Hallmark-Barham Specific Plan

GPA20-0002/ SP20-0002/ RZ20-0001/ MFSDP20-0001

TSM20-0001/ CUP20-0007/ GV20-0002

Initial Study

Prepared For

City of San Marcos

1 Civic Center Drive

San Marcos, CA 92069

Project Applicant

Hall Land Company

740 Lomas Santa Fe Drive, Suite 204

Solana Beach, CA 92075

Prepared By

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PO BOX 1700

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SMA

March 2021

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1. **Project Title:**

   Hallmark-Barham Specific Plan

2. **Lead Agency Name and Address:**

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

3. **Contact Person and Phone Number:**

   Norm Pedersen, Associate Planner
   760-744-1050 ext. 3236
   npedersen@san-marcos.net

4. **Project Location:**

   The approximate 10.56-acre site is located at 943 E. Barham Drive, west of La Moree Road in the Barham/Discovery Community. The assessor parcel number (APN) is 228-310-0100. See **Figure 1** located at the end of this document. The project site is undeveloped and is sloped. Elevations range from 710 feet above mean sea level (amsl) in the southeast portion of the site to 650 feet amsl in the northwest.

5. **Project Sponsor's Name and Address:**

   Mariana McGrain
   Hall Land Company
   740 Lomas Santa Fe Drive, Suite 204
   Solana Beach, CA 92075

6. **General Plan Designation:**

   The project site has a General Plan Designation of Mixed Use 3 (MU3). The project includes a General Plan Amendment request to change the designation to Specific Plan Area (SPA).

7. **Zoning Designation:**

   The Zoning on the project site is Mixed-Use-3 (MU-3). The project includes a Rezone request to change the zoning designation to Specific Plan Area (SPA).

8. **Description of Project:**

   The project applicant is requesting approval of a General Plan Amendment (GP20-0002), Specific Plan (SP20-0002), Rezone (RZ20-0001), Multi-Family Site Development Plan (MFSDP20-0001), Tentative Subdivision Map (TSM20-0001), a Conditional Use Permit (CUP20-0007) and a Grading Variance (GV20-0002). If approved, these entitlements would allow for the development of 151 multi-family residential units.

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 Section 65450, in conjunction with the City of San Marcos Zoning Ordinance, Chapter 20.535.

The Specific Plan will be comprised of a residential land use component containing open space, as detailed below.

Residential Land Use

The project proposes 151 multi-family residential units situated on approximately 10.6 gross acres. The site plan is included as **Figure 2** at the end of this document. Residential buildings comprise approximately 2.8-acres of the project site. Multi-family residential dwelling units are comprised of one, two, and three-story condominiums with ten dwelling unit types interspersed throughout the Specific Plan area. Overall building heights will not exceed 40 feet.

The project will have a Contemporary Spanish architectural style. Proposed materials include wood, stucco, brick with decorative metal accents and trims. The project includes a variety of floor plans to allow for the articulation of the building elevations. One-story, two-story and three-story product types are included with the project. The project proposes 19 7-Plex Buildings (133 units) and six 3-plex buildings (18 units) for a total of 151 units. A 1,160 square foot (s.f.) central recreation building is also proposed that would have a kitchen, living room, dining room, California room, patio, restroom and storage area.

Open Space

There are two main categories of open space proposed for the project – common open space and private open space. Open space within the Specific Plan area will total approximately 5.35-acres. Common open space includes open space with grades 10 percent and greater, open space with grades less than ten percent, the water quality basin and recreational areas.

The other type of open space is private open space which is associated with private patio and deck areas on the residential units. The open space concept plan is included as **Figure 3** at the end of this document and **Table 1** summarizes the proposed open space areas.

Common Open Space

Common open space is divided into: 1) common open space area with grades 10 percent or greater; 2) common open space area with grades less than 10 percent; 3) the water quality basin bioretention area; and 4) recreational areas.

Common Open Space – Grades 10 Percent or Greater

The first category mentioned is common open space with grades of 10 percent or greater. According to the City of San Marcos Zoning Ordinance, open space of 10 percent grade or greater cannot be counted as usable open space. This category includes open space features such as landscaping, slopes and the water quality/biological retention areas and encompasses 141,540 s.f., of which 6,747 s.f. is associated with the water quality basin/bioretention area.

Table 1. Proposed Open Space Summary

Open Space Description	Sq. Feet Provided
Common Open Space	
Common Open Space (Grades 10 percent or greater)[(1)]	134,776[(1)]
Common Open Space (Grades less than 10 percent)	64,913[(2)]
Water Quality Basin	6,764[(1)]
Recreational Areas	10,742[(2)]
Private Open Space	
Private Open Space (Patios/Decks)	26,390

Notes:
(1) Per the Zoning Ordinance, open space areas with grades of 10 percent or greater and the water quality basin/bioretention areas do not counted as usable open space.
(2) Open space with grades of less than 10 percent and recreational areas count towards the project's usable open space calculation.

Common Open Space – Grades Less than 10 Percent

Common open space areas with grades less than 10 percent are considered to be usable open space. These areas which encourage relaxation activities such as observing nature, bird watching, painting, photography, and picnicking as well as recreational open space areas such as open turf areas. This encompasses 64,913 s.f.

Common Open Space – Water Quality Basin/Bioretention Area

The project includes a 6,764-s.f. water quality basin area. This is a passive open space area located in the northwest corner of the project site which is used to direct water during rain events to control for flooding and to treat water before it is discharged from the site. The water quality basin/bioretention area does not count towards usable common open space.

Common Open Space – Recreational Areas

The proposed project includes five recreational open space areas totaling 10,742 sq. ft., inclusive of multi-age play areas, tot lots, seating, barbeque stations, open turf areas, and patio areas. These areas will be maintained by the Home Owners Association and include:

- A 3,564 sq. ft. primary recreation area will provide residents with amenities such as a fire bowl with seating, barbeque counter and patio space, a bocce ball court, and a tot lot with seating.
- A 2,345 sq. ft. multi-age recreation area has been established adjacent to Building 12 and includes a multi-age play structure, open turf area, and bench seating.

- A 1,805 sq. ft. amenity space adjacent to Building 1 will include an enhanced paved patio area, tables with seating, open turf areas and a dog wash station.

- A 1,552 sq. ft. overlook tot lot area provided adjacent to Building 17 includes features such bench seating, a fire pit with seating and a tot lot.

- A 1,476 sq. ft. amenity space adjacent to Building 25 includes a dog wash and open turf area.

Private Open Space

Private open space within the proposed project consists of private patio space and private balcony/deck space. The City requires that each unit with ground floor living must provide 250 sq. ft. of private open space. Units with living space on the second floor and above must provide 50 sq. ft. of private open space in the form of decks or balconies. There is a total of 88 units within the proposed project that include ground floor living space and 63 units with living area on the second floor or above. Therefore, according to the City of San Marcos Zoning Ordinance, the units with ground floor living would be required to provide 22,000 sq. ft. of private patio space and the units with living space on the second floor and above would be required to provide approximately 3,150 sq. ft. of balcony/deck space. Combined, the minimum private open space required for the proposed project equates to 25,150 sq. ft. The proposed project provides a total of 26,390 s.f. of outdoor private space and will exceed the City's requirement.

Other Project Components

Access and Circulation

Access to the project site will be via two driveways on E. Barham Drive which will provide an internal loop through the project site and provide access to alleys. A secondary emergency-only access is provided through the western boundary of the project site to connect to an existing emergency access driveway on the adjacent property which connects to Saddleback Way and then to E. Barham Drive. This access point is for emergency vehicles only and bollards would be put in place. Driveways and alleys within the project site will be private. In addition, the project provides and accessible path of travel through the site and to each residence via pedestrian pathways.

Parking

The project proposes a total of 349 parking spaces. This includes 283 garage spaces associated with the units, which will be pre-wired for electric vehicle charging stations. One-bedroom units will have a one-car garage and all other units will have a two-car garage. An additional 56 outdoor parking spaces would be provided with 10 of these spaces assigned to units and 46 spaces for guests. Of those outdoor spaces, three will be ADA spaces and one electric charging station will be provided to accommodate an ADA and a non-ADA space.

Landscape Plan

The proposed landscape plan includes a mix of trees, shrubs, grasses and groundcover and the plant selection emphasizes, and moderate water use species. The project will also comply with the City's Model Water Efficient Landscape Ordinance (WELO).

Fire Fuel Modification

A 150-foot fire fuel modification buffer is included in the southern end of the project. This area will be subject to vegetation management to reduced fire fuels. For the purposes of biological resource impacts, any areas subject to ongoing vegetation management are considered to be impacted.

Project Construction

Assuming project approvals in late 2021, the project is expected to start construction in late 2022 with an occupancy of Spring 2025. Construction materials will be stored onsite.

Grading will consist of approximately 36,394 cubic yards (CY) of cut material and 91,526 CY of fill material requiring an import of approximately 46,341 CY of material. A Grading Variance is required because the project includes slopes that exceed 20 feet in height without benching. Areas where slopes are proposed to be greater than 20 feet include the southern extent of development (31.6-foot maximum slope height), a small area on the western edge of the project site (25.8-foot maximum slope height) and a portion of the project frontage with E. Barham Road (22.8-foot maximum slope height with 6 foot retaining wall).

The import and export of earth material is guided by Section 17.32.080 of the City's Municipal Code and prior to any import of soils, a haul route will be submitted for review and approval by the City Engineer. Additionally, grading and other earth moving activities are restricted to the hours of 7:00 AM and 4:30 PM, Monday through Friday, per Section 17.32.180 of the City's Municipal Code.

Due to granitic bedrock conditions, blasting and rock crushing may be required during the project grading and site preparation activities. If required, blasting would be needed in the northeast portion of the project site. The project would comply with all provisions identified in the City's Municipal Code Section 17.60.06 as it relates to blasting and blasting shall only be permitted between the hours of 9:00 AM and 4:00 PM during any weekday. The project's requested approvals include a Conditional Use Permit, which would allow for the use of the temporary rock crusher.

9. Surrounding Land Uses and Setting:

The project site is located at 943 E. Barham Drive, west of La Moree Drive in the eastern portion of the City. The project vicinity is developed primarily with residential uses. To the east of the project is the Mira Lago residential development and to the southeast is the Williamsburg residential development. West of the project site is Grace Church and the Barham Park & Ride. Southwest of the project site is residential development associated with the Walnut Hills II Specific Plan. The northern boundary of the project site is E. Barham Drive and immediately north of E. Barham Drive is landscaping, a sound wall, and the State Route 78 (SR-78). South of the project site is preserved open space, a private community park/view point and additional residences within the Williamsburg residential development.

10. Other Public Agencies Whose Approval is Required:

- Vallecitos Water District for sewer service
- Rincon del Diablo Municipal Water District for water service

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

The City has notified the tribes in accordance with Public Resources Code Section 21074. The Environmental Impact Report (EIR) will summarize the City's consultation efforts with local tribes.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Mitigated to Below a Level of Significance," as indicated by the checklist on the following pages. Detailed responses to this checklist are provided in Section IV, Environmental Analysis.

X Aesthetics

□ Agriculture and Forestry Resources

X Air Quality

X Biological Resources

X Cultural Resources

X Energy

X Geology and Soils

X Greenhouse Gas Emissions

X Hazards and Hazardous Materials

X Hydrology and Water Quality

X Land Use and Planning

□ Mineral Resources

X Noise

X Population and Housing

X Public Services

X Recreation

X Transportation

X Tribal Cultural Resources

X Utilities and Service Systems

X Wildfire

X Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Norm Pedersen, Associate Planner — Date 2/25/21

	Potentially Significant Impact	Less Than Significant 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?			**X**	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			**X**	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?	**X**			
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	**X**			

I. AESTHETICS

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The project site is located within the Barham/Discovery Community in the eastern portion of the City. The City has a Ridgeline Protection and Management Overlay Zone to protect natural viewsheds and unique natural resources, minimize physical impacts to ridgelines, and to establish innovative sensitive architectures standards. The project site is not located in the Ridgeline Protection and Management Overlay Zone. Further, the project site does not include any primary or secondary ridgelines, as identified in Figure 4-5 of the Conservation and Open Space Element of the General Plan. Therefore, development of the project site would not have a substantial adverse effect on a scenic vista and impacts would be less than significant. This topic will be analyzed in the Environmental Impact Report (EIR).

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Less than Significant Impact. The project site is located approximately 200 feet south of State Route 78 (SR-78). A portion of SR-78 is recognized as a Scenic Highway by Caltrans; however, that portion is not in the project vicinity. The portion identified as a Scenic Highway is approximately 50 miles east of the project site near Anza Borrego (Caltrans 2018). At a local level, SR-78 is designated by the City of San Marcos as a view corridor. The highway corridor provides view of the Merriam Mountains, Mount Whitney, and Double Peak. There are no scenic resources on the project site. The project site is undeveloped and does not support any historic buildings. In summary, the project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. Impacts are less than significant. This topic will be analyzed in the EIR.

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

Potentially Significant Impact. The project site is located in an urbanized area, per CEQA Guidelines Section 15387. The EIR will analyze whether the project will conflict with applicable zoning and other regulations governing scenic quality.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. There is currently no lighting on the project site. The project includes lighting for street lighting, project monuments, wayfinding and entry point locations, common areas, and pedestrian walkways. This topic will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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 Legacy Assessment Project and the 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?				**X**
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

II. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The project site is not mapped as prime farmland, unique farmland, or farmland of statewide importance, as determined by the Farmland Mapping and Monitoring Program, as shown on Figure 4-4 (Agricultural Areas) in the San Marcos General Plan (San Marcos 2012). Therefore, the project would not result in the conversion of prime farmland, unique farmland, or farmland of statewide importance. No impact is identified and this topic will not be discussed further in the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site has a General Plan designation of Mixed Use 3 (MU3) and a zoning designation of Mixed-Use-3 (MU-3). The project site does not support zoning for an agricultural use.

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The project site is not located within a Williamson Act contract area. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact is identified and this topic will not be discussed further in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The project site has a General Plan designation of Mixed Use 3 (MU3) and a zoning designation of Mixed-Use-3 (MU-3). A General Plan Amendment and Rezone is proposed for the project to change these designations to Specific Plan Area (SPA). The proposed project is not located in an area that is zoned for forest land, timber land or for timber production. Implementation of the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact is identified and this topic will not be discussed further in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site does not support forests, nor is there any forest land adjacent to the project site. The project site is developed. Therefore, the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. No impact is identified and this topic will not be discussed further in the EIR.

e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project would not result in any other changes to the existing environment that would, due to their location or nature, results in the conversion of Farmland, to non-agricultural use or conversion

of forest land to non-forest use. There is no agricultural activity on the project site or in the project vicinity. No impact is identified and this topic will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	**X**			
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?	**X**			
c) Expose sensitive receptors to substantial pollutant concentrations?	**X**			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			**X**	

III. AIR QUALITY

a) 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. The project will develop the project site with 151 multifamily residential units which will result in an increase of operational and vehicular emissions resulting in a potentially significant impact. This topic will be analyzed in the EIR.

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?

Potentially Significant Impact. Construction of the proposed project would generate air pollutant emissions from dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Following the completion of construction activities, the project would generate VOC, NOx, CO, SOx, PM10, and PM2.5 emissions from mobile sources, including vehicular traffic generated by residents of the project site; 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. An air quality report will be prepared for the project and this topic will be analyzed in the EIR.

c) 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. The project site is adjacent to existing residential uses and a Preschool at Grace Church, and because the proposed project could expose sensitive receptors to substantial pollutant concentrations, impacts are considered potentially significant. An air quality report will be prepared for the project and this topic will be analyzed in the EIR.

d) Result in other emissions such as those leading to odors 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. As a residential project, the 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 of the project site, as well as through the periodic use of landscaping or maintenance equipment. An air quality report will be prepared for the project and this topic will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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 Wildlife or U.S. Fish and Wildlife Service?	**X**			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**X**			
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	**X**			

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			**X**	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**X**			
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	**X**			

IV. BIOLOGICAL RESOURCES

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

Potentially Significant Impact. Based upon preliminary biological analysis prepared by Rocks Biological Consulting (2020), the project site includes areas of Diegan coastal sage scrub which has some potential to support the federally threatened coastal California gnatcatcher. Additionally, three special-status plant species have a moderate potential to occur on the project site: San Diego thornmint, spreading navarretia, and San Diego button-celery. Project grading activities would impact sensitive habitats and could potentially impact sensitive species if they are identified on the project site. This topic will be analyzed in the EIR.

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

Potentially Significant Impact. The project site supports non-native grassland and disturbed areas with smaller areas of Diegan coastal sage scrub and chaparral along the southern project boundary. Impacts to Diegan coastal sage scrub and chaparral would be considered significant and require mitigation. This topic will be analyzed in the EIR.

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?

Potentially Significant Impact. The EIR will analyze the potential for the project to have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption or other means.

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

Less Than Significant Impact. The project site is located in a developed portion of the City. Per Figure 4-2 (Wildlife Corridors and Linkages) of the Conservation and Open Space Element of the General Plan, the project site is not identified as a wildlife corridor. Impacts would be less than significant. This topic will still be addressed in the EIR.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Potentially Significant Impact. The proposed project site occurs within the County of San Diego Multiple Habitat Conservation Program (MHCP). The City of San Marcos has prepared a draft MHCP Subarea Plan but does not yet have an MHCP implementing agreement with the U. S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW). However, the City of San Marcos uses their Subarea Plan as a guide in project processing and mitigation planning. The proposed project site is not within a City of San Marcos MHCP focused planning area. The EIR will analyze the project's compliance with the City's draft MHCP subarea plan and applicable local policies and ordinances.

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?

Potentially Significant Impact. The City of San Marcos has prepared a draft MHCP Subarea Plan but does not yet have an MHCP implementing agreement with the USFWS or CDFW. However, the City uses their Subarea Plan as a guide in project processing and mitigation planning. The proposed project site is not within a City of San Marcos MHCP Focused Planning Area. The EIR will analyze the project's compliance with the City's draft MHCP subarea plan.

	Potentially Significant Impact	Less Than Significant 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?	**X**			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	**X**			
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	**X**			

V. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially Significant Impact. Cultural materials were observed on the site during the preliminary cultural resources field work and appear to represent the remains of an early twentieth-century

agricultural homestead. The historic debris includes material that appears to be associated with domestic kitchen use. In addition to typical residential housing foundation remains, including what appears to be a septic system, the surrounding property appears to have been graded and tiered for the purposes of agricultural cultivation. The remains of what appear to be animal cages also suggest that animals were raised either for personal use or for sale during the time that the site was occupied. Additional historic cultural material may be present below the ground surface of the site. Based on this information, the features comprising the historic site are over 50 years old, and are therefore potentially eligible for listing in the California Register of Historical Resources (CRHR). Additional analysis will be required to determine the significance of these resources and this information will be incorporated into the cultural resources report for the project and addressed in the EIR.

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

Potentially Significant Impact. Project construction activities, which includes grading and rock crushing, could have the potential to impact archaeological resources, should they be located on the project site. A cultural resources report will be prepared for the project. This topic will be analyzed in the EIR.

c) Would the project disturb any human remains, including those interred outside of formal 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 analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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?	**X**			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	**X**			

VI. 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. and petroleum use for movement of vehicles. Project operations would include the use of energy for the future multi-family residences. This topic will be analyzed in the EIR.

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

Potentially Significant Impact. The EIR will analyze if the project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

	Potentially Significant Impact	Less Than Significant 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: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**	
b) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?			**X**	
c) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?			**X**	
d) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?			**X**	
e) Result in substantial soil erosion or the loss of topsoil?			**X**	
f) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			**X**	
g) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			**X**	
h) Have soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				**X**
i) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	

VII. GEOLOGY AND SOILS

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The project site is located within a seismically active region, as is all of southern California; however, the project site not located on or adjacent to any known active faults. According to California Earthquake Hazard Zone Application, the City of San Marcos is not identified as a jurisdiction affected by Alquist-Priolo Earthquake Fault Zones (California Department of Conservation 2019). However, because the proposed project would be located in tectonically active southern California, the project would be required to comply with the California Building Code, including the recommendations for seismic safety and impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

b) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Less Than 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, including recommendations for seismic safety. Impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

c) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated, generally fine sands and silts are subjected to strong ground shaking. The soils lose shear strength and become liquid; potentially resulting in large total and differential ground surface settlements as well as possible lateral spreading during an earthquake. Seismically induced settlement can occur in response to liquefaction of saturated loose granular soils, as well as the reorientation of soil particles during strong shaking of loose, unsaturated sands.

Based upon the geotechnical report prepared for the project site (GEOCON 2020a), the risk associated with liquefaction and seismically induced settlement hazard is also low due to the dense nature and age of the underlying formational materials and lack of shallow groundwater. Impacts would be less than significant.

With regard to ground failure, United States Geological Survey maps (2016) indicate that there are no mapped Quaternary faults crossing or trending toward the property. In addition, the site is not located within a currently established Alquist-Priolo Earthquake Fault Zone. The nearest known active-fault zones are the Rose Canyon and Newport Inglewood Faults, located approximately 14 miles west of the subject site. The risk associated with ground rupture hazard is low (GEOCON 2020a). Impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

d) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Less than Significant Impact. The project site is sloped and is identified as having Low Susceptibility for soil slippage susceptibility (landslide/liquefaction) per Figure 6-1 of the Safety Element of the City's General Plan. This topic will be analyzed in the EIR.

e) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The project site is sloped. The project would be under the State Water Resources Control Board (SWRCB) General Construction Permit, which prohibits sediment or pollutant release from the project site and requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) that would incorporate erosion and sediment control measures during and after grading operations to stabilize these areas. The project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

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

Less Than Significant Impact. Based upon the geotechnical report prepared for the project (GEOCON 2020a), the project site has a low risk for landslide hazards and there are no previously mapped landslide deposits on or near the property. The risk associated with liquefaction and seismically induced settlement hazard is also low due to the dense nature and age of the underlying formational materials and lack of shallow groundwater. Impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

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

Less Than Significant Impact. Based upon the soils report prepared for the project site, the surficial soils consist of undocumented fill, topsoil, alluvium and colluvium and the formational unit is granitic rock. The soils derived from excavations within the decomposed portion of this unit typically consist of low-expansive, silty, fine- to coarse-grained sands and provide suitable foundation support in either a natural or properly compacted condition. The site does not support expansive soils, and, therefore the project would not be located on expansive soils thus creating substantial direct or indirect risk to life or property. Impacts would be less than significant. This topic will still be analyzed in the EIR as part of the geology and soils analysis.

h) Have soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Septic tanks and alternative wastewater disposal systems are not proposed as part of the project. The project will receive wastewater service from Vallecitos Water District. Therefore, no impact is identified for this issue area.

i) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Regionally, the subject property lies within the Peninsular Ranges Geomorphic Province of southern California. This province consists of a series of ranges separated by northwest trending valleys; subparallel to branches of the San Andreas Fault (CGS, 2002). The Peninsular Ranges geomorphic province is one of the largest geomorphic units in western North America, extends from the Transverse Ranges geomorphic province and the Los Angeles Basin, south to Baja California. It is bound on the west by the Pacific Ocean, on the south by the Gulf of California and on the east by the Colorado Desert Province. Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks (CGS, 2002). Major fault zones and subordinate fault zones found in the Peninsular Ranges Province typically trend in a northwest-southeast direction.

According to the USGS (2005), the project site is identified as metasedimentary and metavolcanic rocks from the Mesozoic era (MzU) which covers a wide variety of low- to high-metamorphic grade metavolcanic and metasedimentary rocks. Site analysis identified cretaceous-age granitic rock underlies the surficial deposits throughout the property. This is not a geologic formation where paleontological resources would typically be expected. The site does not contain any unique geological features. Impacts would be less than significant.

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

VIII. 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. The project would change the land use on the site from a mixed use to a residential use. 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. This topic will be analyzed in the EIR.

b) Conflict with any applicable plan, policy or regulation of an agency 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 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?	**X**			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			**X**	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			**X**	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	**X**			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				**X**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			**X**	

IX. HAZARDS AND HAZARDOUS MATERIALS

a) 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 require the transport, use, or disposal of potentially hazardous materials that are routinely used for construction and

for household uses. 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 analyzed in the EIR.

b) Create a significant hazard to the public or the environment through reasonable forseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The project site is undeveloped but has supported agricultural uses in the past. A Phase 2 ESA was conducted to check for any elevated levels of organochlorine pesticides (OCPs) and arsenic in the soils. A total of 20 soil samples were collected and were turned into five 4-part composite samples. OCPs were not detected in any of the five composite samples at concentrations exceeding the laboratory reporting detection limits (RDLs) (GEOCON 2020). Additionally, five discrete samples were analyzed for arsenic. None of the samples analyzed for arsenic detected concentrations exceeding the laboratory RDL (GEOCON 2020). Impacts would be less than significant. The results of the Phase 1 and Phase 2 ESA will be summarized in the EIR.

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

Less Than Significant Impact. The project site is located adjacent to a preschool at Grace Church. Beyond that, the closest school to the project site is Mission Hills High School, which is located 0.35 mile north of the project site, with SR-78 and additional development between the project site and the school. The residential uses proposed by the project would not be characterized as those that would emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. A Phase 1 and Phase 2 Environmental Site Assessment was prepared for the project (GEOCON 2020). As part of that document preparation, a database search 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 was performed for the project site. The site was not listed within any of these databases. However, properties within 1/8 of a mile from the site were identified. The EIR will analyzed this topic and include a summary of the Phase 1 and Phase 2 ESA. 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 nearest airport is the McClellan-Palomar Airport in Carlsbad, which is located approximately seven miles of the project site. According to Figure 6-5 of the Safety Element of the City's General Plan, the project site is located within of Review Area 2 of the airport influence area. Review Area 2 limits the heights of structures in areas of high terrain. The project site is not an area of high terrain. Area of higher elevation are located to the north and west of the site. Proposed building

would be a maximum of 40 feet high (three stories). Therefore, the project would not result in a safety hazard for people residing or working in the project area. Impacts are less than significant.

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

Less Than Significant Impact. 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, including the identification of evacuation points and general routes (City of San Marcos 2013a). The project would not result in any changes to the transportation network which could impair implementation of or physically interfere with an adopted emergency response plan. Impacts would be less than significant. This topic will be addressed in the EIR.

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

Less Than Significant Impact. The project site is located in a Local Responsibility Area with a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's San Marcos Fire Hazards Severity Zones Map (2009) and is surrounded by areas identified a Non-VHFHSZ. Further, per Figure 6-4 of the City's General Plan, the project site and surrounding area are not identified as a SMFPD Community Hazard Zone. The project includes a 150-foot fuel modification buffer along the southern portion of the project site to further minimize fire risk to the proposed development. Impact would be less than significant.

	Potentially Significant Impact	Less Than Significant 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?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there the project may impede substantial groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off-site?			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X.HYDROLOGY AND WATER QUALITY. Would the project:				
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: impede or redirect flood flows?			X	
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	X			
i) Result in significant alteration of receiving water quality during or following construction?	X			
j) Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity, and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).	X			
k) Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?	X			
l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?	X			
m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?	X			

X. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. The applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit. Regionally, this is achieved by preparing and implementing a Stormwater Quality Management Plan (SWQMP) based on the standards set forth in the 2016 Model BMP Design Manual – San Diego Region (BMP Design Manual). The project will be required to comply with the City of San Marcos BMP Design Manual. The SWQMP will require implementation of water quality best management practices (BMPs) to ensure that water quality standards are met and that stormwater runoff from construction areas do not result in a degradation of water quality in receiving water bodies. The preliminary SWQMP prepared for this project indicates the project will meet the requirements of the BMP Design Manual. As such, the potential impacts would be less than significant. However, this topic will still be analyzed in the EIR.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Implementation of the project would not use any groundwater. Therefore, the project would not substantially deplete groundwater supplies. The project will increase the amount of impervious surface on the project site; however, the project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts are less than significant. This topic will be analyzed in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The proposed project would increase the area of impervious surface on the project site through the construction of rooftops, driveways, parking lots, and concrete walkways within the project site, which could increase runoff flow rates or volumes, which could result in erosion or siltation on- or off-site. The project would be required to implement design feature to ensure that changes to drainage patterns do not result in substantial erosion, this could include offsite flow routing and hydromodification to meet City and regional standards. This topic will be analyzed in the EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. 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. The project would be required to implement design feature to ensure that changes to drainage patterns do not result in a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on-or off-site, this could include offsite flow routing and hydromodification to meet City and regional standards. This topic will be analyzed in the EIR.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, through the addition of impervious surfaces, in a manner which would: create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed above, because the proposed project would increase the area of impervious surface on the project site. The project would be required to implement design feature to ensure that changes to drainage patterns do not result in a substantial increase in the rate or amount of surface runoff which would cause runoff water to exceed the capacity of the stormwater drainage system. This could include offsite flow routing and hydromodification to meet City and regional standards. This topic will be analyzed in the EIR.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, through the addition of impervious surfaces, in a manner which would: Impede or redirect flood flows?

Less Than Significant Impact. As discussed above, because the proposed project would increase the area of impervious surface on the project site. The project will also implement a grading plan which will modify the topography of the site and could alter drainage patterns on the site. However, there are no onsite streams or rivers which would be impacted. Impacts are considered to be less than significant. This topic will be analyzed in the EIR.

g) In flood hazards, 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 Numbers 06073C0794G the project site is not located within a 100-year flood hazard area (FEMA 2012). The project site is approximately 6.5 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 standing wave) is considered negligible. No impact would occur.

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

Potentially Significant Impact. The project site is not located in a sustainable groundwater management plan area. The project site is located within the Carlsbad Management Area Water Quality Improvement Plan (WQIP). The EIR will address the project's potential to conflict with or obstruct implementation of a water quality control plan.

i) Result in significant alteration of receiving water quality during or following construction?

Potentially Significant Impact. Potential construction-related impacts associated with receiving water quality would include siltation and erosion, the use of fuels for construction equipment, and the generation of trash and debris from the construction site. During project operation, potential impacts associated with receiving water quality could include runoff associated with landscaping/outside pesticide use, pest control (indoor/structural), pools/spas/other water features, fire sprinkler test water, and runoff from parking areas and sidewalks. This represents a potentially significant impact and this topic will be analyzed in the EIR.

j) Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity, and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).

Potentially Significant Impact. The project site is located in the Carlsbad hydrologic unit (904). Impaired water bodies in this watershed, as listed in the State Water Resources Control Board (SWRCB) 303(d) impaired waters list, include San Marcos Creek (dichlorodiphenyldichloroethylene (DDE)), phosphorus, sediment toxicity, and selenium), Lake San Marcos (ammonia as nitrogen and nutrients), Batiquitos Lagoon (total coliform) and the Pacific Ocean (total coliform). The project will generate potential water quality pollutants through construction and operations. This topic will be analyzed in the EIR and implemented in the site design.

k) Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?

Potentially Significant Impact. Impaired water bodies in the Carlsbad watershed include San Marcos Creek and Lake San Marcos. While the project will include a comprehensive water quality approach including a storm drain system, there is a potential for an impact. This topic will be analyzed in the EIR.

l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?

Potentially Significant Impact. The project site is located outside of the Biological Resource Conservation area for the MHCP but is adjacent to an open space area. Additionally, runoff from the project site eventually flows to San Marcos Creek, Lake San Marcos and ultimately to Batiquitos Lagoon. This topic will be analyzed in the EIR.

m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?

Potentially Significant Impact. The project will generate pollutants both during construction and operation that could impact water quality. This topic will be analyzed in the EIR.

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

XI. LAND USE AND PLANNING

a) Physically divide an established community?

No Impact. The project site is currently undeveloped. The project proposes residential uses in an area that is already developed with similar uses, and as such, would be compatible with existing uses. The project would not physically divide an established community. No impact is identified for this issue area and this topic will not be analyzed in the EIR.

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?

Potentially Significant Impact. The project proposes to change the zoning and land use on the project site from Mixed Use 3 (MU-3) which allows for a mix of commercial and office uses to a Specific Plan for a multi-family residential development. The EIR will analyze if there is a potential for the project to cause a significant environmental impact due to a conflict with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The land use and planning section of the EIR will also include a level of service analysis to address the project's consistency with the Mobility Element of the General Plan.

	Potentially Significant Impact	Less Than Significant 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 a value to the region and the residents of the state?				**X**
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				**X**

XII. MINERAL RESOURCES

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

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

XIII. NOISE

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?

Potentially Significant Impact. Construction of the proposed project would result in temporary increases in noise due to the use of construction equipment for grading and site preparation, paving and also home construction. Due to granitic bedrock conditions, blasting and rock crushing may be required during the project grading and site preparation activities. If required, blasting would be needed in the northeast portion of the project site. The project site is located in an area of other residential uses. This could result in a significant temporary impact in ambient noise levels. During operations, the proposed project would generate noise through introduction of traffic on site and in the project vicinity, and an increase on stationary source noise, such as increased human presence on-site. As such, impacts are considered potentially significant. A noise report will be prepared for the project and this topic will be analyzed in the EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction activities associated with the project, which could include blasting and the use of a temporary rock crusher, could result in the generation of groundborne vibration or noise levels. Additionally, the Noise Element of the General Plan identifies adjacent SR-78 as a noise

source which may impact the project. Impacts are considered potentially significant. This topic will be analyzed in the EIR.

c) For a project located within an airport land use plan within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The 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 7.5 miles to the 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 not be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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)?	**X**			
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				**X**

XIV. POPULATION AND HOUSING

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)?

Potentially Significant Impact. The project site is currently zoned MU-3, which allows for a mix of commercial and office uses on the project site. The project is proposing a General Plan Amendment and rezone to change the site to a Specific Plan Area and develop multi-family residential uses. The EIR will analyze the potential for inducted substantial unplanned population growth due to the project.

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

No Impact. There is no existing housing on the project site. Therefore, the project will not remove existing housing. The project proposes 151 housing units which would add to the housing stock in the City. No impact is identified for this issue area.

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

XV. PUBLIC SERVICES

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

a) Fire protection?

Potentially Significant Impact. The project site would be served by the San Marcos Fire Department. Implementation of the proposed project would increase demand on fire protection and emergency response services due to the construction of 151 residential units on the project site. This could result in a significant increase in demand on fire protection services and result in a potentially significant impact. The project will be required to annex into a Community Facilities District for Fire and Paramedic service. This topic will be analyzed in the EIR.

b) Police protection?

Potentially Significant Impact. The project site would be served by the San Marcos Sheriff's Department for police protection services. Implementation of the proposed project would increase demand on police protection services due to the construction of 151 residential units on the project site. This could result in a significant increase in demand on police protection services and result in a potentially significant impact. The project will be required to annex into a Community Facilities District for Police service. This topic will be analyzed in the EIR.

c) Schools?

Potentially Significant Impact. The project site is located within the service boundary of the San Marcos Unified School District (SMUSD) and is within the current attendance boundaries of San Marcos Elementary School, San Marcos Middle School and Mission Hills High School. As part of the EIR preparation, SMUSD will be contacted to confirm the schools that would serve the project and the ability

of SMUSD to house the students at these schools. The project will also be required to pay applicable school fees to SMUSD prior to the issuance of building permits. This topic will be analyzed in the EIR.

d) Parks?

Less Than Significant. The project proposes residential uses which can result in an increase in demand on neighborhood and regional parks. The closest parks to the project site are the Alder Glen Tot Lot and Jack's Pond Park. The project design includes five common-area recreation spaces totaling 7,185 sq. ft. to meet the recreation needs of future residents. Theses spaces include multi-age play areas, tot lots, seating, barbeque stations, open turf areas, and patio areas. A central recreation building with a kitchen area, seating, dining area, California room, patio and restrooms is also part of the project design. Additionally, the project will pay Public Facility Fees (PFF), a portion of which goes toward funding City-wide park and recreation facilities. Impacts would be less than significant. This topic will still be analyzed in the EIR.

e) Other public facilities?

Potentially Significant Impact. The EIR will analyze if the project has the potential to impact any other public facilities.

	Potentially Significant Impact	Less Than Significant 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?			**X**	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			**X**	

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?

Less Than Significant Impact. The project proposes residential uses which can result in an increase in demand on neighborhood and regional parks. The project design includes five common-area recreation spaces totaling 7,185 sq. ft. to meet the recreation needs of future residents. Theses spaces include multi-age play areas, tot lots, seating, barbeque stations, open turf areas, and patio areas. A central recreation building with a kitchen area, seating, dining area, California room, patio and restrooms is also part of the project design. Additionally, the project will pay PFF fees, a portion of which goes toward funding City-wide park and recreation facilities. Impacts would be less than significant. This topic will be analyzed in the EIR.

b) Does the project include any recreational facilities or require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The project proposes residential uses which can result in an increase in demand on neighborhood and regional parks. The project design includes five common-area recreation spaces totaling 7,185 sq. ft. to meet the recreation needs of future residents and a central recreation building. These amenities are included the overall project footprint and would be captured as part of the environmental impact analysis of the overall project design. This topic will be analyzed in the EIR.

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

XVII. TRANSPORTATION

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

Potentially Significant Impact. Construction of the proposed project would result in trips associated with construction workers and supply and materials deliveries to the site. During operations, the proposed project would generate traffic potentially impacting the existing roadway network through the development of 151 multi-family residential units. Project-generated traffic would also result in an increase 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 analyzed in the EIR.

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

Potentially Significant Impact. CEQA Guidelines section 15064.3 establishes VMT as the most appropriate measure of transportation impacts, shifting away from the level of service analysis that evaluated a project's impacts on traffic conditions on nearby roadways and intersections. Implementation of the proposed project would contribute traffic to the existing roadway network and increase VMT. As such, impacts are considered potentially significant. This topic will be analyzed in the EIR.

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

Less Than Significant Impact. 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 analyzed in the EIR.

d) 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 in terms of dimensions and surfaces (Chapter 5, § 503.1 through 503.4 of the California Fire Code). The project proposes a primary entrance from E. Barham Drive. This topic will be analyzed in the EIR.

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

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: 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 local Tribes in accordance with Public Resources Code section 21074. Tribal consultation input will be considered throughout the environmental document preparation process. This topic will be analyzed in the EIR.

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

Potentially Significant Impact. As discussed above, the City has notified local Tribes in accordance with Public Resources Code section 21074. Tribal consultation input will be considered throughout the environmental document preparation process. This topic will be analyzed in the EIR.

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

XIX. UTILITIES AND SERVICE SYSTEMS

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

Potentially Significant Impact. The proposed project will result in an increase in demand for water, wastewater, energy and telecommunication services. The project site is within the service area of Rincon Del Diablo Water District (RDDWD) for potable water service, Vallecitos Water District (VWD) for wastewater service, San Diego Gas & Electric (SDG&E) for natural gas and electricity service and Cox Communications for telephone and cable service. Stormwater drainage and detention onsite would be the responsibility of the project applicant and stormwater flows would eventually enter City of San Marcos stormwater infrastructure. The project will result in an increase in demand of utility resources an infrastructure. This represents a potentially significant impact and this topic will be analyzed in the EIR.

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

Potentially Significant Impact. Water service for potable residential use and fire service would be provided by RDDWD. Development of the project site with 151 residential units will result in an increase in demand of water supply. This represents a potentially significant impact. This topic will be analyzed in the EIR.

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?

Potentially Significant Impact. The project site is within the service area of VWD for wastewater service. Development of the project site with 151 residential units will result in an increase in demand for wastewater treatment to serve the future residences. This could result in a potentially significant impact. A sewer study will be prepared by VWD for the project, which will include an analysis of wastewater treatment capacity. This topic will be analyzed in the EIR.

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?

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 generate solid waste from future residences. As such, impacts are considered potentially significant. This topic will be analyzed in the EIR.

e) 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 analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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 zone, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	**X**			
b) Due to slope, prevailing wind, and other factors, exacerbate wildlife risk, and thereby expose project occupants to, pollutant concentrations from a wildlife or the uncontrolled spread of wildlife?	**X**			
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment?	**X**			
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslide, as a result of runoff, post-fire slope instability, or drainage changes?	**X**			

XX. WILDFIRE

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zone, would the project:

- ***Substantially impair an adopted emergency response plan or emergency evacuation plan?***
- ***Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***
- ***Require the installation of 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?***
- ***Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

Potentially Significant Impact. The project site is located in a Local Responsibility Area with a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's San Marcos Fire Hazards Severity Zones Map (2009) and is surrounded by areas identified a Non-VHFHSZ. Further, per Figure 6-4 of the City's General Plan, the project site and surrounding area are not identified as a SMFPD Community Hazard Zone. The project includes a 150-foot fuel modification buffer along the southern portion of the project site to further minimize fire risk to the proposed development, however the potential for wildfire risk will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant 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?	**X**			
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.)	**X**			
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	**X**			

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact. The project has the potential to directly and indirectly impact biological resources and to potentially impact archaeological resources. As such, impacts are potentially significant and this topic will be analyzed in the EIR.

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. Cumulative Impacts are considered potentially significant and will be 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. These topics will be analyzed in the EIR.

PREPARERS

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

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REFERENCES

California Department of Conservation. 2019. Alquist-Priolo Earthquake Fault Zones. https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

CalFire. 2009. Very High Fire Hazard Severity Zone in LRA as Recommended by CAL FIRE (for San Marcos). https://osfm.fire.ca.gov/media/5970/san_marcos.pdf

Caltrans. 2020. Officially Designated State Scenic Highways. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

City of San Marcos (City). 2001. Natural Community Conservation Plan for the City of San Marcos. San Marcos Subarea Plan Public Review Draft.

City of San Marcos. 2012. General Plan http://www.san-marcos.net/work/economic-development/general-plan

Federal Emergency Management Agency (FEMA). 2012. Flood Insurance Rate Map No. 06073C0794G.

GEOCON Incorporated (GEOCON). 2020a. Geotechnical Investigation. 943 Barham Drive, San Marcos, California. June 17.

GEOCON. 2020b. Phase I and Phase II Environmental Site Assessment Report. 943 Barham Drive, San Marcos, California. March 9.

Rocks Biological Consulting. 2020. Preliminary Constraints Report for the Barham Drive Residential Project, San Marcos. April 3.

San Diego County Regional Airport Authority, Airport Land Use Commission (SDCRAA-ALUC). 2010. McClellan-Palomar Airport Land Use Compatibility Plan. January 25. Amended March 4, 2010 and December 1, 2011.

United States Geologic Survey (USGS). 2005. Geologic Map of Oceanside 30'X60' Quadrangle.

Figure 1. Project Location

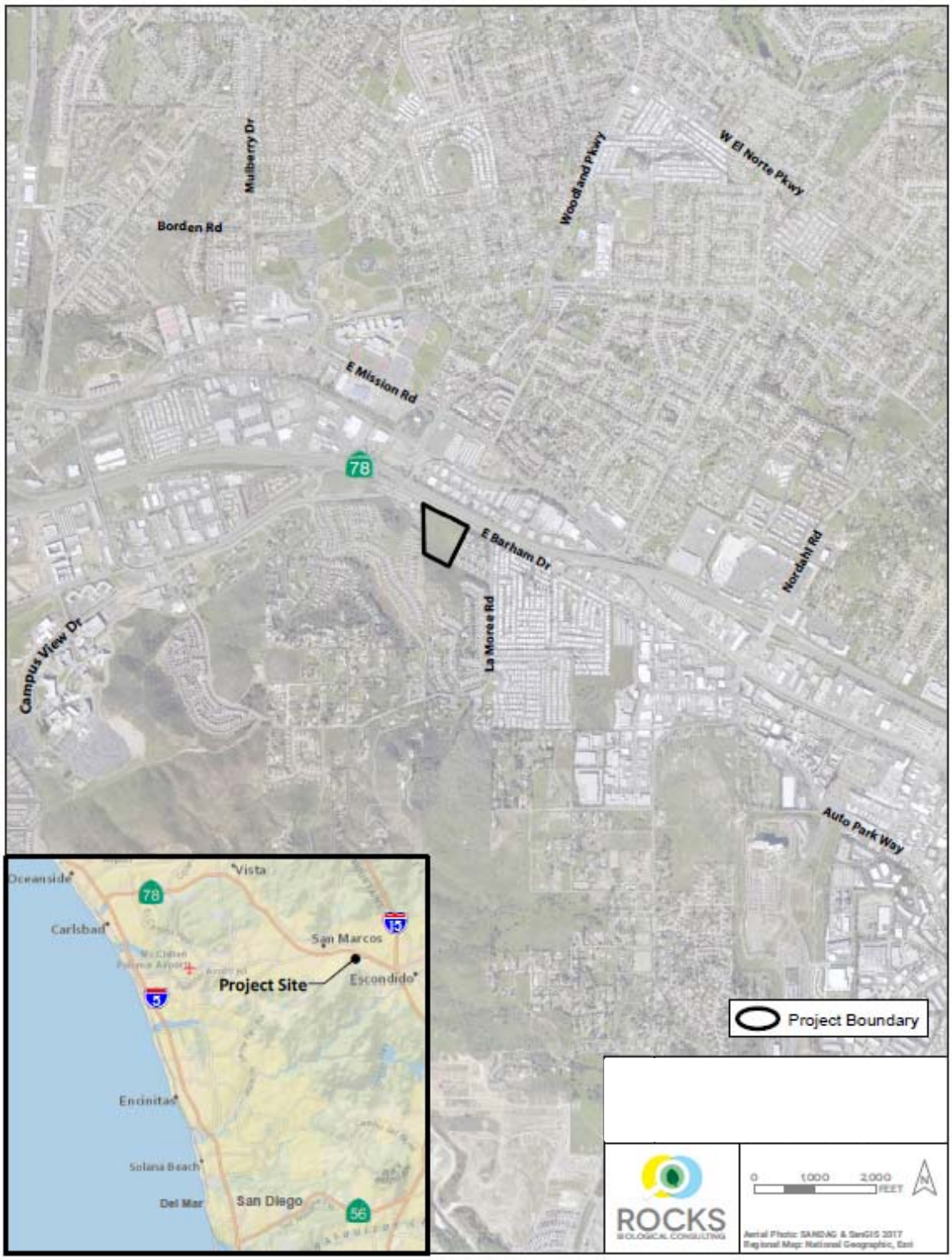


Figure 2. Site Plan

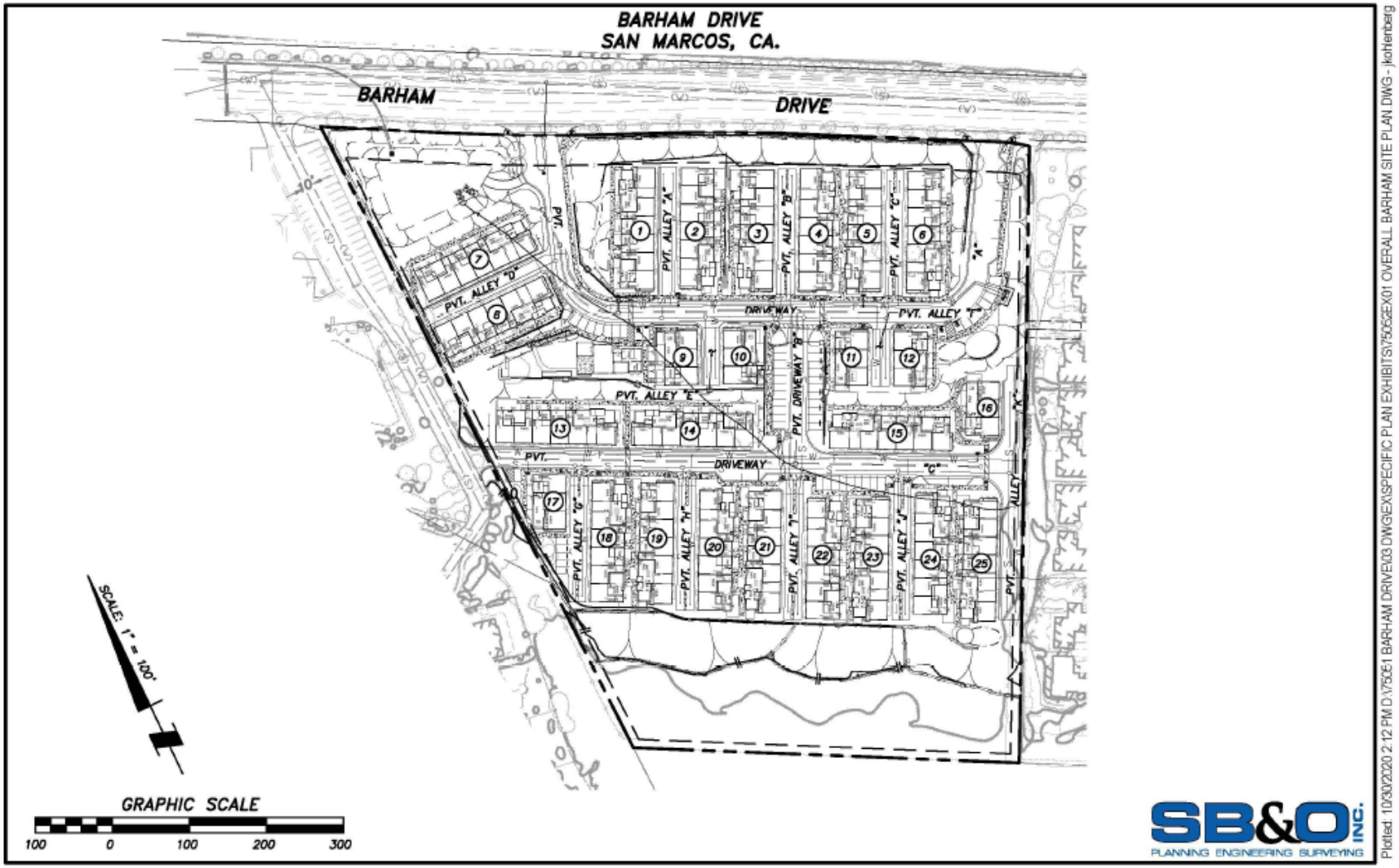
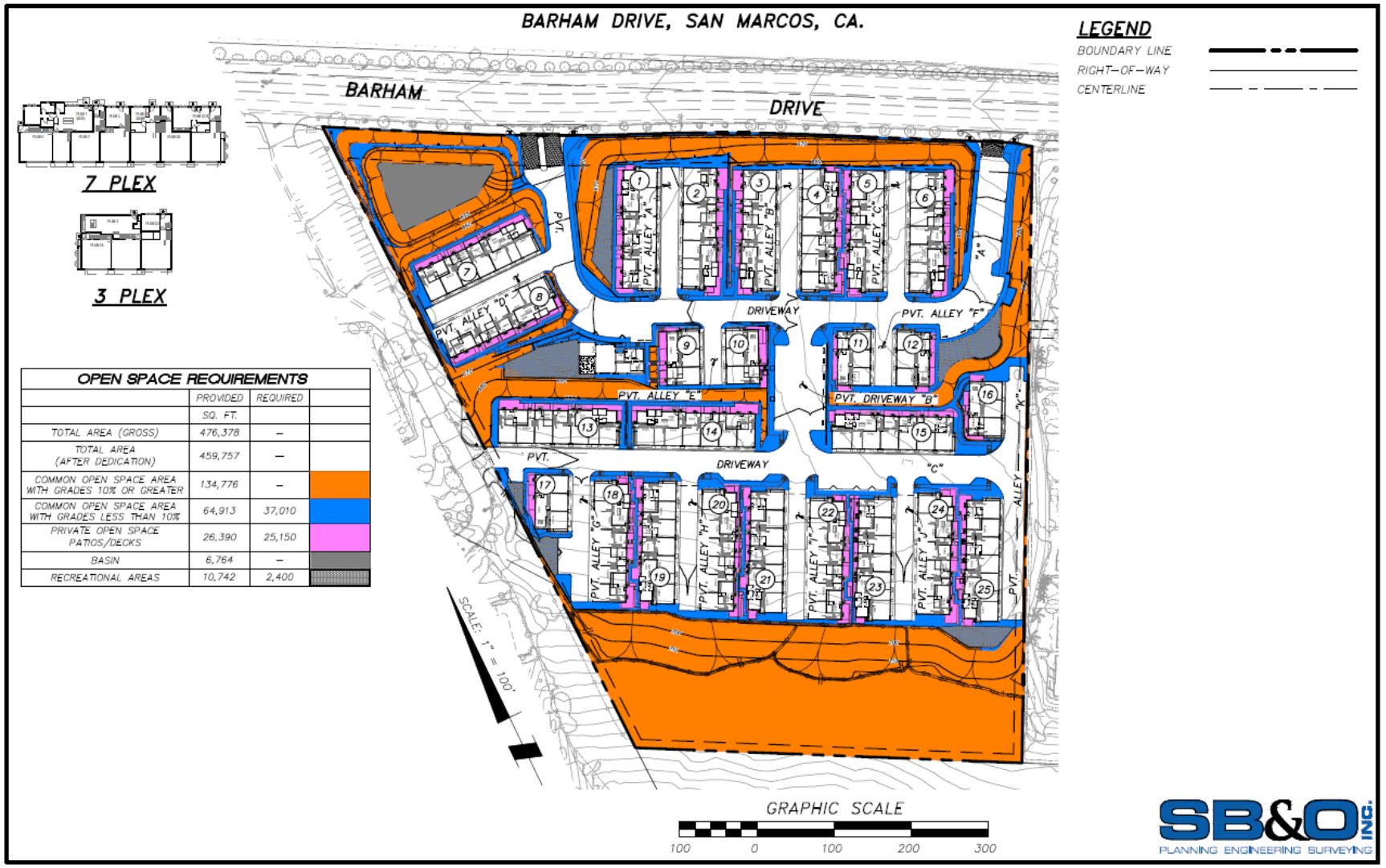


Figure 3. Open Space



OPEN SPACE REQUIREMENTS			
	PROVIDED	REQUIRED	
	SQ. FT.		
TOTAL AREA (GROSS)	476,378	–	
TOTAL AREA (AFTER DEDICATION)	459,757	–	
COMMON OPEN SPACE AREA WITH GRADES 10% OR GREATER	134,776	–	
COMMON OPEN SPACE AREA WITH GRADES LESS THAN 10%	64,913	37,010	
PRIVATE OPEN SPACE PATIOS/DECKS	26,390	25,150	
BASIN	6,764	–	
RECREATIONAL AREAS	10,742	2,400	