVED

APR 04 2019

CITY OF SAN MARCOS
PLANNING DIVISION

Re: Sunrise Project

I wish to express my concerns regarding the proposed Sunrise Project. Those concerns are as follows:

- 1, Traffic congestion: Barham and Meyer are already very congested. Backed up traffic to enter the freeway and to cross the railroad tracks to Mission are already creating hazards. This section of roadway was already made more dangerous several years ago when the Sprinter began operation. It is not clear what, if any, changes will be made to alleviate this.
2. The environmental report points out how accessible the existing bus and rail lines will be. There currently are no sidewalks to facilitate pedestrian traffic, so the additional vehicle traffic might be eased but the danger getting to public transportation would be increased. Also a family residential project of this size will generate the need for school age children to get to school safely.
3. I see no mention of what will happen to the already existing storage units on the property to the north.
4. It appears that access to the proposed development will be by an existing 9 (nine) foot wide utility right of way and an as yet to be built roadway, size not known.
5. The height of the buildings to be built. This is unclear. Are the residences to be on top of the manufactured slopes? Any three story residence will not be compatible with the other residences in the area.
6. Suitability of location for residence is questionable. It doesn't appear that building a large family oriented in the middle of an industrial complex is the best choice.
7. Health concerns, both during land preparation, building and afterward should be factored in. The air pollution created by grading, etc. will impact the neighborhood to the west, most of whom are senior citizens. Those with pulmonary conditions will suffer. Noise abatement is another concern.
8. No mention is made of SDG&E's proposed plan to run a major power grid from the Escondido power plant westerly along Barham toward the Palomar airport.

Please consider all of these ideas. San Marcos is already overbuilt.

Patricia Slater
1175 La Moree Rd #70
San Marcos, CA

Patricia Slater