North Iris Residential Project
Environmental Impact Report

SCH #2021060702

City Case Nos: PHG 20-0032, PL 20-0738, PL 20-0739,
PL 21-0126, PL 21-0127, PL 21-0128

Volume I
September 2022

Prepared for:

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025
Contact: Jay Paul

Prepared by:

Sophia Mitchell & Associates
P.O. Box 1700
Gualala, CA 95445
Contact: Sophia Habl Mitchell

Table of Contents

Table of Contents i

Acronyms x

0.0 Executive Summary 0-1

0.1 Project Summary 0-1

0.2 Summary of Significant Effects/Mitigation 0-1

0.3 Areas of Controversy 0-4

0.4 Issues to be Resolved 0-4

0.5 Project Alternatives 0-5

0.5.1 No Project/No Development Alternative 0-5

0.5.2 No Project/Existing Escondido General Plan Land Use Designation Alternative 0-5

0.5.3 No Project/Existing San Diego County General Plan Land Use Designation Alternative 0-6

0.5.4 Reduced Footprint Alternative 0-7

0.6 Environmentally Superior Alternative 0-7

1.0 Introduction 1-1

1.1 Intended Use and Purpose of the EIR 1-1

1.2 Scope of the EIR 1-1

1.3 Lead, Responsible and Trustee Agencies 1-2

1.4 Environmental Review Process 1-2

1.4.1 Draft EIR 1-2

1.4.2 Final EIR 1-3

1.5 Document Organizations 1-3

1.5.1 Volume I 1-3

1.5.2 Volume II 1-4

2.0 Project Description 2-1

2.1 Introduction 2-1

2.2 Project Location and Environmental Setting 2-1

2.3 Project Site History 2-2

2.4 Statement of Project Objectives 2-2

2.5 Project Components 2-2

2.5.1 Residential 2-2

2.5.2 Open Space and Recreation 2-3

2.5.3 Fencing, Walls and Lighting 2-3

2.5.4 Access, Circulation and Parking 2-4

2.5.5 Roadway Improvements 2-5

2.5.6 Site Drainage 2-5

2.5.7 Utilities and Public Services 2-5

2.5.8 Landscaping 2-6

2.5.9 Demolition, Grading and Construction 2-7

2.6 Discretionary Actions 2-7

2.7 List of Past, Present and Reasonably Anticipated Future Projects in the Project Area 2-8

3.0 Environmental Impact Analysis 3-1
3.1 Aesthetics 3.1-1
3.1.1 Existing Conditions 3.1-1
3.1.2 Regulatory Framework 3.1-2
3.1.3 Thresholds of Significance 3.1-4
3.1.4 Project Impact Analysis 3.1-4
3.1.5 Cumulative Impact Analysis 3.1-8
3.1.6 Mitigation Measures 3.1-8
3.1.7 Conclusion 3.1-8
3.2 Air Quality 3.2-1
3.2.1 Existing Conditions 3.2-1
3.2.2 Regulatory Framework 3.2-6
3.2.3 Thresholds of Significance 3.2-14
3.2.4 Project Impact Analysis 3.2-14
3.2.5 Cumulative Impact Analysis 3.2-20
3.2.6 Mitigation Measures 3.2-21
3.2.7 Conclusion 3.2-21
3.3 Biological Resources 3.3-1
3.3.1 Existing Conditions 3.3-1
3.3.2 Regulatory Framework 3.3-7
3.3.3 Thresholds of Significance 3.3-13
3.3.4 Project Impact Analysis 3.3-14
3.3.5 Cumulative Impact Analysis 3.3-19
3.3.6 Mitigation Measures 3.3-20
3.3.7 Conclusion 3.3-22
3.4 Cultural Resources/Tribal Cultural Resources 3.4-1
3.4.1 Existing Conditions 3.4-1
3.4.2 Regulatory Framework 3.4-10
3.4.3 Thresholds of Significance 3.4-20
3.4.4 Project Impact Analysis 3.4-20
3.4.5 Cumulative Impact Analysis 3.4-23
3.4.6 Mitigation Measures 3.4-24
3.4.7 Conclusion 3.4-28
3.5 Energy 3.5-1
3.5.1 Existing Conditions 3.5-1
3.5.2 Regulatory Framework 3.5-4
3.5.3 Thresholds of Significance 3.5-11
3.5.4 Project Impact Analysis 3.5-11
3.5.5 Conflict with Renewable Energy Plans 3.5-17
3.5.6 Cumulative Impact Analysis 3.5-17
3.5.7 Mitigation Measures 3.5-17
3.5.8 Conclusion 3.5-18
3.6 Geology and Soils 3.6-1
3.6.1 Existing Conditions 3.6-1
3.6.2 Regulatory Framework 3.6-5
3.6.3 Thresholds of Significance 3.6-7

3.6.4 Project Impact Analysis *3.6-8*
3.6.5 Cumulative Impact Analysis *3.6-12*
3.6.6 Mitigation Measures *3.6-13*
3.6.7 Conclusion *3.6-13*
3.7 Greenhouse Gas Emissions 3.7-1
3.7.1 Existing Conditions *3.7-1*
3.7.2 Regulatory Framework *3.7-1*
3.7.3 Thresholds of Significance *3.7-11*
3.7.4 Project Impact Analysis *3.7-12*
3.7.5 Cumulative Impact Analysis *3.7-16*
3.7.6 Mitigation Measures *3.7-17*
3.7.7 Conclusion *3.7-17*
3.8 Hazards and Hazardous Materials 3.8-1
3.8.1 Existing Conditions *3.8-1*
3.8.2 Regulatory Framework *3.8-3*
3.8.3 Thresholds of Significance *3.8-11*
3.8.4 Project Impact Analysis *3.8-12*
3.8.5 Cumulative Impact Analysis *3.8-17*
3.8.6 Mitigation Measures *3.8-18*
3.8.7 Conclusion *3.8-19*
3.9 Hydrology and Water Quality 3.9-1
3.9.1 Existing Conditions *3.9-1*
3.9.2 Regulatory Framework *3.9-2*
3.9.3 Thresholds of Significance *3.9-8*
3.9.4 Project Impact Analysis *3.9-9*
3.9.5 Cumulative Impact Analysis *3.9-17*
3.9.6 Mitigation Measures *3.9-18*
3.9.7 Conclusion *3.9-18*
3.10 Land Use and Planning 3.10-1
3.10.1 Existing Conditions *3.10-1*
3.10.2 Regulatory Framework *3.10-2*
3.10.3 Thresholds of Significance *3.10-8*
3.10.4 Project Impact Analysis *3.10-8*
3.10.5 Cumulative Impact Analysis *3.10-11*
3.10.6 Mitigation Measures *3.10-11*
3.10.7 Conclusion *3.10-11*
3.11 Noise 3.11-1
3.11.1 Existing Conditions *3.11-1*
3.11.2 Regulatory Framework *3.11-4*
3.11.3 Thresholds of Significance *3.11-11*
3.11.4 Project Impact Analysis *3.11-12*
3.11.5 Cumulative Impact Analysis *3.11-21*
3.11.6 Mitigation Measures *3.11-23*
3.11.7 Conclusion *3.11-24*
3.12 Population and Housing 3.12-1
3.12.1 Existing Conditions *3.12-1*

3.12.2 Regulatory Framework *3.12-1*
3.12.3 Thresholds of Significance *3.12-6*
3.12.4 Project Impact Analysis *3.12-6*
3.12.5 Cumulative Impact Analysis *3.12-7*
3.12.6 Mitigation Measures *3.12-8*
3.12.7 Conclusion *3.12-8*
3.13 Public Services 3.13-1
3.13.1 Existing Conditions *3.13-1*
3.13.2 Regulatory Framework *3.13-3*
3.13.3 Thresholds of Significance *3.13-6*
3.13.4 Project Impact Analysis *3.13-7*
3.13.5 Cumulative Impact Analysis *3.13-10*
3.13.6 Mitigation Measures *3.13-12*
3.13.7 Conclusion *3.13-12*
3.14 Recreation 3.14-1
3.14.1 Existing Conditions *3.14-1*
3.14.2 Regulatory Framework *3.14-1*
3.14.3 Thresholds of Significance *3.14-3*
3.14.4 Project Impact Analysis *3.14-3*
3.14.5 Cumulative Impact Analysis *3.14-5*
3.14.6 Mitigation Measures *3.14-6*
3.14.7 Conclusion *3.14-6*
3.15 Transportation 3.15-1
3.15.1 Existing Conditions *3.15-1*
3.15.2 Regulatory Framework *3.15-6*
3.15.3 Thresholds of Significance *3.15-13*
3.15.4 Project Impact Analysis *3.15-14*
3.15.5 Cumulative Impact Analysis *3.15-24*
3.15.6 Mitigation Measures *3.15-25*
3.15.7 Conclusion *3.15-26*
3.16 Utilities and Service Systems 3.16-1
3.16.1 Existing Conditions *3.16-1*
3.16.2 Regulatory Framework *3.16-9*
3.16.3 Thresholds of Significance *3.16-15*
3.16.4 Project Impact Analysis *3.16-15*
3.16.5 Cumulative Impact Analysis *3.16-21*
3.16.6 Mitigation Measures *3.16-22*
3.16.7 Conclusion *3.16-22*
4.0 Other CEQA Considerations 4-1
4.1 Significant and Unavoidable Impacts 4-1
4.2 Growth Inducement 4-1
4.2.1 Direct Population Growth *4-2*
4.2.2 Economic Growth *4-2*
4.2.3 Removing Obstacles to Growth *4-2*
4.3 Effects Found Not to be Significant 4-3

4.4 Significant Irreversible Environmental Changes 4-4
4.5 Significant Unavoidable Impacts 4-5
5.0 Alternatives 5-1
5.1 Introduction to Alternatives 5-1
5.2 Project Objectives 5-1
5.3 Project Alternatives Considered in this EIR 5-2
5.3.1 Description of Alternatives 5-2
5.3.2 Summary of Impacts 5-2
5.3.3 No Project/No Development Alternative 5-3
5.3.4 No Project/Existing Escondido General Plan Land Use Designation Alternative 5-8
5.3.5 No Project/Existing San Diego County General Plan Land Use Designation Alternative 5-13
5.3.6 Reduced Footprint Alternative 5-18
5.4 Alternatives Considered But Rejected 5-23
5.4.1 Alternative Location 5-23
5.5 Environmentally Superior Alternative 5-24
6.0 References 6-1
7.0 Mitigation Measures, Project Design Features and Compliance Measures 7-1
7.1 Aesthetics 7-1
7.1.1 Mitigation Measures 7-1
7.1.2 Project Design Features 7-1
7.1.3 Compliance Measures 7-1
7.2 Air Quality 7-1
7.2.1 Mitigation Measures 7-1
7.2.2 Project Design Features 7-1
7.2.3 Compliance Measures 7-2
7.3 Biological Resources 7-2
7.3.1 Mitigation Measures 7-2
7.3.2 Project Design Features 7-3
7.4 Cultural Resources/Tribal Cultural Resources 7-4
7.4.1 Mitigation Measures 7-4
7.5 Energy 7-7
7.5.1 Mitigation Measures 7-7
7.5.2 Project Design Features 7-7
7.6 Geology and Soils 7-8
7.6.1 Mitigation Measures 7-8
7.6.2 Project Design Features 7-8
7.7 Greenhouse Gas 7-8
7.7.1 Mitigation Measures 7-8
7.7.2 Project Design Features 7-8
7.7.3 Compliance Measures 7-9
7.8 Hazards and Hazardous Materials 7-9
7.8.1 Mitigation Measures 7-9
7.8.2 Project Design Features 7-9
7.8.3 Compliance Measures 7-10

7.9 Hydrology and Water Quality 7-10
7.9.1 Mitigation Measures *7-10*
7.9.2 Project Design Features *7-10*
7.10 Noise 7-10
7.10.1 Mitigation Measures *7-10*
7.10.2 Project Design Features *7-11*
7.10.3 Compliance Measures *7-11*
7.11 Public Services 7-11
7.11.1 Mitigation Measures *7-11*
7.11.2 Compliance Measures *7-11*
7.12 Recreation 7-12
7.12.1 Mitigation Measures *7-12*
7.12.2 Compliance Measures *7-12*
7.13 Transportation 7-12
7.13.1 Mitigation Measures *7-12*
7.13.2 Project Design Features *7-13*
7.13.3 Compliance Measures *7-13*
7.14 Utilities and Service Systems 7-13
7.14.1 Mitigation Measures *7-13*
7.14.2 Project Design Features *7-13*
7.14.3 Compliance Measures *7-13*
8.0 List of Preparers 8-1

Figures

Figure 2-1. Regional Map 2-10
Figure 2-2. Project Vicinity 2-11
Figure 2-3. Topographic Map 2-12
Figure 2-4. Conceptual Site Plan 2-13
Figure 2-5. Architectural Concepts (4 Plex Conventional Homes) 2-14
Figure 2-6. Architectural Concepts (5 Plex Conventional Homes) 2-15
Figure 2-7. Architectural Concepts (6 Plex Conventional Homes) 2-16
Figure 2-8. Architectural Concepts (4-Plex Alley Homes) 2-17
Figure 2-9. Architectural Concepts (5-Plex Alley Homes) 2-18
Figure 2-10. Architectural Concepts (6-Plex Alley Homes) 2-19
Figure 2-11. Open Space Exhibit 2-20
Figure 2-12. Conceptual Fence and Wall Plan 2-21
Figure 2-13. Conceptual Landscape Plan 2-22
Figure 2-14. Conceptual Landscape Plan (Outdoor Workout Area and Project Entry) 2-23
Figure 2-15. Conceptual Landscape Plan (Amenity Space, Tot Lot and Historical Node) 2-24
Figure 2-16. Conceptual Landscape Plan (North Iris/Robin Hill Lane) 2-25
Figure 2-17. Cumulative Projects 2-26
Figure 3.2-1. Cumulative Projects 3.2-24
Figure 3.3-1. Existing Vegetation Communities and Land Cover Types 3.3-24

Figure 3.3-2. Potential CDFW Jurisdictional Resources 3.3-25
Figure 3.3-3. Potential USACE Jurisdictional Resources 3.3-26
Figure 3.3-4. Potential RWQCB Jurisdictional Resources 3.3-27
Figure 3.3-5. Proposed Project Vegetation Impacts 3.3-28
Figure 3.3-6. Oak Tree Impacts 3.3-29
Figure 3.4-1. 2039 North Iris Lane 3.4-30
Figure 3.4-2. 2047 North Iris Lane 3.4-30
Figure 3.4-3. 2085 North Iris Lane 3.4-31
Figure 3.4-4. 2089 North Iris Lane 3.4-31
Figure 3.11-1. Ambient Noise Monitoring Location 3.11-26
Figure 3.11-2. Locations of Proposed HVAC Units 3.11-27
Figure 3.11-3. Modeled Receptor Locations 3.11-28
Figure 3.13-1. Public Facilities 3.13-14
Figure 3.15-1. Pedestrian Facilities in Project Vicinity 3.15-29
Figure 3.15-2. Existing and Proposed Bicycle Facilities Within 1-Mile of Project Site 3.15-30
Figure 3.15-3. Existing Roadway Conditions 3.15-31

Tables

Table ES-1. Summary of Significant Environmental Impacts 0-1
Table ES-2. Comparison of Impacts of Proposed Project and Alternatives 0-8
Table 2-1. Proposed Open Space 2-3
Table 2-2. Cumulative Projects 2-9
Table 3.2-1. San Diego County Air Basin Attainment Status by Pollutant 3.2-2
Table 3.2-2. Two-Year Ambient Air Quality Summary Near the Project Site 3.2-3
Table 3.2-3. Ambient Air Quality Standards 3.2-7
Table 3.2-4. Screening-Level Criteria for Air Quality Impacts 3.2-13
Table 3.2-5. Construction Emissions (lbs/day) 3.2-16
Table 3.2-6. Operational Emissions (lbs/day) 3.2-17
Table 3.3-1. Existing Vegetation Communities and Land Covers Within the Project Site 3.3-2
Table 3.3-2. Waters of the United States Within the Project Site 3.3-5
Table 3.3-3. CDFW Jurisdiction Within the Project Site 3.3-5
Table 3.3-4. Project Impacts to Vegetation Communities/ Land Cover Types 3.3-15
Table 3.3-5. Project Impacts to USACE/ RWQCB Jurisdiction 3.3-16
Table 3.3-6. Project Impacts to CDFW Jurisdiction 3.3-16
Table 3.3-7. Protected and Mature Oak Trees Located Within and Adjacent to the Project Site 3.3-18
Table 3.5-2 Hours of Operation for Construction Equipment 3.5-13
Table 3.5-3 Construction Equipment Diesel Demand 3.5-13
Table 3.5-4 Construction Worker Vehicle Gasoline Demand 3.5-14
Table 3.5-5 Construction Vendor Truck Diesel Demand 3.5-15
Table 3.5-6 Construction Haul Truck Diesel Demand 3.5-15
Table 3.5-7 Mobile Source Fuel Consumption - Operation 3.5-16
Table 3.7-1. Expected Annual Construction CO_2e Emissions Summary 3.7-13
Table 3.7-2. Proposed Project Operational Emissions Summary (MT/Year) 3.7-15
Table 3.10-1. Project Consistency with Applicable Escondido General Plan Goals and Policies 3.10-12
Table 3.11-1. Measured Ambient Noise Levels 3.11-3
Table 3.11-2. Groundborne Vibration and Noise Impact Criteria (Human Annoyance) 3.11-4
Table 3.11-3. Groundborne Vibration Impact Criteria (Structural Damage) 3.11-5

Table 3.11-4 Land Use Compatibility Standards....3.11-7
Table 3.11-5. City of Escondido Exterior Sound Limit Levels....3.11-9
Table 3.11-6. Construction Noise Levels....3.11-13
Table 3.11-7. Construction Noise Levels from Rock Drilling....3.11-14
Table 3.11-8. Project HVAC Noise Levels (Nearest Property Line)....3.11-16
Table 3.11-9. Future Traffic Parameters....3.11-16
Table 3.11-10. Future Exterior Noise Levels (Ground Level)....3.11-17
Table 3.11-11. Existing Noise Levels....3.11-19
Table 3.11-12. Existing + Project Noise Levels....3.11-19
Table 3.11-13. Existing vs. Existing + Project Noise Levels....3.11-19
Table 3.11-14. Vibration Levels from Construction Activities (Residential Receptors)....3.11-20
Table 3.11-15. Existing + Project + Cumulative Noise Levels....3.11-23
Table 3.11-16. Existing VS. Existing + Project + Cumulative Noise Levels....3.11-23
Table 3.12-2. Forecasted Growth for the San Diego Region and the City of Escondido....3.12-4
Table 3.12-3 City of Escondido Summary of RHNA Status....3.12-4
Table 3.13-1. Escondido Fire Stations....3.13-1
Table 3.13-2. Enrollment and Capacity by School....3.13-9
Table 3.14-1. Proposed Open Space....3.14-3
Table 3.15-1: Intersection Level of Service Definitions....3.15-3
Table 3.15-2: Street Segment Daily Capacity and LOS (City of Escondido)....3.15-3
Table 3.15-3 Existing Intersection Level of Service....3.15-5
Table 3.15-4. Existing Segment Volumes and Level of Service....3.15-5
Table 3.15-5. City of Escondido Level of Service Thresholds....3.15-13
Table 3.15-6. Project Trip Generation....3.15-15
Table 3.15-7. Project Construction Traffic Generation (Highest Phase)....3.15-16
Table 3.15-8. Existing Plus Project Intersection Level of Service....3.15-17
Table 3.15-9. Existing Plus Project Segment Volumes and Level of Service....3.15-17
Table 3.15-10. Near Term Without Project Intersection Level of Service....3.15-18
Table 3.15-11. Near Term Without Project Segment Volumes and Level of Service....3.15-19
Table 3.15-12. Near Term Plus Project Intersection Level of Service....3.15-19
Table 3.15-13. Near Term Plus Project Segment Volumes and Level of Service....3.15-20
Table 3.15-14. Long Term Year 2035 Plus Project Intersection Level of Service....3.15-21
Table 3.15-15. Long Term Year 2035 Plus Project Segment Volumes and Level of Service....3.15-22
Table 3.15-16. City of Escondido Project Thresholds for VMT Transportation Impacts....3.15-23
Table 3.15-17. VMT Reductions For Pedestrian Improvements....3.15-27
Table 3.15-18. Project VMT Mitigation Results....3.15-28
Table 3.16-1. RDDMWD Projected Potable and Non-Potable Water Demands in Acre Feet (1)....3.16-4
Table 3.16-2. RDDMWD Projected Water Supply (Reasonably Available Volume in Acre Feet(1))3.16-4
Table 5-1. Summary of Alternatives and Project Objectives....5-25
Table 5-2. Comparison of Impacts of Proposed Project and Alternatives....5-26

Technical Appendices

Appendix A	NOP and NOP Comment Letters
Appendix B	Project Plans
Appendix C	Air Quality
Appendix D	Biological Resources Report
Appendix E	Arborist Letter
Appendix F	Cultural Resources Report
Appendix G1	Geotechnical Investigation
Appendix G2	Seismic Refraction Study
Appendix H	Greenhouse Gas Report
Appendix I	Phase I Environmental Site Assessment
Appendix J.1	Drainage Report
Appendix J.2	Stormwater Quality Management Plan
Appendix K	Transportation Study
Appendix L	Noise Report
Appendix M	Sewer Study
Appendix N	Fire Protection Plan

Acronyms

AB	Assembly Bill
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
ADT	Average Daily Trips
AF	Acre Feet
AFY	Acre Feet Per Year
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ALS	Advanced Life Support
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
AQIA	Air Quality Impact Assessment
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAU	Business-As-Usual
BCLA	Biological Core and Linkages Area
BMP	Best Management Practices
BEV	Battery Electric Vehicles
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Cal/OSHA	State of California Occupational Safety and Health Administration
CalRecycle	Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CC&R	Covenants, Conditions, and Restrictions
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
CERT	Community Emergency Response Team
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Community Facilities District
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CFS	Cubic Feet Per Second
CH_4	Methane

CHP	California Highway Patrol
CHHSL	California Human Health Screening Levels
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
CIWBM	California Integrated Waste Management Board
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	CO_2 Equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CUP	Conditional Use Permit
CWA	Clean Water Act
CWC	California Water Code
CWMP	Construction Waste Management Plan
CY	Cubic Yard
dB	Decibel
dBA	A-weighted Decibel
DBH	Diameter at Breast Height
DEH	Department of Environmental Health
DOT	Department of Transportation
DPF	Diesel Particulate Filter
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DU	Dwelling Unit
DU/Acre	Dwelling Unit/Acre
DWR	Department of Water Resources
E	East
EDI	Escondido Disposal Inc.
EFD	Escondido Fire Department
EI	Expansion Index
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EO	Executive Order
EMFAC	Emission Factor
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESA	Environmental Site Assessment
EUHSD	Escondido Union High School District
EUSD	Escondido Union School District
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FAR	Floor Area Ratio
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map

FT	Feet
FTA	Federal Transit Administration
FCEV	Fuel Cell Electric Vehicles
GHG	Greenhouse gas
GPA	General Plan Amendment
GPD	Gallons Per Day
GWP	Global Warming Potential
HA	Hydrologic Area
HAP	Hazardous Air Pollutants
HARRF	Hale Avenue Resource Recovery Facility
HCD	California Department of Housing and Community Development
HCM	Highway Capacity Manual
HFC	Hydrofluorocarbons
HMBP	Hazardous Material Business Plan
HMP	Hydromodification Plan
HPWQC	Highest Priority Water Quality Condition
HSS	Hydrologic Subarea
H&SC	Health and Safety Code
HU	Hydrologic Unit
HVAC	Heating, Ventilation, and Air Conditioning
IBC	International Building Code
ICC	International Code Council
ID	Improvement District
IEPR	Integrated Energy Policy Report
IFC	International Fire Code
IID	Imperial Irrigation District
In/Sec	inch per second
IPCC	Intergovernmental Panel on Climate Change
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
JRMP	Jurisdictional Runoff Management Program
Kg	Kilogram
kW	Kilowatt
kWh	Kilowatt-hour
LAFCO	Local Agency Formation Commission
LBP	Lead-based Paint
LCFS	Low Carbon Fuel Standards
Ldn	Day-Night Average Sound Level
LED	Light Emitting Diode
LEM	Laguna Mountain Environmental
Leq	Equivalent Sound Level
LID	Low Impact Development
LMA	Local Mobility Analysis
LNG	Liquefied Natural Gas
LOS	Level of Service
LTS	Less than Significant
LTSM	Less than Significant with Mitigation
MBTA	Migratory Bird Treaty Act
MG	Million Gallon
	MG/M^3 Milligrams per Cubic Meter

MGD	Million Gallons Per Day
MGRA	Master Geographic Reference Area
MGY	Million Gallons Per Year
MHCP	Multiple Habitat Conservation Plan
MM	Mitigation Measure
MMCFD	Million Cubic Feet Per Day
MMT	Million Metric Tons
$MMTCO_2e$	Million Metric Tons of CO_2 Equivalent
MOU	Memorandum of Understanding
MPH	Miles Per Hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	Metric Ton
MWD	Metropolitan Water District
MY	Model Year
N_2	Nitrogen
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NCTD	North County Transit District
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NETR	Nationwide Environmental Title Research
NEVs	Neighborhood Electric Vehicles
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO_2	Nitrogen Dioxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NREL	National Renewable Energy Laboratory
NRHP	National Register of Historic Places
O_2	Oxygen
O_3	Ozone
OEAP	Operational Area Emergency Plan
OEHHA	Office of Environmental Health Hazards Assessment
OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
OS	Open Space
PAMA	Pre-Approved Mitigation Area
PAU	Paramedic Assessment Unit
Pb	Lead
PC	Per Capita
PDF	Project Design Feature
PDP	Priority Development Project
PFC	Perfluorocarbons
PFF	Public Facility Fee
PG&E	Pacific Gas & Electric
PHEV	Plug-In Hybrid Electric Vehicles
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Respirable Particulate Matter

PPB	Parts Per Billion
PPHM	Parts Per Hundred Million
PPIC	Public Policy Institute of California
PPM	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRD	Planned Residential Development
PVC	Polyvinyl Chloride
RAQS	Regional Air Quality Strategies
RCP	Regional Comprehensive Plan
RCP	Reinforced Concrete Pipeline
RCRA	Resource Conservation and Recovery Act
RDDFPD	Rincon del Diablo Fire Protection District
RDDMWD	Rincon del Diablo Municipal Water District
REC	Recognized Environmental Conditions
REL	Reference Exposure Level
RES	Residential
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	Suburban
SAM	Site Assessment and Mitigation
SAFE	Safer Affordable Fuel-Efficient
SARA	Superfund Amendments and Reauthorization Act
SF_6	Sulfur Hexafluoride
SF	Square Feet
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SEJP	San Elijo Joint Powers Authority
SF_6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Area
SFNA	School Facilities Needs Assessment
SHMA	Seismic Hazards Mapping Act
SIP	State Implementation Plans
SLF	Sacred Lands File
SO_2	Sulfur Dioxide
SOI	Sphere of Influence
SOV	Single Occupancy Vehicle
SP	Service Population
SRA	State Responsibility Areas
SR-78	State Route 78

SU	Significant and Unavoidable
SUSMP	Standard Urban Stormwater Mitigation Plan
SWRCB	State Water Resources Control Board
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Stormwater Quality Management Plan
TACs	Toxic Air Contaminants
T-BACT	Toxics Best Available Control Technology
TCA	Traditionally and Culturally Affiliated
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TIAG	Transportation Impact Analysis Guidelines
TOVWTP	Twin Oaks Valley Water Treatment Plan
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
V/C	Volume-To-Capacity
Vdb	Vibration Velocity in Decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VR	Village Residential
VWD	Vallecitos Water District
WB	Westbound
WDR	Waste Discharge Requirements
WELO	Water Efficiency Landscape Ordinance
WMA	Watershed Management Area
WQIP	Water Quality Improvement Plan
ZEV	Zero Emission Vehicle
µg/m3	Micrograms Per Cubic Meter

0.0 Executive Summary

0.1 Project Summary

The applicant is proposing to develop 102 multi-family residential units and associated common and private open space on an approximate 7.7-acre site located at 2039, 2047, 2085 and 2089 North Iris Lane in the City of Escondido.

The project applicant is requesting the following discretionary approvals from the City to allow for development of the proposed project:

- Annexation/Reorganization from the County of San Diego into the City of Escondido
- General Plan Amendment from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre)
- Prezone/Rezone to Planned Development – No existing Zoning to Residential (PD-R 13.2) with a density of 13.2 units/acre
- Master and Precise Development Plan in accordance with Escondido Municipal Code, Chapter 33 – Zoning, Article 19. Planned Development (P-D Zone).
- Tentative Subdivision Map approval for the creation of one lot air-space units on the project site.

0.2 Summary of Significant Effects/Mitigation

Table ES-1, Summary of Significant Environmental Impacts, provides a summary of significant environmental impacts resulting from the project, mitigation measures identified to reduce and/or avoid the environmental effects, and a determination of the level of significance of each impact following implementation of the identified mitigation measures. The analysis shows that, with implementation of mitigation measures, all project impacts will be mitigated to below a level of significance. Detailed analyses of significant environmental effects and mitigation are provided in Chapter 3 of this Environmental Impact Report (EIR).

The mitigation measures listed in Table ES-1 will reduce impacts related to biological resources, cultural resources/tribal cultural resources, geology and soils, hazards and hazardous materials, noise, and transportation.

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
Biological Resources		
Impact BIO-1: Potential to impact avian species protected under the Migratory Bird Treaty Act if tree removal, vegetation removal, or other construction activities occur during the nesting season.	Implementation of MM-BIO-1, refer to Section 3.3.6	Less than significant

Impact	Mitigation Measures	Level of Significance After Mitigation
Impact BIO-2: The project will directly impact 0.1 acre of disturbed wetland and 2.5 acres of non-native grassland.	Implementation of MM-BIO-2, refer to Section 3.3.6	Less than significant
Impact BIO-3: Project development results in a direct impact to a total of 0.05 acre (494 linear feet) of U.S Army Corps of Engineers (USACE)/Regional Water Quality Control Board (RWQCB) jurisdiction (non-wetland water of the United States/water of the State) and to 0.12 acre of California Department of Fish and Wildlife (CDFW) jurisdictional areas consisting of 0.10 acre of disturbed wetland- and 0.02 acre of streambed. Impacts to a total of 0.05 acre of USACE/RWQCB jurisdiction occur within the CDFW jurisdictional limits.	Implementation of MM-BIO-3, refer to Section 3.3.6	Less than significant
Impact BIO-4: Project construction has the potential to impact 11 protected oak trees and 12 mature oak tree both on-site and off-site.	Implementation of MM-BIO-4, refer to Section 3.3.6	Less than significant
Impact BIO-5: Removal of trees on the project site has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species.	Implementation of MM-BIO-5, refer to Section 3.3.6	Less than significant
Cultural Resources and Tribal Cultural Resources		
Impact CR-1: Due to grading and ground disturbing activities, the project has the potential to impact unidentified	Implementation of MM-CR-1 through MM-CR-10, refer to Section 3.4.6	Less than significant

Impact	Mitigation Measures	Level of Significance After Mitigation
archeological resources on the project site.		
Impact CR-2: There is a potential for project construction activities to disturb previously unidentified human remains on the project site.	Implementation of MM-CR-8, refer to Section 3.4.6	Less than significant
Geology and Soils		
Impact GEO-1: Project grading may result in disturbance of previously unknown paleontological resource.	Implementation of MM-GEO-1, refer to Section 3.6.6	Less than significant
Hazards and Hazardous Materials		
Impact HAZ-1: Improper removal of asbestos-containing materials and lead-based paint during demolition could expose construction workers to a hazardous release of asbestos or lead.	Implementation of MM-HAZ-1a and MM-HAZ-1b, refer to Section 3.8.6	Less than significant
Impact HAZ-2: Undocumented fill material may contain contaminated materials.	Implementation of MM-HAZ-2, refer to Section 3.8.6	Less than significant
Noise		
Impact N-1: If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines.	Implementation of MM-N-1, refer to Section 3.11.6	Less than significant
Transportation		
Impact TR-1: The project's per capita VMT exceeds the significance threshold of 15% below regional average.	Implementation of MM-TR-1a, MM-TR-1b, refer to section 3.15.6	Less than significant

In addition to mitigation measures, project design features and regulatory compliance measures will also reduce or avoid adverse environmental effects. These project design features and regulatory compliance measures are summarized in Chapter 7 of the EIR.

0.3 Areas of Controversy

A Notice of Preparation (NOP), prepared in compliance with Section 15082 of the CEQA Guidelines, was distributed for the project on July 1, 2021. Six comment letters were received during the NOP period. The NOP and comments received during the 30-day NOP review period are included as Appendix A of this document. All comments received in response to the NOP are addressed in appropriate sections of this EIR. Topics raised in the NOP comment letters include:

- Biological Resources (sensitive bird species, tree removal/tree disease management, and CDFW jurisdictional impacts)
- Cultural Resources (tribal consultation requirements and mitigation measures)
- Land Use (proposed density, prefer single-family residential)
- Public Services and Safety (crime)
- Transportation (site access and circulation, increased traffic congestion on area roadways, speeding on area roadways, North Iris used for cut-through traffic, traffic count timing)

An online scoping meeting was held July 22, 2021 from 3:00 PM to 5:00 PM. The scoping meeting included presentation from City staff on the proposed project a time for question and answers from the public. Environmental and CEQA-related topics raised during the scoping meeting included:

- Biological Resources /Coast Live Oaks
- Cultural and Historical Resources
- Drainage/Stormwater
- Land Use (proposed density and land use compatibility)
- Noise
- Public Services (schools)
- Transportation (increase in traffic, driveway location with adjacent development)
- Utilities (existing SDG&E powerlines)
- Noticing of the project

These concerns are addressed in Chapters 3 and 4 of this EIR.

0.4 Issues to be Resolved

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

The lead agency must respond to each significant effect identified in the EIR by making “Findings” for each significant effect. The issues to be resolved by the decision makers for the project include whether or how to mitigate the associated significant effects, including whether to implement a project alternative.

Issues to be resolved that are directly related to the proposed project include the choice among the alternatives and whether or how to mitigate the significant effects. In particular, the decision makers must decide if the significant impacts associated with biological resources, cultural resources/tribal cultural resources, geology and soils, hazards and hazardous materials, noise, and transportation have been mitigated to less than significant. Lastly, the decision makers must determine whether any of the project alternatives would substantially reduce significant effects while still meeting key objectives of the project.

0.5 Project Alternatives

Four alternatives are proposed to provide an understanding of how environmental effects could be reduced by varying the design and scope of the project. **Table ES-2** provides a comparison of the impacts of project alternatives to the impacts of the proposed project.

0.5.1 No Project/No Development Alternative

Under the No Project/No Development Alternative, the proposed project would not be implemented, and the project site would remain in its current condition. No grading or construction would occur on the project site under this alternative. The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. The southern portion of the project site is currently used as a horse pasture. Current access to the project site is via two private driveways on North Iris Lane and one private driveway on Robin Hill Lane. Existing vegetation communities on the project site include urban/developed, non-native grassland, disturbed habitat, and non-native vegetation. There is a small area (0.1 acre) of disturbed wetlands associated with a drainage that runs west-east in the southcentral portion of the project site.

Because the No Project/No Development Alternative would not develop any additional homes on the project site, overall impacts would be less than with the proposed project or eliminated entirely. There are some benefits of the project that would not be realized under this alternative, including stormwater infrastructure, provision of a net 98 residential units which contribute towards the City's RHNA allocation, recreational amenities, roadway and pedestrian improvements, and undergrounding of SDG&E power poles. Under this alternative there would not be any payment of public facility fees for residential development which goes toward supporting variety of services and improvements in the City. Additionally, fee payment to improve pedestrian safety at five intersections and fair share fee payments towards the future widening of a segment of North Iris Lane would not be realized under this alternative. Finally, this alternative would not meet any of the project objectives.

0.5.2 No Project/Existing Escondido General Plan Land Use Designation Alternative

Under the No Project/Existing Escondido General Plan Land Use Alternative, the project site would be annexed into the City of Escondido and developed consistent with the existing Escondido General Plan Designation of Suburban (S). The Suburban (S) designation allows up to 3.3 dwelling units per acre and has a zoning requirement of R-1-10 or higher. Therefore, this alternative assumes up to 23 single-family units would be developed on the approximately 6.98-acre (net) site. Under this alternative the project would annex into the city and the existing on-site septic would be abandoned and removed during demolition. Future development would be served by the city for sewer service. It is assumed the entire site would be developed under this alternative, including demolition of the four existing structures on site to provide for a more orderly development of 23 single-family units. This alternative assumes that the same infrastructure improvements would be provided including stormwater infrastructure, roadway and pedestrian improvements, and undergrounding of SDG&E power poles.

Vehicular trips under the No Project/Existing Escondido General Plan Land Use Alternative would be reduced by approximately 72% compared to the proposed project. This alternative would generate approximately 230 ADT (23 units X 10 ADT per unit) compared to the 816 ADT anticipated for the project.

The No Project/Existing Escondido General Plan Land Use Alternative would result in a less intensive use on the project site with 79 fewer residential units than the proposed project and 72% fewer ADT (230 ADT compared to 816 ADT). This results in a corresponding proportional decrease in air and greenhouse gas emissions and noise from vehicles compared to the proposed project. Footprint-specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be similar as the proposed project as the same amount of site area would be disturbed. This alternative would generate fewer students for EUSD and EUHSD and would reduce demand for public services (fire, police, recreation, libraries) and utilities (solid waste, water and sewer service) compared to the proposed project. The No Project/Existing Escondido General Plan Land Use Alternative would still have a significant VMT impact and mitigation would be required to reduce impact to below a level of significance. The No Project/Existing Escondido General Plan Land Use Alternative could meet two of the project objectives but fails to meet three of the objectives,

0.5.3 No Project/Existing San Diego County General Plan Land Use Designation Alternative

Under the No Project/Existing San Diego County General Plan Land Use Designation Alternative, the site would not annex into the City and would be developed in accordance with the County's General Plan designation on the site. The site is designated as Village Residential (VR-24) in the County's General Plan, which allows for up to 24 dwelling units per acre. This means the 6.98-acre (net) site could be developed with up to 167 units. Vehicular trips under the No Project/Existing San Diego County General Plan Designation Alternative would generate 1,002 ADT (167 X 6 ADT). This is an increase of 186 ADT compared to the prosed project (816 ADT). This represents a 23% increase in trip generation. Development on the site while remaining in the County would require an out-of-jurisdiction service agreement with the City of Escondido for sewer. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted because the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. However, in the past the City has not provided out-of-jurisdiction service agreements absent a health emergency and approval by the Local Agency Formation Commission (LAFCO).

The No Project/Existing San Diego County General Plan Land Use Alternative would result in higher density on the project site, resulting in 65 more residential units and 23% more trip generation compared to the proposed project (1,002 ADT compared to 816 ADT). This results in a corresponding proportional increase in air and greenhouse gas emissions and noise from vehicles compared to the proposed project. Footprint-specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be similar as the proposed project as the same amount of site area would be disturbed. This alternative would generate more students for EUSD and EUHSD and would increase demand for public services (fire, police, recreation, libraries) and utilities (solid waste, water and sewer service) compared to the proposed project. This alternative would result in a significant and unmitigated impact related to VMT. As shown in Table 5-1, this alternative would meet all but one of the project objectives: annexation into the City of Escondido. As discussed above, development on the site while remaining in the County may be infeasible. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted because the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. Development on the site while remaining in the County would require an

out-of-jurisdiction service agreement with the City of Escondido for sewer. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted because the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. However, in the past the City has not provided out-of-jurisdiction service agreements absent a health emergency and approval by LAFCO.

0.5.4 Reduced Footprint Alternative

The Reduced Footprint Alternative was developed to avoid impacts to the wetland and channelized drainage area on the project site and would also incorporate a 50-foot buffer from the wetlands. This would reduce impacts to biological resources/jurisdictional resources. Development would be focused in the northern and north-central portion of the project site. This alternative would construct approximately 82 multifamily units. Annexation into the City would be required for this alternative. Vehicular trips under this alternative would be reduced compared to the proposed project. This alternative would generate 656 ADT. Compared to the proposed project, which generates 816 ADT, this alternative would reduce ADT by approximately 20%.

The Reduced Footprint Alternative would reduce the number of residential units constructed on the project site by 20 units. This results in a corresponding decrease in vehicular trips by approximately 20% and a corresponding decrease in air and greenhouse gas emissions and noise from offsite traffic compared to the proposed project. Public services, utilities and service systems, and energy demands would also proportionally decrease. Footprint specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be less than the proposed project because less ground disturbing activity would be required. This alternative would also avoid impacts to wetland habitat and to jurisdictional wetlands and non-wetland waters. The amount of public facilities fees paid for residential development would be less than compared to the project since fewer residential uses would be constructed. VMT-related transportation impacts would be significant and mitigation would be required to reduce the impact to below a level of significance. Similarly, the amount of school fees paid would be less under this alternative. Fee payment for improvements of pedestrian facilities at offsite intersections would still be required and a fair share payment towards the widening of a segment of North Iris Lane would still occur under this alternative.

0.6 Environmentally Superior Alternative

Table ES-2 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. As shown in Table ES-2, the No Project/No Development Alternative would eliminate all of the significant impacts identified for the project. However, the No Project/No Development Alternative would not meet any of the project objectives. CEQA Guidelines Section 15126.6(e)(2) states that if the No Project alternative is identified as the environmentally superior alternative, then an environmentally superior alternative should be identified among the other alternatives.

Among the other alternatives, not including the proposed project, the Reduced Footprint Alternative is the environmentally superior alternative because it would provide a reduced level of impact in some environmental analysis areas including air quality, greenhouse gas, noise, public services, recreation, and utilities/service systems. Additionally, footprint specific impacts, such as those related to cultural and tribal resources, biological resources, and geology and soils would be reduced compared to the proposed project, because less ground disturbing activities would be required. The Reduced Footprint Alternative would avoid the impacts to wetlands habitat and the jurisdictional wetlands and non—wetlands waters. Mitigation measures would still be required to mitigate impacts to biological resources, cultural resources, geology and soils hazards/hazardous materials, and transportation.

Table ES-2. Comparison of Impacts of Proposed Project and Alternatives

Environmental Topic	Proposed Project (102 Units)	No Project/No Development Alternative	No Project/Existing Escondido General Plan Land Use Designation Alternative (23 Units)	No Project/Existing San Diego County General Plan Land Use Designation Alternative (167 Units)	Reduced Footprint Alternative (82 Units)
Aesthetics	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Same)
Air Quality	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Biological Resources	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Reduced)
Cultural/Tribal Resources	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Reduced)
Energy	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Geology and Soils	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Same)
Greenhouse Gas Emissions	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Hazards and Hazardous Materials	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Same)
Hydrology and Water Quality	LTS	No Impact (Reduced)	LTS (Same)	LTS (Same)	LTS (Same)
Land Use and Planning	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Same)	LTS (Same)
Noise	LTSM	No Impact (Reduced)	LTSM (Reduced)	LTSM (Increased)	LTSM (Reduced)

Environmental Topic	Proposed Project (102 Units)	No Project/No Development Alternative	No Project/Existing Escondido General Plan Land Use Designation Alternative (23 Units)	No Project/Existing San Diego County General Plan Land Use Designation Alternative (167 Units)	Reduced Footprint Alternative (82 Units)
Population and Housing	LTS	No Impact (Reduced)	LTS (Same)	LTS (Same)	LTS (Same)
Public Services	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Recreation	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Transportation	LTSM	No Impact (Reduced)	LTSM (Reduced)	SU (Increased)	LTSM (Same)
Utilities and Service Systems	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)

Notes: Impact Status: LTS = Less than significant impact; LTSM = Less than significant with mitigation; SU = Significant and unavoidable

1.0 Introduction

This section provides an introduction to the Environmental Impact Report (EIR), including the intended use and purpose of the EIR, the scope of the EIR, a description of the Lead, Responsible and Trustee Agencies, and a summary of the environmental review process.

1.1 Intended Use and Purpose of the EIR

This Environmental Impact Report (EIR) has been prepared by the City of Escondido (City) for the North Iris Residential Project to satisfy the requirements of the California Environmental Quality Act (CEQA) (California Code of Regulations, Section 15000, et seq.). Pursuant to CEQA, this EIR assesses the environmental effects of the proposed project, identifies feasible mitigation measures as appropriate, and evaluates a reasonable range of alternatives to reduce significant environmental impacts. This document is intended to disclose the environmental consequences of the project decision makers as well as other agencies with discretionary authority. As this EIR is intended to cover a single development project, a project-level EIR was prepared. This EIR complies with all criteria, standards, and procedures of CEQA (1970), as amended (Public Resources Code [PRC] 21000 et seq.), and CEQA Guidelines (California Administrative Code 15000 et seq.).

1.2 Scope of the EIR

A Notice of Preparation (NOP), prepared in compliance with Section 15082 of the CEQA Guidelines, was distributed for the project on July 1, 2021. Six comment letters were received during the NOP period. The NOP and comments received during the 30-day NOP review period are included as **Appendix A** of this document. All comments received in response to the NOP are addressed in appropriate sections of this EIR. Topics raised in the NOP comment letters include:

- Biological Resources (sensitive bird species, tree removal/tree disease management, and CDFW jurisdictional impacts)
- Cultural Resources (tribal consultation requirements and mitigation measures)
- Land Use (proposed density, prefer single-family residential)
- Public Services and Safety (crime)
- Transportation (site access and circulation, increased traffic congestion on area roadways, speeding on area roadways, North Iris used for cut-through traffic, traffic count timing)

An online scoping meeting was held July 22, 2021, from 3:00 PM to 5:00 PM. The scoping meeting included presentation from City staff on the proposed project a time for question and answers from the public. Environmental and CEQA-related topics raised during the scoping meeting included:

- Biological Resources /Coast Live Oaks
- Cultural and Historical Resources
- Drainage/Stormwater
- Land Use (proposed density and land use compatibility)
- Noise

- Public Services (schools)
- Transportation (increase in traffic, driveway location with adjacent development)
- Utilities (existing SDG&E powerlines)
- Noticing of the project

1.3 Lead, Responsible and Trustee Agencies

In accordance with Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the CEQA Guidelines, the City of Escondido is the Lead Agency for this project because it would be constructed within the jurisdiction of the City. As the decision makers for the Lead Agency, the City Council will consider the information included in the EIR along with any other relevant information included in the public record to make their decision on the proposed project.

In addition to the Lead Agency, Responsible Agencies or Trustee Agencies may be involved in the CEQA process. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. For the proposed project, the California Department of Fish and Wildlife (CDFW) is a Trustee Agency

Per Section 15381 of the CEQA Guidelines, the term Responsible Agency includes all public agencies other than the Lead Agency with discretionary approval power over the project. Responsible Agencies that have an interest in the project include the San Diego Local Agency Formation Commission, U.S. Army Corps of Engineers, CDFW, and San Diego Regional Water Quality Control Board. State law requires that all EIRs be reviewed by Trustee and Responsible Agencies.

1.4 Environmental Review Process

The City of Escondido, as Lead Agency, is responsible for preparation of this EIR. The preparation process involves two stages; the Draft EIR and the Final EIR. As described further below, the Draft EIR will be circulated for public review and comment for 45 days. The public review comments will be incorporated and addressed in the Final EIR, which is the final document that the City Council will review to decide whether to approve or deny the proposed project.

1.4.1 Draft EIR

The Draft EIR is distributed for review to the Responsible Agencies and Trustee Agencies with resources affected by the project, state agencies, federal agencies, and interested parties and individuals. The Draft EIR review period is typically 45 days. The purpose of the review period is to obtain comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated" (CEQA Guidelines Section 15204). In accordance with CEQA Guidelines Sections 15085 and 15087(a)(1), upon completion of the Draft EIR, a Notice of Completion is filed with the State Office of Planning and Research, and a Notice of Availability of the Draft EIR is issued in a newspaper of general circulation in the area.

The Draft EIR and all related technical studies are available online for review during the public review period at: https://www.escondido.org/north-iris-condominiums, at City Hall (see address below), and at the Escondido Public Library at 239 S. Kalmia Street, Escondido, CA 92025.

Comment letters on the Draft EIR may be submitted in writing and addressed to:

Jay Paul, Senior Planner
City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025
E-mail: jpaul@escondido.org
Phone: 760-839-4537

1.4.2 Final EIR

The City of Escondido will provide written responses to comments regarding the adequacy of the Draft EIR per CEQA Guidelines Section 15088 and will consider all comments in making its decision whether to certify the Final EIR. While not included in the Final EIR, a Mitigation Monitoring and Reporting Program; and Findings of Fact will be prepared as part of the EIR process, as appropriate. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA.

1.5 Document Organizations

The EIR includes two volumes; Volume I includes Chapters 1.0 to Chapter 8.0, and Volume II includes the technical appendices.

1.5.1 Volume I

The following is a description of each chapter of Volume I:

Executive Summary: Provides a summary of the project, environmental impacts, mitigation measures, significance of impacts after mitigation, and project alternatives.

Chapter 1 – Introduction: Describes the purpose and intended use of the EIR, scope of the EIR, environmental review process, and organizational format of the EIR.

Chapter 2 – Project Description: Includes a detailed description of the project components, project objectives, and discretionary actions, as well as a basic description of the project location, environmental setting, and site history.

Chapter 3 – Environmental Analysis: Provides a discussion of each environmental topic to be addressed in detail in the EIR, including existing conditions; regulatory framework; thresholds of significance; assessment of potential direct, indirect, and cumulative environmental impacts; significance of impacts; and a recommendation of reasonable and feasible mitigation measures, if necessary.

Chapter 4 – Other CEQA Considerations: Covers effects found not to be significant, significant and unavoidable effects, significant irreversible changes, and growth-inducing impacts.

Chapter 5 – Alternatives: Addresses alternatives to the proposed project.

Chapter 6 – References: Includes a list of reference documents and other sources of information.

Chapter 7 –Mitigation Measures, Project Design Features and Compliance Measures: Provides a list of the mitigation measures, project design features and compliance measures that reduce environmental impacts of the project.

Chapter 8 – Preparers: Provides a list of City staff and consultants involved in preparation of the EIR

1.5.2 Volume II

The following technical and supporting materials discussed and cited in the text are either bound separately or included as electronic files in the Appendices.

- Appendix A NOP and NOP Comment Letters
- Appendix B Project Plans
- Appendix C Air Quality Report
- Appendix D Biological Resources Report
- Appendix E Arborist Letter
- Appendix F Cultural Resources Report
- Appendix G1 Geotechnical Investigation
- Appendix G2 Seismic Refraction Study
- Appendix H Greenhouse Gas Report
- Appendix I Phase I Environmental Site Assessment
- Appendix J1 Drainage Report
- Appendix J2 Stormwater Quality Management Plan
- Appendix K Transportation Study
- Appendix L Noise Report
- Appendix M Sewer Study
- Appendix N Fire Protection Plan

2.0 Project Description

2.1 Introduction

The following section provides detailed information on the North Iris Residential Project (proposed project) which proposes development of a 102-unit multi-family residential development. For purposes of the California Environmental Quality Act (CEQA), a complete project description must contain the following information: (a) the precise location and boundaries of the proposed project, shown on a detailed map, along with a regional map of the project's location (refer to Section 2.2), (b) a statement of the objectives sought by the proposed project that should include the underlying purpose of the project (refer to Section 2.4); (c) a general description of the project's technical, economic, and environmental characteristics (refer to Section 2.5"); and (d) a statement briefly describing the intended uses of the EIR (refer to Section 1.1).

2.2 Project Location and Environmental Setting

The 7.7-acre project site is located in the west-central portion of San Diego County in the northern portion of the City of Escondido at the southwest corner of North Iris Lane and Robin Hill Lane (**Figures 2-1 and 2-2**). The project is comprised of five parcels (APNs 224-310-05, -06, -07, -08 and -20) and is associated with the following addresses 2039, 2047, 2085 and 2089 North Iris Lane.

The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24 dwelling units/acre (du/acre). In the City's General Plan, this site is identified as Suburban which allows for up to 3.3. du/acre. There is no City Zoning designation identified for the project site.

The project site is bounded by Robin Hill Lane on the north with attached single family residential uses north of Robin Hill Lane that are in the City's jurisdiction and are zoned Planned Development – Residential (PDR) with an Urban 1 land use. To the west, the site is bounded by Robin Hill Lane and parcels within the County's jurisdiction that are developed with single family residences. Those parcels have a General Plan Designation of Village Residential VR-24 and are zoned RS – Single Family. To the south, the site is bounded by single family residences in the City that are zoned R-1. To the east, the site is bounded by North Iris Lane with the three-story Meadowbrook Village care facility (a mix of semi-independent and congregate care units) zoned R-1. To the south and southeast of the project site is single family residential zoned R-1 in the City.

The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. The southern portion of the project site is currently used as a horse pasture. Current access to the project site is via two private driveways on North Iris Lane and one private driveway on Robin Hill Lane. Existing vegetation communities on the project site include urban/developed, non-native grassland, disturbed habitat, and non-native vegetation (Helix 2022). There is a small area (0.1 acre) of disturbed wetlands associated with a drainage that runs west-east in the south-central portion of the project site. Soils on the project site are Escondido very fine sandy loam (5-9% slopes), Escondido very fine sandy loam (9-15% slopes, eroded) and Placentia sandy loam. Elevations on the project site range from 710 to 740 feet AMSL (**Figure 2-3**).

2.3 Project Site History

A review of historical aerial photographs provides a history of the project site. The site was vacant until the early 1950s when some development started on the northeastern portion of the project site. A 1964 historic aerial photograph shows that five structures had been developed on the site with four dirt roads connecting the structures. Based upon historical research by Laguna Mountain Environmental (LME) the residence at 2085 North Iris was constructed in 1951 and the remaining three were constructed in 1961 (LME 2021). A review of subsequent aerial photographs from various years (1967 – 2016) did not reveal any significant changes in conditions on the project site.

2.4 Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines requires an EIR to include a statement of objectives for the proposed project. The objectives outline the underlying purpose of the project and assist in the development of project alternatives. The following project objectives have been identified for the proposed project:

- Develop a workforce housing community by providing a range of unit types, sizes, and bedroom numbers thereby accommodating a range of affordability for a full spectrum of family demographics to contribute to the growing housing needs of the region.
- To the extent possible given the site constraints, provide housing to Escondido using the Urban III land use classification which provides for up to 18 units per acre.
- Create high-quality recreational open space opportunities for the residents of all ages to enjoy thereby fostering a healthy community environment.
- Design a multi-family community with private open space areas for units where families can gather and enjoy healthy indoor-outdoor living.
- Annex the project to the City of Escondido which provides quality infrastructure, public services, and facilities necessary to serve the development.

2.5 Project Components

2.5.1 Residential

The project proposes 102 multi-family residential units situated on 7.7 acres. This includes 14 two-bedroom units, 30 three-bedroom units and 58 four-bedroom units. The private and gated residential land uses comprise approximately 2.4-acres of the project site. The conceptual site plan is presented in **Figure 2-4**.

One- two- and three-story product types are included with the project. The project proposes ten 4-Plex buildings (40 units), four 5-plex buildings (20 units), and seven 6-plex buildings (42 units) for a total of 102 units. The product type includes interlocking alley homes and conventional homes. The 52 interlocking alley homes would have two to four bedrooms, private decks or patios, and range from 1,228 to 1,840 square feet (s.f.). The 50 conventional homes would have three for four bedrooms, private rear yards, and range from 1,679 to 1,911 s.f. **Figures 2-5 through 2-10** present the architectural concepts for each product type.

The project would have a Traditional Farmhouse architectural style. Proposed materials include wood, stucco, siding with decorative trims. The project includes a variety of floor plans to allow for the articulation of the building elevations. Overall building heights would not exceed 37 feet.

2.5.2 Open Space and Recreation

Open space within the project would total 97,040 s.f. (approximately 2.22 acres) and includes a mix of common open space and private open space. **Table 2-1** summarizes the proposed open space areas. The open space areas are shown in **Figure 2-11**.

Table 2-1. Proposed Open Space

Open Space Type	Amount Provided (s.f.)
Common Open Space Area (Grades less than 10%)	64,247 s.f.
Recreational Areas	11,359 s.f.
Private Open Space (Patios and Decks)	21,434 s.f.
Total Open Space	**97,040 s.f.**

Common Open Space

Common open space area with grades less than 10 percent includes usable open space areas which encourage relaxation activities such as observing nature, bird watching, painting, photography, and picnicking as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The water quality basins would be used to direct water during rain events to control for flooding and to treat water before it is discharged from the site. These areas total 64,247 s.f. and would be maintained by the Homeowners Association.

The proposed project also includes recreational areas totaling 11,359 s.f. This includes a tot lot and barbeque area in the northeast portion of the site and an outdoor workout areas in the northwest portion of the site. There would also be dispersed seating and patio areas throughout the site. These areas would be maintained by the Homeowners Association.

Private Open Space

Private open space within the project area consists of private yard, private patio space and/or private balcony/deck space. The project would provide a total of 21,434 s.f. of outdoor private space. These areas are shown in pink on Figure 2-11.

2.5.3 Fencing, Walls and Lighting

Walls and Fences

Walls and fences within the proposed project are functional boundaries framing outdoor spaces and complementary pieces of the landscape design. Walls and fences create partitions between private

open space, screen the development from roadways, reduce noise from roadways, and enhance the overall site design.

The project proposes a combination of fencing, decorative walls and retaining walls along the project perimeter. Retaining walls are also proposed in a few area of the project interior. The conceptual fencing and wall plan is presented in **Figure 2-12**.

Along the frontage of North Iris Lane would be a 6-foot freestanding masonry wall with the exception of the entry frontage, which would be tubular steel. Retaining walls would be used in several areas of the project site, including along a portion of the western, southern and eastern boundaries and also in the northwest corner of the project site. On the project's northern boundary on Robin Hill Lane would be a mix of 6-foot freestanding masonry wall (east of the project's main entrance, and 6-foot steel tubing fence west of the project's main entry. Vehicular and pedestrian gates are proposed at the project's primary entrance and the secondary exit-only driveway.

Lighting

Nighttime exterior lighting would be provided on the residential development site for safety, security, and circulation purposes. Different exterior lighting fixtures would be used, including pole-mounted streetlights and wall-mounted residential lights. Consistent with Article 35 of the City's Zoning Ordinance, all exterior lighting fixtures, with the exception of streetlamps, would be aimed or shielded so that unnecessary nighttime lighting and glare are reduced for the benefit of the citizens of the city and astronomical research at Palomar Mountain Observatory. Additionally, in accordance with Zoning Ordinance Section 33-713(d), street lighting installed on the private streets would comply with the City's Engineering Design Standards and Standard Drawings.

2.5.4 Access, Circulation and Parking

Access

Access to the project site would be via one 36-foot wide driveway on Robin Hill Lane which would provide a private gated circular bulb turnaround entry with access to ingress and egress. A 24-foot wide gated secondary exit-only driveway would be provided at the eastern boundary of the project site to connect with North Iris Lane.

Circulation

Circulation through the project site would be via private driveways and alleys to access the residential units. In addition, the project provides an accessible path of travel through the site and to each residence via pedestrian pathways. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles.

Parking

The project proposes a total of 231 parking spaces. This includes 204 garage spaces associated with the units, which would be pre-wired for electric vehicle (EV) charging stations. An additional 27 guest spaces are included in the project design and include 22 open guest spaces, 2 Americans with Disability Act (ADA) guest spaces and 3 EV spaces.

2.5.5 Roadway Improvements

The project would make roadway and pedestrian improvements on North Iris Lane and Robin Hill Lane. Currently, along the project frontage, North Iris Lane has a 47-foot right-of-way, one travel lane in each direction and a sidewalk on the eastern side of the road. The proposed project would provide a 15-foot right-of-way dedication along the project frontage with North Iris Lane to create a 62-foot right of way, which would allow for wider travel lanes and a 4-foot sidewalk along the project frontage. The applicant would install approximately 850 feet of sidewalk along the project frontage with North Iris Lane. This would complete a missing section of sidewalk along North Iris Lane and improve pedestrian network connectivity for the neighborhood.

Robin Hill Lane is currently a private roadway that is 20-feet wide with no sidewalk. Under the proposed project, the project would provide an additional 24-foot easement to the existing 20 foot easement, which will include two 16-foot travel lanes, a 4-foot sidewalk, and a parkway. The project would install approximately 440 feet of sidewalk on Robin Hill Lane.

2.5.6 Site Drainage

The project proposes to use combination facilities to provide treatment of site runoff, hydromodification mitigation and peak flow attenuation. Site runoff would be directed to three stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. Basin 1 would be 3,180 square feet (s.f.), Basin 2 would be 4,580 s.f. and Basin 3 would be 2,000 s.f. These basins would serve as both retention and biofiltration features. These water quality basins would be maintained by the Homeowners Association.

2.5.7 Utilities and Public Services

Water Service

The four residences on the project site are currently served by Rincon del Diablo Municipal Water District (RDDMWD) for water service. RDDMWD would provide water service to the proposed development on the project site. The project will abandon the existing 12-inch water line on Robin Hill Lane and install a new 12-inch main line looping system with a secondary tie on Robin Hill Lane.

Sewer Service

Currently one existing residence on the project site, 2089 North Iris Lane, is served by the City for sewer service. The other three residents have onsite septic. The onsite septic would be abandoned and removed during project demolition and all the future development would be entirely served by the City for sewer service. The project would connect to the existing 10-inch sewer line in North Iris Lane. No upsizing of sewer lines is required to serve the project.

In order to be serviced by the City for sewer service, the project site would need to annex into the City. Annexation into the City and the City's sewer service boundary is one of the discretionary actions proposed for the project and requires City and LAFCO approval.

Vallecitos Water District Easement

The Vallecitos Water District (VWD) has a 20-foot wide pipeline easement directly adjacent to the southern boundary of the project site. The easement is for a water pipeline that conveys water from the San Diego Aqueduct to the VWD service area. The easement was recorded April 1, 1958 (Book

7018, page 508) and noted to be in favor of the San Marcos County Water District. The San Marcos County Water District later changed its name to the Vallecitos Water District. The Final Map for Escondido Tract No. 559, which covers the residential development south of the project site, including the homes on Cheyenne Lane, maps this easement as falling completely within the residential lots. The backyards and private fences of these adjacent residences fall within the easement area.

Electricity Service

Electricity and natural gas service is currently provided to the project site by San Diego Gas & Electric (SDG&E). SDG&E would serve the proposed development for electric service. The project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project would underground five existing SDG&E power poles along North Iris Lane. Four of the poles are along the project frontage and one pole is located approximately 60 feet north of the project site on North Iris Lane. The project applicant would coordinate with SDG&E for the undergrounding of these poles. If the project utilizes natural gas, it would connect to the existing gas line within North Iris Lane.

Solid Waste Service

Solid waste service to the project site is currently provided by EDCO. Under the proposed project, the site would continue to be served be EDCO.

Fire Protection

The proposed project would be served by the Escondido Fire Department. The closest fire station to the project site is Escondido Station No. 3 located at 1808 North Nutmeg Street, approximately 0.75 mile southwest of the project site.

Police Protection

Police protection services for the project site would be provided by the Escondido Police Department. The police station is at the Police and Fire Headquarters at 1162 North Centre City Parkway, approximately 1.4 miles south of the project site.

Schools

The project site is within the service boundaries of Escondido Union School District (TK-8th grade) and Escondido Union High School District (grades 9-12). The project site is within the attendance boundary of the following schools:

- North Broadway Elementary School, 2301 North Broadway, Escondido
- Rincon Middle School, 925 Lehner Avenue, Escondido
- Escondido High School, 1535 North Broadway, Escondido

2.5.8 Landscaping

The proposed landscape plan includes a mix of trees, shrubs, grasses and groundcover. The landscape concept plan is presented in **Figures 2-13 through 2-16**. The intent of the landscape plan is to provide plant material that accent and frame the architecture and enhances the pedestrian scale of the project. The project would plant approximately 171 trees internal to the project plus additional street trees along the project frontages with North Iris Lane and Robin Hill Lane.

Proposed tree species include desert willow, Indian hawthorn, California laurel, Carolina cherry, fern pine, western redbud, European olive, Mexican palo verde, African sumac, strawberry tree, flaxleaf paperbark, coast live oak, queen palm and Mexican fan palm. The proposed street tree species, golden rain tree, is consistent with surrounding areas and would provide continuity throughout the adjacent community. The planting palette focuses on low water use plants and the irrigation system would be designed in compliance with the City's Water Efficient Landscape Ordinance (WELO).

2.5.9 Demolition, Grading and Construction

Demolition

The project would be developed in one phase. To prepare the site for development, the existing residential structures and associated buildings on the site would be demolished and removed. The demolition phase is anticipated to take two weeks and would generate approximately 15 truckloads of debris that would be removed from the site. A Construction Waste Management Plan would be developed for the project and a minimum of 65 percent of the non-hazardous construction and demolition debris shall be diverted from the landfill through recycling.

Grading, Blasting and Rock Crushing

After removal of the existing structures, the entire project site would be graded to prepare the site for infrastructure and building pads. Grading activities are expected to take three to four months. Grading activities would include 17,700 cubic yards (c.y.) of cut and 39,800 c.y. of fill, with a net import of 22,100 c.y. The maximum cut depth would be 15 feet in the northwestern portion of the site and the maximum fill depth would be 10 feet in the west central portion of the site. Soils import is expected to take three weeks. Assuming a 15 c.y. haul truck, this equates to approximately 100 trucks per day.

Blasting may be required in certain areas during construction due to the presence of granitic bedrock. Although the precise amount of blasting required is unknown at this time, if all granitic areas needed blasting, up to 6,812 c.y. of material would be subject to blasting. If blasting is required, verification of a San Diego County Explosives Permit and a copy of the blaster's public liability insurance policy must be filed with the Fire Chief and the City Engineer prior to the commencement of any blasting activities. This would be made a condition of approval for the project.

Following blasting, rock crushing of blasted materials would be needed. No rock crushing would occur on the site. Blasted materials would be transported to the Rosemary's Mountain Quarry in Fallbrook, approximately 15 miles north of the project site. The export of blasted materials is expected to take one week. Assuming a 15 c.y. haul truck, this equates to approximately 91 trucks per day.

Site improvements and building construction would take another 18 months once grading activities are complete.

2.6 Discretionary Actions

Approval of the proposed project would require a number of discretionary actions. According to Sections 15050 and 15367 of the State CEQA Guidelines, the City of Escondido is designated as the Lead Agency for the project. Responsible agencies include all public agencies other than the Lead Agency which have discretionary approval power over the project. The Responsible Agencies for the project include LAFCO, the U.S. Army Corps of Engineers and San Diego Regional Water Quality Control Board. Trustee Agencies are state agencies with jurisdiction by law over natural resources affected by

a proposed project that are held in trust of the people of the State of California. The California Department of Fish and Wildlife is a Trustee Agency for the proposed project. The following list indicates the various discretionary actions that would be required to implement the proposed project and the agencies that would grant discretionary approval for these actions.

City of Escondido (Lead Agency)

- Annexation/Reorganization from the County of San Diego into the City of Escondido
- General Plan Amendment from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre)
- Prezone/Rezone to Planned Development – No Zoning designation to Residential (PD-R 13.2) with a density of 13.2 units/acre
- Master and Precise Development Plan in accordance with Escondido Municipal Code, Chapter 33 – Zoning, Article 19. Planned Development (P-D Zone).
- Tentative Subdivision Map approval for the creation of one lot air-space units on the project site.

San Diego Local Agency Formation Commission (Responsible Agency)

- Approval of the Annexation/Reorganization into the City of Escondido
- Approval of the sewer annexation into the City's Sewer District

California Department of Fish and Wildlife (Trustee Agency)

- California Fish and Game Code Section 1602 Streambed Alteration Agreement for potential impacts on streambed.

U.S. Army Corps of Engineers (Responsible Agency)

- Clean Water Act Nationwide 39 Section 404 Permit for potential impacts on waters of the United States.

San Diego Regional Water Quality Control Board (Responsible Agency)

- National Pollutant Discharge Elimination System Construction Activities Storm Water General Permit for construction.
- Clean Water Act Section 401 Water Quality Certification for potential impacts on waters of the United States.

2.7 List of Past, Present and Reasonably Anticipated Future Projects in the Project Area

CEQA requires an EIR to analyze cumulative impacts. Section 15355 of CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. The discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone," but instead is to be "be guided by standards of practicality and

reasonableness" (CEQA Guidelines §15130(b)). The discussion should also focus only on significant effects resulting from the project's incremental effects and the effects of other projects. According to Section 15130(a)(1), "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

Cumulative impacts can result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review.

- According to Section 15130(b)(1) of the CEQA Guidelines, a cumulative impact analysis may be conducted and presented by either of two methods:
- A list of past, present, and probable activities producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

With the exception of the impact analyses of air quality and greenhouse gas emissions, the cumulative list approach has been used in this cumulative analysis, as discussed below. The cumulative impacts of air quality and greenhouse gas emissions have been evaluated using the summary of projections method because the geographic scope of such impacts tends to be broad and area-wide. An inventory of past, present, and reasonably foreseeable future projects within the vicinity of the project site is presented in **Table 2-2** and shown on **Figure 2-17**.

Table 2-2. Cumulative Projects

No.(1)	Project	Location	Description
1	Escondido Country Club – The Villages	North of El Norte Parkway, west of I-15, along both sides of Country Club Lane	A mixed-use project with 392 single family homes, recreational amenities, and an urban farm.
2	Nutmeg Residences	Southwest corner of Centre City Parkway and Nutmeg Street	134 townhomes/villas and 97 single family homes
3	Assisted Living Residences	East side of Centre City Parkway, south of Iris Lane	96 bed residential care facility

Note: (1) See Figure 2-17 for location of cumulative projects.

Figure 2-1. Regional Map

Figure 2-2. Project Vicinity

Figure 2-3. Topographic Map

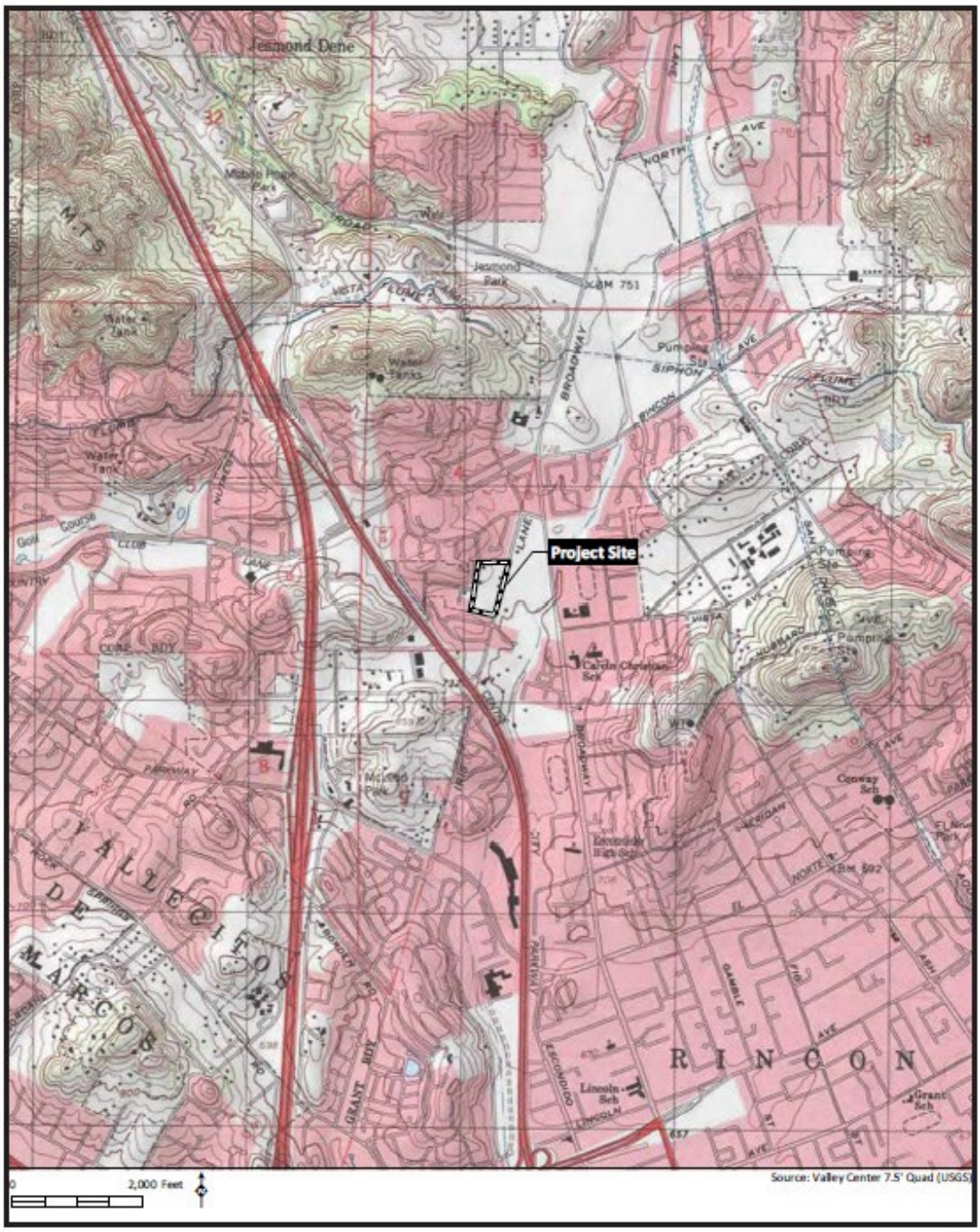


Figure 2-4. Conceptual Site Plan

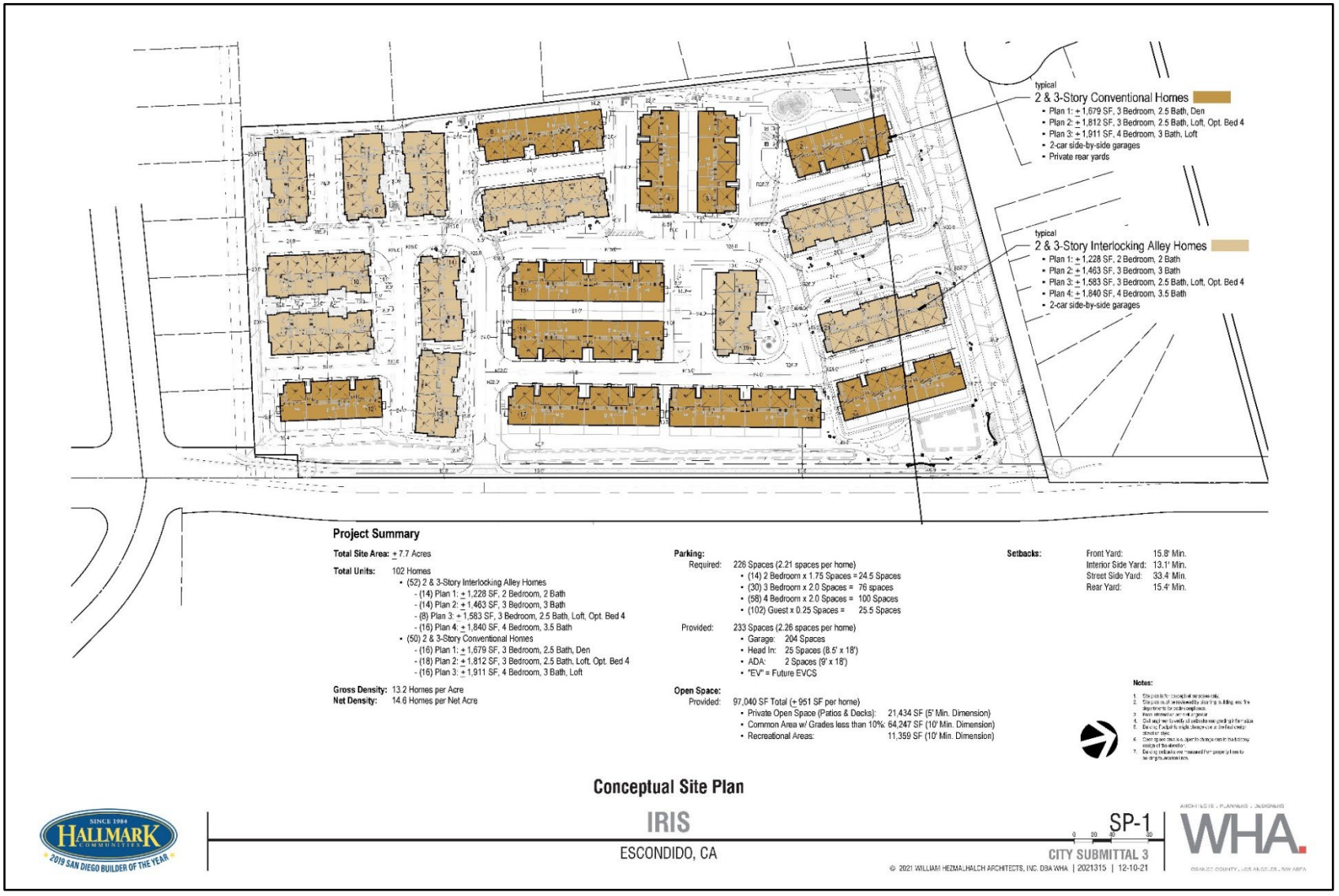


Figure 2-5. Architectural Concepts (4 Plex Conventional Homes)

Right

Rear

Left

Note: Artist's conception; colors, materials and application may vary.

Front

BUILDING MATERIAL

Roof:	Composite Shingle
Exterior:	Stucco Finish, Fiber Cement Siding
Accent Windows:	Fiber Cement Trim
Window & Door Trim:	Stucco over Foam Trim
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Figure 2-6. Architectural Concepts (5 Plex Conventional Homes)

Right

Rear

Left

Note: Artist's conception; colors, materials and application may vary.

Front

BUILDING MATERIAL

Roof:	Composite Shingle
Exterior:	Stucco Finish, Fiber Cement Siding
Accent Windows:	Fiber Cement Trim
Window & Door Trim:	Stucco over Foam Trim
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Figure 2-7. Architectural Concepts (6 Plex Conventional Homes)

Right

Rear

Left

Note: Artist's conception; colors, materials and application may vary.

Front

BUILDING MATERIAL

Roof:	Composite Shingle
Exterior:	Stucco Finish, Fiber Cement Siding
Accent Windows:	Fiber Cement Trim
Window & Door Trim:	Stucco over Foam Trim
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Figure 2-8. Architectural Concepts (4-Plex Alley Homes)

Right

Rear

Left

Note: Artist's conception; colors, materials and application may vary.

Front

BUILDING MATERIAL

Roof:	Composite Shingle
Exterior:	Stucco Finish, Fiber Cement Siding
Accent Windows:	Fiber Cement Trim
Deck Accents:	Metal Railing
Window & Door Trim:	Stucco over Foam Trim
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Figure 2-9. Architectural Concepts (5-Plex Alley Homes)

Right

Rear

Left

Note: Artist's conception; colors, materials and application may vary.

Front

BUILDING MATERIAL

Roof:	Composite Shingle
Exterior:	Stucco Finish, Fiber Cement Siding
Accent Windows:	Fiber Cement Trim
Deck Accents:	Metal Railing
Window & Door Trim:	Stucco over Foam Trim
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Figure 2-10. Architectural Concepts (6-Plex Alley Homes)

Figure 2-11. Open Space Exhibit

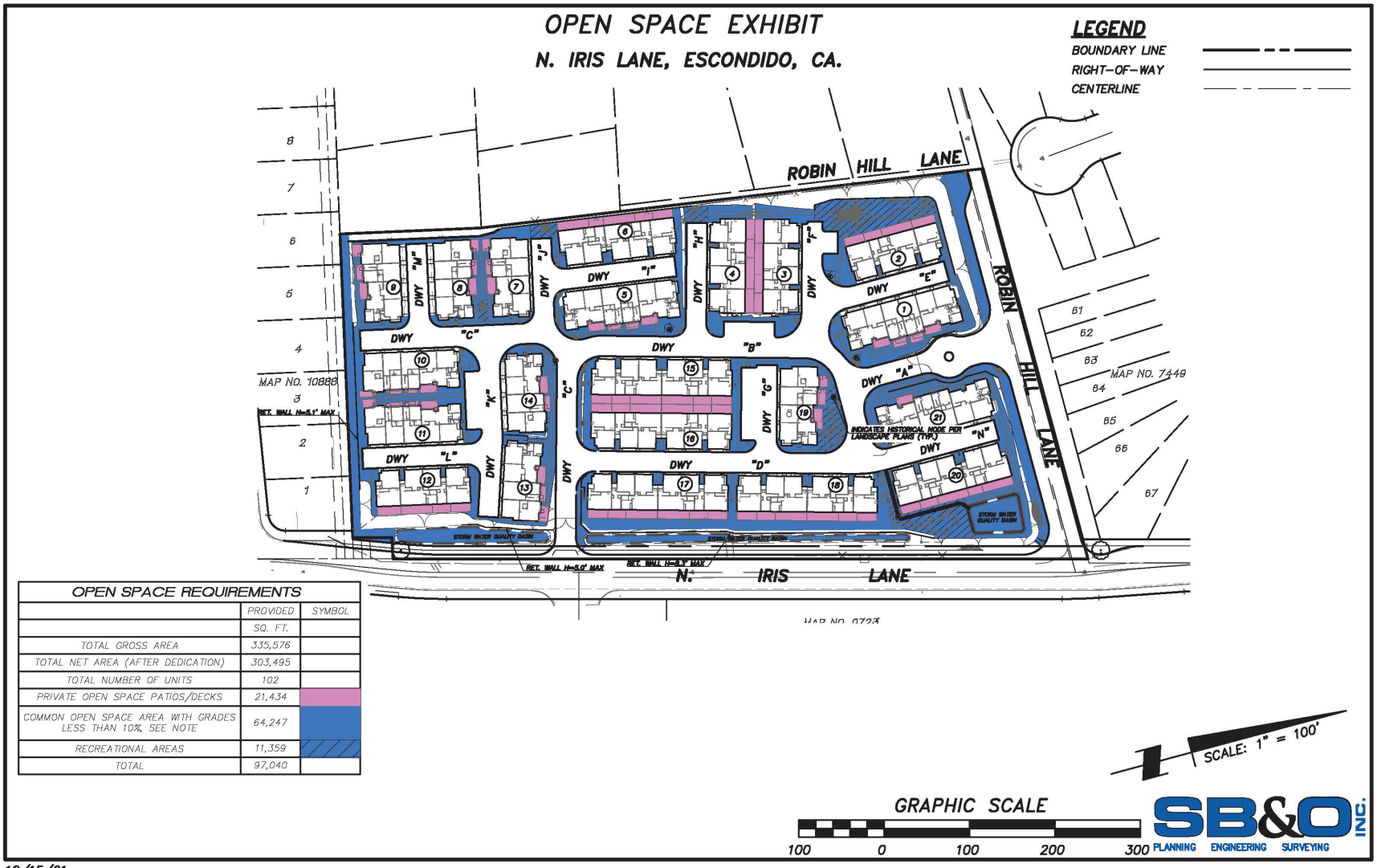


Figure 2-12. Conceptual Fence and Wall Plan

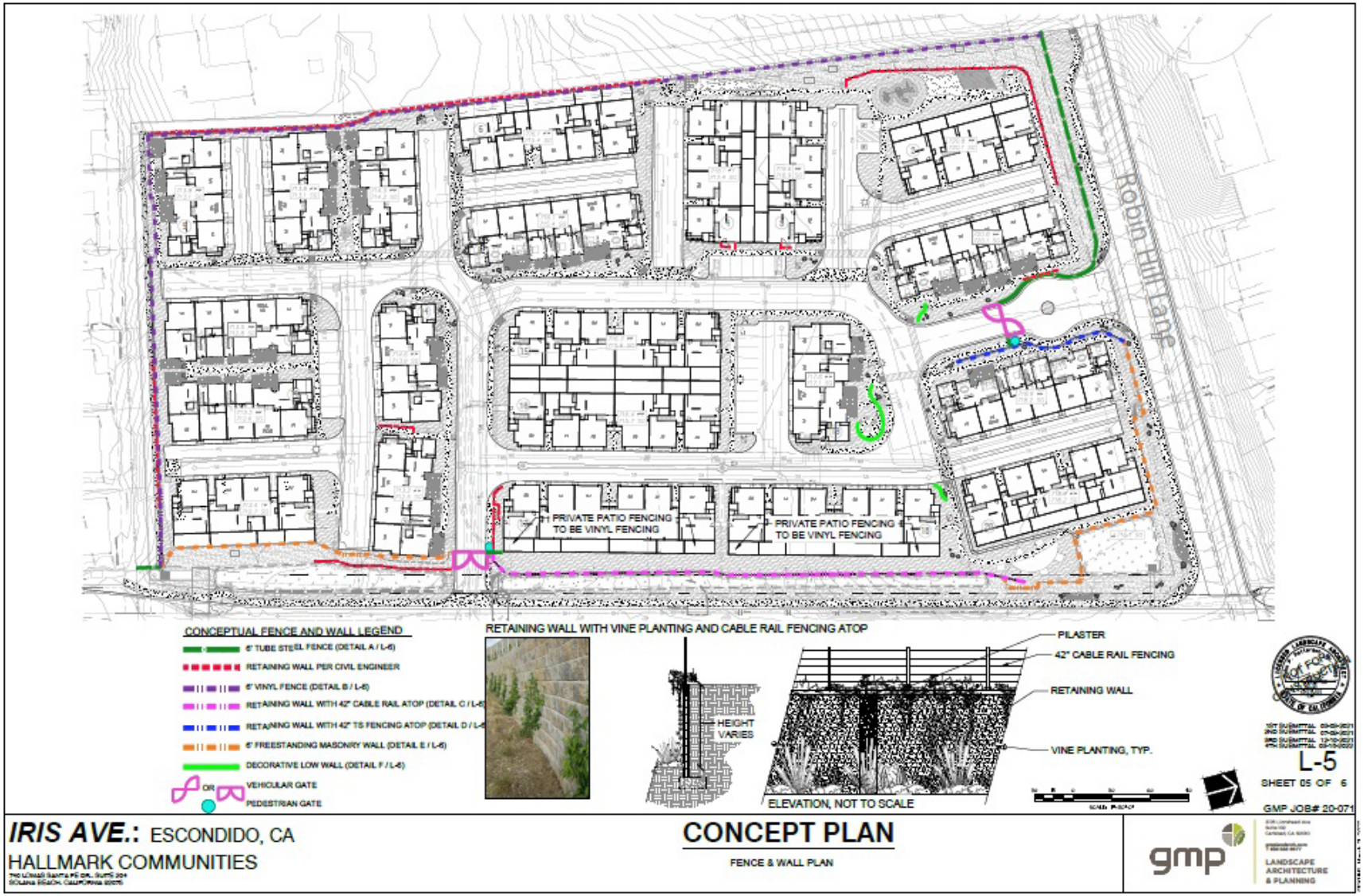


Figure 2-13. Conceptual Landscape Plan

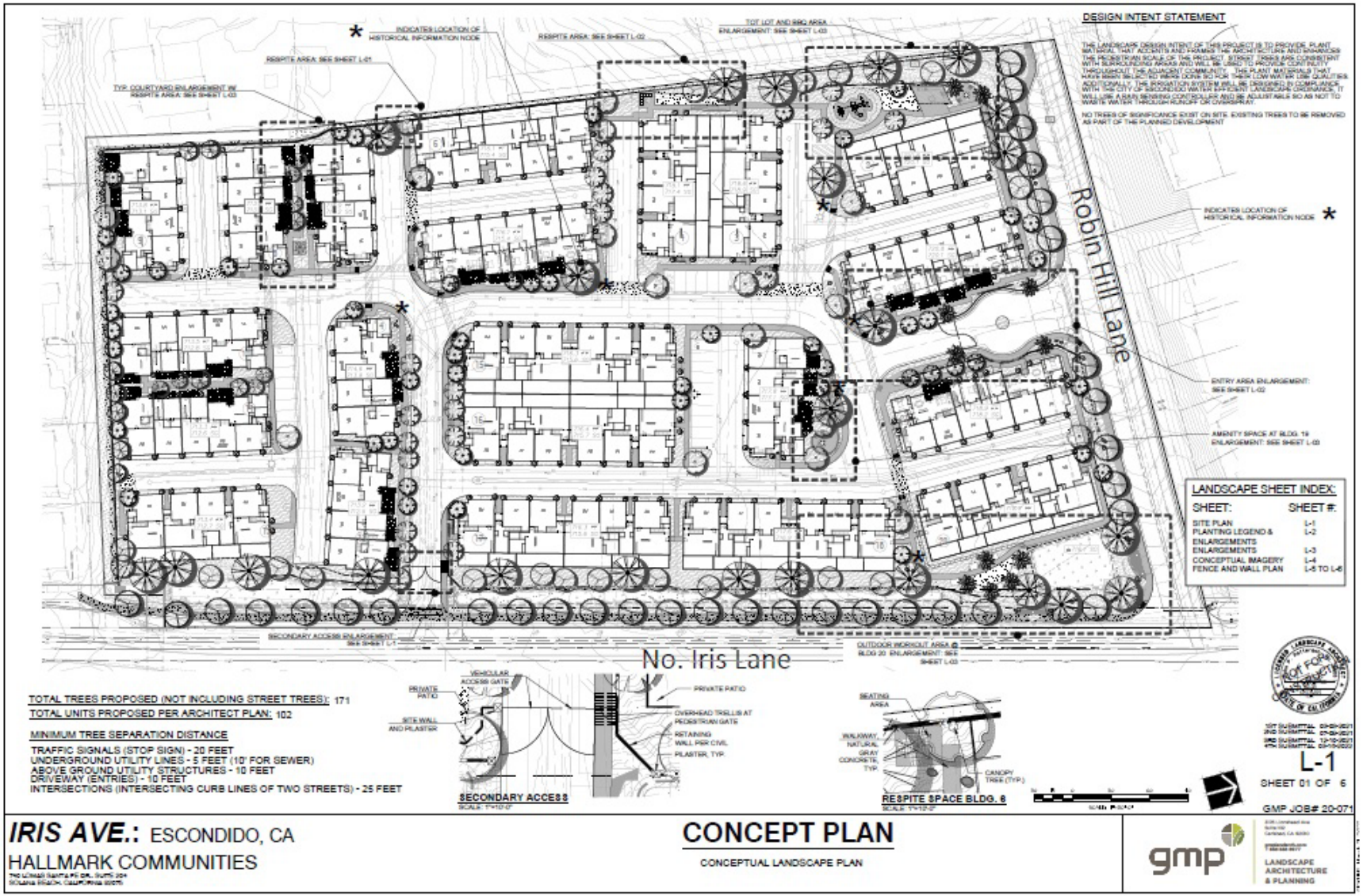


Figure 2-14. Conceptual Landscape Plan (Outdoor Workout Area and Project Entry)

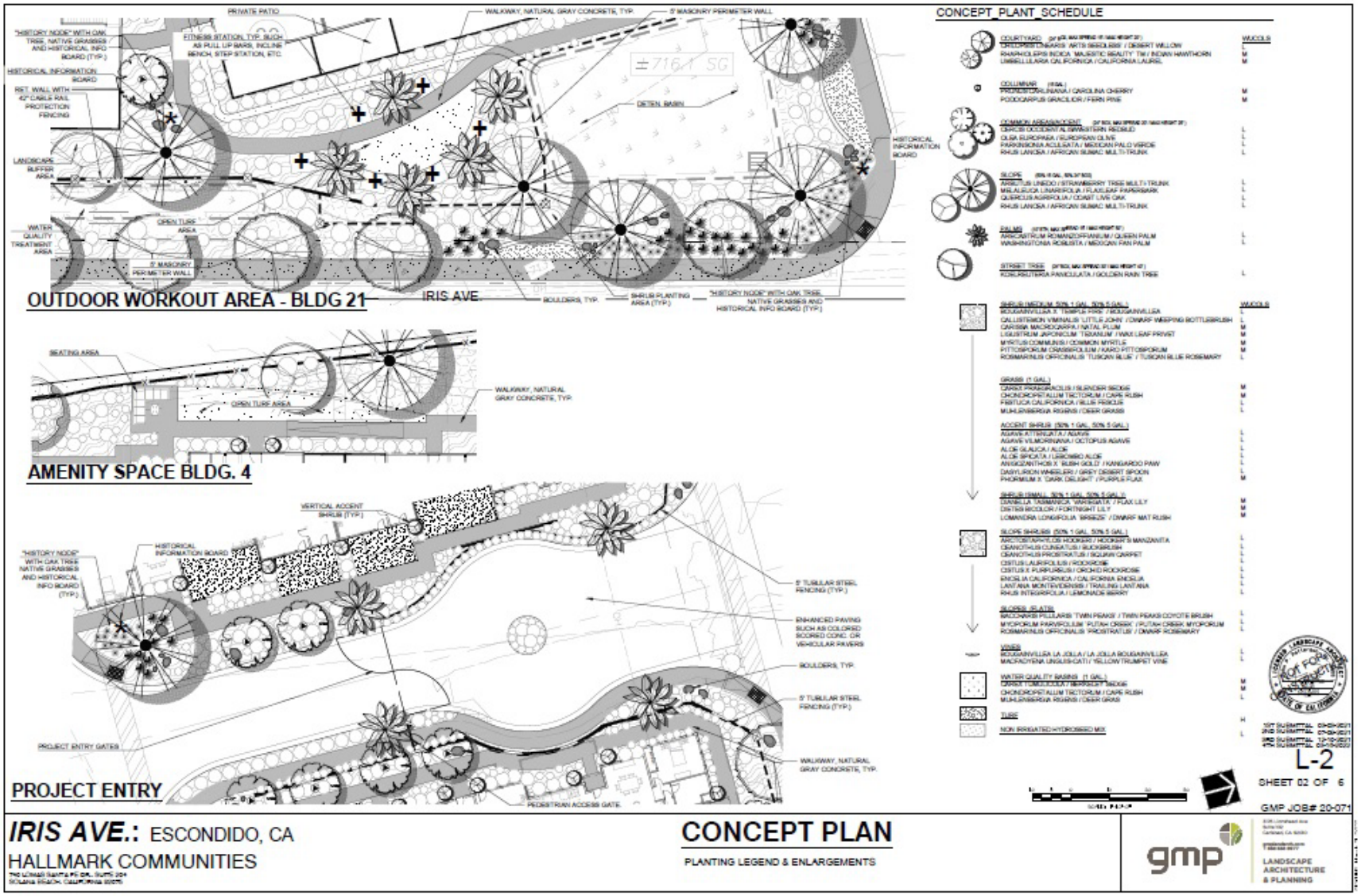


Figure 2-15. Conceptual Landscape Plan (Amenity Space, Tot Lot and Historical Node)

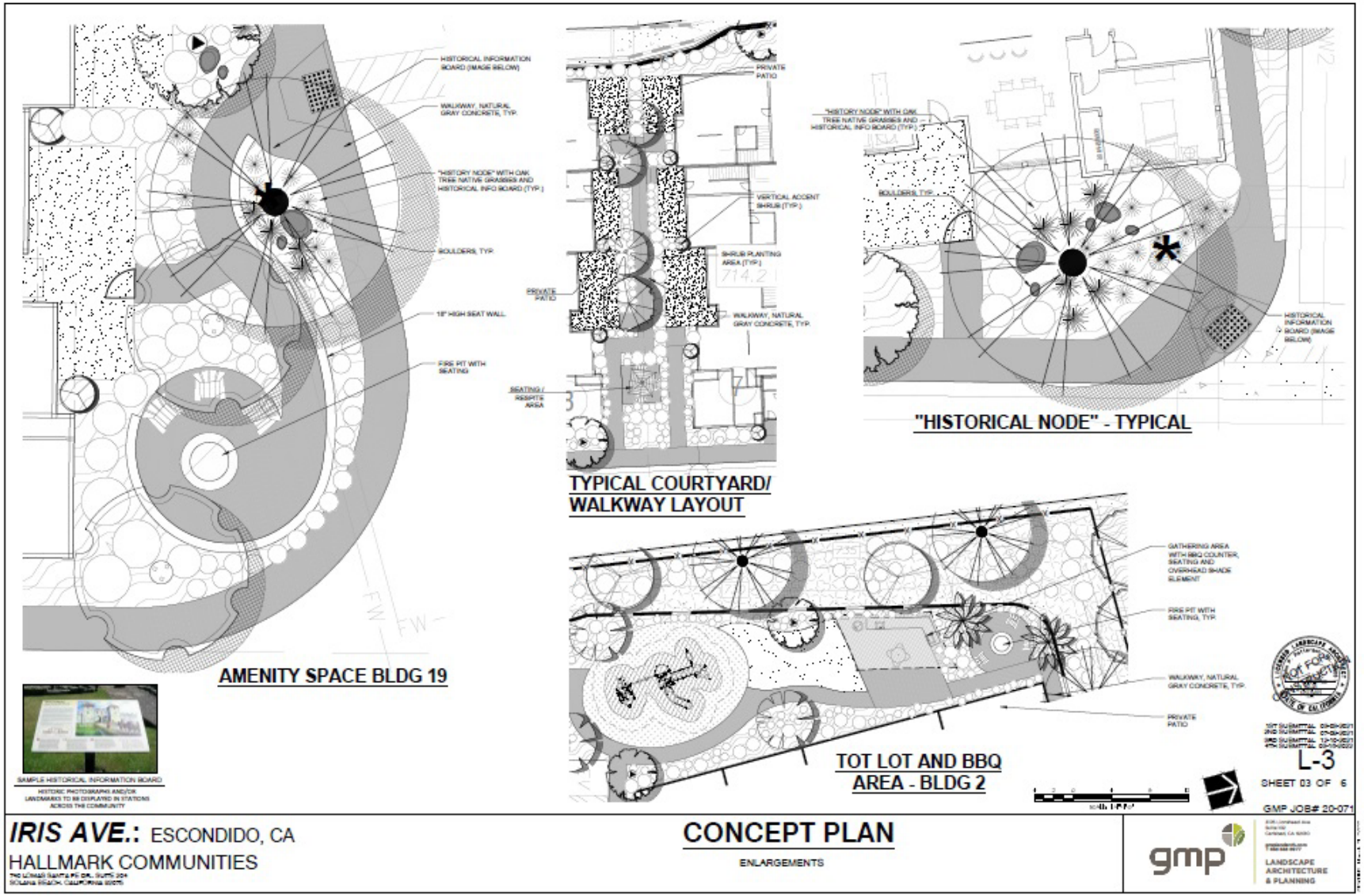


Figure 2-16. Conceptual Landscape Plan (North Iris/Robin Hill Lane)

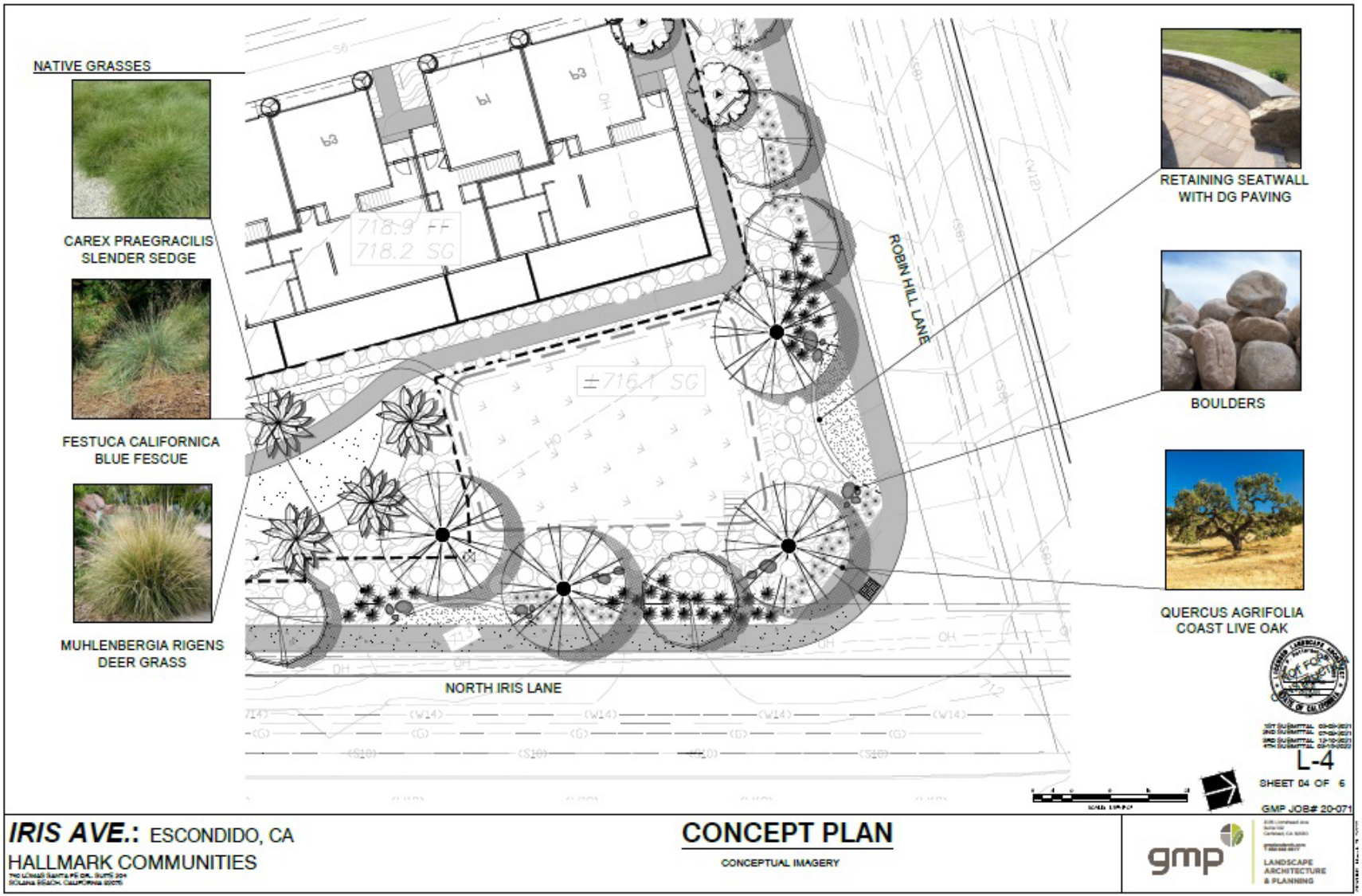
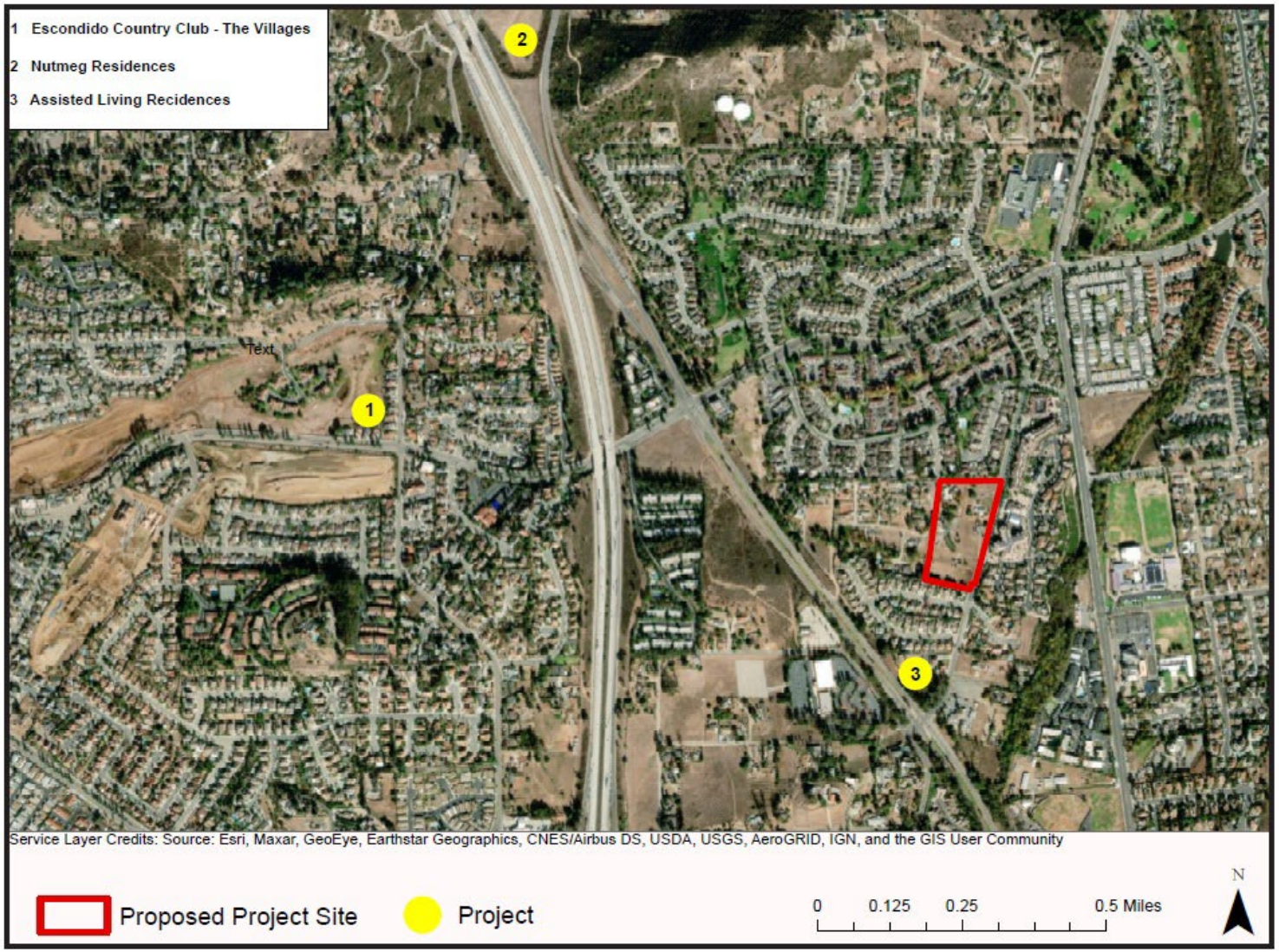


Figure 2-17. Cumulative Projects



3.0 Environmental Impact Analysis

Sections 3.1 through 3.16 provide the project- and cumulative-level environmental impact analysis for the proposed project. The 16 environmental topics analyzed in the EIR are organized as follows:

- **Introduction** – provides a brief overview to each section.
- **Existing Conditions** – describes the existing environmental conditions on the project site as it relates to the specific environmental topic being addressed in the subchapter.
- **Regulatory Setting** – describes the federal, state, regional, and local regulatory requirements applicable to the proposed project.
- **Thresholds of Significance** – describes the thresholds by which the significance of project impacts are determined. A "no impact" conclusion means the project will not have any impacts for a given threshold. A "less than significant impact" conclusion means the project may have an impact; however, the impact is not to a level that would be deemed significant per the given threshold. A "significant impact" means the project has an impact that meets or exceeds a threshold and mitigation is required to reduce the impact.
- **Project Impact Analysis** – analyzes the project-level impacts, by threshold.
- **Cumulative Impact Analysis** – analyzes the cumulative-level impacts of the project. Cumulative projects considered in this analysis are listed in Table 2-e in Chapter 2.0, Project Description.
- **Mitigation Measures** – identifies the mitigation measures to reduce project- and/or cumulative-level impacts to below a level of significance.
- **Conclusion** – briefly summarizes the analysis of each section.

The focus of the environmental analysis in each of the following sections is the suite of proposed actions as described in Chapter 2.0, Project Description.

3.1 Aesthetics

This section of the Environmental Impact Report (EIR) describes the existing aesthetics of the site and surrounding area. It analyzes project impacts on scenic vistas, scenic resources, visual character and quality, and light and glare. General information in this section is taken from the City of Escondido General Plan (General Plan) (City of Escondido 2012a) and Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report (General Plan Program EIR) (City of Escondido 2012b), unless otherwise referenced.

3.1.1 Existing Conditions

3.1.1.1 Existing Visual Landscape

Project Site

The project site is generally flat and currently consists of four single family residences with some outbuildings, an open field area with horses and mature trees located throughout the project site. Per the cultural resources report prepared for the project, the existing homes on the project site were built in the 1950s and 1960s (LME 2021). The project site has a semi-rural feel compared to the denser attached single family development to the north, single family residential to the south, and the three-story Meadowbrook Village senior living community to the east. The greater project vicinity is developed with residential uses in a variety of densities and heights. The area to the west of the project is also within the County jurisdiction and is developed with residential uses with a mix of densities.

Scenic Resources

Scenic resources include elements of both the natural and the built environment. Significant visual resources in Escondido include ridgelines, hillsides, unique landforms such as rock outcroppings, creeks, lakes, and natural open space areas, and agricultural operations. The project site is not located on any ridgelines. The project site is not located in an area identified as an important intermediate or skyline ridgeline in the General Plan (City of Escondido 2012a, Figure VII-5) and there are no scenic resources on the project site. Existing visual resources define a community's character and identity. Scenic vistas, scenic resources, community character and quality, and light and glare are all part of the visual landscape. These features of the existing visual landscape are described below.

Scenic Highways and Vistas

The California Department of Transportation (Caltrans) designates State Scenic Highways to protect public views with high aesthetic value. The project site is located approximately 1.7 miles north of State Route (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 45 miles east of the project site near Anza Borrego (Caltrans 2011). There are no officially-designated or eligible State Scenic Highways within the City of Escondido. However, there are several identified scenic roadways in the City including:

- Interstate 15 (I-15) through the city;
- the segments of Del Dios Highway to Via Rancho Parkway;
- Via Rancho Parkway to Bear Valley Parkway;
- Bear Valley Parkway to Valley Parkway;

- Valley Parkway to Lake Wohlford Road;
- South Citrus Avenue from Bear Valley Road to San Pasqual Valley Road;
- San Pasqual Valley Road/SR-78 from Bear Valley Parkway to the General Plan Update eastern boundary; and
- San Pasqual Road from Bear Valley Parkway to San Pasqual Valley Road are also identified as scenic roadways in the City.

The General Plan also emphasizes the protection of viewsheds that serve as a scenic amenity and contribute to the quality of life for Escondido residents. Valuable scenic vistas include those of hillsides, ridgelines, unique landforms, open space, agricultural areas, and bodies of water.

Light and Glare

Excessive nighttime lighting can interfere with the operation of observatories, affect residents' ability to sleep, affects night sky views, and wildlife. In the City of Escondido, light and glare are of particular concern because of the proximity of Palomar Mountain Observatory, as well as the nuisance that excessive nighttime lighting and glare can create for the City's residents. San Diego County Municipal Code establishes Light Zones to control light pollution around observatories. The area within a 15 mile radius of the center of the Palomar Observatory is included in the definition of Zone A (San Diego County n.d.). The project site is approximately 19 miles southwest of the Palomar Mountain Observatory and would be outside of Light Zone A.

3.1.2 Regulatory Framework

Local Regulations

City of Escondido General Plan

The Resource Conservation Element of the General Plan identifies the visual importance of preserving scenic open space features such as ridgelines, unique landforms, and steep slopes in the City's viewshed. The Land Use and Community Form Element prioritizes preserving the unique community character of Escondido, including the historic downtown, agricultural areas, valleys, and mountains. The Land Use and Community Form Element also address the issues of light pollution and glare. As indicated above, there are no scenic resources on the project site and the site is not located adjacent to a scenic roadway. The applicable goals and policies from these elements are identified below.

Community Character Goal 1: A community composed of distinct residential neighborhoods, business districts, and employment centers, whose urban form reflects the natural environmental setting.

Community Character Policy 1.1: New development should serve to reinforce the City's present development pattern of higher-intensity development within the downtown area and lower-intensity development in outlying areas. As a guide toward accomplishing this objective, new development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses. This policy shall limit density transfers from constrained portions of a property as defined in the land use and open space goals.

Community Character Policy 1.3: Focus development into areas where land use changes achieve the community's long term goals. Facilitate development that is consistent with the build out vision for

each area through incentive programs and efficient administrative and discretionary approval processes for plot plans, Planned Developments, Area Plans, Specific Plans, and Zoning Overlays.

Community Character Policy 1.5: The city should maintain its single-family residential development pattern, except in locations such as the downtown, along major transportation corridors, and around commercial and public activity centers, where higher densities are more appropriate.

Community Character Policy 1.10: Reduce light pollution and preserve views of the night sky through the design and siting of light fixtures to minimize light spill-over onto adjacent properties.

Community Character Policy 1.11: Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).

Resource Conservation Goal 3: Preservation of significant visual resources such as ridgelines, hillsides, and viewsheds that serve as a scenic amenity and contribute to the quality of life for residents.

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

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

Visual Resources Policy3.3: Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.

Escondido Municipal Code

Open Space Development Standards

Article 5, the Open Space Development Standards of the City's Zoning Ordinance, establishes standards for the development of lands identified as having open space value to the community and its citizens in one or more of the following categories: slopes greater than 15%, vegetation conservation areas, and natural drainage courses not otherwise defined as floodways. All developments proposed on these lands must follow certain development standards, including protecting natural features such as rock outcroppings, creeks and other natural drainage courses, and wooded areas; and performing grading for buildings and roads to follow existing site terrain contours, except as necessary for safety.

Outdoor Lighting Ordinance

Article 35 of the City's Zoning Ordinance, referred to as the Escondido Outdoor Lighting Ordinance, is intended to minimize glare, light trespass, and artificial sky glow for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. In Section 33-713, the ordinance defines requirements for outdoor lighting, such as shielding, automatic timing devices, and requiring that certain outdoor light fixtures and lamps be turned off at night.

Grading and Erosion Control

The purpose of Article 55, the Grading and Erosion Control article of the City's Zoning Ordinance, is to assure that development occurs in a manner which protects the natural and topographic character and identity of the environment, the visual integrity of hillsides and ridgelines, sensitive species and unique geologic/geographic features, and the health, safety, and welfare of the general public by regulating grading on private and public property and providing standards and design criteria. In addition to establishing design criteria for grading on steep slopes and ridgelines, the article recommends that grading designs be sensitive to natural topographic, cultural, or environmental features, as well as mature and protected trees, by preserving the following features in permanent open space easements, or such other means which will assure their preservation: undisturbed steep slopes (over 35%); riparian areas, mitigation areas, and areas with sensitive vegetation or habitat; unusual rock outcroppings; other unique or unusual geographic features; and significant cultural or historical features.

Protected Trees

Section 33-1052 of the City's Municipal Code includes definitions for a "mature tree" and a "protected tree" (refer to Section 3.3.2.3). Section 33-1068 of the City's Municipal Zoning Code establishes regulations and standards for the preservation, protection, and selected removal of mature and protected trees. Pursuant to Section 33-1069, every feasible effort and measure to avoid damage to existing trees to remain on site must be taken by the owner and developer during clearing, grading, and construction activities. Section 33-1069 also includes replacement ratios for mature and protected trees.

3.1.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 California Code of Regulations 15000 et seq.) has identified significance criteria to be considered for determining whether a project could have significant impacts on existing aesthetic resources.

An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences:

- **Threshold #1:** Have a substantial adverse impact on a scenic vista;
- **Threshold #2:** Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- **Threshold #3:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality;
- **Threshold #4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.4 Project Impact Analysis

Project construction involves demolition, grading and site preparation activities to prepare the site for future residential buildings, and circulation and infrastructure improvements. Construction could

require staging areas with construction equipment and supplies, and portable trailers to serve as temporary office space or storage. Grading on the site would change or alter the existing topography on the project site to prepare the site for development. The project plans are included in Appendix B.

The project proposes 102 multi-family residential units situated on 7.7 acres. This includes 14 two-bedroom units, 30 three-bedroom units and 58 four-bedroom units. Multi-family residential dwelling units are comprised of one, two, and three-story condominiums. Overall building heights will not exceed 37 feet.

The proposed landscape plan includes a mix of trees, shrubs, grasses and groundcover (Figures 2-14 through 2-17). The intent of the landscape plan is to provide plant material that accent and frame the architecture and enhances the pedestrian scale of the project. The project would plant approximately 171 trees internal to the project plus additional street trees along the project frontages with North Iris Lane and Robin Hill Lane.

Proposed tree species include desert willow, Indian hawthorn, California laurel, Carolina cherry, fern pine, western redbud, European olive, Mexican palo verde, African sumac, strawberry tree, flaxleaf paperbark, coast live oak, queen palm and Mexican fan palm. The proposed street tree species, golden rain tree, is consistent with surrounding areas and would provide continuity throughout the adjacent community.

The project would have a Traditional Farmhouse architectural style. Proposed materials include wood, stucco, siding with decorative trims. The project includes a variety of floor plans to allow for the articulation of the building elevations. One- two- and three-story product types are included with the project. The project proposes ten 4-Plex buildings (40 units), four 5-plex buildings (20 units), and seven 6-plex buildings (42 units) for a total of 102 units. The product type includes interlocking alley homes and conventional homes. The 52 interlocking alley homes would have two to four bedrooms, private decks or patios, and range from 1,228 to 1,840 s.f. The 50 conventional homes would have three for four bedrooms, private rear yards, and range from 1,679 to 1,911 s.f. Architectural concepts for the presented in Chapter 2, Project Description, in Figures 2-5 through 2-10.

Scenic Vistas

Threshold #1: Have a substantial adverse impact on a scenic vista.

Key visual resources in the city are ridgelines, hillsides and viewsheds that serve as scenic amenities. The project site is not located on a ridgeline, hillside or within a scenic viewshed. The project site is situated at a similar elevation as surrounding development and currently supports four single family residences and outbuildings. The project would replace the existing development on the site with 102 multifamily residential units. Given there are no scenic vistas on the project site or in the vicinity, impacts would be **less than significant.**

Scenic Resources

Threshold #2: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

There are no officially-designated or eligible State Scenic Highways within the City of Escondido. However, there are several identified scenic roadways in the City including:

- Interstate 15 (I-15) through the city;

- The segments of Del Dios Highway to Via Rancho Parkway;
- Via Rancho Parkway to Bear Valley Parkway;
- Bear Valley Parkway to Valley Parkway;
- Valley Parkway to Lake Wohlford Road;
- South Citrus Avenue from Bear Valley Road to San Pasqual Valley Road;
- San Pasqual Valley Road/SR-78 from Bear Valley Parkway to the General Plan Update eastern boundary; and
- San Pasqual Road from Bear Valley Parkway to San Pasqual Valley Road are also identified as scenic roadways in the City.

The project site is not located adjacent to any of these scenic roadways.

Based upon the cultural resources report prepared for the project, the existing structures on the proposed project site are not eligible for listing in the National Register of Historic Places or the California Register of Historical Resources and are not considered to be historic resources for the purposes of CEQA. Thus, the project site does not support any historic buildings (LME 2021). Additionally, there are no rock outcroppings on the project site.

The project site includes predominately non-sensitive vegetation. The project would impact a total of 4.9 acres of non-native vegetation, disturbed habitat and developed land. The project would also impact 2.5 acres of non-native grassland and 0.1 acre of disturbed wetland. Project construction also has the potential to impact 11 protected oak trees and 12 mature oak trees both on-site and off-site. Per mitigation measures MM-BIO-4, the project applicant shall replace impacted mature trees at a minimum 1:1 ratio and protected trees at a minimum 2:1 ratio, unless otherwise determined by the City.

In conclusion, the project site is not located within a state scenic highway, will not impact any rock outcroppings or historic buildings and will mitigate for impacts to mature and protected trees, impacts would be **less than significant.**

Visual Character and Quality

Threshold #3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The City of Escondido is considered an urbanized area per the Public Resources Code (PRC). Per PRC Section 21071, an "urbanized area" is defined as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons."

As of the April 2020 the US Census Bureau estimated the population of Escondido is 143,911. persons (USCB 2020). Therefore, the City of Escondido would be considered an urbanized area per CEQA and the first question of this aesthetics threshold does not apply to the proposed project, as it is directed at non-urbanized areas.

The second part of this threshold is for projects in urbanized areas, which is what applies to the project. A significant impact would occur if the project conflicts with the applicable zoning related to scenic quality and other regulations that govern scenic quality. As discussed above, the applicable regulations governing scenic quality include open space development standards, outdoor lighting ordinance, grading and erosion control, and the protected trees ordinance.

The project site is currently located within the jurisdiction of San Diego County and is zoned Village Residential (VR-24), which allows up to 24 dwelling unit/acre (du/ac). Within the City's General Plan, the site currently has a land use designation of Suburban, which allows for up to 3.3 du/ac. Therefore, both planning documents have identified a residential use on the site. The project proposes an annexation into the city along with a proposed zoning of Urban 3 (13.2 du/ac), which would be less density than the County's designation but higher than the City's designation. The proposed actions for the project including, the annexation, a General Plan Amendment from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre), a Prezone/Rezone to Planned Development – Residential (PD-R 13.2) with a density of 13.2 units/acre (there is no Existing City zoning on the site), and a Master and Precise Development Plan in accordance with Escondido Municipal Code, Chapter 33 – Zoning, Article 19. Planned Development (P-D Zone)would clarify the zoning for the site and make the project site consistent with the neighboring residential development. .

The project has been designed in a manner to not conflict with the regulations that govern scenic quality. The project would comply with the City's Open Space Development Standards, Outdoor Lighting Ordinance, Grading and Erosion Control Ordinance and the City's tree protection ordinance.

The project incorporates a high quality architectural design with a Traditional Farmhouse architectural style. Proposed materials include wood, stucco, siding with decorative trims. The project includes a variety of floor plans to allow for the articulation of the building elevations. Overall building heights would not exceed 37 feet. The project would develop the site in an orderly fashion with a comprehensive design concept, landscape plan, and wall/fencing plan. Walls and fencing will be six feet or less and the landscaping plan will soften the look of the walls and fencing (Figure 2-12). Therefore, the project will not substantially degrade the existing visual character or quality of the site and its surroundings and will not conflict with applicable regulations governing scenic quality. Impacts would be **less than significant.**

Lighting and Glare

Threshold #4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The site currently includes four single-family residences with typical exterior lighting for residential uses. The proposed residential development would demolish the existing residences and replace them with 102 multifamily units. Nighttime exterior lighting would be provided on the residential development site for safety, security, and circulation purposes. Different exterior lighting fixtures would be used, including pole-mounted streetlights and wall-mounted residential lights.

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

The project would have a Traditional Farmhouse architectural style. Proposed materials would not be glare inducing and include wood, stucco, and siding with decorative trims. For these reasons, impacts related to new sources of lighting and glare would be **less than significant**.

3.1.5 Cumulative Impact Analysis

The analysis above finds that the proposed project would have a less than significant aesthetics impacts. None of the other cumulative projects are in the same viewshed as the proposed project. Similar to the proposed project, future development in the City, including the cumulative project identified in Table 2-2 would comply with City policies related to visual quality, including open space development standards, lighting standards, grading standards and protected tree policies. Cumulative impacts would be **less than significant**.

3.1.6 Mitigation Measures

Based upon the analysis presented in Sections 3.1.4 and 3.1.5 the proposed project would not have any significant aesthetics impacts and no mitigation measures are required.

3.1.7 Conclusion

Scenic Vistas

Key visual resources in the city are ridgelines, hillsides and viewsheds that serve as scenic amenities. The project site is not located on a ridgeline, hillside or within a scenic viewshed. The project site is situated at a similar elevation as surrounding development and currently supports four single family residences and outbuildings. The project would replace the existing development on the site with 102 multifamily residential units. Given there are no scenic vistas on the project site or in the vicinity, impacts would be **less than significant.**

Scenic Resources/State Scenic Highway

In conclusion, the project site is not located within a state scenic highway, will not impact any rock outcroppings or historic buildings and will mitigate for impacts to mature and protected trees. Impacts would be **less than significant**.

Visual Character and Quality

The project has been designed in a manner to not conflict with the regulations that govern scenic quality. The project would comply with the City's Outdoor Lighting Ordinance and the City's tree protection ordinance. The project incorporates a high quality architectural design with a Traditional Farmhouse architectural style. Proposed materials include wood, stucco, siding with decorative trims. The project includes a variety of floor plans to allow for the articulation of the building elevations. Overall building heights would not exceed 37 feet. The project would develop the site in an orderly fashion with a comprehensive design concept, landscape plan, and wall/fencing plan. Walls and fencing will be six feet or less and the landscaping plan will soften the look of the walls and fencing. Therefore, the project will not substantially degrade the existing visual character or quality of the site and its surroundings and impacts would be **less than significant**.

Lighting and Glare

Consistent with Article 35 of the Zoning Ordinance, all exterior lighting fixtures, with the exception of streetlamps would be aimed or shielded so that unnecessary nighttime lighting and glare are reduced for the benefit of the citizens of the city and astronomical research at Palomar Mountain Observatory. The project would have a Traditional Farmhouse architectural style. Proposed materials would not be glare inducing and include wood, stucco, and siding with decorative trims. For these reasons, impacts related to new sources of lighting and glare would be **less than significant**.

3.2 Air Quality

This section of the Environmental Impact Report (EIR) describes the existing setting, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. This section is based on the Air Quality Study prepared for the proposed project by LDN Consulting on July 26, 2022 (LDN 2022a). The complete air quality report included as Appendix C of the EIR. Background information was taken from the Escondido General Plan Update and City of Escondido Municipal Code, unless otherwise referenced.

3.2.1 Existing Conditions

This section introduces the meteorologic/climate conditions for the project area and presents the current physical setting and pollutant levels in the proximity of the proposed project.

The project site lies in the northern portion of the County of San Diego in the City of Escondido, which is part of the San Diego Air Basin (SDAB). The existing site is occupied by residential uses. The project would demolish approximately 10,000 square feet (sf) of existing buildings prior to construction. The site is mostly disturbed and is surrounded by residential uses. Elevations onsite average about 720 feet above sea level.

3.2.1.1 Meteorology/ Climate

Climate within the SDAB area often varies dramatically over short geographical distances with cooler temperatures on the western coast gradually warming to the east as prevailing winds from the west heats up. Most of southern California is dominated by high-pressure systems for much of the year, which keeps San Diego mostly sunny and warm. Typically, during the winter months, the high-pressure systems drop to the south and brings cooler, moister weather from the north.

Meteorological trends within Escondido produce daytime highs ranging between 65° Fahrenheit (F) in the winter to approximately 88°F in the summer with August usually being the hottest month. Median temperatures range from approximately 57°F in the winter to approximately 78°F in the summer. Precipitation is generally about 16.2 inches per year. Prevailing wind patterns for the area vary during any given month during the year and also vary depending on the time of day or night. The predominant pattern though throughout the year is usually from the west or westerly (LDN 2022a).

3.2.1.2 Baseline Air Quality

Regional

The project site is located in the land use jurisdictions of the City of Escondido (City) within the County of San Diego, within the northern portion of the SDAB under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The SDAB is one of 15 air basins that geographically divide the State of California.

Project area air quality can best be characterized from ambient measurements made by the SDAPCD. SDAPCD operates a network of ambient air monitoring stations throughout San Diego County, which measure ambient concentrations of pollutants and determine whether the ambient air quality meets national and state air quality standards. Pursuant to the 1990 Clean Air Act amendments, U.S. Environmental Protection Agency (USEPA) classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Generally, if the recorded concentrations of a pollutant are

lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. As explained further below, these standards are set by EPA or the California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, calls for the designation of areas as "attainment" or "nonattainment," but based on the California Ambient Air Quality Standards (CAAQS) rather than the NAAQS.

Current attainment designations for the SDAB are presented in **Table 3.2-1.** As shown, the SDAB currently exhibits a non-attainment status for the federal 8-hour standard for ozone (O_3). Additionally, the SDAB is either in attainment or unclassified for federal standards of 1-hour O_3, carbon monoxide (CO), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). The SDAB is also in attainment of state air quality standards for all pollutants except for O_3, PM_{10}, and $PM_{2.5}$.

Table 3.2-1. San Diego County Air Basin Attainment Status by Pollutant

Criteria Pollutant	Federal Designation	State Designation
Ozone (O_3) – 8-hour	Nonattainment	Nonattainment
Ozone (O_3) – 1-hour	Attainment(1)	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Respirable Particulate Matter (PM_{10})	Unclassifiable(2)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Attainment	Nonattainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead (Pb)	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility Reducing Particles	No Federal Standard	Unclassified

Source: SDAPCD 2021a.

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

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

Table 3.2-2. Two-Year Ambient Air Quality Summary Near the Project Site

Pollutant	Closest Recorded Ambient Monitoring Site	Averaging Time	CAAQS[1]	NAAQS[2]	2019	2020	Days Exceeded Over 2 Years
O_3	Camp Pendleton	1 Hour	0.09 ppm[3]	No Standard	0.08	0.09	0
		8 Hour	0.070 ppm	0.070 ppm	0.06	0.07	3
PM_{10}	Data not available for monitoring sites near Project Site	24 Hour	50 µg/m3	150 µg/m3	-	-	N/A
		Annual Arithmetic Mean	20 µg/m3	No Standard	-	-	N/A
$PM_{2.5}$	Carmel Mountain Ranch	24 Hour	No Standard	35 µg/m3	18.9	40.2	N/A
		Annual Arithmetic Mean	12 µg/m3	15 µg/m3	8.2	9.3	N/A
NO_2	Camp Pendleton	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	0.014	0.013	N/A
		1 hour	0.18 ppm	0.100	0.086	0.056	N/A
CO	Carmel Mountain Ranch	1 Hour	20 ppm	35 ppm	4.1	3.3	N/A
		8 Hour	9 ppm	9 ppm	2.5	1.7	N/A

Source: LDN Consulting 2022a.

Notes: (1) CAAQS= California Ambient Air Quality Standards
(2) NAAQS- National Ambient Air Quality Standards
(3) PPM – Parts Per Million
(4) Maximum levels marked with "-" indicate data was not available for either monitoring station.
(5) Days exceeded marked with "N/A" indicate no data available
(6) SO_2 is only monitored at the El Cajon Monitoring Station. Within the entire County of San Diego, SO_2 emissions within the County are essentially Zero for all metrics including the Average, Maximum 24-hour and 1-hour standards. The highest 1-hour measurement identified is 0.004 ppm and the most restrictive standard (CAAQS for SO_2) is 0.25ppm.

Local

The SDAPCD is responsible for monitoring and reporting monitoring data. SDAPCD operates 10 monitoring sites, which collect data on criteria pollutants. The project is closest to the Carmel Mountain Ranch and Camp Pendleton Monitoring stations which are located approximately 10 and 18 miles respectively from the project site. Because each site logs different data, both sites were used to report

ambient air quality data, representative of the project site. **Table 3.2-2** summarizes the two most recent years of monitoring data.

3.2.1.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by CARB, include children, the elderly, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors in the project area include the single-family residences to the south and west of the project site, attached single-family residences north of Robin Hill Lane, and the Meadowbrook Village care facility (a mix of semi-independent and congregate care units).

3.2.1.4 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. The criteria air pollutants that are monitored by the EPA are ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter less than or equal to 10 microns or 2.5 microns in diameter (PM_{10}, and $PM_{2.5}$) sulfur dioxide (SO_2), and lead (Pb). These pollutants, as well as toxic air contaminants (TACs), are discussed in the following text. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. Examples of sources and effects of these pollutants are identified below:

Ozone (O_3): A strong smelling, pale blue reactive toxic chemical gas consisting of three oxygen atoms. It is a product of the photochemical process involving the sun's energy. O_3 exists in the upper atmosphere O_3 layer, as well as at the earth's surface. O_3 at the earth's surface causes numerous adverse health effects, including lung inflammation, tissue damage, and impaired lung functioning, is a major component of smog, and can damage materials such as rubber, fabrics, and plastics.

Carbon Monoxide (CO): Carbon monoxide is a colorless, odorless, tasteless, and toxic gas resulting from the incomplete combustion of fossil fuels. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects including fatigue, headaches, confusion, and dizziness.

Nitrogen Dioxide (NO_2): NO_2 is formed when nitrogen (N_2) combines with oxygen (O_2). Its life span in the atmosphere ranges from one to seven days. NO_2 is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO_2 may result in numerous adverse health effects, including respiratory damage. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility.

Particulate Matter Less Than or Equal to 10 Microns in Diameter (PM_{10}): A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (equal to 10 microns or smaller, about 0.0004 inch or less in diameter) allows them to easily

enter the lungs where they may be deposited, resulting in adverse health effects, including allergies, asthma, and respiratory illness. PM_{10} also causes visibility reduction.

Particulate Matter Less Than or Equal to 2.5 Microns in Diameter ($PM_{2.5}$): A similar air pollutant consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which are often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO_2 released from power plants and industrial facilities and nitrates that are formed from NO_x released from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles depends mostly on location of the emissions, time of year, and weather conditions. Adverse health effects of $PM_{2.5}$ are similar to those of PM_{10}.

Sulfur Dioxide (SO_2): A typically strong smelling, colorless gas that is formed by the combustion of fossil fuels. SO_2 and other sulfur oxides contribute to the problem of acid deposition as well as adverse health effects including respiratory constriction and, with continued exposure, increased incidents of pulmonary symptoms.

Lead (Pb): Lead in the atmosphere occurs as particulate matter. Lead has historically been emitted from vehicles combusting leaded gasoline, as well as from industrial sources. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Lead has the potential to accumulate over time and cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Lead is also classified as a probable human carcinogen.

Non-Criteria Air Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by several sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

CARB classified "particulate emissions from diesel -fueled engines" (i.e., diesel particulate matter [DPM]) as a TAC in August 1998. DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks.

DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM. To reduce the cancer risk associated with diesel particulate matter, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000).

3.2.2 Regulatory Framework

The following section provides a general description of the applicable regulatory requirements pertaining to air quality, including federal, state and local guidelines.

3.2.2.1 Federal

Federal Clean Air Act

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The U.S. Environmental Protection Agency is responsible for implementing most aspects of the Clean Air Act, including setting National ambient air quality standards (NAAQS) for major air pollutants, setting hazardous air pollutant standards, approving state attainment plans, setting motor vehicle emission standards, issuing stationary source emission standards and permits, and establishing acid rain control measures, stratospheric O3 protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the criteria pollutants O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead and shown in **Table 3.2-3.**

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a State Implementation Plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

These plans must include pollution control means that demonstrate how the standards will be met as expeditiously as possible.

The NAAQS were amended in July 1997 to include an additional standard for O_3, and to adopt a standard for fine particulates ($PM_{2.5}$). In June 2002, a stringent statewide $PM_{2.5}$ standard was adopted. In 2012, the $PM_{2.5}$ standard was lowered further based on air quality monitoring data.

National Ambient Air Quality Standards (NAAQS)

To gauge the significance of the air quality impacts of the proposed project, those impacts, together with existing background air quality levels, must be compared to the applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect public health and welfare. Primary standards set limits for the protection of public health, including those people most susceptible to further respiratory distress such as asthmatics, children, and the elderly, or sensitive receptors. Secondary standards set limits to protect public welfare and include protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Research has shown that chronic exposure to O_3 at levels that just marginally meet clean air standards may nevertheless have adverse health effects. State and federal agencies,

therefore, have promulgated a more stringent 8-hour O_3 standard that better reflects human health response to more chronic exposure, shown in Table 3.2-3.

Table 3.2-3. Ambient Air Quality Standards

Pollutant	Average Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Measurement Method[7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m3)	Ultraviolet Photometry		Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m3)		0.070 ppm (137 µg/m3)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 µg/m3	Gravimetric or Beta Attenuation	150 µg/m3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m3				
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	No Separate State Standard		35 µg/m3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m3	Gravimetric or Beta Attenuation	12.0 µg/m3	15 µg/m3	
Carbon Monoxide (CO)	8 hour	9.0 ppm (10mg/m3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m3)	-	Non-Dispersive Infrared Photometry
	1 hour	20 ppm (23 mg/m3)		35 ppm (40 mg/m3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m3)				
Nitrogen Dioxide (NO_2)[10]	Annual Arithmetic Mean	0.030 ppm (57 µg/m3)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m3)[8]	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.18 ppm (339 µg/m3)		0.100 ppm[8] (188/ µg/m3)	-	
Sulfur Dioxide (SO2)[11]	Annual Arithmetic Mean	-	Ultraviolet Fluorescence	0.030 ppm[10] (for Certain Areas)	-	Ultraviolet Flourescence; Spectrophotometry (Pararoosaniline Method)[9]
	24 Hour	0.04 ppm (105 µg/m3)		0.14 ppm[10] (for Certain Areas) (See Footnote 9)	-	
	3 Hour			-	0.5 ppm (1300 µg/m3)	
	1 Hour	0.25 ppm (655 µg/m3)		75 ppb (196 µg/m3)	-	

Pollutant	Average Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Measurement Method[7]
Lead[12,13]	30 Day Average	1.5 µg/m3	Atomic Absorption	-		-
	Calendar Quarter	-		1.5 µg/m3	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average	-		0.15 µg/m3		
Visibility Reducing Particles	8 Hour	See footnote 13				
Sulfates	24 Hour	25 µg/m3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m3)	Gas Chromatography			

California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m3 to 12.0 µg/m3 . The existing national 24- hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3 , as was the annual secondary standard of 15 µg/m3 . The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

Pollutant	Average Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Measurement Method[7]
On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.						
The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.						
The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.						
In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.						

Source: CARB 2016, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf
ppm = parts per million
µg/m^3 = micrograms per cubic meter
mg/m^3= milligrams per cubic meter

3.2.2.2 State

California Ambient Air Quality Standards (CAAQS)

In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

The CARB has established California ambient air quality standards (CAAQS), which are generally more restrictive than the NAAQS. The CAAQS describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. Additionally, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants in California. The CAAQS currently in effect in California are also shown in Table 3.2-3 and include the most recently adopted federal standards for chronic (8-hour) O_3 exposure and for ultra-small diameter particulate matter of 2.5 microns or less in diameter ($PM_{2.5}$). CAAQS restrict four additional contaminants: visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Current attainment designations for the SDAPCD are presented in Table 3.2-1.

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practical date. Air pollution from commercial and industrial facilities is regulated by local air quality management districts, whereas mobile sources of air pollution are regulated by the California Air Resources Board (CARB) and the EPA. All air pollution control districts have been formally designated as "attainment" or "nonattainment" for each state air quality standard, as shown in Table 3.2-2. Areas in California where ambient air concentrations of pollutants are higher than the state standard are considered to be in "non-attainment" status for that pollutant. Non-attainment designations are categorized into three levels of severity: (1) moderate, (2) serious, and (3) severe. If there are inadequate or inconclusive data to make a definitive attainment designation, districts are considered "unclassified."

Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill 2588)

The Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release in California. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

CARB Regulation for In-Use Off-Road Diesel Vehicles

On July 26, 2007, the California Air Resources Board (CARB) adopted California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 to reduce diesel particulate matter (DPM) and NOx emissions from in-use off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation limits idling to no more than five consecutive minutes, requires reporting and labeling, and requires disclosure of the regulation upon vehicle sale. Performance requirements of the rule are based on a fleet's average NOx emissions, which can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits. The regulation was amended in 2010 to delay the original timeline of the performance requirement making the first compliance deadline January 1, 2014 for large fleets (over 5,000 horsepower), 2017 for medium fleets (2,501-5,000 horsepower), and 2019 for small fleets (2,500 horsepower or less). Currently, no commercial operation in California may add any equipment to their fleet that has a Tier 0 or Tier 1 engine. By January 1, 2018 medium and large fleets were restricted from adding Tier 2 engines to their fleets and by January 2023, no commercial operation will be allowed to add Tier 2 engines to their fleets. It should be noted that commercial fleets may continue to use their existing Tier 0 and 1 equipment, if they can demonstrate that the average emissions from their entire fleet emissions meet the NOx emissions targets.

CARB Resolution 08-43 for On-Road Diesel Truck Fleets

On December 12, 2008, the CARB adopted Resolution 08-43, which limits NOx, PM_{10} and $PM_{2.5}$ emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, Title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final) or later emission standards. In the interim period, this regulation provides annual interim targets for fleet owners to meet. By January 1, 2014, 50 percent of a truck fleet is required to have installed Best Available Control

Technology (BACT) for NOx emissions and 100 percent of a truck fleet installed BACT for PM_{10} emissions. This regulation also provides a few exemptions including a onetime per year 3-day pass for trucks registered outside of California. All on-road diesel trucks utilized during construction of the proposed project will be required to comply with Resolution 08-43.

3.2.2.3 Regional/ Local

San Diego Air Pollution Control District

Although CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The project is located within the SDAB and is subject to SDAPCD guidelines and regulations. In San Diego County, O_3 and particulate matter are the pollutants of main concern, because exceedances of the CAAQS for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM_{10}, $PM_{2.5}$, and O_3 (1-hour and 8-hour) standards. San Diego County is currently designated as a Serious Nonattainment Area for the 2008 ozone NAAQS (75 ppb), and a Moderate Nonattainment Area for the 2015 ozone NAAQS (70 ppb). Accordingly, the SDAPCD must prepare and submit to the EPA, via CARB, two ozone SIPs identifying control measures and associated emissions reductions necessary to demonstrate attainment of the 75-ppb standard by July 20, 2021 (2020 attainment year) and attainment of the 70-ppb standard by August 3, 2024 (2023 attainment year). The 2020 Plan for Attaining the National Ozone Standards (SDAPCD 2020) addresses all requirements for both ozone standards.

SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The Regional Air Quality Strategy (RAQS) for the SDAB was initially adopted in 1991 and is updated every 3 years (most recently in 2016) (SDAPCD 2016). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The RAQS details how the region will manage and reduce O_3 precursors (NOx and VOCs) by identifying measures and regulations intended to reduce these contaminants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS.

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans. Projects that produce less growth than predicted by SANDAG would generally conform to the RAQS.

In December 2005, SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill (SB) 656 in San Diego County (SB 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$. In the report, SDAPCD evaluates the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion (SDAPCD 2005).

The following lists the SDAPCD rules that are applicable but not limited to all residential projects in the Air Basin (SDAPCD 2021b).

SDAPCD Regulation II: Permits; Rule 20.2 – New Source Review Non-Major Stationary Sources: Rule 20.2 requires a new or modified emissions units (that are not major stationary sources), with the potential to emit 10 pounds per day or more of VOC, NOx, SOx, or PM_{10} to be equipped with best available control technology (BACT). For those units with a potential to emit above Air Quality Impact Assessments Trigger Levels, the units must demonstrate that such emissions would not violate or interfere with the attainment of any national air quality standard.

SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions. Prohibits discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any period of 60 consecutive minutes that is darker in shade than that designated as Number 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as Number 1 on the Ringelmann Chart.

SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance. Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property. Compliance with Rule 51 will reduce local air quality and odor impacts to nearby sensitive receptors.

SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings. Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

SDAPCD Regulation XIII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants- New Source Review. Requires evaluation of potential health risks for any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminants. The rule requires that projects that propose to increase cancer risk between 1 and 10 in one million need to implement toxics best available control technology (T-BACT) or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall the project increase the cancer risk to over 10 in one million. Projects creating cancer risks less than one in one million are not required to implement T-BACT technology.

SDAPCD Regulation XIII: Toxic Air Contaminants; Rule 1210: Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction. Under Rule 1210 (adopted in 1996 and revised several times, most recently 2021), emissions of TACs that result in a cancer risk of 10 in 1 million or less and a health hazard index of one or less would not be required to notify the public of potential health risks. If a project has the potential to result in emissions of any TAC or hazardous air pollutants (HAP) that results in a cancer risk of greater than 10 in 1 million, the project would be deemed to have a potentially significant impact and would be required to implement toxics best available control technology (T-BACT).

City of Escondido General Plan

The City of Escondido General Plan (City of Escondido 2012) includes policies that address air quality and greenhouse gas emissions. Relevant policies to the proposed project are identified below. Refer to Section 3.10, Land Use and Planning for an analysis of proposed project consistency with General Plan goals and policies.

Air Quality and Climate Protection Goal 7: Improved air quality in the city and the region to maintain the community's health and reduce green-house gas emissions that contribute to climate change.

Air Quality and Climate Protection Policy 7.3: Require that new development projects incorporate feasible measures that reduce construction and operational emissions.

City of Escondido Municipal Code

The City of Escondido has established thresholds in Section 33-924 of Article 47 in Chapter 33 of the Municipal Code to address and implement CEQA guidelines that should be used for the preparation of Air Quality Impact Assessments (AQIA). The Code provides screening criteria that can be used to demonstrate that a project's total emissions would not result in a significant impact as defined by CEQA. Should emissions be found to exceed these thresholds, additional modeling is required to demonstrate that the project's total air quality impacts are below the state and federal ambient air quality standards. The screening thresholds for construction and daily operations are shown in **Table 3.2-4.**

Table 3.2-4. Screening-Level Criteria for Air Quality Impacts

Pollutant	Total Emissions (Pounds/Day)
Construction Emissions	
Respirable Particulate Matter (PM_{10})	100
Particulate Matter ($PM_{2.5}$)	55
Nitrogen Oxide (NO_x)	250
Sulfur Oxide (SO_x)	250
Carbon Monoxide (CO)	550
Volatile Organic Compounds (VOCs)	75
Operational Emissions	
Respirable Particulate Matter (PM_{10})	100
Particulate Matter ($PM_{2.5}$)	55
Nitrogen Oxide (NO_x)	250
Sulfur Oxide (SO_x)	250
Carbon Monoxide (CO)	550

Pollutant	Total Emissions (Pounds/Day)
Lead (Pb) and Lead Compounds2	3.2
Volatile Organic Compounds (VOCs)	55

Source: City of Escondido Municipal Code Section 33-924.

3.2.3 Thresholds of Significance

The State of California has developed guidelines to address the significance of air quality impacts based on Appendix G of the *California Environmental Quality Act (CEQA) Guidelines* which provides guidance that a project would have a significant environmental impact if it would:

- **Threshold #1:** Conflict with or obstruct implementation of the applicable air quality plan;
- **Threshold #2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard;
- **Threshold #3:** Expose sensitive receptors to substantial pollutant concentrations;
- **Threshold #4:** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.2.4 Project Impact Analysis

3.2.4.1 Air Quality Plan Compliance

Threshold #1: Conflict with or obstruct implementation of the applicable air quality plan.

As part of the RAQS and SIP planning process, the SDAPCD develops an emission inventory, based on growth projections from SANDAG and existing emissions figures within the SDAB. The SDAPCD then uses the emission inventory to conduct modeling to demonstrate that the SDAB will attain and maintain the state and federal O_3 standards. This inventory could be thought of as an "emissions budget" for the SDAB, accounting for current emissions as well as previously approved projects consistent with current General Plan policies.

Projects that are consistent with the currently adopted General Plan are determined to be consistent with SDAB's air quality plans, including the RAQS and the SIP. If a project proposes development that is consistent with or less than estimates provided in the General Plan, the project would not conflict with or obstruct implementation of the RAQS or SIP.

The proposed project seeks to be annexed into the City of Escondido from the County of San Diego. Under the County's General plan, the project site has a zoning density of R24 or 24 dwelling units per acre (du/ac). The project applicant is seeking an Urban 3 General Plan land use designation that allows up to 18 du/ac but the proposed density for the site would be 13.2 DU/ac. Since SANDAG regional growth projections are based on zoning classifications of R24 within the County, a reduction from 24 to 18 units per acre would decrease projected growth within the region. Given this, the proposed 13.2 du/ac would be less intense than its current General Plan designation. The project is therefore considered consistent with the County's RAQS and would comply with the state's SIP. Impacts would be **less than significant.**

3.2.4.2 Criteria Pollutants

Threshold #2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

Air quality impacts associated with the proposed project would likely come from two potential sources. The first is related to project construction, such as impacts related to construction equipment emissions, grading activities, and haul trucks for soils import. The second is operational from mobile source emissions from vehicles traveling to and from the proposed project as well as natural gas emission sources (typically due to use of water heaters, kitchen stoves, and central heating units). The analyses and findings for these two impact areas are presented below.

Construction Emissions Analysis

Construction activities are a source of fugitive dust emissions that may have a temporary, but substantial, impact on local air quality. These emissions are generally associated with grading, heavy equipment usage, and from construction worker commutes. Dust emissions and impacts vary with the level of activity, specific operations conducted, and prevailing winds. For the proposed project, rough grading activities assume demolition, site preparation, grading, paving, building construction and architectural coating. The project would utilize Tier 4 or better construction equipment, which include diesel particulate filters, as required by current regulations and as a condition of project approval.

Project construction dates were estimated based on a construction start date in 2023 with construction ending in 2025. As part of construction, the project would demolish existing structures onsite which would be approximately 10,000 SF. After demolition of the existing structures, the entire project site would be graded to prepare the site for infrastructure and building pads. Grading activities are expected to take three to four months. Grading activities would include 17,700 cubic yards (c.y.) of cut and 39,800 c.y. of fill, with a net import of 22,100 c.y. The maximum cut depth would be 15 feet in the northwestern portion of the site and the maximum fill depth would be 10 feet in the west central portion of the site. Soils import is expected to take three weeks. Assuming a 15 c.y. haul truck, this equates to approximately 100 trucks per day.

Blasting may be required in certain areas during construction due to the presence of granitic bedrock. Although the precise amount of blasting required is unknown at this time, if all granitic areas needed blasting, up to 6,812 c.y. of material would be subject to blasting. Following blasting, rock crushing of blasted materials would be needed. No rock crushing would occur on the site. Blasted materials would be transported to the Rosemary's Mountain Quarry in Fallbrook, approximately 15 miles north of the project site. The export of blasted materials is expected to take one week. Assuming a 15 c.y. haul truck, this equates to approximately 91 trucks per day.

During blasting operations, grading operations would stop and it is expected that each blast operation would require between 10,000 - 12,000 pounds (lbs) of ammonium nitrate. The proposed project would utilize approximately 6 tons of ammonium nitrate per a blast which would generate up to 402 lbs (67 lbs/ton X 6 tons) of carbon monoxide and up to 102 lbs (17 lbs/ton X 6 tons) of nitrogen oxides during a blast utilizing 6 tons of ammonium nitrate. These quantities would be additive to the mass grading operations for the entire project site and could be added to the worst-case mass grading daily CO and NO_x output. Given this, it is estimated that each blast would generate 20.59 lb/blast. Detailed calculations are included in the air quality report (LDN 2002a) which is included as Appendix C of the EIR.

The California Emissions Estimator Model (CalEEMod) was utilized for all construction calculations and has been manually updated to reflect SDAPCD Rule 67 VOC paint standards and to include Tier 4 construction equipment. CalEEMod automatically includes haul trips based on the total quantities of demolition and soil inputs and is included in this analysis. CalEEMod uses methodologies presented in the US EPA AP-42 document with emphasis on Chapter 11.9 (USEPA 1995).

The AERSCREEN dispersion model was used to determine the concentration for air pollutants at any location near the pollutant generator. Additionally, the model predicts the maximum exposure distance and concentrations.

Table 3.2-5 presents construction-related emission calculations.

Table 3.2-5. Construction Emissions (lbs/day)

Year	VOC	NO_x	CO	SO_2	PM_{10} (Dust)	PM_{10} (Exhaust)	PM_{10} (Total)	$PM_{2.5}$ (Dust)	$PM_{2.5}$ (Exhaust)	$PM_{2.5}$ (Total)
2023	0.75	13.24	32.46	0.09	20.80	0.10	20.84	10.35	0.10	10.39
2024	31.01	3.68	22.70	0.04	1.28	0.02	1.30	0.34	0.02	0.36
2025	30.99	3.64	22.51	0.04	1.28	0.02	1.30	0.34	0.02	0.36
Blasting Emissions		102	402		20.59		20.59			
Construction Total w/ Blasting (Maximum)	31.01	115.24	434.46	0.09	41.39	0.10	41.43	10.35	0.10	10.39
Significance Threshold	75	250	550	250	-	-	100	-	-	55
Exceed Threshold?	No	No	No	No	-	-	No	-	-	No

Source: LDN Consulting 2022a.

As shown in Table 3.2-5, construction-related emissions would not exceed the City's air quality standards during construction. Therefore, construction-related air emissions would not violate any air quality standards and impacts would be **less than significant**.

Operational Emissions Analysis

Daily project operations would generate emissions from sources such as area, energy, mobile, waste and water use. Area sources include consumer products, landscaping and architectural coatings as part of regular maintenance. Energy sources would be from such uses such as electrical and onsite natural gas use. Operational emissions were calculated using the CalEEMod model for both summer and winter scenarios. The traffic inputs for CalEEMod were adjusted to be consistent with the proposed project traffic study. Based on that study, the proposed project would generate 816 net average daily trips (LOS Engineering 2022). The project traffic trip distances are based on EMission FACtor (EMFAC),

a model that estimates the official emissions inventories of on-road mobile sources in California for the San Diego County region. The CalEEMod model also estimates emission predictions for criteria pollutants for area source assumptions. Additionally, it was assumed that an average of 10% of the structural surface area will be re-painted each year. Finally, since the project would not be installing hearth options, CalEEMod default hearth settings were modified to represent no hearth options.

The following project design features have also been included in the operational analysis:

- Install low flow water fixtures in all units
- Design all indoor and outdoor lights to use LED technology
- Provide separate waste containers to allow for simpler material separations or pay for a waste collection service that recycles the materials in accordance with AB 341 to achiever a 75% waste diversion. All green waste will be diverted from landfills and recycled as mulch.
- No hearth options
- Utilize ENERGY STAR qualified appliances
- Utilize Tier 4 construction equipment with diesel particulate filters (DPF) attached or equivalent
- Plant 102 trees to sequester carbon dioxide
- Install 2kW of solar per unit or roughly 204 kW of solar in total at the project site
- Install electric heat pump water heaters in all units

Consumer product emissions are generated by a wide range of product categories, including air fresheners, automotive products, household cleaners, and personal care products. Emissions associated with these products primarily depend on the increased population associated with residential development. Default emission factors were utilized within the CalEEMod.

Table 3.2-6 summarizes project-related operational emissions, including vehicular and fixed-source emissions. As shown, total operational emissions of the project would be below the City's significance thresholds for all criteria pollutants in both summer and winter. Therefore, operation-related emissions would not violate any air quality standard and would be **less than significant**.

Table 3.2-6. Operational Emissions (lbs/day)

	VOC	NO_x	CO	SOx	PM10	$PM_{2.5}$
Summer Scenario						
Area Source	3.36	0.10	8.41	0.00	0.05	0.05
Energy Use	0.03	0.28	0.12	0.00	0.02	0.02
Mobile Emissions	1.49	1.27	13.12	0.03	3.83	1.03
Total (Lb/Day)	**4.89**	**1.65**	**21.65**	**0.03**	**3.90**	**1.10**
Significance Threshold	55	250	550	250	100	55
Above threshold?	No	No	No	No	No	No

	VOC	NO_x	CO	SOx	PM10	$PM_{2.5}$
Winter Scenario						
Area Source	3.36	0.10	8.41	0.00	0.05	0.05
Energy Use	0.03	0.28	0.12	0.00	0.02	0.02
Mobile Emissions	1.44	1.38	13.66	0.03	3.83	1.03
Total (Lb/Day)	**4.83**	**1.76**	**22.19**	**0.03**	**3.90**	**1.10**
Significance Threshold	55	250	550	250	100	55
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LDN Consulting 2022a.

3.2.4.3 Sensitive Receptors

Threshold #3: Expose sensitive receptors to substantial pollutant concentrations

Sensitive receptors are defined as schools, hospitals, resident care facilities, or day-care centers, as well as residential receptors in the project vicinity. Sensitive receptors in the project area include the single-family residential units north and west of Robin Hill Lane, single-family residential units south of the site, and Meadowbrook Village care facility (a mix of semi-independent and congregate care units) and single-family residential units east of North Iris Lane. The threshold related to sensitive receptors addresses whether the project could expose sensitive receptors to substantial pollutant concentrations of criteria pollutants or TACs.

Construction-Related Fugitive Dust Emissions

Construction activities are a source of fugitive dust (PM_{10} and $PM_{2.5}$) emissions that may have a substantial, although temporary, impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the immediate vicinity of the proposed construction activities. Fugitive dust emissions from the proposed project would be created during onsite earth moving activities. The anticipated onsite worst-case PM_{10} emissions for each phase of construction have been provided above in Table 3.2-5 and are below the significance thresholds.

Construction activities associated with the proposed project would be required to implement emissions control measures detailed in SDAPCD's Rule 55 – Fugitive Dust Control, which restricts construction activities from creating visible dust emissions at the property line that lasts more than three minutes in any hour and requires the removal of all track-out from the nearby roadways. With implementation of SDAPCD's Rule 55, the proposed project would not exceed the SDAPCD standards for fugitive dust. Local air quality impacts would be **less than significant** for construction activities.

Toxic Air Contaminants

Per SDAPCD Rule 1200, if a project has the potential to result in emissions of any TAC that results in a cancer risk of greater than 10 in 1 million or a substantial non-cancer risk, the project would be deemed to have a potentially significant impact. The risk-driving toxic air contaminant that would be emitted as a result of implementation of the proposed project would be diesel particulate matter (DPM)

during construction. Residential projects would not be expected to generate more than a nominal number of diesel truck trips; therefore, no significant TAC impacts would be expected to occur during on-going operations of the proposed project.

To address the potential for construction-related TAC emissions to result in exposure of sensitive receptors to substantial pollutant concentrations, a screening health risk assessment was conducted for construction emissions (LDN 2022a).

Risks were calculated based on the Office of Environmental Health Hazards Assessment update guidance (OEHHA 2015). Cancer risk is calculated by multiplying the daily inhalation or oral dose, by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home, and the exposure duration divided by averaging time, to yield the excess cancer risk. Based upon the air quality modeling, worst-case onsite PM_{10} from onsite construction exhaust would cumulatively produce 0.00092 tons over the construction duration (300 calendar days) or an average of 0.000097 grams/second.

Based on the AERSCREEN dispersion model, the maximum 1-hr concentration is 0.23 µg/m3 during the worst-case construction period. The annual concentration is 0.011 µg/m^3. Therefore, the worst-case inhalation cancer risk is 3.96 at the point of maximum exposure 125 meters (410 feet) away. Since the risk is greater than one, the project would be required to incorporate T-BACT equipment. As a condition of project approval, the project would be required to utilize Tier 4 diesel equipment with diesel particulate filters, which meets the requirement for incorporation of T-BACT equipment. Since the threshold is 10 per million exposed with T-BACT installed, the project would have a **less than significant impact** related to cancer risk and would be in compliance with the City's thresholds.

There are known acute and chronic health risks associated with diesel exhaust which are considered non-cancer risks. Non-cancer risks or risks defined as chronic or acute are also known with respect to DPM and are determined by the hazard index. To calculate hazard index, DPM concentration is divided by its chronic Reference Exposure Levels (REL). Where the total equals or exceeds one, a health hazard is presumed to exist. RELs are published by the Office of Environmental Health Hazard Assessment (OEHHA 2015). Diesel exhaust has a REL of 5 µg/m3 and targets the respiratory system.

Using this methodology, the hourly concentration of 0.23 µg/m3 divided by the REL of 5 µg/m3 yields a Health Hazard Index of 0.046. Since this is less than one, no non-cancer risks are expected and all health risks are considered **less than significant.**

Carbon Monoxide (CO) Hotspot Analysis

Air quality emissions from the operation of the proposed project, including project generated traffic would not exceed air quality significance thresholds established by the City of Escondido. In addition, the project traffic study indicated that under no scenario (existing, near term or long term) would the project have effects on nearby intersections and segments because the project traffic does not exceed the City's LOS D thresholds (LOS Engineering 2022). Given this the project would not have a potential to increase Carbon Monoxide (CO) hot spots at any of the nearby intersections or roadway segments.

3.2.4.4 Other Emissions such as Odors

Threshold #4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use which would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of offsite receptors. The impacts associated with construction and operation of the project were evaluated for significance based on the aforementioned significance criteria.

Construction

Construction activities associated with development of the project site could generate trace amounts of substances such as ammonia, carbon dioxide, hydrogen sulfide, methane, dust, organic dust and endotoxins. Any generation of odors related to these substances would occur intermittently during construction. Construction activities may also generate odors associated with diesel equipment at various locations. Odors would be strongest at the source and would quickly dissipate. The short term and intermittent duration of any odor emissions would ensure construction-related impacts are **less than significant**.

Operation

Future development on the project site includes multi-family residences. This type of use is not typically characterized as one that would generate odors, compared to uses such as industrial and manufacturing. Therefore, odor-related impacts from future uses on the project site are determined to be **less than significant**.

3.2.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to air quality, the cumulative analysis is primarily based upon a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document air quality.

As part of the RAQS and SIP planning process, the SDAPCD develops an emission inventory, based on growth projections from SANDAG and existing emissions figures within the SDAB. The SDAPCD then uses the emission inventory to conduct modeling to demonstrate that the SDAB will attain and maintain the state and federal O_3 standards. This inventory could be thought of as an "emissions budget" for the SDAB, accounting for current emissions as well as previously approved projects consistent with current General Plan policies.

Projects that are consistent with the currently adopted General Plan are determined to be consistent with SDAB's air quality plans, including the RAQS and the SIP. If a project proposes development that

is consistent with or less than estimates provided in the General Plan, the project would not conflict with or obstruct implementation of the RAQS or SIP. Provided a project's emissions are consistent with the projections within the RAQS and SIP, the project would not result in a cumulatively considerable impact on O_3 within the SDAB.

The proposed project seeks to be annexed into the City of Escondido from the County of San Diego. Under the County's General plan, the project site has a zoning density of R24 or 24 dwelling units per acre (du/ac). The project applicant is seeking an Urban 3 General Plan land use designation that allows up to 18 du/ac but the proposed density for the site would be 13.2 DU/ac. Since SANDAG regional growth projections are based on zoning classifications of R24 within the County, a reduction from 24 to 18 units per acre would decrease projected growth within the region. Given this, the proposed 13.2 du/ac would be less intense than its current General Plan designation. The project is therefore considered consistent with the County's RAQS and would comply with the state's SIP. Furthermore, three cumulative projects occur within the immediate area of the project site, including:

1. Escondido Country Club – The Villages. A mixed-use project with 392 single family homes, recreational amenities, and an urban farm generally located north of El Norte Parkway, west of I-15, along on both side of Country Club Lane. (Approximately 0.90 miles northwest of the project site).

2. Nutmeg Residences (137 townhomes and 97 single family homes) generally located on the southwest corner of Centre City Pkwy at Nutmeg St. (Approximately 1 mile northwest of the project site).

3. Assisted Living Residences (96 bed residential care facility) generally located on the east side of Centre City Pkwy south of Iris Lane. (Approximately 0.40 mile south of the project site).

Since the project health risk screening model predicted that diesel exhaust during construction would produce the highest concentrations roughly 125 meters from the project centroid and would generate a cancer risk of 1.88 per one million exposed, cumulative contributions from any nearby cumulative projects would not likely influence air quality emissions dispersed locally. Also, a radius drawn twice the distance from the point of maximum exposure, as shown in **Figure 3.2-1**, would not overlap any of the nearby cumulative projects. Given this, the cumulative projects would not likely increase air quality emissions to cause air quality impacts.

In summary, cumulative impacts would be **less than significant.**

3.2.6 Mitigation Measures

Based upon the analysis presented in Sections 3.2.4 and 3.2.5, project and cumulative air quality impacts would be less than significant. Therefore, no mitigation measures are necessary.

3.2.7 Conclusion

Air Quality Plan Compliance

Projects that are consistent with the currently adopted General Plan are determined to be consistent with SDAB's air quality plans, including the RAQS and the SIP. If a project proposes development that is consistent with or less than estimates provided in the General Plan, the project would not conflict with or obstruct implementation of the RAQS or SIP.

The proposed project seeks to be annexed into the City of Escondido from the County of San Diego. Under the County's General plan, the project site has a zoning density of R24 or 24 dwelling units per acre (du/ac). The project applicant is seeking an Urban 3 General Plan land use designation that allows up to 18 du/ac but the proposed density for the site would be 13.2 DU/ac. Since SANDAG regional growth projections are based on zoning classifications of R24 within the County, a reduction from 24 to 18 units per acre would decrease projected growth within the region. Given this, the proposed 13.2 du/ac would be less intense than its current General Plan designation. The project is therefore considered consistent with the County's RAQS and would comply with the state's SIP. Impacts would be **less than significant.**

Criteria Pollutants

Air quality impacts associated with the proposed project would likely come from two potential sources. The first is related to project construction, such as impacts related to construction equipment emissions, grading activities, and haul trucks for soils import. The second is operational from mobile source emissions from vehicles traveling to and from the proposed project as well as natural gas emission sources (typically due to use of water heaters, kitchen stoves, and central heating units).

Construction activities are a source of fugitive dust emissions that may have a temporary, but substantial, impact on local air quality. These emissions are generally associated with grading, heavy equipment usage, and from construction worker commutes. Dust emissions and impacts vary with the level of activity, specific operations conducted, and prevailing winds. For the proposed project, rough grading activities assume demolition, site preparation, grading, paving, building construction and architectural coating. The project would utilize Tier 4 or better construction equipment, which include diesel particulate filters, as required by current regulations and as a condition of project approval. As shown in Table 3.2-5, construction-related emissions would not exceed the City's air quality standards during construction. Therefore, construction-related air emissions would not violate any air quality standard and impacts would be **less than significant**.

Daily project operations would generate emissions from sources such as area, energy, mobile, waste and water use. Area sources include consumer products, landscaping and architectural coatings as part of regular maintenance. As shown in Table 3.2-6, total operational emissions of the project would be below the City's significance thresholds for all criteria pollutants in both summer and winter. Therefore, operation-related emissions would not violate any air quality standard and would be **less than significant**.

Sensitive Receptors

Sensitive receptors in the project area include the single-family residential units north and west of Robin Hill Lane, single-family residential units south of the site, and Meadowbrook Village care facility (a mix of semi-independent and congregate care units) and single-family residential units east of North Iris Lane. The threshold related to sensitive receptors addresses whether the project could expose sensitive receptors to substantial pollutant concentrations of criteria pollutants or TACs.

Fugitive dust (PM_{10} and $PM_{2.5}$) created during onsite earth moving activities may be a nuisance to those living and working in the immediate vicinity of the proposed construction activities. However, the anticipated onsite worst-case PM_{10} emissions for each phase of construction have been provided above in Table 3.2-5 and are below the significance thresholds. Furthermore, construction activities associated with the proposed project would be required to implement emissions control measures detailed in SDAPCD's Rule 55 – Fugitive Dust Control, which restricts construction activities from

creating visible dust emissions at the property line that lasts more than three minutes in any hour and requires the removal of all track-out from the nearby roadways. With implementation of SDAPCD's Rule 55, the proposed project would not exceed the SDAPCD standards for fugitive dust and impacts to sensitive receptors would be **less than significant**.

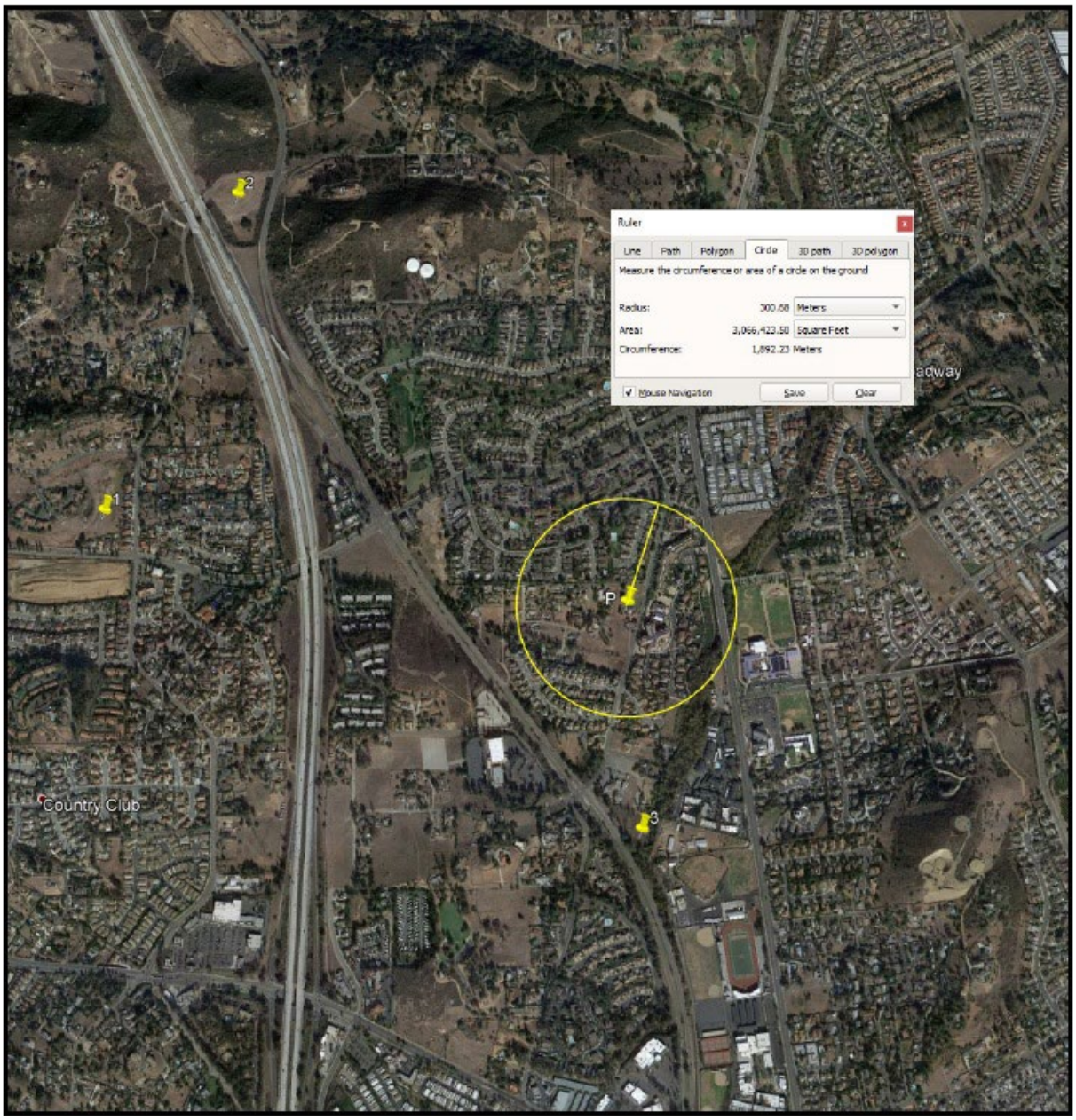
if a project has the potential to result in emissions of any TAC that results in a cancer risk of greater than 10 in 1 million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. The risk-driving toxic air contaminant that would be emitted as a result of implementation of the proposed project would be diesel particulate matter during construction. Residential projects would not be expected to generate more than a nominal number of diesel truck trips; therefore, no significant TAC impacts would be expected to occur during on-going operations of the proposed project. To address the potential for emissions of construction-related TAC emissions to result in exposure of sensitive receptors to substantial pollutant concentrations, a screening health risk assessment was conducted for construction emissions. Per the air quality modeling for toxic air contaminants, implementation of the project would not result in significant cancer or non-cancer risks. Based on the AERSCREEN dispersion model, the inhalation cancer risk is 3.96 at the point of maximum exposure 125 meters (410 feet) away. As a condition of project approval, the project would be required to utilize Tier 4 diesel equipment with diesel particulate filters, which meets the requirement for incorporation of T-BACT equipment. Since the threshold is 10 per million exposed with T-BACT installed, the project would have a **less than significant impact** related to cancer risk and would be in compliance with the City's thresholds.

In addition, non-cancer risks or risks defined as chronic or acute are also known with respect to diesel particulate matter and are determined by the hazard index. Based on the air quality modeling, the project would yield a health hazard index of 0.046. Since this is less than one, no non-cancer risks are expected and all health risks are considered **less than significant.**

Other Emissions Such as Odors

Any generation of odors related to construction activities would be strongest at the source and then quickly dissipate. The short term and intermittent duration of any odor emissions would ensure construction-related impacts are **less than significant**. The proposed land use for the project site is multi-family residential which is not typically characterized as a use that would generate odors, compared to uses such as industrial and manufacturing. Therefore, odor-related impacts from future uses on the project site are determined to be **less than significant**.

Figure 3.2-1. Cumulative Projects



Source: LDN Consulting, 2022a.

3.3 Biological Resources

This section of the Environmental Impact Report (EIR) describes the existing biological resources on the proposed project site and in the vicinity and analyzes the potential for the project to impact biological resources. A Biological Technical Report was prepared by Helix Environmental Planning in April 2022 (Helix 2022) and an Arborist Report was prepared by Lightfoot Planning Group in March 2022 (Lightfoot Planning Group 2022). These reports are included as Appendices D and E of the EIR. The following information is based on these reports and, unless otherwise referenced, the Escondido General Plan Update (City of Escondido 2012b).

3.3.1 Existing Conditions

This section describes the existing conditions related to biological resources on the proposed project site.

The project site is bounded on all sides by residential development. Land uses further south and west of the project site include commercial development.

3.3.1.1 Vegetation Communities

HELIX biologist Amy Mattson conducted a general biological survey of the project study area (i.e., project site and surrounding areas within 150 feet) on August 12, 2020, to map existing vegetation communities, evaluate habitats for the potential to support sensitive species, and note other potentially sensitive biological resources that occur or may occur on-site and in the immediate vicinity. Rare plant surveys were conducted on April 21, 2021 and June 15, 2021 by Ms. Mattson. Oak trees were also mapped during the June 2021 site visit. Vegetation communities were classified and mapped in accordance with Holland (1986) and Oberbauer (1996). Vegetation was mapped on a 150-foot (1 inch = 150 feet) aerial photograph of the project site with an overlay of the study area boundary and were mapped to one-tenth of an acre (0.1 acre) for uplands and one-hundredth of an acre (0.01 acre) for wetlands.

A total of five vegetation communities or land use types occur within the project site: disturbed wetland, non-native grassland, non-native vegetation, disturbed habitat, and urban/developed land (**Table 3.3-1** and **Figure 3.3-1**).

Sensitive vegetation communities/habitat types are defined as land areas that support unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants as defined by Section 15380 of the State CEQA Guidelines. The rarity of natural communities is evaluated by CDFW using the NatureServe's Heritage Methodology in which communities are given a G (global) and S (State) rank based on their degree of imperilment (as measured by rarity, trends, and threats). Communities are assigned an overall rank of 1 through 5, with 1 being considered very rare and threatened and 5 being considered demonstrably secure. Communities with a Rarity Ranking of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable) are considered sensitive by the CDFW. Two sensitive vegetation communities/habitat types were mapped within the project site: disturbed wetland and non-native grassland. Three additional habitats, non-native vegetation, disturbed habitat, and developed lands do not meet the definition of sensitive habitat under CEQA.

Table 3.3-1. Existing Vegetation Communities and Land Covers Within the Project Site

Vegetation Community/Land Cover Types(1)	Acres(2)
Sensitive	
Disturbed Wetland	0.1
Non-native Grassland	2.5
Subtotal Sensitive Communities	2.6
Non-Sensitive	
Non-native Vegetation	0.1
Disturbed Habitat	0.9
Urban/Developed Land	3.9
Subtotal Non-Sensitive Communities	4.9
TOTAL	**7.5**

Source: Helix 2022.

Notes: (1) Vegetation Categories are from Holland (1986) and Oberbauer (2008) and are listed by Habitats and Tiers within the MHCP.
(2) Upland habitats are rounded to the nearest 0.1 acre, while wetland habitats are rounded to the nearest 0.1 acre; thus totals reflect rounding.

Disturbed Wetland

Disturbed wetland occupies approximately 0.1 acre of the project site. This vegetation community is dominated by exotic wetland species that invade areas that have been previously disturbed or undergone periodic disturbances. These non-natives become established more readily following natural or human-induced habitat disturbance than the native wetland flora. Characteristic species of disturbed wetlands include giant reed (*Arundo donax),* ox tongue (*Helminthotheca echioides*), cocklebur (*Xanthium strumarium var. canadense*), and tamarisk (*Tamarix sp.*). Dominant species in this vegetation community within the project site include curly dock (Rumex crispus), dallisgrass (*Paspalum dilatatum*), tall flatsedge (*Cyperus eragrostis*), annual beard grass (*Polypogon monspeliensis*), and fat-hen (*Atriplex prostrata*). Disturbed wetland on-site is associated with a channelized drainage traversing the southern portion of the project site from west to east.

Non-Native Grassland

Non-native grassland occupies approximately 2.5 acres of the project site. Non-native grassland is a dense to sparse cover of annual grasses, often associated with numerous species of showy-flowered native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include oats (*Avena sp.*), red brome (*Bromus rubens*), ripgut (*B. diandrus*), ryegrass (*Lolium sp.*), and mustard (*Brassica sp.*). Dominant species in this vegetation community within the project site include Bermuda grass and English plantain.

Non-Native Vegetation

Non-native vegetation is a category describing stands of naturalized trees and shrubs (e.g., acacia [*Acacia sp.*], pepper tree [*Schinus* sp.]), many of which are also used in landscaping. Dominant species in this vegetation community within the project site include Peruvian pepper tree (*Schinus molle*) with an understory of oats. Non-native Vegetation occupies approximately 0.1 acre of the project site.

Disturbed Habitat

Disturbed habitat occupies approximately 0.9 acre of the project site. Disturbed habitat includes land cleared of vegetation, land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes any capability of providing viable habitat. Disturbed habitat resembles the non-native grassland on-site but contains less non-native grass, has a higher predominance of bare ground, and/or disturbance-related plant species. Dominant species in this plant community within the project site include Bermuda grass (*Cynodon dactylon*), tarplant (*Deinandra fasciculata*), dove weed (*Croton setigerus*), and horseweed (*Erigeron canadensis*). Disturbed habitat is distributed throughout the project site.

Urban/ Developed Lands

Urban/developed land occupies approximately 3.9 acres of the project site. Developed land is where permanent structures and/or pavement have been placed, which prevents the growth of vegetation, where landscaping is clearly tended and maintained, and land experiencing heavy usage. Within the project site, urban/developed land consists of roads, residential housing, landscaping, ornamental plantings, and a horse corral. Landscaping associated with developed land also includes areas planted with coast live oak trees.

Coast Live Oak Woodland

Within the project site, coast live oak trees occur as a cluster of oak trees at/adjacent to 2039 North Iris Lane and scattered individuals. This cluster of oak trees occurs on historic aerial imagery only after construction of the residence in 1959 (NETROnline 2021; Zillow 2021). This area does not include typical understory species associated with coast live oak woodland habitat. Because the oak trees appear to have been installed as landscaping and do not function as coast live oak woodland, these areas have been categorized as developed land. The row of coast live oak trees along Robin Hill Lane, which overhang the western side of the property at 2039 North Iris Lane, also occurs on historic imagery after residential construction and does not include understory species associated with coast live oak woodland habitat. There are coast live oak trees on a narrow strip of land associated with a Vallecitos Water District (VWD) easement to the south of the project site, between the project site and a wooden fence bordering houses built along Cheyenne Lane. These oak trees overhang the southern edge of the project site. These trees appear on historic aerial imagery after 1985 when grading occurred for residential development (Google Earth 2021) and do not include understory species associated with coast live oak woodland habitat. Because oak trees overhanging the project site (on both the southern and western edges) appear to be associated with residential development and these areas do not function as coast live oak woodland, these areas have been categorized as developed land.

3.3.1.2 Jurisdictional Waters

A formal jurisdictional delineation was conducted by HELIX biologists Jason Kurnow and Stacy Nigro on August 24, 2020. Areas on-site considered to be potentially jurisdictional were preliminarily delineated based on the presence of bed and bank features, ordinary high-water mark, drainage patterns, and riparian and wetland habitat types. The biologists identified and mapped jurisdictional aquatic resources potentially subject to U.S. Army Corps of Engineers (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA), Regional Water Quality Control Board (RWQCB) jurisdiction pursuant to Section 401 of the Clean Water Act and State Porter-Cologne Water Quality Control Act, and streambed and riparian habitat potentially subject to CDFW jurisdiction pursuant to Sections 1600 et seq. of the California Fish and Game Code (CFGC). Jurisdictional aquatic resources were identified and mapped based on vegetation communities and hydrologic characteristics, in accordance with current guidelines.

Results of the delineation concluded there are potentially jurisdictional resource types on-site. A summary of the acreages is provided below in **Table 3.3-2** and **Table 3.3-3** and presented on **Figure 3.3-2, Figure 3.3-3,** and **Figure 3.3-4**.

USACE and RWQCB Jurisdiction

Potential USACE-jurisdictional waters of the U.S. were generally determined based on the presence of ponded water, a discernible ordinary high-water mark (OHWM), and/or wetland conditions expressed by three parameters (vegetation, hydrology, and soils) established for wetland delineations, as described within the Wetlands Delineation Manual (Environmental Laboratory 1987) and Arid West Regional Supplement (USACE 2008). The OHWM was identified according to "A Field Guide to the Identification of the Ordinary High-Water Mark in the Arid West Region of the Western United States" (Lichvar and McColley 2008). Mapping of drainage features was performed in the field based on the OHWM and surface indications of hydrology. No soil pits were dug as hydrology and aquatic vegetation extents were evident. Areas were determined to be potential wetland waters of the U.S. if there was a dominance of hydrophytic vegetation, hydric soils, and wetland hydrology indicators. Areas were determined to be non-wetland waters of the U.S. if there was evidence of regular surface flow within an OHWM, but the vegetation criterion was not met. Hydric soils were presumed present aquatic vegetation was mapped.

Potential RWQCB-jurisdictional areas were delineated in the same manner as potential waters of the U.S. All waters of the U.S. were considered waters of the State subject to RWQCB jurisdiction pursuant to CWA Section 401. Ephemeral features, while not considered waters of the U.S., were determined to be waters of the State under regulatory jurisdiction of the RWQCB pursuant to the State Porter-Cologne Water Quality Control Act.

USACE and RWQCB jurisdictional areas identified within the project site are associated with the unnamed drainage located adjacent to the existing horse stables, including 0.05 acre and 494 linear feet of non-wetland waters of the United States (Figure 3.3-2, Figure 3.3-3; and Table 3.3-2,). The project site does not contain wetland waters of the United States/State.

Table 3.3-2. Waters of the United States Within the Project Site

Habitat	Acreage(1)	Linear Feet
Non-Wetland Waters of the U.S/State		
Streambed	0.05	494
TOTAL	0.05	494

Source: Helix 2022.
Note: (1) Habitat rounded to the nearest 0.1 acre; total reflects rounding

CDFW Jurisdiction

Potential CDFW-jurisdictional streambed and riparian habitat were determined based on the presence of riparian vegetation or regular surface flow within a measurable bed and bank. Streambeds within CDFW jurisdiction were delineated based on the definition of streambed as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that support riparian vegetation" (Title 14, Section 1.72). Potential CDFW-jurisdictional unvegetated streambed encompasses the top-of-bank to top-of-bank width for the features within the project site. Riparian habitat is not defined in Title 14, but the section refers to vegetation and habitat associated with a stream. The CDFW jurisdictional habitat includes all riparian shrub or tree canopy that may extend beyond the banks of a stream.

CDFW jurisdiction areas within the project site are also associated with the unnamed drainage located adjacent to the horse stables and includes 0.10 acre of jurisdictional habitat (disturbed wetland) and 0.02 acre of streambed (Figure 3.3-4 and Table 3.3-3). The portion of the unnamed drainage occurring within jurisdictional habitat is classified as jurisdictional habitat and not streambed since the species composition within the drainage is the same as the adjacent disturbed wetland areas.

Table 3.3-3. CDFW Jurisdiction Within the Project Site

Habitat	Acreage(1)
Disturbed Wetland	0.10
Streambed	0.02
TOTAL	0.12

Source: Helix 2022.
Note: (1) Habitat rounded to the nearest 0.1 acre; total reflects rounding

3.3.1.3 Special-Status Plant and Wildlife Species

Plants

A list of all plant and animal species observed or detected within the project site was prepared. Plant species were identified in the field or later in the laboratory with the aid of voucher specimens. A total of 86 plant species were observed within, or adjacent to, the project study area during the biological surveys for the project, of which 58 (67 percent) are non-native species (Appendix A, Plant Species Observed within Appendix D Biological Technical Report of this EIR).

Special status plant species have been afforded special status and/or recognition by the USFWS and/or CDFW. They may also be included in the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants. Their status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. Sensitive species are those considered unusual or limited in that they are: (1) only found in the region; (2) a local representative of a species or association of species not otherwise found in the region; or (3) severely depleted within their ranges or within the region. No sensitive plant species have been recorded on-site or were observed within the project site during the general biological surveys for the project.

A search of CNPS and CNDDB records (one-mile radius from the project site) was used to develop a matrix of sensitive plant species that may have potential to occur on-site due to the presence of suitable habitat (e.g., vegetation communities, soils, elevation, and geographic range, life form/blooming period, etc.). The matrix is presented in Appendix C, Special Status Plant Species Observed or with Potential to Occur within the Biological Technical Report – Appendix D of this EIR, and includes 24 special status plant species, their favorable habitat conditions, and their potential to occur on-site.

No special status plant species were observed within the project site during general biological surveys occurring in 2020 and rare plant surveys occurring in 2021. No special status plant species were determined to have a high or moderate potential to occur due to the lack of suitable habitat within the project site. None of the 24 special status plant species are expected to occur at the project site.

Wildlife

A total of 14 animal species were observed/detected within, or adjacent to, the project study area during the biological surveys for the project, including three invertebrates, one amphibian, one mammal, and nine bird species (Appendix B, Animal Species Observed or Detected of the Biological Technical Report – Appendix D of this EIR). Animals were identified in the field by direct visual observation with the aid of binoculars or indirectly by detection of calls, tracks, burrows, or scat.

Special status animal species include those that have been afforded special status and/or recognition by the USFWS and/or CDFW. In general, the principal reason an individual taxon (species or subspecies) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. No special status animal species were observed within the project site during the 2020 biological surveys.

A search of CNDDB and USFWS records (one-mile radius from the project site) was used to develop a matrix of sensitive animal species that may have potential to occur on-site due to the presence of suitable habitat (e.g., vegetation communities, soils, elevation, geographic range, etc.). The matrix is presented in Appendix D of the Biological Resources Technical Report – Appendix D of this EIR), and includes eight special status animal species, their favorable habitat conditions, and their potential to occur on-site. No special status animal species were observed within or adjacent to the project. No special status animal species were determined to have a high or moderate potential to occur due to the lack of suitable habitat within the project site. All eight special status animal species have low potential to occur, or are presumed to be absent, are not expected, or have no to occur at the project site.

Nesting Birds

Trees and shrubs both within and adjacent to the project site could provide suitable nesting habitat for bird species, including raptors, known to occur in the region.

3.3.1.4 Wildlife Movement Corridors and Habitat Linkages

Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent

mixing of genes between populations. A corridor is a specific route that is used for the movement and

migration of species and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stone linkages that are made up of a fragmented archipelago arrangement of habitat over a linear distance.

The project site is not located within the Biological Core and Linkage Area (BCLA), the regional area identified as important to the conservation of species within the Draft Escondido Subarea Plan (SAP) of the Multiple Habitat Conservation Program (MHCP). Furthermore, the project site's location within residential development, the highly disturbed nature of the vegetation communities within the project site, and the limited size of resources or sensitive vegetation communities on-site would provide only marginal-quality foraging or breeding habitat for native species. Small terrestrial wildlife species (i.e., birds, mammals, reptiles, etc.) would use the project site. Given the project site location is immediately surrounded by residential development, the project site itself does not serve as a wildlife corridor or habitat linkage for the region.

3.3.2 Regulatory Framework

3.3.2.1 Federal Regulations

Federal Endangered Species Act

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

"harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

Sections 7 and 4(d) of the Federal ESA regulate actions that could jeopardize endangered or threatened species. Section 7, administered by the USFWS, describes a process of Federal interagency consultation for use when Federal actions may adversely affect listed species. A Section 7 Consultation (formal or informal) is required when there is a nexus between a listed species' use of a site and if the project is funded (wholly or in part) by the State Revolving Fund. A biological assessment is required for any major construction activity if it may affect listed species. Take can be authorized via a letter of

Biological Opinion, issued by the USFWS, for non-marine related listed species issues. The project would be funded in part by the State Revolving Fund. A Section 7 Consultation would be required if impacts to a federally listed species would occur.

Identified by the USFWS, critical habitat is defined as areas of land that are considered necessary for endangered or threatened species to recover. The ultimate goal is to restore healthy populations of listed species within their native habitat, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the federal ESA, all federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in the destruction or adverse modification of the critical habitat.

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is used to place restrictions on the disturbance of active bird nests during the nesting season (generally February 15 to August 31, but as early as January 1 for some raptors). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act and Rivers and Harbors Act

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the CWA. The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the United States. Permitting for projects filling waters of the United States is overseen by the USACE under Section 404 of the CWA. Most development projects are permitted using Individual Permit or Nationwide Permit instruments.

3.3.2.2 State Regulations

California Environmental Quality Act

Primary environmental legislation in California is found in CEQA and its implementing guidelines (State CEQA Guidelines), which require that projects with potential adverse effects (i.e., impacts) on the environment undergo environmental review. Adverse environmental impacts are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Department of Fish and Wildlife (CDFW) Comment

As part of the CEQA process, agencies and the public are invited to comment on a proposed project. During the Notice of Preparation process for this EIR, the CDFW provided recommendations for tree removal. CDFW recommended replacing all mature trees removed as a result of the proposed work activities (including non-native trees) with native trees at a minimum 1:1 ratio. This recommendation is intended to prevent habitat loss for native fauna and any resulting loss of biodiversity. To address the loss of trees, the project will comply with the City of Escondido's tree regulations.

CDFW also commented that the project's removal of trees has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high

biological diversity including special status species. The CDFW recommends an infectious tree disease management plan be prepared for the project. The potential for the project to result in the spread of tree insect pest and disease is analyzed in Section 3.3.4, below.

California Endangered Species Act

The California Endangered Species Act (CESA), established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may "take" plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit (ITP) if the CDFW certifies that the incidental take is consistent with CESA (CFG Code Section 2080.1[a]). For state-only listed species, Section 2081 of CFG Code authorizes the CDFW to issue an Incidental Take Permit for state listed threatened and endangered species if specific criteria are met. The MHCP is a regional Natural Communities Conservation Plan that was granted take coverage under Section 2081 of the CESA.

California Department of Fish and Game Code

The California Department of Fish and Game Code provides specific protection and listing for several types of biological resources.

Section 1600 of CFG Code requires a Streambed Alteration Agreement (SAA) for any activity that would alter the flow, change, or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake. Typical activities that require an SAA include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. Notification is required prior to any such activities.

If the project could result in adverse impacts to a state-listed species that is not also federally listed, Section 2081(b) of the California Fish and Game Code provides a mechanism for CDFW to permit, on a project-specific basis, incidental take of species listed under CESA. Preparation and submittal of an ITP application with CDFW by the project proponent is required. The application must include project details, potential project impacts, an analysis of "jeopardy" for the continued existence of the impacted species, and species-specific mitigation and avoidance measures that would fully mitigate for the project impacts.

Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

Natural Communities Conservation Planning Act

The Natural Communities Conservation Planning (NCCP) program is a cooperative effort to protect habitats and species. It began under the state's NCCP Act of 1991, legislation broader in its orientation and objectives than the CESA or FESA. These laws are designed to identify and protect individual species that have already declined significantly in number. The NCCP Act of 1991 and the associated Southern California Coastal Sage Scrub NCCP Process Guidelines (1993), Southern California Coastal Sage Scrub NCCP Conservation Guidelines (1993), and NCCP General Process Guidelines (1998) have been superseded by the NCCP Act of 2003.

The primary objective of the NCCP program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by species' listings by focusing on the long-term stability of wildlife and plant communities and including key interests in the process.

This voluntary program allows the state to enter into planning agreements with landowners, local governments, and other stakeholders to prepare plans that identify the most important areas for a threatened or endangered species, and the areas that may be less important. These NCCP plans may become the basis for a state permit to take threatened and endangered species in exchange for conserving their habitat. The CDFW and USFWS worked to combine the NCCP program with the federal HCP process to provide take permits for state and federal listed species. Under the NCCP, local governments, such as the County, can take the lead in developing these NCCP plans and become the recipients of state and federal take permits.

3.3.2.3 Regional/Local Regulations

Multiple Habitat Conservation Program (MHCP)

The MHCP, adopted by the San Diego Association of Governments (SANDAG) in March 2003, is a comprehensive, multiple-jurisdiction planning program designed to create, manage, and monitor an ecosystem preserve in northwestern San Diego County (MHCP; AMEC 2003). It is one of several large, multiple-jurisdiction habitat planning efforts in the County, each of which constitutes a subregional plan under California's NCCP Act of 1991. The MHCP preserve system is intended to protect viable populations of native plant and animal species and their habitats in perpetuity, while accommodating continued economic development and quality of life for residents of northern San Diego County. The MHCP subregion encompasses the seven incorporated cities of northwestern San Diego County (Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista). These jurisdictions are required to implement their portions of the MHCP through citywide subarea plans, which describe the specific policies each city will institute for the MHCP.

The MHCP replaces the traditional project-by-project approach to gaining approvals with a coordinated, comprehensive program that ensures that project mitigations are directed to those areas most critical to biological conservation, while allowing expedited development of less important habitat areas. MHCP implementation will also include perpetual monitoring and management of the preserve system. In exchange for these conservation actions, participating cities will receive "take authorization" from the USFWS and CDFW. Take authorization allows for otherwise lawful actions that may incidentally harm individuals of a species or its habitat (generally outside of the preserve system) in exchange for conserving the species inside the preserve system. Jurisdictions granted take authorization may share their benefits by using them to permit take by public or private projects that comply with the respective city's subarea plan.

The City of Escondido is the easternmost incorporated city within the MHCP. The draft Escondido MHCP Subarea Plan (Ogden Environmental and Energy Services and Conservation Biology Institute 2001) includes the incorporated city limits plus approximately 3,000 acres owned by the City in the unincorporated areas surrounding Lake Wohlford, Valley Center Road, and isolated parcels with existing or planned utility improvements. The Subarea Plan boundary abuts the approved South County MSCP preserve area and the North County. MSCP planning area within the unincorporated areas. The Subarea Plan currently encompasses an area of approximately 24,624 acres. The MHCP identifies 47 species (32 animals and 15 plants) that occur or potentially occur in Escondido and therefore are evaluated for coverage in the Subarea Plan. The plan addresses the potential impacts on natural habitats and potential species endangerment due to projects within the city. The plan also institutes a strategy to proactively mitigate these impacts on the city's biological resources. Approval and adoption of the Subarea Plan would result in federal and state authorization for incidental take of sensitive species caused by implementation of public and private projects within the city. The intent of the draft Escondido MHCP Subarea Plan is to provide regulatory certainty to landowners within the city and aid in conserving the region's biodiversity and enhancing the overall quality of life for residents. At full implementation, the draft Escondido MHCP Subarea Plan would conserve a total of 6,570 acres of natural habitats within the proposed preserve area. An additional 332 acres of wetlands and 39 acres of natural habitat constrained by steep slopes would be expected to remain undeveloped outside the preserve area. The preserve is designed to protect important portions of sensitive vegetation communities, including 65% of the coastal sage scrub and 100% of wetlands in the Escondido subarea.

The project site is not located within a Pre-Approved Mitigation Area (PAMA) targeted for conservation by the MHCP. Within the Draft Escondido SAP, the project site is not mapped as a Focused Planning Area (FPA), not designated as Constrained Lands outside the FPA and not located within the biological core and linkage area (BCLA). At this time, the City is not moving forward with the draft Escondido MHCP Subarea Plan; thus, there is no take coverage afforded under the draft Escondido MHCP Subarea Plan or the MHCP.

City of Escondido General Plan

The General Plan includes the Resource Conservation Element. This element includes a number of goals and policies that address historic, cultural, and Tribal resources. Applicable goals and policies related to the proposed project are listed below. Refer to Section 3.10, Land Use and Planning for an analysis of proposed project consistency with City General Plan Resource Conservation Element goals and policies.

Biological and Open Space Resources Goal 1: Preservation and enhancement of Escondido's open spaces and significant biological resources as components of a sustainable community.

Biological and Open Space Resources Policy 1.6: Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, require mitigation of resources either on- or off-site at ratios consistent with State and federal regulations, and in coordination with those agencies having jurisdiction over such resources.

Biological and Open Space Resources Policy 1.7: Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare

and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.

Biological and Open Space Resources Policy 1.8: Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.

Biological and Open Space Resources Policy 1.9: Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.

Biological and Open Space Resources Policy 1.10: Prohibit any activities in riparian areas other than those permitted by appropriate agencies to protect those resources

Biological and Open Space Resources Policy 1.11: Construct appropriate barriers to be maintained by property owners or homeowners' associations that restrict access to areas containing sensitive biological resources.

Biological and Open Space Resources Policy 1.12: Promote the use of native plants for public and private landscaping purposes within the city.

City of Escondido Municipal Code – Vegetation and Tree Removal

The City establishes regulations and standards for the preservation, protection, and selected removal of vegetation, including mature and protected trees. A City-issued vegetation removal permit or a grading permit is required prior to clearing, pruning, or destroying vegetation and prior to any encroachments by construction activities that disturb the root system within the dripline (e.g., the outer extent margin of a tree's canopy) of any mature and protected trees. Issuance of a vegetation removal permit requires the submittal of a tree survey and, as applicable, a tree protection and/or replacement mitigation plan. Issuance of a grading plan would also require location and identification of any existing sensitive biological habitat, mature trees, and protected trees. The grading permit would state any required mitigation for loss of these resources. Tree protection, removal, and replacement standards are outlined in the City's General Plan and in Chapter 33 (Zoning), Article 55 (Grading and Erosion Control) of the City's Municipal Code (Ordinance 2001-21). The City's General Plan recognizes any oak tree species and other mature trees, as defined below, as significant aesthetic and ecological resources deserving protection within the boundaries of the City. Section 33-1052 and 33-1068 of the City's Municipal Code sets forth rules and standards related to mature tree removal, protection, and replacement.

Section 33-1502 (Definitions): A mature tree is any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of multiple stems of any mature oak tree (*genus Quercus*), shall have a diameter four inches or greater when measured at 4.5 feet diameter at breast height (DBH) above the tree's natural grade. All other mature trees shall have a DBH of eight inches, or greater, for a single stem or one of the multiple stems.

A protected tree is any oak that has a 10 inch or greater DBH, or any other tree species or individual specimen listed on the historic register or determined to substantially contribute to the historic

character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code.

Section 33-1068 (Vegetation Clearing and Protection): Pursuant to this section regulations and standards are established to safeguard life and property and the public welfare concerning the preservation, protection, and selected removal of mature trees, protected trees, and historically significant trees which are located within the boundaries of the City.

A vegetation removal permit (or grading permit) and appropriate standards for the replacement of vegetation approved for removal is required prior to clearing, pruning, or destroying City regulated vegetation, and prior to any encroachments by construction activities that destroy or disturb the root system within the dripline of regulated trees. Issuance of a vegetation removal permit requires the submittal of a tree survey and if possible, a tree replacement and/or protection plan.

Section 33-1069 (Vegetation Protection and Replacement): Pursuant to this section, every feasible effort shall be made to preserve sensitive habitat, sensitive species, mature trees, and protected trees in-place. Removal of sensitive biological habitat and sensitive species shall be mitigated either on-site or off-site by the planting of the same habitat species at a minimum 1:1 ratio. Higher replacement ratios, or different plant species, may be required by the director for conformance with other federal, state, or local codes and agreements in effect at the time of the review of the application. If replacement of sensitive biological species and/or habitat is not feasible on-site or off-site, other equivalent mitigation measures may be considered by the director. If mature trees cannot be preserved on-site, they shall be replaced at a minimum ratio of one to one (1:1). If protected trees cannot be preserved on-site, they shall be replaced at a minimum ratio of two to one (2:1). However, the number, size, and species of replacement trees can be determined on a case-by-case basis by the City's Director of Planning and Building.

3.3.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 California Code of Regulations 15000 et seq.) has identified significance criteria to be considered for determining whether a project could have significant impacts on existing biological resources.

An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences:

- **Threshold 1:** 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 CDFW or USFWS.
- **Threshold 2:** Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.
- **Threshold 3:** Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.
- **Threshold 4:** 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.

- **Threshold 5:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- **Threshold 6:** Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

3.3.4 Project Impact Analysis

This section describes potential direct and indirect impacts on biological resources associated with the proposed project. Direct impacts immediately alter the affected biological resources such that those resources are eliminated temporarily or permanently. Indirect impacts can be short-term or long-term and incorporate areas adjacent to the project (i.e., edge effects). Examples of short-term indirect impacts include construction-related noises, dust, increased human presence, and hydrology modifications. Long-term indirect impacts primarily result from anthropogenic disturbances by humans such as noise, lighting, domesticated animals, spread of non-native ornamental and weedy plant species, and urban run-off (including potentially toxic or hazardous contaminants). The magnitude of an indirect impact can be the same as a direct impact; however, the effect usually takes a longer time to become apparent.

Candidate, Sensitive, or Special-Status Species

Threshold 1: 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.

Direct and Indirect Impacts – Special - Status Plants Species

No special-status plant species were documented during general biological surveys (2020) or during focused rare plant surveys (2021) (Helix 2022). Additionally, no sensitive plant species have a moderate or high potential to occur on the project site. As such, no direct or indirect impacts on special-status plant species would occur with project implementation.

Direct and Indirect Impacts - Special - Status Animal Species

No special-status animal species were documented during project biological surveys (Helix 2022). Additionally, no special-status animal species have a moderate or high potential to occur on the project site. As such, no direct or indirect impacts on special-status animal species would occur with project implementation. However, there is potential for general bird species or raptor species to nest within suitable habitat on the project site. Impacts to general nesting birds or raptors are discussed below.

Direct and Indirect Impacts - Nesting Birds

Trees and shrubs both within and adjacent to the project site could provide suitable nesting habitat for bird species, including raptors, known to occur in the region. Therefore, there is potential for general bird species or raptor species to nest within suitable habitat on the project site. The project site has the potential to impact active bird nests if vegetation is removed or ground disturbing activities occur during the nesting season, which generally runs from February 15 to August 31 (as early as January 1 for some raptors) to the extent feasible. Impacts on nesting birds are prohibited by the MBTA and CFGC. Clearing, grubbing and construction activities, if conducted during the breeding season, could

directly or indirectly impact species protected under the MBTA. This represents a **significant impact** (**Impact BIO-1**) and mitigation is required.

- **Impact BIO-1:** Potential to impact avian species protected under the Migratory Bird Treaty Act if tree removal, vegetation removal, or other construction activities occur during the nesting season.

3.3.4.1 Sensitive Habitats

Threshold 2: 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 the U.S. Fish and Wildlife Service.

Direct Impacts – Sensitive Habitats

The project would result in impacts to five habitats or land cover types. **Table 3.3-4** summarizes the impacts by vegetation community/land cover type and **Figure 3.3-5** presents the impacts. The project will result in direct and permanent impact to three non-sensitive vegetation communities, including 0.1 acre of non-native vegetation, 0.9 acre of disturbed habitat and 3.9 acres of developed land. Impacts to non-sensitive vegetation are not considered significant.

Table 3.3-4. Project Impacts to Vegetation Communities/ Land Cover Types

Vegetation Community/Land Cover Type(1)	Project Impacts(2)	
	Permanent (Acres)	Temporary (Acres)
Sensitive		
Disturbed Wetland	0.1	-
Non-native Grassland	2.5	-
Subtotal Sensitive Communities	2.6	-
Non-Sensitive		
Non-native Vegetation	0.1	-
Disturbed Habitat	0.9	-
Developed Land	3.9	-
Subtotal Non-Sensitive Communities	4.9	-
TOTAL	**7.5**	**-**

Source: Helix 2022.

Notes: (1) Vegetation Categories are from Holland (1986) and Oberbauer (2008).
(2) Upland habitats are rounded to the nearest 0.1 acre, while wetland habitats are rounded to the nearest 0.1 acre.

The project will result in direct and permanent impacts to two sensitive vegetation communities including 0.1 acre of disturbed wetland and 2.5 acres of non-native grassland. This represents a **significant impact** (**Impact BIO-2**) and mitigation is required.

- **Impact BIO-2:** The project will directly impact 0.1 acre of disturbed wetland and 2.5 acres of non-native grassland.

3.3.4.2 Jurisdictional Habitat

Threshold 3: 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, hydrologic interruption, or other means.

Direct Impacts – Jurisdictional Wetlands and Waters

The project would impact potential non-wetland waters of the U.S. subject to the regulatory jurisdiction of the USACE pursuant to Section 404 of the CWA. The project would also impact potential non-wetland waters of the State subject to the regulatory jurisdiction of the RWQCB pursuant to Section 401 of the CWA and potential streambed and CDFW jurisdictional habitat subject to the regulatory jurisdiction of CDFW per Section 1602 of the CDFW Game Code. Project impacts to jurisdictional features are summarized below within **Table 3.3-5**, and **Table 3.3-6.**

Table 3.3-5. Project Impacts to USACE/ RWQCB Jurisdiction

Habitat	Project Impacts	
	Permanent (Acres)(1)	Linear Feet
Non-Wetland Waters of the U.S/State		
Streambed	0.05	494
TOTAL	**0.05**	**494**

Source: Helix 2022.
Note: (1) Habitat rounded to the nearest 0.1 acre; total reflects rounding

Table 3.3-6. Project Impacts to CDFW Jurisdiction

Habitat	Project Impacts
	Permanent (Acres)(1)
Disturbed Wetland	0.10
Streambed	0.02
TOTAL	**0.12**

Source: Helix 2022.
Note: (1) Habitat rounded to the nearest 0.1 acre; total reflects rounding

As presented in Tables 3.3-5 and 3.3-6 above, the project would result in impacts to a total of 0.05 acre (494 linear feet) of USACE/RWQCB jurisdiction consisting of non-wetland waters of the U.S./waters of the State. The project would impact 0.12 acre of CDFW jurisdiction consisting of 0.10 acre of jurisdictional habitat (disturbed wetland) and 0.02 acre of streambed. The USACE/RWQCB impacts occur within the CDFW jurisdictional limits. Impacts to 0.12 acre of jurisdictional areas would be considered a **significant impact (Impact BIO-3**), and mitigation is required.

- **Impact BIO-3:** Project development results in a direct impact to a total of 0.05 acre (494 linear feet) of USACE/RWQCB jurisdiction (non-wetland water of the United States/water of the State and to 0.12 acre of CDFW jurisdictional areas consisting of 0.10 acre of disturbed wetland- and 0.02 acre of streambed. Impacts to a total of 0.05 acre of USACE/RWQCB jurisdiction occur within the CDFW jurisdictional limits.

Indirect Impacts – Jurisdictional Wetlands and Waters

Water quality in jurisdictional areas can be adversely affected by surface water runoff and sedimentation during construction. The use of petroleum products (e.g., fuels, oils, and lubricants) and erosion of cleared land during construction could potentially contaminate surface water. Water quality in aquatic systems and terrestrial species that depend on these resources may be adversely affected. The project is adjacent to already developed or disturbed areas and will comply with stormwater regulations, including implementation of a stormwater pollution and prevention plan (SWPPP) during construction. During project operation, no impact is anticipated due to a comprehensive water quality management approach and implementation of site design, source control, low impact development (LID), and treatment control BMPs further described in Section 3.8, Hydrology/Water Quality. Indirect impacts to jurisdictional wetlands and waters would be **less than significant.**

3.3.4.3 Wildlife Movement Corridors and Nursery Sites

Threshold 4: 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 site.

Direct and Indirect Impacts – Wildlife Movement Corridors and Habitat Linkages

The project site does not occur within a BCLA and is located within a fully developed residential area. The project site may be used by smaller urban-adapted mammal species and bird species, but is not considered refuge as a wildlife corridor or habitat linkage. Although native habitat occurs on-site, the area is small and isolated from other areas with native habitat that may be used for urban wildlife movements, foraging, or breeding. Additionally, as evidenced by biological surveys, the project site does not support critical populations of animal species. Therefore, direct and indirect impacts to wildlife movement and nursery sites would be **less than significant** and no mitigation is required.

3.3.4.4 Local Policies and Ordinances

Threshold 5: Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance.

The City establishes regulations and standards for the preservation, protection, and selected removal of vegetation, including mature and protected trees. Specifically, Section 33-1066, -1068, and -1069 of Article 55 (Grading and Erosion Control) of the City of Escondido Zoning Code regulates impacts to historically significant and/or mature trees, with a focus on oak tree protection. **Figure 3.3-6** shows the protected and mature oak trees both onsite and offsite and the projects footprint of impact.

A total of seven mature coast live oak trees and six protected coast live oak trees occur within the project site and would be subject to removal during proposed development. An additional 10 mature and 11 protected coast live oak trees occur just outside of the project site and are considered impacted, with exception of the subset occurring within a VWD easement (Figure 3.3-6 and **Table 3.3-7**). The subset located within the VWD easement will be protected by a 10-foot grading setback along

the southern property boundary. The project arborist indicated a 10-foot buffer is a sufficient distance to protect these oaks trees and recommend establishing a root zone protection zones and fencing during construction (Lightfoot Planning Group 2022). For all other adjacent oak trees, the intent is to avoid impacts; however, their root zones may encroach onto the project site and could be damaged. Impacts to mature and/or protected trees is considered a **significant impact (Impact BIO-4)** and mitigation is required.

- **Impact BIO-4:** Project construction has the potential to impact 11 protected oak trees and 12 mature oak trees both on-site and off-site.

Table 3.3-7. Protected and Mature Oak Trees Located Within and Adjacent to the Project Site

Oak Trees	On-Site	Off-Site	
		Outside VWD Easement	Within VWD Easement(1)
Protected	6	5	6
Mature	7	5	5
Total	**13**	**10**	**11**

Source: Helix 2022.
Note: (1) Not associated with project impacts. Mitigation not required.

Insects and Pests Due to Tree Removal

In their NOP comment letter, CDFW commented that the project's removal of trees has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species. This represents a **significant impact** (**Impact BIO-5)** and mitigation is required.

- **Impact BIO-5:** Removal of trees on the project site has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species.

3.3.4.5 Habitat Conservation Plans and NCCPs

Threshold 6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project is located within the boundaries of the Escondido Subarea of the MHCP. However, the Draft Escondido Subarea Plan was not approved or adopted and remains in draft form as of the date of this Draft EIR. The MHCP identifies sensitive biological resources and provides mitigation guidelines for impacts on those resources. Figures 3-2 and 4-1 in the draft Escondido Subarea Plan identify BCLAs and FPAs, respectively. As described in Section 3.3.2.3, the proposed project site is not located within a BCLA or FPA. Therefore, implementation of the proposed project would not conflict with, preclude or prevent finalizing and adoption of the plan. The proposed project impacts would be **less than significant** and no mitigation is required.

3.3.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future projects producing related impacts; or (2) a summary of projects contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. The geographic scope for the biological resources cumulative analysis is the San Diego County region.

Candidate, Sensitive, or Special Status Species

Cumulative projects located in the San Diego County region have the potential to affect special-status plant and wildlife species, including impacts related to loss of habitat. Adjacent jurisdictions, including incorporated cities, the County, and tribal governments, would be required to comply with applicable federal and/or state regulations that protect special-status plant and wildlife species, such as the federal ESA, the CESA, and the California NCCP Act. If significant impacts occur from particular cumulative projects, mitigation measures are usually implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of special-status plant and wildlife species for the entire San Diego County region, a cumulative loss of habitat supporting special-status plant and wildlife species would occur, even after mitigation has been implemented for individual projects. No direct or indirect impacts were identified for Special-Status Plants and Animal Species, with the exception of the potential to impact avian species protected under the MBTA during construction. However, mitigation measure MM-BIO-1 (see Section 3.3.6) would reduce that impact to below a level of significance. Therefore, the proposed project would not result in a cumulatively considerable contribution to special status species impacts.

Sensitive Habitats

Cumulative projects located in the San Diego County region have the potential to affect riparian habitat and other sensitive natural communities through direct and indirect loss or degradation. Adjacent jurisdictions, including incorporated cities, the County, and tribal governments, would be required to comply with applicable federal and/or state regulations such as the California NCCP Act. These programs provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and CDFW. If potentially significant impacts would occur from particular cumulative projects, mitigation measures would be implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of sensitive natural communities for the entire San Diego County region, a cumulative loss of riparian and other sensitive habitat would occur, even after mitigation has been implemented for individual projects. Implementation of mitigation measure MM-BIO-2 (see Section 3.3.6) would reduce potentially significant direct impacts to a less-than-significant level, and no net loss of riparian habitat or sensitive natural communities would occur. Therefore, proposed project impacts would not be cumulatively considerable.

Jurisdictional Habitat

Cumulative projects located in the San Diego County region have the potential to result in a cumulative impact associated with federally protected wetlands. Adjacent jurisdictions, including incorporated cities, the County, and tribal lands, would be required to comply with applicable federal and/or state

regulations such as Section 401 and 404 of the CWA and Section 1600 of the California Department of Fish and Game Code. If potentially significant impacts would occur from particular cumulative projects, mitigation measures would be implemented to reduce impacts to meet the no-net-loss standard. Implementation of mitigation measure MM-BIO-3 (see Section 3.3.6) would reduce impacts on jurisdictional habitat to a less-than-significant level. Furthermore, existing regulations would ensure that a significant cumulative impact associated with federally protected wetlands would not occur. Therefore, the proposed project, in combination with the other cumulative projects, would not contribute to a significant cumulative impact.

Wildlife Movement Corridors and Nursery Sites

Cumulative projects located in the San Diego County region have the potential to result in a cumulative impact associated with wildlife movement corridors and nursery sites. However, no local or regional wildlife corridors are identified on the proposed project site or in the immediate project vicinity. Therefore, cumulative impacts would not be considerable.

Local Policies and Ordinances

Cumulative growth under the County and adjacent jurisdictions' general plans would be required to comply with applicable local policies and ordinances, such as zoning ordinances, an adopted MHCP, and MSCP subarea plans. Similar to the proposed project, mitigation measures would be required to bring cumulative projects into compliance with existing policies and ordinances. Even if local policies and ordinances similar to the City's Environmental Quality Regulations have not been adopted in adjacent jurisdictions, compliance with CEQA would require mitigation for biological impacts. Implementation of mitigation measure MM-BIO-4 (see Section 3.3.6) would reduce significant direct impacts mature and/or protected trees to a less-than-significant level. Therefore, the proposed project, in combination with the other cumulative projects, would result in a less-than-significant cumulative impact associated with compliance with local policies and ordinances.

Habitat Conservation Plans and NCCPS

The conservation plan applicable to the proposed project (the draft Escondido MHCP Subarea Plan) has not been adopted; therefore, there would be no impact related to HCPs and NCCPs, and no cumulative impact would occur.

3.3.6 Mitigation Measures

Implementation of the following mitigation measures would be required as a condition of project approval:

- **Impact BIO-1** Candidate, Sensitive, or Special-Status Species (Migratory Bird Treaty Act)

MM-BIO-1 Trimming, grubbing, and clearing of vegetation shall be avoided during the avian breeding season, which generally runs from February 15 to August 31 (as early as January 1 for some raptors) to the extent feasible. If trimming, grubbing, or clearing of vegetation is proposed to occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to vegetation clearing to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, grubbing, and clearing of vegetation shall be allowed to proceed. If active bird nests are confirmed to be

present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive.

- Impact BIO-2 Sensitive Habitat Impacts

MM-BIO-2 Prior to impacts to any sensitive habitats (disturbed wetland and non-native grassland), the applicant shall purchase off-site mitigation credits at a mitigation bank approved by the City. Mitigation ratios shall be consistent with regional standards (i.e., the Escondido Draft Subarea Plan): non-native grassland minimum 0.5:1 and disturbed wetland minimum 1:1. The disturbed wetland mitigation shall consist of establishment/re-establishment mitigation to achieve regional no-net-loss standards for potential wetlands. Proof of mitigation purchase shall be provided to the City prior to issuance of the grading permit.

- Impact BIO-3 Jurisdictional Habitat

MM-BIO-3 Prior to any project impacts to potentially jurisdictional resources, demonstration that regulatory permits from USACE, RWQCB, and CDFW have been issued or that no such permits are required shall be provided to the City. Permanent impacts to 0.05 acre of USACE/RWQCB jurisdictional non-wetland waters of the United States/State, 0.10 acre of CDFW jurisdictional habitat, and 0.02 acre of CDFW jurisdictional streambed shall be mitigated at a minimum 1:1 ratio through one or a combination of the following off-site options, unless otherwise required by the USACE, RWQCB, and/or CDFW during the regulatory permitting process:

  - Purchase of establishment/re-establishment, rehabilitation, enhancement, and/or preservation credits from an off-site mitigation bank with a service area that overlaps the project and that is approved by the USACE, RWQCB, and CDFW, such as the San Luis Rey Mitigation Bank, and Brook Forest Conservation/Mitigation Bank; and/or
  - Acquisition or use of other off-site mitigation lands in the region to include establishment/re-establishment, rehabilitation, enhancement, and/or preservation of USACE, RWQCB, and CDFW jurisdictional resources.

Mitigation for RWQCB-jurisdictional waters shall include a minimum 1:1 establishment/ reestablishment to ensure no-net-loss. Final mitigation requirements shall be determined during the permitting process in coordination with the USACE, RWQCB, and CDFW, as appropriate.

- Impact BIO-4 Mature and Protected Trees

MM-BIO-4 The project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City's Director of Community Development. This condition can be satisfied on-site if the project's landscape plans include the appropriate number of oak trees and other tree species.

- Impact BIO-5 Infectious Tree Diseases

MM-BIO-5 The project applicant shall prepare an infectious tree disease management plan for the project. This plan should include a description of how the infectious tree disease management plan will be implemented. All trees that would be removed by the project should be inspected for contagious tree diseases including, but not limited to, thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the project site without first being treated using best available management practices relevant for each tree disease observed.

3.3.7 Conclusion

Candidate, Sensitive, or Special-Status Species

The proposed project would not result in a significant direct or indirect impact on special-status plants or wildlife.

Based on the presence of suitable avian nesting habitat, pre-construction clearance survey for nesting birds would be conducted to ensure that no impacts on nesting birds that are afforded protection under the MBTA occur (see MM-BIO-1). Mitigation measure MM-BIO-1 requires a preconstruction survey if construction is proposed during the nesting season. If nesting birds are found, avoidance measures would be implemented to minimize impacts. With the implementation of MM-BIO-1, impacts on nesting birds would be reduced to below a level of significance.

Sensitive Habitats

The project would result in direct and permanent impacts to 2.6 acres of sensitive natural communities including 0.1 acre disturbed wetland and 2.5 acres of non-native grassland. Purchase of applicable credits in a City-approved mitigation bank would fully compensate for the loss of habitat. With the implementation of mitigation measure MM-BIO-2, impacts on sensitive natural communities would be reduced to below a level of significance.

Jurisdictional Habitat

The project would result in potentially significant impacts to USACE and RWQCB jurisdictional resources (0.05 acre and 494 linear feet of Non-wetland Water of the US). The project would also result in potentially significant impact to 0.12 acre of CDFW jurisdiction (0.10 acre of disturbed wetland and 0.02 acre of streambed). Mitigation is proposed at minimum standard ratios consistent with those typically required by the Resource Agencies; thus, would fully compensate the loss and reduce impacts to below a level of significance. With the implementation of mitigation measure MM-BIO-3, impacts to potentially jurisdictional resources would be less than significant. Notification for securing necessary regulatory permits prior to impacts would be required for the project per MM-BIO-3. If the potential wetlands or waters of the U.S. are ruled jurisdictional by the Resource Agencies, the anticipated permits would be a 404 permit from the USACE, 401 Certification from the RWQCB, and a 1602 agreement from CDFW. Final permit requirements would be determined through consultation with the Resource Agencies.

Wildlife Movement Corridors and Nursery Sites

The project would result in less-than-significant direct and indirect impacts associated with wildlife movement corridors and nursery sites. Therefore, no mitigation is necessary.

Local Policies and Ordinances

Project impacts to mature and/or protected trees would be mitigated with the implementation of mitigation measure MM-BIO-4, which requires that a vegetation removal permit and appropriate standards for the replacement of vegetation approved for removal be followed, and mature and/or protected tree preservation or replacement would occur. With the implementation MM-BIO-4, impacts to mature and/or protected trees would be reduced to below a level of significance.

Additionally, the removal of trees has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This would be mitigated with the implementation of mitigation measure MM-BIO-5. This mitigation measures requires the preparation and implementation of an infectious tree disease management plan for the project.

Habitat Conservation Plans and NCCPs

The conservation plan applicable to the proposed project (the draft Escondido MHCP Subarea Plan) has not been adopted. Until the draft Escondido MHCP Subarea Plan is approved, the City follows MHCP guidelines or regulatory guidance for projects within City limits. There would be no impact related to HCPs and NCCPs. Further, Compliance with existing regulations and implementation of measures MM-BIO-1 through MM-BIO-4 would help ensure that impacts to sensitive biological resources are avoided and the project activities are not in conflict with the MHCP.

Figure 3.3-1. Existing Vegetation Communities and Land Cover Types

Source: Helix 2022.

Figure 3.3-2. Potential CDFW Jurisdictional Resources

Source: Helix 2022.

Figure 3.3-3. Potential USACE Jurisdictional Resources

Source: Helix 2022.

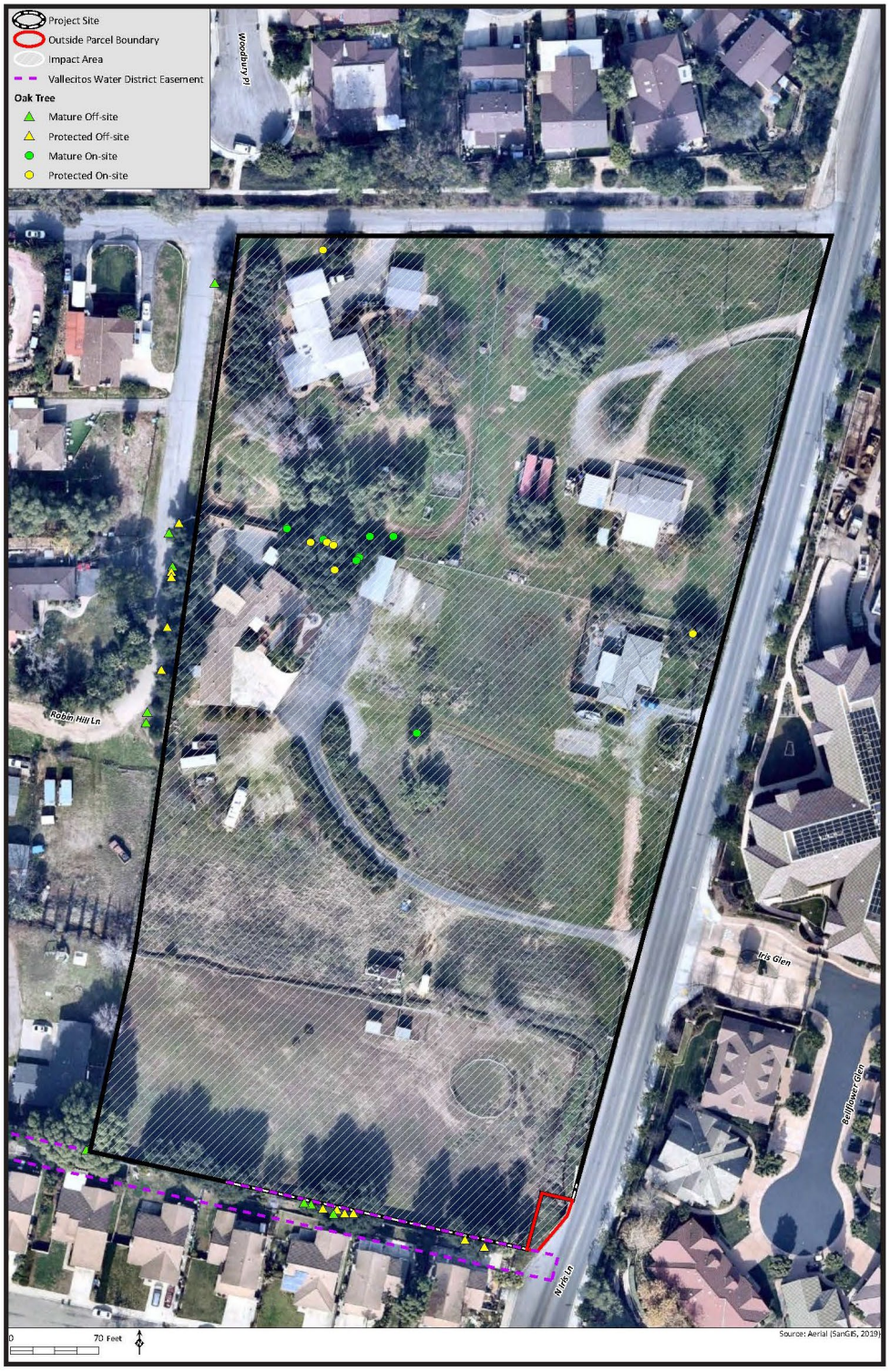
Figure 3.3-4. Potential RWQCB Jurisdictional Resources

Source: Helix 2022.

Figure 3.3-5. Proposed Project Vegetation Impacts

Source: Helix 2022.

Figure 3.3-6. Oak Tree Impacts



Source: Helix 2022.

3.4 Cultural Resources/Tribal Cultural Resources

This section of the Environmental Impact Report (EIR) describes the existing cultural resources in the proposed project area. Cultural resources addressed include archaeological, historical, and tribal resources, as well as human remains. This section evaluates existing cultural resources, analyzes the potential impacts that may occur under the proposed project, recommends mitigation measures to reduce or avoid impacts on these resources, and examines levels of significance after mitigation.

General information in this section is taken from the Escondido General Plan Update (City of Escondido 2012b) unless otherwise referenced. Project-specific information is from the Cultural Resources Survey Report for the North Iris Lane TM Project, City of Escondido, California (Appendix F) prepared by Laguna Mountain Environmental (LME) in December 2021.

3.4.1 Existing Conditions

The cultural environment consists of the remains of prehistoric- and historic-era human activities. The city contains numerous recorded resources, including prehistoric archaeological sites, historic archaeological sites, historic features relating to water storage and water conveyance, historic buildings and structures, and known cemeteries. The following discussion provides background information, as well as an inventory of the essential components that make up the project area's cultural environment.

Local Background

Cultural resources are generally defined in terms of the tangible materials attributed to a culture. These include districts, sites, structures, artifacts, and other evidence of human use considered important to a culture or community for scientific, traditional, religious, or other reasons. Types of resources include archaeological resources, historic structures, historic districts, traditional cultural properties, and landscapes. Cultural resources may also consist of less tangible attributes, such as landscapes considered sacred to particular groups. These resources can provide clues about prehistoric- and historic-era human behaviors, and provide scientific, religious, and other valuable educational information about the cultural past.

Cultural resources are identified using standard protocols and are evaluated based on a variety of established criteria. There are four general types of designations for significant cultural resources within the project area. The system includes federal designation in the National Register of Historic Places (NRHP) for resources of importance and relevance to national heritage, state-level designation in the California Register of Historical Resources (CRHR), County-level designation in the San Diego County Local Register of Historical Resources, and designation as Escondido Historical Landmarks for resources of importance to local history and culture. Each of these registers uses different criteria to determine whether a resource could be determined eligible for inclusion; these criteria are discussed below in Section 3.4.2, "Regulatory Framework." The integrity of the resource, its attributes, and its location are also key factors in establishing its significance.

As defined in this document, cultural resources consist of the remains of prehistoric- and historic-era human behaviors, including both archaeological and historic resources. Archaeological resources include artifacts and features found on both the ground surface or under the surface and include both prehistoric and historic time periods. Historic resources refer to built environment features aged 50 years or older and include buildings, structures, and other features such as flumes, roads, bridges, and tunnels.

Archaeological and Tribal Resources

The Archaeological Resources setting is drawn from the Escondido General Plan Program EIR (City of Escondido 2012b) unless otherwise cited.

Prehistoric Setting

Archaeological evidence indicates that the San Diego County (County) region has a long cultural history beginning approximately 10,000 years ago. Recent scholarship on Native American (Pre-Contact) human occupation in the County recognizes the existence of at least two major cultural traditions identified as the Early Period/Archaic and Late Period by Gallegos 2007 as cited in City of Escondido 2012b. However, the prehistory of San Diego is also often divided into three chronological sequences based on material and cultural constituents: Paleo-Indian, Archaic, and Late Prehistoric periods (BFSA as cited in City of Escondido 2012b).

Early Period/Archaic

The Early Period/Archaic includes the time period spanning from approximately 10,000 to 1,300 years ago and includes the San Dieguito, La Jolla, and Pauma Complexes. The earliest accepted archaeological manifestation of human occupation in the San Diego area is the San Dieguito Complex, which dates to approximately 10,000 years ago. The San Dieguito Complex is chronologically equivalent to other Paleo-Indian complexes across North America. The material culture of the San Dieguito Complex is primarily characterized by a flaked or chipped stone component consisting of scrapers, scraper planes, choppers, drills, gravers, large lanceolate bifaces, and large foliate (leaf-shaped) projectile points. Various researchers recognized the regional similarity of such artifact assemblages and termed interior sites of the same age as either the Western Pluvial Lakes Tradition or the Western Lithic Co-Tradition. Tools and debitage made of fine-grained green metavolcanic material (felsite) were found at many sites that Rogers identified as San Dieguito, lending to the presence of felsite as a San Dieguito hallmark (Rogers 1939 as cited in City of Escondido 2012b). There is an overall lack of milling stone equipment, suggesting that hard seeds may not have been an important part of the diet during this period. San Dieguito sites are typically found on or near former pluvial lake shores, marshes, and old stream channels; and coastal sites indicate that shellfish was an important dietary resource for peoples living near the Pacific Ocean. Sleeping circles, trail shrines (cairns), and rock alignments have also been associated with San Dieguito sites, helping to support the conclusion that San Dieguito peoples practiced a mobile hunting and gathering lifestyle based on terrestrial and aquatic resources.

The La Jolla and Pauma Complexes are often referred to as following the San Dieguito Complex. The La Jolla Complex is associated with shell midden sites on the coast; and the Pauma Complex is associated with inland sites, particularly located in valleys and sheltered canyons in northern San Diego County. Because the two complexes have similar artifact assemblages, it is believed that the Pauma Complex may represent an inland variation of the La Jolla Complex. Gallegos notes that these complexes may represent a seasonal or geographic variation of an older and more general San Dieguito Complex (Gallegos 2007 as cited in City of Escondido 2012b). This is based on a pattern of observable cultural continuity exhibited in the material culture assemblages of Early/Archaic Period sites (2007 as cited in City of Escondido 2012b). Nonetheless, many researchers have focused on the proliferation of ground stone tools and an increased level of sedentism to differentiate the La Jolla and Pauma Complexes from the San Dieguito Complex.

The La Jolla and Pauma Complexes reflect subsistence patterns focused on gathering plant foods and small animals, including near-shore fish and shellfish. Ground stone milling equipment, including

manos and metates, appear in large numbers and dominate their tool assemblages. In addition to manos and metates, assemblages contain discoidals (perforated rounded stones), cog stones (perforated rounded and grooved stones), finely worked small domed scrapers, flaked cobble tools, and large notched and stemmed dart points. Flexed burials with the head pointed northward under rock cairns, and often containing many broken tools, are also associated with these complexes.

Late Period

By the advent of the Late Period, which spans from 1,300 years ago to historic contact (1769), a material culture pattern similar to that of historic Native Americans becomes apparent in the archaeological record. Cultural change and social complexity reflect both an adaptation to variations in environmental conditions and an influence from outside groups. The results of these adaptations are shown through changes in material culture, subsistence patterns, and burial practices throughout the period, over time and space. The economic pattern during this period appears to be one of more intensive and efficient use of local resources. The prosperity of these highly refined economic patterns is well evidenced by the numerous Kumeyaay/Diegueño and Luiseño habitation sites scattered throughout the County. This increase in Late Period site density probably reflects both better preservation of the more recent archaeological record and a gradual population increase within the region. Artifacts and cultural patterns reflecting this Late Period pattern include small projectile points, pottery, the establishment of permanent or semi-permanent seasonal village sites, a proliferation of acorn milling sites in the uplands, the presence of obsidian from the Imperial Valley source Obsidian Butte, and interment by cremation.

Luiseño occupation in northern San Diego County during the late Holocene has been viewed as an occupation that migrated from the desert to the coast, an incursion called “the Shoshonean Wedge.” Late Period culture patterns were shared with groups along the northern and eastern periphery of San Diego County, incorporating many elements of their neighbors’ culture into their own cultures. This transference and melding of cultural traits between neighboring groups makes positive association of archaeological deposits with particular ethnographically known cultures difficult. This is particularly true of the groups within this portion of the County. Although significant differences exist between Luiseño and Kumeyaay/Diegueño cultures (including linguistic stock), the long interaction of these groups during the Late Period resulted in the exchange of many social patterns. Archaeologists must rely heavily on ethnographic accounts of group boundaries as recorded during the historic period to inform ethnographic occupation of particular areas.

In 1925, ethnographer Alfred Kroeber placed the Kumeyaay/Diegueño and Luiseño boundary between Agua Hedionda and Batiquitos Lagoon (Kroeber 1925 as cited in City of Escondido 2012b). These lagoons are located approximately 13.5 miles east of the center of the City of Escondido, placing the Escondido area in a transitional area for the Diegueño and Luiseño groups. Diegueño is recognized as a member of the California-Delta Yuman division of the Yuman-Cochimi language family and includes three main dialects: Ipai, Kumeyaay, and Tipai (Luomala 1978 as cited in City of Escondido 2012b). The Ipai occupied the central portion of the County, while the Kumeyaay inhabited the southern portion of the County, including lands extending into the California portion of the Colorado Desert. The Tipai territory included the lands from Jamul southward into Baja California, south of Ensenada. Modern ethnographers tend to combine the Kumeyaay and the Tipai as a single, continuous social group. The Luiseño traditional use area is then mapped as extending from the Pacific Ocean inland to Lake Elsinore and Palomar Mountain in the east and extending from Agua Hedionda in the south to Aliso Creek in the north (Bean and Shipek 1978 as cited in City of Escondido 2012b).

Historic Resources

Historic Setting

The Historic Setting is drawn from the Escondido General Plan Program EIR (City of Escondido 2012b) unless otherwise cited.

The historic era (post-Contact) in southern California is commonly presented in terms of Spanish, Mexican, and American political domination. Certain themes are common to all periods, such as the development of transportation, military activities, settlement, and agriculture.

Spanish Period (1769–1821)

The history of modern San Diego County dates to early Spanish explorations in the area. In 1542, Juan Rodriguez Cabrillo claimed the bay for Spain, and named this place "San Miguel." Thereafter, the Spanish colonization of California was achieved through a program of military-civilian-religious conquest. Under this system, soldiers secured areas for settlement by suppressing native and foreign resistance and established fortified structures (presidios) from which the colony would be governed. Civilians established towns (pueblos) and stock-grazing operations (ranchos) that supported the settlement and provided products for export. The missionary component of the colonization strategy was led by Spanish priests, who were charged with converting Native Americans to Catholicism, introducing them to Spanish culture, and training them as a labor force. Ultimately, four presidios and 21 missions were established in Spanish California between 1769 and 1821.

In the general vicinity of the proposed project area, the San Diego and San Luis Rey Missions were established along the Pacific coastline. However, the Escondido Valley was not under the jurisdiction of the San Diego or San Luis Rey Missions. Due to the relative remoteness of Escondido, early historic land use was limited to grazing, although scouting parties associated with the missions did come to the area in search of Native American laborers and religious converts.

Horses, cattle, agricultural foods, weed seeds, and a new architectural style and method of building construction were introduced during the Spanish period; and Spanish influence continued after 1821, when California became a part of Mexico. For a period of time under Mexican rule, the missions continued to operate as in the past, and laws governing the distribution of land were also retained.

Mexican Period (1821–1848)

Mexico achieved independence from Spain in 1821, and California became a distant outpost of the Mexican Republic. Under a law adopted by the Mexican congress in 1833, the former mission lands were secularized and subdivided into land grants. Cattle ranching prevailed over agricultural activities, and the development of the hide and tallow trade increased during the early part of this period. In 1843, Juan Bautista Alvarado, a native of San Diego, received the land grant described as El Rincon del Diablo Rancho (Corner of the Devil). This grant was bestowed to Alvarado by Mexican Governor Manuel Micheltoren and consisted of a 12,633-acre tract including the majority of present-day Escondido. Alvarado built a large adobe house overlooking Escondido and raised cattle on his land. Beginning in the early 1840s, Mexico's hold on California was threatened by the steady overland migration of American settlers into the region. War between the United States and Mexico commenced in May 1846, and the Mexican Period ended in 1848, at the end of the Mexican-American War.

American Period (1848 to Present)

The American Period began in 1848 when Mexico ceded California to the United States under the Treaty of Guadalupe Hidalgo. Few Mexican ranchos remained intact because of legal costs and the difficulty of producing sufficient evidence to prove title claims, and much of the land that once constituted rancho holdings became available for settlement by immigrants to California. In the early 1850s, Alvarado and his wife died, and their descendants began to subdivide and sell their land. Judge Oliver S. Witherby of San Diego began buying portions of the El Rincon del Diablo Rancho, and it took him approximately 10 years to acquire the entire rancho. Witherby farmed his property extensively and increased the size of his cattle and sheep herds. In the early 1860s, Witherby began mining gold on his property and built a mill to grind ore under the auspices of the Rincon del Diablo and Escondido Mining Company. This was the first recorded use of the word "Escondido" in the area.

In 1886, the Escondido Land Company was formed and began dividing over 12,000 acres of prime Escondido real estate. The City of Escondido was incorporated 2 years later in 1888. Construction commenced on a rail line extending from Oceanside to Escondido in 1887, and the first freight left Escondido via rail in January 1888. The advent of the railroad led to an increase in population, retail business, and the export of agricultural products. With the assistance of the railroad, the economic base of burgeoning Escondido became focused on agriculture and was supported by gold mining and tourism. One event that brought tourists into Escondido via rail was Grape Day. This event was first held on September 9, 1908 and was meant to celebrate the annual grape harvest. Grape Day continued to be a very popular celebration until 1950, when a lack of grapes in the valley caused the festival to end. Grape Day was then officially revived in 1996 and continues to be celebrated in Grape Day Park in downtown Escondido to the present day.

In 1950, U.S. Highway 395 connected Escondido to San Diego, allowing for an easier and faster commute between the two areas. At this same time, numerous defense contracts relating to the Cold War and Korea conflicts existed in the County, and these contracts created a variety of new job opportunities. Collectively, increased travel efficiency and employment prospects led to a population increase in the Escondido area. Subdivisions were constructed to accommodate the population influx, and these subdivisions replaced many of the vineyards and citrus groves on the east end of town. Thereafter, citrus production began to decline quickly, with groves converted to avocado production, and the area's largest packing house closed in 1960. These agricultural pursuits were replaced with industry and retail as important economic pursuits during the ensuing decades. Presently, the City boasts Palomar Medical Center, Escondido Auto Park, and Westfield Shopping Town North County as major employers and retail options.

Project Site

As indicated above, a project-specific Cultural Resources Survey for the North Iris Lane TM Project, Escondido, California was prepared by LME December 2021 (Appendix F). As a part of this effort, a records search, site history research, historic architectural survey, and archaeological survey were completed. The archaeological field survey was conducted on March 26, 2021, by an archaeologist and Native American monitor. Small portions of the property had been previously cut/leveled during construction of the four existing houses on the property, but the project area was otherwise undisturbed. Surface visibility was highly variable depending upon non-native weed cover and native vegetation. Survey visibility averaged approximately 40 percent. Although dense grasses and non-native weeds were present, other areas included shrub openings and areas of bare soil. Rodent backdirt was carefully examined in areas of lower surface visibility. The cultural resources survey of the project adequately served to identify cultural resources.

Records Search

On March 22, 2021, a records search for the proposed project site and a 1-mile search radius was requested from the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University. The records search included a search of all relevant site records and prior reports on file with the SCIC, as well as a search of the NRHP, the CRHR, and other local registers to determine whether significant archaeological or historical sites have previously been recorded within or near the proposed project site.

The records search identified a total of 56 previous cultural resource studies that address areas within a one-mile radius of the proposed project site. Most of these studies deal with residential and commercial development projects, historic structure assessments, and infrastructure development. The project area was not subject to field inspection based on any of these investigations. The records search identified 20 previously recorded sites and within a one-mile search radius. Thirteen are prehistoric, six are historic, and one is a prehistoric milling site with historic refuse. The prehistoric sites consist of bedrock milling locales, lithic scatters, temporary camps, habitation sites associated with bedrock milling, and an isolate mano. The historic resources include two residences, a house foundation, a water reservoir tank, a flume, and a highway. None of these previously recorded sites intersect the proposed project site. Refer to Tables 1 and 2 of the Cultural Resources Report in Appendix F of this EIR for a full list of all previously cultural resource investigations and recorded sites within one mile of the proposed project site.

Historical Resources

Historic maps and aerial photographs of the area were reviewed during the current project. They indicate that the project was on the margin of the community of Escondido and largely agricultural in the past. 1938 and 1947 aerial photographs show the area as plowed agricultural land (NETR 1938 and 1947 as cited in LME 2021). Historical USGS quadrangle maps do not show any structures within the project area until the 1970 edition map.

The cultural resources survey identified four standing structures of historic age (2039 North Iris Lane, 2047 North Iris Lane, 2085 North Iris Lane, 2089 North Iris Lane) within the project area. In addition, a single prehistoric isolated artifact (P-37-039446) was also present in the project area during the initial site visit. However, a revisit to the project area determined that the prehistoric artifact was a purchased item and had not originated in the project area. Each of these resources will be described in greater detail below. Resources forms were submitted to the SCIC (Appendix D of the Cultural Resources Report – Appendix F of this EIR).

2309 North Iris Lane

This residential structure and garage are a ranch style house (**Figure 3.4-1**). It is located in the west-central portion of the project area. The house was built about 1961 for Jason and Frances Swanson. Jason Swanson occupation is listed as a civil servant. The structure first appears on the 1964 aerial photograph of the area. Debra Lindblad, the daughter of James and Frances Swanson is the current owner. The house is three bedroom, 1 ½ bathroom with a total of 1,672 square feet (LME 2021).

The house is wood frame with stucco siding. The lower portions of the exterior walls have decorative vinyl siding. The roof is a very low angle composite shingle hipped roof with relatively wide eave overhangs and added gutters. The house has a concrete block fireplace. The structure was originally smaller and did not include the present large garage addition. The original garage appears to have been located on the southern side of the current house. Aerial photographs show that between 1967

and 1978 significant changes were made to the original structure (NETR 1967, 1978 as cited in LME 2021).

The large garage was added at the southern side of the original structure. The original garage appears to have been converted into rooms and a rear room extension was added. Windows may have been replaced with vinyl at that time and the entryway also appears to have been significantly modified. The original character of the structure appears to have been significantly altered.

2047 North Iris Lane

This is another single-family house built about 1961. Mrs. Frances Zickefoose first appears as the owner in the 1961 City Directory and continues after that date. It has two bedrooms and one bathroom and is 1,160 square feet (s.f.). The structure was apparently remodeled between 1967 and 1978 which appears to have included the rear addition to the original structure (NETR 1967, 1978 as cited in LME 2021).

The house is a single story Minimal Traditional style structure with attached garage **(Figure 3.4-2).** The structure is wood frame with stucco siding while the lower portion of the siding is vinyl clapboard. The vinyl siding may be a later addition. The roof is low angled hipped with composite shingles. Windows are largely vinyl, but a large sliding glass door north of the garage door has aluminum framing.

2085 North Iris Lane

This house is the earliest structure built within the project area. The house was built in 1951 for Bob and Jenny Beals. They appear to have been the original owners of the entire project area, who later sold other lots for development. The house has two bedrooms and one bathroom with a total of 868 s.f. This house is the only structure that appears within the project area on the 1953 aerial photograph of the project area (NETR 1953 as cited in LME 2021).

The structure is a Minimal Traditional single-story residence located at the highest point within the project area. The structure is wood frame with stucco finish (**Figure 3.4-3**). The roof is composite shingle low gable with three separate levels. Windows are largely vinyl sash replacements along with a set of French doors bounded by paned windows on the western front side. Most windows are divided vertically, but at least one is horizontal. The treatment surrounding the windows is a wide plan board. In addition to the window and door replacements, a carport and large rear patio addition have been made after 2014 (NETR 2014, 2016 as cited in LME 2021).

2089 North Iris Lane

This structure is a somewhat ranch style house that was also probably completed in 1961 **(Figure 3.4-4)**. The structure first appears on the 1964 aerial photograph of the area (NETR 1964). It was originally an oddly angled roughly "L-shaped" structure in outline. Aerial photographs show that between 1967 and 1978 significant changes were made to the original structure (NETR 1967,1978 as cited in LME 2021). Large additions transforming the structure into a roughly "T-shape" outline were made. Between 1995 and 1996, a separate garage building was constructed to the northeast of the house (NETR 1996 as cited in LME 2021).

The structure is wood frame with both stucco and board and batten siding. This structure has a low angle gable roof with tar and gravel finish. Several added skylights are present. Windows are vinyl sash with both vertical and horizontal panes. The structure has been significantly modified from its original character through additions.

Archaeological Resources

One previously unrecorded isolate biface preform (P-37-039446) was identified during the initial pedestrian survey (March 2021).

P-37-039446 (IL-I-1)

The isolate is a Santiago Peak Volcanic biface preform. The artifact is a large (15 cm long), early-stage biface preform. The surface is weathered and patinated. Preforms of this size and type have typically been associated with the San Dieguito or Paleoindian Period. It was located in the northwestern portion of the project area, less than three meters from the backyard patio of the residence addressed as 2089 North Iris Lane. The area has a row of olive trees that appear to be a remnant of earlier agriculture. To the west and upslope, a graded cut is present and bedrock is exposed in several areas. The artifact was found loose on top of the soil. In this context, so close to the house, it could not originally be determined whether the artifact was a relic collected (and discarded) by inhabitants of the house at some time or was originally present at this location. Surface visibility in the immediate vicinity was very good and no other artifacts were present.

The project area was revisited on October 15, 2021. At that time, the isolated artifact (P-37-039446) was found to have been relocated to a picnic table and additional decorative rocks and artifacts were present on the table. Conversation with the homeowner indicated that the prehistoric biface, along with a red sandstone slab metate, had been purchased in Arizona near Lake Powell. A granitic bifacial mano that had been painted by one of her children was thought to have been collected by a relative. Per the homeowner, none of the artifacts and decorative rocks present had originated on the project site. This was consistent with the appearance of the sandstone metate. The brown rhyolite used for the biface preform was also more consistent with an Arizona source than a local one where brown is a rare color form. Based on this evidence, the results of the survey of the project area are negative for the presence of Native American cultural resources.

Tribal Resources

Cultural resources include properties of traditional religious and cultural significance to groups or individuals, including local Native Americans. Such resources consist of archaeological resources or areas containing human remains, as well as landscapes or features in the natural environment important for their role in oral tradition or in existing religious tradition. These resources are often different than those detected by professional archaeological surveys or by the review of the existing archaeological record, and often pertain to other perspectives about the presence of Native Americans in the region beyond the prehistoric and historic setting presented above. As described by creation stories, Native Americans have been present in the region from the beginning of time. In accordance with this view, the distinction that is made between different archaeological cultures or periods, such as the La Jolla and San Dieguito, is not necessarily recognized. Instead, some groups or individuals believe that there is a continuum of ancestry, from the first people to the present Native American populations of San Diego County. To acknowledge this perspective, research on the presence or absence of known Native American resources is necessary to fully document existing conditions for cultural resources. In addition, consultation with affected Native American communities can be beneficial to fully understand potential impacts on cultural resources.

Research on the presence of Native American resources is initially completed through a Sacred Lands File database search by the Native American Heritage Commission (NAHC). Thereafter, research is completed by obtaining responses or comments from contacts named by the NAHC as having knowledge about a particular project area. Formal consultation is then typically administered pursuant

to Assembly Bill (AB) 52, described below in Section 3.4.2, "Regulatory Framework." The California NAHC was contacted to identify possible sacred lands within the proposed project site, and none were identified. The sacred sites search identified the region as generally sensitive. The NAHC provided a list of contact information for local Native American representatives who may have an interest or concerns regarding the proposed project. All persons listed by the NAHC were contacted on April 23, 2021. As of the time of publication of this document, responses from three of the tribal contacts were received. The San Pasqual Band of Mission Indians (April 26, 2021) indicated that the project was within their Traditional Use Area and requested additional information and consultation. The Viejas Band of Kumeyaay Indians (April 29, 2021) determined that the project site has cultural significance or ties to Viejas and requested a Kumeyaay cultural monitor be on site during ground disturbing activities. The San Pasqual Band of Diegueno Mission Indians of California deferred to a closer Kumeyaay tribe (July 2, 2021). A record of correspondence with the Native American community is included in Appendix C to the Cultural Resources Survey (Appendix F).

The City also conducted Tribal consultation per Assembly Bill 52 for the proposed project. The City's consultation included consultation letters (dated July 28,2021) mailed to five local Native American groups, including Rincon Band of Luiseño Indians, San Luis Rey Band of Mission Indians, Mesa Grande Band of Mission Indians, San Pasqual Band of Mission Indians, and Soboba Band of Luiseño Indians. Per their request for formal consultation, and in accordance with AB 52 & SB 18, the City met with three Tribes as part of the consultation process. The City met with the San Pasqual Band of Mission Indians, San Luis Rey Band of Mission Indians, and Rincon Band of Luiseño Indians.

Human Remains

Human remains can be considered cultural resources for a number of reasons. Some human remains are evidence of burial places that represent events, customs, or beliefs common to many cultures, locations, or time periods. Other human remains are unique representatives of specific people or events. Cemeteries and burial places traditionally have been regarded as sacred and inviolate, especially by those whose ancestors are buried there. The concern of Native Americans about appropriate and respectful disposition of burial remains and objects of their descendants has resulted in greater sensitivity toward those for whom a burial place has familial or cultural importance.

In addition to unearthed human remains that may have cultural significance, established cemeteries and burial places may be considered cultural resources. Cemeteries and burial places can often qualify for listing in registers of significant resources, and several cemeteries in unincorporated San Diego County are included on the San Diego County Historic Property Listing. Properties eligible for such listing include town cemeteries and burial grounds whose creation and continuity reflect the broad spectrum of the community's history and culture; family burial plots that contribute to the significance of a farmstead; beautifully designed garden cemeteries that served as places of rest and recreation; graveyards that form an important part of the historic setting for a church or other religious building being nominated; formal cemeteries whose collections of tombs, sculptures, and markers possess artistic and architectural significance; single or grouped gravestones that represent a distinctive folk tradition; graves or graveyards whose survival is a significant or the only reminder of an important person, culture, settlement, or event; and burial places whose location, grave markers, landscaping, or other physical attributes tell something important about the people who created them (NPS 2011 as cited in City of Escondido 2012b).

3.4.2 Regulatory Framework

3.4.2.1 Federal Regulations

American Indian Religious Freedom Act

The American Indian Religious Freedom Act, Title 42 United States Code, Section 1996, protects Native American religious practices, ethnic heritage sites, and land uses.

National Historic Preservation Act and the National Register of Historic Places

Federal regulations for cultural resources are primarily governed by Section 106 of the National Historic Preservation Act (NHPA) of 1966, which applies to actions taken by federal agencies. The goal of the Section 106 review process is to offer a measure of protection to sites that are listed or determined eligible for listing in the NRHP. The criteria for determining NRHP eligibility are found in 36 Code of Federal Regulations (CFR) Part 60. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and affords the federal Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 CFR Part 800. The NRHP criteria (36 CFR 60.4) are used to evaluate resources when complying with Section 106 of the NHPA. Those criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and any of the following:

a. Are associated with events that have made a significant contribution to the broad patterns of our history
b. Are associated with the lives of persons significant in our past
c. Embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction
d. Have yielded or may be likely to yield, information important to history or prehistory

Eligible properties must meet at least one of the criteria and exhibit integrity. Historical integrity is measured by the degree to which the resource retains its historical attributes and conveys its historical character, the degree to which the original fabric has been retained, and the reversibility of changes to the property.

Historic districts derive their importance from being considered a unified entity, even though they are often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties. A "district" is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development. A district's significance and integrity should help determine the boundaries.

Within historic districts, resources are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because it was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or it independently meets the criteria for listing in the NRHP.

Archaeological site evaluation assesses the potential of each site to meet one or more of the criteria for NRHP eligibility based on visual surface and subsurface evidence (if available) at each site location, information gathered during the literature and records searches, and the researcher's knowledge of and familiarity with the historic or prehistoric context associated with each site.

Native American Graves Protection and Repatriation Act

Enacted in 1990, the Native American Graves Protection and Repatriation Act conveys to American Indians of demonstrated lineal decent, the human remains and funerary or religious items that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. It also makes the sale or purchase of American Indian remains illegal, whether or not they derive from federal or Indian lands.

Secretary of the Interior's Standards

The Secretary of the Interior SOI is the head of the U.S. Department of the Interior, which is the nation's principal conservation agency. The department oversees agencies including the Bureau of Land Management, the Bureau of Indian Affairs, and the National Parks Service.

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation

The purpose of the SOI's Standards and Guidelines for Archaeology and Historic Preservation of 1983 is to (1) organize the information gathered about preservation activities; (2) describe results to be achieved by federal agencies, states, and others when planning for the identification, evaluation, registration, and treatment of historic properties; and (3) integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve the nation's culture heritage.

The Secretary of Interior Standards for Rehabilitation

Developed in 1986, the SOI's Standards for Rehabilitation are 10 basic principles created to help preserve the distinctive character of a historic building and its site, while allowing for reasonable change to meet new needs.

The Secretary of Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings

The SOI's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings were developed in 1995 to help protect the nation's irreplaceable cultural resources by promoting consistent preservation practices. The Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. As such, they cannot, in and of themselves, be used to make essential decisions about which features of a historic property should be saved and which might be changed. But once an appropriate treatment is selected, the Standards provide philosophical consistency to the work.

3.4.2.2 State Regulations

California Environmental Quality Act and the California Register of Historical Resources

Under the California Environmental Quality Act (CEQA), public agencies must consider the impacts of their actions on both historical resources and unique archaeological resources. Pursuant to Public

Resources Code (PRC) Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." PRC Section 21083.2 requires agencies to determine whether proposed projects would have effects on unique archaeological resources.

"Historical resource" is a term with a defined statutory meaning (refer to PRC Section 21084.1 and State CEQA Guidelines, Section 15064.5[a] and [b]). The term applies to any resource listed in or determined to be eligible for listing in the CRHR. The CRHR includes California resources listed in or formally determined eligible for listing in the NRHP, as well as certain California Historic Landmarks and California Points of Historical Interest.

Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be historical resources for purposes of CEQA, unless a preponderance of evidence indicates otherwise (PRC Section 5024.1 and California Code of Regulations, Title 14, Section 4850). Unless a resource listed in a survey has been demolished, has lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for listing in the CRHR.

In addition to assessing whether historical resources potentially affected by a proposed project are listed in an inventory or have been identified in a survey process, lead agencies have a responsibility to evaluate the resources against the CRHR criteria prior to making a finding as to a proposed project's impacts on historical resources (PRC Section 21084.1 and State CEQA Guidelines Section 15064.5[a][3]). In general, a "historical resource," under this approach, is defined as any object, building, structure, site, area, place, record, or manuscript that:

a. Is historically or archeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political or cultural annals of California; and

b. Meets any of the following criteria:

    1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    2) Is associated with the lives of persons important in our past;

    3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

    4) Has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological resources can sometimes qualify as historical resources (State CEQA Guidelines, Section 15064.5[c][1]). In addition, PRC Section 5024 requires consultation with the Office of Historic Preservation when a project may affect historical resources located on state-owned land.

For historic structures, State CEQA Guidelines Section 15064.5(b)(3) indicates that a project that follows the SOI's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the SOI's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings shall mitigate impacts to a level of less than significant. Potential eligibility also rests on the integrity of the resource. "Integrity" is defined

as the retention of the resource's physical identity that existed during its period of significance. Integrity is determined through considering the setting, design, workmanship, materials, location, feeling, and association of the resource.

As noted above, CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. PRC Section 21083.2(g) states that "unique archaeological" resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

a. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

b. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

c. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Treatment options under PRC Section 21083.2 include activities that preserve such resources in place and in an undisturbed state. Other acceptable methods of mitigation under PRC Section 21083.2 include excavation and curation, or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a unique archaeological resource).

Advice on procedures to identify cultural resources, evaluate their importance, and estimate potential effects is given in several agency publications, such as the series produced by the Governor's Office of Planning and Research (OPR). The technical advice series produced by OPR strongly recommends that Native American concerns and the concerns of other interested persons and corporate entities—including, but not limited to, museums, historical commissions, associations, and societies—be solicited as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains.

State CEQA Guidelines Section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that the County coroner be called in to assess the remains. If the County coroner determines that the remains are Native American, the NAHC must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as timely identified by the NAHC. Section 15064.5 directs the lead agency (or project proponent), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

California Historical Landmarks

The State Historical Landmarks Program places an emphasis on well-known places and events in California history. The goals of the program include the preservation and maintenance of registered landmarks, most of which include missions, early settlements, battle sites, and gold rush sites.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act of 2001 conveys to American Indians of demonstrated lineal descent the human remains and funerary items that are held by state agencies and museums.

California Points of Historical Interest Program

The State Points of Historical Interest Program was established in the effort to accommodate local historic properties not able to meet the restrictive criteria of the State Historical Landmarks Program. The Points of Historical Interest Program requires the participation of local governmental officials, such as the chairperson of the Board of Supervisors, in the approval process.

Government Code

Section 25373

Government Code Section 25373 gives authority to local governments to acquire property for the preservation or development of a historical landmark. In addition, local governments may provide special conditions or regulations for the protection, enhancement, perpetuation, or use of places, sites, buildings, structures, works of art, and other objects having a special character or special historical or aesthetic interest or value.

Section 27288.2

Government Code Section 27288.2 requires the County Recorder to record a certified resolution establishing a historical resources designation issued by the State Historical Resources Commission or a local agency. For previously designated properties, the county may record the certified resolution establishing the historical resources designation upon submission.

Sections 50280-50290 – Mills Act

The Mills Act provides for reduced property taxes on eligible historic properties in return for the property owner's agreement to maintain and preserve the historic property. Properties must be preserved in accordance with the standards and guidelines set forth by the SOI. In order to be designated, a building must meet qualifying criteria, such as significant architecture, association with a historically significant event or person, or location in an historic district.

Health and Safety Code

Sections 18950-18961 – State Historic Building Code

Health and Safety Code Sections 18950 through 18961 provide alternative building regulations and building standards for the rehabilitation, preservation, restoration (including related reconstruction), or relocation of buildings or structures designated as historic buildings. Such alternative building standards and building regulations are intended to facilitate the restoration or change of occupancy so as to preserve their original or restored architectural elements and features, to encourage energy conservation and a cost-effective approach to preservation, and to provide for the safety of the building occupants.

Section 7050.5 – Human Remains

Section 7050.5(b) of the California Health and Safety Code specifies protocol when human remains are discovered. The code states:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC.

Public Resources Code

PRC 5097-5097.6 – Archaeological, Paleontological, and Historical Sites

PRC Section 5097-5097.6 outlines the requirements for cultural resource analysis prior to the commencement of any construction project on State lands. This section identifies that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the NAHC whenever Native American graves are found. Violations for taking or possessing remains or artifacts are felonies.

PRC Section 5097.5(a) states, in part, that:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

PRC 5097.9-5097.991 – Native American Heritage

PRC Section 5097.9-5097.991 identifies that no public agency, and no private party using or occupying public property or operating on public property, under a public license, permit, grant, lease, or contract made on or after July 1, 1977, shall in any manner whatsoever interfere with the free expression or exercise of Native American religion as provided in the U.S. Constitution and the California Constitution; nor shall any such agency or party cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require it. In addition, this section details the composition and responsibilities of the NAHC. The NAHC strives for the preservation and protection of Native American human remains, associated grave goods, and cultural resources. The NAHC has developed a strategic plan to assist the public, development community, local and federal agencies, educational institutions, and California Native Americans to better understand problems relating to the protection and preservation of cultural resources; and to serve as a tool to resolve these problems and create an awareness among lead agencies and developers of the importance of working with Native Americans (NAHC 2008). PRC

Sections 5097.91 and 5097.98 were amended by AB 2641 in 2006. This bill authorizes the NAHC to bring an action to prevent damage to Native American burial grounds or places of worship and establishes more specific procedures to be implemented in the event that Native American remains are discovered.

Senate Bill 18

SB 18, approved in 2004, amends the California Civil Code and the California Government Code, requiring cities and counties to contact and consult with California Native American tribes prior to adopting or amending any general plan or specific plan, or designating land as open space in order to preserve or mitigate impacts to specified Native American places, features and objects that are located within a city's or county's jurisdiction. SB 18 also requires cities and counties to hold in strict confidence any information about the specific identity, location, character or use of these resources. In 2005, OPR published Tribal Consultation Guidelines to guide cities and counties on the process of engaging in consultation in accordance with SB 18. The Native American Heritage Commission (NAHC) maintains a list of California Native American Tribes with whom cities and counties must consult pursuant to SB 18.

Assembly Bill 52

Assembly Bill 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on "tribal cultural resources" with significant environmental impacts (new PRC Section 21084.2).

Effective July 1, 2015, AB 52 amended CEQA to mandate consultation with California Native American tribes during the CEQA process to determine whether a proposed project may result in a significant impact on a tribal cultural resource, and that this consideration be made separately from cultural and paleontological resources.

PRC Section 21073 defines "California Native American tribes" as "a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

PRC Section 21074(a) provides the following definition of "tribal cultural resources" for the purpose of CEQA.

a. Sites, features, places, cultural landscapes [geographically defined in terms of the size and scope], sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    1) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

    2) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria A and B also meet the definition of a historical resource under CEQA, a tribal cultural resource may also require additional consideration as a historical resource. Tribal cultural resources may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their tribal cultural resources and heritage, AB 52 requires that CEQA lead agencies carry out consultation with tribes at the commencement of the CEQA process to identify tribal cultural resources. Furthermore, because a significant effect on a tribal cultural resource is considered a significant impact on the environment under CEQA, consultation is required to develop appropriate avoidance, impact minimization, and mitigation measures. Consultation is concluded (1) when the lead agency and tribes agree to appropriate mitigation measures to mitigate or avoid a significant effect; or (2) when a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]), whereby the lead agency uses its best judgement in requiring mitigation measures that avoid or minimize impact to the greatest extent feasible.

3.4.2.3 Regional/Local Regulations

City of Escondido Municipal Code

Article 40 of the City's Municipal Code (Historical Resources) establishes the City's Historic Preservation Committee, the Escondido Local Register of Historical Places, and the designation process for Escondido Local Landmarks. Any person may nominate a historical resource to the local register or for landmark designation; however, the application must be made to the planning division on forms provided by the City. In addition, requests for local landmark designation must include a letter signed by the property owner consenting to the initiation. Article 40 additionally establishes it as unlawful to tear down, demolish, construct, alter, remove or relocate any historical resource or any portion thereof that has been listed on the Escondido Historic Sites Survey, Local Register, designated as a Local Landmark, or located within a Historical Overlay District; or to alter any feature of without first obtaining a permit as outlined in Article 40, Section 33-798. This includes obtaining a Certificate of Appropriateness for any new construction, and/or alteration that would affect the exterior appearance of a historical resource listed on the local register, or located within an historical overlay district, including the back, sides, and street façade, even when a building permit is not otherwise required. Additional permits, as well as review by the planning commission, may also be required. Improvements and alterations to properties listed on the Escondido Historic Sites Survey outside an historical overlay district are also subject to staff administrative review to ensure that improvements and alterations do not preclude future listing in the local register. Further, Article 40 requires that all repairs, alterations, constructions, restorations or changes in use of applicable historical resources shall conform to the requirements of the State Historical Building Code and the SOI's Standards for Rehabilitation. Demolitions to such resources would require a permit acquired in accordance with Article 40, Sections 33-801, 33-802, and 33-803.

Article 55 of the City Municipal Code (Grading and Erosion Control) ensures that development occurs in a manner that protects the natural and topographic character and identity of the environment; the visual integrity of hillsides and ridgelines; sensitive species and unique geologic/geographic features; and the health, safety, and welfare of the general public by regulating grading on private and public property and providing standards and design criteria. Additionally, the article recommends that grading designs be sensitive to natural topographic, cultural, or environmental features, as well as mature and protected trees by ensuring the following features are preserved in permanent open space easements, or such other means: undisturbed steep slopes (over 35%); riparian areas, mitigation areas, and areas

with sensitive vegetation or habitat; unusual rock outcroppings; other unique or unusual geographic features; and significant cultural or historical features.

Article 65 of the City Municipal Code provides guidance regarding the permitted principal uses and structures within the Old Escondido Neighborhood area, defined as being bounded on the north by 5th Avenue, Chestnut Street on the east, 13th Avenue on the south, and South Escondido Boulevard on the west, but excluding properties fronting Escondido Boulevard and including the north side of 5th Avenue from Juniper to Date Streets.

Criteria for Local Register Listing or Local Landmark Designation

Prior to granting a resource Local Register or Historical Landmark status, the City Council will consider the definitions for historical resources and historical districts and will find that the resource conforms to one or more of the criteria listed below. A structural resource proposed for the Local Register will be evaluated against criteria numbered 1 through 7 and must meet at least two of the criteria; signs proposed will meet at least 1 of the criteria numbered 8 through 10; landscape features will meet criterion number 11; and archaeological resources will meet criterion number 12. Local Register resources proposed for Local Landmark designation will be evaluated against criterion number 13. The criteria are as follows:

1. Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state or nation;
2. Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
3. Escondido historical resources that are connected with a business or use that was once common but is now rare;
4. Escondido historical resources that are the sites of significant historic events;
5. Escondido historical resources that are 50 years old or have achieved historical significance within the past 50 years;
6. Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area or district;
7. Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type;
8. Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;
9. Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;
10. Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;
11. Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities;
12. Escondido archaeological site that has yielded, or may be likely to yield, information important in prehistory;

13. Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests. (Ord. No. 2000-23, § 4, 9-13-00; Ord. No. 2008-16, § 4, 7-16-08).

Criteria for Historical District Designation

The City Council may designate an area as a Historical District if it finds that the proposed historical district meets all of the following criteria:

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

City of Escondido General Plan

The General Plan includes the Resource Conservation Element. This element includes a number of goals and policies that address historic, cultural, and Tribal resources. Applicable goals and policies related to the proposed project are listed below. Refer to Section 3.10, Land Use and Planning for an analysis of proposed project consistency with City General Plan Resource Conservation Element goals and policies.

Historic and Cultural Resources Goal 5: Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.

Cultural Resources Policy 5.2: Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.

Cultural Resources Policy 5.3: Consult with appropriate organizations and individuals (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.

Cultural Resources Policy 5.4: Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.

Cultural Resources Policy 5.6: Review proposed new development and/or remodels for compatibility with the surrounding historic context.

San Diego County Local Register of Historical Resources

The purpose of the San Diego County Local Register of Historical Places is to develop and maintain "an authoritative guide to be used by state agencies, private groups, and citizens to identify the County's historical resources and to indicate which properties are to be protected, to the extent

prudent and feasible, from substantial adverse change." Sites, places, or objects that are eligible for listing in the NRHP or CRHR are automatically included in the San Diego County Local Register of Historical Places.

3.4.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 California Code of Regulations 15000 et seq.) has identified significance criteria to be considered for determining whether a project could have significant impacts on existing cultural resources.

An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences:

- **Threshold #1**: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- **Threshold #2**: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5,[1]
- **Threshold #3**: Cause a substantial adverse change in the significance of a Tribal Cultural Resource defined in Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of 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 Section 5020.1(k), or
    - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Section 5024.1(c). In applying the criteria set forth in Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.
- **Threshold #4**: Disturb any human remains, including those interred outside of dedicated cemeteries.

3.4.4 Project Impact Analysis

Archaeological Resources

Threshold 1: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

One previously unrecorded isolate early-stage biface preform (P-37-039446) was identified during the March 2021 pedestrian survey. The isolate is a Santiago Peak Volcanic biface preform. The surface is weathered and patinated. Preforms of this size and type have typically been associated with the San Dieguito or Paleoindian Period. It was located in the northwestern portion of the project area, less than

[1] Section 15064.5 of the CEQA Guidelines defines a historical resource as one that meets one or more of the following criteria: 1) Is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; or 2) Is included in a local register of historical resources or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code; or 3) Is determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California.

three meters from the backyard patio of the residence addressed as 2089 North Iris Lane. The artifact was found loose on top of the soil. Because the artifact was found so close to the house, archaeologists returned to the site on October 15, 202I to speak to the homeowner about the origins of the artifact. At that time, the isolated artifact (P-37-039446) was found to have been relocated to a picnic table and additional decorative rocks and artifacts, such as a sandstone metate, were present on the table. During that visit, it was determined that neither the isolated artifact (P337-039446), nor other artifacts and decorative rocks seen on the table, had originated on the project site and were acquired in Arizona near Lake Powell. This was consistent with the appearance of the sandstone metate. The brown rhyolite used for the biface preform was also more consistent with an Arizona source than a local one where brown is a rare color form. Based on this evidence, the results of the survey of the project area are negative for the presence of Native American cultural resources.

Surface visibility in the immediate vicinity was very good and no other artifacts were present beyond those belonging to the homeowner. While it is assumed that the artifact will be removed by the homeowner and not be impacted by the proposed project, it is possible that prehistoric cultural materials are present on the ground surface or buried within the project site that were not visible during the survey. Therefore, there is a potential for grading activities to impact unidentified archaeological resources. This represents a **potentially significant impact** (**Impact CR-1**) and mitigation is required.

- **Impact CR-1** - Due to grading and ground disturbing activities, the project has the potential to impact unidentified archeological resources on the project site.

Historical Resources

Threshold #2: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.[2]

As described above, the cultural resources survey identified four standing structures of historic age (2039 North Iris Lane, 2047 North Iris Lane, 2085 North Iris Lane, 2089 North Iris Lane) within the project area. None of these structures have been previously evaluated for eligibility to the California Register of Historical Resources. These structures are not associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage. The residential properties at 2039 North Iris Lane, 2047 North Iris Lane, 2085 North Iris Lane, and 2089 North Iris Lane are not associated with events significant in local history. They are also not associated with the lives of persons important to the history of San Diego County or its communities. The architects and builders are unknown, but the structures do not embody the distinctive characteristics of a type, period, San Diego County region, or method of construction, or represent the work of an important creative individual, or possesses high artistic values. The integrity of the structures has been compromised by additions and window replacements. The structures cannot yield information important in local history. Based on evaluation of the history and resources on the project site, and consideration of the ability of those resources to reflect the historic contexts with which they are

[2] Section 15064.5 of the CEQA Guidelines defines a historical resource as one that meets one or more of the following criteria: 1) Is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; or 2) Is included in a local register of historical resources or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code; or 3) Is determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California.

associated, the standing structures would not be eligible as individual historic resources for listing in the NRHP, CRHR, and City of Escondido Local Register of Historic Places. The buildings are not considered historical resources for the purposes of CEQA, and impacts on historic resources would be **less than significant**. No mitigation is required.

Tribal Resources

Threshold 3: Cause a substantial adverse change in the significance of a Tribal Cultural Resource defined in Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of 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 Section 5020.1(k), or**
- **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Section 5024.1(c). In applying the criteria set forth in Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.**

As described above, the San Pasqual Band of Mission Indians (April 26, 2021) indicated that the project was within their Traditional Use Area and requested additional information and consultation. The Viejas Band of Kumeyaay Indians (April 29, 2021) determined that the project site has cultural significance or ties to Viejas and requested a Kumeyaay cultural monitor be on site during ground disturbing activities. The City also conducted Tribal consultation per AB 52 and SB 18 for the proposed project. The City's consultation included outreach and information requests to five local Native American groups as identified by the Native American Heritage Commission, including Rincon Band of Luiseño Indians, San Luis Rey Band of Mission Indians, Mesa Grande Band of Mission Indians, San Pasqual Band of Mission Indians, and Soboba Band of Luiseño Indians. Per their request for formal consultation, the City met with representatives from the San Pasqual Band of Mission Indians, San Luis Rey Band of Mission Indians, and Rincon Band of Luiseño Indians. At the time of publication of this document, none of the tribes had identified any significant tribal resources on the proposed project site however, the potential for discoveries during grading exists and mitigation was requested for inadvertent discoveries.

As described above, one previously unrecorded isolate early-stage biface preform (P-37-039446) was identified during the pedestrian survey but was later determined to be part of a homeowner's collection and originates from Arizona near Lake Powell. Surface visibility in the immediate vicinity was very good and no other artifacts were present. However, it is possible that prehistoric cultural materials are present on the ground surface within the project site that were not visible during the survey. Therefore, as described above, there is a potential for grading activities to impact unidentified archaeological resources (**Impact CR-1**). Mitigation Measures are required to reduce potential impacts to unknown subsurface resources.

Human Remains

Threshold #4: Disturb any human remains, including those interred outside of dedicated cemeteries.

The cultural resources field survey conducted for the project did not identify any human remains or find any indications that they would be expected to be found on the project site. The NAHC was contacted to identify possible sacred lands within the proposed project site. No known sacred/burial

sites have been identified on the project site. Although unlikely, the discovery of unknown buried human remains during project construction is always a possibility. If human remains are encountered during project construction, there is a potential for a **significant impact** (**Impact CR-2**).

- **Impact CR-2** There is a potential for project construction activities to disturb previously unidentified human remains on the project site.

3.4.5 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for cultural resources varies depending on the type of resource with potential to be affected. Geographic scope can be the entire area within which the resource has the potential to occur. For the purpose of this EIR, the geographic scope for the cumulative analysis of cultural resources is the San Diego County region, including both incorporated and unincorporated areas.

Archaeological Resources

Cumulative projects in the San Diego County region have the potential to result in a cumulative impact associated with the loss of archaeological resources through development activities that could cause a substantial adverse change in the significance of an archaeological resource. Any cumulative projects that involve ground-disturbing activities have the potential to result in significant impacts on archaeological resources. These projects would be regulated by applicable federal, state, and local regulations; however, the loss of archaeological resources on a regional level may not be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural values and religious beliefs of applicable groups. Therefore, the cumulative destruction of significant archaeological resources from planned construction and development projects in the region would be cumulatively significant. Additionally, past projects involving development and construction have already affected archaeological resources in the region.

Because of the potential for impacts on unknown subsurface resources, there is potential for the proposed project to result in significant impacts on an archaeological resource. This significant impact would be mitigated to a level of less than significant with implementation of mitigation measures CR-1 through CR-10. Therefore, the proposed project would not significantly contribute to cumulative impacts on archaeological resources.

Historical Resources

Cumulative projects in the San Diego County region have the potential to result in a cumulative impact associated with the loss of historical resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Projects occurring within the geographic scope of this analysis have the potential to result in adverse impacts on historical resources from development activities. These projects are regulated by federal, state, and local regulations, and would be required to comply with these regulations. Even with regulations in place, however, individual historical resources still could be affected or degraded from demolition, destruction, alteration, or structural relocation as a result of new private or public development, or redevelopment associated with cumulative projects.

The structures on the project site are not considered historical resources. Therefore, the proposed project would not contribute to a cumulative impact on historical resources.

Tribal Resources

Cumulative projects located in the San Diego County region have the potential to result in a cumulative impact associated with the loss of tribal resources through development activities that could cause a substantial adverse change in the significance of a tribal resource. Any cumulative projects that involve ground-disturbing activities have the potential to result in significant impacts on tribal resources. These projects would be regulated by applicable federal, state, and local regulations; however, the loss of tribal resources on a regional level may not be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural values and religious beliefs of applicable groups. Therefore, the cumulative destruction of significant tribal resources from planned construction and development projects in the region would be cumulatively significant. Additionally, past projects involving development and construction have already affected tribal resources in the region.

Although no tribal resources have been identified on the project, there is potential for the proposed project to result in significant impacts on an unknown subsurface tribal resource. This significant impact would be mitigated to a level of less than significant with implementation of mitigation measures CR-1 through CR-10. Therefore, the proposed project would not significantly contribute to cumulative impacts on tribal resources.

Human Remains

Cumulative projects in the San Diego County region have the potential to result in impacts associated with human remains due to grading, excavation, or other ground-disturbing activities. Projects that may result in significant impacts from ground-disturbing activities include the development of land uses as designated in the general plans of surrounding jurisdictions. If human remains are encountered during project development, cumulative projects would be required to comply with the Native American Graves Protection and Repatriation Act, PRC Section 5097.9 - 5097.991, the California Native American Graves Protection and Repatriation Act, and Health and Safety Code Section 7050.5. On a regional level, however, the disturbance of human remains that are also considered archaeological resources may not be adequately mitigated through methods specified in these regulations, as their value may also lie in cultural mores and religion beliefs of applicable groups. Therefore, the cumulative disturbance of human remains by construction and development within the region is considered a cumulatively significant impact. Additionally, past projects involving development and construction have already affected human remains within the region.

Compliance with Health and Safety Code Section 7050.5 and MM-CR-8 would prevent potentially significant impacts in the unlikely event that human remains are encountered during construction. Therefore, the contribution of the proposed project to this cumulative impact would not be considerable.

3.4.6 Mitigation Measures

- Impact CR-1 Archaeological Resources

MM-CR-1 Prior to the issuance of a grading permit, the Applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a Pre-Excavation Agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe"). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources,

and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures MM-CR-2 through MM-CR-10, and the following information:

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

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

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

MM-CR-4 During the initial grubbing, site grading, excavation or disturbance of the ground surface (including both on- and off-site improvement areas), the qualified

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

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

MM-CR-6 If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c), the archaeologist shall immediately notify the City of said discovery. The qualified archaeologist, in consultation with the City, the consulting TCA Tribe(s), and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and be submitted to the City for review and approval. If the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) though (c), appropriate treatment measures will be implemented. Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

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

M-CR-8 As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to

their satisfaction. The analysis of the remains shall only occur on site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.

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

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

- Impact CR-2 Human Remains

  Please see mitigation measure MM-CR-8, above.

3.4.7 Conclusion

Historical Resources

The existing structures on the proposed project site are not eligible for listing in the NRHP or CRHR and are not considered to be historic resources for the purposes of CEQA. Therefore, impacts associated with a substantial adverse change in the significance of a known historical resource would be less than significant.

Archaeological Resources

Given the potential for unknown prehistoric cultural materials on the ground surface or buried within the project site, implementation of the proposed project has the potential to result in impacts on buried archaeological resources. This represents a potentially significant impact. Implementation of mitigation measures MM-CR-1 through MM-CR-8 would reduce this impact to a less-than-significant level.

Specifically, implementation of these mitigation measures provides for the presence of archaeological and Native American monitors during ground disturbing activities that would be able to identify any

previously unidentified cultural and/ or historical resources, to prevent inadvertent disturbance of any intact cultural deposits that may be present. Should any resources be identified, implementation of MM-CR-1 through MM-CR-10 would ensure proper handling and treatment of such resources by providing for a proper evaluation to determine whether additional archaeological work is necessary. To further ensure impacts to Native American archaeological resources are protected, the mitigation provides additional protections for significant resources, and describes the process for proper treatment and handling to ensure impacts are minimized. Implementation of MM-CR-1 through MM-CR-10 would reduce potential project-level impacts to tribal cultural resources to **below a level of significance.**

Tribal Resources

Based upon the cultural resources study prepared for the project (LME 2021) and consultation with local tribes pursuant to SB 18 and AB 52, the project site does not contain any known tribal cultural resource that are listed or eligible for listing in the CRHR or in a local register of historical resources. However, it is possible that prehistoric cultural materials are present on the ground surface within the project site that were not visible during the survey. Therefore, the proposed project has the potential to disturb unidentified archeological resources during project grading (Impact CR-1). MM-CR-1 through MM-CR-4 provide for the presence of archaeological and Native American monitors during ground disturbing activities that would be able to identify any previously unidentified cultural resources, to prevent inadvertent disturbance of any intact cultural deposits that may be present. Should any resources be identified, implementation of MM-CR-5 through MM-CR-10 would ensure proper handling and treatment of such resources by providing for a proper evaluation to determine whether additional archaeological work is necessary. MM-CR-5 through MM-CR-10 provide additional protections for significant resources and describe the process for proper treatment and handling to ensure impacts are minimized. Implementation of MM-CR-1 through MM-CR-10 would reduce potential project-level impacts to tribal cultural resources to **below a level of significance.**

Human Remains

If human remains are encountered during construction, the find would be handled in accordance with mitigation measure MM-CR-8 and the California Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant. The most likely descendant shall complete the inspection of the site within 24 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Compliance with California Health and Safety Code Section 7050.5 would prevent potentially significant impacts in the unlikely event that human remains are encountered during construction. Therefore, the potential for impacts associated with the disturbance of human remains would be **mitigated to below a level of significance.**

Figure 3.4-1. 2039 North Iris Lane

Figure 3.4-2. 2047 North Iris Lane

Figure 3.4-3. 2085 North Iris Lane

Figure 3.4-4. 2089 North Iris Lane

3.5 Energy

This section describes the existing setting of the project site with respect to energy use and conservation, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

Appendix G and Appendix F of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) discusses the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy to ensure that energy implications are considered in project-related decision-making processes. As such, this section analyzes the energy impacts of the proposed project. Specifically, this section summarizes the existing conditions in the project area, discusses the regulatory framework, and discloses estimated energy use during the construction and operational phases of the proposed project. This analysis considers the electricity, natural gas, and transportation fuel (petroleum) demand of the proposed project.

Information in this section is based on the proposed project's Greenhouse Gas Assessment prepared by LDN Consulting (LDN 2002b), which is included as Appendix H of this EIR.

3.5.1 Existing Conditions

The environmental setting for the proposed project related to electricity, natural gas, and petroleum, including associated service providers, supply sources, and estimated consumption, is discussed below.

Electricity

Electricity usage in California for different land uses varies by the types of uses in a building, types of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita has remained stable for more than 30 years, and the national average has steadily increased (CEC 2014).

San Diego Gas & Electric (SDG&E) provides electric services to 3.6 million customers through 1.4 million electric meters located in a 4,100-square-mile service area that includes San Diego County (County) and southern Orange County (SDG&E 2021). SDG&E is a subsidiary of Sempra Energy and would provide electricity to the proposed project. According to the California Public Utilities Commission (CPUC), SDG&E customers consumed approximately 19,169 million kilowatt-hours (kWh) of electricity in 2015 (CPUC 2016). SDG&E is forecasted to reach 49% renewable energy in 2021, 98% of which will be from long-term contracts (SDG&E 2018).

Based on recent energy supply and demand projections in California, statewide annual peak electricity demand is projected to grow an average of 890 megawatts per year for the next decade, or 1.4% annually, and consumption per capita is expected to remain relatively constant at 7,200– 7,800 kWh per person (CEC 2014).

In San Diego County, the California Energy Commission (CEC) reported an annual electrical consumption of approximately 19 billion kWh total with 6.6 billion kWh for residential use and 12.4 billion kWh for non-residential use in 2019 (CEC 2019).

Natural Gas

The CPUC regulates natural gas utility rates and services provided by Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCal Gas), San Diego Gas & Electric Company (SDG&E), Southwest Gas and several smaller natural gas utilities. SDG&E provides natural gas service to the Counties of San Diego and Orange and would provide natural gas to the proposed project. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system (CPUC 2021).

California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4,740 million cubic feet per day (MMCFD) of gas to their customers, on average, under normal weather conditions (CPUC 2021).

The majority of natural gas utility customers in California are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35% (CPUC 2021).

Most of the natural gas used in California comes from out-of-state natural gas basins. In 2017, for example, California utility customers received 38% of their natural gas supply from basins located in the U.S. Southwest, 27% from Canada, 27% from the U.S. Rocky Mountain area, and 8% from production located in California. The state does not receive liquefied natural gas (LNG) supplies. Biogas (e.g., from wastewater treatment facilities or dairy farms) is just beginning to be delivered into the gas utility pipeline systems, and the State has been encouraging its development (CPUC 2021).

California’s regulated utilities do not own any natural gas production facilities. All natural gas sold by these utilities must be purchased from suppliers and/or marketers. The price of natural gas sold by suppliers and marketers was deregulated by the Federal Energy Regulatory Commission in the mid-1980s and is determined by market forces. However, CPUC decides whether California’s utilities have taken reasonable steps to minimize the cost of natural gas purchased on behalf of its core customers (CPUC 2021).

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that service, the CPUC may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers (CPUC 2021).

The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while

core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines (CPUC 2021).

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently (CPUC 2021).

In order to properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California (CPUC 2021).

Petroleum

There are more than 35 million registered vehicles in California, and those vehicles consume an estimated 18 billion gallons of fuel each year (CEC 2017). Gasoline and other vehicle fuels are commercially provided commodities and would be available to the proposed project through commercial outlets.

Petroleum currently accounts for approximately 92% of California's transportation energy consumption. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled (VMT). Market forces have driven the price of petroleum products steadily upward over time, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

Largely as a result of and in response to these multiple factors, gasoline consumption within the state has declined in recent years, and availability of other alternative fuels/energy sources has increased. The quantity, availability, and reliability of transportation energy resources have increased in recent years, and this trend may likely continue and accelerate. Increasingly available and diversified transportation energy resources act to promote continuing reliable and affordable means to support vehicular transportation within the state.

Existing Infrastructure

Electricity and natural gas service is currently provided to the project site by SDG&E. SDG&E would serve the proposed development for electric service. The project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project would underground five existing SDG&E power poles along North Iris Lane. Four of the poles are along the project frontage and one pole is located approximately 60 feet north of the project site on North Iris Lane. The project applicant will coordinate with SDG&E for the undergrounding of these poles. If the project utilizes natural gas, it would connect to the existing gas line within North Iris Lane.

3.5.2 Regulatory Framework

Federal, state, and local agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation, the U.S. Department of Energy, and the U.S. Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. On the state level, CPUC and CEC are two agencies with authority over different aspects of energy. Relevant federal, state, and local energy-related regulations are summarized below. This information helps to place the impact analysis within its proper regulatory context

3.5.2.1 Federal Regulations

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased CAFE standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum. The U.S. Environmental Protection Agency (EPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1)

required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as "RFS2" and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel, and set separate volume requirements for each one.
- EISA required the U.S. Environmental Protection Agency to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Federal Vehicle Standards

In August 2016, EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018–2027 for certain trailers, and model years 2021–2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons (MT) and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

On September 27, 2019, EPA and NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (84 Fed. Reg. 51,310), which became effective November 26, 2019. The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. The Part One Rule also impacted some of the underlying assumptions in the California Air Resources Board (CARB) EMFAC2014 and EMFAC2017 models for criteria air pollutant emissions from gasoline light-duty vehicles, and CARB released off-model adjustment factors for EMFAC's criteria air pollutants estimation on November 20, 2019, primarily for use in federal Clean Air Act conformity demonstration analyses. This issue is evolving as California and 22 other states, as well as the District of Columbia and two cities, filed suit against the EPA over the vehicle waiver revocation on November 15, 2019, and a petition for reconsideration of the rule was filed on November 26, 2019, by California and 22 other states, the District of Columbia, and four cities.

3.5.2.2 State Regulations

The discussion below focuses primarily on those policies, regulations, and laws that directly pertain to energy-related resources. Refer to Section 3.7, Greenhouse Gas Emissions, of this EIR, which addresses various policies, regulations, and laws targeted to the reduction of GHG emissions that are expected to achieve co-benefits in the form of reduced demand for energy-related resources and enhanced efficiencies in the consumption of energy-related resources.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. In 2005, a second Energy Action Plan was adopted by the CEC and CPUC to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based in part on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an "update" that examines the state's ongoing actions in the context of global climate change.

Senate Bill 1078 (2002)

This bill established the California RPS Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

Senate Bills 107 (2006), X1-2 (2011), 350 (2015), and 100 (2018)

Senate Bill (SB) 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% shall come from renewables; by December 31, 2016, 25% shall come from renewables; and by December 31, 2020, 33% shall come from renewables.

SB 350 (2015) requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030 be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the 60% RPS in 2030. Therefore, any project's reliance on nonrenewable energy sources would also be reduced.

Assembly Bill 1007 (2005)

AB 1007 (2005) required the CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). The CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with the other state, federal, and local agencies. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, CARB prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiencies and the use of renewable resources and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 3.7 of this EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies. The 2016 Title 24 building energy efficiency standards, which became effective on January 1, 2017, further reduce energy used in the state. In general, single family homes built to the 2016 standards are anticipated to use approximately 28% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards (CEC 2015).

The 2019 Title 24 standards were approved and adopted by the California Building Standards Commission in December 2018. The 2019 standards became effective January 1, 2020. The standards require that all low-rise residential buildings shall have a photovoltaic system meeting the minimum qualification requirements such that annual electrical output is equal to or greater than the dwelling's annual electrical usage. Notably, net energy metering rules limit residential rooftop solar generation to produce no more electricity than the home is expected to consume on an annual basis. Single-family homes built with the 2019 standards will use about 7% less energy due to energy efficiency measures versus those built under the 2016 standards, while new nonresidential buildings will use about 30% less energy mainly to lighting upgrades (CEC 2018).

The 2022 Building Energy Efficiency Standards (Energy Code) will improve upon the 2019 Energy Code for new construction of, and additions and alterations to, residential and nonresidential buildings. Workshops will be held to present revisions and obtain public comment. Proposed standards will be adopted in 2021 with an effective date of January 1, 2023. The CEC updates the standards every three years.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen, and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective on January 1, 2017. The standards require mandatory reduction in indoor and outdoor water use, diversion of demolition waste, mandatory inspections of energy systems, inclusion of electric vehicle charging stations for designated parking spaces and use of low-pollutant-emitting exterior and interior finish materials. The CALGreen 2019 standards will continue to improve upon the 2016 CALGreen standards and will go into effect on January 1, 2020.

Integrated Energy Policy Report

Senate Bill 1389 (SB 1389, Bowen and Sher, Chapter 568, Statutes of 2002) requires the California Energy Commission to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety. (Pub. Res. Code § 25301(a)).

The California Energy Commission adopts an Integrated Energy Policy Report (IEPR, pronounced eye'-per) every two years and an update every other year. The most current report is the *2021 Integrated Energy Policy Report Update*.

State Vehicle Standards

AB 1493 requires CARB to set GHG emission standards for passenger vehicles and EO S-1-07 sets a declining Low Carbon Fuel Standard to reduce the carbon intensity of California passenger vehicle fuels. The Advanced Clean Cars Program is an emissions control program to reduce smog-forming pollution, GHG emissions, promote clean cars, and provide fuels for clean cars. EO B-16-12 supports and facilitates development and distribution of Zero Emissions Vehicles. As explained under the "Federal Vehicle Standards" description above, EPA and NHTSA approved the SAFE Vehicles Rule Part One, which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. The EPA rule is the subject of pending legal challenges. Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of implementation of these standards is a reduced demand for petroleum-based fuels.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions reduction mandates. As codified in California Government Code, Section 65080, SB 375 requires metropolitan planning organizations (San Diego Association of Governments) to include a Sustainable Communities Strategy in its regional transportation plan. The main focus of the Sustainable Communities Strategy is to plan for growth in a fashion that will ultimately reduce GHG

emissions, but the strategy is also a part of a bigger effort to address other development issues within the general vicinity, including transit and VMT, which influence the consumption of petroleum-based fuels.

3.5.2.3 Regional/Local Regulations

SDG&E Long-Term Procurement Plan

SDG&E's Conforming Portfolio identifies a need for approximately 700 gigawatt-hours of incremental renewable power in addition to the assumed increases in energy efficiency and behind-the-meter solar, to meet the 2030 planning target (approximately 4% of the total energy in the portfolio) (SDG&E 2018). SDG&E's Conforming Portfolio demonstrates that SDG&E has reduced its GHG emissions in the early years of the planning period, reflecting SDG&E's current position in relation to its RPS targets, with approximately 45% of its current energy mix coming from delivering renewable resources in 2018 as compared to an RPS requirement of 29%, its aggressive adoption of energy storage, and no coal resources. SDG&E is fully compliant with RPS and long-term contracting requirements. SDG&E continues to procure to meet resource-specific renewable procurement mandates, as required, but does not expect to procure additional resources for RPS compliance purposes until after 2030. SDG&E is forecasted to reach 49% renewable energy in 2021, 98% of which will be from long-term contracts (SDG&E 2018).

City of Escondido General Plan

The *City of Escondido General Plan* (City of Escondido 2012a) includes various policies related to reducing GHG emissions and the co-benefit of reducing energy consumption. Applicable policies include the following:

Mobility and Infrastructure Energy Goal 6: An increased use of renewable energy sources, and improved energy conservation and efficiency.

Energy Policy 16.2: Continue to work with local utility providers to ensure that adequate electricity and natural gas services and facilities are available for new and existing development.

Energy Policy 16.3: Implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities.

Energy Policy 16.4: Encourage site and building design that reduces exterior heat gain and heat island effects (tree planting, reflective paving materials, covered parking, cool roofs, etc.).

Energy Policy 16.5: Require, to the extent feasible, building orientations and landscaping that use natural lighting to reduce energy demands.

Energy Policy 16.6 Evaluate and amend appropriate codes and ordinances in order to facilitate and encourage the installation of renewable energy systems and facilities (solar, wind, hydro-power, geothermal, and bio-mass), where appropriate, for all development.

Energy Policy 16.13 Require new utility lines to be constructed underground, and along existing utility corridors, when feasible.

Resource Conservation Air Quality and Climate Protection Goal 7: Improved air quality in the city and the region to maintain the community's health and reduce greenhouse gas emissions that contribute to climate change.

Air Quality and Climate Protection Policy 7.2: Reduce regional greenhouse gas emissions through the following measures including, but not limited to:

a. Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.);

b. Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques;

c. Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities;

d. Encouraging the use of non-polluting alternative energy systems.

City of Escondido Climate Action Plan

The City of Escondido developed an update to the 2013 Climate Action Plan (CAP) (City of Escondido 2021). The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), and Guidance for Demonstrating Consistency with the City of Escondido CAP for Discretionary Projects Subject to CEQA Memorandum in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

Per the CAP, emissions in the energy category are generated through residential and non-residential electricity and natural gas use. Electricity and natural gas accounted for 27 percent and 12 percent of the City's 2012 emissions inventory, respectively. With a combined emissions contribution of 39 percent, the energy category is the second largest contributor to overall City emissions. Legislative reductions from State energy efficiency and renewable energy programs will contribute to reducing emissions by increasing the amount of utility supplied renewable energy and improving energy efficiency of new buildings. At the local level, GHG emissions reductions would be achieved by improving energy efficiency of existing buildings and improving energy efficiency of new developments beyond State requirements. GHG reductions would also occur from increasing the amount of renewable energy generated locally while reducing the amount of non-renewable energy consumed. Initiatives directed under the energy category rely on efforts by local utilities, organizations, and agencies, with participation from the community.

The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. Strategies and measures related to energy include the following:

Strategy 1: Increase the Use of Zero-Emission or Alternative Fuel Vehicles

Measure T-1.3: Adopt an Ordinance to Require Electric Vehicle Charging Stations in Development. Adopt an ordinance, effective in 2023, that requires Level 2 or better EV charging stations to be installed in a minimum of ten percent of total parking spaces provided in new multi-family and new and existing commercial developments.

Strategy 4: Increase Building Energy Efficiency

Measure E-4.1: Require New Residential Developments to Install Alternatively- Fueled Water Heaters Adopt an ordinance, effective in 2023, requiring all new single-family and multi-family residential projects and significant remodels to install electric heat pump water heaters.

Measure E-4.2: Require New Multi-Family Residential Development to Install Electric Cooking Appliances. Adopt an ordinance, effective in 2023, requiring all new multi-family residential units and significant remodels to install only electric cooking appliances.

3.5.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts related to energy. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1**: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- **Threshold #2**: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.4 Project Impact Analysis

This section provides a project-level impact analysis for the two thresholds related to energy.

3.5.4.1 Energy Consumption

Threshold #1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Electricity

Construction Use

The amount of electricity used during construction would be minimal. Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside construction trailers and heating, ventilation, and air conditioning), and electrically powered hand tools would be provided by SDG&E. The majority of the energy used during construction would be from petroleum. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be **less than significant.**

Operational Use

At full build-out, the proposed project's operational phase would require electricity for operating the residences. The California Emissions Estimator Model (CalEEMod), version 2020.4.0, default values for electricity consumption for the residential land use were applied. Emission factors used in the model are included in the GHG report in Appendix H (LDN 2022b). The model also incorporates project design features including:

- LED technology for all indoor and outdoor lighting;
- Provision of separate waste containers to allow for simpler material separations or the project would pay for a waste collection service that recycles the materials in accordance with AB 341 to achieve a 75% waste diversion. All green waste will be diverted from landfills and recycles as mulch;
- Installation of ENERGY STAR qualified appliances;
- Installation of 2 kW of solar per units or roughly 204 KW of solar in total;
- Installation of electric heat pump water heaters in all units; and
- Installation of hearth options would not be permitted.

The proposed project is estimated to have a total electrical demand of approximately 379,297 kWh per year, which is based on CalEEMod. The project includes various on-site features and measures to reduce the proposed project's energy consumption. Further, the proposed project would be required to be consistent with appropriate mandatory project design features in the City's Climate Action Plan Consistency Checklist that would reduce operational electricity consumption (details are provided in Appendix H of this EIR) and would-be built-in compliance with Title 24 requirements applicable at that time. Based on the 2019 standards, homes built under the 2019 Title 24 standards would use about 53% less energy than those under the 2016 Title 24 standards because the 2019 standards require solar photovoltaic systems for new homes. On the residential side, the standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building thermal envelope (CEC 2018). Thus, environmental impacts related to operational electricity use would be **less than significant.**

Natural Gas

Construction Use

Natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the petroleum subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect on the environment; therefore, impacts would be **less than significant.**

Operational Use

No hearths or woodstoves would be included in the project design. Any minor amounts of natural gas that may be consumed during operation would be negligible and would not have an adverse effect on the environment; therefore, impacts would be less than significant. Further, the proposed project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Prior to project approval, the applicant would ensure that the proposed project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. The proposed project would implement energy efficiency design features and would not result in a wasteful use of energy. Therefore, environmental impacts from natural gas consumption would be **less than significant**

Petroleum

Construction Use

Petroleum would be consumed throughout construction of the proposed project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the project site, would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during each phase of construction. CalEEMod was used to estimate construction equipment usage. Results are included in Appendix H. Based on that analysis, over all phases of construction, diesel-fueled construction equipment would operate for an estimated 19,314 hours, as summarized in **Table 3.5-2.**

Table 3.5-2 Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use	Number of Days	Total
Demolition	24	20	480
Site Preparation	56	10	560
Grading	48	20	960
Paving	48	20	960
Building Construction	68	230	15,640
Architectural Coating	6	39	234
Total			**18,834**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H).

Fuel consumption from construction equipment was estimated by converting the total CO2 emissions from each construction phase to gallons using conversion factors for CO2 to gallons of gasoline or diesel. Construction is estimated to begin at the end of 2022 and continue through 2023. The conversion factor for gasoline is 8.78 kilograms (kg) per metric ton CO2 per gallon, and the conversion factor for diesel is 10.21 kg per metric ton CO2 per gallon (The Climate Registry 2018). The estimated diesel fuel use from construction equipment is shown in Table 3.5-3.

Table 3.5-3 Construction Equipment Diesel Demand

Phase	Equipment CO2 (MT)	Kg CO2/ Gallon	Gallons
Demolition	12.6454	10.21	1,238.53
Site Preparation	16.7197	10.21	1,637.58

Phase	Equipment CO2 (MT)	Kg CO2/ Gallon	Gallons
Grading	26.0547	10.21	2,551.88
Paving	20.0276	10.21	1,961.57
Building Construction	266.4993	10.21	26,101.79
Architectural Coating	4.9788	10.21	487.64
Total			**33,978.99**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H).
Notes: CO_2 = carbon dioxide;
kg = kilogram;
MT = metric ton
1 MT = 1,000 kg

Fuel consumption from worker and vendor trips is estimated by converting the total CO_2 emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, and vendor/hauling vehicles are assumed to be diesel fueled. Calculations for total worker, vendor, and hauler fuel consumption are provided in **Tables 3.5-4, 3.5-5, and 3.5-6.**

Table 3.5-4 Construction Worker Vehicle Gasoline Demand

Phase	Vehicle CO_2 (MT)	Kg CO_2/ Gallon	Gallons
Demolition	0.5399	8.78	61.49
Site Preparation	0.6074	8.78	69.18
Grading	1.0123	8.78	115.30
Paving	1.0123	8.78	115.30
Building Construction	86.3568	8.78	9,835.63
Architectural Coating	2.7845	8.78	317.14
Total			**10,514.03**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H).
Notes: CO_2 = carbon dioxide;
kg = kilogram;
MT = metric ton
1 MT = 1,000 kg

Table 3.5-5 Construction Vendor Truck Diesel Demand

Phase	Vehicle CO_2 (MT/YR)	Kg CO_2/ Gallon	Gallons
Building Construction	77.0998	10.21	7,551.4
Total			**7,551.4**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H).
Notes: CO_2 = carbon dioxide;
kg = kilogram;
MT = metric ton
1 MT = 1,000 kg

Table 3.5-6 Construction Haul Truck Diesel Demand

Phase	Vehicle CO_2 (MT)	Kg CO_2/ Gallon	Gallons
Demolition	37.1681	10.21	3,640.36
Site Preparation	23.9770	10.21	2,348.38
Grading	47.9164	10.21	4,693.09
Total			**10,681.83**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H).
Notes: CO_2 = carbon dioxide;
kg = kilogram;
MT = metric ton
1 MT = 1,000 kg

As shown in Tables 3.5-4 through 3.5-6, the proposed project is estimated to consume a total of 28,747.26 gallons of petroleum from worker vehicle, vendor truck, and haul truck trips during the construction phase. By comparison, California's estimated gasoline use was approximately 16 billion gallons of gasoline in 2016 (CARB 2018). The proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. Furthermore, the project's construction practices would be typical (i.e., not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuels would be required). Therefore, because petroleum use during construction, including construction of the proposed project, would be temporary and minimal and would not be wasteful or inefficient, **impacts would be less than significant.**

Operational Use

The majority of fuel consumption resulting from the proposed project's operational phase would be attributable to the use of resident motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by residents, visitors, and employees. Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of VMT as a result of project operation. As reported in the greenhouse gas study (Appendix H), the annual VMT attributable to the proposed project is expected to be approximately 1,318,935 VMT per year. Similar to construction worker and vendor trips, fuel consumption was estimated by converting the total CO_2 emissions from each land use type (410.4628 MT/yr) to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Based on the annual fleet mix provided in

CalEEMod, 93% of the fleet range from light-duty to medium-duty vehicles and motorcycles were assumed to run on gasoline. The remaining 7% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses/recreational vehicles, which were assumed to run on diesel.

Calculations for annual mobile-source fuel consumption are provided in **Table 3.5-7**.

Table 3.5-7 Mobile Source Fuel Consumption - Operation

Fuel	Vehicle CO_2 (MT)	Kg CO_2/ Gallon	Gallons
Gasoline	381.7304	8.78	43,477.27
Diesel	28.7324	10.21	2,814.14
Total	**410.4628**		**46,291.41**

Source: LDN 2022b, GHG Assessment, Attachment A- CalEEMod Emission Model (Appendix H1).
Notes: CO_2 = carbon dioxide;
kg = kilogram;
MT = metric ton
1 MT = 1,000 kg

As shown in Table 3.5-7, mobile sources from the proposed project would result in approximately 43,477.27 gallons of gasoline per year and 2,814.14 gallons of diesel consumed per year. By comparison, California as a whole consumed approximately 16 billion gallons of petroleum in 2016 (CARB 2018) and the County was expected to use 2.0 billion gallons of petroleum per year for transportation in 2020 (Caltrans 2009).

Over the lifetime of the proposed project, the fuel efficiency of the vehicles being used by residents is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emissions vehicles in California (CARB 2013).

The California Air Pollution Control Officers Association (CAPCOA) has developed methodologies for quantifying the emission reductions associated with numerous mitigation measures (CAPCOA 2010). Several of the measures would also reduce air pollutant emissions that are related to land use and transportation planning. The project includes installation of sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 feet) which will improve pedestrian network connectivity for the neighborhood. Also, the project includes the design features listed above, including installation of one EV charging station in each garage location and three EV charging stations in common area parking.

In summary, although the proposed project would increase petroleum use during operation, the use would be a small fraction of the statewide use and, due to efficiency increases, diminish over time. Given these considerations, petroleum consumption associated with the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

3.5.5 Conflict with Renewable Energy Plans

Threshold #2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would follow applicable energy standards and regulations during construction and would be built and operated in accordance with all existing, applicable building regulations at the time of construction. Furthermore, the proposed project would be consistent with all actions in the CAP Consistency Checklist as discussed in Appendix H of this EIR. For the reasons stated, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

3.5.6 Cumulative Impact Analysis

Potential cumulative impacts on energy would result if the proposed project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, would not achieve building energy efficiency standards, or would result in the unnecessary use of energy during construction and/or operation. The cumulative projects within the areas serviced by the energy service providers would be applicable to this analysis; this includes existing aging structures that are energy inefficient. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve substantial ongoing energy use.

As described previously, the proposed project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary use of energy due to various design features and adherence to applicable requirements. Similar to the proposed project, the cumulative projects would be subject to CALGreen, which provides energy efficiency standards for commercial and residential buildings. CALGreen would implement increasingly stringent energy efficiency standards that would require the proposed project and the cumulative projects to minimize the wasteful and inefficient use of energy. In addition, cumulative projects would be required to meet or exceed the Title 24 building standards, further reducing the inefficient use of energy. Future development would also be required to meet even more stringent requirements, including the objectives set in the AB 32 Scoping Plan. Furthermore, various federal and state regulations would serve to reduce the transportation fuel demand of cumulative projects. In consideration of cumulative energy use, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Thus, the proposed project would not contribute to a cumulative impact to the wasteful or inefficient use of energy. As such, the proposed project would not result in a cumulatively considerable contribution to a potential cumulative impact. **Impacts are less than significant**

3.5.7 Mitigation Measures

Based upon the analysis presented in sections 3.5.4 and 3.5.5, energy impacts would be less than significant; therefore, no mitigation measures are required.

3.5.8 Conclusion

Energy Consumption

The proposed project would comply with regulatory requirements and building standards. As such, the proposed project would not result in the wasteful or inefficient use of electricity or natural gas, and impacts would be **less than significant**.

Conflict with Renewable Energy Plans

The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing energy consumption, including the City's General Plan policies. As a result, impacts would be **less than significant.**

3.6 Geology and Soils

This section of the Environmental Impact Report (EIR) describes the existing soils on the proposed project site and analyzed the potential physical environmental impacts to people and property related to underlying soil characteristics. General information in this section is taken from the Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report (General Plan Program EIR) (City of Escondido 2012b) unless otherwise referenced. Project-specific information is from the Geotechnical Investigation prepared by GEOCON Incorporated (GEOCON 2021) and the Seismic Refraction Study prepared by Atlas Technical Consultants, LLC (ATC 2021). These reports are included as Appendices G1 and G2.

3.6.1 Existing Conditions

3.6.1.1 Regional Geologic Setting

The project site is situated in the Peninsular Ranges geomorphic province. The Peninsular Ranges province is one of the largest geomorphic units in western North America. It extends basically from the point of contact with the Transverse Ranges geomorphic province, southerly to the tip of Baja California. This province varies in width from about 30 to 100 miles. It is bounded on the west by the Pacific Ocean, on the south by the Gulf of California, and on the east by the Colorado Desert Province.

The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. Several major fault zones are found in this province. The Elsinore Fault zone and the San Jacinto Fault zone trend northwest-southeast and are found in the near middle of the province. The San Andreas Fault zone borders the northeasterly margin of the province.

United States Geological Survey maps (2016) indicate that there are no mapped Quaternary faults crossing or tending toward the project site. In addition, the site is not located with a currently established Alquist- Priolo Earthquake Fault Zone. No faults are shown presently in the immediate site vicinity on the maps reviewed for the area of the project site. The project site is located in an area geologically mapped to be underlain by Cretaceous-age granitic bedrock (GEOCON 2021).

3.6.1.2 Topography

Elevations range from approximately 705 feet Above Mean Sea Level (AMSL) in the southeast portion of the site to 735 feet AMSL in the northwest corner. Topographically, the property gently slopes to the south. A natural drainage with shallow perched groundwater crosses the southern portion of the property and discharges into a culvert beneath North Iris Lane.

3.6.1.3 Geotechnical/Soil Conditions

The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. Currently one existing residence on the project site, 2089 North Iris Lane, is served by the city for sewer service. The other three residents have onsite septic.

As part of the geotechnical investigation, GEOCON used the following methods:

- Review of aerial photographs, readily available published and unpublished geologic literature, and project plans;
- Review of project plans.

- Excavation of 12 exploratory trenches using a rubber tire backhoe to evaluate the general extent and condition of surficial deposits;
- Performance of laboratory tests on selected soil samples to evaluate the physical characteristics for engineering analysis;
- Performance of seven seismic P-wave refraction traverses by Atlas Technical Consultants to evaluate the rippability characteristics in areas of granitic rock; and
- Performance of four infiltration test in the proposed basin location to be utilized during storm water management design and providing storm water management guidelines in accordance with the City of Escondido Storm Water Standards.

Soil Types

Three surficial soil types and one geologic formation were encountered during the geotechnical field investigation (GEOCON 2021). The surficial soil consists of undocumented fill, alluvium, and colluvium. The formational unit is the Cretaceous-age granitic rock. Each of the surficial soil types and geologic unit encountered are described below in order of increasing age.

Undocumented Fill (Qudf)

Although not encountered during the field investigation, undocumented fill is expected beneath the existing residences. This deposit is estimated to be approximately five-foot-thick or less. Any undocumented fill encountered is considered unsuitable in its present condition and will require removal and compaction for support of structural fill and settlement-sensitive structures.

Alluvium (Qal)

Alluvial soils were encountered in exploratory Trenches T-8 through T-12 along the southern portion of the property. These deposits vary in thickness from approximately three to 12-feet-thick and generally consist of loose to medium dense, damp to saturated, silty fine- to coarse-grained sand. The upper portions of the alluvial deposits are poorly consolidated and potentially compressible and will require removal and compaction during grading. Based on laboratory testing, the lower portion of the alluvial deposits are generally suitable in their present condition for support of structural fill and settlement-sensitive structures (GEOCON 2021).

Colluvium (Qcol)

Colluvial soils were encountered in Trenches T-1 through T-7. These deposits are present across the northern portion of the proposed development and vary in thickness from approximately two to 9 feet. The colluvium generally consisted of loose to dense, damp to wet, silty fine- to coarse-grained sand. The upper portions of the colluvial deposits are poorly consolidated and potentially compressible and will require removal and compaction during grading. Based on laboratory testing, the lower portion of these deposits are generally suitable in their present condition for support of structural fill and settlement-sensitive structures (GEOCON 2021).

Granitic Rock (Kgr)

Cretaceous-age granitic rock underlies the surficial deposits throughout the property. 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. Granitic units generally exhibit adequate bearing and slope stability

characteristics and cut slopes should be stable to the proposed heights if free of adversely oriented joints or fractures (GEOCON 2021).

Deeper excavations than what was encountered in the trenches may generate boulders and oversize material (rocks greater than 12 inches in dimension) that will require special handling and placement. The rippability characteristics of the granitic rock has been evaluated by Atlas Technical Consultants (Atlas 2021). Atlas conducted a seismic P-wave (compression wave) refraction study at the project to develop subsurface velocity profiles of the areas studied, and to assess the depth to bedrock and apparent rippability of the subsurface materials. Based on the refraction results, variability in the excavatability (including depth of rippability) of the subsurface materials should be expected across the project area.

Soil Stability/ Expansive Soils

According to CBC Section 1803.5.3, expansive soils are defined as those soils with an expansion index (EI) greater than 20. The predominant material encountered was silty sand, with some clayey sands, which exhibit a low expansion potential per the 2019 CBC Section 1803.5.3.

Surficial deposits (undocumented fill, alluvium/colluvium) may be very moist to saturated during the winter or early spring depending on preceding precipitation. Overly wet soils will require drying or mixing with drier material prior to their use as compacted fill.

Compression

The Qal/Qcol deposits encountered at the site generally consisted of loose to medium dense, damp to saturated, silty fine to coarse sands. GEOCON performed laboratory testing on the lower portion of the Qal/Qcol to evaluate its compression potential. Based on the laboratory test results, the lower portion of the Qal/Qcol is suitable for support of compacted fill and structural loading (GEOCON 2021).

Groundwater

Groundwater was observed near the southern portion of the site where a natural drainage crosses the property and discharges into a culvert beneath North Iris Lane. It is not uncommon for groundwater or seepage conditions to develop where none previously existed. Groundwater elevations are dependent on seasonal precipitation, irrigation; land use, among other factors, and vary as a result (GEOCON 2021).

3.6.1.4 Geologic Hazards

Per the Geotechnical Investigation (Appendix G-1), no natural geologic hazards or geologic conditions exist on the proposed site that would preclude a residential development provided recommendations provided in the report are followed (GEOCON 2021).

Ground Rupture

According to the geotechnical investigation, the USGS maps (2016) indicates 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 18 miles west of the project site. The risk associated with ground rupture hazard is low (GEOCON 2021).

Seismicity

The San Diego County and Southern California region is seismically active. Considerations important in seismic design include the frequency and duration of motion and the soil conditions underlying the site. Seismic design of structures should be performed in accordance with the California Building Code (CBC) guidelines currently adopted by the local agency. The risk associated with strong ground shaking due to earthquake at the site is no greater than that for the region (GEOCON 2021).

Liquefaction and Seismically Induced Settlement

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.

The risk associated with liquefaction and seismically induced settlement hazard is low due to the dense nature of the materials that will be left in-place (GEOCON 2021).

Landslides

The risk associated with landslide hazards at the site is low (GEOCON 2021).

3.6.1.5 Paleontological Resources

Paleontological resources include fossil remains, as well as fossil localities (sites) and rock or soil formations that have produced fossil materials. Fossils are the remains or traces of prehistoric animals and plants and are important scientific and educational resources. The life forms preserved in rock and soil formations can provide insight to the environment that existed during various geologic time periods. The defining character of paleontological resources is their geologic age. Fossils or fossil deposits are generally regarded as being older than 10,000 years, marking the end of the late Pleistocene and the beginning of the Holocene.

There is a direct relationship between fossils and the geologic formations within which they are enclosed; therefore, with sufficient knowledge of the geology and stratigraphy of a particular area and the paleontological resource potential, it is possible to reasonably predict where fossils might or might not be found. According to the Geotechnical Investigation Report prepared for the project (GEOCON 2021), the geologic conditions underlying the site consist of undocumented artificial soils (Qudf), and Quaternary-aged colluvial and alluvium deposits (Qcol and Qal)). Cretaceous-age granitic rock underlies the surficial deposits throughout the property. The Quaternary Period is divided into two epochs: the Pleistocene (2.588 million years ago to 11.7 thousand years ago) and the Holocene (11.7 thousand years ago to today). The City of Escondido General Plan EIR identifies the geological formation for the project site as Old Alluvial Valley Deposits, late to middle Pleistocene in Figure 4.5-2 Geologic Formations. This formation is identified as having a moderate resource potential and sensitivity rating. Per the General Plan EIR (page 4.5-18), “Moderate resource potential and moderate sensitivity are assigned to geologic formations known to contain paleontological localities. These geologic formations are judged to have a strong, but often unproven, potential for producing unique fossil remains.”

3.6.2 Regulatory Framework

Federal

International Building Code

The International Building Code (IBC) is a model building code developed by the International Code Council that provides the basis for the California Building Code (CBC). The purpose of the IBC is to provide minimum standards for building construction to ensure public safety, health, and welfare. Prior to the creation of the IBC, several different building codes were used; however, by the year 2000, the IBC had replaced these previous codes. The IBC is updated every 3 years.

U.S. Geological Survey Landslide Hazard Identification Program

The United States Geological Service (USGS) was created by an act of Congress in 1879. The USGS is the sole science agency for the Department of the Interior. The USGS created the Landslide Hazard Program in the mid-1970s in fulfillment of the requirements of Public Law 106-113. According to USGS, the primary objective of the National Landslide Hazards Program is to reduce long-term losses from landslide hazards by improving the understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research. The reduction of losses due to geologic hazards is primarily a state and local responsibility.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act is the State law that focuses on hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating structures designated for human occupancy near active faults. As required by the act, the California Geological Survey has delineated Earthquake Fault Zones along known active faults in California

California Geologic Survey

The California Geologic Survey provides guidance with regard to seismic hazards. The California Geologic Survey's Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California (2008), provides guidance for evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was enacted in 1997 to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to map areas subject to seismic hazards. A geotechnical investigation of the site must be conducted and appropriate mitigation measures incorporated into the project design before development permits will be granted. Additionally, the Act requires a Standardized Natural Hazards Disclosure Statement form be completed by real estate sellers if a property is within one of the designated natural hazards areas.

Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act (effective June 1, 1998), requires "that sellers of real property and their agents provide prospective buyers with a 'Natural Hazard Disclosure Statement' when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone." SHMA specifies two ways in which this disclosure can be made:

- The Local Option Real Estate Transfer Disclosure Statement as provided in Section 1102.6a of the Civil Code; or
- The Natural Hazard Disclosure Statement as provided in Section 1103.2 of the Civil Code.

The Local Option Real Estate Disclosure Statement can be substituted for the Natural Hazards Disclosure Statement if it contains substantially the same information and substantially the same warning as the Natural Hazards Disclosure Statement. Both the Alquist-Priolo Act and the SHMA require that real estate agents, or sellers of real estate acting without an agent, disclose to prospective buyers that the property is located in an Alquist-Priolo Earthquake Fault Zone or Seismic Hazard Mapping Zone.

California Building Standards Code

The State's minimum standards for structural design and construction are given in the California Building Standards Code (CBC) (24 California Code of Regulations), located in Title 24 of the California Code of Regulations (CCR). The CBC is based on the International Building Code, which is used widely throughout the United States (generally adopted on a state-by-state or district-by-district basis) and has been modified for California conditions with numerous and more detailed or more stringent regulations. The CBC requires that "classification of the soil at each building site will be determined when required by the building official" and that "the classification will be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBC states that "the soil classification and design-bearing capacity will be shown on the [building] plans, unless the foundation conforms to specified requirements." The CBC provides standards for various aspects of construction, including (i.e., not limited to) excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soil strength loss. In accordance with California law, certain aspects of the proposed project would be required to comply with all provisions of the CBC. The 2019 Triennial Edition of the California Building Standards Code went into effect January 1, 2020.

3.6.2.1 Regional/Local Regulations

City of Escondido Grading and Erosion Control Ordinance

Article 55 of the City of Escondido Municipal Code establishes the grading and erosion control regulations for the city. The purpose of this article is to ensure that development occurs in a manner that protects the natural and topographic character and identity of the environment; visual integrity of hillsides and ridgelines; sensitive species and unique geologic/geographic features; and the health, safety, and welfare of the general public. This article regulates grading on private and public property and provides standards and design criteria to control storm water and erosion during construction activities. The ordinance sets forth rules and regulations to control excavation, grading, earthwork construction (including fills and embankments), and development on hillsides and along ridgelines; establishes the administrative procedures for the issuance of permits; and provides for approval of

plans and inspection of grading construction in compliance with storm water management requirements.

Chapter 22 of the City of Escondido Municipal Code

Chapter 22 of the City of Escondido's Municipal Code establishes regulations related to storm water management and discharge control, harmful waters and wastes, sewer service charges, private sewage disposal systems, sewer connection fees, sewer-connection laterals, and industrial wastewaters. Article 5 of Chapter 22 of the Code requires all subsurface sewage disposal units and systems to be designed, placed and maintained in accordance with the rules and regulations of the County of San Diego. The County Department of Environmental Health (DEH) is the primary agency charged with regulating the design, construction, and maintenance of septic tanks, leach lines, seepage pits, and alternative onsite wastewater treatment systems throughout the County through a delegation from the Regional Water Quality Control Board (RWQCB).

3.6.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts on existing geology and soils. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1:** 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;
- **Threshold #2:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking;
- **Threshold #3:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction;
- **Threshold #4:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides;
- **Threshold #5:** Result in substantial soil erosion or the loss of topsoil;
- **Threshold #6:** 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;
- **Threshold #7:** 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;
- **Threshold #8:** Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- **Threshold #9:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.6.4 Project Impact Analysis

3.6.4.1 Earthquake Fault Rupture

Threshold #1: 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.

The project site is located within a seismically active region, as is all of southern California; however, the project site is not located on or adjacent to any known active faults. According to the California Earthquake Hazard Zone Application, the City of Escondido is not identified as a jurisdiction affected by Alquist-Priolo Earthquake Fault Zones (California Department of Conservation 2019).

Project structures will be designed in accordance with the California Building Code (2019 or most current version at time of building) for resistance to seismic shaking. The project would be constructed in accordance with other CBC criteria, current seismic design specifications of the Structural Engineers Association of California, other applicable regulations, and all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA). The project would also be required to comply with all requirements of Article 55 of the City Municipal Code that establishes grading and erosion control regulations for the City.

Additionally, the project would implement all recommendations from the geotechnical investigation report (GEOCON 2021). These recommendations include general provisions related to the site as well as specific recommendations related to soil and excavation characteristics, corrosion, grading, slope stability, seismic design criteria, foundation and concrete slab-on-grade, retaining walls and lateral loads, slope maintenance, site drainage and maintenance, and grading and foundation plan review. The detailed recommendations are included in Chapter 6 of the geotechnical report, which is included as Appendix G1 of this document.

With adherence to all regulations and recommendations, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be less than significant.

3.6.4.2 Strong Seismic Groundshaking

Threshold #2: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The proposed project is located in tectonically-active southern California. The type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults, the intensity and the magnitude of the seismic event. Per the geotechnical engineering report (GEOCON 2021), 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 18 miles west of the project site. The risk associated with ground rupture hazard is low.

As described in Threshold #1, the project would be designed in accordance with the latest CBC, current design specification of the Structural Engineers Association of California, other applicable regulations, all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA), City of Escondido Municipal Code, and recommendations from the geotechnical

investigation (GEOCON 2021). With adherence to all regulations and recommendations, impacts related seismic ground shaking would be less than significant.

3.6.4.3 Seismic- Related Ground Failure, Including Liquefaction

Threshold #3: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

The Geotechnical Investigation indicated that there are no active faults mapped on the project site and the site is not located within a mapped Alquist-Priolo Earthquake Fault Zone.

Liquefaction

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.

A site specific geotechnical report determined that the risk associated with liquefaction and seismically induced settlement hazard is low due to the dense nature of the materials that will be left in place. Accordingly, the potential for liquefaction induced lateral spreading and seismic induced settlement is also considered to be low (GEOCON 2021). Furthermore, the project will implement all remedial grading and drainage recommendations contained within Chapter 6 of the geotechnical investigation report (Appendix G1 of EIR). Therefore, the project would not result in seismic-related ground failure, including liquefaction. Impacts would be less than significant.

3.6.4.4 Landslides

Threshold #4: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

The project site is relatively flat with elevations ranging from 705 feet AMSL in the southeast portion of the site to 735 feet AMS in the northwest corner. Topographically, the property gently slopes to the south. A natural drainage with shallow perched groundwater crosses the southern portion of the property and discharges into a culvert beneath North Iris Lane.

The project site is not identified as a landslide hazard area per Figure VI-9 of the Community Protection Element of the General Plan (City of Escondido 2012). Additionally, the geotechnical report states that risks associated with landslide hazards at the site is low (GEOCON 2021). Therefore, the project would not directly or indirectly cause potentially substantial adverse effects, including the risk of loss, injury or death involving landslides. Impacts would be less than significant.

3.6.4.5 Soil Erosion or Loss of Topsoil

Threshold #5: Result in substantial soil erosion or the loss of topsoil.

After removal of the existing structures, the entire project site would be graded to prepare the site for infrastructure and building pads.

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. Furthermore, the project will implement all slope maintenance, and site drainage and maintenance recommendations contained within Chapter 6 of the geotechnical report (Appendix G1 of EIR).

Therefore, the proposed project would incorporate BMPs and recommendations that would minimize erosion and loss of topsoil. The proposed project would not result in substantial soil erosion of the loss of topsoil. Impacts would be less than significant.

3.6.4.6 Unstable Soil

Threshold #6: 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.

According to the geotechnical investigation prepared by GEOCON (2021), the surficial soil types consist of undocumented fill, alluvium and colluvium overlain atop of Cretaceous-age granitic rock. In general, these soil types are unsuitable for support of settlement - sensitive structures and improvements and will require removal and compaction. Specifically, although not encountered during the field investigation, undocumented fill is expected beneath the existing residences. This deposit is estimated to be approximately five-foot-thick or less. Any undocumented fill encountered is considered unsuitable in its present condition and will require removal and compaction for support of structural fill and settlement-sensitive structures.

The upper portion of the alluvial/colluvial deposits are poorly consolidated and compressible and will require removal and compaction during grading. Based on laboratory testing, the lower portion of these deposits are generally suitable in their present condition for support of structural fill and settlement-sensitive structures. Excavations into the granitic rock will require special handling and placement.

The rippability characteristics of the granitic rock has been evaluated by Atlas Technical Consultants (Atlas 2021). Atlas conducted a seismic P-wave (compression wave) refraction study at the project to develop subsurface velocity profiles of the areas studied, and to assess the depth to bedrock and apparent rippability of the subsurface materials. Based on the refraction results, variability in the excavatability (including depth of rippability) of the subsurface materials should be expected across the project area. Blasting may be required depending on the excavation, depth, location, equipment used, and desired rate of production. In addition, oversized materials should be expected. A contractor with excavation experience in similarly difficult conditions should be consulted for expert advice on excavation methodology, equipment, and production rate (Atlas 2021).

Site preparation and fill material replacement would be completed consistent with Chapter 6 of the geotechnical investigation (GEOCON 2021). Specifically, grading would be accomplished under the observation and testing of the project geotechnical engineer and engineering geologist or their authorized representative in accordance with the recommendations and earthwork specifications of the geotechnical investigation and the current grading ordinance of the City of Escondido.

In summary, the proposed project would incorporate techniques and recommendations that would minimize the potential for unstable conditions that could result in on- or off-site, lateral spread, subsidence, liquefaction or collapse. Impacts would be less than significant.

3.6.4.7 Expansive Soil

Threshold #7: 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.

According to the geotechnical investigation prepared by GEOCON (2021), the soils encountered are considered to exhibit a low expansion potential as defined by 2019 CBC Section 1803.5.3. The predominant material encountered was silty sand, with some clayey sands, and exhibit a low expansion potential. Surficial deposits (undocumented fill, alluvium/colluvium) may be very moist to saturated during the winter or early spring depending on preceding precipitation. Groundwater and saturated soil were encountered in the southern portion of the property where a natural drainage crosses the site and outlets into a culvert beneath North Iris Lane. Dewatering may be necessary during remedial grading. Wet soil may require aeration or mixing with drier soil in order to be used as compacted fill. As such, these materials are susceptible to volume changes with variations in their moisture content, expanding with the introduction of water and shrinking as the soil dries. However, the expansion potential of these materials is not considered to pose a hazard for the proposed project (GEOCON 2021).

GEOCON performed laboratory testing on the lower portion of the alluvium/colluvium deposits to evaluate its compression potential. Based on the laboratory test results, the lower portion of the alluvium/colluvium deposits is suitable for support of compacted fill and structural loading. The potentially compressible portions of the alluvium/colluvium deposits will be removed and compacted during grading (GEOCON 2021).

With adherence to the geotechnical report recommendations, which include removal and compaction during grading, impacts related to expansive soils would be **less than significant**.

3.6.4.8 Septic Tanks / Alternative Wastewater Disposal Systems

Threshold #8: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The project site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. Currently one existing residence on the project site, 2089 North Iris Lane, is served by the City for sewer service. The other three residents have onsite septic. The onsite septic will be abandoned and removed during project demolition and all the future development would be entirely served by the City for sewer service. The project will connect to the existing 10-inch sewer line in North Iris Lane once annexed into the City. No upsizing of sewer lines is necessary to serve the project. As the project will not require the use of septic tanks or alternative wastewater disposal systems, no impact is identified for this issue area.

3.6.4.9 Paleontological Resources

Threshold #9 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project site lies within the Peninsular Ranges Geomorphic Province of southern California. According to the Geotechnical Investigation report prepared for the project (GEOCON 2021), the geologic conditions underlying the site consist of undocumented artificial soils (Qudf), and Quaternary-aged colluvial and alluvium deposits (Qcol and Qal)). Cretaceous-age granitic rock underlies the surficial deposits throughout the property. Alluvial soils were encountered along the

southern portion of the property. These deposits vary in thickness from approximately three to 12-feet-thick. Colluvial deposits were encountered across the northern portion of the proposed development and vary in thickness from approximately two to 9 feet thick. The Quaternary Period is divided into two epochs: the Pleistocene (2.588 million years ago to 11.7 thousand years ago) and the Holocene (11.7 thousand years ago to today).

Because paleontological resources are typically located underground and, therefore, not apparent until revealed by excavation, the potential for significant impacts to paleontological resources to occur is based on the extent that a geologic formation would be disturbed and the potential for those geologic formations to contain fossils.

Per the City of Escondido General Plan EIR, the paleontological resource potential for the geologic formations in the project site is considered moderate. Per the General Plan EIR Page 4.5-18, "Moderate resource potential and moderate sensitivity are assigned to geologic formations known to contain paleontological localities. These geologic formations are judged to have a strong, but often unproven, potential for producing unique fossil remains. The following geologic formations are considered to have moderate sensitivity within the proposed project area: Landslide Deposits; Old Alluvial Valley Deposits; Old Alluvial Fan Deposits; Undifferentiated Surficial Deposits (Holocene and Late Pleistocene); Undifferentiated Surficial Deposits (Late to Middle Pleistocene); and Cretaceous and Pre-Cretaceous Metamorphic Formations" (City of Escondido 2012b)

Activities resulting from implementation of the proposed project, especially construction-related and earth-disturbing actions could damage or destroy fossils in the underlying rock units should they be present. Destruction or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. Ground-disturbing activities in moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Therefore, ground-disturbing land development within these areas as a result of the proposed project would have the potential for a significant impact (Impact GEO-1) and mitigation is required.

- **Impact GEO-1** Project grading may result in disturbance of previously unknown paleontological resources.

3.6.5 Cumulative Impact Analysis

Geology and Soils

Due to the localized nature of geology and soils, cumulative projects would address potential impacts to geology and soils on a project-by-project basis, as potential geologic hazards and soil composition varies by site. Cumulative projects have the potential to be located on geologic units or soils that are expansive, unstable, or that would become unstable as a result of a project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Each cumulative project would be required to assess individual and site-specific geologic conditions, which would inform construction and development of each site. All cumulative development would be subject to similar requirements to those imposed and implemented for the proposed project and would be required to adhere to applicable regulations, standards, and procedures. Compliance of cumulative projects with applicable regulations would ensure that a significant regional cumulative impact would not occur. The proposed project, in combination with other cumulative projects, would not contribute to a potentially significant cumulative impact. A less than significant cumulative impact is identified.

Paleontological Resources

Further, as discussed in Section 3.6.4, the project site has the potential to yield paleontological resources. Thus, impacts to paleontological resources from implementation of the project would be potentially significant. Some of the projects on the cumulative list are located in areas that support alluvial soils. Certain types of alluvial soils have the potential to contain paleontological resources. Similar to the project, the presence of these resources is typically unknown until earthwork activities commence for project construction. It is expected that geotechnical studies would be prepared for all cumulative projects to assess potential impacts. For the cumulative projects that are within sensitive areas for paleontological resources, the expectation is that mitigation measures would be included to require consultation with a paleontologist or a construction monitor to ensure that impacts to this resource to do not occur. As such, the proposed project would not result in significant cumulative impacts for geology and soils. Impacts would be less than significant.

3.6.6 Mitigation Measures

Due to the fact that the Pleistocene old alluvial floodplain deposits have an unproven/undetermined sensitivity there is a potential that the site could contain paleontological resources that could be disturbed during grading activities for the project. The following mitigation is required.

MM-GEO-1 Prior to project grading the project applicant shall retain a qualified paleontologist to review the proposed project area to determine the potential for paleontological resources to be encountered. If there is a potential for paleontological resources to occur, the paleontologist shall identify the area(s) where these resources are expected to be present, and a qualified paleontological monitor shall be retained to monitor the initial cut in any areas that have the potential to contain paleontological resources.

3.6.7 Conclusion

Earthquake Fault Rupture

The project site is located within a seismically active region, as is all of southern California; however, the project site is not located on or adjacent to any known active faults. According to the California Earthquake Hazard Zone Application, the City of Escondido is not identified as a jurisdiction affected by Alquist-Priolo Earthquake Fault Zones (California Department of Conservation 2019). Project structures will be designed in accordance with the California Building Code (2019 or most current version at time of building) for resistance to seismic shaking. The project would be constructed in accordance with other CBC criteria, current seismic design specifications of the Structural Engineers Association of California, other applicable regulations, and all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA). The project would also be required to comply with all requirements of Article 55 of the City Municipal Code that establishes grading and erosion control regulations for the City.

With adherence to all regulations and recommendations within the geotechnical investigation report (GEOCON 2021), the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be **less than significant**.

Strong Seismic Groundshaking

Per the geotechnical engineering report (GEOCON 2021), 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 18 miles west of the project site. The risk associated with ground rupture hazard is low. the project would be designed in accordance with the latest CBC, current design specification of the Structural Engineers Association of California, other applicable regulations, all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA), City of Escondido Municipal Code, and recommendations from the geotechnical investigation (GEOCON 2021). With adherence to all regulations and recommendations, impacts related seismic ground shaking would be **less than significant**.

Seismic-Related Ground Failure, Including Liquefaction

The Geotechnical Investigation indicated that there are no active faults mapped on the project site and the site is not located within a mapped Alquist-Priolo Earthquake Fault Zone. The risk associated with liquefaction and seismically induced settlement hazard is low due to the dense nature of the materials that will be left in place. Accordingly, the potential for liquefaction induced lateral spreading and seismic induced settlement is also considered to be low (GEOCON 2021). Furthermore, the project will implement all remedial grading and drainage recommendations contained within Chapter 6 of the geotechnical investigation report (Appendix G1 of EIR). Therefore, the project would not result in seismic-related ground failure, including liquefaction. Impacts would be **less than significant**.

Landslides

The project site is relatively flat with elevations ranging from 705 feet AMSL in the southeast portion of the site to 735 feet AMS in the northwest corner. The project site is not identified as a landslide hazard area per Figure VI-9 of the Community Protection Element of the General Plan (City of Escondido 2012). Additionally, the geotechnical report states that risks associated with landslide hazards at the site is low (GEOCON 2021). Therefore, the project would not directly or indirectly cause potentially substantial adverse effects, including the risk of loss, injury or death involving landslides. Impacts would be **less than significant**.

Soil Erosion or Loss of Topsoil

The project would be under SWRCB General Construction Permit, which prohibits sediment or pollutant release from the project site and requires preparation of a SWPPP and implementation of BMPs that would incorporate erosion and sediment control measures during and after grading operations to stabilize these areas. Furthermore, the project will implement all slope maintenance, and site drainage and maintenance recommendations contained within Chapter 6 of the geotechnical report (Appendix G1 of EIR). Therefore, the proposed project would incorporate BMPs and recommendations that would minimize erosion and loss of topsoil. The proposed project would not result in substantial soil erosion of the loss of topsoil. Impacts would be **less than significant.**

Unstable Soil

According to the geotechnical investigation prepared by GEOCON (2021), the surficial soil types consist of undocumented fill, alluvium and colluvium overlain atop of Cretaceous-age granitic rock. In general, these soil types are unsuitable for support of settlement - sensitive structures and improvements and will require removal and compaction. Any undocumented fill encountered is considered unsuitable in its present condition and will require removal and compaction for support of structural fill and

settlement-sensitive structures. The upper portion of the alluvial/colluvial deposits are poorly consolidated and compressible and will require removal and compaction during grading. Excavations into the granitic rock will require special handling and placement.

Site preparation and fill material replacement would be completed consistent with Chapter 6 of the geotechnical investigation (GEOCON 2021). Specifically, grading would be accomplished under the observation and testing of the project geotechnical engineer and engineering geologist or their authorized representative in accordance with the recommendations and earthwork specifications of the geotechnical investigation and the current grading ordinance of the City of Escondido. In summary, the proposed project would incorporate techniques and recommendations that would minimize the potential for unstable conditions that could result in on- or off-site, lateral spread, subsidence, liquefaction or collapse. Impacts would be **less than significant**.

Expansive Soil

According to the geotechnical investigation prepared by GEOCON (2021), the soils encountered are considered to exhibit a low expansion potential as defined by 2019 CBC Section 1803.5.3. Dewatering may be necessary and wet soil may require aeration or mixing with drier soil in order to be used as compacted fill. However, the expansion potential of these materials is not considered to pose a hazard for the proposed project (GEOCON 2021). The potentially compressible portions of the alluvium/colluvium deposits will be removed and compacted during grading. With adherence to the geotechnical report recommendations, which include removal and compaction during grading, impacts related to expansive soils would be **less than significant**.

Septic Tanks/ Alternative Wastewater Disposal Systems

With demolition, the existing septic tanks on the project site will be abandoned and removed. All future development would be served by the City for sewer service. As the project will not require the use of septic tanks or alternative wastewater disposal systems, **no impact** is identified for this issue area.

Paleontological Resources

Activities resulting from implementation of the proposed project, especially construction-related and earth-disturbing actions could damage or destroy fossils in the underlying rock units. Destruction or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. Ground-disturbing activities in moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Therefore, ground-disturbing land development within these areas as a result of the proposed project would have the potential to significantly impact paleontological resources. Implementation of mitigation measures MM-GEO-1 would reduce this potential impact to **below a level of significance**.

3.7 Greenhouse Gas Emissions

This section of the Environmental Impact Report (EIR) describes the existing setting, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. This section is based on the Greenhouse Gas Study prepared for the proposed project by LDN Consulting on July 21, 2022 (LDN 2022b). The GHG report is included as Appendix H of the EIR. Background information was taken from the Escondido General Plan Update (City of Escondido 2012b); Climate Action Plan (City of Escondido 2021), and Climate Action Plan Checklist (City of Escondido 2021b), unless otherwise referenced.

3.7.1 Existing Conditions

3.7.1.1 Greenhouse Gases

GHGs such as water vapor and carbon dioxide are abundant in the earth's atmosphere. These gases are called "Greenhouse Gases" because they absorb and emit thermal infrared radiation which acts like an insulator to the planet. Without these gases, the earth's ambient temperature would either be extremely hot during the day or blistering cold at night. However, because these gases can both absorb and emit heat, the earth's temperature does not sway too far in either direction.

Over the years as human activities require the use of burning fossil fuels stored carbon is released into the air in the form of CO_2 and to a much lesser extent Carbon Monoxide (CO). Additionally, over the years scientist have measured this rise in Carbon Dioxide and the general consensus is that human activities contribute to the heating of the planet. Additionally, other GHGs such as Methane and Nitrous Oxide would contribute to global warming.

GHGs of concern as analyzed in this study are CO_2, Methane (CH_4), and Nitrous Oxide (N_2O). To simplify GHG calculations, both CH_4 and N_2O can be converted to an equivalent amount of CO_2 or CO_2e. CO_2e is calculated by multiplying the calculated levels of CH_4 and N_2O by a Global Warming Potential (GWP). The latest California Emissions Estimator Model (CalEEMod 2020.4.0) developed by Breeze Software uses the Intergovernmental Panel on Climate Change (IPCC) 2007 report as source data for GWP factors for both CH_4 and N_2O, using the 100-year period of 25 and 298, respectively (IPCC 2007). Furthermore, it should be noted that biogenic GHGs from the degradation of organic materials produced by human activities such as solid waste breakdown and wastewater breakdown are also calculated within CalEEMod and presented in this analysis.

3.7.2 Regulatory Framework

The following section provides a general description of the applicable regulatory requirements pertaining to GHGs, including federal, state and local guidelines.

Federal

The United States Environmental Protection Agency (USEPA) is the federal agency responsible for implementing the federal Clean Air Act (CAA). The Supreme Court of the United States ruled on April 2, 2007 that CO_2 is an air pollutant as defined under the CAA, and that USEPA has the authority to regulate emissions of GHGs.

Proposed Endangerment and Cause or Contribute Findings for GHG under the CAA

On December 7, 2009, USEPA signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs—carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6)—in the atmosphere threaten the public health and welfare of current and future generations; and
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare. These findings do not themselves impose any requirements on industry or other entities; however, this action is a prerequisite to finalizing USEPA's proposed GHG emission standards for light-duty vehicles, which USEPA proposed in a joint proposal including the Department of Transportation's (DOT) proposed CAFE standards on September 15, 2009.

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act. The Energy Independence and Security Act of 2007, among other key measures, would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards

On September 27, 2019, EPA and NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (84 Fed. Reg. 51,310), which became effective November 26, 2019. The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. The Part One Rule also impacted some of the underlying assumptions in the California Air Resources Board (CARB) EMFAC2014 and EMFAC2017 models for criteria air pollutant emissions from gasoline light-duty vehicles so CARB released off-model adjustment factors for EMFAC's criteria air pollutants estimation on November 20, 2019, primarily for use in federal Clean Air Act conformity demonstration analyses. California and 22 other states, as well as the District of Columbia and two cities, filed suit against the EPA over the vehicle waiver revocation on November 15, 2019, and a petition for reconsideration of the rule was filed on November 26, 2019.

In April 2020, the federal agencies issued the SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (Final SAFE Rule) that relaxed federal greenhouse gas emissions and

fuel economy standards. CARB's 2019 off-model adjustment factors were only for criteria pollutants, and U.S. EPA considered them to be acceptable for use in transportation conformity determinations in California. The Final SAFE Rule then relaxed federal greenhouse gas emissions and Corporate Average Fuel Economy (CAFE) standards to increase in stringency at only about 1.5 percent (%) per year from model year (MY) 2020 levels over MYs 2021–2026. The previously established emission standards and related "augural" fuel economy standards would have achieved about 4% per year improvements through MY 2025. The Final SAFE Rule affects both upstream (production and delivery) and downstream (tailpipe exhaust) carbon dioxide (CO_2) emissions (CARB 2020).

CARB has evaluated the Final SAFE Rule and determined that the criteria adjustment factors to EMFAC that were issued on November 20, 2019, and subsequently approved by U.S. EPA continue to be valid and should be used for purposes of transportation conformity. Although the Final SAFE Rule will increase upstream criteria pollutant emissions, and this is a serious problem, these upstream emissions do not directly implicate transportation conformity, and EPA has stated that EMFAC2017 and 2014 remain approved. Accordingly, additional adjustment factors for criteria pollutants are not needed beyond those already released for purposes of transportation conformity (CARB 2020).

State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, mobile sources, renewable energy procurement, water, solid waste, and water.

State Greenhouse Gas Targets

Executive Order S-3-05. Executive Order (EO) S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050.

Assembly Bill 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Nunez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

California Air Resources Board's Climate Change Scoping Plan. Under AB 32, the California Air Resources Board (CARB) is responsible for and is recognized as having the expertise to carry out and develop the programs and regulations necessary to achieve the GHG emissions reduction mandate of AB 32. Therefore, in furtherance of AB 32, CARB adopted regulations requiring the reporting and verification of GHG emissions from specified sources, such as industrial facilities, fuel suppliers and electricity importers (see Health & Safety Code Section 35830; Cal. Code Regs., tit. 17, §§95100 et seq.). CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 million metric tons (MMT) CO_2e). CARB's adoption of this limit is in accordance with Health and Safety Code Section 38550.

Further, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (2008 Scoping Plan) in accordance with Health and Safety Code Section 38561. The 2008 Scoping Plan established an overall framework for the measures to be implemented to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The 2008 Scoping Plan evaluated opportunities for sector-specific reductions, integrated all CARB and Climate Action Team[3] early actions and additional GHG reduction features by both entities, identified additional measures to be pursued as regulations, and outlined the role of a cap-and-trade program. The key elements of the 2008 Scoping Plan include the following:

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
2. Achieving a statewide renewable energy mix of 33%.
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS) (17 CCR 95480 et seq.).
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the 2008 Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level; i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations (referred to as "Business-As-Usual" [BAU]). For purposes of calculating this percent reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the 2008 Scoping Plan's Functional Equivalent Document, CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009–2016) and the Renewables Portfolio Standard (12 percent to 20 percent), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.

[3] The Climate Action Team is comprised of state agency secretaries and heads of state agencies, boards and departments; these members work to coordinate statewide efforts to implement GHG emissions reduction programs and adaptation programs.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) defined the state's GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EO S-3-05 and EO B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level, using more recent global warming potentials identified by the IPCC, from 427 million metric tons (MMT) CO_2e to 431 MMT CO_2e (CARB 2014).

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. The governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the legislature affirmed the importance of addressing climate change through passage of SB 32.

In 2017, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) for public review and comment (CARB 2017). The 2017 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the state's climate change priorities to 2030 and beyond. The strategies' known commitments include implementing renewable energy and energy efficiency (including the mandates of SB 350), increasing stringency of the LCFS, implementing measures identified in the Mobile Source and Freight Strategies, implementing measures identified in the proposed Short-Lived Climate Pollutant Reduction Strategy, and increasing stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program.

When discussing project-level GHG emissions reduction actions and thresholds in the context of CEQA, the 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development" for project-level CEQA analysis, but also recognizes that such a standard may not be appropriate or feasible for every development project. The 2017 Scoping Plan further provides that "the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

Executive Order B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050, as set forth in EO S-3-05.

Senate Bill 32 and Assembly Bill 197. SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target; make changes to CARB's membership, and increase legislative oversight of CARB's climate change-based activities; and expand dissemination of GHG and

other air quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants (TACs) from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

Executive Order B-55-18. EO B-55-18 (September 2018) establishes a statewide policy for the state to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies. The 2016 Title 24 building energy efficiency standards, which became effective on January 1, 2017, further reduce energy used in the state. In general, single-family homes built to the 2016 standards are anticipated to use approximately 28% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards (CEC 2015). The current version of CalEEMod used in this analysis employs, as a default parameter, the 2016 Title 24 standards to estimate GHG emissions.

The 2019 Title 24 standards were approved and adopted by the California Building Standards Commission in December 2018. The 2019 standards became effective January 1, 2020. The standards require that all low-rise residential buildings shall have a photovoltaic system meeting the minimum qualification requirements such that annual electrical output is equal to or greater than the dwelling's annual electrical usage. Notably, net energy metering rules limit residential rooftop solar generation to produce no more electricity than the home is expected to consume on an annual basis. Single-family homes built with the 2019 standards will use about 7% less energy due to energy efficiency measures versus those built under the 2016 standards, while new nonresidential buildings will use about 30% less energy mainly to lighting upgrades (CEC 2018).

The 2022 Building Energy Efficiency Standards (Energy Code) will improve upon the 2019 Energy Code for new construction of, and additions and alterations to, residential and nonresidential buildings. Workshops will be held to present revisions and obtain public comment. Proposed standards will be adopted in 2021 with an effective date of January 1, 2023. The California Energy Commission (CEC) updates the standards every three years.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen, and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of

sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective on January 1, 2017. The mandatory standards require mandatory reduction in indoor and outdoor water use, diversion of demolition waste, mandatory inspections of energy systems, inclusion of electric vehicle charging stations for designated parking spaces and use of low-pollutant-emitting exterior and interior finish materials. The CALGreen 2019 standards will continue to improve upon the 2016 CALGreen standards and will go into effect on January 1, 2020. The 2019 standards include mandatory measures for planning and design, energy efficiency, water and conservation efficiency, material and resource conservation as well as environmental quality.

Zero Net Energy Design Goals. As recognized in the First Update to the Scoping Plan, the California Public Utilities Commission, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. As background, the California Public Utilities Commission first set forth its zero net energy goals in the 2008 Energy Efficiency Strategic Plan and the 2011 Big Bold Energy Efficiency Strategies. The key policy timelines include: (1) all new residential construction in California will be zero net energy by 2020, and (2) all new commercial construction in California will be zero net energy by 2030. As most recently defined by the CEC in its 2015 Integrated Energy Policy Report, a zero net energy code building is one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building using the CEC's Time Dependent Valuation metric. It should be noted that Title 24 (2019) which became effective in 2020 requires rooftop solar for all new residential units.

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include: refrigerators, refrigerator-freezers and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Mobile Sources

State Vehicle Standards. AB 1493 requires CARB to set GHG emission standards for passenger vehicles and EO S-1-07 sets a declining Low Carbon Fuel Standard to reduce the carbon intensity of California passenger vehicle fuels. The Advanced Clean Cars Program is an emissions control program to reduce smog-forming pollution, GHG emissions, promote clean cars, and provide fuels for clean cars. EO B-16-12 supports and facilitates development and distribution of Zero Emissions Vehicles. As explained under the "Federal Vehicle Standards" description above, EPA and NHTSA approved the SAFE Vehicles Rule Part One, which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. As the EPA rule is the subject of

pending legal challenges, and no GHG adjustment factors have been issued for EMFAC by CARB, this analysis continues to utilize the best available information at this time, as set forth in EMFAC.

Senate Bill 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to California Government Code Section 65080(b)(2)(K), a sustainable community's strategy does not (1) regulate the use of land; (2) supersede the land use authority of cities and counties; or (3) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In 2010, CARB adopted the SB 375 targets for the regional metropolitan planning organizations. The targets adopted for SANDAG in 2010 are a 7% reduction in per capita passenger vehicle GHG emissions by 2020 and a 13% reduction by 2035, measured relative to 2005 GHG emissions. In 2018, CARB adopted the second round of SB 375 reduction targets, and increased SANDAG's 2020 target to a 15% reduction in per capita passenger vehicle GHG emissions and the 2035 target to a 19% reduction, using the same 2005 baseline (CARB 2021a).

In October 2015, SANDAG adopted San Diego Forward: The Regional Plan, which contains the region's current SCS. In December 2015, CARB, by resolution, accepted SANDAG's GHG emissions quantification analysis and determination that, if implemented, the SCS would achieve CARB's 2020 and 2035 GHG emissions reduction targets for the region. More specifically, as set forth in CARB Executive Order G-15-075, CARB determined that SANDAG's SCS would achieve a 15 percent per capita reduction by 2020 and a 21 percent per capita reduction by 2035.

In 2018, CARB updated the SB 375 targets. For purposes of SANDAG, the updated targets include a 15 percent reduction in emissions per capita by 2020 and a 19 percent reduction by 2035. SANDAG is in the process of preparing its next SCS, which will consider whether and how the region could attain these reduction targets.

Advanced Clean Cars Program. In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015 through 2025 (CARB 2012). The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB also has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that, in 2025, cars will emit 75 percent less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, also has adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025 (CARB 2021b).

The Zero Emission Vehicle (ZEV) program acts as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (PHEVs) in the 2018 to 2025 model years (CARB 2021a). PHEVs contain both an internal combustion engine and an electric motor, which is powered by batteries. As defined by CARB, ZEVs includes PHEVs, Battery Electric Vehicles (BEV) and Fuel Cell Electric Vehicles (FCEV). The Clean Fuels Outlet regulation will ensure that fuels such as electricity and hydrogen are available to meet the fueling needs of the new advanced technology vehicles as they come to the market. In this document, "EV" is used to refer to all types of electric, and low- or zero-emission vehicles.

As of August 2021, FCEVs are not common in the San Diego region due to limited refueling capabilities. Based on information obtained from the California Fuel Cell Partnership, only one hydrogen fuel station (located in the City of Del Mar) exists in San Diego County. At this time, one station is planned for construction in the City of San Diego sometime in the future (LDN 2021b). Therefore, for purposes of this analysis, only BEVs and PHEVs are referenced when ZEVs are discussed. If FCEVs gain traction in San Diego, additional GHG reductions would be realized.

EO B-16-12 (March 2012) directs state entities under the Governor's direction and control to support and facilitate development and distribution of ZEVs. This EO also sets a long-term target of reaching 1.5 million zero-emission vehicles on California's roadways by 2025. On a statewide basis, EO B-16-12 also establishes a GHG emissions reduction target from the transportation sector equaling 80 percent less than 1990 levels by 2050. In furtherance of this EO, the Governor convened an Interagency Working Group on Zero-Emission Vehicles that has published multiple reports regarding the progress made on the penetration of ZEVs in the statewide vehicle fleet.

Senate Bill 350. In 2015, SB 350 – the Clean Energy and Pollution Reduction Act – was enacted into law. As one of its elements, SB 350 establishes a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for achievement of the state's 2030 and 2050 reduction targets (see California Public Utilities Code, Section 740.12).

Renewable Energy Procurement

SB 1078 (2002) established the Renewables Portfolio Standard (RPS) program, which requires an annual increase in renewable generation by the utilities equivalent to at least 1 percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20 percent of their power from renewable sources by 2010.

SB X1 2 (2011) expanded the RPS by establishing that 20 percent of the total electricity sold to retail customers in California per year by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years be secured from qualifying renewable energy sources. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location. In addition to the retail sellers previously covered by the RPS, SB X1 2 added local, publicly owned electric utilities to the RPS.

SB 350 (2015) further expanded the RPS by establishing that 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030 be secured from qualifying renewable energy sources. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency.

SB 100 (2018) has further accelerated and expanded the RPS, requiring achievement of a 50 percent RPS by December 31, 2026 and a 60 percent RPS by December 31, 2030. SB 100 also established a new statewide policy goal that calls for eligible renewable energy resources and zero-carbon resources to supply 100 percent of electricity retail sales within the State of California by December 31, 2045.

Water

EO B-29-15. In response to drought-related concerns, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Solid Waste

AB 939 and AB 341. AB 939 (1989), known as the Integrated Waste Management Act (Public Resources Code Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25 percent by 1995 and 50 percent by the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies that CalRecycle believes would assist the state in reaching the 75 percent goal by 2020.

Increasing the amount of commercial solid waste that is recycled, reused, or composted will reduce GHG emissions primarily by 1) reducing the energy requirements associated with the extraction, harvest, and processing of raw materials and 2) using recyclable materials that require less energy than raw materials to manufacture finished products. Increased diversion of organic materials (green and food waste) will also reduce GHG emissions (CO_2 and CH_4) resulting from decomposition in landfills by redirecting this material to processes that use the solid waste material to produce vehicle fuels, heat, electricity, or compost.

Local

City of Escondido General Plan

A project's adherence to the City's General Plan can be determined through demonstrating consistency with General Plan assumptions and policies. If a project would generate GHG emissions consistent

with the maximum allowable buildout as defined by the General Plan, the project would be consistent with the estimated GHG emissions for that site.

City of Escondido Climate Action Plan

The City of Escondido developed an update to the 2013 Climate Action Plan (CAP) (City of Escondido 2021). The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. The CAP's strategies and measures are designed to reduce GHG emissions for build-out under the General Plan. The CAP does so by (1) calculating a baseline GHG emissions level as of 2012; and (2) estimating future 2030 and 2035 emissions under a business-as-usual standard; and (3) implementing state mandated GHG reduction targets. Measures to reduce GHG emissions for projects with land use consistent with the City's General Plan are found in the CAP. The CAP aims to achieve the following local community wide GHG reduction targets:

- 4 percent below 2012 levels (907,000 MTCO2e) by 2020,
- 42 percent below 2012 levels (547,000 MTCO2e) by 2030, and
- 52 percent below 2012 levels (456,000 MTCO2e) by 2035.

The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), and Guidance for Demonstrating Consistency with the City of Escondido CAP for Discretionary Projects Subject to CEQA Memorandum in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [MTCO2e] per year) for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. The memorandum also describes application of a numerical GHG threshold (set at 2.0 MTCO2e per service population (SP) per year) for use as a supplemental method for demonstrating consistency with the CAP.

A project's "service population" refers to a project's residential population plus employment population which would be generated by a proposed project development. This efficiency metric is expressed as MT CO2e per service population per year (MT CO2e/year/service population). Therefore, sometimes a residential project expresses its GHG efficiency in terms of GHG efficiency per capita (PC) per year, instead of per service person (Project MT CO2e/year/PC).

The San Diego Association of Governments (SANDAG), San Diego's regional planning agency, projects and estimates population for all jurisdictions in the San Diego region (SANDAG 2013). The population in 2035 within the City of Escondido is based on SANDAG Series 13 projection year 2035 which is 172,892. Housing within the city is 55,633 units. Therefore, the 2035 population per home is 172,892 divided by the anticipated number of residential units which equates to approximately 3.1 people per residential unit in 2035. SANDAG recently adopted the 2021 Regional Plan in December 2021.

3.7.3 Thresholds of Significance

Appendix G of the State CEQA Guidelines identifies two evaluation criteria to determine the significance of GHG emissions. A significant impact would be identified if the project would:

- **Threshold #1:** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- **Threshold #2:** Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gases.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP (City of Escondido 2021).

The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), and Guidance for Demonstrating Consistency with the City of Escondido CAP for Discretionary Projects Subject to CEQA Memorandum in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [MTCO2e] per year) for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. The memorandum also describes application of a numerical GHG threshold (set at 2.0 MTCO2e per service population (SP) per year) for use as a supplemental method for demonstrating consistency with the CAP.

A project's "service population" refers to a project's residential population plus employment population which would be generated by a proposed project development. This efficiency metric is expressed as MT CO2e per service population per year (MT CO2e/year/service population). Therefore, sometimes a residential project expresses its GHG efficiency in terms of GHG efficiency per Capita (PC) per year, instead of per service person (Project MT CO2e/year/PC).

The San Diego Association of Governments (SANDAG), San Diego's regional planning agency, projects and estimates population for all jurisdictions in the San Diego region (SANDAG 2013). The population in 2035 within the City of Escondido is based on SANDAG Series 13 projection year 2035 which is 172,892. Housing within the city is 55,633 units. Therefore, the 2035 population per home is 172,892 divided by the anticipated number of residential units which equates to approximately 3.1 people per residential unit in 2035.

3.7.4 Project Impact Analysis

3.7.4.1 Generation of Greenhouse Gas Emissions

Threshold #1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction Emissions

Construction-related GHG emissions include emissions from demolition, heavy construction equipment, truck traffic, soils import activities, and worker trips. Emissions for construction of the proposed project were calculated based on emission factors from the latest CalEEMod 2020.4.0 model which was developed by BREEZE Software for South Coast Qir Quality Management District (SCAQMD). CalEEMod incorporates emission factors from the EMFAC 2017 model for on-road vehicle emissions and the OFFROAD 2011 model for off-road vehicle emissions. Additionally, it should be

noted that default vehicle miles traveled (VMT) were updated to reflect EMFAC 2017's average miles driven per trip within the County for 2035.

The project would start construction in 2023 and end in 2025. As part of the construction operations, the project would demolish existing structures onsite which would be approximately 10,000 s.f. After demolition of the existing structures, the entire project site would be graded to prepare the site for infrastructure and building pads. Grading activities are expected to take three to four months. Grading activities would include 17,700 cubic yards (c.y.) of cut and 39,800 c.y. of fill, with a net import of 22,100 c.y. The maximum cut depth would be 15 feet in the northwestern portion of the site and the maximum fill depth would be 10 feet in the west central portion of the site. Soils import is expected to take three weeks. Assuming a 15 c.y. haul truck, this equates to approximately 100 trucks per day.

Blasting may be required in certain areas during construction due to the presence of granitic bedrock. Although the precise amount of blasting required is unknown at this time, if all granitic areas needed blasting, up to 6,812 c.y. of material would be subject to blasting. Following blasting, rock crushing of blasted materials would be needed. No rock crushing would occur on the site. Blasted materials would be transported to the Rosemary's Mountain Quarry in Fallbrook, approximately 15 miles north of the project site. The export of blasted materials is expected to take one week. Assuming a 15 c.y. haul truck, this equates to approximately 91 trucks per day.

As a project design feature, and condition of approval, the project would utilize Tier 4 construction equipment with attached diesel particulate filters or the equivalent.

Table 3.7-1 presents the anticipated construction emissions for the proposed project. As shown in Table 3.7-1, anticipated construction-related GHG emissions for the proposed project are estimated at 598.24 MT of CO_2e over the construction life of the project. Per SCAQMD guidance, these emissions are amortized over 30 years and add them to operational emissions. This amortized figure estimates project construction would contribute 30.57 MT per year of CO_2e.

Table 3.7-1. Expected Annual Construction CO_2e Emissions Summary

Year	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	Total CO_2e (metric tons/year)
2023	0.00	377.32	377.32	0.07	0.02	385.28
2024	0.00	465.14	465.14	0.08	0.01	470.68
2025	0.00	60.39	60.39	0.01	0.00	61.06
Total Construction Emissions						917.01
Yearly Average Construction Emissions (Metric Tons/year over 30 years)						**30.57**

Source: LDN Consulting 2022b.

Note: Expected Construction emissions are based upon CalEEMod modeling assumptions for equipment and durations listed in Table 4.1 of the GHG Report (LDN 2022b).

Operational Emissions

Once construction is completed, the proposed project would generate GHG emissions from daily operations, including sources such as area, electricity, mobile, solid waste and water uses, which are calculated within CalEEMod. Area Sources include landscaping, consumer products, and architectural

coatings as part of regular maintenance. Energy sources would be from uses such as electricity and natural gas consumption. Solid waste generated in the form of trash is also considered as decomposition of organic material breaks down to form GHGs. Water and wastewater emissions from the project generate emissions from offsite water conveyance and wastewater treatment facilities. Finally, the project would also generate GHGs through the use of carbon fuel burning vehicles for transportation which were assumed to be 8 trips per residential unit or 816 trips (LOS Engineering 2022).

Electrical energy-intensity factors, as recommended by CalEEMod inputs were assumed in the modeling. Title 24 efficiencies as modeled within CalEEMod 2020.4 utilize Title 24 (2019) as defaults. It should be noted that electrical energy-intensity factors were updated in CalEEMod 2020.4.0 to reflect San Diego Gas and Electric's (SDG&E) latest emissions rates which SDG&E provided to CAPCOA for the model update. CalEEMod 2016.3.2 (the model prior to 2020.4.0) was based on default emissions from 2009 which included a 10.5% RPS factor as indicated by California Public Utilities Commission (CPUC) (CPUC, 2016). The default CalEEMod 2020.4.0 emissions are now 540 pounds per megawatt hour (lb/MWh) which when compared with the defaults in 2016.3.2 represents a 33% achievement for RPS in 2020 which is consistent with SBX1-2. In accordance with SB 100, SDG&E will achieve an RPS of 60% in 2030. For purposes of this analysis, 2030 emission generation rates were used.

The CalEEMod model for the project has been updated to implement the following project design features (PDFs).

- PDF- 1: The project will install low flow water fixtures in all units.
- PDF-2: All indoor and outdoor lights in the project will be designed to use LED technology.
- PDF-3: The project will provide separate waste containers to allow for simpler material separations or the project will pay for a waste collection service that recycles the materials in accordance with AB 341 to achieve a 75% waste diversion. All green waste will be diverted from landfills and recycled as mulch.
- PDF–4: The project will not install hearth options.
- PDF- 5: The project will utilize ENERGY STAR qualified appliances.
- PDF-6: The project will utilize Tier 4 construction equipment with attached diesel particulate filters or the equivalent.
- PDF-7: The project will plant a minimum of 102 trees to sequester Carbon Dioxide (CO_2). CalEEMod uses the IPCC's protocol for vegetation sequestration calculations. Based on this, the model estimates how much CO_2 newly planted trees will sequester and reports the sequestration as a one-time carbon-stock change. (Per the IPCC, trees sequester CO_2 while they are actively growing) CalEEMod estimates a one-time emission reduction from each tree over the trees growing lifecycle of 20 years. The output from CalEEMod was then adjusted to reflect the 30-year annual average assumed as the facility lifecycle. Based on the model outputs, the 102 trees would sequester 72.21 MT CO2e over the tree's lifecycle. Similar to construction, the average yearly amortization over a 30-year period would be 2.41 MT CO2e per year.
- PDF 8: The project will install two kilowatts (kW) of solar per unit, or roughly 204 kW of solar in total at the project site. For reduction calculations associated with the PV design feature, annual energy estimates were provided by the National Renewable Energy Laboratory (NREL).

The NREL energy estimates are included in Attachment C to the GHG report – Appendix H of this EIR. Based on these estimates, the project solar (204 kW) would be estimated to generate 384,400 kWh of annual electrical energy. PV is considered 100 percent renewable and once installed would offset GHG emissions generated from non-renewable energy sources. To calculate GHG emission reductions from the PV panels, a separate CalEEMod file excluding RPS reductions was prepared and is shown in Attachment E to the GHG report- Appendix H of this EIR. Based on this, the GHG emission reductions from solar are expected to be 126.06 MT CO2e annually.

- PDF-9: The project will install electric heat pump water heaters in all units. (See E-4.1 of the City's CAP). The City's CAP estimated that in the year 2035, 822 MT CO2e will be reduced from Heat Pump water heaters which is based on the installation of 1,204 Heat Pump water heaters or roughly 0.68 MT/Heat Pump. Based on the addition of 102 heat pump water heaters, a reduction of 69.63 MT CO2e would be expected in 2035.

As shown in **Table 3.-7-2**, based on the CalEEMod analysis, the proposed project buildout with annualized construction emissions would generate 693.76 MT CO2e annually. These emissions include PDFs 1-6 shown above. PDFs 7--9 reduce emissions a further 198.1 MT reducing project emissions to 495.66 MT CO2e after all PDFs have been implemented.

Table 3.7-2. Proposed Project Operational Emissions Summary (MT/Year)

Source	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e (MT/Yr)
Area	0.00	1.24	1.24	0.00	0.00	1.27
Energy	0.00	111.70	111.70	0.00	0.00	112.23
Mobile	0.00	497.30	497.30	0.04	0.02	504.78
Waste	7.14	0.00	7.14	0.42	0.00	17.70
Water	2.11	18.10	20.21	0.22	0.01	27.21
Operations Total (Includes reductions from PDFs 1-6)						663.19
Amortized Construction Emissions (See Table 3.7-2 above)						30.57
Construction and Operations Total						693.76
PDF 7: Plant a Minimum of 102 Trees						-2.41
PDF 8: 204 kWh of PV						-126.06
PDF 9: Install 102 Heat Pump Water Heaters						-69.63
Project Total GHG Emissions						**495.66**
Project Capita = (102 units*3.1 people per unit)						**316.2**
Project Emissions per Capita ($MTCO_2e$ /year/pc)						**1.57**

Source: LDN Consulting 2022b.
Note: The data is presented in decimal format and may have rounding errors.

The City of Escondido CAP Checklist screening level suggests that projects that emit fewer than 500 MT CO2e would have a less than significant impact on the environment. Also, an alternative method would be to identify the annual GHG emissions divided by the SP which should be less than 2.0 within the city. The proposed project would produce 495.66 MT CO2e per year which produces a 1.57 MT CO2e per service population. These emissions would be less than both thresholds. The project will also install multiple PDFs which are consistent with the CAP checklist. Based on this, the project would have a **less than significant GHG impact** and no GHG mitigation measures would be necessary.

3.7.4.2 Conflict with Applicable Greenhouse Gas Plans, Policies or Regulations

Threshold #2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gases.

The proposed project will emit GHGs directly through the burning of carbon-based fuels such as gasoline as well as indirectly through usage of electricity, water, and from wastewater treatment as well as the anaerobic bacterial breakdown of organic solid waste. The analysis above considered the GHG emissions of the proposed project in comparison to the City's GHG screening thresholds that are identified in the City's CAP. The CAP Checklist screening level suggests that projects that emit fewer than 500 MT CO2e would have a less than significant impact on the environment. Also, an alternative method would be to identify the annual GHG emissions divided by the SP which should be less than 2.0 within the city. The proposed project would produce 495.66 MT CO2e per year which produces a 1.57 MT CO2e per service population. These emissions would be less than both thresholds. Since the project was found to generate less than 2.0 $MTCO_2e$ per capita, a **less than significant** GHG impact would be expected and the project would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions.

Also, the proposed project seeks to be annexed into the City of Escondido from the County of San Diego. Under the County's General plan, the site has a zoning density of R24 or 24 dwelling unit/acre (du/ac). The project applicant is seeking an Urban 3 General Plan Land use designation that allows up to 18 du/ac, but this project's proposed density is 13.2 du/ac. Since SANDAG regional growth projections are based on zoning classifications of R24 within the County, a reduction from 24 to 18 du/ac would decrease projected growth within the region. Given this the proposed density of 13.2 du/ac would be less intense in terms of GHGs for the region. Therefore, the project would not conflict with the City's ability to meet GHG reduction goals.

3.7.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. GHG analysis, by its nature, is a cumulative impact analysis.

Due to the global nature of the assessment of GHG emissions and the effects of global climate change, GHG emissions analysis, by its nature, is a cumulative impact analysis. Therefore, the information and analysis provided above in Section 3.7.4 to determine project-level impacts applies here and the project's contribution to global climate change would not be cumulatively considerable. This approach is consistent with the supporting documentation published by the California Natural Resources Agency

when promulgating the SB 97-related CEQA amendments, which indicated that the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact. The proposed project's calculated GHG emissions (Section 3.7.4.1) from both construction and operations would be within the City's GHG emissions threshold of 500 MT CO2e per year and 2.0 MT CO2e per service population. Therefore, the proposed project would comply with the City's GHG reduction targets and would not conflict with the applicable plans for reducing GHG emissions. Impacts would be **less than significant.**

3.7.6 Mitigation Measures

Based upon the analysis presented in Sections 3.7.4 and 3.7.5, project and cumulative greenhouse gas impacts would be less than significant. Therefore, no mitigation measures are necessary.

3.7.7 Conclusion

Generation of Greenhouse Gas Emissions

The analysis above considered the GHG emissions of the proposed project during construction and operation. The proposed project would produce 495.66 MT CO2e per year which produces a 1.57 MT CO2e per service population, which is below the 2.0 $MTCO_2e$ per capita threshold. Since the project was found to generate less than 2.0 $MTCO_2e$ per capita, a **less than significant** GHG impact would be expected and no mitigation is required.

Conflict with Applicable Greenhouse Gas Plans, Policies or Regulations

The proposed project's calculated GHG emissions would be within the City's GHG emissions threshold of 500 MT CO2e per year and 2.0 MT CO2e per service population. Therefore, the project would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Also, since SANDAG regional growth projections are based on the site being zoned as R24 within the County, the project's proposed density of 13.2 du/ac would be less intense in terms of GHGs for the region. Therefore, the project would not conflict with the City's ability to meet GHG reduction goals. Impacts would be less **than significant** and no mitigation is required.

3.8 Hazards and Hazardous Materials

This section of the Environmental Impact Report (EIR) analyzes the potential for the proposed project to have impacts related to hazards and hazardous materials. General information in this section is taken from the Escondido General Plan Update (City of Escondido 2012a), and the General Plan Program EIR (City of Escondido 2012b) unless otherwise referenced. Project-specific information is from the Phase I Environmental Site Assessment Report prepared by GEOCON Inc (2021) and the Fire Protection Plan (Dudek 2022). These reports are included as Appendix I and Appendix N.

3.8.1 Existing Conditions

This section describes the existing conditions on the project site and vicinity related to hazards and hazardous materials.

3.8.1.1 Project Site

The Phase I Environmental Site Assessment (Phase 1 ESA) was undertaken to assess the likelihood of any recognized environmental conditions (RECs) that might be present on-site as a result of current or historical land uses or adjacent uses. The Phase 1 ESA included site reconnaissance of the project site, reconnaissance of adjoining properties, a review of the historical usage of the project site, and a review of relevant documentation provided by various public and private sources. Regulatory information was also reviewed from federal, state, and local agencies through various electronic databases listing possible hazardous waste-generating facilities on and within the vicinity of the project site.

The American Society for Testing and Materials (ASTM) Designation E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process defines a REC as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions" (ASTM 2013). De minimis conditions are those that generally do not present a threat to human health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies.

Historical Land Uses

Aerial photographs, topographic maps, and previous reports of the project site were reviewed for evidence of past land uses that had the potential to have impacted the project site through the use, storage or disposal of hazardous substances and/or petroleum products. Per the Phase I ESA, the project site had been vacant until approximately 1964 when five structures and connecting dirt roads were developed. No conditions on or uses of the project site or adjoining properties were observed on the historical aerial photographs, topographic maps or previous reports with the potential to have caused a REC at the site.

Database Review

An environmental regulatory database review of local, state, and federal regulatory databases was conducted for the project site and facilities within one mile of the project site. The databases track the presence of underground storage tanks, hazardous waste generation, and hazardous material

releases. The complete database search is included as part of Appendix I of this EIR. The project site was not listed on any of the regulatory databases reviewed. There are 20 off-site properties identified in the database search within 1/2-mile of the project site. Per the Phase I ESA, none of these facilities are likely to have caused a REC at the project site (GEOCON 2021).

Two EDR Historical Cleaner and one EDR Historical Auto Stations are listed as adjacent to the site, however, upon further research it is likely that these are errors given that the City Directory has no information pertaining to the addresses listed. No further information aside from the names of the businesses is provided in the EDR report. Based upon these findings and the other listings on non-release-related databases, these properties are unlikely to have caused a REC at the project site (GEOCON 2021).

Site Reconnaissance

As part of the Phase 1 ESA, site reconnaissance was conducted by walking the project site and observing adjacent properties from the site and adjacent public streets. The project site was observed to be relatively flat that gently slopes to the northwest. A well and water storage system was observed in the large field in front of 2039 North Iris Lane. A number of sheds and storage areas were observed with various debris and equipment scattered. A pile of crushed asphalt was observed to the northeast of the property at 2085 North Iris Lane. No hazardous wastes were observed at the project site. The four single-family residences located at the site were inspected and no RECs were observed.

While no stained or contaminated soil was observed on site, interviews with current property owners and occupants revealed that fill dirt had been brought onto the site from an off-site source. Upon further questioning it was revealed that a local contractor dumped two dump truck loads of material in front of the property at 2039 North Iris Lane. No documentation concerning the materials source was provided, and thus the undocumented material is considered a REC.

Lead and Asbestos

Lead and asbestos were commonly used in building construction prior to 1980, although construction materials after 1980 may still include asbestos. On-site structures in the proposed project area were constructed in the 1960s. Thus, lead-based paint (LBP) and asbestos-containing materials (ACM) have potential to be present in the buildings onsite. Such materials may pose a health and safety risk if they are disturbed and become airborne and inhalable.

Wildfire Hazards

The project site's existing fire environment includes urbanized landscapes with single family residential to the north and south, larger lot residential to the west, and multi-family and office space to the east. The vicinity includes schools, golf course, and retail. A linear open space, Reidy Creek, occurs to the east of the project site. Currently, the project site is developed with four single family residences and associated outbuildings. The nearest larger open space is the Daley Ranch approximately 1.5 miles to the northeast. The existing project represents one of the higher fire threats in the vicinity due to on-site areas that seasonally grow vegetation that dries out and becomes available to fire ignitions until it is mowed/maintained. This threat will be removed with implementation of the project as it develops the entire site to ignition resistant landscapes.

The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire

2022). However, the project site is designated by the City as a High Fire Hazard Severity Zone. CAL FIRE's Fire and Resource Assessment Program fire history data indicates wildfires have occurred within a 5 mile vicinity of the project site; however, there have been no recorded wildfires on-site. The 1997 Del Dios Fire is the only wildfire that has burned within 1-mile of the project site, and the most recent wildfire in the project vicinity was the 2014 Cocos Fire.

3.8.2 Regulatory Framework

3.8.2.1 Federal Regulations

Chemical Accident Prevention Provision

The provisions listed under Part 68 of the Code of Federal Regulations (CFR) set forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accident releases, and the state accidental release prevention programs approved under Section 112(r) of the Clean Air Act.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendment and Reauthorization Act of 1986

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion.

Federal Aviation Regulations, Notice of Proposed Construction or Alteration

The Federal Aviation Administration (FAA), which has primary responsibility for the safety of civil aviation, imposes height restrictions in order to prevent obstructions to navigable airspace to protect flights and surrounding structures. In certain cases, the FAA should be notified of proposed development pursuant to Section 77.11 of Federal Aviation Regulations. The notification of proposed development enables the FAA to provide a basis for:

- Evaluating the effect of the construction or alteration on operational procedures and proposed operational procedures;
- Determinations of the possible hazardous effect of the proposed construction or alteration of air navigation;
- Recommendations for identifying the construction or alteration in accordance with current FAA Advisory Circular AC 70/7460-1K dated August 1, 2000, Obstruction Marking and Lighting;

- Determining other appropriate measures to be applied for continued safety of air navigation; and
- Charting and other notification to airmen of the construction or alteration.
- Certain jurisdictions can request an FAA evaluation of proposed development when certain features appear to be potentially hazardous.

Federal Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions to coordinate disaster mitigation planning and implementation. States are encouraged to complete a "Standard" or an "Enhanced" Natural Mitigation Plan. "Enhanced" plans demonstrate increased coordination of mitigation activities at the state level, and, if completed and approved, increase the amount of funding through the Hazard Mitigation Grant Program. California's updated State Hazard Mitigation Plan was adopted in October 2010 and approved by the Federal Emergency Management Agency (FEMA) Region IX. The City of Escondido is one of the communities covered by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan, described below, which is a countywide plan that identifies risks posed by natural and human-made disasters.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency.

Hazardous Materials Transport

The U.S. Department of Transportation (USDOT) regulates transportation of hazardous materials between states. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are California Highway Patrol (CHP) and the California Department of Transportation (Caltrans). Together, these agencies determine container types used and license hazardous waste haulers for transportation of hazardous waste on public roads, including explosives that may be used for blasting.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required for fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 188 substances are listed as Hazardous Air Pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. The EPA is establishing regulatory schemes for specific source categories and requires implementation of maximum achievable control technologies for major sources of HAPs in each source category. State law has established the framework for California's Toxic Air Contaminant Identification and Control Program, which is generally more stringent than the federal program, and is aimed at HAPs that are a problem in California. The State has formally identified more than 200 substances as toxic air contaminants and is adopting appropriate control measures for each. Once adopted at the state level, each air pollution control district will be required to adopt a measure that is equally or more stringent.

Renovating, Repair and Painting Rule

In 2008, EPA issued the Renovation, Repair and Painting Rule. This rule requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, childcare facilities, and schools be certified by EPA and use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an 8-hour training course from an EPA-approved training provider. Contractors must use lead-safe work practices and follow these three simple procedures: (1) contain the work area; (2) minimize dust; and (3) clean up thoroughly.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives the United States Environmental Protection Agency (USEPA) the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

3.8.2.2 State Regulations

The state regulations that govern hazardous materials are equal to or more stringent than federal regulations. California has been granted primary oversight responsibility by the EPA to administer and enforce hazardous waste management programs. State regulations have detailed planning and management requirements to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human health and the environment. Several key state laws pertaining to hazardous wastes are discussed below. In addition, the Department of Toxic Substance Control (DTSC), the State Water Resources Control Board (SWRCB), and the Integrated Waste Management Act (IWMA) also regulate the generation of hazardous materials, also described below.

California Emergency Services Act

The California Emergency Services Act provides the basic authority for conducting emergency operations following a proclamation of emergency by the governor and/or appropriate local authorities. Local government and district emergency plans are considered to be extensions of the California Emergency Plan, established in accordance with the Emergency Services Act.

California Fire Code

The California Fire Code (CFC) is Chapter 9 of CCR Title 24. It is created by the California Building Standards Commission and is based on the IFC created by the International Code Council, described above. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the CBC use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every 3 years.

California Health and Safety Code, Hazardous Materials Release Response Plans and Inventory

Two programs found in the California Health and Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Program (CalARP), which is the state adaptation of CFR Part 68, described above. The Department of Environmental Health (DEH) is responsible for the implementation of the HMBP program and CalARP in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulation. Congress requires USEPA Region 9 to make Risk Management Plan information available to the public through the USEPA's Envirofacts Data Warehouse.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs) or "Chisels" are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

California Integrated Waste Management Act

This act requires the development and implementation of household hazardous waste disposal plans. The Department of Resources Recycling and Recovery (CalRecycle), formerly the California Integrated Waste Management Board, oversees compliance with this act and enforces operational plans for solid waste facilities.

California State Fire Plan

The 2010 California State Fire Plan was the first statewide fire plan developed in concert between the State Board of Forestry and Fire Protection and CalFire. The central goals of the State Fire Plan include (1) improved availability and use of information on hazard and risk assessment; (2) land use planning,

including general plans, new development, and existing developments; (3) shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as community wildfire protection plans; (4) establishing fire resistance in assets at risk, such as homes and neighborhoods; (5) shared vision among multiple fire protection jurisdictions and agencies; (6) levels of fire suppression and related services; and (7) post-fire recovery.

Emergency Services Act

Under the Emergency Services Act (California Government Code Section 8850 et seq.), the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Quick response to incidents involving hazardous materials or hazardous waste is a key element of this plan. The Governor's Office of Emergency Services administers the plan, coordinating the responses of other agencies, including EPA, CHP, RWQCBs, air quality management districts, and county disaster response offices.

Government Code Section 65962.5 (Cortese List)

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by the state and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires Cal/EPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other California state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Waste Control Act

The Hazardous Waste Control Act is implemented by regulations contained in California Code of Regulations (CCR) Title 26 that describe requirements for the proper management of hazardous wastes. The act created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, transporting, and disposing of such wastes. Under these regulations, the generator of hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

Health and Safety Code Section 25270, Aboveground Petroleum Storage Act

The Aboveground Petroleum Storage Act requires registration and spill prevention programs for ASTs that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs that are implemented by the RWQCBs and the State Water Resources Control Board. County Department of Environmental Health is the local administering agency for this program within the proposed project area.

Occupational Health and Safety Administration, Asbestos and Lead

The EPA, CalEPA, and the California Occupational Health and Safety Administration (OSHA) regulate hazardous materials, including asbestos- and lead-containing materials. EPA banned several asbestos-containing products in the 1970s (see 40 CFR Part 61, Subpart M; 16 CFR Part 1305; and 16 CFR 1304). Per OSHA (29 CFR 1926.1101 and 29 CFR 1910.1001), insulation, surfacing, asphalt,

and vinyl flooring material prior to 1980 should be assumed to be asbestos-containing materials and handled accordingly. EPA and OSHA require proper abatement and disposal of asbestos- and lead-containing materials to protect human health and safety. If the abatement activities involve over 100 square feet of asbestos-containing materials, then the asbestos abatement is required to be completed or overseen by a certified consultant (Title 8 CCR, Article 2.6, Section 341.15). On a local level, these regulations are implemented through the San Diego APCD and County Department of Environmental Health.

State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry Fire Protection)

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas (SRAs). Title 14 regulates that the future design and construction of structures, subdivisions, and developments in an SRA shall provide for basic emergency access and perimeter wildfire protection measures. The project site is not located in or near an SRA.

Senate Bill 1889, Accidental Release Prevention Law/California Accidental Release Prevention Program

Senate Bill 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the Accidental Release Prevention Law/California Accidental Release Prevention Program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The California Accidental Release Prevention Program addresses facilities that contain specified hazardous materials, known as regulated substances that, if involved in an accidental release, could result in adverse off-site consequences. The California Accidental Release Prevention Program defines "regulated substances" as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Title 14, Division 1.5 of the California Code of Regulations

CCR Title 14, Division 1.5 establishes the regulations for CalFire and is applicable in all State Responsibility Areas where CalFire is responsible for wildfire protection. Development within State Responsibility Areas must comply with these regulations. Among other things, Title 14 establishes minimum standards for emergency access, fuel modification, property line setbacks, signage, and water supply.

Title 22 of the CCR and Hazardous Waste Control Law, Chapter 6.5

Under California Code of Regulations (CCR) Title 22, the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity; (2) ignitability; (3) corrosiveness; and (4) reactivity (CCR Title 22, Chapter 11, Article 3). A "hazardous material" is defined in Health and Safety Code Section 25501 as:

Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency

has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous materials in various forms can cause death; serious injury; long-lasting health effects; and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including County Department of Environmental Health.

Unified Program

Cal/EPA delegates to qualifying local agencies oversight and permitting responsibility for certain state programs pertaining to hazardous waste and hazardous materials. This is achieved through the Unified Program, created by state legislation in 1993 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following emergency and management programs:

- Hazardous materials release response plans and inventories (business plans);
- California Accidental Release Prevention Program (CalARP);
- Underground Storage Tank Program;
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure plans;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (tiered permitting) Programs; and
- California Uniform Fire Code: Hazardous material management plans and hazardous material inventory statements.

The County of San Diego is the designated certified unified program agency for all local jurisdictions within the San Diego region, including Escondido.

3.8.2.3 Regional/Local Regulations

Airport Land Use Commission and Airport Land Use Compatibility Plans

Airport Land Use Commissions assist local agencies in ensuring compatible land uses in the vicinity of existing or proposed airport; coordinate planning at state, regional and local levels; prepare and adopt airport land use policies; review plans or regulations submitted by local agencies; and review and makes recommendation regarding the land use, building heights, and other issues related to air navigation safety and the promotion of air commerce. The San Diego County Regional Airport Authority is the ALUC for the San Diego region.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains amendments to the California Fire Code. The purpose of consolidation of the County and local fire districts adoptive ordinances is to promote consistency in the interpretation and enforcement of the California Fire Code for the protection of public health and safety. The Consolidated Fire Code includes permit requirements for installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the Consolidated Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

To comply with the Disaster Mitigation Act of 2000, the County of San Diego prepared the Multi-Jurisdictional Hazard Mitigation Plan. The plan serves as both a county-wide plan and a plan for local jurisdictions that identifies risks posed by natural and human-made disasters before a hazard event occurs. The plan includes overall goals and objectives shared by many jurisdictions, as well as specific goals, objectives, and mitigation action items for each of the participating jurisdictions to help minimize the effects of the specified hazards that could potentially affect their jurisdiction. Goals, objectives, and action items for the City of Escondido are included in this plan.

San Diego County, Site Assessment and Mitigation Program

County Department of Environmental Health maintains the Site Assessment and Mitigation (SAM) list of contaminated sites that have previously undergone or are currently undergoing environmental investigations and/or remedial actions. The San Diego County SAM Program has a primary purpose of protecting human health, water resources, and the environment within San Diego County by providing oversight of assessments and cleanups in accordance with the California Health and Safety Code and the CCRs. The SAM's Voluntary Assistance Program also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with hazardous substances.

San Diego County Operational Area Emergency Plan

In San Diego County, there is a comprehensive emergency plan known as the Operational Area Emergency Plan (OAEP). The OAEP describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies the components of a comprehensive emergency management system, and describes the overall responsibilities for protecting life and property and ensuring the overall well-being of the population. The OAEP is used by San Diego County and the 18 incorporated cities within the County to respond to major emergencies and disasters (City of Escondido 2012b).

City of Escondido Municipal Code, Chapter 7

Chapter 7, Sections 7-1 through 7-8, of the City's Municipal Code provides for the preparation and carrying out of plans for the protection of persons and property within the city in the event of an emergency. It also discusses coordination of the emergency functions of the city with all other public agencies, corporations, organizations, and affected private persons. Chapter 7 of the Municipal Code

requires the City of Escondido Disaster Council to be responsible for development of the City's Emergency Action Plan for City Employees, which provides for the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency, state of emergency, or state of war emergency; and the organization, powers and duties, services, and staff of the emergency organization.

City of Escondido General Plan Community Protection Element

The City General Plan includes the Community Protection Element. The City's Community Protection Element addresses issues such as flood and fire hazards, geologic and seismic activity, and hazardous materials. Sections regarding Emergency Preparedness, Police and Fire service are also included. The applicable goals and policies are identified below.

Disaster Preparedness and Emergency Response Goal 1: A prepared and responsive community in the event of disasters and emergencies.

Fire Protection Goal 2: Protection of life and property through adequate fire protection and emergency medical services.

Fire Protection Policy 2.8: Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow requirements in the review of all development applications to minimize fire hazards.

Fire Protection Policy 2.14: Require new development in high wildfire risk areas to incorporate site design, maintenance practices, and fire resistant landscaping to protect properties and reduce risks.

Hazardous Materials Goal 8: A safe and healthy community and environment that is protected from the use, storage, and transport of hazardous materials.

3.8.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts related to hazards and hazardous material. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **Threshold #2:** 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.
- **Threshold #3:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- **Threshold #4:** 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.
- **Threshold #5:** For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.

- **Threshold #6:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- **Threshold #7:** Expose people or structures 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.

3.8.4 Project Impact Analysis

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

3.8.4.1 Routine Transport Use or Disposal of Hazardous Materials

Threshold #1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction

Construction of the proposed residential development would involve the use of common but potentially hazardous materials, including solvents, vehicle fuels, oils, grease, paints, caulking, cleaning materials, and caustic construction compounds. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these common, potentially hazardous materials would occur in accordance with Cal OSHA guidelines and would be disposed of in accordance with DTSC and County regulations. Adherence to federal, state, and local regulations regarding the use and disposal of hazardous materials and wastes would reduce potential impacts on human health and safety from handling and transport of hazardous construction materials. Impacts would be **less than significant.**

Operation

Development of the proposed residential development would involve the use or storage of common hazardous materials, including cleaning solvents, pesticides and related chemicals associated with landscaping maintenance, and paints. Transport, use, and disposal of hazardous materials at the proposed residences would include minor amounts of materials, would be similar to existing surrounding residential development, and would be intermittent and not considered routine. The use, handling, and disposal of these products is addressed by household hazardous waste programs that are part of the Integrated Waste Management Plan (IWMP) of the County of San Diego. The Household Hazardous Waste Element of the IWMP specifies how hazardous wastes generated by households shall be collected, recycled, treated, and disposed of safely.

Because compliance with all standards is required through federal, state, county, and municipal regulations, no significant impacts to the public or the environment are expected due to the routine transport, use, or disposal of hazardous materials during project construction or operation. Therefore, proposed project impacts would be **less than significant**.

3.8.4.2 Accidental Release of Hazardous Materials

Threshold #2: 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.

Construction

During construction of the proposed project, there is a potential for accidental upset of fuels, lubricants, or various other liquids needed to operate heavy equipment on the project site. These materials include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets. Direct impacts to human health and biological resources from accidental spills of small amounts of hazardous materials from construction equipment during construction of the buildings could occur in case of accidental spill or upset; however, existing federal and state standards are in place for the handling, storage, and transport of these materials. These include, but are not limited to, the Federal Chemical Accident Prevention Provisions (Part 68 of the Code of Federal Regulations), California Highway Patrol and California Department of Transportation container and licensing requirements for transportation of hazardous waste on public roads, the International Fire Code, The Resource Conservation and Recovery Act of 1976 as amended by the Hazardous and Solid Waste Amendments of 1984, California's Hazardous Waste Control Law, the California Fire Code, California Health and Safety Code Hazardous Materials Release Response Plans and Inventory, the California Integrated Waste Management Act, regulations developed by California Occupations Safety and Health Administration, and the state Hazardous Waste Control Act.

The proposed project includes removal of four existing single family residences constructed in the 1960s. Because of the age of the structures, it is likely that some building materials contain asbestos-containing materials and lead-based paint. Such materials may pose a health and safety risk if they are disturbed, and become airborne and inhalable during demolition. Improper removal would have the potential to expose construction workers to a hazardous release of asbestos or lead. This would be considered a **significant impact (Impact HAZ-1).**

- **Impact HAZ-1** Improper removal of asbestos-containing materials and lead-based paint during demolition could expose construction workers to a hazardous release of asbestos or lead.

Operation

Future uses proposed within the project area are limited to multi- family residences and recreation/open space uses. These types of land uses are not typically characteristic of generating, releasing, or using large amounts of hazardous materials. Industrial uses are not proposed as part of the proposed project. The only hazardous materials anticipated for transport, use, or disposal associated with the completed project are routinely used household products such as cleaners, paint, solvents, motor oil/automotive products, batteries and garden maintenance products. As stated above, the use, handling, and disposal of these products are addressed by household hazardous waste programs that are part of the IWMP of the County of San Diego.

Because compliance with all standards is required through federal, state, county, and municipal regulations, no significant impacts to the public or the environment are expected due to the release of hazardous materials. Therefore, the proposed project is not anticipated to 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 during operations. Impacts would be **less than significant.**

3.8.4.3 Hazardous Emissions Near Schools

Threshold #3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The project site is located approximately 1,000 feet (0.20 mile) from Calvin Christian Elementary School. However, residential uses are not characterized as those that would emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Per the City's General Plan EIR, "although hazardous materials can be found in all land uses, those that are more likely to regularly use high quantities of hazardous materials include light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial (General Plan EIR 2012b, Page 4.8-30." Therefore, it is not anticipated that the residential uses proposed by the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. Impacts are **less than significant.**

3.8.4.4 Hazardous Materials Sites

Threshold #4: 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.

As part of the Phase 1 ESA prepared for the proposed project, a database search report was obtained from Environmental Data Resources, Inc., 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. The findings of the Phase I ESA concluded that the proposed project site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5.

There are 20 offsite properties identified in the database search within 1/2-mile of the project site. Per the Phase I ESA, none of these facilities are likely to have caused a Recognized Environmental Condition (REC) at the project site (GEOCON 2021). Two EDR Historical Cleaner and one EDR Historical Auto Stations are listed as adjacent to the site, however, upon further research it is likely that these are errors given that the City Directory has no information pertaining to the addresses listed. No further information aside from the names of the businesses is provided in the EDR report. Based upon these findings and the other listings on non-release-related databases, these properties are unlikely to have caused a REC at the Site (GEOCON 2021).

Aerial photographs, topographic maps, and previous reports of the project site were reviewed for evidence of past land uses that had the potential to have impacted the project site through the use, storage or disposal of hazardous substances and/or petroleum products. Per the Phase I ESA, the project site has been vacant until approximately 1964 when five structures and connecting dirt roads were developed. No conditions on or uses of the project site or adjoining properties were observed on the historical aerial photographs, topographic maps or previous reports with the potential to have caused a REC at the site.

Site reconnaissance of the site and neighboring properties did not reveal the presence of any RECs. While no stained or contaminated soil was observed on site, interviews with current property owners

and occupants revealed that fill dirt had been brought onto the site from an off-site source. Upon further questioning, it was revealed that a local contractor dumped two dump truck loads of material in front of the property at 2039 North Iris Lane. No documentation concerning the materials source was provided, and thus the undocumented material is considered a REC. This would be considered a **significant impact (Impact HAZ-2).**

- **Impact HAZ-2** Undocumented fill material located at 2039 North Iris Lane may contain contaminated materials.

3.8.4.5 Airport Land Use Plan

Threshold #5: For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.

Airport Land Use Commissions assist local agencies in ensuring compatible land uses in the vicinity of existing or proposed airport; coordinate planning at state, regional and local levels; prepare and adopt airport land use policies; review plans or regulations submitted by local agencies; and review and makes recommendation regarding the land use, building heights, and other issues related to air navigation safety and the promotion of air commerce. The San Diego County Regional Airport Authority is the ALUC for the San Diego region.

The closest public airport to the project site is the McClellan-Palomar Airport located in the City of Carlsbad, approximately 11 miles west of the project site. The Ramona airport is located approximately 13 miles to the southeast of the project site. The Land Use Compatibility Plans (ALUCP) for these airports contain policies to promote land use compatibility between the airports and the adjacent and proximate land uses, to the extent these areas are not already developed with existing uses, and protect the public health, safety, and welfare.

The project site is not located within the McClellan-Palomar Airport or Ramona Airport ALUCPs. As such, the project would not result in hazards for people residing or working in the project area. Emergency Response Plan. **No impact** is identified.

Threshold #6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state, and local levels for all types of manmade and natural disasters. It is the responsibility of government to undertake an ongoing comprehensive approach to emergency management to avoid or minimize the effects of hazardous events. Local governments have the primary responsibility for preparedness and response activities.

Potential hazards or events that may trigger an emergency response action include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms, and freezes. Emergency response actions could also be triggered from a hazardous material incident; water or air pollution; major transportation accident; water, gas, or energy shortage; epidemic; nuclear accident; or terrorism.

To address disasters and emergency situations at the local level, the Unified Disaster Council is the governing body of the Unified San Diego County Emergency Services Organization. The Council is

chaired by a member of the San Diego County Board of Supervisors and comprises representatives from the 18 incorporated cities in San Diego County, including Escondido. The Escondido Fire Department is the City's lead agency responding to natural disasters such as earthquakes, floods, and storms, and for other emergencies related to fire, explosion, hazardous materials, rescue, and medical problems. Additionally, Escondido is included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, which was developed to serve as both a county-wide plan and a plan for local jurisdictions to identify risks posed by natural and human-caused disasters before a hazardous event occurs.

In the event of an emergency, emergency evacuation routes near the proposed project site are Centre City Parkway, I-15 and West Country Club Lane (City of Escondido 2012a). The proposed project would not impact any roadway or staging areas that are identified in any emergency planning documents. Access to the project site would be via one 36-foot wide driveway on Robin Hill Lane which would provide a private gated circular bulb turnaround entry with access to ingress and egress. A 24-foot wide gated secondary exit-only driveway would be provided at the eastern boundary of the project site to connect with North Iris Lane. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles.

In summary, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**.

3.8.4.6 Wildland Fires

Threshold #7: Expose people or structures 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.

The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). The existing highly developed project vicinity and development of the project site would not exacerbate wildfire risk with respect to exposure of project occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or alter post-fire slope stability. The project would also not require the installation or maintenance of associated infrastructure that may exacerbate fire risk.

Due to its location within an Escondido High Fire Hazard Severity Zone, all new structures will meet applicable Fire and Building Codes pursuant to requirements for ignition resistance (California Building Code, Chapter 7A). While the Project would not be considered a shelter-in-place development, these structures would be intended to provide temporary refuge as a contingency to evacuation should evacuation be considered less safe. Hardening each building against a wildfire would require building features as follows:

- New Class-A fire-rated roof and associated assembly. With the proposed Class-A fire-rated roof, there will be attic or void spaces above living spaces requiring ventilation to the outside environment. The attic spaces will require either ember-resistant roof vents or a minimum 1/16-inch mesh and shall not exceed 1/8-inch mesh for side ventilation (recommend BrandGuard, O'Hagin, or similar vents).
- Multi-pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes (CBC 708A) when tested according to NFPA 257 (such as SaftiFirst, SuperLite

20-minute rated glass product), or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2

- Ember resistant vents with a minimum of meeting the 1/16 inch to 1/8 inch mesh size.
- Exterior walls meeting CFC 707A.3
- Accessory structures, appendages, decks meeting ignition resistant requirements of CBC 709A and 710A

An approved, automatic fire sprinkler system will be installed in all new structures for the Project in accordance with minimum NFPA 13 D or R3 standards, 2019 CFC and CBC, and RFPD Fire Code or the current, adopted Code editions at the time building permits are issued. Additionally, information about "Ready Set Go" program will be provided in Owner's manuals. This program is designed to help residents prepare in the event of an approaching wildfire.

As such, through compliance with existing regulations, impacts related to wildland fires would be **less than significant.** A discussion of fire protection services for the proposed project is discussed in Section 3.13, Public Services.

3.8.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to hazards, the cumulative analysis is based upon a list approach to determine the proposed project's contributing effect on potential cumulative impacts related to hazards. All of the cumulative projects identified in Table 2-2 are considered in this cumulative analysis. Hazards impacts are generally site-specific and thus handled on a site-by-site basis.

Hazardous Materials

Cumulative projects within the proposed project area would result in new development, which would include facilities that use, store, dispose of, or transport of hazardous materials and potentially would increase hazards to the public or the environment. Similarly, the implementation of various cumulative projects would increase the likelihood of hazards to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials, including but not limited to the RCRA, CERCLA, Hazardous Materials Transportation Act, IFC, OSHA, and CCRs Title 22 and Title 27. These regulations along with site-specific mitigation would reduce the risks associated with the transport, use, storage, or accidental release of hazardous materials from cumulative projects. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to the creation of a significant hazard to the public or the environment.

Emergency and Evacuation Plans

Cumulative projects have the potential to impair existing emergency and evacuation plans. However, cumulative projects would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, local fire codes, and regional/jurisdictional emergency response and evacuation plans. Due to existing regulations and site-specific analysis and mitigation, the project would not contribute to a cumulative impact associated with the implementation of emergency response and evacuation plans.

Wildland Fires

The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). However, the project site is designated by the City as a High Fire Hazard Severity Zone.

Due to the project site's location within an Escondido High Fire Hazard Severity Zone, all new structures will meet applicable Fire and Building Codes pursuant to requirements for ignition resistance (California Building Code, Chapter 7A). While the project would not be considered a shelter-in-place development, these structures would be intended to provide temporary refuge as a contingency to evacuation should evacuation be considered less safe.

The existing highly developed project vicinity and development of the project site would not exacerbate wildfire risk with respect to exposure of project occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or alter post-fire slope stability. The cumulative projects would also be required to comply with existing regulations that would further reduce wildfire risk. Currently that is the 2020 Consolidated Fire Code, 2019 California Building Code, San Diego County requirements for Enhanced Building Construction and California State Fire Marshal requirements for fire resistive construction. Therefore, the project's contribution to a cumulative impact related to wildland fire would not be significant.

3.8.6 Mitigation Measures

Implementation of the following mitigation measures would be required as a condition of project approval:

- **Impact HAZ-1 Accidental Release of Hazardous Materials (ACM and LBPs)**

MM-HAZ-1a Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that an asbestos survey has been conducted on any buildings that are to be demolished or removed from the project site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations to properly abate and dispose of all on-site asbestos-containing materials before general demolition activities commence.

MM-HAZ-1b Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, the applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.

- Impact HAZ-2 Hazardous Material Sites

MM-HAZ-2 Prior to construction activities on the project site, the Applicant shall submit verification that the undocumented fill material placed in front of 2039 North Iris Lane has been removed or evaluated for the potential for contaminants. If contaminated, the soil must be removed and disposed of according to local and state regulations. If contaminated soil is identified, the applicant shall follow all procedural and regulatory requirements for its proper removal and disposal before general construction activities commence.

3.8.7 Conclusion

Routine Transport, Use, or Disposal of Hazardous Materials

Implementation of the proposed project would result in an increase in the transport, use, and disposal of hazardous materials during construction and operation; however, it would include minor amounts of materials, would be similar to existing surrounding residential development, and would be intermittent and not considered routine. Because compliance with all standards is required through federal, state, county, and municipal regulations, no significant impacts to the public or the environment are expected due to the routine transport, use, or disposal of hazardous materials during project construction or operation. Therefore, proposed project impacts would be **less than significant**.

Accidental Release of Hazardous Materials

Implementation of the residential development could result in accidental leaks or spills of hazardous materials that may occur during construction of the proposed project, which have the potential to expose the public or the environment to hazardous materials. Improper removal of existing structures would have the potential to expose construction workers to a hazardous release of asbestos or lead. Implementation of mitigation measures MM-HAZ-1a and MM-HAZ-1b would reduce the potential for upset and accident conditions related to asbestos containing materials and lead based paint by requiring testing, and proper abatement prior to demolition. With implementation of mitigation measures MM-HAZ-1a and MM-HAZ-1b, impacts during project construction would be **mitigated to below a level of significance.**

Following construction of the residential development, use of household hazardous products may result in minor upsets or spills, but typical use of these products would not create a significant hazard. Therefore, impacts associated with reasonably foreseeable upset and accident conditions in occupied residences involving the release of hazardous materials into the environment would be **less than significant.**

Hazardous Emissions Near Schools

While the project is located within one-quarter mile of a school (Calvin Christian Elementary), residential uses are not characterized as those that would emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Therefore, it is not anticipated that the residential uses proposed by the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. Impacts would be **less than significant**

Hazardous Materials Sites

The findings of the Phase I ESA concluded that the proposed project site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. No conditions on or uses of the project site or adjoining properties were observed on the historical aerial photographs, topographic maps or previous reports with the potential to have caused a REC at the site. While no stained or contaminated soil was observed on site, interviews with current property owners and occupants revealed that fill dirt had been brought onto the site from an off-site source. Because the source of undocumented materials is unknown, it is possible that it contains contaminated materials. Implementation of mitigation measure MM-HAZ-2 would ensure that the undocumented fill material was either removed or evaluated for potential contaminants. If contaminated soil is identified, the applicant shall follow all procedural and regulatory requirements for its proper removal and disposal before general construction activities commence. Therefore, with implementation of mitigation measures MM-HAZ-2, impacts related to hazardous materials on the project site would be mitigated to a less-than significant levels

Airport Land Use Plan

The public airports closest to the project site is the McClellan-Palomar Airport, located approximately 11 miles to the west and Ramona Airport, located approximately 13 miles to the southeast. The project site is not located within the McClellan-Palomar Airport or Ramona Airport Land Use Compatibility Plans. As such, the project would not result in hazards for people residing or working in the project area. Emergency Response Plan. **No impact** is identified.

Emergency Response and Evacuation Plans

In the event of an emergency, emergency evacuation routes near the proposed project site are Centre City Parkway, I-15 and West Country Club Lane (City of Escondido 2012a). The proposed project would not impact any roadway or staging areas that are identified in any emergency planning documents. Therefore, the project would not impair implementation of or physically interfere with emergency response or evacuation plans. Impacts would be **less than significant**.

Wildland Fires

The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). The existing highly developed project vicinity and development of the project site would not exacerbate wildfire risk with respect to exposure of project occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or alter post-fire slope stability. The project would also not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. Through compliance with existing regulations, impacts related to wildland fires would be **less than significant.**

3.9 Hydrology and Water Quality

This section of the Environmental Impact Report (EIR) describes the existing hydrological and water quality conditions on the project site and analyzes the potential impacts of the proposed project on hydrology and water quality. General information in this section is taken from the Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report (General Plan Program EIR) (City of Escondido 2012b) unless otherwise referenced. Project-specific information is from the Preliminary Drainage Study (SB&O 2022) and Priority Development Project Stormwater Quality Management Plan (SWQMP) (SB&O 2021). These reports are included as Appendices J1 and J2.

3.9.1 Existing Conditions

3.9.1.1 Existing Drainage

Onsite Drainage

The project site is tributary to the Reidy Creek, located 700 feet east of North Iris Lane, which flows three miles south to Escondido Creek channel, and then westerly 15 miles to the San Elijo Lagoon, part of the Carlsbad Watershed (904).

According to the Preliminary Drainage Study, site drainage patterns are predominantly overland (5% to 8% range) from west to east, with the majority of the site runoff discharging to the southeastern corner of the site. Street slopes adjacent to the site range from 1.5% along North Iris to 5% (or more) on Robin Hill Lane. A shallow trapezoidal channel conveys runoff from the westerly off-site areas through the site, to the shallow box culvert under North Iris Lane. The northerly portion of the site drains northeasterly towards the intersection of Robin Hill and North Iris, which continues northerly, approximately 450 feet, in the gutter toward a curb inlet and public storm drain (MS-4) which conveys flows southerly and easterly to Reidy Creek.

Off-Site Drainage

The off-site drainage area upstream of the project site is substantial (approximately 113 acres) and includes runoff from the areas located northwest of the site. Tributary areas include properties along Centre City Parkway, and residential development and commercial properties on the north and south sides of County Club Lane.

Overland flow lengths are limited, with substantial lengths in concrete ditches, street gutters, storm drains, and unlined channels. The hydrologically most remote point is at the ridgeline just south of the Centre City Parkway / Interstate 15 offramps (“E” Hill). Runoff flows westerly down the hillside to the drainage ditch along the east side of Centre City Parkway (northbound), to the greenbelt north of Country Club Lane. Flows are intercepted by a 48” storm drain, routed southerly to discharge at a headwall at the south end of the athletic fields. A shallow semi-improved drainage channel conveys flows southerly and easterly between the residential lots, private driveways, and the unpaved portions of Robin Hill Lane to the westerly boundary of the project.

Water Quality

The proposed project is located within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). The project site is located within the Carlsbad Hydrologic Unit (HU), one of 11 major

drainage areas identified in the San Diego RWQCB Water Quality Control Plan for the San Diego Basin. The Carlsbad HU is a generally triangular-shaped area encompassing approximately 211 square miles and extends from the east side of Lake Wohlford to Solana Beach-Carlsbad along the coast. The Carlsbad HU is divided into a number of hydrologic areas and subareas based on local drainage characteristics. The project is located within the Escondido Creek Hydrologic Area (HA) and the Escondido Hydrologic Subarea (HSA). Drainage within the Carlsbad HU is predominantly through a number of moderate sized creeks and associated tributaries, including Escondido Creek. The Escondido Creek system consists of a number of water bodies that are listed as impaired under Section 303(d) of the Clean Water Act. The San Elijo Lagoon is impacted primarily by indicator bacteria, eutrophic conditions, and sedimentation/siltation. Escondido Creek is listed for DDT, Enterococcus, Fecal Coliform, Manganese, Phosphate, Selenium, Sulfates, Dissolved Solids, Nitrogen, and Toxicity (City of Escondido 2017).

3.9.2 Regulatory Framework

3.9.2.1 Federal Regulations

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The standard for flood protection is established by FEMA, with the minimum level of flood protection for new development determined to be the one percent-annual exceedance probability (i.e., the 100-year flood event). Per FEMA's Flood Insurance Rate Map Numbers 06078C0811G and 06073C0813G, the project site is located within Zone X, Area of Minimal Flood Hazard, and is not located within a 100-year flood hazard area (FEMA 2012).

Clean Water Act

The 1972 Clean Water Act (CWA) was designed to restore and maintain the chemical, physical, and biological integrity of the waters of the U.S. The CWA also directs states to establish water quality standards for all waters of the U.S. and to review and update such standards on a triennial basis. The U.S. Environmental Protection Agency (EPA) has delegated responsibility for implementation of portions of the CWA in California to the State Water Resources Control Board (SWRCB) and the regional water quality control boards (RWQCBs). This includes water quality control planning and control programs such as the National Pollutant Discharge Elimination System (NPDES), which seeks to control water pollution through the issuance of permits regulating the discharge of pollutants into waters of the U.S. Section 303 of the CWA requires states to adopt water quality standards for all intrastate waters of the U.S.

Sections 401 and 404 of the CWA

CWA Sections 401 and 404 are administered through the regulatory program of the U.S Army Corps of Engineers (USACE) and regulate the water quality of all discharges of fill or dredged material into waters of the United States, including wetlands and intermittent stream channels.

Section 401 sets forth water quality certification requirements for any applicant applying for a federal license or permit to conduct any activity including, but not limited to, the construction or operation of

facilities that may result in any discharge into the navigable waters. Section 404, in part, authorizes the USACE to:

- Set requirements and standards pertaining to such discharges: (subparagraph [e]).
- Issue permits "for the discharge of dredged or fill material into the navigable waters at specified disposal sites:" (subparagraph [a]).
- Specify the disposal sites for such permits: (subparagraph [b]).
- Deny or restrict the use of specified disposal sites if "the discharge of such materials into such area would have an unacceptable, adverse effect on municipal water supplies and fishery areas:" (subparagraph [c]).
- Specify type of and conditions for non-prohibited discharges: (subparagraph [f).
- Provide for individual state or interstate compact administration of general permit programs: (subparagraphs [g], [h], and [j]).
- Withdraw approval of such state or interstate permit programs: (subparagraph [i]).
- Ensure public availability of permits and permit applications: (subparagraph [o]).
- Exempt certain federal or state projects from regulation under this section: (subparagraph [r]); and
- Determine conditions and penalties for violation of permit conditions or limitations: (subparagraph [s]).

National Pollutant Discharge Elimination System

As authorized by CWA Section 402(p), the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. In California, the State Water Resources Control Board issues NPDES permits to cities and counties through the various RWQCBs. It is the responsibility of the RWQCBs to preserve and enhance the quality of the state's waters through the development of water quality control plans and the issuance of waste discharge requirements. Waste discharge requirements for discharges to surface waters also serve as NPDES permits.

3.9.2.2 State Regulations

National Pollution Discharge Elimination System Permits

In California, the SWRCB and its RWQCBs administer the NPDES permit program. The NPDES permit system was established in the Clean Water Act to regulate both point source discharges and non-point source discharges to surface waters of the U.S. The NPDES program consists of characterizing receiving water quality, identifying harmful constituents, targeting potential sources of pollutants, and implementing a comprehensive stormwater management program. Construction and industrial activities are typically regulated under statewide general permits that are issued by the SWRCB.

The RWQCB also issues Waste Discharge Requirements (WDRs) that serve as NPDES permits under the authority delegated to the RWQCBs under the CWA. In November 1990, under Phase I of the urban runoff management strategy, the EPA published NPDES permit application requirements for municipal, industrial, and construction stormwater discharges. With regard to municipalities, the permit

application requirements were directed at jurisdictions owning or operating municipal separate storm sewer systems serving populations of 100,000 or more, or contributing significant pollutants to waters of the U.S. Such municipalities were required to obtain coverage under a NPDES municipal stormwater permit as well as to develop and implement an urban runoff management program to reduce pollutants in urban runoff and stormwater discharges.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act was enacted in 1969. This act authorizes the State Water Resources Control Board (SWRCB) to adopt, review, and revises policies for all waters of the state (including both surface and ground waters) and directs the Regional Water Resources Control Board (RWQCBs) to develop region-specific Basin Plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The purpose of these plans is to designate beneficial uses of the region's surface and ground waters, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives California Water Code

In the California Water Code there are 22 kinds of districts or local agencies with specific statutory provisions to manage surface water. Many of these agencies have statutory authority to exercise some forms of groundwater management. For example, a Water Replenishment District (Water Code Section 60000 et seq.) is authorized to establish groundwater replenishment programs and collect fees for that service, while a Water Conservation District (Water Code Section 75500 et seq.) can levy groundwater extraction fees.

Construction Stormwater Permits

Stormwater runoff from construction activity that results in soil disturbances of at least one acre of total land area (and projects that meet other specific criteria) is governed by the State Water Resource Control Board (SWRCB) under Water Quality Order 99-082009-0009-DWQ, NPDES Permit #CAS000002. These regulations prohibit discharges of polluted stormwater from construction projects that disturb one or more acres of soil unless the discharge is in compliance with the general NPDES permit requirements. The nine individual RWQCBs enforce the General Construction Permits for projects within their region. The San Diego RWQCB oversees permits in the proposed project area. It is the responsibility of the landowner to obtain coverage under the General Construction Permit prior to commencement of construction activities. To obtain coverage, the owner must file a Notice of Intention with a vicinity map and the appropriate fee to the SWRCB. The General Permit outlines the requirements for preparation of a Storm Water Pollution Prevention Program (SWPPP).

3.9.2.3 Regional/Local Regulations

Carlsbad Watershed Management Area Water Quality Improvement Plan

The Carlsbad Watershed Management Area (WMA) Water Quality Improvement Plan (WQIP) is a requirement of stormwater regulations adopted by the RWQCB according to Order No. R9-2013-0001, as amended by Order Nos. R9 2015-0001 and R9-2015-0100. The goal of the WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies. These improvements in water quality will be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions (HPWQC) within the watershed and implements strategies to address them. Agencies involved in the development of the WQIP include the County of San Diego and the cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista.

The purpose of the Carlsbad WMA WQIP is to guide the Responsible Agencies' Jurisdictional Runoff Management Programs (JRMP)s toward achieving improved water quality in MS4 discharges and receiving waters. Through the WQIP, priorities and goals are established and strategies selected for implementation through the Responsible Agencies' JRMPs to progress toward improvements in water quality. This approach establishes the WQIP as the overarching plan that each Responsible Agency will use to develop and implement their jurisdictional programs. Responsible Parties' JRMPs contain the strategies, standards and protocols by which each Responsible Agency will implement their individual program in response to the priorities and goals established in the WQIP.

The Carlsbad WQIP was originally submitted to the RWQCB in June 2015 and after revisions based on RWQCB comments, an acceptance letter from the RWQCB was issued on November 22, 2016. A 2021 update has been initiated, primarily to incorporate an assessment of bacteria data for Agua Hedionda Lagoon and revisions noted in prior Annual Reports. The 2021 WQIP was submitted to the Regional Board in January 2021 and the Responsible Agencies are awaiting acceptance of the document (Carlsbad WMA 2021).

City of Escondido Jurisdictional Runoff Management Plan (JRMP)

The City of Escondido Jurisdictional Runoff Management Plan (JRMP) was developed to comply with the requirements of the RWQCB Order Number and the San Diego Region Municipal Separate Storm Sewer System (MS4) Permit (Order No R9-2013-001, as amended). The 2013 MS4 Permit applies to all 21 municipal agencies in San Diego County, including the City of Escondido. All jurisdictions are required to develop both jurisdictional and watershed-scale plans that detail how they will comply with the new requirements: JRMPS and WQIPs, respectively. WQIPs are collaborative efforts involving multiple jurisdictions, while the City's JRMP only applies to activities of the City of Escondido. The WQIPs are an adjunct to the JRMP, which is essentially the standard operating procedure for implementing the select WQIP strategies (City of Escondido 2017).

The JRMP presents a strategy to reduce the discharge of pollutants from the MS4 to the maximum extent practicable and to effectively prohibit non-storm water discharges from the City's MS4. These strategies involve improving upon existing programs and developing new programs to minimize or eliminate the effects of runoff from the City to receiving waters including Escondido and Reidy Creeks in the Carlsbad WMA and Kit Carson and Felicita Creeks in the San Dieguito River WMA. Programs described within the JRMP address illicit discharge detection and elimination, development planning, construction management, existing development management, and public education and participation, as well as the City's legal authority to enforce and enact these programs.

The most recent Escondido JRMP was adopted in January 2017. Since then, the City of Escondido has made changes to pollution prevention strategies which are included in the 2021 Amendment to the City's JRMP. The goal of the Escondido JRMP is to improve the quality of runoff so that local waterbodies (e.g., Escondido Creek, Reidy Creek, and Lake Hodges Reservoir) are better protected (City of Escondido 2017).

City of Escondido Storm Water Design Manual (BMP Design Manual)

The City of Escondido Storm Water Design Manual establishes development and redevelopment requirements to reduce storm water pollution to the maximum extent possible as required in the MS4 Permit. The City worked with other San Diego Copermitees to develop and adopt the Best Management Practice (BMP) Design Manual to replace the Countywide Model Standard Urban Stormwater Mitigation Plan (SUSMP) in December 2015, and the effective date was February 16, 2016. The Storm

Water Design Manual addresses post-construction urban runoff pollution requirements from new development and redevelopment projects ("priority project" categories) for reducing pollutant loads and maintaining pre-project runoff flow rates, velocities, and durations. "Priority projects" include, but are not limited to, automotive repair shops, restaurants, certain fueling stations and parking lots, industrial or commercial developments over one acre, and hillside developments over 5,000 square feet. In the instance where a project feature, such as a parking lot, falls into a priority project category, the entire project footprint is subject to Storm Water Design Manual requirements. The Storm Water Design Manual outlines methods to control site-specific pollutants, manage discharge rates, and/or remove pollutants via standard BMPs (and variations thereof) for various types of projects (City of Escondido 2016).

City of Escondido Plans, Programs, Policies, and Regulations

City General Plan

The General Plan includes the Resource Conservation Element. This element includes a number of goals and policies that address maintaining water resources and storm water quality within the City and minimizing potential effects of water quality degradation on downstream water bodies. Applicable goals and policies related to the proposed project are listed below. The Mobility and Infrastructure Element also includes storm drainage goals and policies that are applicable to the proposed project and are included in the list below. Refer to Section 3.10, Land Use and Planning for an analysis of proposed project consistency with City General Plan Resource Element goals and policies.

Water Resources and Quality Goal 6: Preservation and protection of the City's surface water and groundwater quality and resources.

Water Resources and Quality Policy 6.2: Protect the surface water resources in the city including Lake Wohlford, Dixon Lake, Lake Hodges, Escondido Creek, and other waterways.

Water Resources and Quality Policy 6.3: Protect the sustainability of groundwater resources.

Water Resources and Quality Policy 6.4: Require new development to preserve areas that provide opportunities for groundwater recharge (i.e., areas where substantial surface water infiltrates into the groundwater), storm water management, and water quality benefits.

Water Resources and Quality Policy 6.6: Control encroachments into wetlands and designated floodways to protect the community's water resources.

Water Resources and Quality Policy 6.12: Regulate construction and operational activities through the use of storm water protection measures in accordance with the City's National Pollution Discharge Elimination System (NPDES) permit.

Water Resources and Quality Policy 6.14: Require new development to protect the quality of water resources and natural drainage systems through site design and use of source controls, storm water treatment, runoff reduction measures, best management practices, and Low Impact Development measures.

Water Resources and Quality Policy 6.15: Protect Escondido's shallow groundwater basin from contamination by regulating storm water collection and conveyance to ensure pollutants in runoff have been reduced to the maximum extent practicable.

Storm Drainage Goal 4: Provision of adequate and sustainable infrastructure that is environmentally sensitive to serve residents, businesses, and property.

Storm Drainage Policy 14.2: Improve the existing storm drainage system by correcting identified deficiencies.

Storm Drainage Policy 14.3: Levy Drainage Fees for subdivided and developed land to finance drainage improvements. Periodically review and adjust for inflation, construction costs, and changes in land development intensities and timing.

Storm Drainage Policy 14.5: Require new development to prepare drainage studies and improvement plans that demonstrate no net increase in stormwater runoff and compliance with adopted stormwater plans.

Storm Drainage Policy 14.6: Require new development to minimize alterations to natural land-forms and the amount of impervious surfaces to minimize erosion, while encouraging implementation of low impact development measures and the maximum use of natural drainage ways, consistent with sound engineering and best management practices.

Storm Drainage Policy 14.7: Require new development and redevelopment to minimize storm water runoff and contaminants entering drainage facilities by incorporating low impact development measures and other on-site design features such as bio-swales, retention ponds, and cisterns for storage and infiltration, treatment of flows, and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).

Storm Drainage Policy 14.8: Mitigate negative impacts to adjacent surrounding land uses from pertinent drainageway corridors by incorporating appropriate structural and non-structural best management practices (BMPs). BMP"s may include the use of screening, landscaping, or open space setbacks.

Storm Drainage Policy 14.9: Promote the joint use of stormwater drainage facilities for recreation and conservation purposes, such as integrating sports fields in detention basins, or trails along drainage courses.

Storm Drainage Policy 14.12: Design stormwater facilities to minimize the need for frequent maintenance.

Storm Drainage Policy 14.13: Design and maintain detention facilities that are environmentally sustainable and compatible with surrounding uses to maximize vector control, manage flows, and maximize opportunities for conservation of water.

City Municipal Code

Article 55, Grading and Erosion Control Ordinance

Article 55 of the City Municipal Code establishes the grading and erosion control regulations for the City. The purpose of this article is to assure that development occurs in a manner which protects the natural and topographic character and identity of the environment, the visual integrity of hillsides and ridgelines, sensitive species and unique geologic/geographic features, and the health, safety, and welfare of the general public. This Article regulates grading on private and public property and provides standards and design criteria to control stormwater and erosion during construction activities. The ordinance sets forth rules and regulations to control excavation, grading, earthwork construction

(including fills and embankments), and development on hillsides and along ridgelines; establishes the administrative procedure for issuance of permits; and provides for approval of plans and inspection of grading construction necessary for compliance with stormwater management requirements.

Article 2, Stormwater Management and Discharge Control Regulations

Chapter 22 of City Municipal Code establishes regulations related to stormwater management and discharge control, harmful waters and wastes, sewer service charges, private sewage disposal systems, sewer connection fees, sewer connection laterals, and industrial wastewaters. The purpose of the stormwater management and discharge control regulations (Article 2) identified in this ordinance is to ensure the health, safety, and general welfare of the citizens of the City by controlling non-stormwater discharges to the stormwater conveyance system. This is achieved by eliminating discharges to the stormwater conveyance system from spills, dumping, or disposal of solid or liquid waste other than stormwater and by preventing, eliminating, or reducing pollutants in urban stormwater discharges to the maximum extent practicable.

Article 2 prohibits the discharge of anything except stormwater into a stormwater conveyance system, prohibits illegal connections to the stormwater drainage system, and requires any person owning or occupying property through which a natural watercourse of a stormwater conveyance system passes to maintain the area free of debris and other obstacles.

Article 19, Floodplain Management

Article 19 of Chapter 6 of the City Municipal Code establishes the procedures for floodplain management within the City. This article includes regulations to: restrict or prohibit uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities; require that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction; control the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel floodwaters; control filling, grading, dredging, and other development which may increase flood damage; and, prevent or regulate the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

3.9.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts related to hydrology and water quality. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1:** Violate any water quality standards or waste discharge requirements or other substantially degrade surface or groundwater quality.
- **Threshold #2:** Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- **Threshold #3:** 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.

- **Threshold #4:** 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.
- **Threshold #5:** 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.
- **Threshold #6:** 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.
- **Threshold #7:** In flood hazards, tsunami or seiche zones, risk release of pollutants due to project inundation.
- **Threshold #8:** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.4 Project Impact Analysis

3.9.4.1 Proposed Project Drainage and Stormwater Management

The project proposes multiple attached residential buildings, supported by private driveways, parking spaces and landscape areas. The project's frontage improvements would result in additional paving widths, curb and gutter, and sidewalk. Proposed finished grades in the development areas are expected to be mild (0.5% to 1.0% range), with manufactured slopes along the perimeter.

The project proposes to use combination facilities to provide treatment of site runoff, hydromodification mitigation and peak flow attenuation. Site drainage will consist of paved private streets with curbs and surface gutters, and private storm drains that direct site runoff to three stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. Basin 1 would be 3,180 square feet (s.f.), Basin 2 would be 4,580 s.f. and Basin 3 would be 2,000 s.f. These basins would serve as both retention and biofiltration features. These water quality basins would be maintained by the Homeowners Association.

In addition to the biofiltration and retention features, which are considered structural BMPs, the proposed project would also incorporate source control and site design BMPs as identified in the preliminary SWQMP for the proposed project (Appendix J2). Source control BMPs include, but are not limited to:

- Preventing illicit discharges into the MS4;
- Stenciling the future on-site public road storm drain inlets;
- Protecting trash storage areas from rainfall, run-on, runoff, and wind dispersal; and
- Additional BMPs based on potential sources of runoff pollutants including on-site storm drain inlets, future indoor and structural pest control, landscape/outdoor pesticide use, refuse areas, fire sprinkler test water, miscellaneous drain or wash water, plazas, sidewalks, and parking lots.

Site design BMPs include, but are not limited to:

- Minimizing impervious areas;
- Runoff collection, and
- Landscaping with native or drought tolerant species.

These BMPs have been designed in a manner to be consistent with the requirements of the City's Water Design Manual which requires that no pollutants are discharged to the MS4s. Per the Water Design Manual (Page 1-5) all development projects, or phases of development projects, are required to implement temporary erosion, sediment, good housekeeping and pollution prevention BMPs to mitigate storm water pollutants during the construction phase.

Bypass Storm Drain

The westerly boundary includes a shallow low flow channel which is conveyed easterly through the project site, then southerly along existing street paving to the upstream end of the box culvert which passes under North Iris Lane. Flows are then conveyed easterly by the paved concrete channel located at the southern limits of Meadowbrook Village development to Reidy Creek (approximately 700 feet).

The project grading will elevate the southerly portion of the site which will interrupt the off-site channel. A bypass storm drain system will intercept and direct these off-site flows around the site, avoiding the need to enlarge the post-development treatment and hydromodification systems. A concrete drainage ditch will be constructed along the westerly boundary to intercept local flows and direct them to the bypass inlet. The bypass storm drain begins at the western boundary leading to the existing box culvert undercrossing to the south side of the North Iris Lane. In addition to intercepting the upstream flows, site discharge and runoff from the project frontage and the neighborhood to the south (Cheyenne Lane) will be captured.

3.9.4.2 Water Quality Standards

Threshold #1: Violate any water quality standards or waste discharge requirements or other substantially degrade surface or groundwater quality.

Pollutants generated by development projects could include sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides. These pollutants can make their way to drainages and watercourses where they can degrade surface water quality, and in some cases groundwater quality. The project site is tributary to Reidy Creek, located 700 feet east of North Iris Lane, which flows three miles south to Escondido Creek channel, and then westerly 15 miles to the San Elijo Lagoon and ultimately the Pacific Ocean. As identified above, impaired water bodies in the Escondido Creek system, within which the project site is located, include Escondido Creek and San Elijo Lagoon.

The proposed project would comply with all applicable water quality standards and waste discharge requirements. The project includes a comprehensive water quality management approach that includes the use of biofiltration with partial retention, source control BMPs, and site design BMPs to ensure that there would not be an increase in pollutant discharge to receiving waters. No flow-thru treatment BMPs are proposed to be implemented on site in lieu of retention or biofiltration. The stormwater management design for the project was developed to be consistent with the Priority Development Project (PDP) requirements of the City of Escondido Storm Water Design Manual (BMP Design Manual) (City of Escondido 2016). The Stormwater Design Manual provides the guidance

necessary to comply with the City of Escondido Municipal Code (Chapter 22, Article 2) and regional MS4 Permit (RWQCB San Diego Region Order R9-2013-0001 as amended). This order indicates that discharges from MS4s must not cause or contribute to the violation of water quality standards in any receiving water (RWQCB 2015, Page 18).

In accordance with NPDES regulations, the State requires that any construction activity that disturbs one acre or more must obtain a General Construction Activity Stormwater Permit. Permit applicants are required to prepare a SWPPP and implement BMPs, including erosion and sediment control and non-stormwater management measures, to reduce construction effects on receiving water quality. Since the proposed project includes disturbance to more than one acre, a General Construction Activity Stormwater Permit from the SWRCB would be required prior to the issuance of a grading permit. A SWPPP would also be developed and implemented. Preparation and implementation of the SWPPP would ensure compliance with the provisions of the NPDES General Permit.

As previously noted, the proposed project has been designed to comply with the land development requirements of Order R9-2013-0001 as amended and the City's Stormwater Design Manual. These requirements were used to recommend BMPs for the proposed project to ensure there would be no impacts. The proposed project is therefore in compliance with the RWQCB MS4 permit. In summary, the proposed project would not violate any water quality standards or waste discharge requirements. Impacts would be **less than significant**.

3.9.4.3 Groundwater Supplies and Recharge

Threshold #2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

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. The project would not impede sustainable groundwater management of the basin. **Impacts are less than significant.**

3.9.4.4 Change in Drainage Patterns

Threshold #3: 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.

Threshold #4: 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.

Threshold #5: 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.

Threshold #6: 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.

This section analyzes the potential for the proposed project to alter existing drainage patterns of the site in a way that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner that could result in flooding; create or contribute to runoff water in exceedance of planned drainage system capacity; and impede or redirect flows.

Short Term (Project Construction)

The project site is currently developed with four residences. Grading will be required to prepare the site. The proposed project would incorporate construction BMPs in compliance with the General Construction Permit and SWPPP. In addition to the retention and biofiltration features, which are considered structural BMPs, the proposed project would also incorporate source control and site design BMPs as identified in the preliminary SWQMP for the proposed project (Appendix J2). Source control BMPs include, but are not limited to: 1) preventing illicit discharges into the MS4, 2) stenciling the future on-site public road storm drain inlets, 3) protecting trash storage areas from rainfall, run-on, runoff, and wind dispersal, and 4) additional BMPs based on potential sources of runoff pollutants including on-site storm drain inlets, future indoor and structural pest control, landscape/outdoor pesticide use, refuse areas, fire sprinkler test water, miscellaneous drain or wash water, plazas, sidewalks, and parking lots.

Site design BMPs include: 1) minimizing impervious areas, 2) runoff collection, and 3) landscaping with native or drought tolerant species. These BMPs have been designed in a manner to be consistent with the requirements of the City's Storm Water Design Manual which requires that no pollutants are discharged to the MS4s. Per the Storm Water Design Manual (Page 1-5) all development projects, or phases of development projects, are required to implement temporary erosion, sediment, good housekeeping and pollution prevention BMPs to mitigate storm water pollutants during the construction phase.

In addition, the project would be required to prepare a SWPPP and implement BMPs, including erosion and sediment control and non-stormwater management measures, to reduce construction effects on receiving water quality. With implementation of SWQMP and SWPPP BMPs, construction activities would not alter existing drainage patterns of the site in a way that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner that could result in flooding; create or contribute to runoff water in exceedance of planned drainage system capacity; or impede or redirect flows.

Long Term (Project Operation)

The proposed project would increase the area of impervious surface on the project site. If not carefully planned for, increased runoff from impervious surfaces could cause alterations to drainage courses or an increase in runoff that could increase erosion and siltation, cause flooding, exceed capacity of existing stormwater drainage systems, and impede or redirect flows. However, the proposed project has been designed to carefully handle runoff and to meet regulatory requirements to ensure that post-development runoff quantities and rates are similar to or less than the pre-development condition.

The project proposes to use combination facilities to provide water quality treatment of site runoff, hydromodification mitigation and peak flow attenuation. Site drainage would consist of paved private streets with curbs and surface gutters, and private storm drains that direct site runoff to three

stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. These basins would serve as both retention and biofiltration features. These water quality basins would be maintained by the Homeowners Association.

The existing storm drain system conveys on-site and off-site flows to Reidy Creek, then to Escondido Creek channel, and then westerly 15 miles to the San Elijo Lagoon, and ultimately the Pacific Ocean. The project's drainage pattern would largely match existing conditions. Currently, the site's westerly boundary includes a shallow low flow channel which is conveyed easterly through the project site, then southerly along existing street paving to the upstream end of the box culvert which passes under North Iris Lane. Flows are then conveyed easterly by the paved concrete channel located at the southern limits of Meadowbrook Village development to Reidy Creek (approximately 700 feet).

The project grading will elevate the southerly portion of the site which will interrupt the off-site channel. However, a bypass storm drain system would intercept and direct these off-site flows around the site, avoiding the need to enlarge the post-development treatment and hydromodification systems. A concrete drainage ditch will be constructed along the westerly boundary to intercept local flows and direct them to the bypass inlet. The bypass storm drain would begin at the western boundary, leading to the existing box culvert undercrossing to the south side of the North Iris Lane. In addition to intercepting the upstream flows, site discharge and runoff from the project frontage and the neighborhood to the south (Cheyenne Lane) would be captured. Based upon the site basin modeling and the flow comparison, the 100-year post-development peak flows would be consistent with the existing conditions (SB&O 2022).

The Preliminary Drainage study for the proposed project identifies the pre- and post-development conditions for runoff rates and quantities (SB&O 2022, Section 9). The 100-year existing/pre-development flows from the project area are approximately 19.17 cubic feet per second (cfs). In the post-development condition, the flows would increase to 38.96 cfs. However, with hydromodification/detention facilities, the peak outflows would be reduced to 19.19 cfs. Therefore, the 100-year post-development peak site discharge would be consistent with existing conditions. Implementation of the proposed project would not increase the rate or quantities of runoff beyond the pre-development condition. The proposed project would therefore meet the applicable peak flow discharge requirements (SB&O 20212).

Substantial Erosion or Siltation

The proposed project would not generate increased runoff volumes and incudes a comprehensive approach to stormwater and drainage management. The proposed project would incorporate construction BMPs in compliance with the General Construction Permit and SWPPP, including erosion and sediment control and non-stormwater management measures intended to reduce construction effects on receiving water quality. In addition to the retention and biofiltration features, which are considered structural BMPs, the proposed project would also incorporate source control and site design BMPs as identified in the preliminary SWQMP for the proposed project (Appendix J2). These BMPs have been designed in a manner to be consistent with the requirements of the City's Storm Water Design Manual (BMP Design Manual) which requires that no pollutants are discharged to the MS4s. Per the Storm Water Design Manual (Page 1-5) all development projects, or phases of development projects, are required to implement temporary erosion, sediment, good housekeeping and pollution prevention BMPs to mitigate storm water pollutants during the construction phase. Therefore, with implementation of BMPs, the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site (e.g., downstream). Impacts would be **less than significant**.

Flooding

Per FEMA's Flood Insurance Rate Map Numbers 06078C0811G and 06073C0813G, the project site is not located within a 100-year flood hazard area (FEMA 2012). As described above, the proposed project would increase the area of impervious surface on the project site which could increase runoff flow rates or volumes. However, the proposed project has been designed to carefully handle runoff and meet regulatory requirements to ensure that post-development runoff quantities and rates are similar to the pre-development condition. Per the Preliminary Drainage Study, with hydromodification/ detention facilities, the peak outflows would be 19.19 cfs which is consistent with existing conditions (SB&O 2022). Therefore, the proposed project would not substantially alter the existing drainage patterns of the site 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. Impacts would be **less than significant**.

Increase in Polluted Runoff/ Exceedance of Storm Drain System Capacity

As explained above, the project's drainage pattern would largely match existing conditions. Site drainage will consist of paved private streets with curbs and surface gutters, and private storm drains that direct site runoff to three stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. Project grading along the southerly portion of the site would interrupt an existing shallow low flow channel along the site's westerly boundary. However, a bypass storm drain system would intercept and direct these off-site flows around the site, avoiding the need to enlarge the post-development treatment and hydromodification systems. In addition to intercepting the upstream flows, site discharge and runoff from the project frontage and the neighborhood to the south would be captured. Based upon the site basin modeling and the flow comparison, the 100-year post-development peak flows would be consistent with the existing conditions (SB&O 2022).

The proposed project would not generate increased runoff volumes. Additionally, project-related runoff would be adequately treated prior to discharge into planned drainage systems via biofiltration and BMPs, such that the proposed project would not provide substantial additional sources of polluted runoff (SB&O 2021). Therefore, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Impacts would be **less than significant**.

Impede or Redirect Flows

As identified above, the proposed project would increase the area of impervious surface on the project site which could increase runoff flow rates or volumes; however, the project has been designed to carefully handle runoff and meet regulatory requirements to ensure that post-development runoff quantities and rates are similar or less than the pre-development condition. Per the Preliminary Drainage Study, with hydromodification/ detention facilities, the peak outflows would be 19.19 cfs which is consistent with existing conditions (SB&O 2022).

As discussed, project grading along the southerly portion of the site would interrupt an existing shallow low flow channel along the site's westerly boundary. However, a bypass storm drain system would intercept and direct these off-site flows around the site, avoiding the need to enlarge the post-development treatment and hydromodification systems. In addition to intercepting the upstream flows, site discharge and runoff from the project frontage and the neighborhood to the south would be captured. Based upon the site basin modeling and the flow comparison, the 100-year post-development peak flows would be consistent with the existing conditions (SB&O 2021). Therefore, the

proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would impede or redirect flood flows. Impacts would be **less than significant**.

3.9.4.5 Flood Hazards, Tsunami or Seiche Zones

Threshold #7: In flood hazards, tsunami or seiche zones, risk release of pollutants due to project inundation.

Flood Hazard

Federal Insurance Rate Maps (FIRMs) are the official maps created and distributed by FEMA and the National Flood Insurance Program (NFIP). FIRMs delineate Special Flood Hazard Areas (SFHAs), which are areas subject to inundation by the base flood, for every city and community that participates in the NFIP. FIRMs contain flood risk information based on historic, meteorological, hydrologic, and hydraulic data, as well as open space conditions, flood control works, and development. Per FEMA's Flood Insurance Rate Map Numbers 06078C0811G and 06073C0813G, the project site is located with Zone X, Area of Minimal Flood Hazard and is not located within a 100-year flood hazard area (FEMA 2012). Also, per the City's General Plan EIR, the project site is not identified as being in a Flood Hazard Area (Figure 4.9-3) or within a Damn Inundation Area (Figure 4.9-2) (City of Escondido 2012b). Therefore, implementation of the proposed project would not risk release of pollutants due to project inundation in a flood hazard area.

Tsunami

A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. Tsunamis can cause flooding to coastlines and inland areas less than 50 feet above sea level and within one mile of the shoreline. In San Diego, wave heights and run-up elevations from tsunamis have historically fallen within the normal range of tides (one to four feet in height). At the most risk for tsunamis is the coast of San Diego. The City of Escondido is located much more than one mile inland and would not be susceptible to inundation or flooding due to a tsunami (City of Escondido 2012b).

Due to historic record and the location of the project site, approximately 25 miles away from the coastline, the proposed project area has a low likelihood of being inundated by a tsunami. Therefore, implementation of the proposed project would not risk release of pollutants due to project inundation by a tsunami.

Seiche

A seiche is a standing wave in a completely or partially enclosed body of water. The size of a seiche and the affected inundation area is dependent on different factors including size and depth of the water body, elevation, source, and if manmade, the structural condition of the body of water in which the seiche occurs. Areas located along the shoreline of a lake or reservoir are susceptible to inundation by a seiche. High winds, seismic activity, or changes in atmospheric pressure are typical causes of seiches.

In the City's semi-arid climate, naturally occurring enclosed water bodies are not common. Instead, most enclosed water bodies are reservoirs built by local municipalities and water districts to provide water service to local residents and businesses, including Lake Wohlford and Lake Dixon. Typically, all land around a reservoir's shoreline is in public holdings, which restrict private land development and

minimize risk of inundation from seiches. The project site is located approximately 2.5 miles west of Dixon Lake, five miles west of Lake Wohlford, 5.5 miles north of Lake Hodges and seven miles west of Lake San Marcos. Due to distance, the project site is unlikely to be affected by a seiche. Therefore, implementation of the proposed project would not risk release of pollutants due to project inundation by a seiche.

Summary

The project site is not located in a flood, tsunami or seiche hazard area. Therefore, the project would not risk release of pollutants due to project inundation. **No impact** is identified.

3.9.4.6 Water Quality Control Plan/Sustainable Groundwater Management Plan

Threshold #8: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Short Term

The project site is currently developed with four residences. Grading will be required to prepare the site. Potential construction-related impacts to receiving water quality could include siltation and erosion, the use of fuels for construction equipment, and the generation of trash and debris from the construction site. In accordance with NPDES regulations, the project will be required to secure a General Construction Activity Stormwater Permit, which will require the preparation of a SWPPP and implementation of BMPs. Examples of typical BMPs implemented in SWPPPs that could be applicable to the project include using temporary mulching, seeding, or other suitable stabilization measures to protect uncovered soils; storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or surface water; developing and implementing a spill prevention and cleanup plan; installing traps, filters, or other devices at drop inlets to prevent contaminants from entering storm drains; and using barriers, such as straw bales or plastic, to minimize the amount of uncontrolled runoff that could enter drains or surface water. These measures are designed to minimize the generation of pollutants, including sediment and trash/debris and would ensure that the proposed project would not result in significant alteration of receiving water quality during construction. Impacts would be **less than significant**.

Long Term (Project Operation)

As identified above, impaired water bodies in the Escondido Creek system, within which the project site is located, include San Elijo Lagoon and Escondido Creek. Potential pollutants to be generated by development projects include sediment, nutrients, heavy metals, organic compounds, trash/debris, oxygen demanding substances, oil/grease, and bacteria/viruses.

Buildout of the proposed project would increase the amount of imperviousness at the project site; however, based upon the analysis in the preliminary SWQMP prepared for the proposed project, the proposed project includes a comprehensive water quality management approach that incorporates biofiltration features and source control and site design BMPs to ensure that there would not be an increase in pollutant discharge to receiving waters. The biofiltration features and BMPs would also be subject to regular inspection and maintenance as per the preliminary SWQMP (Appendix J2).

The stormwater management design for the project was developed to be consistent with the PDP requirements of the City of Escondido Storm Water Design Manual (BMP Design Manual) (City of Escondido 2016). The Stormwater Design Manual provides the guidance necessary to comply with the

City of Escondido Municipal Code (Chapter 22, Article 2) and regional MS4 Permit (RWQCB San Diego Region Order R9-2013-0001 as amended). This order indicates that discharges from MS4s must not cause or contribute to the violation of water quality standards in any receiving water (RWQCB 2015, Page 18).

Therefore, the project's water quality management approach would effectively treat stormwater runoff prior to discharge from the site and to receiving waters. The proposed project would not result in significant alteration of receiving water quality following construction. Further, the project would have no impact on groundwater. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be **less than significant.**

3.9.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to hydrology/water quality, the cumulative analysis is based upon a list approach to determine the proposed project's contributing effect on potential cumulative impacts on hydrology/water quality. All of the cumulative projects identified in Table 2-3 are considered in this cumulative analysis.

Hydrology

Development of the proposed project and cumulative projects would increase the amount of impervious surfaces. This would potentially result in increased surface runoff, alteration of the regional drainage pattern, and flooding. However, like the proposed project, each individual project applicant would be required to hydrologically engineer the respective project sites to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. Runoff volume from the project site in the post-development condition is the same as in the pre-development condition due to the implementation of a comprehensive drainage plan, including the use of biofiltration facilities and BMPs. Therefore, the proposed project's contribution to a cumulative impact from a hydrology perspective is **less than significant**.

Water Quality

Development of the proposed project, in conjunction with cumulative projects that drain to the Escondido Creek Hydrologic Area, has the potential to increase the concentration of pollutants in surface runoff and downstream water quality. However, all cumulatively considered projects would be subject to the same federal water quality standards and state waste discharge requirements that the proposed project is subject to. This includes preparation of project-specific SWPPPs per the NPDES permit program and implementation of associated BMPs to prevent construction-related runoff from polluting receiving waters. Additionally, the proposed project has been designed to incorporate biofiltration and BMPs to limit the potential for water quality impacts to the greatest extent feasible. By incorporating these features into the project design, the proposed project would not substantially contribute to a significant cumulative impact to water quality. Impacts would be **less than significant**.

3.9.6 Mitigation Measures

Based upon the analysis presented in Section 3.9.4 and 3.9.5, no impacts were identified, and no mitigation measures are required.

3.9.7 Conclusion

Water Quality Standards

The project would be required to implement a project-specific SWPPP per the NPDES permit program and implementation of associated BMPs to prevent construction-related runoff from polluting receiving waters. Additionally, the proposed project has been designed to incorporate biofiltration and other source and site control BMPs to limit the potential for water quality impacts to the greatest extent feasible. The proposed project has been designed to comply with the land development requirements of Order R9-2013-0001 as amended and the City's Stormwater Design Manual. The proposed project is therefore in compliance with the RWQCB MS4 permit. In summary, the proposed project would not violate any water quality standards or waste discharge requirements. Impacts would be **less than significant**.

Groundwater Supplies and Recharge

Implementation of the project would not use any groundwater, nor would it 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. Therefore, the project would not impede sustainable groundwater management of the basin. Impacts would be **less than significant.**

Change in Drainage Patterns

The project would be required to prepare a SWPPP and implement BMPs, including erosion and sediment control and non-stormwater management measures, to reduce construction effects on receiving water quality. With implementation of SWQMP and SWPPP BMPs, construction activities would not alter existing drainage patterns of the site in a way that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner that could result in flooding; create or contribute to runoff water in exceedance of planned drainage system capacity; or impede or redirect flows.

Development of the proposed project would increase the amount of impervious surfaces. This would potentially result in increased surface runoff, alteration of the regional drainage pattern, increase in runoff and flooding. However, the site has been carefully designed to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. Post-development flows would be the same as in the pre-development condition due to the implementation of a comprehensive drainage plan, including the use of biofiltration facilities and BMPs. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that could result in flooding; create or contribute to runoff water in exceedance of planned drainage system capacity, or impede or redirect flows. Short term and long term impacts would be **less than significant**.

Flood Hazard, Tsunami or Seiche Zones

The project site is not located in a flood, tsunami or seiche hazard areas. Therefore, the project would not risk release of pollutants due to project inundation. **No impact** is identified.

Water Quality Control Plan/ Sustainable Groundwater Management Plan

Impaired water bodies in the Escondido Creek system, within which the project site is located, include San Elijo Lagoon and Escondido Creek. In accordance with NPDES regulations, the project will be required to secure a General Construction Activity Stormwater Permit, which will require the preparation of a SWPPP and implementation of BMPs. These measures are designed to minimize the generation of pollutants, including sediment and trash/debris and would ensure that the proposed project would not result in significant alteration of receiving water quality during construction.

Based upon the analysis in the preliminary SWQMP prepared for the proposed project, the proposed project includes a comprehensive water quality management approach that incorporates biofiltration features and source control and site design BMPs to ensure that there would not be an increase in pollutant discharge to receiving waters. The biofiltration features and BMPs would also be subject to regular inspection and maintenance as per the preliminary SWQMP (Appendix J2). The stormwater management design for the project was developed to be consistent with the PDP requirements of the City of Escondido Storm Water Design Manual (BMP Design Manual) (City of Escondido 2016), which provides the guidance necessary to comply with the City of Escondido Municipal Code (Chapter 22, Article 2) and regional MS4 Permit (RWQCB San Diego Region Order R9-2013-0001 as amended). This order indicates that discharges from MS4s must not cause or contribute to the violation of water quality standards in any receiving water (RWQCB 2015, Page 18).

Therefore, the project's water quality management approach would effectively treat stormwater runoff prior to discharge from the site and to receiving waters. The proposed project would not result in significant alteration of receiving water quality following construction. Further, the project would have no impact on groundwater. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be **less than significant.**

3.10 Land Use and Planning

This section analyzes the potential for the proposed project to have impacts related to land use and planning. This section includes the existing setting of the project site with respect to land use and planning, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed project.

General information in this section is taken from the Escondido General Plan Update (City of Escondido 2012a), and the General Plan Program EIR (City of Escondido 2012b) unless otherwise referenced.

3.10.1 Existing Conditions

This section describes the existing planning context for the project site, including the General Plan and Zoning designations that currently apply to the site.

Project Site

The 7.7-acre project site is located in the west-central portion of San Diego County in the northern portion of the City of Escondido at the southwest corner of North Iris Lane and Robin Hill Lane (Figures 2-1 and 2-2 in Chapter 2). The project is comprised of five parcels (APNs 224-310-05, -06, -07, -08 and -20) and is associated with the following addresses 2039, 2047, 2085 and 2089 North Iris Lane. The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City.

The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. The southern portion of the project site is currently used as a horse pasture. Current access to the project site is via two private driveways on North Iris Lane and one private driveway on Robin Hill Lane. Existing vegetation communities on the project site include urban/developed, non-native grassland, disturbed habitat, and non-native vegetation (Helix 2022).

Existing General Plan Designation

The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. Each planning area in the unincorporated County has a community or subregional plan. The project site is included in the North County Metro Community Plan. According to the County General Plan and North County Metropolitan Subregional Plan (County of San Diego 2011), the project site is designated as Village Residential (VR-24), which allows a maximum density of 24 units per acre. The Village Residential designations are intended to accommodate single-family or multi-family housing types, depending on the density. Generally, residential densities of 10.9 dwelling units (du) per acre or higher require multi-family development.

In the City's General Plan, the project site is identified as Suburban which allows for single family residential up to 3.3. du/acre. According to Figure II-6 of the Land Use Element of the City's General Plan, "This designation applies to areas that generally surround the urbanized core of the community and accommodates single family detached homes on relatively large lots. Development clustering is permitted pursuant to General Plan Residential Clustering Policies" (City of Escondido 2012a).

Existing Zoning Designation

The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24/du acre. As the site is within the County's jurisdiction, there is no City zoning for the site.

Surrounding Land Uses

The project site is bounded by Robin Hill Lane on the north with attached single family residential uses north of Robin Hill Lane that are in the City's jurisdiction and are zoned Planned Development – Residential (PDR) with an Urban 1 land use. To the west, the site is bounded by Robin Hill Lane and parcels within the County's jurisdiction that are developed with single family residences. Those parcels have a General Plan Designation of Village Residential VR-24 and are zoned RS – Single Family. To the south, the site is bounded by single family residences in the City that are zoned R-1. To the east, the site is bounded by North Iris Lane with the three-story Meadowbrook Village care facility (a mix of semi-independent and congregate care units) zoned R-1 and single family residential east of North Iris Lane, southeast of the project site, zoned PD-R-1 in the City.

3.10.2 Regulatory Framework

3.10.2.1 State Regulations

California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law, Government Code Sections 65000 et seq. Under state planning law, each city and county is required to adopt a General Plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning" (Section 65300). The California Supreme Court has called the General Plan the "constitution for future development." The General Plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. A General Plan consists of several elements, including land use, circulation, housing, conservation, open space, noise, and safety; other elements may be included at the discretion of the jurisdiction that relate to the physical development of the county or city.

Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning (NCCP) Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land uses. The California Department of Fish and Wildlife is the principal state agency implementing the NCCP Program. The NCCP Act established a process to allow for comprehensive, regional multi-species planning in a manner that satisfies the requirements of the state and federal Endangered Species Acts through a companion regional habitat conservation plan. The NCCP program has provided the framework for the state, local governments, and private interests to plan for the protection of regional biodiversity and ecosystems. The habitat conservation plans seek to ensure the long-term conservation of multiple species, while allowing for compatible and appropriate economic activity to proceed.

3.10.2.3 Regional/Local Regulations

Multiple Habitat Conservation Program (MHCP)

The MHCP, adopted by the San Diego Association of Governments (SANDAG) in March 2003, is a comprehensive, multiple-jurisdiction planning program designed to create, manage, and monitor an ecosystem preserve in northwestern San Diego County. It is one of several large, multiple-jurisdiction habitat planning efforts in the County, each of which constitutes a subregional plan under California's NCCP Act of 1991. The MHCP preserve system is intended to protect viable populations of native plant

and animal species and their habitats in perpetuity, while accommodating continued economic development and quality of life for residents of northern San Diego County. The MHCP replaces the traditional project-by-project approach to gaining approvals with a coordinated, comprehensive program that ensures that project mitigations are directed to those areas most critical to biological conservation, while allowing expedited development of less important habitat areas.

The MHCP subregion encompasses the seven incorporated cities of northwestern San Diego County (Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista). These jurisdictions are required to implement their portions of the MHCP through citywide subarea plans, which describe the specific policies each city will institute for the MHCP. The City of Escondido is the easternmost incorporated city within the MHCP. The draft Escondido MHCP Subarea Plan includes the incorporated city limits plus approximately 3,000 acres owned by the city in the unincorporated areas surrounding Lake Wohlford, Valley Center Road, and isolated parcels with existing or planned utility improvements.

The project site is not located within a Pre-Approved Mitigation Area (PAMA) targeted for conservation by the MHCP. Within the Draft Escondido SAP, the project site is not mapped as a Focused Planning Area (FPA), not designated as Constrained Lands outside the FPA and not located within the biological core and linkage area (BCLA). At this time, the city is not moving forward with the draft Escondido MHCP Subarea Plan; thus, there is no take coverage afforded under the draft Escondido MHCP Subarea Plan or the MHCP. Please refer to Section 3.3, Biological Resources for more specific details on the MHCP.

SANDAG San Diego Forward: The Regional Plan

The Regional Comprehensive Plan (RCP), adopted in 2004 by the San Diego Association of Governments (SANDAG), laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity.

In 2011, SANDAG approved the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included a sustainable communities strategy, consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the California Air Resources Board (CARB) as required by the 2008 Sustainable Communities Act. In 2010, CARB established targets for each region in California governed by a metropolitan planning organization. SANDAG is the metropolitan planning organization for the San Diego region.

The SANDAG target, as set by CARB, is to reduce the region's per capita emissions of greenhouse gas emissions from cars and light-duty trucks by 7% by 2020, compared with a 2005 baseline. By 2035, the target is a 13% per capita reduction. There is no target set beyond 2035. To achieve the 2020 and 2035 targets, SANDAG and other metropolitan planning organizations are required to develop a Sustainable Communities Strategy (SCS) as an element of its RTP. The SANDAG SCS integrates land use and transportation plans to achieve reductions in greenhouse gas emissions and meet the CARB-required targets.

On October 9, 2015, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan (Regional Plan). The Regional Plan combines the two previously described existing regional planning documents: the RCP and the RTP/SCS. The Regional Plan updates growth forecasts and is based on

the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the County. SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan, and other local General Plans of cities, may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. The General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG's RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years.

In 2019, the SANDAG Board of Directors adopted the San Diego Forward: The 2019 Federal Regional Transportation Plan. It combines the big-picture vision for how the region will grow by 2050 with an implementation program to help make that vision a reality. In December 2021, SANDAG adopted San Diego Forward: The 2021 Regional Plan.

San Diego County General Plan

The County General Plan was updated and adopted on August 3, 2011. The General Plan establishes future growth and development patterns for the unincorporated areas of the county, including the communities adjacent to the City of Escondido. The plan focuses population growth in the western areas of the County where infrastructure and services are available. The County General Plan update (County of San Diego 2011) improved the previous plan by balancing the need to accommodate growth with the needs to control traffic congestion, protect environmental habitat, and ease the strain on essential services such as water supplies and fire protection. The County General Plan contains numerous goals and policies aimed at respecting community character, climate change, infrastructure planning, and environmental preservation. The County General Plan's Land Use Element consists of maps, goals, and policies that guide the future pattern of development for the unincorporated County. The land use framework contains regional categories that broadly define land use designations that describe in greater detail land use types, housing densities, and development intensities. The County General Plan and use framework includes three regional categories: village, semirural, and rural lands. These categories broadly reflect the different character and land use development goals of the County's developed areas, from lower density residential and agricultural areas, to very low density or undeveloped rural lands. Higher density land use designations are concentrated in the western areas near the incorporated cities, including Escondido.

North County Metro Subregional Plan

Each planning area in the unincorporated County has a community or subregional plan, including North County Metro. Each community plan or subregional plan supplements the County General Plan by focusing on a particular planning area. Community and subregional plans contain information and policies concerning land use, housing, circulation, conservation, public facilities and services, recreation, and community character. Other issues may be addressed depending on the circumstances in a particular community. The North County Metro Community Planning Area covers the area surrounding the proposed project site.

According to the County General Plan and North County Metropolitan Subregional Plan (County of San Diego 2011), the project site and County land to the west of the site are designated as Village Residential (VR-24), which allows a maximum density of 24 units per acre. The Village Residential designations are intended to accommodate single-family or multi-family housing types, depending on

the density. Generally, residential densities of 10.9 dwelling units (du) per acre or higher require multi-family development.

City of Escondido General Plan

The City of Escondido has numerous policies, programs, codes, and ordinances that regulate land use development. Policies and regulations that indirectly affect land use planning, such as aesthetics, cultural resources, noise, hazards and hazardous materials, geology and soils, hydrology and water quality, air quality, and utilities and service systems regulations, are included in other sections in Chapter 3 of this EIR.

The City General Plan provides goals, policies, and programs intended to guide future land use and development decisions within the City. All applicable goals and policies related to the project site within the General Plan are included in **Table 3.10-1**.

In the City's General Plan, the project site is currently identified as Suburban which allows for single family residential up to 3.3. du/acre. According to Figure II-6 of the Land Use Element of the City's General Plan, "This designation applies to areas that generally surround the urbanized core of the community and accommodates single family detached homes on relatively large lots. Development clustering is permitted pursuant to General Plan Residential Clustering Policies" (City of Escondido 2012a).

The requested City General Plan designation upon annexation is Urban III (U3). City General Plan, Figure II-6, General Plan Land Use Designations describes the Urban III designation as accommodating a wide range of housing types and generally applies to transitional areas that exist between single family neighborhoods and higher density residential and commercial areas (page II-20).

City of Escondido Zoning Ordinance

The City's Zoning Ordinance, provided in Chapter 33 of the Municipal Code, is the primary way that the City administers the General Plan. The General Plan identifies general land use designations, while the Zoning Ordinance identifies specific uses and development standards within these land use designations. The purpose of the Zoning Ordinance is to serve the public health, safety, comfort, convenience, and general welfare by:

a. Regulating the use of buildings, structures, and land uses as between agriculture, industry, business, residence and other purposes;

b. Regulating signs and billboards;

c. Regulating the location, height, bulk, number of stories and size of buildings and structures; the size and use of lots, yards, courts and other open spaces; the percentage of a lot that may be occupied by a building or structure; and the intensity of land use;

d. Establishing requirements for off-street parking and loading;

e. Establishing and maintaining building setback lines;

f. Creation of civic districts around civic centers, public parks, public buildings or public grounds and establishing related regulations;

g. Establishment of general provisions and standards of development with the aim of preserving a wholesome, serviceable and attractive community; and

h. Establishing standards for landscaping and irrigation for commercial, industrial and residential development.

The Zoning Ordinance establishes development regulations for specific land uses, identified by zones, as well as overlay areas established in the General Plan, such as open space and floodplain areas. Additionally, some portions of the Municipal Code apply to all areas of the city, regardless of zone, such as Article 55, the Grading and Erosion Control Ordinance. The purpose of this article is to ensure that development occurs in a manner that protects the natural and topographic character and identity of the environment; the visual integrity of hillsides and ridgelines; sensitive species and unique geologic/geographic features; and the health, safety, and welfare of the general public by regulating grading on private and public property and providing standards and design criteria implementing best management practices to control storm water and erosion during all construction activities for all development.

Specific Zoning Ordinances that are related to the land use development process are listed below. Zoning Ordinance sections that pertain to specific environmental issues such as aesthetics, air quality, geology and soils, and hydrology and water quality are addressed in other sections of Chapter 3 of this EIR.

The project is requesting a Pre-zone to Planned Development- Residential (PD-R-13.2), with a density of 13.2 units/acre. The Zoning Ordinance describes the PD-R District as noted below under Article 19.

Article 19, Planned Development (P-D) Zone

The proposed project is requesting a pre-zone of the site to Planned Development (P-D); thus, this zone is described herein. The P-D zone has the following purposes (City of Escondido 2021):

a. Encouraging the development of parcels with comprehensive site planning and building design;

b. Providing a more flexible regulatory procedure by which the basic public purposes of the Escondido general plan and development policies may be accomplished for specific parcels;

c. Encouraging creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of several land uses and the design of facilities;

d. Promoting and creating public and private open space as an integral part of land development design;

e. Encouraging private development of older areas of the city or areas which are not conducive to development under traditional zoning designations;

f. Enhancing and preserving property with unique features, such as historical significance, sensitive biological resources, or unusual topography and landscape features. (Ord. No. 2017-03R, § 4, 3-22-17)

g. Establishment of general provisions and standards of development with the aim of preserving a wholesome, serviceable and attractive community; and

h. Establishing standards for landscaping and irrigation for commercial, industrial and residential development.

Article 19, Sec. 33-402 Residential Density Policy

Planned development residential densities shall be guided by the following:

(a) Residential planned developments may, and are encouraged to, depart from standard subdivision and housing design by providing a variety of lot sizes and housing types, provided that the overall residential density yield conforms with the city policy as determined in subsection (b) of this section, and provided residential amenities are incorporated in amounts and locations conducive to the establishment of a quality residential environment and/or residential environments of special social importance to the city.

(b) All planned developments in which residential uses are proposed shall be governed by the residential density set forth in the Escondido General Plan, or in any applicable specific plan, or any applicable area plan, or in official city plans and policies in process of preparation and adoption.

(c) For planned developments in which residential uses are proposed on lots or parcels of land in the R-3, R-4 and R-5 zones, area plans and specific plan areas with a maximum specified multifamily residential density, no planned development shall be improved or developed at a density below seventy (70) percent of the maximum permitted density of the underlying multifamily zone, area plan or specific plan multifamily designation. Exceptions to the minimum density requirement may be granted in writing as part of the planned development approved pursuant to section 33-408 provided the development will not preclude the city from meeting its housing needs as described in the Housing Element of the Escondido General Plan. Minimum density requirements shall not apply to property owners seeking to enhance or enlarge existing dwelling units or construct other accessory structures on a site. (Ord. No. 2017-03R, § 4, 3-22-17)

Article 47, Environmental Quality

Article 47, "Environmental Quality," implements the requirements of CEQA by applying the provisions and procedures contained in CEQA to development projects proposed within the city. The ordinance lists the criteria that would exempt a project from CEQA, establishes mitigation and reporting requirements, and establishes criteria that coordinate CEQA requirements with the City's quality of life standards to clarify how impacts identified for a project would affect its CEQA significance determinations. These criteria include air quality screening level thresholds for criteria pollutants, traffic level of service standards, and limits on allowable noise increases.

Article 64, Design Review

Article 64, "Design Review," requires design review of new development and modifications to existing development in order to preserve the natural charm, integrity, and quality of the built environment in the city. Article 64 also ensures that development is consistent with or exceeds the high quality of the development projects currently built in the city. Project applications subject to design review (e.g. development projects involving new construction; city-initiated public facilities projects; certain signs; proposed development standards for specific plans and overlay districts; and architectural modifications to certain industrial, commercial and multifamily residential developments) are reviewed by City Planning Division staff or at a regularly scheduled planning commission meeting at which the applicant is present. For discretionary projects which require public hearing, City Planning Division staff submit recommendations to the Planning Commission and/or City Council, which then consider the report in making its decision. On the other hand, for administrative projects that require Planning Division review, staff submit recommendations to the planning director. The elements of design consideration include site development, circulation, grading, setbacks, exterior appearance of buildings, structures, signs, lighting, street furniture, landscaping and other outdoor appurtenances.

3.10.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts related to energy. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1:** Physically divide an established community.
- **Threshold #2:** Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.10.4 Project Impact Analysis

The proposed project proposes 102 multi-family residential units situated on approximately 7.7 acres. Open space within the project would total 97,040 s.f. (approximately 2.22 acres) and includes a mix of common open space (64,247 s.f.), recreational areas (11,359 s.f.), and private open space (21,434 s.f.). Approval of the proposed project would require a number of discretionary actions from the City of Escondido as Lead Agency as well as Responsible and Trustee Agencies as described below.

City of Escondido (Lead Agency)

- Annexation/Reorganization from the County of San Diego into the City of Escondido
- General Plan Amendment from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre)
- Prezone/Rezone to Planned Development – No existing Zoning to Residential (PD-R 13.2) with a density of 13.2 units/acre
- Master and Precise Development Plan in accordance with Escondido Municipal Code, Chapter 33 – Zoning, 19. Planned Development (P-D Zone);
- Tentative Subdivision Map approval for the creation of one lot air-space units on the project site.

San Diego Local Agency Formation Commission (Responsible Agency)

- Approval of the Annexation/Reorganization into the City of Escondido
- Approval of the sewer annexation into the City's Sewer District

California Department of Fish and Wildlife (Trustee Agency)

- California Fish and Game Code Section 1602 Streambed Alteration Agreement for potential impacts on streambed.

U.S. Army Corps of Engineers (Responsible Agency)

- Clean Water Act Nationwide 39 Section 404 Permit for potential impacts on waters of the United States.

San Diego Regional Water Quality Control Board (Responsible Agency)

- National Pollutant Discharge Elimination System Construction Activities Storm Water General Permit for construction.
- Clean Water Act Section 401 Water Quality Certification for potential impacts on waters of the United States.

3.10.4.1 Physical Division of Established Community

Threshold #1: Physically divide an established community

The project site is currently developed with four single family residential units. The project proposes additional residential uses in an area that is already developed with similar uses, and as such, would be compatible with existing uses. A project could result in impacts related to the physical division of a community if new or widened roads would traverse an established community.

The project would make roadway and pedestrian improvements on North Iris Lane and Robin Hill Lane. Currently, along the project frontage, North Iris Lane has a 47-foot right-of-way, one travel lane in each direction and a sidewalk on the eastern side of the road. The proposed project would provide a 15-foot right-of-way dedication along the project frontage with North Iris Lane to create a 62-foot right of way, which would allow for wider travel lanes and a 4-foot sidewalk along the project frontage. The applicant would install approximately 850 feet of sidewalk along the project frontage with North Iris Lane. This would complete a missing section of sidewalk along North Iris Lane and improve pedestrian network connectivity for the neighborhood. Robin Hill Lane is currently a private roadway that is 20-feet wide with no sidewalk. Under the proposed project, the project would provide a 44-foot easement for a private driveway to provide for two 16-foot travel lanes, a 4-foot sidewalk and a 4.5-foot parkway on Robin Hill Lane. The project would install approximately 440 feet of sidewalk on Robin Hill Lane. The installation of sidewalks along the project frontage will improve pedestrian movement and connectivity in the project area. Therefore, the project would not physically divide an established community and **no impact** is identified for this issue area.

3.10.4.1 Conflict with Land Use Plans

Threshold #2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Plans and policies considered in this analysis include the Escondido General Plan, the City of Escondido zoning ordinance and the Multiple Habitat Conservation Program (MHCP).

Escondido General Plan

As identified above, the project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the city. According to the County General Plan and North County Metropolitan Subregional Plan (County of San Diego 2011), the project site is designated as Village Residential (VR-24), which allows a maximum density of 24 units per acre. In the City's General Plan, the project site is identified as Suburban which allows for single family residential up to 3.3. du/acre. Upon annexation, the property designation would change from VR-24, allowing up to 24 du/acre to Urban III, allowing only up to 18 du/acre.

The project proposes annexation/reorganization from the County of San Diego into the City of Escondido. According to the City's Land Use Element (Page II-87), approximately one-half of

Escondido's Planning Area involves territory that is located outside the city's municipal boundaries and governed by San Diego County (Figure II-30). Transitioning these properties into the city requires annexation through the Local Agency Formation Commission (LAFCO) and property owner involvement. Annexation policies are intended to ensure that the city's boundary expansions occur in a manner that are consistent with the General Plan's vision and meet Escondido's long term goals. As shown in **Table 3.10-1**, located at the end of this section, the project would be consistent with the annexation goals and policies outlined in the City's General Plan.

Once approved, the project will be consistent with the General Plan as the proposed project includes a General Plan Amendment (GPA) from Suburban to Urban III (up to 18 du/acre). According to Figure II-6 of the Land Use Element of the City's General Plan (Page II-21), Urban III is a medium density multi-family residential designation that would "accommodate a wide range of housing types and generally applies to transitional areas that exist between single family neighborhoods and higher density residential and commercial areas. This designation allows for a maximum density of 18 du/ac, minimum density of 12.6 du/acre, building height of 2-4 stories and street designs that support pedestrian and bicycle use along with vehicular circulation" (City of Escondido 2012a).

This GPA would allow for development of the proposed project including 102 multi-family residential units and common and private open space on 7.7 acres in an urbanized area of the city with existing residential uses to the north, south, and west of the project site. The project's proposed density is 13.2 du/ac.

Therefore, the proposed project would have a **less than significant** impact related to conflicting with the City General Plan and no mitigation measures would be required.

Zoning

As identified above, the current County zoning on the project site is Village Residential (VR-24), which allows for up to 24/du acre. As the site is within the County's jurisdiction, there is no City zoning for the site. The project is requesting a Pre-zone to Planned Development- Residential (PD-R-13.2), with a density of 13.2 units/acre. The project site would be subject to the requirements of the P-D Zone, as outlined in Article 19 of the Zoning Ordinance. Similarly, the project would be required to adhere to requirements in other applicable regulations in the Zoning Ordinance including, Article 55, the Grading and Erosion Control Ordinance and Article 64, Design Review. Therefore, the proposed project would have a **less than significant** impact related to City zoning, and no mitigation measures would be required.

MHCP

As identified above, the project site is not located within a PAMA targeted for conservation by the MHCP. Within the Draft Escondido SAP, the project site is not mapped as a Focused Planning Area (FPA), not designated as Constrained Lands outside the FPA and is not located within the biological core and linkage area (BCLA). As concluded in Section 3.3 Biological Resources, implementation of the proposed project would not conflict with, preclude or prevent finalizing and adoption of the Subarea plan. Additionally, the project will mitigate all biological resources impacts to below a level of significance. Therefore, the proposed project would have a **less than significant** impact related to the MHCP, and no mitigation measures would be required.

3.10.5 Cumulative Impact Analysis

No existing or reasonably foreseeable land use impacts were identified as a result of development of the proposed project because it would not result in the physical division of an established community or conflict with any plans adopted for the purposes of avoiding environmental impacts.

3.10.6 Mitigation Measures

Based upon the analysis presented in sections 3.10.4 and 3.10.5, land use and planning impacts would be less than significant; therefore, no mitigation measures are required.

3.10.7 Conclusion

Physical Division of an Established Community

The project site is currently developed with four single family residential units. The project proposes additional residential uses in an area that is already developed with similar uses, and as such, would be compatible with existing uses. No changes to the circulation system have been proposed. Therefore, the project would not physically divide an established community and **no impact** is identified for this issue area.

Conflict with an Applicable Land Use Plan

The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of avoiding environmental impacts, including the City's General Plan policies, Zoning Ordinance, and MHCP. As a result, impacts would be **less than significant.**

Table 3.10-1. Project Consistency with Applicable Escondido General Plan Goals and Policies

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Chapter I. Vision and Purpose		
Quality of Life Standards	**In conjunction with the General Plan Goals, Quality of Life Standards have been developed to establish minimum thresholds of service levels for various public improvements and facilities. Consistent with the policies set forth in the Growth Management Element (see Chapter VIII), the existing facilities will be evaluated and measures will be taken to ensure that adequate service levels are maintained.**	As discussed below, the project is consistent with all of the applicable Quality of Life Standards as well as their related General Plan policies. The project has been designed to meet minimum thresholds of service levels and would offset the potential increase in existing demand for facilities through payment of applicable fees. Therefore, the project is consistent with this goal.
Quality of Life Standard 1: Traffic and Transportation	Circulation Element streets and intersections shall be planned and developed to achieve a minimum level of service "C" defined by the Highway Capacity Manual as amended or updated, or such other national standard as deemed appropriate by the city. Level of service "C" may not be feasible in all areas at all times and level of service "D" shall be considered the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented "smart growth" and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city. Where existing street or intersection capacities are below level of service "C," street, operational or Transportation System Management improvements shall be required or planned to improve the service level to "C" whenever feasible based upon impacts of future development. Such requirements or plans may be incremental to accommodate future development or the recycling of existing development. Feasibility of level of service "C" shall be based on impacts upon existing development or environmental constraints along street segments or intersections. Capital improvement programs and/or facility plans shall include Transportation System Management (TSM) measures designed to maintain or improve levels of service at existing or developed intersections that may be impacted by further development or traffic volume growth. The city shall support public transportation facilities through such measures as requiring right-of-way for commuter rail or park-and-ride facilities, transit stops or facilities, or for other transportation needs. The city shall establish	As discussed in Section 3.15 (Transportation), a Local Mobility Analysis was prepared for the proposed project to assess transportation effects including the project's effects on roadway and intersection level of service (LOS) (LOS Engineering 2022). The analysis concluded that the project would have calculated traffic effects under existing, near term or long term conditions on the segment of North Iris Lane between Robin Hill Lane and City Centre Parkway. Implementation of project improvements and compliance with regulatory requirements, as detailed in Section 3.15.4, would improve the segment operations on North Iris Lane from Robin Hill Lane to Centre City Parkway from LOS E to LOS C. The project is consistent with this quality of life standard.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	TSM measures and shall cooperate with agencies and coordinate with regional transportation plans and transportation agencies. Adopted SANDAG models shall be utilized to determine Quality of Life compliance.	
Quality of Life Standard 2: Public Schools	The community shall have sufficient classroom space to meet state mandated space requirements and teacher/student ratios, with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.	Section 3.13 (Public Services) analyzed the potential for the project to impact local schools. As discussed, there would be adequate capacity in the schools to serve the students generated by the proposed project. The applicant would also pay school mitigation fees to assist the school district's long-range plans. The proposed project is consistent with the applicable goals and policies related to schools. The project is consistent with this quality of life standard.
Quality of Life Standard 3: Fire Service	In urbanized areas of the city, an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of ten (10) minutes for supporting companies shall be maintained. A minimum of seven (7) total fire stations each staffed with a PSU engine company shall be in place prior to General Plan build-out. For outlying areas beyond a five (5) minute travel time or further than three (3) miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief. Travel time is the elapsed time from a verbal or computerized acknowledgment of the dispatch by the responding unit at the moment of departure from the station to its arrival at the scene. Response time is the elapsed time from receiving a call for service to the responding unit's arrival at the scene. In the case of single family residences "arrival at the scene" shall mean at the front door of the residence; for multi-family residences "arrival at the scene" shall mean at the street access to the involved building. The Fire Department intends to meet these times for no less than 90 percent of all emergency responses by engine companies.	Section 3.13 (Public Services) analyzed the potential for the project to impact adequate fire protection and emergency medical services. Due to the project's proximity to Fire Station No. 3, as well as payment of public facility fees that go toward addressing the Escondido Fire Department's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities. As discussed below, the project is consistent with the applicable goals and policies related to fire protection. The project is consistent with this quality of life standard.
Quality of Life Standard 4: Police Service	The city shall maintain personnel staffing levels based on community generated workloads and officer availability. Resources will be adjusted to maintain an initial response time for Priority 1 calls (crimes in progress or life threatening) of no more than five (5) minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life threatening incidents) of no more than six and one-half (6½) minutes. The Escondido Police standard includes the measurement of elapsed times from when the call is initially	Section 3.13 (Public Services) analyzed the potential for the project to impact adequate police protection. Due to the project's proximity to Escondido Police and Fire Headquarters, as well as payment of public facility fees that go toward addressing the Escondido Police Department's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities. As discussed below, the project is consistent

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	processed by the communication operator, the transfer of call information to the police officer, and the time of the field officer's arrival at the service call location. Resources will be allocated to organize patrol areas and to involve community members when appropriate to achieve Community Oriented Problem Solving (COPS) efforts. To the maximum economic extent Escondido Union School District's L.R. Green Middle School (above) Officers at Escondido's Police and Fire Central Operations Facility grand opening ceremony Escondido General Plan Vision and Purpose Page I-15 feasible, the Police Department will take aggressive enforcement action against crime trends, including maintenance procedures and incorporating community involvement and education as a means to deter potential incidents.	with the applicable goals and policies related to police protection. The project is consistent with this quality of life standard.
Quality of Life Standard 5: Wastewater System	The city wastewater system shall have adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs. Capacity to treat a minimum of 250 gallons per day for each residence on said system or as established in the city's Wastewater Master Plan shall be provided.	As discussed in Section 3.16 (Utilities and Service Systems), a sewer analysis was prepared for the project and is included as Appendix M (Dexter Wilson 2021). The analysis concluded that the existing system has adequate capacity to serve the project and that with the addition of sewer flows from the project, all sections of the existing 10-inch diameter sewer line will flow less than half full during peak conditions and all sections of the 15-inch diameter sewer line will flow less than three quarters full during peak flow conditions. Therefore, impacts to wastewater infrastructure were determined to be less than significant. The project is consistent with this quality of life standard.
Quality of Life Standard 6: Parks System	The city shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units. Urban recreational amenities such as exercise courses, urban trails, tree lined shaded walkways and plazas, etc. shall be focused in high intensity downtown and urban areas. Priority shall be given to acquiring land to expand Grape Day Park north of Woodward Avenue and developing neighborhood parks in urban areas with the greatest need. School playground areas may be included as park acreage, provided that neighborhood park amenities and facilities are accessible, approval is granted by the school district(s) and the facility is open to the public as determined by the City Council. Prior to build-out, the city shall provide a minimum of two (2) community centers.	As discussed in Section 3.14 (Recreation) as of 2012, the city had 6,556 acres of parkland and open space and, as of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland per 1,000 units, representing an existing surplus of park and open space land. For the project to meet the requirement of 11.8 acres of parkland per 1,000 dwelling units, the addition of 98 residential units would require the provision of 1.16 acres of additional park and open space. The project includes 64,247 s.f. (1.48 acres) of common open space area with grades less than 10 percent including usable open space areas as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The proposed project also includes recreational areas totaling 11,359 s.f. (0.26 acre), including a tot lot, barbeque area, outdoor workout area, dispersed seating and patio areas throughout the site. These areas would be maintained by the Homeowners Association. Therefore, the project would provide a combined total of approximately 1.74 acres of active and passive public open space. The project would also provide a total of 21,434 s.f.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	Other specialized recreation facilities shall be incorporated into the city's Master Plan for Parks, Trails and Open Space.	(0.49 acre) of outdoor private space. Therefore, the proposed project would exceed the 1.16 acres of park/open space area General Plan requirement. The project is consistent with this quality of life standard.
Quality of Life Standard 7: Library Service	The public library system shall maintain a stock and staffing of two (2) collection items per capita and three (3) public library staff per 8,000 residents of the City of Escondido. The city shall provide appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the city prior to buildout of the General Plan where feasible. The city shall continue to expand the role of technology in providing library services and resources to Escondido residents.	Per the City's General Plan Update EIR, the City does not currently meet this quality of life standard. To meet the proposed quality of life standards identified within the General Plan Update, the Escondido Public Library would need to provide the following by 2035: 79 staff, 420,000 collection items, and 102,333 s.f. of facility space. As discussed in Section 3.,13 (Public Services) the increase in demand for library services from development of the proposed project would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects. Impacts to library facilities were determined to be less than significant. The project is consistent with this quality of life standard.
Quality of Life Standard 8: Open Space System	A system of open space corridors, easements, acquisition programs and trails shall be established in the Resource Conservation Element. Sensitive lands including permanent bodies of water, floodways, wetlands, riparian and woodland areas, and slopes over 35 percent inclination shall be preserved. Significant habitat for rare or endangered species shall be protected in coordination with state and/or federal agencies having jurisdiction over such areas.	As discussed in Section 3.3 (Biological Resources) the project site is currently developed with single family residences and is surrounded by residential development. The project site is not located in a biologically sensitive area, wildlife corridor, habitat linkage or an area identified as open space. The project is consistent with all applicable policies related to biological and open space resources. The project would fully mitigate all impacts to sensitive habitats and species. The project is consistent with this quality of life standard.
Quality of Life Standard 9: Air Quality	The city shall establish a Climate Action Plan with feasible and appropriate local policies and measures aimed at reducing regional greenhouse gas emissions. Measures shall include, but not limited to, reducing the number of vehicular miles traveled, supporting public transportation, participating in the development of park-and-ride facilities, coordinating land-use approvals, accommodating facilities for alternative fuel vehicles, maintaining and updating the city's traffic signal synchronization plan, promoting local agriculture, increasing landscaping standards, promoting landscaping programs, and encouraging non-polluting alternative energy systems.	The City of Escondido developed an update to the 2013 Climate Action Plan (CAP) (City of Escondido 2021). The CAP outlines strategies and measures that the city will undertake to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. A GHG study was prepared for the proposed project (Appendix H). As discussed in Section 3.7 (Greenhouse Gas), the project would be consistent with the City's GHG emissions thresholds and would have less than significant impacts related to the generation of GHG emissions during construction and operation. As described in Section 7.7.1 the project would implement 10 project design features aimed at reducing GHG emissions and two transportation demand strategies.
Quality of Life Standard 10: Water System	The city shall maintain provisions for an adequate water supply, pipeline capacity and storage capacity to meet normal and emergency situations and shall have the capacity to provide a minimum of 540 gallons per day per household or as established by the city's Water	The proposed project would be served by Rincon del Diablo Municipal Water District (RDDMWD) for water. Section 3.16 (Utilities and Service Systems) analyzed the project's potential for impacts related to water supply and infrastructure. Based

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	Master Plan. Federal and state drinking water quality standards shall be maintained. The city shall continue efforts to implement water reclamation and water conservation programs.	upon the analysis there is adequate water supply and infrastructure to serve the project. The project is consistent with this quality of life standard.
Chapter II. Land Use and Community Form		
Goal 1: Community Character	**A community composed of distinct residential neighborhoods, business districts, and employment centers, whose urban form reflects the natural environmental setting.**	The proposed project would develop residential uses within an areas already dominated by residential uses. It would add to the variety of housing stock in the area and City. The project has been designed to complement the project site and surroundings and will incorporate varied architectural styles to create visual interest. The project includes community amenities including sidewalks along the project frontage with North Iris Lane and Robin Hill Lane, high quality landscaping including street trees, and a sitting area with historical information at the northeast corner of the project site. The project has been designed to minimize impacts to offsite mature and protected trees. The project is consistent with this goal.
Community Character Policy 1.1	New development should serve to reinforce the city's present development pattern of higher-intensity development within the downtown area and lower-intensity development in outlying areas. As a guide toward accomplishing this objective, new development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses. This policy shall limit density transfers from constrained portions of a property as defined in the land use and open space goals. (Amendment to this policy will continue to require voter approval)	The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24/du acre. In the City's General Plan, this site is identified as Suburban which allows for up to 3.3. du/acre. The project's proposed density would be 13.2 du/acre which provides a density that falls between the senior multi-family housing to the east and the single family residential to the west, north and south. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Community Character Policy 1.2	The boundaries of the Land Use categories depicted on the General Plan are not precise. However, the categories are generally intended to avoid intensification of existing land use or zoning designations where land use compatibility and the objectives of the General Plan are at issue. (Amendment to this policy will continue to require voter approval)	The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24/du acre. In the City's General Plan, this site is identified as Suburban which allows for up to 3.3. du/acre. The project's proposed density would be 13.2 du/acre which provides a density that falls between the senior multi-family housing to the east and the single family residential to the west, north and south. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Community Character Policy 1.3	Focus development into areas where land use changes achieve the community's long term goals. Facilitate development that is consistent with the build out vision for each area through incentive	The project site is located in an area presently designated for urban development as Village Residential VR-24 in the County's General Plan. A change from a planned

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	programs and efficient administrative and discretionary approval processes for plot plans, Planned Developments, Area Plans, Specific Plans, and Zoning Overlays.	more intensive use to a less intensive use would be consistent with the buildout vision for the area. Therefore, the proposed project is consistent with this policy.
Community Character Policy 1.5	The city should maintain its single-family residential development pattern, except in locations such as the downtown, along major transportation corridors, and around commercial and public activity centers, where higher densities are more appropriate. (Amendment to this policy will continue to require voter approval)	The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24/du acre. In the City's General Plan, this site is identified as Suburban which allows for up to 3.3. du/acre. The project's proposed density would be 13.2 du/acre which provides a density that falls between the senior multi-family housing to the east and the single family residential to the west, north and south. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Community Character Policy 1.6	Residential Categories are established for purposes of providing the city with a range of building intensities to address various site constraints and opportunities. Proposed development shall not exceed the densities shown on the Land Use Plan and outlined in Figure II-6. (Amendment to this policy will continue to require voter approval).	The proposed project would not intensify the existing land use designation on the project site. The amendment would change the Land Use Element Map to designate the proposed project site Urban III (U3). The existing designation on the project site is Village Residential VR-24. Development under the U3 designation would not be as intense as under the VR-24 designation. The proposed project would be developed in accordance with the Medium Density Residential (R-3) development standards, as modified by site specific Planned Development Residential (PD-R) standards. Therefore, the proposed project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Community Character Policy 1.7	Incorporate iconic signage, artwork, landscaping and/or architecture characterized as uniquely Escondido at gateway locations to define a sense of entry and strengthen community identity.	The project site is not a City designated gateway location. Therefore, this City General Plan policies is not applicable.
Community Character Policy 1.8	Require development projects to locate and design buildings, construct energy and water efficient infrastructure, reduce greenhouse gas emissions, enhance community livability and economic vitality, and implement other practices contributing to sustainable resources.	Project structures would be located and designed, to be energy and water efficient, reduce GHG emissions, enhance community livability and economic vitality, and implement other practices contributing to sustainable resources. The proposed project would meet or exceed all applicable energy and GHG standards of the City. Therefore, the proposed project is consistent with this policy.
Community Character Policy 1.10	Reduce light pollution and preserve views of the night sky through the design and sighting of light fixtures to minimize light spill-over onto adjacent properties.	The proposed project will reduce light pollution and preserve views of the night sky through the design and sighting of light fixtures to minimize light spill-over onto adjacent properties. Therefore, the proposed project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Community Character Policy 1.11	Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).	The project site plan, floor plans, elevations, and landscape plan establish that the overall design of the proposed project would achieve an attractive, efficient and stable environment. The proposed project would be designed in a manner consistent and compatible with the surrounding residential development. The project would have a Traditional Farmhouse architectural style. Proposed materials would not be glare inducing and include wood, stucco, siding with decorative trims. The project is consistent with this policy.
Community Character Policy 1.12	No development shall be permitted on slopes greater than 35% or in natural 100-year floodways. If approved by the city and other appropriate local, state and federal agencies, an environmental channel may be considered within the floodway. Adequate landscaping, revegetation, flood control measures and usable open space beyond the embankments of the environmental channel shall be provided as determined by the city. (Amendment to this policy will continue to require voter approval)	The project site is generally flat and there are no slopes greater than 35% on the site. There are no natural 100-year floodways on the project site. Therefore, the proposed project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Community Character Policy 1.14	Recognize Community Plans approved by the Board of Supervisors within Escondido's General Planning Area and coordinate land use and design guidelines to minimize impacts in areas where city/county lands transition. Collaborate with annexing property owners to retain desired components of their Community Plans by considering appropriate zoning overlay designations in the event of annexation.	The proposed project would not be located in a Community Plan area. The project would be annexed into the City of Escondido.
Community Character Policy 1.15	Notify and coordinate with surrounding property owners and resident groups when conducting land use studies affecting residents of unincorporated communities to include property owners, resident groups, homeowner's associations, and / or planning advisory groups that make their presence known to the city. Utilize neighborhood meetings to notify interested parties to gather information and solicit input for recommendation to various decision-makers.	Review of the proposed project by the City will include notification and coordinate with all appropriate Agencies to include appropriate Federal, state, regional, and local jurisdictions. City required proposed project notices will be provided to all surrounding property owners, resident groups, residents of the adjacent unincorporated community, homeowner's associations, and/or planning advisory groups. Additionally, out-reach meeting(s), Planning Commission, and City Council public hearings will be accomplished to gather information and solicit input. Therefore, the proposed project is consistent with this policy.
Community Character Policy 1.16	Support the formation of Homeowners" Associations to maintain private streets, common open space areas, and landscaping within and adjacent to such developments, and facilitate annexation into the city's Landscape Maintenance District (or an acceptable alternative) for maintenance of similar landscaping improvements where no Homeowners" Association is established.	The proposed project would include formation of a homeowners associations (HOA) to maintain private streets, common open space areas, and landscaping. Therefore, the proposed project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Goal 2: Land Use Zoning	**Regulations that clearly and effectively implement land use development goals and objectives.**	The proposed project would be generally consistent with the goals and policies of the City General Plan related to clearly and effectively implementing land use development goals and objectives. The proposed project would not hinder or be contrary to the General Plan Goals and Policies related to land use zoning in that the proposed project would not impact any update or revision to City ordinances. The proposed project would not impact the City's ability to apply zoning overlays or impact City programs related to land use planning. The proposed project would not impact the City's ability to establish new zoning categories. The proposed project would not impact any zoning in the City other than that of the project site as described above. The proposed project is not located on constrained land as defined in the City's General Plan.
Goal 3: Residential Development	**Neighborhoods that provide a variety of housing types, densities, and design, and a mix of uses and services that support resident needs.**	The proposed project would develop residential uses within an areas already dominated by residential uses. It would add to the variety of housing stock in the area and City. The project has been designed to complement the project site and surroundings and will incorporate varied architectural styles to create visual interest. The project includes community amenities including sidewalks along the project frontage with North Iris Lane and Robin Hill Lane, high quality landscaping including street trees, and a sitting area with historical information at the northeast corner of the project site. The project will contribute fair share payments for roadway improvements in the project vicinity and pedestrian improvements at five intersections. The project is consistent with this goal.
Residential Development Policy 3.1	Residential Density is defined as the maximum number of dwelling units permitted per acre, including streets within the development, excluding all ultimate circulation element street rights-of-way, adjustments for floodways as defined by the Federal Emergency Management Agency (FEMA—see Flooding Map) or the City, slope categories, and other environmental factors as designated in each land use category and/or open space/ conservation element. Building intensity is based upon the number of dwellings per acre permissible in each category subject to constraints and opportunities provided by all General Plan policies. Limited nonresidential development, such as churches or schools, may occur in residential categories subject to state and local ordinances. (Amendment to this policy will continue to require voter approval)	The Property currently has a County General Plan designation of Village Residential VR-24 (up to 24 du/acre). The project is requesting a City of Escondido General Plan Amendment to change the project site's land use from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre). The project is also requesting a Prezone/Rezone to Planned Development – Residential with a density of 13.2 units/acre. There is no existing City of Escondido Zoning on the project site. The proposed project is not seeking the maximum development yield for the Urban 3 designation. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Residential Development Policy 3.3	The residential land use designation indicates MAXIMUM development yields. To meet General Plan Goals and Objectives, including, but not limited to, population goals and environmental considerations, the ACTUAL yield may be considerably less than maximum potentials. Population density can be determined by the San Diego Association of Governments (SANDAG) projection of an average number of residents per dwelling unit by the build-out target year of 2035 and the maximum units per acre allowed by each land use designation. In lower density categories, the number of residents per unit will often exceed three due to relatively large structures. Conversely, in multi-family areas, smaller unit sizes will result in 1-2 per-sons per unit being commonplace. Further, population and building intensities are estimated in the General Plan Vision and Purpose. (Amendment to this policy will continue to require voter approval)	The Property currently has a County General Plan designation of Village Residential VR-24 (up to 24 du/acre). The project is requesting a City of Escondido General Plan Amendment to change the project site's land use from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre). The project is also requesting a Prezone/Rezone to Planned Development – Residential with a density of 13.2 units/acre. There is no existing City of Escondido Zoning on the project site. The proposed project is not seeking the maximum development yield for the Urban 3 designation. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Residential Development Policy 3.4	Require that properties in Urban III, IV, and V residential designations be developed at a minimum 70% of their permitted densities in order to promote transit ridership and walking, support nearby commercial establishments and take advantage of infrastructure improvements sized to accommodate their intended intensities.	The Property currently has a County General Plan designation of Village Residential VR-24 (up to 24 du/acre). The project is requesting a City of Escondido General Plan Amendment to change the project site's land use from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre). The project is also requesting a Prezone/Rezone to Planned Development – Residential with a density of 13.2 units/acre. There is no existing City of Escondido Zoning on the project site. This meets the minimum 70% density requirement identified in this policy. Therefore, the proposed project is consistent with this policy.
Residential Development Policy 3.8	Land use designations and zoning classifications may accommodate maximum yields for one residential development proposal which may not be achievable due to conflict with the overall population objectives. In review of residential development proposals, population objectives may be considered to preserve the welfare of the community. (Amendment to this policy will continue to require voter approval)	The Property currently has a County General Plan designation of Village Residential VR-24 (up to 24 du/acre). The project is requesting a City of Escondido General Plan Amendment to change the project site's land use from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre). The project is also requesting a Prezone/Rezone to Planned Development – Residential with a density of 13.2 units/acre. There is no existing City of Escondido Zoning on the project site. The proposed project is not seeking the maximum development yield for the Urban 3 designation. The project is consistent with this policy. The project does not propose an amendment to this policy and voter approval would not be required.
Goal 4: Neighborhood Maintenance & Preservation	**Residential neighborhoods that are well- maintained and enduring, and continue to be great places to live for multiple generations.**	The proposed project will create a high-quality residential development with a thoughtful layout and architectural design, private and common open space areas, and implement a landscape concept plan. The project offers a mix of home size and

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		layouts to accommodate a variety of homeowners. The project is consistent with this goal.
Maintenance & Preservation Policy 4.3	Integrate pedestrian-friendly features, promote walkability, and work with residents to enhance existing neighborhood character and aesthetics.	The project incorporates pedestrian friendly features. The project will construction sidewalks along the project frontage on North Iris Lane and Robin Hill Lane. The project will also pay for pedestrian improvements at five intersections in the City as part of the VMT mitigation requirements. These improvements will promote walkability. Therefore, the proposed project is consistent with this policy.
Goal 16: Annexation	**Annexation of properties for the provision of municipal services whose development shall complement and be compatible with adjoining areas without placing an undue financial burden on the city.**	The project applicant is requesting approval of annexation into the City. The project is compatible with the adjacent residential uses. The project would pay all applicable developer fees and will also make fair share contributions towards roadway improvements. The project will also fund pedestrian safety improvements at five intersections. Based upon the analysis in Section 3.13 (Public Services) and 3.16 (Utilities and Service Systems), there are adequate services available to serve the project. The project is consistent with this goal.
Annexation Policy 16.1	Allow property owners to annex to the city, and actively annex unincorporated lands owned by the city.	The project applicant is requesting approval of annexation into the City. LAFCO approval will be required for the annexation. The project is consistent with this policy.
Annexation Policy 16.2	Promote the annexation of unincorporated lands where it is determined in the city's interest to promote orderly development, implement goals and objectives, and /or to expedite facilities and services.	The project applicant is requesting approval of annexation of part of a county island into the City. The project would promote orderly development and the project would be consistent with residential uses in the project vicinity. The project is consistent with this policy.
Annexation Policy 16.3	Demonstrate that facilities, services, and infrastructure are adequate to serve proposed annexations in accordance with city standards, acknowledging Neighborhood Maintenance & Preservation Policy 4.4 allowing more flexible public improvement requirements in the Rural and Estate I single-family residential areas.	The project applicant is requesting approval of annexation into the City. The project is compatible with the adjacent residential uses. The project would pay all applicable developer fees and will also make fair share contributions towards roadway improvements. The project will also fund pedestrian safety improvements at five intersections. Based upon the analysis in Section 3.13 (Public Services) and 3.16 (Utilities and Service Systems), there are adequate services available to serve the project. The project is consistent with this policy.
Annexation Policy 16.4	Allow annexations if it can be demonstrated that appropriate improvements as determined by the city will be financed by the property owner(s), and that such expansion of the city will not have unacceptable adverse fiscal or environmental impacts to existing city	The project applicant is requesting approval of annexation into the City. The project is compatible with the adjacent residential uses. The project would pay all applicable developer fees and will also make fair share contributions towards roadway improvements. The project will also fund pedestrian safety improvements at five intersections. Based upon the analysis in Section 3.13 (Public Services) and

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	services or residents. Exceptions to this policy may be considered subject to Policy 16.2.	3.16 (Utilities and Service Systems), there are adequate services available to serve the project. The project is consistent with this policy.
General Plan Review and Amendments Policy 17.8	Require California Environmental Quality Act (CEQA) review for development that exceeds the 2035 forecasted General Plan development capacity as defined in Figure II-5.	This EIR provides the CEQA review for the project. The project is consistent with this policy.
Goal 18: Environmental Review	**Environmental quality regulations that mitigate for impacts associated with development to preserve and protect Escondido's unique environment.**	The proposed project would be generally consistent with the goals and policies of the City General Plan related to environmental review. The proposed project would not hinder or be contrary to the General Plan Goals and Policies related to environmental quality regulations that mitigate for impacts associated with development to preserve and protect Escondido's unique environment. This EIR will be prepared and evaluated in accordance with CEQA and City policies adopted to implement CEQA. Therefore, the proposed project is consistent with this goal.
Environmental Review Policy 18.2	Require environmental review and mitigation of impacts, if necessary, consistent with city, state, and federal requirements for development projects the Planning Area.	This EIR includes analysis of environmental impacts and identifies mitigation where applicable. The project is consistent with this policy.
Environmental Review Policy 18.4	Require all development to conform to the General Plan, Facilities Plans, Areas Plans, and Quality of Life Standards.	This EIR, specifically this table, addresses the project's consistency with the General Plan policies including facilities plans and quality of life standards. The project is consistent with this policy.
Chapter III Mobility and Infrastructure Element		
Goal 1: Regional Transportation Policy	**An accessible, safe, convenient, and integrated multimodal network that connects all users and moves goods and people within the community and region efficiently.**	A Local Mobility Analysis was prepared for the proposed project to assess transportation effects and ensure orderly development, public safety, adequate infrastructure, and consistency with the General Plan. The reports are included in Appendix K and summarized in Section 3.15 (Transportation). As discussed in Section 3.15 (Transportation), the project would result in less than significant impacts related to pedestrian, bicycle and transit facilities; roadway operations; traffic hazards; and emergency access. As discussed below, the project is consistent with all applicable policies related to transportation. The project is consistent with this goal.
Complete Streets Policy 2.1	Ensure that the existing and future transportation system is interconnected and serves multiple modes of travel, such as walking, biking, transit, and driving for safe and convenient travel.	As discussed in Section 3.15 (Transportation) the project would not result in any impact to existing built out pedestrian, bicycle or transit facilities in the project vicinity. The applicant will be completing half street improvements along the project frontage on North Iris Lane and on Robin Hill Lane that will improve pedestrian

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		network connectivity for the neighborhood. Additionally, as part of the project, the applicant will install Class III bike marking along the project's frontage on North Iris Lane. The closest bus stops are 0.25 mile (approximately 1,500 feet away) from the project site and would not be impacted by the project. The project results in traffic effects under Existing, Near Term or Long Term Year 2035 conditions on the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway (LOS E). Implementation of project design features and regulatory compliance measures, as detailed at the beginning of Section 3.15.4 will improve operations of this segment to LOS C. The project is consistent with this policy.
Complete Streets Policy 2.4	Evaluate access, safety, and convenience of various transportation modes for the following eight user groups for every project: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.	As discussed in Section 3.15 (Transportation) and in the discussion for Complete Streets Policy 2.1, the project would not result in any impact to existing built out pedestrian, bicycle or transit facilities. The project will improve pedestrian network connectivity for the neighborhood and install Class III bike markings along its frontage. The project results in traffic effects under Existing, Near Term or Long Term Year 2035 conditions on the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway (LOS E). Implementation of project design features and regulatory compliance measures, as detailed at the beginning of Section 3.15.4 will improve operations of this segment to LOS C. The project is consistent with this policy.
Pedestrian Network Policy 3.3	Maintain a pedestrian environment that is accessible to all and that is safe, attractive, and encourages walking.	As discussed in Section 2.0 (Project Description) the project provides an accessible path of travel through the site and to each residence via pedestrian pathways. Also, the project would make pedestrian improvements on North Iris Lane and Robin Hill Lane. The applicant would install approximately 850 feet of sidewalk along the project frontage with North Iris Lane. This would complete a missing section of sidewalk along North Iris Lane and improve pedestrian network connectivity for the neighborhood. Robin Hill Lane is currently a private roadway that is 20-feet wide with no sidewalk. Under the proposed project, the project would provide a 24-foot easement for a private driveway to provide for two 16-foot travel lanes and a 4-foot sidewalk on Robin Hill Lane. The project would install approximately 440 feet of sidewalk on Robin Hill Lane. Additionally, the project's landscape plan includes street trees along the project frontages with North Iris Lane and Robin Hill Lane. The project is consistent with this policy.
Pedestrian Network Policy 3.5	Promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; orienting development toward the street;	See discussion for Pedestrian Network Policy 3.3. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	employing traffic calming measures; and enforcing vehicle speeds on both residential and arterial streets.	
Pedestrian Network Policy 3.10	Design and construct pedestrian-friendly streetscape improvements that reduce stormwater and pollutant runoff into the drainage system, using such techniques as urban bio-swales for the filtering of pollutants and permeable hardscapes.	The project will construct a sidewalk along the project frontage on North Iris Lane and Robin Hill Lane. The project incorporates landscaping to enhance the pedestrian experience including street trees. The project is consistent with this policy.
Bicycle Network Policy 4.3	Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.	As discussed in Section 3.15 (Transportation), the project would not result in any impact to existing bicycle facilities in the project vicinity. Additionally, as part of the project, the applicant will install Class III bike marking along the project's frontage on North Iris Lane. The project is consistent with this policy.
Transit System Policy 5.8	Require that new developments incorporate transit-supporting facilities into the project design, where appropriate.	The closest bus stops to the project site are 0.25 mile (approximately 1,500 feet away) from the project site and would not be impacted by the project. As shown in Table 2-2 Project Design Features, to encourage transit use, the Homeowners Association shall provide information about maps, routes, and schedules for public transit. They will also provide information about SANDAG's iCommute program to encourage carpooling.
Street Network Policy 7.3	Strive to maintain LOS C or better throughout the city except for within the urban core. Establish LOS D as the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented „smart growth" and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city.	As discussed in Section 3.15 (Transportation), a Local Mobility Analysis was prepared for the proposed project to assess transportation effects including the project's effects on roadway and intersection level of service (LOS). The project results in traffic effects under Existing, Near Term or Long Term Year 2035 conditions on the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway (LOS E). Implementation of project design features and regulatory compliance measures, as detailed at the beginning of Section 3.15.4 will improve operations of this segment to LOS C. The project is consistent with this policy.
Street Network Policy 7.7	Require new development projects to analyze local traffic impacts, and construct and implement the improvements required for that development.	See discussion for Pedestrian Network Policy 7.3. The project is consistent with this policy.
Street Network Policy 7.8	Require new development projects to analyze traffic impacts on the regional transportation system and pay a fair-share contribution to regional transportation improvements.	See discussion for Pedestrian Network Policy 7.3. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Street Network Policy 7.11	Enhance the safety and efficiency of accessing the public street network from private properties by: a) Controlling driveway access locations on Prime Arterials and Major Roads; b) Installing medians and access controls on Collector Roads and higher classifications; c) Maintaining minimum distances from intersections for accessing Prime Arterials, Major Roads, and Collector streets; d) Consolidating driveway access; and, e) Encouraging interconnected parking lots	Section 3.15 (Transportation) assessed the potential for project impacts related to hazardous design features or incompatible uses and access and concluded impacts would be less than significant. Access to the project site would be via one 36-foot wide driveway on Robin Hill Lane which would provide a private gated circular bulb turnaround entry with access to ingress and egress. A 24-foot wide gated secondary exit-only driveway would be provided at the eastern boundary of the project site to connect with North Iris Lane. The project doesn't include any hazardous design features or incompatible uses and would be designed to provide safe movement throughout and around the project site. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to inadequate emergency access were identified. The project is consistent with this policy.
Parking Policy 8.1	Ensure off-street and on-street parking is adequate, considering access to transit facilities and mix of uses in the surrounding area.	The project proposes a total of 231 parking spaces. This includes 204 garage spaces associated with the units, which would be pre-wired for electric vehicle (EV) charging stations. An additional 27 guest spaces are included in the project design and include 22 open guest spaces, 2 Americans with Disability Act (ADA) guest spaces and 3 EV spaces. The project is consistent with this policy.
Parking Policy 8.3	Encourage parking in shared surface lots or parking structures to make the most efficient use of land.	The project includes an additional 26 guest spaces beyond the 204 garage spaces associated with the multi-family residential units. The project is consistent with this policy.
Traffic Calming Policy 9.2	Encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) that add character and create opportunity for improved aesthetics while effectively managing traffic.	Access to the project site includes a private gated circular bulb turnaround entry with access to ingress and egress. The project is consistent with this policy.
Traffic Calming Policy 9.3	Protect residential neighborhoods from cut-through traffic and other traffic-related issues by implementing appropriate traffic calming measures.	The project site is located in a residential neighborhood and would not be affected by cut-through traffic. The project is consistent with this policy.
Water System Goal 2:	**Adequate and sustainable infrastructure and water supply to serve a community that values and conserves water.**	Section 3.16 (Utilities and Service Systems) analyzed the project's potential impacts to existing infrastructure and water supply and concluded that the project would have less than significant impacts. As discussed below, the project is consistent with all of the policies related to this goal. Therefore, the project is consistent with this goal.
Water System Policy 12.5	Require new development to provide adequate water facilities and/or finance the costs of improvements necessary to serve the demands	Based upon the analysis presented in Section 3.16 (Utilities and Service Systems, the project can be adequately served by existing Rincon Del Diablo Municipal Water

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	created by the development and/or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone water system improvements in master planned development projects involving multiple phases and developers.	District (RDDMWD) infrastructure and water supplies. The project's water demand can be met by existing water entitlements and the existing water infrastructure is adequate to serve the project. The project is consistent with this policy.
Water System Policy 12.7	Require any new water facilities to be constructed to city standards.	RDDMWD would provide water service to the proposed development on the project site. The project will abandon the existing 12-inch water line on Robin Hill Lane and install a new 12-inch main line looping system with a secondary tie on Robin Hill Lane.
Water System Policy 12.10	Implement federal and state drinking water quality standards for public water infrastructure facilities and private development projects.	The project would connect to existing RDDMWD infrastructure, as well as follow all applicable building code requirements for plumbing fixtures in the proposed residential units. Therefore, the project would not interfere with implementation of drinking water quality standards. The project is consistent with this policy.
Water System Policy 12.11	Continue to implement water conservation programs, such as requirements for water efficient landscaping and enforcement of water wise regulations, and amend as appropriate to reflect evolving technologies and best practices.	As discussed in Section 2.0 (Project Description), the planting palette focuses on low water use plants and the irrigation system would be designed in compliance with the City's Water Efficient Landscape Ordinance (WELO). The project is consistent with this policy.
Water System Policy 12.12	Require new development to incorporate water conservation techniques into building and site design incorporating such elements as water efficient fixtures (e.g., low flow shower heads); drought tolerant landscape, permeable hardscapes, and on-site stormwater capture and re-use facilities.	As discussed in Section 2.0 (Project Description), the planting palette focuses on low water use plants and the irrigation system would be designed in compliance with the City's Water Efficient Landscape Ordinance (WELO). The project would also adhere to the CALGreen 2019 building standards which establish minimum mandatory and voluntary standards pertaining to the planning and design of sustainable site development and water conservation. The project is consistent with this policy.
Goal 3: Wastewater System	**Provision of adequate and sustainable wastewater infrastructure to serve residents, businesses and property.**	A sewer analysis was prepared for the project (Appendix M) and is summarized in Section 3.16 (Utilities and Service Systems). The project proposes annexation into the City's sewer system and abandonment and removal of the existing septic systems. The analysis concluded that the existing sewer system has adequate capacity to serve the project. As discussed below, the project is consistent with all of the policies related to this goal. Therefore, the project is consistent with this goal.
Wastewater System Policy 13.3	Design the wastewater system to support development of properties at the intensities specified by the General Plan Land Use Plan.	A sewer analysis was prepared for the project (Appendix M) and is summarized in Section 3.16 (Utilities and Service Systems). The existing septic systems would be abandoned and removed and new sewer lines would be designed to meet all requirements of the City's Design Standards and to the satisfaction of the Director

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		of Utilities. A hydraulic analysis was conducted to determine if the project would impact the existing sewer system (Dexter Wilson 2021). The analysis concluded that the existing system has adequate capacity to serve the project and that with the addition of sewer flows from the project, all sections of the existing 10-inch diameter sewer line will flow less than half full during peak conditions and all sections of the 15-inch diameter sewer line will flow less than three quarters full during peak flow conditions. Therefore, impacts to wastewater infrastructure would be less than significant. The project is consistent with this policy.
Wastewater System Policy 13.5	Require new development to provide adequate wastewater facilities and finance the costs of improvements necessary to serve the additional demands created by the development and /or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone wastewater system improvements in master planned development projects involving multiple phases and developers.	The existing septic systems would be abandoned and removed and new sewer lines would be designed to meet all requirements of the City's Design Standards and to the satisfaction of the Director of Utilities. The sewer analysis concluded that the existing sewer system has adequate capacity to serve the project. The project is consistent with this policy.
Wastewater System Policy 13.7	Require any new wastewater system facilities be constructed to city standards.	As discussed in Section 3.16 (Utilities and Service Systems), the existing septic systems would be abandoned and removed and new sewer lines would be designed to meet all requirements of the City's Design Standards and to the satisfaction of the Director of Utilities. A hydraulic analysis was conducted to determine if the project would impact the existing sewer system and concluded that the existing system has adequate capacity to serve the project. The project is consistent with this policy.
Wastewater System Policy 13.9	Collect a "per-unit" wastewater connection fee for all new housing units required to be serviced by the City's wastewater system.	The project applicant will pay all applicable fees related to wastewater connections. The project is consistent with this policy.
Goal 4: Storm Drainage	**Provision of adequate and sustainable infrastructure that is environmentally sensitive to serve residents, businesses, and property.**	A Preliminary Drainage Study and Priority Development Project Stormwater Quality Management Plan (SWQMP) were prepared for the proposed project and are included as Appendix J1 and J2. As discussed in Section 3.9 (Hydrology and Water Quality), less than significant impacts were identified for hydrology and water quality. The project includes a comprehensive water quality management approach that includes the use of biofiltration with partial retention, source control best management practices (BMPs), and site design BMPs. The stormwater management design for the project was developed to be consistent with the Priority Development Project (PDP) requirements of the City of Escondido Storm Water Design Manual (BMP Design Manual).

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Storm Drainage Policy 14.2	Improve the existing storm drainage system by correcting identified deficiencies.	As discussed in Section 3.9 (Hydrology and Water Quality), the project proposes to use combination facilities to provide treatment of site runoff, hydromodification mitigation and peak flow attenuation. Site drainage will consist of paved private streets with curbs and surface gutters, and private storm drains that direct site runoff to three stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. These basins would serve as both retention and biofiltration features and be maintained by the Homeowners Association. The project grading will elevate the southerly portion of the site which will interrupt an existing off-site low flow channel. A bypass storm drain system will intercept and direct these off-site flows around the site, avoiding the need to enlarge the post-development treatment and hydromodification systems. A concrete drainage ditch will be constructed along the westerly boundary to intercept local flows and direct them to the bypass inlet. The bypass storm drain begins at the western boundary leading to the existing box culvert undercrossing to the south side of the North Iris Lane. In addition to intercepting the upstream flows, site discharge and runoff from the project frontage and the neighborhood to the south (Cheyenne Lane) will be captured. The project is consistent with this policy.
Storm Drainage Policy 14.3	Levy Drainage Fees for subdivided and developed land to finance drainage improvements. Periodically review and adjust for inflation, construction costs, and changes in land development intensities and timing.	The project applicant will pay the Public Facility Development Fees, that are in effect at the time of building permit issuance pursuant to Municipal Code Chapter 6, Article 18B. This fee is for the purpose of ensuring that the City's established public/drainage facility standards are met with respect to the additional needs created by such development. The project is consistent with this policy.
Storm Drainage Policy 14.5	Require new development to prepare drainage studies and improvement plans that demonstrate no net increase in stormwater runoff and compliance with adopted stormwater plans.	A Preliminary Drainage Study and SWQMP were prepared for the proposed project and are included as Appendix J1 and J2. As discussed in Section 3.9 (Hydrology and Water Quality), even with an increase in impervious surfaces, the site has been carefully designed to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. Post-development flows would be the same as in the pre-development condition due to the implementation of a comprehensive drainage plan, including the use of biofiltration facilities and BMPs. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff. The project is consistent with this policy.
Storm Drainage Policy 14.6	Require new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion, while encouraging implementation of low impact development measures and the maximum use of natural drainage	As discussed in Section 3.9 (Hydrology and Water Quality), the project would be required to prepare a Stormwater Pollution and Prevention Plan (SWPPP) and implement BMPs, including erosion and sediment control and non-stormwater management measures, to reduce construction effects on receiving water quality. With implementation of SWQMP and SWPPP BMPs, construction activities would not alter existing drainage patterns of the site in a way that would result in

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	ways, consistent with sound engineering and best management practices.	substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner that could result in flooding; create or contribute to runoff water in exceedance of planned drainage system capacity; or impede or redirect flows. Less than significant impacts were identified for drainage and water quality. The project is consistent with this policy.
Storm Drainage Policy 14.7	Require new development and redevelopment to minimize storm water runoff and contaminants entering drainage facilities by incorporating low impact development measures and other on-site design features such as bio-swales, retention ponds, and cisterns for storage and infiltration, treatment of flows, and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).	As discussed in Section 3.9 (Hydrology and Water Quality), the proposed project would comply with all applicable water quality standards and waste discharge requirements. The project includes a comprehensive water quality management approach that includes the use of biofiltration with partial retention, source control BMPs, and site design BMPs to ensure that there would not be an increase in pollutant discharge to receiving waters. No flow-thru treatment BMPs are proposed to be implemented on site in lieu of retention or biofiltration. The stormwater management design for the project was developed to be consistent with the PDP requirements of the City of Escondido Storm Water Design Manual. The Stormwater Design Manual provides the guidance necessary to comply with the City of Escondido Municipal Code (Chapter 22, Article 2) and regional MS4 Permit. A SWPPP would also be developed and implemented. Preparation and implementation of the SWPPP and BMPs, including erosion and sediment control and non-stormwater management measures, to reduce construction effects on receiving water quality would ensure compliance with the provisions of the NPDES General Permit. The project is consistent with this policy.
Storm Drainage Policy 14.8	Mitigate negative impacts to adjacent surrounding land uses from pertinent drainageway corridors by incorporating appropriate structural and non-structural best management practices (BMPs). BMP"s may include the use of screening, landscaping, or open space setbacks.	As discussed in Section 3.9 (Hydrology and Water Quality), in addition to the biofiltration and retention features, which are considered structural BMPs, the proposed project would also incorporate source control and site design BMPs as identified in the preliminary SWQMP for the proposed project. These BMPs have been designed in a manner to be consistent with the requirements of the City's Water Design Manual which requires that no pollutants are discharged to the MS4s. Per the Water Design Manual (Page 1-5) all development projects, or phases of development projects, are required to implement temporary erosion, sediment, good housekeeping and pollution prevention BMPs to mitigate storm water pollutants during the construction phase. The project is consistent with this policy.
Storm Drainage Policy 14.10	Promote the joint use of stormwater drainage facilities for recreation and conservation purposes, such as integrating sports fields in detention basins, or trails along drainage courses.	As discussed in Section 2.0 (Project Description), three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The water quality basins would be used to direct water during rain events to control for flooding and to treat water before it is discharged from the

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		site. These areas total 64,247 s.f. and would be maintained by the Homeowners Association. The project is consistent with this policy.
Storm Drainage Policy 14.12	Design stormwater facilities to minimize the need for frequent maintenance.	The stormwater management design for the project was developed to be consistent with the PDP requirements of the City of Escondido Storm Water Design Manual, including Section 7.5 Inspection and Maintenance Frequency and 7.6 Measures to Control Maintenance Cost. Per the BMP Design Manual, the most effective way to reduce maintenance of structural BMPs is to prevent or reduce pollutants generated onsite and delivered to the structural BMP by implementation of source control and site design BMPs onsite. These BMPs are included in the project's stormwater management plan. The project is consistent with this policy.
Storm Drainage Policy 14.13	Design and maintain detention facilities that are environmentally sustainable and compatible with surrounding uses to maximize vector control, manage flows, and maximize opportunities for conservation of water.	As discussed in Section 2.0 (Project Description), three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The water quality basins would be used to direct water during rain events to control for flooding and to treat water before it is discharged from the site. These areas would be maintained by the Homeowners Association. The project is consistent with this policy.
Goal 5: Solid Waste and Recycling	**Reduction in the generation and disposal of solid waste.**	Section 3.9 (Hydrology and Water Quality) analyzed the project's potential for impacts related to generation and disposal of solid waste. The analysis concluded that the proposed project's solid waste generation can be accommodated at the Sycamore landfill. The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The project is consistent with this goal.
Solid Waste and Recycling Policy 15.8	Encourage and promote the use of recycled materials in residential and non-residential applications, including construction and building materials, office supplies, and equipment. Continue the city's purchase of recycled materials and supplies outlined in the Recycled Products Purchasing Policy.	The project would be required to comply with all regulations and programs related to recycling in residential developments at the time of building permit issuance. The project is consistent with this policy.
Goal 6: Energy	**An increased use of renewable energy sources, and improved energy conservation and efficiency.**	Section 3.5 (Energy) addressed the project's contribution toward the City's goal of increasing the use of renewable energy sources and improved energy conservation and efficiency. With adherence to existing regulations and incorporation of design measures, no significant impacts were identified related to the project's use of energy. As discussed, below, the project is consistent with all applicable policies related to energy. The project is consistent with this goal.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Energy Policy 16.2	Continue to work with local utility providers to ensure that adequate electricity and natural gas services and facilities are available for new and existing development.	Electricity and natural gas service is currently provided to the project site by San Diego Gas & Electric (SDG&E). SDG&E would continue to serve the proposed development for electric service (and natural gas if needed). The project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project applicant would coordinate with SDG&E regarding undergrounding of existing lines. See Energy Policy 16.13 for more details, below. The project is consistent with this policy.
Energy Policy 16.3	Implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities.	The project proposes development of 102 multi-family units on 7.7 acres which would be considered compact development. The project would not impede access to existing bikeways or transit facilities. The project includes installation of sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 feet) which will improve pedestrian network connectivity for the neighborhood. The project is consistent with this policy.
Energy Policy 16.4	Encourage site and building design that reduces exterior heat gain and heat island effects (tree planting, reflective paving materials, covered parking, cool roofs, etc.).	The project will plant 102 trees and install other plantings as part of the landscape plan, which will reduce exterior heat gain. The project is consistent with this policy.
Energy Policy 16.13	Require new utility lines to be constructed underground, and along existing utility corridors, when feasible	The project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project would underground five existing SDG&E power poles along North Iris Lane. Four of the poles are along the project frontage and one pole is located approximately 60 feet north of the project site on North Iris Lane. The project applicant will coordinate with SDG&E for the undergrounding of these poles. If the project utilizes natural gas, it would connect to the existing gas line within North Iris Lane. The project is consistent with this policy.
Goal 17: Telecommunications	**Quality communication systems that enhance economic viability, governmental efficiency, and equitable access for all.**	As discussed in Section 3.16 (Utilities and Service Systems), communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. However, no specific systems upgrades are proposed with this project, and the location and extent of future facilities is not known at this time. Thus, the project would not result in physical impacts associated with the construction of communications systems. The project is consistent with this goal.
Telecommunications Policy 17.5	Establish requirements for the installation of state-of-the-art internal telecommunications technologies in new large-scale planned	As discussed in Section 3.16 (Utilities and Service Systems), communications systems for telephones, computers, and cable television are serviced by utility

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	communities, and office and commercial developments (e.g., wiring of all new housing and businesses).	providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. However, no specific systems upgrades are proposed with this project, and the location and extent of future facilities is not known at this time. Thus, the project would not result in physical impacts associated with the construction of communications systems. The project applicant would comply with any requirements for installation of internal telecommunications technologies in place at the time of issuance of a building permit. The project is consistent with this policy.
Telecommunications Policy 17.6	Encourage the installation of telecommunications systems (e.g., internet) in every city household to facilitate resident access to information about public services, transit, emergencies, and other information.	As discussed in Section 3.16 (Utilities and Service Systems), communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. The project applicant would comply with any requirements for installation of internal telecommunications technologies in place at the time of issuance of a building permit. The project is consistent with this policy.
Chapter V Community Health and Services		
Goal 1: Health and Wellness	**A healthy and livable Escondido complete with adequate and convenient access to community services and fresh food for all residents.**	The project is consistent with the applicable policy that supports this goal. Therefore, the project is consistent with this goal.
Health and Wellness Policy 1.12	Coordinate with appropriate agencies to support pest/vector management strategies (e.g., mosquito control) and public education.	As discussed in Section 3.3 (Biological Resources), the removal of trees has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This would be mitigated with the implementation of mitigation measure MM-BIO-5, which requires the preparation and implementation of an infectious tree disease management plan for the project. The project is consistent with this policy.
Goal 2: Parks and Recreation Policies	**A complete system of park and recreational facilities and programs to serve all users.**	As discussed in Chapter 2.0 (Project Description) and Section 3.14 (Recreation), open space within the project would total 97,040 s.f. (approximately 2.22 acres) and includes a mix of common open space and private open space. Table 3.14-1 summarizes the proposed open space areas. The open space areas are shown in Figure 2-11. As described below, the project is consistent with the applicable policies that support this goal. Therefore, the project is consistent with this goal.
Parks and Recreation Policy 2.3	Provide a minimum of 5.9 acres of developed active Neighborhood, Community, and Urban parks in addition to 5.9 acres of passive park land/open space for habitat preservation and additional recreational	As discussed in Section 3.14 (Recreation), as of 2012, the city had 6,556 acres of parkland and open space and, as of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	opportunities totaling 11.8 active and passive acres per 1,000 dwelling units. School playground areas can be included as park acreage if these facilities are approved by the school district(s) and open to the public as determined by the City Council.	per 1,000 units, representing an existing surplus of park and open space land. For the project to meet the requirement of 11.8 acres of parkland per 1,000 dwelling units, the addition of 98 residential units would require the provision of 1.16 acres of additional park and open space. The project includes 64,247 s.f. (1.48 acres) of common open space area with grades less than 10 percent including usable open space areas as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The proposed project also includes recreational areas totaling 11,359 s.f. (0.26 acre), including a tot lot, barbeque area, outdoor workout area, dispersed seating and patio areas throughout the site. These areas would be maintained by the Homeowners Association. Therefore, the project would provide a combined total of approximately 1.74 acres of active and passive public open space. The project would also provide a total of 21,434 s.f. (0.49 acre) of outdoor private space. Therefore, the proposed project would exceed the 1.16 acres of park/open space area General Plan requirement. Demand for recreational services from development of the proposed project would further be offset through payment of the Escondido Public Facility Development Fee, which would contribute to development of new parks and recreational facilities. As such, with payment of the required development fees in combination with provision of on-site common and private open space, the project would meet and exceed the anticipated demand for neighborhood and regional parks or other recreational facilities. The project is consistent with this policy.
Parks and Recreation Policy 2.4	Require new residential development to contribute fees to finance acquisition and development of park and recreational facilities in compliance with the standards stipulated by Parks and Recreation Policy 2.3. Allow credit for the on-site dedication of land or facilities to be used for public park purposes, consistent with city standards	As discussed above, demand for recreational services from development of the proposed project would further be offset through payment of the Escondido Public Facility Development Fee, which would contribute to development of new parks and recreational facilities. The project is consistent with this policy.
Parks and Recreation Policy 2.24	Consolidate new development onsite to accommodate parkland that is accessible to the public.	Figure 2-11 shows where the common open space areas and recreational areas will be. The majority of the acreage is along public roadways including North Iris Lane and Robin Hill Lane. Given building and setback requirements, it would not be feasible to consolidate development more than is planned. While the project site would be fenced, there is both vehicular and pedestrian access to the site. Additionally, the project includes a seating and historical interpretive area at the corner of North Iris Lane and Robin Hill Lane that would be accessible to the public. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Parks and Recreation Policy 2.25	Require park or recreation facilities constructed as part of a private development and intended solely for use by its residents to be considered a private park.	As discussed in Section 3.14 (Recreation), the project would also provide a total of 21,434 s.f. (0.49 acre) of outdoor private space which is not included in the 1.74 acres of active and passive public open space. The project is consistent with this policy.
Parks and Recreation Policy 2.27	Incorporate energy and water efficient land development and maintenance practices, including the use of drought tolerant landscaping and reclaimed irrigation, in the design, development and operation of public parks and open space areas as appropriate.	As discussed in Section 3.5 (Energy), the proposed project includes various on-site features and measures to reduce the proposed project's energy consumption and increase energy efficiency. The project's landscape plan focuses on low water use plants and the irrigation system would be designed in compliance with the City's Water Efficient Landscape Ordinance (WELO). The project is consistent with this policy.
Goal 5: Schools and Education Policies	**An educated and informed citizenry through quality education and lifelong learning opportunities.**	Section 3.13 (Public Services) analyzed the potential for the project to impact local schools. As discussed below, there would be adequate capacity in the schools to serve the students generated by the proposed project. The applicant would also pay school mitigation fees to assist the school district's long-range plans. The project is consistent with the applicable policy supporting this goal and is therefore consistent with this goal.
Schools and Education Policy 5.2	Include school districts in review of residential development applications to determine if there will be changes in enrollment, and if these changes are consistent with districts' long-range master plans.	The City has coordinated with the applicable school districts. As discussed in Section 3.13 (Public Services), the project site is located within the service boundary of the Escondido Union School District (EUSD) for elementary and middle school and within the Escondido Union High School District (EUHSD) for high school. Based on enrollment and capacity data, there would be enough capacity in the schools to serve the students generated by the proposed project. Additionally, the project applicant shall pay school mitigation fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. Payment of these fees would assist in funding EUSD's and EUHSD long-range plans. State Bill (SB) 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Such payment shall provide "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995(h)). As such, with contribution of required development fees, impacts to schools were determined to be less than significant. The project is consistent with this policy.
Goal 6: Civic Engagement Policies	**An engaged and informed citizenry with influence on policies and decisions at the local, state, and federal levels.**	The community has been informed of the project. A Notice of Preparation was distributed for the project on July 1, 2021. An online scoping meeting was held July 22, 2021 from 3:00 PM to 5:00 PM. The scoping meeting included presentation

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		from City staff on the proposed project and a time for questions and answers from the public. Additional opportunities for public engagement include noticing the release of the DEIR for public review and the public hearings. The project is consistent with this goal.
Civic Engagement Policy 6.4	Support developers' efforts to initiate early and frequent communication with the community regarding project proposals.	The community has been informed of the project. A Notice of Preparation was distributed for the project on July 1, 2021. An online scoping meeting was held July 22, 2021 from 3:00 PM to 5:00 PM. The scoping meeting included presentation from City staff on the proposed project and a time for questions and answers from the public. Additional opportunities for public engagement include noticing the release of the DEIR for public review and the public hearings. The project is consistent with this policy.
Chapter VI Community Protection		
Goal 1: Disaster Preparedness and Emergency Response	**A prepared and responsive community in the event of disasters and emergencies.**	Section 3.13 (Public Services) analyzed the potential for the project to impact adequate fire protection and emergency medical services. Section 3.8 (Hazards and Hazardous Materials) analyzed impacts to emergency response and evacuation plans, and Section 3.15 (Transportation) analyzed the project's impacts related to design hazards and emergency access. Less than significant impacts were identified. As discussed below, the project is consistent with the applicable policy supporting this goal and is therefore consistent with this goal.
Emergency Services Policy 1.6	Require minimum road and driveway widths and clearances around structures consistent with local and State requirements to ensure emergency access.	As discussed in Section 3.15 (Transportation), the project has been designed to incorporate a 24-foot wide gated secondary exit-only driveway at the eastern boundary of the project site to connect with North Iris Lane. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to inadequate emergency access were identified. Impacts related to emergency access would be less than significant. The project is consistent with this policy.
Goal 2: Fire Protection	**Protection of life and property through adequate fire protection and emergency medical services.**	Section 3.13 (Public Services) analyzed the potential for the project to impact adequate fire protection and emergency medical services. Due to the project's proximity to Fire Station No. 3, as well as payment of public facility fees that go toward addressing the Escondido Fire Department's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities. As discussed below, the project is consistent

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		with the applicable policies supporting this goal and is therefore consistent with this goal.
Fire Protection Policy 2.2	Provide Fire Department response times for no less than 90 percent of all emergency responses with engine companies by achieving the following service standard: • Provide an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Advanced Life Support (ALS) calls and a maximum response time of ten (10)	As discussed in Section 3.13 (Public Services), the closest fire station to the project site is Escondido Station No. 3 located at 1808 North Nutmeg Street, approximately 0.75 mile southwest of the project site. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner shall pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for fire protection services. Due to the project's proximity to Fire Station No. 3, as well as payment of public facility fees that go toward addressing the Escondido Fire Department's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities. The project is consistent with this policy.
Fire Protection Policy 2.4	Require new residential and non-residential development to be constructed consistent with the California Fire Code and the requirements set by the State.	The project would be required to comply with the California Fire Code and the requirements set by the State. The project is consistent with this policy.
Fire Protection Policy 2.6	Require new development to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development	As discussed in Section 3.13 (Public Services), as a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner shall pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for fire protection services. The project is consistent with this policy.
Fire Protection Policy 2.7	Continue to include the Fire Department in the review of development proposals to ensure that projects adequately address safe design and on-site fire protection.	As discussed in Section 3.15 (Transportation), the project has been designed to incorporate a 24-foot wide gated secondary exit-only driveway at the eastern boundary of the project site to connect with North Iris Lane. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to safe design and inadequate emergency access were identified. The project is consistent with this policy.
Fire Protection Policy 2.8	Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow	As discussed in Section 3.15 (Transportation), the project has been designed to incorporate a 24-foot wide gated secondary exit-only driveway at the eastern boundary of the project site to connect with North Iris Lane. The internal drive aisle

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	requirements in the review of all development applications to minimize fire hazards.	and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to safe design and inadequate emergency access were identified. The project is consistent with this policy.
Fire Protection Policy 2.10	Establish and maintain an adequate fire flow in relation to structure, size, design, and requirements for construction and/or built-in fire protection.	The project would be required to comply with all applicable building and fire code regulations including requirements for adequate fire flow. Additionally, the project design has also been reviewed by the Fire Marshal and no issues were identified. The project is consistent with this policy.
Fire Protection Policy 2.12	Maintain close coordination between planned roadway and other circulation improvements in the city to assure adequate levels of service and response times to all areas of the community.	As discussed in Section 3.15 (Transportation), a Local Mobility Analysis was prepared for the proposed project to assess transportation effects including the project's effects on roadway and intersection level of service (LOS). The project results in traffic effects under Existing, Near Term or Long Term Year 2035 conditions on the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway (LOS E). Implementation of project design features and regulatory compliance measures, as detailed at the beginning of Section 3.15.4 will improve operations of this segment to LOS C. The project is consistent with this policy.
Fire Protection Policy 2.14	Require new development in high wildfire risk areas to incorporate site design, maintenance practices, and fire resistant landscaping to protect properties and reduce risks.	As discussed in Chapter 4.0 Other CEQA Considerations, the project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). Additionally, the project design has also been reviewed by the Fire Marshal and no issues were identified. The project would be required to comply with all applicable building and fire code regulations including requirements for site design, maintenance practices, and landscaping. The project is consistent with this policy.
Fire Protection Policy 2.16	Require fire protection plans for mitigation of potential grass and wildland fires within designated high fire hazard areas and other areas required by the Fire Department, that address the need for fire systems, water availability, secondary emergency access routes, construction requirements, and fire resistant landscaping and appropriate defensible space around structures.	As discussed in Chapter 4.0 (Other CEQA Considerations), the project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). Additionally, the project design has also been reviewed by the Fire Marshal and no issues were identified. The project would be required to comply with all applicable building and fire code regulations including requirements for site design, maintenance practices, and landscaping. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Goal 3: Police Services	**Protection of life and property, and enforcement of law that enhances personal safety in the community**	Section 3.13 (Public Services) analyzed the potential for the project to impact adequate police protection. Due to the project's proximity to Escondido Police and Fire Headquarters, as well as payment of public facility fees that go toward addressing the Escondido Police Department's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities. As discussed below, the project is consistent with the applicable policies supporting this goal and is therefore consistent with this goal.
Police Services Policy 3.2	Maintain an initial response time for Priority 1 calls of no more than five (5) minutes and an initial response time for Priority 2 calls of no more than six and one-half (6½) minutes. Constantly review these standards to ensure their adequacy and appropriateness in consideration of resource availability.	As discussed in Section 3.13 (Public Services), the proposed project would be served by Escondido Police and Fire Headquarters located at 1162 North Center City Parkway, approximately 1.4 miles south of the project site. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner shall pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. Development fee payments would go towards providing the additional staff and equipment that would be needed by the Escondido Police Department in the future to provide police protection services. Thus, while the proposed project would place increased demand on police protection services, it is not anticipated that the proposed project would impact response times or result in the need for construction or expansion of existing police facilities. The project is consistent with this policy.
Police Services Policy 3.5	Require new development to contribute fees to maintain police facilities and equipment that meet the needs of the community.	As discussed in Section 3.13 (Public Services), as a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner shall pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for police protection services. The project is consistent with this policy.
Police Services Policy 3.7	Require that defensible space practices that contribute to personal and property safety and crime prevention be incorporated into development projects, such as security and design features (e.g., site and building lighting, visual observation of areas, secured areas).	As discussed in Chapter 2.0 (Project Description), nighttime exterior lighting would be provided on the residential development site for safety, security, and circulation purposes. Vehicular and pedestrian gates are proposed at the project's primary entrance and the secondary exit-only driveway. Additionally, project plans will be reviewed by the Escondido Police Department and recommendations and requirements related to defensible space practices and security/ design features will be incorporated. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Goal 5: Noise	**Protection of the community from excessive noise exposure**	A Noise Study (Appendix L) was prepared for the proposed project and analyzed the potential for the project to impact nearby sensitive uses and summarized in Section 3.11 (Noise) of the EIR. The analysis concluded that if a rock drill is staged within 160 feet of any occupied noise sensitive land use, sound levels could exceed 75 dBA at property lines. Implementation of mitigation measure MM-N-1, which will be required as a condition of project approval, will reduce the impact to below a level of significance. All other noise impacts were determined to be less than significant. Therefore, the project is consistent with this goal.
Noise Policy 5.1	Require development to meet acceptable exterior noise level standards as established in Figure VI-2, and use the future noise contour map (FigureVI-17) as a guide for evaluating the compatibility of new noise sensitive uses with projected noise levels.	As discussed in Section 3.11 (Noise), exterior noise levels from operation and noise levels from North Iris Lane would not exceed the City's 65 dBA CENL exterior noise standards. The project is consistent with this policy.
Noise Policy 5.2	Apply a CNEL of 60 dB or less for single family and 65 dB or less for multi-family as goals where outdoor use is a major consideration (back yards and single family housing developments, and recreation areas in multifamily housing developments) as discussed in Figure VI-13, and recognize that such levels may not necessarily be achievable in all residential areas.	As discussed in Section 3.11 (Noise), exterior noise levels from operation and noise levels from North Iris Lane would not exceed the City's 65 dBA CENL exterior noise standards. The project is consistent with this policy.
Noise Policy 5.4	Require noise attenuation for new noise-sensitive uses which include residential, daycare facilities, schools, churches, transient lodging, hotels, motels, hospitals, health care facilities, and libraries if the projected interior noise standard of 45 dBA CNEL is exceeded.	To ensure compliance with the CCR Title 24 interior noise threshold of 45 dBA CNEL, a final noise assessment shall be performed prior to the issuance of building permits. This final report shall identify the interior noise requirements based on architectural and building plans to meet the City's established interior noise limit. The identified interior noise requirements, which may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane. Compliance with this requirement of Title 24 will ensure potential impacts are less than significant. The project is consistent with this policy.
Noise Policy 5.5	Require construction projects and new development to ensure acceptable vibration levels at nearby noise-sensitive uses based on Federal Transit Administration criteria.	As discussed in Section 3.11 (Noise), average vibration levels that would be experienced at the nearest vibration sensitive uses from temporary construction activities would result in vibration levels below the Federal Transit Authority's (FTA) criteria for vibration-induced structural damage and nuisance for nearby residential uses. Therefore, vibration impacts from construction equipment would be less than significant. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Noise Policy 5.6	Require the preparation of noise studies, as deemed necessary by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14.	A Noise Study (Appendix L) was prepared for the proposed project and analyzed the potential for project impacts related to temporary and or permanent increase in ambient noise levels, excessive groundborne vibration. All impacts were determined to be less than significant and no mitigation is required. The project is consistent with this policy.
Noise Policy 5.7	Encourage use of site and building design, noise barriers, and construction methods as outlined in Figure VI-15 to minimize impacts on and from new development.	As discussed in Section 3.11 (Noise), temporary and permanent exterior noise levels from construction, operation and roadway noise would not exceed the City's noise thresholds. However, since noise levels at the facades of Buildings 20, 18, 17, 13, and 12 along North Iris Lane measured above 60 dBA CNEL, interior noise levels could exceed the City's established interior noise limit of 45 dBA CNEL, per Title 24. To ensure compliance with the CCR Title 24 interior noise threshold of 45 dBA CNEL, a final noise assessment shall be performed prior to the issuance of building permits. This final report shall identify the interior noise requirements based on architectural and building plans to meet the City's established interior noise limit. The identified interior noise requirements, which may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane. Compliance with this requirement of Title 24 will ensure potential impacts are less than significant. The project is consistent with this policy.
Noise Policy 5.8	Require that mixed use and multi-family residential developments demonstrate that the design of the structure will adequately isolate noise between adjacent uses (orientation, window insulation, separation of common walls, floors, and ceilings, etc.).	Per discussion above for Noise Policy 5.7, the project's compliance with Title 24 interior noise thresholds of 45 dBA CNEL will ensure that potential impacts are less than significant. Interior noise requirements included in the final noise assessment may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane. The project is consistent with this policy.
Noise Policy 5.10	Require development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.	A Noise Study (Appendix L) was prepared for the proposed project and analyzed the potential for the project to impact nearby sensitive uses and summarized in Section 3.11 of the EIR. The analysis concluded that if a rock drill is staged within 160 feet of any occupied noise sensitive land use, sound levels could exceed 75 dBA at property lines. Implementation of mitigation measure MM-N-1, which will be required as a condition of project approval, will reduce the impact to below a level

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		of significance. All other noise impacts were determined to be less than significant. The project is consistent with this policy.
Noise Policy 5.11	Limit direct access from individual properties along Major Roads and Prime Arterials in residential areas in order to minimize gaps in noise barrier sound walls	As discussed in Chapter (2.0 Project Description), access to the project site would be via one driveway on Robin Hill Lane which would provide a private gated circular bulb turnaround entry with access to ingress and egress. A 24-foot-wide gated secondary exit-only driveway would be provided at the eastern boundary of the project site to connect with North Iris Lane. The conceptual fencing and wall plan is presented in Figure 2-12. Along the frontage of North Iris Lane would be a 6-foot high freestanding masonry wall with the exception of the entry frontage, which would be tubular steel. On the project's northern boundary on Robin Hill Lane would be a mix of 6-foot high freestanding masonry wall (east of the project's main entrance), and 6-foot high steel tubing fence (west of the project's main entry). Vehicular and pedestrian gates are proposed at the project's primary entrance and the secondary exit-only driveway. As discussed in Section 3.11 (Noise), all project impacts related to noise were determined to be less than significant. The project is consistent with this goal.
Goal 7: Soils and Seismicity	**Minimization of adverse effects to residents, property, and critical facilities caused by geologic and seismic hazards.**	A Geotechnical Investigation and Seismic Refraction Study were prepared for the proposed project to identify and address potential impacts related to geologic and seismic hazards. These reports are included in Appendix J1 and J2 and summarized in Section 3.6 (Geology and Soils). Section 3.6 (Geology and Soils) addressed the potential for impacts related to geologic and seismic hazards, including earthquake fault rupture; strong seismic groundshaking; seismic-related ground failure, including liquefaction; landslides; soil erosion or loss of topsoil; unstable soil; expansive soil; and septic tanks. With adherence to the California Building Code, seismic design specifications of the Structural Engineers Association of California, all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA), all requirements of Article 55 of the City Municipal Code that establishes grading and erosion control regulations for the City, other applicable regulations and implementation of the recommendations within the project specific geotechnical investigation report (GEOCON 2021), the project would not expose people or structures to potential substantial adverse effects, Less than significant impacts were identified for each of these issue areas. The project is consistent with this goal. Specific Soils and Seismicity Policies under this goal were not applicable to the project because the site is not located in geologic hazards areas, such as slopes greater than 25%, or areas susceptible to erosion and sediment loss.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Goal 8: Hazardous Materials	**A safe and healthy community and environment that is protected from the use, storage, and transport of hazardous materials.**	Section 3.8 (Hazards and Hazardous Materials) analyzed the project's potential risk from routine transport, use, or disposal of hazardous materials. Construction of the proposed residential development would involve the use of common but potentially hazardous materials, including solvents, vehicle fuels, oils, grease, paints, caulking, cleaning materials, and caustic construction compounds. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these common, potentially hazardous materials would occur in accordance with Cal OSHA guidelines and would be disposed of in accordance with DTSC and County regulations. During operation, transport, use, and disposal of hazardous materials at the proposed residences would include minor amounts of materials, would be similar to existing surrounding residential development, and would be intermittent and not considered routine. The use, handling, and disposal of these products is addressed by household hazardous waste programs that are part of the Integrated Waste Management Plan (IWMP) of the County of San Diego. The Household Hazardous Waste Element of the IWMP specifies how hazardous wastes generated by households shall be collected, recycled, treated, and disposed of safely. Because compliance with all standards is required through federal, state, county, and municipal regulations, no significant impacts to the public or the environment are expected due to the routine transport, use, or disposal of hazardous materials during project construction or operation. Therefore, proposed project impacts would be less than significant. The project is consistent with this goal.
Chapter VII Resource Conservation		
Goal 1: Biological and Open Space Resources	**Preservation and enhancement of Escondido's open spaces and significant biological resources as components of a sustainable community.**	Section 3.3 (Biological Resources) addressed the project's potential for impacts to biological resources and identified mitigation measures that would reduce those impacts to below a level of significance. The project site is currently developed with single family residences and is surrounded by residential development. The project site is not located in a biologically sensitive area, wildlife corridor, habitat linkage or an area identified as open space. As discussed, below, the project is consistent with all applicable policies related to biological and open space resources. The project is consistent with this goal.
Biological and Open Space Resources Policy 1.6	Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, require mitigation of resources either on- or off-site at ratios consistent	As discussed in Section 3.3 (Biological Resources), the proposed project would not result in significant direct or indirect impact on special – status plants or wildlife. Based on the presence of suitable avian nesting habitat, pre-construction clearance surveys for nesting birds would be conducted to ensure that no impacts on nesting birds that are afforded protection under the Migratory Bird Treaty Act (MBTA) occur

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
	with State and federal regulations, and in coordination with those agencies having jurisdiction over such resources.	(See MM-BIO-1). The project would result in direct and permanent impacts to 2.6 acres of sensitive natural communities including 0.1 acre of disturbed wetland, and 2.5 acres of non-native grassland. Purchase of applicable credits in a city-approved mitigation bank would fully compensate for the loss of habitat. With the implementation of mitigation measure MM-BIO-2, impacts on sensitive natural communities would be reduced to below a level of significance. The project would result in potentially significant impacts to US Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) jurisdictional resources (0.05 acre and 494 linear feet of Non-wetland Water of the US). The project would also result in potentially significant impacts to 0.12 acre of California Department of Fish and Wildlife (CDFW) jurisdiction (0.10 acre of disturbed wetland and 0.02 acre of streambed). Mitigation is proposed at minimum standard ratios consistent with those typically required by the Resource Agencies; thus, would fully compensate the loss and reduce impacts to below a level of significance. With the implementation of mitigation measureMM-BIO-3, impacts to potentially jurisdictional resources would be less than significant. Notification for securing necessary regulatory permits prior to impacts would be required for the project per MM-BIO-3. If the potential wetlands or waters of the U.S. are ruled jurisdictional by the Resource Agencies, the anticipated permits would be a 404 permit from the USACE, 401 Certification from the RWQCB, and a 1602 agreement from CDFW. Final permit requirements would be determined through consultation with the Resource Agencies. The project is consistent with this policy.
Biological and Open Space Resources Policy 1.7	Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.	HELIX biologist Amy Mattson conducted a general biological survey of the project study area (i.e., project site and surrounding areas within 150 feet) on August 12, 2020, to map existing vegetation communities, evaluate habitats for the potential to support sensitive species, and note other potentially sensitive biological resources that occur or may occur on-site and in the immediate vicinity. Rare plant surveys were conducted on April 21, 2021 and June 15, 2021 by Ms. Mattson. Oak trees were also mapped during the June 2021 site visit. A formal jurisdictional delineation was conducted by HELIX biologists Jason Kurnow and Stacy Nigro on August 24, 2020. See discussion related to Biological and Open Space Resources Policy 1.6, above, for the findings of those surveys. Based on the presence of suitable avian nesting habitat on the project site, pre-construction clearance surveys for nesting birds will be conducted to ensure that no impacts on nesting birds that are afforded protection under the Migratory Bird Treaty Act (MBTA) occur (See MM-BIO-1). The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Biological and Open Space Resources Policy 1.8	Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.	As discussed in response to Policy 1.6 above, with the implementation of mitigation measure MM-BIO-2, impacts on sensitive natural communities would be reduced to below a level of significance. Per Section 3.3 (Biological Resources), the project is adjacent to already developed or disturbed areas and will comply with stormwater regulations, including implementation of a stormwater pollution and prevention plan (SWPPP) during construction. During project operation, no impact is anticipated due to a comprehensive water quality management approach and implementation of site design, source control, low impact development (LID), and treatment control BMPs further described in Section 3.9 (Hydrology/Water Quality). Per MM-BIO-1, if active bird nests are confirmed to be present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive. The project is consistent with this policy.
Biological and Open Space Resources Policy 1.9	Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.	A total of seven mature coast live oak trees and six protected coast live oak trees occur within the project site and would be subject to removal during proposed development. An additional 10 mature and 11 protected coast live oak trees occur just outside of the project site and are considered impacted, with exception of the subset occurring within a VWD easement (Figure 3.3-6 and Table 3.3-7). The subset located within the VWD easement will be protected by a 10-foot grading setback along the southern property boundary. The project arborist indicated a 10-foot buffer is a sufficient distance to protect these oaks trees and recommend establishing root zone protection zones and fencing during construction (Lightfoot Planning Group 2022). For all other adjacent oak trees, the intent is to avoid impacts; however, their root zones may encroach onto the project site and could be damaged. Project impacts to mature and/or protected trees would be mitigated with the implementation of mitigation measure MM-BIO-4, which requires that a vegetation removal permit and appropriate standards for the replacement of vegetation approved for removal be followed, and mature and/or protected tree preservation or replacement would occur. With the implementation of mitigation measure MM-BIO-4, impacts to mature and/or protected trees would be reduced to below a level of significance.
Biological and Open Space Resources Policy 1.10	Prohibit any activities in riparian areas other than those permitted by appropriate agencies to protect those resources.	See the Biological and Open Space Resources Policy 1.6 discussion above for identified impacts and mitigation related to jurisdictional areas. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Biological and Open Space Resources Policy 1.11	Construct appropriate barriers to be maintained by property owners or homeowners' associations that restrict access to areas containing sensitive biological resources.	Mitigation measures MM- BIO-1 through MM-BIO-3 would reduce the project's direct impacts to sensitive biological resources to below a level of significance. With the exception of the potential for nesting birds (addressed by MM0-BIO-1), there would be no sensitive biological resources areas on the project site. Further, the project site is bounded on all sides by residential development. The project is consistent with this policy.
Biological and Open Space Resources Policy 1.12	Promote the use of native plants for public and private landscaping purposes within the city.	The proposed landscape plan includes a mix of trees, shrubs, grasses and groundcover. The planting palette focuses on native and/or drought-tolerant species. The project would plant approximately 171 trees internal to the project plus additional street trees along the project frontages with North Iris Lane and Robin Hill Lane. Proposed tree species include desert willow, Indian hawthorn, California laurel, Carolina cherry, fern pine, western redbud, European olive, Mexican palo verde, African sumac, strawberry tree, flaxleaf paperbark, coast live oak, queen palm and Mexican fan palm. The proposed street tree species, golden rain tree, is consistent with surrounding areas and would provide continuity throughout the adjacent community. The project is consistent with this policy.
Goal 3: Visual Resources	**Preservation of significant visual resources such as ridgelines, hillsides, and viewsheds that serve as a scenic amenity and contribute to the quality of life for residents.**	Section 3.1 (Aesthetics) addressed the project's potential for impacts to scenic vistas, scenic resources/ State Scenic Highways, visual character and quality and lighting and glare and concluded that all impacts would be less than significant. The project site does not contain any significant visual resources or amenities that would need to be preserved. As discussed below, the project is consistent with all applicable policies related to aesthetics. The project is consistent with this goal.
Visual Resources Policy 3.1	Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state, to the extent possible.	As discussed in Section 3.1 (Aesthetics), the project site is not located on a ridgeline, hillside or within a scenic viewshed. The site is situated at a similar elevation as surrounding development and currently supports four single family residences and outbuildings. Given there are no scenic vistas on the project site or in the vicinity, impacts were determined to be less than significant. The project is consistent with this policy.
Visual Resources Policy 3.2	Require new development to avoid obstructing views of, and to minimize impacts to, significant visual resources through the following: creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks.	As discussed in Section 3.1 (Aesthetics), the proposed project does not contain nor impede views of key visual resources, including scenic resources and highways. The project would develop the site in an orderly fashion with a comprehensive design concept, landscape plan, and wall/fencing plan that would not degrade existing visual character or quality of the site and its surroundings. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Visual Resources Policy 3.3	Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.	As discussed in Section 3.1 (Aesthetics), the project has been designed in a manner to not conflict with the regulations that govern scenic quality. The project would comply with the City's Outdoor Lighting Ordinance, Grading Ordinance and the City's Tree Protection Ordinance. Impacts related to aesthetics were determined to be less than significant. The project is consistent with this policy.
Goal 5: Historic and Cultural Resources	**Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.**	Section 3.4 (Cultural Resources) addressed the project's potential for impacts to cultural resources and Section 3.6 (Geology and Soils) addressed the project's potential for impacts to paleontological resources. The project site is currently developed with single family residences and is surrounded by residential development. No significant resources were identified on site. The four existing residences were assessed for historical significance and found to be less than significant. Mitigation measures in Sections 3.4 and 3.6 address the potential for unknown cultural and paleontological resources and would reduce those impacts to below a level of significance. As discussed below, the project is consistent with all applicable policies related to cultural resources. The project is consistent with this goal.
Cultural Resources Policy 5.2	Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.	Section 3.4 (Cultural Resources) addressed the project's potential for impacts to cultural resources. No significant resources were identified on site and mitigation measures MM-CR-1 through MM-CR-9 would reduce the potential for significant impacts to currently unknown cultural resources to below a level of significance. Section 3.6 (Geology and Soils) addressed the project's potential for impacts to paleontological resources. No significant resources were identified on site and mitigation measure MM-GEO-1 would reduce the potential for significant impacts to currently unknown paleontological resources to below a level of significance. The project is consistent with this policy.
Cultural Resources Policy 5.3	Consult with appropriate organizations and individuals (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.	The Cultural Resources Survey Report prepared for the project (Appendix F), included a field survey, a records search from the South Coastal Information Center (SCIC), and a Sacred Lands File search by the Native American Heritage Commission (NAHC). Tribal consultation per Assembly Bill 52 has also been conducted. The project is consistent with this policy.
Cultural Resources Policy 5.4	Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.	See discussion related to Cultural Resources Policy 5.3 above regarding the cultural resources assessment conducted for the project. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Cultural Resources Policy 5.6	Review proposed new development and/or remodels for compatibility with the surrounding historic context.	The cultural resources survey identified four standing structures of historic age (2039 North Iris Lane, 2047 North Iris Lane, 2085 North Iris Lane, 2089 North Iris Lane) within the project area. None of these structures have been previously evaluated for eligibility to the California Register of Historical Resources. Based on evaluation of the history and resources on the project site, and consideration of the ability of those resources to reflect the historic contexts with which they are associated, the standing structures would not be eligible as individual historic resources for listing in the National Register of Historic Policies (NRHP), California Register of Historical Resources (CRHR), and City of Escondido Local Register of Historic Places. The buildings are not considered historical resources for the purposes of CEQA, and impacts on historic resources would be less than significant. Further the project would be designed in a manner consistent and compatible with the surrounding residential development. The project would have a Traditional Farmhouse architectural style. Proposed materials include wood, stucco, and siding with decorative trims. The project is consistent with this policy.
Goal 6: Water Resources and Quality	**Preservation and protection of the City's surface water and groundwater quality and resources.**	A Preliminary Drainage Study and Priority Development Project Stormwater Quality Management Plan (SWQMP) were prepared to analyze the project's potential impacts to hydrology and water quality. These reports are included in Appendix J1 and J2 and summarized in Section 3.9 (Hydrology and Water Quality). With adherence to existing regulations and implementation of combination facilities for hydromodification and treatment, as well as construction, source control, and site design BMPs, less than significant impacts were identified for hydrology and water quality. Section 3.3 (Biological Resources) addressed potential impacts to wetlands and concluded that impacts would be mitigated to less-than-significant. Also, Section 3.6 (Geology and Soils) addressed potential impacts related to septic tanks and concluded that no impact would occur. As discussed below, the project is consistent with all applicable policies related to hydrology and water quality. Therefore, the project is consistent with this goal.
Water Resources and Quality Policy 6.2	Protect the surface water resources in the city including Lake Wohlford, Dixon Lake, Lake Hodges, Escondido Creek, and other waterways.	As identified in Section 3.9 (Hydrology and Water Quality), impaired water bodies in the Escondido Creek system, within which the project site is located, include San Elijo Lagoon and Escondido Creek. In accordance with the City's National Pollution Discharge Elimination System (NPDES) regulations, the project will be required to secure a General Construction Activity Stormwater Permit, which will require the preparation of a SWPPP and implementation of BMPs. These measures are designed to minimize the generation of pollutants, including sediment and trash/debris and would ensure that the proposed project would not result in significant alteration of receiving water quality during construction.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		Based upon the analysis in the preliminary Storm Water Quality Management Plan (SWQMP) prepared for the proposed project, the proposed project includes a comprehensive water quality management approach that incorporates biofiltration features and source control and site design BMPs to ensure that there would not be an increase in pollutant discharge to receiving waters. The stormwater management design for the project was developed to be consistent with the Priority Development Project (PDP) requirements of the City of Escondido Storm Water Design Manual, which provides the guidance necessary to comply with the City of Escondido Municipal Code (Chapter 22, Article 2) and regional MS4 Permit ([RWQCB San Diego Region Order R9-2013-0001 as amended). Therefore, the project's water quality management approach would effectively treat stormwater runoff prior to discharge from the site and to receiving waters. The proposed project would not result in significant alteration of receiving water quality following construction. The project is consistent with this policy.
Water Resources and Quality Policy 6.3	Protect the sustainability of groundwater resources.	As discussed in Section 3.9 (Hydrology and Water Quality), the project would not use any groundwater nor would it 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. Therefore, the project would not impede sustainable groundwater management of the basin. The project is consistent with this policy.
Water Resources and Quality Policy 6.4	Require new development to preserve areas that provide opportunities for groundwater recharge (i.e., areas where substantial surface water infiltrates into the groundwater), stormwater management, and water quality benefits.	The project site is currently developed with four residential units and is surrounded by residential developments. As described above in the Water Resources and Quality Policy 6.3 discussion, the project would increase impervious surfaces on the site but it would not interfere substantially with groundwater recharge. Additionally, the site has been carefully designed to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. Post-development flows would be the same as in the pre-development condition due to the implementation of a comprehensive drainage plan, including the use of combination biofiltration facilities and BMPs. The project would implement a project-specific SWPPP per the NPDES permit program and implementation of associated BMPs to prevent construction-related runoff from polluting receiving waters. Additionally, the proposed project has been designed to incorporate biofiltration and other source and site control BMPs to limit the potential for water quality impacts to the greatest extent feasible. No significant hydrology or water quality impacts were identified for the project. The project is consistent with this policy.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Water Resources and Quality Policy 6.6	Control encroachments into wetlands and designated floodways to protect the community's water resources.	As discussed in Section 3.3 (Biological Resources), the project would result in direct and permanent impacts to 0.1 acre of disturbed wetland. Purchase of applicable credits in a City-approved mitigation bank would fully compensate for the loss of habitat (MM-BIO-2). Also, per FEMA's Flood Insurance Rate Maps, the project site is located within Zone X, Area of Minimal Flood Hazard, and is not located within a 100-year flood hazard area. The project is consistent with this policy.
Water Resources and Quality Policy 6.12	Regulate construction and operational activities through the use of stormwater protection measures in accordance with the City's National Pollution Discharge Elimination System (NPDES) permit.	As described in more detail in the discussion of Water Resources and Quality Policy 6.2, the project would comply with the City's NPDES permit requirements. The project is consistent with this policy.
Water Resources and Quality Policy 6.14	Require new development to protect the quality of water resources and natural drainage systems through site design and use of source controls, stormwater treatment, runoff reduction measures, best management practices, and Low Impact Development measures.	As described in more detail in the discussion of Water Resources and Quality Policy 6.2, the project would implement a comprehensive drainage and water quality management plan including construction, source control, and site design BMPs. The project is consistent with this policy.
Water Resources and Quality Policy 6.15	Protect Escondido's shallow groundwater basin from contamination by regulating stormwater collection and conveyance to ensure pollutants in runoff have been reduced to the maximum extent practicable.	As described in more detail in the discussion of Water Resources and Quality Policy 6.2, the project would implement a comprehensive drainage and water quality plan including construction, source control, and site control BMPs to reduce pollutants in runoff to the maximum extent practicable. The project is consistent with this policy.
Water Resources and Quality Policy 6.16	Monitor underground storage tanks containing hazardous materials and septic tank systems on a regular basis in accordance with all federal, state, and local regulations.	As described in Section 3.6 (Geology and Soils), with demolition, the existing septic tanks on the project site will be abandoned and removed. All future development would be served by the city for sewer service. As the project will not require the use of septic tanks or alternative wastewater disposal systems, no impact was identified for this issue area. The project is consistent with this policy.
Goal 7: Air Quality and Climate Protection	**Improved air quality in the city and the region to maintain the community's health and reduce green-house gas emissions that contribute to climate change.**	Air Quality and Greenhouse Gas Studies were prepared for the proposed project (Appendix D and H) to determine the potential for significant air quality and GHG impacts. As discussed in Section 3.2 (Air Quality), the project would have less than significant impacts related to compliance with regional air quality plans, criteria pollutants during construction and operation, sensitive receptors, and odors. As discussed in Section 3.7 (Greenhouse Gas Emissions), the project would be consistent with the City's GHG emissions thresholds and would have less than significant impacts related to the generation of GHG emissions during construction and operation. The project is consistent with this goal.

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
Air Quality and Climate Protection Policy 7.3	Require that new development projects incorporate feasible measures that reduce construction and operational emissions.	Based upon the analysis presented in Sections 3.2.4 and 3.2.5 of the Air Quality section, project and cumulative air quality impacts would be less than significant. Therefore, no mitigation measures are necessary. The project is consistent with this policy.
Sixth Cycle Housing Element 2021-2029		
Goal 1: Housing	**Plan for quality, managed, and sustainable growth**	Section 3.12 (Population and Housing) analyzed the project's impacts related to population growth and displacement of existing people or housing. Less than significant impacts were identified. As discussed below, the project would meet all of the policies that support this goal. Therefore, the project is consistent with this goal.
Housing Policy 1.1	Expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.	The project proposes 102-unit multi-family residential development. This includes 14 two-bedroom units, 30 three-bedroom units and 58 four-bedroom units. The project is consistent with this policy.
Housing Policy 1.2	Housing projects shall fund all or a portion of public facilities and costs for providing municipal services directly related to the need created by the development. The amount must be proportional to the cost of the service or improvement to offset the impacts to public facilities, services, and operations.	The applicant shall provide payment of the Escondido Public Facility Development Fee (Article 18B of Chapter 6 of the Escondido Municipal Code. The public facility development fee helps fund a number of public services including fire protection, police protection, libraries and parks. The applicant shall also provide payment of school fees pursuant to Article 21 of Chapter 6 of the Escondido Municipal Code. Finally, the project applicant will be required to pay RDDMWD Capital Facility Fees for potable water meter installation, as described in RDDMWD Ordinance No. 21-98.21. The project is consistent with this policy.
Housing Policy 1.4	Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.	The project is proposed on a site that is already developed with existing residences with residential units surrounding it. Sections 3.13 (Public Services) and 3.16 (Utilities and Services Systems) analyzed the project's impacts to public services and utilities and services, respectively, and found impacts to be less than significant. The project is consistent with this policy.
Housing Policy 1.6	Encourage creative residential developments and partnerships that result in desirable amenities and contribute to infrastructure needs.	The project provides common open space and recreational amenities for the project occupants. The project will contribute to roadway and intersection improvement and will also underground power lines along the project frontage. The project will contribute to infrastructure needs and is consistent with this policy.
Housing Policy 1.7	Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed-Use Overlay areas.	The project site is not located in a Mixed-Use overlay. two transit stops just over a ¼-mile walking distance (approximately 1,500 feet away) and neighborhood

General Plan Element Goal or Policy	Goal/Policy Description	Project's Consistency with Goal/Policy
		commercial uses are an approximate ½ miles away. The project will construct sidewalks along North Iris Lane and Robin Hill Road which will improve pedestrian mobility. Additionally, as part of the VMT-reduction measures, the project will contribute towards pedestrian enhancements at five intersections in the City. These improvements create for an enhanced pedestrian experience. The project is consistent with this policy.
Housing Policy 1.9	Improve affordability by promoting sustainable housing practices that incorporate 'whole system' approach to siting, designing, and constructing housing that is integrated into the building site, consumes less water and improves water quality, reduces the use of energy and other resources, and minimizes its impact on the surrounding environment.	The project incorporates sustainable features that focus on reducing energy and water consumption. Project design features are summarized in Chapter 7 of the EIR. The project has been designed to minimize impacts to the surrounding environment. The project is consistency with this policy.
Goal 2: Housing	**Provide a range of housing opportunities for all income groups and households with special needs**	The project proposes a 102-unit multi-family residential development of varying types, sizes and price points. The project is consistent with this goal.
Housing Policy 2.1	Plan for adequate development potential to accommodate the regional share of housing for all income groups and promote equal access to resources and amenities.	One of the project's objectives is to the extent possible given the site constraints, maximize the opportunity to provide housing to Escondido using the Urban III land use classification, which provides for up to 18 units per acre. The project's proposed density is 13.2 units per acre and contributes toward the regional share of housing. The project is consistent with this policy.
Housing Policy 2.2	Encourage new development to provide a range of housing by type, size, location, price, and tenure to provide a greater array of housing types.	The project proposes a 102-unit multi-family residential development. This includes 14 two-bedroom units, 30 three-bedroom units and 58 four-bedroom units. The project is consistent with this policy.

3.11 Noise

This section of the Environmental Impact Report (EIR) describes the existing ambient noise environment, including the sources of noise, in the project area in relation to noise-sensitive land uses. In addition, relevant local noise standards and guidelines are described. This section is based on the Noise Study prepared for the proposed project by LDN Consulting on July 27, 2022 (Appendix L). Background information is from the Escondido General Plan Update (City of Escondido 2012), unless otherwise referenced.

3.11.1 Existing Conditions

3.11.1.1 Characteristics of Noise and Vibration

Fundamentals of Noise

Noise is typically defined as unwanted sound. Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). Sound pressures in the environment have a wide range of values and the sound pressure level was developed as a way to describe this range of sound. The sound pressure level is the logarithm of the ratio of the unknown sound pressure to an agreed upon reference quantity of the same kind. To account for the pitch of sounds and the corresponding sensitivity of human hearing to them, the raw sound pressure level is adjusted with an A-weighting scheme based on frequency that is stated in units of decibels (A-weighted decibels [dBA]).

A given level of noise would be more or less tolerable depending on the sound level, duration of exposure, character of the noise sources, time of day during which the noise is experienced, and activity affected by the noise. For example, noise that occurs at night tends to be more disturbing than that which occurs during the day because sleep has the potential to be disturbed. Additionally, rest at night is a critical requirement in the recovery from exposure to high noise levels during the day. In consideration of these factors, different measures of noise exposure have been developed to quantify the extent of the effects anticipated from these activities. For example, some indices consider the 24-hour noise environment of a location by using a weighted average to estimate its habitability on a long-term basis.

The most commonly used indices for measuring community noise levels are the equivalent energy level (Leq), the community noise equivalent level (CNEL), and the day-night average noise level (LDN).

- **Leq** is the average acoustical or sound energy content of noise, measured during a prescribed period, such as 1 minute, 15 minutes, 1 hour, or 8 hours. It is the decibel sound level that contains an equal amount of energy as a fluctuating sound level over a given period of time.
- **CNEL** is the average equivalent A-weighted sound level over a 24-hour period. This measurement applies weights to noise levels during evening and nighttime hours to compensate for the increased disturbance response of people at those times. CNEL is the equivalent sound level for a 24-hour period with a +5 dBA weighting applied to all sound occurring between 7:00 PM and 10:00 PM. and a +10 dBA weighting applied to all sound occurring between 10:00 PM. and 7:00 AM.
- **LDN** is a 24-hour average Leq with a +10 dBA weighting applied to noise during the hours of 10:00 PM to 7:00 AM. LDN and CNEL are typically within one dBA of each other and, for most intents and purposes, are interchangeable.

The decibel level of a sound decreases (or attenuates) exponentially as the distance from the source of that sound increases. For a single point source such as a piece of mechanical equipment, the sound level normally decreases by about 6 dBA for each doubling of distance from the source. Sound that originates from a linear, or "line" source such as a heavily traveled traffic corridor, attenuates by approximately 3 dBA per doubling of distance, provided that the surrounding site conditions lack ground effects or obstacles that either scatter or reflect noise. Noise from roadways in environments with major ground effects due to vegetation and loose soils would either absorb or scatter the sound yielding attenuation rates as high as 4.5 dBA for each doubling of distance. Other contributing factors that affect sound reception include meteorological conditions, natural topography, and the presence of manmade obstacles such as buildings and sound barriers.

The most effective noise reduction methods consist of controlling the noise at the source and blocking the noise transmission with barriers. Any or all of these methods may be required to reduce noise levels to an acceptable level. To be effective, a noise barrier must have enough mass to prevent significant noise transmission through it and high enough and long enough to shield the receiver from the noise source. A safe minimum surface weight for a noise barrier is 3.5 pounds/square foot (equivalent to 3/4-inch plywood), and the barrier must be carefully constructed so that there are no cracks or openings.

Barriers constructed of wood or as a wooden fence must have minimum design considerations as follows: the boards must be ¾ inch thick and free of any gaps or knot holes. The design must also incorporate either overlapping the boards at least 1 inch or utilizing a tongue-and-grove design for this to be achieved.

3.11.1.2 Noise Effects

Noise has a significant effect on the quality of life. An individual's reaction to a particular noise depends on many factors such as the source of the noise, its loudness relative to the background noise level, and the time of day. The reaction to noise can also be highly subjective; the perceived effect of a particular noise can vary widely among individuals in a community. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a three-decibel change in community noise levels is perceivable, while one to two decibel changes generally are not noticed. A five-decibel increase is generally perceived as a distinctly noticeable increase. Although a community's reaction to changes in noise levels would vary by the individual, it is generally accepted that noise is a significant component of the environment, and excessively noisy conditions can affect an individual's health and well-being. The effects of noise are often only transitory, but adverse effects can be cumulative with prolonged or repeated exposure.

3.11.1.3 Noise-Sensitive Land Uses

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically include residences, hospitals, schools, guest lodgings, libraries, and certain types of passive recreational uses, such as parks to be used for reading, conversation, and meditation (Federal Transit Administration 2018).

Noise-sensitive land uses in the project area include the single-family residential units west of Robin Hill Lane, single-family residential units south of the site, attached single-family residential to the north and the Meadowbrook Village care facility (a mix of semi-independent and congregate care units).

3.11.1.4 Ground-Borne Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Human response to vibration is best approximated by the vibration velocity level.

Heavy equipment operation, including stationary equipment that produces substantial oscillation or construction equipment that causes percussive action against the ground surface, may be perceived by building occupants as perceptible vibration known as "structureborne/groundborne" vibration. Vibration in buildings is typically perceived as rattling of windows or items on shelves or the motion of building surfaces. The vibration of building surfaces can also be radiated as sound and heard as a low-frequency rumbling noise, known as groundborne noise. Although the perceived vibration from such equipment operation can be intrusive to building occupants, the vibration is seldom of sufficient magnitude to cause even minor cosmetic damage to buildings unless the receptors are in proximity to heavy equipment.

Vibration energy spreads out as it travels through the ground, causing the vibration amplitude to rapidly decrease with distance away from the source. Soil properties also affect the propagation of vibration. Man-made vibration issues are, therefore, usually confined to short distances from the source (i.e., 50 feet or less). Vibration amplitudes are usually described in terms of peak levels, as in peak particle velocity (PPV) in inches/second that correlates best with human perception. The particle velocity is the velocity of the soil particles resulting from a disturbance.

3.11.1.5 Existing Noise and Vibration

The project site is currently developed with four single family residences surrounded by a residential community. The site does not currently contain any sources of vibration generation.

Existing ambient noise measurements were collected by LDN Consulting using a Larson-Davis Model LxT Type 1 precision sound level meter, programmed, in "slow" mode, to record noise levels in "A" weighted form. The sound level meter and microphone were mounted on a tripod, five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was calibrated before and after the monitoring using a Larson-Davis calibrator, Model CAL 200.

The ambient measurements were conducted on April 15, 2021 between 9:15 am –9:30 am. The monitoring location is shown in **Figure 3.11-1.**

The results of the noise level measurements are presented in **Table 3.11-1.** The measurements were taken on site to establish a baseline of the vehicle noise from N Iris Lane. The measurements were free of obstruction and had a direct line of sight to the roadways. The overall sound level was found to be 59.0 dBA.

Table 3.11-1. Measured Ambient Noise Levels

Measurement Identification	Description	Date/Time	Noise Levels (dBA Leq)					
			Leq	Lmax	Lmin	L10	L50	L90
ML 1	North Iris Lane	April 15, 2021 9:15 AM to 9:30 AM	59.0	70.1	41.8	63.4	55.1	46.7

Source: LDN Consulting 2022c.

3.11.2 Regulatory Framework

3.11.2.1 Federal Regulations

Federal Highway Administration Standards

Code of Federal Regulations Title 23, Part 772 sets procedures for abatement of highway traffic noise and construction noise. Title 23 is implemented by the Federal Highway Administration. The purpose of this regulation is to provide procedures for noise studies and noise abatement measures to help protect the public health and welfare, to supply noise abatement criteria, and to establish requirements for information to be given to local officials for use in the planning and design of highways. All highway projects that are developed in conformance with this regulation shall be deemed to be in conformance with the Federal Highway Administration Noise Standards. Title 23 establishes 67 dBA as the worst-case hourly average noise level standard for impacts of federal highway projects on land uses, including residences, recreational uses, hotels, hospitals, and libraries (23 Code of Federal Regulations Chapter 1, Part 772, Section 772.19).

Federal Transit Administration Standards and Federal Railroad Administration Standards

Although the Federal Transit Administration (FTA) standards are intended for federally funded mass transit projects, the impact assessment procedures and criteria included in the FTA Transit Noise and Vibration Impact Assessment Manual (FTA 2018) are routinely used for projects proposed by local jurisdictions. The FTA and Federal Railroad Administration have published guidelines for assessing the impacts of ground-borne vibration associated with rail projects, which have been applied by other jurisdictions to other types of projects. **Table 3.11-2** shows the FTA groundborne vibration and noise impact criteria for human annoyance. With respect to human response within residential uses (i.e., annoyance, sleep disruption), FTA recommends a maximum acceptable vibration standard of 80 vibration velocity (VdB) for infrequent events.

In addition to the vibration annoyance standards presented in **Table 3.11-3**, the FTA also applies the following standards for construction vibration damage. As shown in Table 3.11-3, structural damage is possible for typical residential construction when the peak particle velocity (PPV) exceeds 0.2 inch per second (in/sec). This criterion is the threshold at which there is a risk of damage to normal dwellings.

Table 3.11-2. Groundborne Vibration and Noise Impact Criteria (Human Annoyance)

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

Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.
Notes: (1)"Frequent Events" are defined as more than 70 vibration events per day. Most rapid transit projects fall into this category.
(2)"Occasional Events" are defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
(3)"Infrequent Events" are defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
(4)This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
(5)Vibration-sensitive equipment is not sensitive to groundborne noise.

Table 3.11-3. Groundborne Vibration Impact Criteria (Structural Damage)

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

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.
Note: RMS = Root Mean Square (RMS) velocity calculated from vibration level (VdB) using the reference of one microinch/second.

3.11.2.2 State Regulations

California Noise Control Act of 1973

Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act, finds that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare.

California Noise Insulation Standards

In 1974 the California Commission on Housing and Community Development adopted noise insulation standards for multi-family residential buildings (Title 24, Part 2, California Code of Regulations [CCR]). Title 24 establishes standards for interior room noise (attributable to outside noise sources). Title 24 requires that multi-family dwellings, hotels, and motels located where the CNEL exceeds 60 dBA require an acoustical analysis showing that the proposed design will limit interior noise to less than 45 dBA CNEL for all residential spaces. Worst-case noise levels, with existing or future, must be used. The City of Escondido (City) has adopted the CCR Title 24 regulations for all types of residential dwellings.

3.11.2.3 Local Regulations

City of Escondido General Plan

The existing City General Plan Community Protection Element establishes noise and land use compatibility standards, and outlines goals and policies to achieve these standards. New projects in the city are required to meet the Noise Compatibility Guidelines listed in **Table 3.11-4** to determine the compatibility of land uses when evaluating proposed development projects (Noise Policy E1.1). A land use located in an area identified as "normally acceptable" indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can conduct outdoor activities with minimal noise interference. Land uses that fall into the "conditionally acceptable" noise environment should prepare an acoustical study that considers the type of noise source, the sensitivity of the noise receptor, and the degree to which the noise source has the potential to interfere with sleep, speech, or other activities characteristic of the land use. For land uses where the exterior noise level falls within the "conditionally unacceptable" range, new construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made with noise insulation features included in the design. For land uses where the exterior noise levels fall within the "clearly unacceptable" range, new construction generally should not be undertaken. The Community Protection Element also states that the exterior standard should not normally be applied to balconies or patios associated with residential uses. Impacts would be significant if the project would expose new development to noise levels in excess of the Noise Compatibility Standards.

The Community Protection Element also establishes standards for permanent increases in ambient noise levels at noise sensitive land uses. Noise impacts of proposed projects on existing land uses should be evaluated in terms of potential for adverse community response, based on a significant increase in existing noise levels. For example, if an area currently is below the maximum normally acceptable level, an increase in noise up to the maximum should not necessarily be allowed. Projects increasing noise levels by 5 dB or greater should be considered as generating a significant impact and should require mitigation.

Table 3.11-4 Land Use Compatibility Standards

Land Use Category	CNEL 55	60	65	70	75	80	85
Residential – Single Family, Duplex, Mobile Home							
Residential – Multi-Family, Residential Mixed Use							
Transient Lodging, Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Home							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial, Professional							
Industrial, Manufacturing, Utilities, Agriculture							

	Normally Acceptable	Specified land use is satisfactory, based upon the assumption that buildings involved are of normal conventional construction, without any special noise insulation requirements.
	Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will usually suffice.
	Normally Unacceptable	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with noise insulation features included in the design.
	Clearly Unacceptable	New construction or development should generally not be undertaken.

Source: City of Escondido 2012.

Noise Policy 5.2 establishes an exterior noise compatibility standard of 65 CNEL for multi-family housing as a goal where outdoor use is a major consideration (back yards and single-family housing developments, and recreation areas in multifamily housing developments); however, it recognizes that such levels may not necessarily be achievable in all residential areas.

Noise Policy 5.4 requires noise attenuation when interior noise in a new noise sensitive land use may exceed 45-dBA CNEL. Noise sensitive land uses include residential, daycare facilities, schools, churches, transient lodging, hotels, motels, hospitals, health care facilities, and libraries.

Noise Policy 5.5 requires construction projects and new development to ensure acceptable vibration levels at nearby vibration-sensitive uses based on FTA criteria. The Community Protection Element establishes criteria for acceptable vibration levels, consistent with the vibration criteria established by the FTA in the Transit Noise Impact and Vibration Assessment. The General Plan EIR states that the category of infrequent events is applicable to construction activities. The FTA Noise Impact and Vibration Assessment stipulates an impact criterion for ground-borne vibration of 0.3 in/sec PPV at engineered concrete and masonry structures and 0.2 in/sec PPV at non-engineered timber and masonry buildings. It also stipulates an impact criterion for ground-borne vibration at residences or buildings where people normally sleep of 80 VdB for infrequent events and 75 VdB for occasional events.

Noise Policy 5.6 requires the preparation of noise studies, as deemed necessary by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14.

Noise Policy 5.7 encourages use of site and building design, noise barriers, and construction methods as outlined in Figure VI-15 to minimize impacts on and from new development.

Noise Policy 5.8 requires development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

City of Escondido Municipal Code Noise Ordinance

The City's Municipal Code Chapter 17, Article 12, Noise Abatement and Control (Noise Ordinance) establishes prohibitions for disturbing, excessive or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens. Table 3.11-5 shows the allowable noise levels at any point on or beyond the boundaries of the property on which the sound is produced, and corresponding times of day for each zoning designation. The noise standards apply to each property or portion of property substantially used for a particular type of land use reasonably similar to the land use types shown in Table 3.11-5. Where two or more dissimilar land uses occur on a single property, the more restrictive noise limits apply.

Environmental noise is measured by the Leq for the hours as specified in Table 3.11-5. If the noise is continuous, the Leq for any hour will be represented by any lesser time period within that hour. Noise measurements of a few minutes only will thus suffice to define the noise level. If the noise is intermittent, the Leq for any hour may be represented by a time period typical of the operating cycle, but the measurement period must be 15 minutes or longer. If the measured ambient level exceeds the permissible noise level, the allowable noise exposure standard is the ambient noise level. Noise restrictions are listed in Sections 17-230 through 17-241 of the Noise Ordinance, such as specific regulations pertaining to motor vehicles and burglar alarms.

Table 3.11-5. City of Escondido Exterior Sound Limit Levels

Zone	Time	Applicable Limit One-hour Average Sound Level (A-weighted Decibels)
Residential Zones	7:00 AM and 10:00 PM	50
	10:00 PM and 7:00 AM	45
Multi-Residential Zones	7:00 AM and 10:00 PM	55
	10:00 PM and 7:00 AM	50
Commercial Zones	7:00 AM and 10:00 PM	60
	10:00 PM and 7:00 AM	55
Light Industrial/ Industrial Park Zones	Anytime	70
General Industrial Zones	Anytime	75

Source: City of Escondido Municipal Code Section 17-229, Sound Level Limits.

Additional sections of the Noise Ordinance applicable to this analysis are listed below.

Section 17-229 (c)(5) of the Noise Ordinance, Corrections to Exterior Noise Level Limits

Section 17-229 (c)(5) of the Noise Ordinance, Corrections to Exterior Noise Level Limits, includes the following regulations:

a. If the noise is continuous, the Leq for any hour will be represented by any lesser time period within that hour. Noise measurements of a few minutes only will thus suffice to define the noise level.

b. If the noise is intermittent, the Leq for any hour may be represented by a time period typical of the operating cycle. Measurement should be made of a representative number of noisy/quiet periods. A measurement period of not less than 15 minutes is, however, strongly recommended when dealing with intermittent noise.

c. In the event the alleged offensive noise, as judged by the enforcement officer, contains a steady, audible sound such as a whine, screech or hum, or contains a repetitive impulsive noise such as hammering or riveting, the standard limits set forth in Table 3.11-5, City of Escondido Exterior Sound Limit Levels, shall be reduced by 10 dB or to the ambient noise level when such noises are not occurring.

d. If the measured ambient level exceeds that permissible in Table 3.11-5, City of Escondido Exterior Sound Limit Levels, the allowable noise exposure standard shall be the ambient noise level. The ambient level shall be measured when the alleged noise violations source is not operating.

e. The sound level limit at a location on a boundary between two land use classifications is the limit applicable to the receiving land use; provided, however, that the one-hour average sound level limit applicable to extractive industries including, but not limited to, borrow pits and mines, shall be 75 dB at the property line regardless of the zone where the extractive industry is actually located.

f. Fixed-location public utility distribution or transmission facilities located on or adjacent to a property line shall be subject to the noise level limits of this section, measured at or beyond six feet from the boundary of the easement upon which the equipment is located.

Section 17-234 (Construction Equipment)

Except for emergency work, the following applies to all construction equipment operating in the city:

a. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of 7:00 AM and 6:00 PM and on Saturdays between the hours of 9:00 AM and 5:00 PM, and provided that the operation of such construction equipment complies with the requirements of subsection (d) of this section.

b. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the President, Governor or City Council as public holidays.

c. A person may operate construction equipment at his/her residence or for the purpose of constructing or modifying a residence for himself/herself on Monday through Friday of a week between the hours of 7:00 AM and 6:00 PM, and on Saturdays, Sundays, and holidays between the hours of 9:00 AM and 5:00 PM; provided, that such operation of construction equipment is not carried on for profit or livelihood and complies with the requirements of subsection (d) of this section.

d. No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of 75 dB at any time, unless a variance has been obtained in advance from the City Manager.

e. Persons engaged in construction for profit or as a business shall post signs at conspicuous places on a construction site, indicating hours of work as prescribed by this article or authorized by permit and the applicable noise level limit.

Section 17-237 (Landscape Equipment)

It shall be unlawful for any person, including the City of Escondido, to use any motorized landscape equipment, including but not limited to power blowers and vacuums, which causes a disturbing, excessive or offensive noise as defined under Section 17-227(k) of the Noise Ordinance. Disturbing, excessing or offensive noise refers to any sound or noise exceeding the noise standards in the Noise Ordinance (see Table 3.11-5).

Section 17-238 (Grading)

a. It shall be unlawful for any person, including the City of Escondido, to do any authorized grading at any construction site, except on Mondays through Fridays during a week between the hours of 7:00 AM and 6:00 PM and, provided a variance has been obtained in advance from the City Manager, on Saturdays from 10:00 AM to 5:00 PM.

b. For the purpose of this section, "grading" shall include, but not be limited to, compacting, drilling, rock crushing or splitting, bulldozing, clearing, dredging, digging, filling and blasting.

c. In addition, any equipment used for grading shall not be operated so as to cause noise in excess of a one-hour sound level limit of 75 dB at any time when measured at or within the

property lines of any property that is developed and used in whole or in part for residential purposes, unless a variance has been obtained in advance from the City Manager.

Section 17-240 (General Noise Regulations)

Section 17-240 includes additional general noise regulations. This section states that it is unlawful for any person to make, continue or cause to be made or continued, any disturbing, excessive or offensive noise that causes discomfort or annoyance to reasonable persons of normal sensitivity. Noises declared to be disturbing, excessive and offensive include stereo equipment, animal noise, and loading and unloading of vehicles that disturbs neighboring receptors. This section also establishes the following requirements for pile driving activities: No person shall operate between the hours of 6:00 PM. and 7:00 AM on weekdays, or on Saturdays, Sundays, or any legal holidays, any pile driver, pneumatic hammer, derrick, or other similar appliance, the use of which is attended by loud or unusual noise, unless a variance has been obtained in advance from the City Manager.

City of Escondido Municipal Code Environmental Quality Regulations

The City's Municipal Code Environmental Quality Regulations in Chapter 33, Article 47 implement the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (guidelines) by applying the provisions and procedures contained in CEQA to development projects proposed within the city. Section (a)(2) pertains to noise impacts, specifically noise impacts related to the widening of Mobility and Infrastructure Element streets. According to this section, the following incremental noise increases are generally not considered significant:

a. Short- or long-term increases, regardless of the extent, that do not result in noise increases in excess of general plan standards,

b. Short- or long-term increases that result in a 3 dBA or less incremental increase in noise beyond the general plan's noise standards.

3.11.3 Thresholds of Significance

According to Appendix G of the State *California Environmental Quality Act (CEQA) Guidelines*, noise impacts are considered potentially significant if they cause:

- **Threshold #1:** Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excel of standards established in the location general plan or noise ordinance, or applicable standards of other agencies.
- **Threshold #2:** Generation of excessive groundborne vibration or groundborne noise levels.
- **Threshold # 3:** 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?

The term "substantial increase" is not defined by any responsible agency. Under ambient conditions, people generally do not perceive that noise has clearly changed until there is a 3 dBA difference. Therefore, a threshold of 3 dBA is commonly used to define "substantial increase," as it is noticeable to humans under typical ambient conditions. For this analysis, a direct roadway noise impact would be considered significant if the project increases noise levels for a noise sensitive land use by 3 dBA CNEL and increases noise levels above an unacceptable noise level per the City's General Plan in the area

adjacent to the roadway segment. Note the City's General Plan Community Protection Element identifies an increase of 5 dBA CNEL as significant. To be conservative, the noise assessment used a significance threshold of 3 dBA CNEL.

3.11.4 Project Impact Analysis

3.11.4.1 Temporary and/or Permanent Increase in Ambient Noise Levels

Threshold #1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excel of standards established in the location general plan or noise ordinance, or applicable standards of other agencies.

Temporary Increase in Ambient Noise Levels

Construction Noise

This section addresses the construction noise impacts associated with the project to determine if they would result in the exposure of persons to or generation of noise level in excess of applicable noise standards. Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment includes haul trucks, water trucks, graders, dozers, loaders and scrapers can reach relatively high levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours.

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

LDN used a point-source noise prediction model to calculate the expected construction noise impacts (LDN 2022). The essential model input data for these performance equations include the source levels of each type of equipment, relative source to receiver horizontal and vertical separations, the amount of time the equipment is operating in a given day, also referred to as the duty-cycle and any transmission loss from topography or barriers.

Based on empirical data and the amount of equipment needed, worst case noise impacts from this construction equipment would occur during the demolition and grading operations. In order to determine the worst-case scenario for the grading activities, all the equipment was placed in a common location, which is not physically possible. As can be seen in **Table 3.11-6,** even if all the equipment were placed together, the cumulative noise levels would be 80.1 dBA and would attenuate 5.1 dBA at a distance of 90-feet from the point source noise and would be at or below the 75 dBA threshold.

Table 3.11-6. Construction Noise Levels

Equipment Type	Quantity	Source @ 50 Feet (dBA)	Duty Cycle (Hours/Day)	Cumulative Noise Level @ 50 Feet (dBA)
Dozer – D8	1	72	8	72.0
Tractor/Backhoe	1	74	8	74.0
Loader/Grader	1	73	8	73.0
Water Truck	1	70	8	70.0
Paver/Blade	1	75	8	75.0
Cumulative Levels @ 50 Feet				80.1
Distance to Property Line (Feet)				90
Noise Reduction due to Distance				-5.1
Nearest Property Line Noise Level				**75.0**

Source: LDN Consulting 2022c.

Demolition Noise

To prepare the site for development, the existing residential structures and associated buildings on the site would be demolished and removed. Not all the equipment will operate continuously over an 8-hour period, The equipment will be utilized on an as-needed basis depending on the demolition activities that are required. As an example: a saw will be used to weaken some of the structural components of the structure and then an excavator would be utilized to demo that section of the structure. An excavator or a loader will then be used to place the debris into the haul trucks. Noise levels from the demolition activities can reach short-term peak noise levels in excess of 90 dBA but will decay rapidly. This is due to the fact that once the equipment knocks down a portion of the building, the debris needs to be removed, sorted and inspected. Based on empirical data gathered during the monitoring of a similar project, the worst-case hourly noise level was found to be up to 81 dBA Leq at an average distance of 25 feet for demolition activities (LDN 2012). At an average distance of 50 feet, the noise level from the demolition activities would be roughly 75 dBA. The average distance from the demolition activities is anticipated to vary between 100 feet and 200 feet from the adjacent property lines. Given this, the noise levels will comply with the average 75 dBA threshold at the property lines.

Blasting

The project also may require some blasting-related activities and materials blasted would be exported offsite and clean soils would be brought in to replace. Areas of the project site that require deeper cuts and where the native material is not easily rippable (graded) may require blasting and the use of a rock drill. The rock drill would be moved around the site on an as needed basis dependent upon the site characteristics. The use of a rock drill would occur independently of all other proposed equipment. The drilling and blasting activities would occur in one area then the grading equipment would relocate or remove the debris. To determine the worst-case noise levels from the drilling operations the noise level from the rock drill would be 85.0 dBA at 50 feet. Utilizing a 6 dBA reduction per doubling of distance, at

an average distance of 160 feet from any property line, the noise levels will comply with the 75 dBA standard as shown in **Table 3.11-7**.

Table 3.11-7. Construction Noise Levels from Rock Drilling

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

Source: LDN Consulting 2022c.

Rock drilling and blasting will occur on an as-needed basis on site. In the event that the rock drill is staged within 160 feet of any occupied noise sensitive land use, sound levels could exceed 75 dBA at property lines and this represents a **significant impact (Impact N-1)** and mitigation is required.

- **Impact N-1:** If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines.

Construction Conclusion

The proposed residential development would comply with local construction and grading noise regulations. Construction would only occur between the hours of 7:00 AM and 6:00 PM on Monday through Friday and between the hours of 9:00 AM and 5:00 PM on Saturdays. Grading would be similarly limited, except on Saturdays when it would be limited to between 10:00 AM and 5:00 PM.

The equipment would be spread out over the project site. Based upon the proposed site plan construction activities will average more than 90-feet away from the adjacent property lines. At average distances over 90-feet the construction activities are anticipated to not exceed the City's 75-dBA standard.

Rock drilling and blasting will occur on an as-needed basis on site. In the event that the rock drill is staged within 160 feet of any occupied noise sensitive land use, sound levels could exceed 75 dBA at property lines and this represents a significant impact and mitigation is required.

Permanent Increase in Ambient Noise Levels

Operational Noise

This section addresses the operational noise impacts associated with the project to determine if they would result in the exposure of persons to or generation of noise level in excess of applicable noise standards.

Heating Ventilation and Air Conditioning (HVAC)

Ground mechanical ventilation units will be installed at the proposed residential units. The project anticipates installing Carrier CA15NA (Series, 24-A) or equivalent HVAC units with a reference noise level of 71 dBA at 3-feet. The manufacturer's specifications and noise levels are provided in Attachment A of the Noise Study – Appendix L of this EIR. The HVAC units will cycle on and off throughout the day. Typically, HVAC units run for approximately 20 minutes each operating cycle to provide the necessary heating or cooling. It is anticipated that the HVAC units will operate twice in any given hour or run for 40 minutes in any given hour. Noise levels drop 3 decibels each time the duration of the source is reduced in half. Therefore, hourly HVAC noise level over a 40-minute period would be reduced approximately 2 decibels to 69 dBA based on operational time. To predict the property line noise level, a reference noise level of 69 dBA at 3-feet was used to represent the HVAC units.

The HVAC units are located a minimum of 30 feet from the property lines and are shielded by the proposed homes and perimeter fencing as shown in **Figure 3.11-2.**The solid fencing will be vinyl, ¾-inch or thicker consisting of solid panels on minimum 4x4-inch posts with no cracks or gaps through or below and all seams or cracks will be filled or caulked. The typical locations of the proposed HVAC units are also shown in Figure 3.11-2. Two HVAC units may be located near each other with the proposed buildings separating them and would create the worst-case cumulative noise level. The remainder of the units are separated by at least 30 feet and the proposed buildings shielding them. This separation of 30 feet would result in a 20 dBA difference between two separate HVAC units and would not cumulatively increase the noise levels. Therefore, the worst-case combined noise from the HVAC would occur from two units.

Fixed or point sources radiate outward uniformly as sound travels away from the source. Their sound levels attenuate or drop off at a rate of six dBA for each doubling of distance. For example, a noise level of 75 dBA measured at three feet from the noise source to the receptor would be reduced to 69 dBA at six feet from the source to the receptor and 63 dBA at a distance of 12 feet.

Utilizing a six dBA decrease per doubling of distance, noise levels at the nearest property line as described above were calculated for the HVAC units. The noise levels associated with the HVAC units will be limited with the proposed perimeter fencing that will shield them both visually and acoustically. The HVAC units are located a minimum of 30 feet from the nearest property lines. To determine the noise level reductions from the perimeter fencing, the Fresnel Barrier Reduction Calculations based on distance, source height, receiver elevation and the top of barrier were modeled. The adjacent receptor was located 5 feet behind the perimeter fencing. The noise level reductions due to distance and the fencing for the nearest property line is provided in **Table 3-11-8**.

No impacts are anticipated at the property lines with the incorporation of the proposed six-foot fencing as shown in Figure 3.11-2. All other property lines are located further from the proposed HVAC units and the resulting noise levels would also be below the City's nighttime 45 dBA threshold. Therefore, noise generated by proposed HVAC units would be less than significant.

Table 3.11-8. Project HVAC Noise Levels (Nearest Property Line)

Distance to Observer (Feet)	Reference Noise Level (dBA)	Noise Source Reference Distance (Feet)	Noise Reduction Due to Distance (dBA)	Quantity	Noise Reduction from Fencing (dBA)	Resultant Noise Level @ Property Line (dBA)
35	69	3	-24.4	2	-8.6	42.1(1)

Source: LDN Consulting 2022c.
Note: Complies with the nighttime Noise Standard of 45 dBA.

Future Onsite Transportation Related Noise Levels

To determine the future noise environment and impact potential resulting from increased traffic associated with the proposed project, the Federal Highway Administration (FHWA) Model was utilized. The FHWA Model uses the traffic volume, vehicle mix, speed, and roadway geometry to compute the equivalent noise level. The peak hour traffic volumes range between 6-12% of the average daily traffic (ADT) and ten percent is generally acceptable for noise modeling.

Table 3-11-9 presents the roadway parameters used in the analysis including the peak traffic volumes, vehicle speeds and the hourly traffic flow distribution (vehicle mix). The vehicle mix provides the hourly distribution percentages of automobile, medium trucks and heavy trucks for input into the model. The buildout conditions are provided by LOS Engineering, Inc. (LOS Engineering 2022). The modeled receptor locations are represented in **Figure 3.11-3.**

Table 3.11-9. Future Traffic Parameters

Roadway	Average Daily Traffic (ADT)(1)	Peak Hour Volumes1	Modeled Speeds (MPH)	Vehicle Mix %(2)		
				Auto	Medium Trucks	Heavy Trucks
North Iris Lane	9,995	1,000	65	95.5	2.1	2.4

Source: LDN Consulting 2022c.
Notes: LOS Engineering 2022.
City of Escondido General Plan Project Buildout Noise Contours for Year 2035

A spreadsheet calculation was used to compute equivalent noise levels for each of the time periods used in the calculation of CNEL. Weighting these equivalent noise levels and summing them gives the CNEL for the traffic projections. The results of the specific noise modeling are provided in **Tables 3.11-10.** Additionally, three decibels of attenuation are allowed for the first row of buildings when they block 40 to 65% of the line of sight to the noise source, and three to five decibels of attenuation is allowed when the buildings obstruct more than 65% of the line of sight (Caltrans 2020).

Table 3.11-10. Future Exterior Noise Levels (Ground Level)

Receptor Number	Receptor Location	Noise Level @ Receptor (dBA CNEL)	Reduction Due to Shielding(1) (dBA CNEL)	Resultant Noise Level (dBA CNEL)
1	Building 20	65	-	65
2	Building 18	65	-	65
3	Building 17	65	-	65
4	Building 13	65	-	65
5	Building 12	65	-	65
6	Park/Outdoor Area	62	-3.0	59
7	Park/Outdoor Area	58	-3.0	55

Source: LDN Consulting 2022c.
Note: (1) Shielding is from the proposed residential buildings

Outdoor usable space would be provided by the proposed park/outdoor use areas located near Building 2 and Building 19. The line of sight to the roadways from the park/outdoor use areas are blocked by the existing and proposed structures by more than 40%, therefore a factor of 3 dBA was taken into account. It was determined that noise levels would be 65 dBA CNEL or less at each of the modeled receptor locations. The outdoor noise levels are expected to be as high as 59 dBA CNEL at the park/outdoor use area and would comply with the City's 65 dBA CNEL noise standard. Therefore, future exterior noise levels would comply with City standards and would be **less than significant**.

As shown in Table 3.11-10, noise levels at the facades of Buildings 20, 18, 17, 13, and 12 along North Iris Lane measured above 60 dBA CNEL, which means interior noise levels could exceed the City's established interior noise limit of 45 dBA CNEL, per Title 24. To ensure compliance with the CCR Title 24 interior noise threshold of 45 dBA CNEL, a final noise assessment shall be performed prior to the issuance of building permits. This final report shall identify the interior noise requirements based on architectural and building plans to meet the City's established interior noise limit. The identified interior noise requirements, which may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane. Compliance with this requirement of Title 24 will ensure potential impacts are less than significant.

Project Related Offsite Transportation Noise

Off-site project related roadway segment noise levels were calculated using the methods in the Highway Noise Model published by the FHWA (FHWA 1978). The FHWA Model uses the traffic volume, vehicle mix, speed, and roadway geometry to compute the equivalent noise level.

Because mobile/traffic noise levels are calculated on a logarithmic scale, a doubling of the traffic noise or acoustical energy results in a noise level increase of 3 dBA. Therefore, the doubling of the traffic volume, without changing the vehicle speeds or mix ratio, results in a noise increase of 3 dBA. Mobile noise levels radiate in an almost oblique fashion from the source and drop off at a rate of 3 dBA for each doubling of distance under hard site conditions and at a rate of 4.5 dBA for soft site conditions.

Hard site conditions consist of concrete, asphalt and hard pack dirt while soft site conditions exist in areas having slight grade changes, landscaped areas and vegetation. Hard site conditions, to be conservative, were used to develop the noise contours and analyze noise impacts along all roadway segments. The future traffic noise model utilizes a typical, conservative vehicle mix of 96% Autos, 2% Medium Trucks and 2% Heavy Trucks for all analyzed roadway segments. The vehicle mix provides the hourly distribution percentages of automobile, medium trucks and heavy trucks for input into the FHWA Model.

Community noise level changes greater than 3 dBA are often identified as audible and considered potentially significant, while changes less than 1 dBA will not be discernible to local residents. In the range of 1 to 3 dBA, residents who are very sensitive to noise may perceive a slight change. There is no scientific evidence available to support the use of 3 dBA as the significance threshold. Community noise exposures are typically over a long time period rather than the immediate comparison made in a laboratory situation. Therefore, the level at which changes in community noise levels become discernible is likely greater than 1 dBA and 3 dBA appears to be appropriate for most people. For the purposes for this analysis a direct and cumulative roadway noise impact would be considered significant if the project increases noise levels for a noise sensitive land use by 3 dBA CNEL and if the project increases noise levels above an unacceptable noise level per the City's General Plan in the area adjacent to the roadway segment. Note the City's General Plan Community Protection Element identifies an increase of 5 dBA CNEL as significant. To be conservative, the noise assessment used a significance threshold of 3 dBA CNEL.

Direct Impacts

To determine if direct off-site noise level increases associated with the development of the project will create noise impacts, the noise levels for the existing conditions were compared with the noise level increase from the project. Utilizing the project's traffic assessment (LOS Engineering 2022), noise contours were developed for the following traffic scenarios:

Existing: Current day noise conditions without construction of the project.

Existing Plus Project: Current day noise conditions plus the completion of the project.

Existing vs. Existing Plus Project: Comparison of the direct project related noise level increases in the vicinity of the project site.

The noise levels and reference distances to the 60 dBA CNEL contours for the roadways in the vicinity of the project site are given in Table 3.11-11 for the Existing Scenario and in Table 3.11-12 for the Existing Plus Project Scenario. Note that the values given do not take into account the effect of any noise barriers or topography that may affect ambient noise levels. Table 3.11-13 presents the comparison of the Existing Year with and without project related noise levels. The overall roadway segment noise levels will increase from 0.1 to 0.4 dBA CNEL with the development of the project. The project does not create a direct noise increase of more than 3 dBA CNEL on any roadway segment. Therefore, the project's direct contributions to off-site roadway noise increases would be less than significant to any existing or future noise sensitive land uses. The project's contributions to cumulative off-site roadway noise increases are discussed below in Section 3.11.5.

Table 3.11-11. Existing Noise Levels

Roadway	Roadway Segment	Average Daily Traffic (ADT)(1)	Vehicle Speeds (MPH)1	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Centre City Parkway	North Iris Lane to El Norte Parkway	17,018	55	73.6	402
North Iris Lane	Village Road to Robin Hill Lane	8,466	35	66.2	129
	Robin Hill Lane to Centre City Parkway	8,996	35	66.4	134

Source: LDN Consulting 2022c.
Note: (1) LOS Engineering 2022.

Table 3.11-12. Existing + Project Noise Levels

Roadway	Roadway Segment	Average Daily Traffic (ADT)(1)	Vehicle Speeds (MPH)(1)	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Centre City Parkway	North Iris Lane to El Norte Parkway	17,614	55	73.7	411
North Iris Lane	Village Road To Robin Hill Lane	8,775	35	66.3	132
	Robin Hill Lane to Centre City Parkway	9,791	35	66.8	142

Source: LDN Consulting 2022c.
Note: (1) LOS Engineering 2022.

Table 3.11-13. Existing vs. Existing + Project Noise Levels

Roadway	Roadway Segment	Existing Noise Level @ 50 Feet (dBA CNEL)	Existing Plus Project Noise Level @ 50 Feet (dBA CNEL)	Project Related Noise Level Increase (dBA CNEL)
Centre City Parkway	North Iris Lane to El Norte Parkway	73.6	73.7	0.1
North Iris Lane	Village Road To Robin Hill Lane	66.2	66.3	0.1
	Robin Hill Lane to Centre City Parkway	66.4	66.8	0.4

Source: LDN Consulting 2022c.

3.11.4.2 Excessive Ground-Borne Vibration

Threshold #2: Generation of excessive groundborne vibration or groundborne noise levels.

Proposed construction activities include demolition, grading, building construction, and paving. Blasting may also be required during grading operations due to the granitic area within portions of the site. These construction activities may result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and construction activities taking place. As required by the City's Municipal Code, construction of the residential development would only occur between the hours of 7:00 AM and 6:00 PM on Monday through Friday and between the hours of 9:00 AM and 5:00 PM on Saturdays, and thus would comply with local standards and regulations. As such, construction activities that produce vibration would only take place during hours with limited potential to cause annoyance or sleep disruption.

Caltrans guidelines state, "In most cases, vibration induced by typical construction equipment does not result in adverse effects on people or structures. Noise from the equipment typically overshadows any meaningful ground vibration effects on people. Some equipment, however, including vibratory rollers and crack-and-seat equipment, can create high vibration levels" (California Department of Transportation 2020).

The nearest vibration-sensitive uses to the project site are the residences located 100 feet or more from the proposed construction. The FTA has determined the vibration levels that would cause annoyance to a substantial number of people and potential damage to building structures. The FTA criterion for infrequent vibration induced annoyance is 80 vibration velocity in decibels (VdB) for residential uses. The FTA criterion for vibration induced structural damage is 0.2 in/sec PPV.

Construction Equipment

Construction of the proposed residential development is not anticipated to include activities known to cause significant vibration impacts such as pile driving or blasting. Table 3.11-14 lists the average vibration levels that would be experienced at the nearest vibration sensitive uses (residences located 100 feet or more from construction) from temporary construction activities. As shown, project-related construction activities would result in PPV levels below the FTA's criteria for vibration-induced structural damage. Therefore, construction activities would not result in vibration-induced structural damage to residential buildings near the construction areas. Additionally, construction activities would generate levels of vibration that would not exceed the FTA criteria for nuisance for nearby residential uses. Therefore, vibration impacts from construction equipment would be less than significant.

Table 3.11-14. Vibration Levels from Construction Activities (Residential Receptors)

Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate RMS Velocity at 25 Feet (in/sec)	Approximate Velocity Level at 100 Feet (VdB)	Approximate RMS Velocity at 100 Feet (in/sec)
Small Bulldozer	58	0.003	68.9	0.0111
Jackhammer	79	0.035	60.9	0.0044
Loaded Trucks	86	0.076	67.9	0.0095
Large Bulldozer	87	0.089	39.9	0.0004

Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate RMS Velocity at 25 Feet (in/sec)	Approximate Velocity Level at 100 Feet (VdB)	Approximate RMS Velocity at 100 Feet (in/sec)
		FTA Criteria	80	0.2
		Significant Impact?	**No**	**No**

Source: LDN Consulting 2022c.

3.11.4.3 Excessive Noise Levels Due to Project Vicinity to Airport

Threshold # 3: 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?

The closest airports to the project site are the Ramona Airport and McClellan-Palomar Airport, both of which are located more than two miles away. The Ramona Airport is located approximately 13 miles southeast of the project site and the McClellan-Palomar Airport is approximately 11 miles west of the site. The project site is not located within the Airport Influence Area of these airports (San Diego Regional Airport Authority 2011a and 2011b). Therefore, people residing or working in the project area would not be exposed to excessive noise levels and **no impact** is identified.

3.11.5 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for noise is limited to areas surrounding noise-generating sources, such as roadways or industrial uses, because noise impacts are localized.

Temporary and/or Permanent Increase in Ambient Noise Levels

Construction noise impacts are localized in nature because they are limited to the construction site where construction equipment is operating. As shown in Table 3.11-6, even if all the equipment were placed together, the cumulative noise levels would be 80.1 dBA and would attenuate 5.1 dBA at a distance of 90-feet from the point source noise and would be at or below the 75 dBA threshold. Future projects and the project would be subject to the City of Escondido construction noise ordinance, which limits construction noise to 75 dBA at the nearest residence. Compliance with the construction noise ordinance would ensure that a significant impact would not occur. Therefore, the project's contributions to cumulative temporary noise increases related to construction would be **less than significant**.

Noise is a localized phenomenon and is progressively reduced as the distance from the source increases; specifically, noise levels from stationary noise sources decrease by approximately 6 dB for every doubling of distance. Therefore, the geographic limit that would be considered for the noise cumulative analysis would include only those projects in proximity to the proposed project site. No approved, planned, or foreseeable projects in the area of the project site would introduce a new stationary source noise to the area. The proposed project would not generate excessive noise levels. Therefore, the proposed project, in combination with other cumulative projects, would not generate excessive noise levels. A significant cumulative impact would not occur.

Buildout of the residential development, along with future cumulative growth in Escondido, would result in increases in traffic that would cumulatively increase traffic noise. To determine if cumulative

off-site noise level increases associated with the development of the project and other planned or permitted projects in the vicinity will create noise impacts. The noise levels for the near-term project buildout and other planned and permitted projects were compared with the existing conditions. Utilizing the project's traffic assessment (LOS Engineering 2022), noise contours were developed for the following traffic scenarios:

> Existing: Current day noise conditions without construction of the project.
>
> Existing Plus Cumulative Projects Plus Project (Near Term): Current day noise conditions plus the completion of the project and the completion of other permitted, planned projects or approved ambient growth factors.
>
> Existing vs. Existing Plus Cumulative Plus Project: Comparison of the existing noise levels and the related noise level increases from the combination of the project and all other planned or permitted projects in the vicinity of the site.

The existing noise levels and reference distances to the 60 dBA CNEL contours for the roadways in the vicinity of the project site are given in Table 3.11-10 above for the existing scenario. The near-term cumulative noise conditions are provided in **Table 3.11-15.** No noise barriers or topography that may affect noise levels were incorporated in the calculations.

Table 3.11-16 presents the comparison of the Existing Year and the Near Term Cumulative noise levels. The overall roadway segment noise levels will increase 0.1 to 0.4 dBA CNEL with the development of the project and proposed cumulative projects. The cumulative noise increase is less than 3 dBA CNEL on any roadway segment. Therefore, the project's contributions to cumulative off-site roadway noise increases would be **less than significant**

Excessive Groundborne Vibration

Similar to noise effects, vibration is a localized phenomenon and is progressively reduced as the distance from the source increases. Therefore, the area of projects considered for the vibration cumulative analysis were those projects that would be close to the proposed project site.

No approved, planned, or foreseeable projects adjacent to the proposed project site would generate similar vibration. Therefore, vibration generated by construction on the proposed project site and other sites would not combine to generate cumulative vibration impacts. Once constructed, the proposed land use would not generate a significant source of vibration during normal operation. Therefore, cumulative vibration impacts would be **less than significant.**

Excessive Noise Levels Due to Project Vicinity to Airport

The project site is not located within two miles of a public or private airport. Therefore, people residing or working in the project area would not be exposed to excessive noise levels and **no impact** is identified.

Table 3.11-15. Existing + Project + Cumulative Noise Levels

Roadway	Roadway Segment	Average Daily Traffic (ADT)[1]	Vehicle Speeds (MPH)[1]	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Centre City Parkway	Iris Lane to El Norte Parkway	18,919	55	74.0	431
North Iris Lane	Village Road To Robin Hill Lane	8,787	35	66.3	132
	Robin Hill Lane to Centre City Parkway	9,803	35	66.8	142

Source: LDN Consulting 2022c.
Note: (1) LOS Engineering 2022.

Table 3.11-16. Existing VS. Existing + Project + Cumulative Noise Levels

Roadway	Roadway Segment	Existing Noise Level @ 50 Feet (dBA CNEL)	Existing Plus Project Noise Level @ 50 Feet (dBA CNEL)	Project Related Noise Level Increase (dBA CNEL)
Centre City Parkway	Iris Lane to El Norte Parkway	73.6	74.0	0.4
North Iris Lane	Village Road To Robin Hill Lane	66.2	66.3	0.1
	Robin Hill Lane to Centre City Parkway	66.4	66.8	0.4

Source: LDN Consulting 2022c.

3.11.6 Mitigation Measures

Implementation of the following mitigation measures would be required as a condition of project approval:

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

3.11.7 Conclusion

Temporary and/or Permanent Increase in Ambient Noise Levels

The proposed residential development would comply with local construction and grading noise regulations. Based on empirical data and the amount of equipment needed, worst case noise impacts from construction equipment would occur during the demolition and grading operations. In order to determine the worst-case scenario for the grading activities, all the equipment was placed in a common location, which is not physically possible. Even if all the equipment were placed together, the cumulative noise levels would be 80.1 dBA and would attenuate 5.1 dBA at a distance of 90-feet from the point source noise and would be at or below the 75 dBA threshold. Therefore, temporary increases in ambient noise levels during construction would be **less than significant.**

Additionally, at an average distance of 50 feet, the noise level from the demolition activities would be roughly 75 dBA. The average distance from the demolition activities is anticipated to vary between 100 feet and 200 feet from the adjacent property lines. Given this, the noise levels will comply with the average 75 dBA threshold at the property lines. Therefore, impacts from temporary construction noise would be **less than significant** and mitigation is not required.

Rock drilling and blasting will occur on an as-needed basis on site. In the event that the rock drill is staged within 160 feet of any occupied noise sensitive land use, sound levels could exceed 75 dBA at property lines. Implementation of mitigation measure MM-N-1, which will be required as a condition of project approval, will reduce the impact to below a level of significance.

No impacts from HVAC equipment are anticipated at the property lines with the incorporation of the proposed six-foot fencing. All other property lines are located further from the proposed HVAC units and the resulting noise levels would also be below the City's nighttime 45 dBA threshold. The proposed residential development would not result in new sources of noise that would expose surrounding land uses to noise levels in excess of the standards identified in the City's noise ordinance. Therefore, nuisance noise from the proposed residences would be **less than significant.**

Noise levels from North Iris Lane would not exceed the City's 65 dBA CNEL exterior noise standard. However, since noise levels at the facades of Buildings 20, 18, 17, 13, and 12 along North Iris Lane measured above 60 dBA CNEL, interior noise levels could exceed the City's established interior noise limit of 45 dBA CNEL, per Title 24. To ensure compliance with the CCR Title 24 interior noise threshold of 45 dBA CNEL, a final noise assessment shall be performed prior to the issuance of building permits. This final report shall identify the interior noise requirements based on architectural and building plans to meet the City's established interior noise limit. The identified interior noise requirements, which may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane. Compliance with this requirement of Title 24 will ensure potential impacts are less than significant.

Implementation of the proposed project would not exceed the applicable incremental noise impact standard on any roadway. Therefore, the project would result in a **less than significant** traffic noise impact.

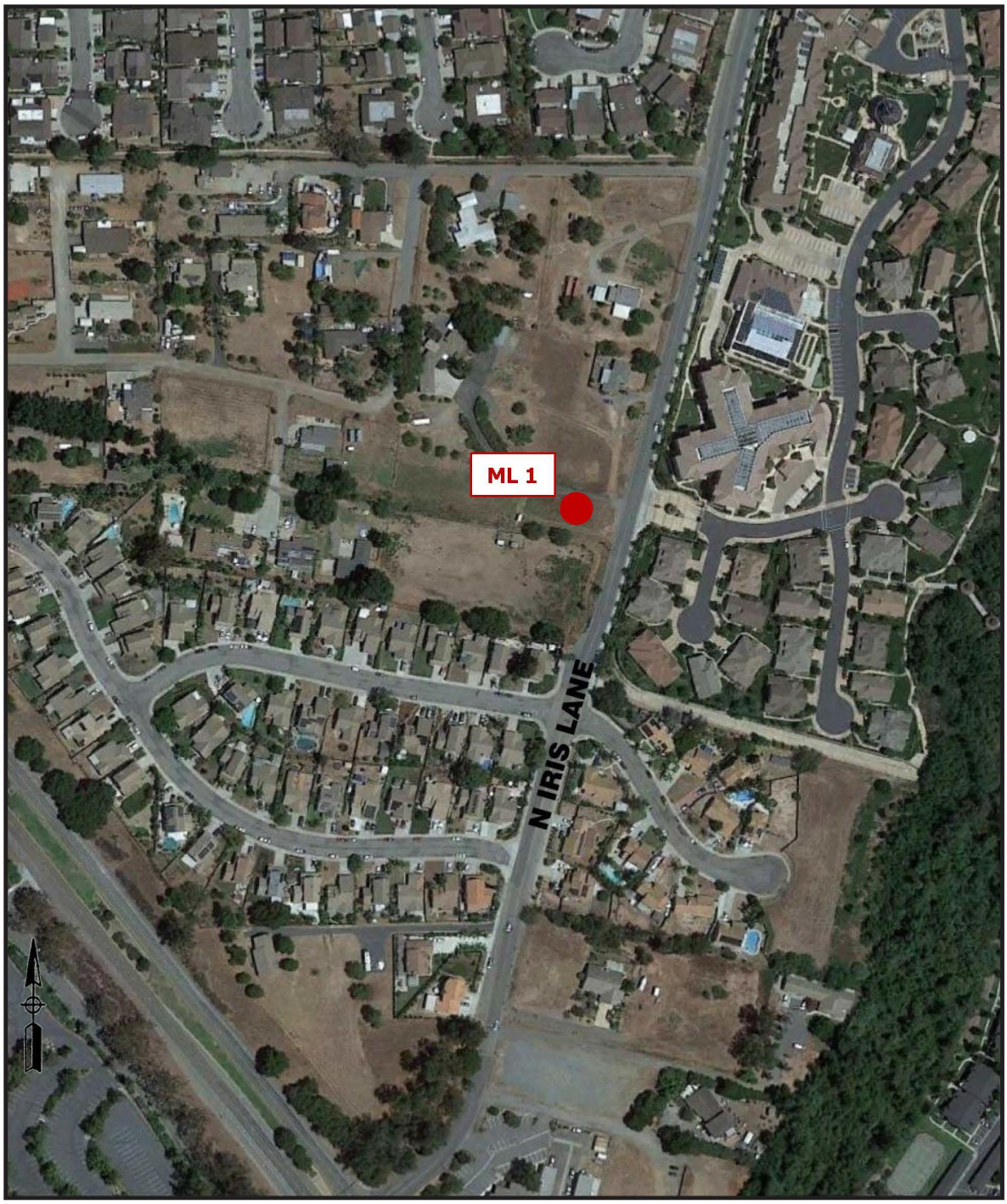
Excessive Groundborne Vibration

Construction of the proposed residential development is not anticipated to include activities known to cause significant vibration impacts such as pile driving or blasting. As shown in Table 3.11-14 the average vibration levels that would be experienced at the nearest vibration sensitive uses from temporary construction activities would result in PPV levels below the FTA's criteria for vibration-induced structural damage. Additionally, construction activities would generate levels of vibration that would not exceed the FTA criteria for nuisance for nearby residential uses. Therefore, vibration impacts from construction equipment would be **less than significant**.

Excessive Noise Levels Due to Project Vicinity to Airport

The closest airports to the project site are the Ramona and McClellan-Palomar Airports, which are located more than ten miles away from the project site. The project site is not located within the Airport Influence Area of these airports (San Diego Regional Airport Authority 2011a and 2011b). Therefore, people residing or working in the project area would not be exposed to excessive noise levels and **no impact** would occur.

Figure 3.11-1. Ambient Noise Monitoring Location

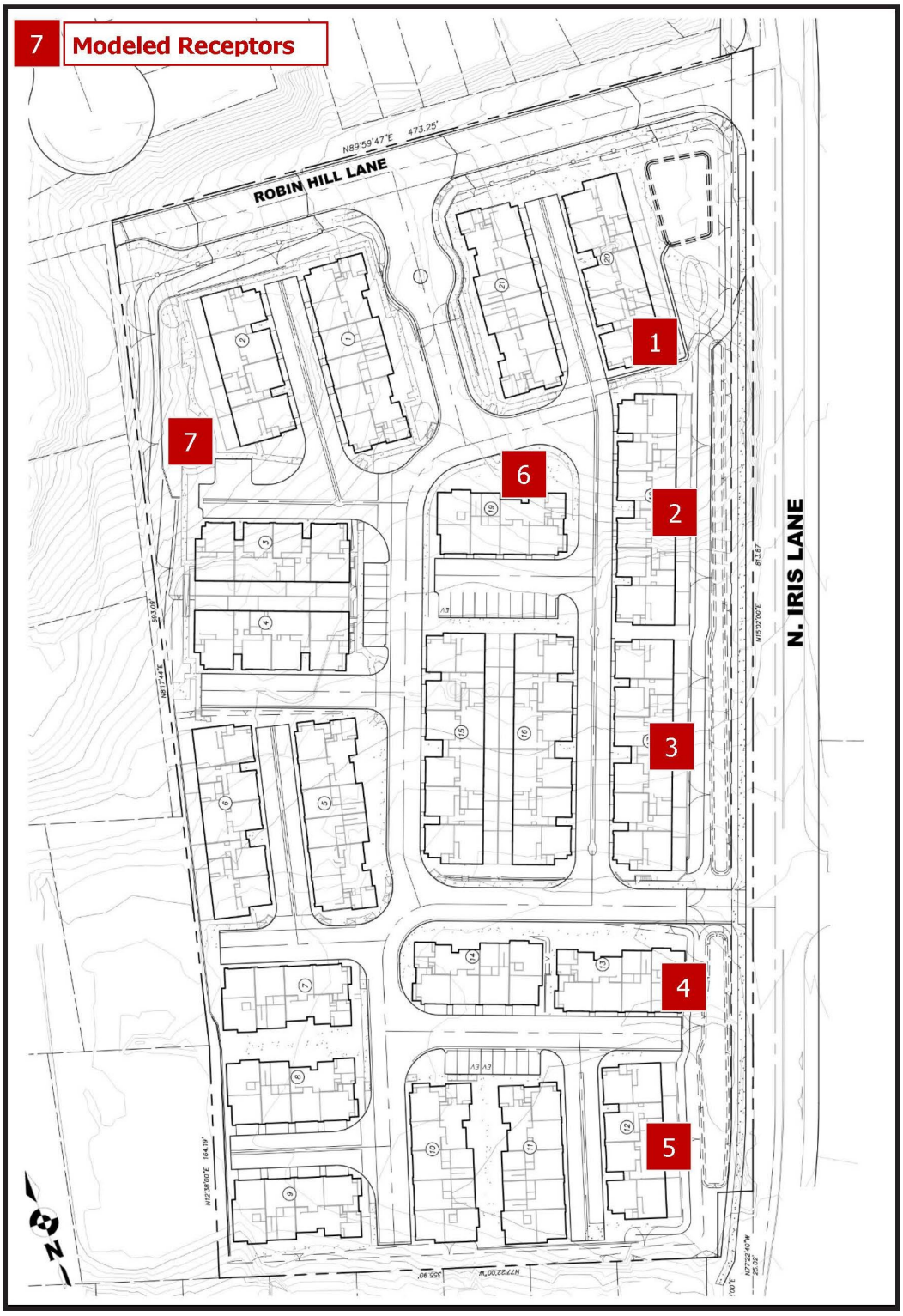


Source: LDN 2022c.

Figure 3.11-2. Locations of Proposed HVAC Units

Source: LDN 2022c.

Figure 3.11-3. Modeled Receptor Locations



Source: LDN 2022c.

3.12 Population and Housing

This section analyzes the potential for impacts related to population and housing resulting from development of the proposed project. This section considers population and housing characteristics in the area and discusses project consistency with regional growth projections. The analysis also considers the California Environmental Quality Act (CEQA) Guidelines Appendix G and applicable State and Local regulations, including the City of Escondido General Plan.

3.12.1 Existing Conditions

This section provides background information regarding population and housing forecasts for the City of Escondido based upon demographic information from the San Diego Association of Governments (SANDAG).

Population

According to the City of Escondido demographic information, the total population as of 2018 was 151,115 (City of Escondido 2018). Based on growth projections provided by the Series 14: Regional Growth Forecast prepared by SANDAG, it is estimated that the City's population growth will reach 165,127 by 2025, 169,922 by 2035, and 174,398 persons by 2050 (SANDAG 2021).

Housing

In 2020, the City of Escondido had 49,211 housing units. The housing stock is comprised of approximately 56.6 percent single-family units, 35.6 percent multi-family units, and 7.7% mobile homes (City of Escondido 2022). Based on the Series 14: Regional Growth Forecast, the city is expected to have 54,910 housing units by 2025, 58,990 units by 2035 and 60,618 units by 2050 (SANDAG 2021).

3.12.2 Regulatory Framework

This section describes the local regulatory setting as it relates to population and housing for the proposed project.

3.12.2.1 State Regulations

California Planning and Zoning Law

The legal framework within which California counties and cities exercise local planning and land use functions is provided in the California Planning and Zoning Law (Sections 65000 through 66499.58 of the California Government Code). Under that law, each county and city must adopt a comprehensive, long-term general plan. The law gives counties and cities wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. The requirements include seven mandatory elements described in the Government Code. Each element must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and implementation measures.

Once the general plan of a county or city is adopted, it should be construed as a dynamic document, for which adaptability is a key component. Each jurisdiction frequently reviews its general plan for consistency and to ensure it addresses growth-related issues in a comprehensive manner. State law

allows up to four general plan amendments per general plan element per year, so each jurisdiction can make changes as justified.

California Building Standards Code

In 2001, California consolidated the Uniform Building, Plumbing, Electrical, and Mechanical codes into the California Building Standards Code, which is contained in Title 24 of the California Code of Regulations. The California Building Standards Code contains 11 parts: Electrical Code, Plumbing Code, Administrative Code, Mechanical Code, Energy Code, Residential Building Code, Historical Building Code, Fire Code, Existing Building Code, Green Building Standards Code, and the Reference Standards Code. These codes promote public health and safety and ensure that safe and decent housing is constructed in the city.

Senate Bill 375

Senate Bill 375 (codified in the Government Code and Public Resources Code), took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established in Assembly Bill 32. Senate Bill 375 requires metropolitan planning organizations to incorporate a Sustainable Communities Strategy (SCS) in their Regional Transportation Plans (RTPs) that will achieve GHG emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.

Regional Housing Needs Assessment

A Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.

3.12.2.2 Regional and Local Regulations

San Diego Association of Governments

SANDAG is a public agency, composed of 18 cities and the County of San Diego, which builds strategic plans guiding the San Diego region in land use, growth, economics, and the environment. SANDAG also provides population and housing estimates for the region, which are based, in part, on local jurisdictional planning data and inform regional planning.

The SANDAG Regional Comprehensive Plan, adopted in 2004, provides a long-term planning framework for the San Diego region. The Regional Comprehensive Plan identified smart growth and sustainable development as important strategies to direct the region's future growth toward compact, mixed-use development in urbanized communities that already have existing and planned infrastructure, and then connecting those communities with a variety of transportation choices.

In 2011, SANDAG approved the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included a sustainable communities strategy, consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the California Air Resources Board (CARB) as required by the 2008 Sustainable Communities and Climate Protection Act. In 2010, CARB established targets for each region in California governed by a metropolitan planning organization. SANDAG is the metropolitan planning organization for the San Diego region.

San Diego Forward: The Regional Plan

SANDAG is required by law to update its regional transportation plan every 4 years. In October 2015, SANDAG adopted an update to its RTP/SCS. SANDAG's 2015 RTP/SCS, known as San Diego Forward: The Regional Plan (Regional Plan), integrates the elements of the prior Regional Comprehensive Plan and combines those elements with the Regional Plan. SANDAG recently adopted the 2021 Regional Plan (December 2021).

The Regional Plan updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the County. SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan, and other local General Plans of cities, may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. The General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG's RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years.

Regional Growth Forecast

SANDAG estimates future population, housing, land use, and economic growth throughout San Diego County and its comprising cities, including the City of Escondido. In December 2021, SANDAG adopted the 2021 Regional Plan, which includes the Series 14: Regional Growth Forecast. SANDAG growth projections for the region and for the City of Escondido are outlined in Table 3.12-2.

The City of Escondido is expected to experience a slightly higher growth rate for population and housing, and a lower employment growth rate when compared to the entire region of San Diego. It should also be noted that the 2050 Regional Growth Forecast is not intended to be an exact formula utilized to determine growth in the region and comprising jurisdictions; rather it should be utilized as a starting point for regional planning.

Table 3.12-2. Forecasted Growth for the San Diego Region and the City of Escondido

Jurisdiction	Year				Change 2016-2050	
	2016	2025	2035	2050	Numeric	Percent
Population						
San Diego Regional	3,309,510	3,470,848	3,620,348	3,746,073	436,563	13.2%
City of Escondido	150,978	165,127	169,922	174,398	23,420	15.5%
Housing						
San Diego Regional	1,190,555	1,288,216	1,409,866	1,471,299	280,744	23.6%
City of Escondido	48,462	54,910	58,990	60,618	12,156	25.1%
Employment						
San Diego Regional	1,646,419	1,761,747	1,921,475	2,086,318	439,899	26.7%
City of Escondido	58,323	60,758	64,686	68,924	10,601	18.2%

Source: SANDAG 2021.

Regional Housing Needs Assessment

Based on a methodology that weighs a number of factors (i.e., projected population growth, employment, commute patterns, and available sites), SANDAG determined quantifiable needs for housing units in the region according to various income categories. In its final Regional Housing Needs Assessment (RHNA) figures, SANDAG allocated 9,607 housing units to the Escondido area for the 2021– 2029 Housing Element Cycle (SANDAG 2020). Per the City of Escondido 2021-2029 Housing Element, overall, the City has the ability to accommodate at least 9,463 units on vacant and underutilized sites across the City. Of that total, 8,127 units are located in zones that allow at least 30 dwelling unit per acre (du/ac), indicating that they may accommodate lower-income units. Additionally, 5,821 of these high-density units are located on sites or on adjacent sites with cumulative areas between 0.5 and 10 acres, indicating that they may be counted toward the lower income capacity. While these sites meet the criteria for lower-income households, the City is assuming that 2,051 above-moderate units and 3,770 lower-income units could be accommodated on these high-density, correctly sized sites. With the adoption of expected Specific Plans currently under review, the City would have adequate residential capacity available to meet the City's RHNA for all income groups. **Table 3.12-3** summarizes the City's RHNA status.

Table 3.12-3 City of Escondido Summary of RHNA Status

Site Category	Above Moderate	Moderate	Low	Very Low	Total
Units on Identified Sites	3,439	1,467	0	4,557	9,463
Approved and Under Construction Projects	1,357	90	155	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020

Site Category	Above Moderate	Moderate	Low	Very Low	Total
Accessory Dwelling Units	86	147	56	71	360
Total Identified Capacity	**5,531**	**1,704**	**582**	**4,628**	**12,445**
RHNA Allocation	4,967	1,527	1,249	1,864	9,607

Source: City of Escondido Housing Element April 2022.

City of Escondido General Plan Housing Element

The City of Escondido Draft 2021-2029 Housing Element was recommended for approval by the Planning Commission in July 2021 and approved by the City Council in August 2021. The City received public comment letters on the draft housing element and overall process, prior to the City Council initial adoption of the document on August 11, 2021. City staff reviewed received comment letters, including those submitted from the San Diego Housing Federation, Escondido Community Housing Coalition, Sierra Club North County Group, and Erik Felix and Laura Harper, as well as from California Department of Housing and Community Development (HCD). After the August 2021 City Council adoption, City staff met with each group listed to discuss how their comments may be integrated into the revised housing element document. Meetings with each group occurred between January and February of 2022. On April 15, 2022, the City posted the revised adopted Housing Element for a 30-day review period, prior to resubmittal to HCD. City staff presented the draft changes in a public meeting on May 10, 2022 to the City's Planning Commission and general public. The applicable goals and policies pertaining to population and housing are below.

Housing Goal 1: Plan for quality, managed, and sustainable growth

Housing Policy 1.1: Expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.

Housing Policy 1.2: Housing projects shall fund all or a portion of public facilities and costs for providing municipal services directly related to the need created by the development. The amount must be proportional to the cost of the service or improvement to offset the impacts to public facilities, services, and operations.

Housing Policy 1.4: Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.

Housing Policy 1.5: Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.

Housing Policy 1.6: Encourage creative residential developments and partnerships that result in desirable amenities and contribute to infrastructure needs.

Housing Policy 1.7: Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed-Use Overlay areas.

Housing Policy 1.9: Improve affordability by promoting sustainable housing practices that incorporate 'whole system' approach to siting, designing, and constructing housing that is integrated into the

building site, consumes less water and improves water quality, reduces the use of energy and other resources, and minimizes its impact on the surrounding environment.

Housing Goal 2: Provide a range of housing opportunities for all income groups and households with special needs

Housing Policy 2.1: Plan for adequate development potential to accommodate the regional share of housing for all income groups and promote equal access to resources and amenities.

Housing Policy 2.2: Encourage new development to provide a range of housing by type, size, location, price, and tenure to provide a greater array of housing types.

3.12.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to recreation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to population and housing would occur if the project would:

- **Threshold #1:** Induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure).
- **Threshold #2:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.12.4 Project Impact Analysis

3.12.4.1 Induce Population Growth

Threshold #1: Induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure).

Increases in population, housing, and employment are generally considered to be social or economic effects, as opposed to physical effects, which are the focus of CEQA analysis. There are circumstances where social and economic changes could indirectly cause physical environmental impacts or result in changes to environmental resources, such as air quality, traffic, or noise levels. In other situations, lead agencies may evaluate social or economic change related to a physical change in determining whether the physical change is significant (*CEQA Guidelines* Section 15131).

The approximately 7.7-acre project site is located within the County of San Diego jurisdiction and requires annexation/reorganization from the County into the City of Escondido. The intensity of development would be less than the maximum allowed under the County's General Plan. The site is currently designated as Village Residential (VR-24) which allows up to 24 du/acre or 184 units on the site. Within the Escondido General Plan, the site is identified as Suburban (S) with a density of 3.3 du/acre, which would allow up to 23 single family residences on the site. The project includes a General Plan Amendment to re-designate the project site from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18/du/acre) with the final density to be 13.2 du/acre. The City has anticipated residential on the project site; however, the proposed number of units would be 79 units greater than what is identified in the City's General Plan. The project would act as an infill project with the existing residential development surrounding the proposed project.

Construction of the proposed project would represent a temporary increase in construction employment. Given the relatively common nature and scale of the construction associated with the proposed project, the demand for construction employment would likely be met within the existing and future labor market in the City and North County San Diego area. The size of the construction workforce would vary during the different stages of construction, but it is not expected that a substantial quantity of workers from outside the local area would relocate permanently.

The proposed project would directly induce growth through the development of 102 multi-family residential dwelling units. According to the City's demographic information, there is an average of 3.13 persons per household in Escondido (City of Escondido 2018). Using this number, and assuming a net increase of 98 units on the project site (there are four existing residences), the project would increase the City's existing population of 151,115 (City of Escondido 2018) by about 307 persons, to approximately 151,422, or by 0.2%. This population increase would be very small and would not be likely to adversely affect the City or its services.

The SANDAG population growth forecasts rely, in part, on individual jurisdiction's planning documents, such as the County's and City's General Plan. Since the site would be developed at a lower intensity than allowed under the County's General Plan, the increase in population would be less than what SANDAG anticipated. As shown in Table 3.12-2 above, the City's population is projected to grow from 150,978 people in 2016 to 174,398 people by 2050 (an increase of 23,420 people). The population increase of 307 people would account for 1.3% of SANDAG's projected population growth.

The proposed project would not indirectly induce a growth in population as no extension of infrastructure is proposed beyond what is required to adequately serve the proposed project. The project will connect to existing utilities within North Iris Lane including water, sewer, electricity and telecommunication services, and natural gas, should the project decide to use natural gas. Additionally, the majority of the surrounding area is already developed.

Therefore, the proposed project would not directly or indirectly induce growth beyond current estimates and forecasts. Impacts would be **less than significant**.

3.12.4.2 Displace Housing and People Necessitating Replacement Housing

Threshold #2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

There are four existing residences on the project site. Implementation of the proposed project would include demolition of those four houses. Based on the population rate of 3.13 persons per dwelling unit, 13 people may occupy the existing four residential units. This would not be considered a substantial number of existing housing or people. Furthermore, the project would replace those four houses with 102 multi-family units. The environmental effects from constructing those 102 units have been analyzed throughout this EIR in sections 3.1 through 3.16. Since there would be a net increase of 98 units, impacts related to displacing housing or people would be **less than significant.**

3.12.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in

an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect.

Induce Population Growth

As discussed above, the proposed project would introduce an estimated 307 people resulting from the development of 102 residential units. Based upon regional projections, comparisons to current land use designations, and comparison with the RHNA planning periods, the introduction of the estimated 307 people would not be considered substantial and were included in regional growth projections. Impacts would be less than significant.

The cumulative projects listed in Table 2-2 would either directly or indirectly induce population growth. Projects that include residential development may increase population in the City similar to the proposed project. These cumulative projects include various residential and mixed-use development projects listed in Table 2-2, including mixed uses with single-family residential, multi-family and assisted living residences. In addition, commercial development is proposed or approved, which can indirectly lead to population growth in the City and surrounding areas. The introduction of a new population is not, in and of itself, a significant impact. Per SANDAG growth projections the City is expected to grow by 15.5% in population and 25.1% in housing units. Population and housing generated by the cumulative projects would be included in those growth projections or would not substantially increase growth.

Further, the project would not result in the removal of a barrier of growth that would reasonably result in the intensification or development of land. All utility and infrastructure improvements would be sized to only adequately serve the proposed project (see Section 3.17, Utilities and Service Systems). Additionally, because the project is surrounded by existing development, it is unlikely that the approval and construction of the project would lead to an intensification of the land uses in the immediate vicinity of the site. Therefore, a cumulative impact would not occur.

Displace Housing and People Necessitating Replacement Housing

The project would not displace a substantial amount of housing or people necessitating construction of replacement housing elsewhere. Because there would be a net increase of 98 units, the project would not contribute to a cumulative impact.

3.12.6 Mitigation Measures

Based upon the analysis presented in Sections 3.12.4 and 3.12.5, no significant impacts related to population and housing were identified; thus, no mitigation is required.

3.12.7 Conclusion

Induce Population Growth

Construction of the proposed project would represent a temporary increase in construction employment. Given the relatively common nature and scale of the construction associated with the proposed project, the demand for construction employment would likely be met within the existing and future labor market in the City and North County San Diego area. The size of the construction workforce would vary during the different stages of construction, but a substantial quantity of workers from outside the local area would not be expected to relocate permanently. Impacts would be less than significant.

As discussed above, the proposed project would introduce an estimated 307 people resulting from the development of 102 multi-family residential units. Based upon regional projections, comparisons to current land use designations, and comparison with the RHNA planning periods, the introduction of the estimated 307 people would not be considered substantial nor would it exceed regional growth projections. Impacts would be less than significant.

Displace Housing and People Necessitating Replacement Housing

There are four existing residences on the project site. Implementation of the proposed project would include demolition of those four houses. Based on the population rate of 3.13 persons per dwelling unit, 13 people may occupy the existing four residential units. This would not be considered a substantial number of existing housing or people. Furthermore, the project would replace those four houses with 102 multi-family units. The environmental effects from constructing those 102 units have been analyzed throughout this EIR. Since there would be a net increase of 98 units, impacts related to displacing housing or people would be **less than significant.**

3.13 Public Services

This section analyzes the potential impact of the proposed project on public services including fire protection services, police protection services, schools, parks, and libraries. Please see Section 3.16, Utilities and Service Systems, for an analysis of water, wastewater, energy, telecommunications, stormwater, and solid waste services. The analysis also considers the California Environmental Quality Act (CEQA) Guidelines Appendix G and applicable State and Local regulations, including the City of Escondido General Plan.

3.13.1 Existing Conditions

This section details the existing service providers and resources related to fire protection, police protection, schools, parks, and libraries.

Fire Protection

The project site currently falls under the Rincon del Diablo Fire District (RDDFPD). Through service agreements, the Escondido Fire Department (EFD) responds to all fires, medical emergencies, vehicle accidents, hazardous material incidents and general hazardous conditions that occur within the portion of RDDFPD that is within the City's General Plan sphere of influence, including the project site. Once annexed into the city, the project site would fall completely under the EFD service area and the EFD would provide fire protection and emergency medical services to the project.

The EFD's central operations are co-located with the Police Department in the City's Police and Fire Headquarters located at 1163 North Centre City Parkway. There are seven fire stations in the city and their existing staffing resources are presented in **Table 3.13-1.** Fire station locations are presented in **Figure 3.13-1**. The closest fire station to the project site is Escondido Station No. 3 located at 1808 North Nutmeg Street.

Table 3.13-1. Escondido Fire Stations

Station	Staffing/Equipment
Fire Station No. 1 310 North Quince	Staffed 24/7 by ten personnel: one Battalion Chief, two Fire Captains, two Engineers, four Firefighter Paramedics and one Paramedic/EMT 1 Type 1 Fire Engine 1 Ladder Truck 1 Rescue Ambulance 1 Battalion Chief Command Unit
Fire Station No. 2 421 North Midway	Staffed 24/7 by five personnel: one Fire Captain, one Engineer, two Firefighter Paramedics and one Paramedic/EMT 1 Type 1 Fire Engine 1 Rescue Ambulance 1 Cross Staffed Type 3 Brush Engine
Fire Station No. 3 1808 Nutmeg Street	Staffed 24/7 by five personnel: one Fire Captain, one Engineer, two Firefighter Paramedics and one Paramedic/EMT 1 Type 1 Fire Engine 1 Rescue Ambulance 1 Cross Staffed Type 3 Brush Engine

Station	Staffing/Equipment
Fire Station No. 4 3301 Bear Valley Parkway	Staffed 24/7 by three personnel: one Fire Captain, one Engineer, one Firefighter Paramedic. 1 Type 1 Fire Engine 1 Cross Staffed Type 3 Brush Engine
Fire Station No. 5 2319 Felicita Road	Staffed 24/7 by five personnel: one Fire Captain, one Engineer, two Firefighter Paramedics and one Paramedic/EMT 1 Type 1 Fire Engine 1 Rescue Ambulance 1 Cross Staffed Type 6 Brush Patrol
Fire Station No. 6 1735 Del Dios Road	Staffed 24/7 by three personnel: one Fire Captain, one Engineer, one Firefighter Paramedic. 1 Type 1 Fire Engine 1 Cross Staffed Type 3 OES Brush Engine
Fire Station No. 7 at 1220 North Ash Street	Staffed 24/7 by three personnel: one Fire Captain, one Engineer, one Firefighter Paramedic. 1 Type 1 Fire Engine 1 Cross Staffed Type 3 OES Brush Engine

Source: Escondido Fire Department, 2022.

Police Protection

The project site currently falls under the San Diego County Sheriff jurisdiction. However, once annexed into the city, police protection services for the proposed project would be provided by the Escondido Police Department. As shown in Figure 3.13-1, the proposed project would be served by Escondido Police and Fire Headquarters located at 1162 North Center City Parkway, approximately 1.4 miles south of the project site. It provides operational and administrative space for the following functions: Police patrol, investigations, juvenile crime, domestic violence, community-oriented policing, communications and 911 emergency response services, crime lab, computer-aided dispatch center, emergency operations center, short-term custody of prisoners, and community meeting space.

Schools

The project site is located within the Escondido Union School District (EUSD) for elementary (grades K-5) and middle school (grades 6-8) and within the Escondido Union High School District (EUHSD) for high school. The EUSD District boundary covers the entire City and some areas within the surrounding unincorporated County. EUSD serves more than 17,000 students and operates 17 elementary schools, one intermediate school (4-8) and five middle schools. The EUHSD operates three comprehensive high schools and a continuation high school.

Schools that would serve the project include:

- North Broadway Elementary School, 2301 North Broadway
- Rincon Middle School, 925 Lehner Avenue
- Escondido High School, 1535 North Broadway

Parks

There are 28 parks and recreational facilities located throughout the city, including two urban parks, six neighborhood parks, 12 community parks, five open space parks, and three city owned open space (City of Escondido 2012b). The closest parks to the project site are Rod Mcleod Park and Jesmond Dean Park, both just under a mile away. Rod Mcleod Park is located approximately one mile southwest of the site at 1701 South Iris Lane. Amenities include BBQ area, picnic tables, playground/ tot lot and restrooms. Jesmond Dean Park is located approximately one mile north of the site at 2401 North Broadway. Amenities include ball fields, BBQ, fitness course, picnic tables, playground/ tot lot and restrooms.

Libraries

Founded in 1898, the Escondido Public Library Department serves the residents of Escondido with a Main Library, the Literacy Center, and the Pioneer Room all located at 239 South Kalmia Street. At over 54,000 square feet (sq. ft), the Main Library building houses a 6,000 square foot children's room, the Turrentine Room for events, a teen area, a Spanish section, and a computer lab and business center. The Literacy Center provides essential literacy services to the community by supporting adults as they build basic literacy skills that will lead to a better quality of life for them and their families. The Pioneer Room is the primary historical research center for the City of Escondido. The Pioneer Room identifies, collects, preserves, and provides access to records, manuscripts, and other significant resources of enduring historical, legal, administrative, and fiscal value.

3.13.2 Regulatory Framework

3.13.2.1 Regional/Local Regulations

City of Escondido General Plan

Applicable goals and policies related to the proposed project are listed below. Refer to Section 3.10, Land Use and Planning for an analysis of proposed project consistency with City General Plan Resource Element goals and policies.

Quality of Life Standards

In conjunction with the General Plan Goals, Quality of Life Standards have been developed to establish minimum thresholds of service levels for various public improvements and facilities. Quality of Life standards applicable to fire, police, schools, parks and libraries are included below:

Quality of Life Standard 2: Public Schools: The community shall have sufficient classroom space to meet state mandated space requirements and teacher/student ratios, with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.

Quality of Life Standard 3: Fire Service: In urbanized areas of the city, an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of ten (10) minutes for supporting companies shall be maintained. A minimum of seven (7) total fire stations each staffed with a PSU engine company shall be in place prior to General Plan build-out. For outlying areas beyond a five (5) minute travel time or further than three (3) miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief. Travel time is the elapsed time from a

verbal or computerized acknowledgment of the dispatch by the responding unit at the moment of departure from the station to its arrival at the scene. Response time is the elapsed time from receiving a call for service to the responding unit's arrival at the scene. In the case of single family residences "arrival at the scene" shall mean at the front door of the residence; for multi-family residences "arrival at the scene" shall mean at the street access to the involved building. The Fire Department intends to meet these times for no less than 90 percent of all emergency responses by engine companies.

Quality of Life Standard 4: Police Service: The city shall maintain personnel staffing levels based on community generated workloads and officer availability. Resources will be adjusted to maintain an initial response time for Priority 1 calls (crimes in progress or life threatening) of no more than five (5) minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life threatening incidents) of no more than six and one-half (6½) minutes. The Escondido Police standard includes the measurement of elapsed times from when the call is initially processed by the communication operator, the transfer of call information to the police officer, and the time of the field officer's arrival at the service call location. Resources will be allocated to organize patrol areas and to involve community members when appropriate to achieve Community Oriented Problem Solving (COPS) efforts. To the maximum economic extent feasible, the Police Department will take aggressive enforcement action against crime trends, including maintenance procedures and incorporating community involvement and education as a means to deter potential incidents.

Quality of Life Standard 6: Parks System: The city shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units. Urban recreational amenities such as exercise courses, urban trails, tree lined shaded walkways and plazas, etc. shall be focused in high intensity downtown and urban areas. Priority shall be given to acquiring land to expand Grape Day Park north of Woodward Avenue and developing neighborhood parks in urban areas with the greatest need. School playground areas may be included as park acreage, provided that neighborhood park amenities and facilities are accessible, approval is granted by the school district(s) and the facility is open to the public as determined by the City Council. Prior to build-out, the city shall provide a minimum of two (2) community centers. Other specialized recreation facilities shall be incorporated into the City's Master Plan for Parks, Trails and Open Space.

Quality of Life Standard 7: Library Service: The public library system shall maintain a stock and staffing of two (2) collection items per capita and three (3) public library staff per 8,000 residents of the City of Escondido. The city shall provide appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the city prior to buildout of the General Plan where feasible. The city shall continue to expand the role of technology in providing library services and resources to Escondido residents.

Growth Management Element

Quality of Life Threshold Goal 1: Quality, managed, and sustainable growth that maintains and provides adequate public facilities for existing and future development.

Quality of Life Threshold Policy 1.1: Use the General Plan quality of life thresholds (or refinements adopted by subsequent master plans, as appropriate) as the standard to assess the impact of new facility and service demands created by growth, and apply those standards, as appropriate when considering discretionary projects.

Public Facility Financing Policy 3.1: Maintain and periodically update development impact fees and major infrastructure financing programs to assure that all new and infill developments contribute their proportionate share of funding for necessary municipal infrastructure and public facilities.

Community Protection Element

Fire Protection Goal 2: Protection of life and property through adequate fire protection and emergency medical services.

Fire Protection Policy 2.2: Provide Fire Department response times for no less than 90 percent of all emergency responses with engine companies by achieving the following service standard: Provide an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Advanced Life Support (ALS) calls and a maximum response time of ten (10) minutes for supporting companies in urbanized areas of the city.

Fire Protection Policy 2.4: Require new residential and non-residential development to be constructed consistent with the California Fire Code and the requirements set by the State.

Fire Protection Policy 2.6: Require new development to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development.

Fire Protection Policy 2.7: Continue to include the Fire Department in the review of development proposals to ensure that projects adequately address safe design and on-site fire protection.

Fire Protection Policy 2.9: Require mid- and high-rise development to include sprinkler systems and on-site fire suppression equipment and materials, and be served by fire stations containing specialized equipment for fire and/or emergency incidents.

Fire Protection Policy 2.10: Establish and maintain an adequate fire flow in relation to structure, size, design, and requirements for construction and/or built-in fire protection.

Police Services Goal 3: Protection of life and property, and enforcement of law that enhances personal safety in the community.

Police Services Policy 3.2: Maintain an initial response time for Priority 1 calls of no more than five (5) minutes and an initial response time for Priority 2 calls of no more than six and one-half (6½) minutes. Constantly review these standards to ensure their adequacy and appropriateness in consideration of resource availability.

Police Services Policy 3.3: Maintain adequate levels of sworn officers and civilian personnel to support law enforcement operations based on community needs in order to meet response time standards.

Police Services Policy 3.5: Require new development to contribute fees to maintain police facilities and equipment that meet the needs of the community.

Community Health and Service Element

Parks and Recreation Goal 2: A complete system of park and recreational facilities and programs to serve all users.

Parks and Recreation Policy 2.3: Provide a minimum of 5.9 acres of developed active Neighborhood, Community, and Urban parks in addition to 5.9 acres of passive park land/open space for habitat preservation and additional recreational opportunities totaling 11.8 active and passive acres per

1,000 dwelling units. School playground areas can be included as park acreage if these facilities are approved by the school district(s) and open to the public as determined by the City Council.

Parks and Recreation Policy 2.4: Require new residential development to contribute fees to finance acquisition and development of park and recreational facilities in compliance with the standards stipulated by Parks and Recreation Policy 2.3. Allow credit for the on-site dedication of land or facilities to be used for public park purposes, consistent with city standards.

Parks and Recreation Policy 2.25: Require park or recreation facilities constructed as part of a private development and intended solely for use by its residents to be considered a private park.

Library Services Goal 3: An educated and informed citizenry through lifelong learning opportunities and dissemination of information.

Library Services Policy 3.2: Provide and maintain the following library facilities and services standards, where feasible: a) A floor area of 1.6 square feet of library facilities per dwelling unit or 0.6 square feet per capita of the City of Escondido; b) A ratio of three (3) public library staff per 8,000 residents or 2,300 dwelling units of the City of Escondido, including one librarian plus two paraprofessional staff within this staffing ratio; c) A ratio of total items in the Escondido library inventory of 2.0 items per capita of Escondido; and d) A ratio of one public access computer per 1,500 residents, or sufficient public access computers to meet an average wait time of no more than 15 minutes, whichever is less.

Schools and Education Goal 5: An educated and informed citizenry through quality education and lifelong learning opportunities.

Schools and Education Policy 5.2: Include school districts in review of residential development applications to determine if there will be changes in enrollment, and if these changes are consistent with districts' long-range master plans.

Escondido Public Facility Development Fee Ordinance

Article 18B of Chapter 6 of the Escondido Municipal Code establishes the public facility fees for the City of Escondido. This article requires that all new residential or nonresidential development pay a fee for the purpose of assuring that the public facility standards established by the City are met with respect to the additional needs created by such development. The amount of the applicable public facility fee due is determined by the fees then in effect and the number and type of dwelling units in a proposed residential development project and/or the number of square feet and type of nonresidential development as established by City Council resolution. The Public Facility Fees cover public facilities such as police, fire and library.

3.13.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts to public services. An impact would be considered significant if the proposed project would have any of the following consequences.

- **Threshold #1:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental

impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire protection
- Police protection
- Schools
- Parks

3.13.4 Project Impact Analysis

Threshold #1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection

The proposed project would receive fire protection services by the Escondido Fire Department. EFD is a full-service department with seven fire stations throughout the city. Per the City's General Plan, the EFD's response time standard is to respond to all priority Level One or Emergency type calls within 7 minutes and 30 seconds, 90 percent of the time. Response time is defined from the time a 911 call is answered at the Escondido Communications Center until an EFD unit arrives on scene (City of Escondido 2012a).

The proposed project would increase the demand on EFD resources as a result of the development of residential uses and the associated population increase. Additional residents on the project site would increase the need for fire protection services through routine fire and emergency medical calls. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/ property owner shall pay the Escondido Public Facility Development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for fire protection services.

The closest fire station to the project site is Escondido Station No. 3 located at 1808 North Nutmeg Street. Station No. 3 is approximately 1.6 miles to the secondary access and 1.8 miles to the primary access. The most remote unit would be approximately 1.98 miles from the fire station with a calculated travel time of just over 4 minutes. Therefore, with dispatch and turnout anticipated to be up to 2.5 minutes, EFD can respond to the Project site within the City's adopted performance goal of responding to emergency calls with a first-due unit within 7:30 minutes (5:00 minutes travel time), 90% of the time (DUDEK 2022).

Due to the project's proximity to Fire Station No. 3, as well as payment of public facility fees that go toward addressing the EFD's needs in equipment and staffing, the proposed project is not expected to impact response time or require construction of additional facilities.

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire

services. Impacts would be **less than significant.** Consistent with Article 18B of Chapter 6 of the Escondido Municipal Code, the Applicant shall provide payment of applicable public facilities fees. Additionally, all new projects in the City are required to annex into CFD 2020-1 (Citywide Services) or establish another lawful funding mechanism to offset costs associated with the provision of public services.

Police Protection

The proposed project would receive police protection services from the Escondido Police Department. Per General Plan Update Quality of Life Standard #4, EPD's response time standard is to respond to an initial response time for Priority 1 calls (crimes in progress or life threatening) of no more than five minutes and an initial response time for Priority 2 calls (serious calls requiring rapid response but not life threatening incidents) of no more than six and one-half minutes (City of Escondido 2012a).

The proposed project would increase the demand on EPD resources as a result of the development of residential uses and the associated population increase. Additional residents on the project site would likely increase the frequency of emergency and non-emergency calls to the EPD. As a condition of project approval, prior to the issuance of a grading permit, the applicant/developer/property owner shall pay the public facility development fees in effect at that time. These fees are required for all new development projects in the City to ensure that public facility standards established by the City are met. This would offset the project's increase in demand for police protection services.

As shown in Figure 3.13-1, the proposed project would be served by Escondido Police and Fire Headquarters located at 1162 North Center City Parkway, approximately 1.4 miles south of the project site. It provides operational and administrative space for the following functions: Police patrol, investigations, juvenile crime, domestic violence, community-oriented policing, communications and 911 emergency response services, crime lab, computer-aided dispatch center, emergency operations center, short-term custody of prisoners, and community meeting space. Due to the project's proximity to the Police and Fire Headquarters as well as payment of public facility fees that go toward addressing the EPD's needs in equipment and staffing, the proposed project would not significantly impact response time.

Thus, while the project would place increased demand on police protection services, it is not anticipated that the proposed project would result in the need for construction or expansion of existing police facilities. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. Impacts resulting from the proposed project would be **less than significant**. Consistent with Article 18B of Chapter 6 of the Escondido Municipal Code, the Applicant shall provide payment of applicable public facilities fees. Additionally, all new projects in the City are required to annex into CFD 2020-1 (Citywide Services) or establish another lawful funding mechanism to offset costs associated with the provision of public services.

Schools

Performance objectives for public school services are identified in the General Plan Update Quality of Life Standard #2, as follows: The community shall have sufficient classroom space to meet state-mandated space requirements and teacher/student ratios with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies

The project site is located within the service boundary of the Escondido Union School District (EUSD) for elementary (grades K-5) and middle school (grades 6-8) and within the Escondido Union High School District (EUHSD) for high school (grades 9-12). The following schools would serve the project:

- North Broadway Elementary School. 2301 North Broadway
- Rincon Middle School- 925 Lehner Ave
- Escondido High School- 1535 North Broadway

Table 3.13-2 summarizes the enrollment and capacity at each of these schools.

Table 3.13-2. Enrollment and Capacity by School

School	Grade Level	2020-21 Enrollment (1)	2018 Capacity (2)
North Broadway Elementary	K-5	537	670
Rincon Middle	6-8	944	1,155
Escondido High	9-12	2,111	2,379(3)

Source: (1) California Department of Education 2022.
(2) EUSD Facilities Master Plan 2020.
Note: (3) Capacity not available; however, there were 2,379 students enrolled in 2017-2018 school year.

Using the student generation rate for multifamily residential units provided in the School Facilities Needs Analysis (2018) of 0.2142 students per multi-family unit, the construction of 102 multifamily units on the project site would generate approximately 22 students (EUSD 2018). As shown in Table 3.13-2, there is sufficient capacity to accommodate these additional students. Furthermore, according to the capacity assessments in EUSD Facilities Master Plan, student enrollment is projected to decline overtime. For 2025, projected enrollment is anticipated to decline by 20% from 2018 enrollment numbers (EUSD 2020). Therefore, it is expected that there would be enough capacity in the schools to serve the students generated by the proposed project.

Additionally, the project applicant shall pay school mitigation fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. Payment of these fees would assist in funding EUSD's and EUHSD long-range plans. State Bill (SB) 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Such payment shall provide "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995(h)). As such, with contribution of required development fees, impacts to schools would be **less than significant**.

Parks

The General Plan Quality of Life Standard #6 states that the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. As of 2012, the city had 6,556 acres of parkland and open space (City of Escondido 2012a) and, as of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland per 1,000 units. Thus, the city has an existing surplus of park and open space land.

Implementation of the proposed project would include a net increase of 98 multi-family residential units, since there are four existing residences. Based on the population rate of 3.13 persons per dwelling unit, the proposed project would potentially add an estimated 307 residents to the city. To meet the General Plan Quality of Life Standard of 11.8 acres of parkland per 1,000 dwelling units, the addition of 98 residential units would require the provision of 1.16 acres of additional park and open space.

The project includes 64,247 square feet (s.f.) (1.48 acres) of common open space area with grades less than 10 percent including usable open space areas which encourage relaxation activities such as observing nature, bird watching, painting, photography, and picnicking as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas.

The proposed project also includes recreational areas totaling 11,359 s.f. (0.26 acre). This includes a tot lot and barbeque area in the northeast portion of the site and an outdoor workout area in the northwest portion of the site. There would also be dispersed seating and patio areas throughout the site. These areas would be maintained by the Homeowners Association. Therefore, the project would provide a combined total of approximately 1.74 acres of active and passive public open space. The project would also provide a total of 21,434 s.f. (0.49 acre) of outdoor private space. Additionally, consistent with to Article 18C, Chapter 6, of the City's Municipal Code, the Applicant shall pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development. All new projects in the City are required to annex into CFD 2020-1 (Citywide Services) or establish another lawful funding mechanism to offset costs associated with the provision of public services.

Therefore, the proposed project would exceed the 1.16 acres of park/open space area General Plan requirement. Demand for recreational services from development of the proposed project would further be offset through payment of the Escondido Public Facility Development Fee. Impacts would be **less than significant.**

Libraries

Library service in the city, including the project site, is provided by the Escondido Public Library Department through the Main Library and the Escondido Pioneer Room, as well as the Escondido Technology Center and Literacy Learning Center. The increase in demand for library services from development of the proposed project would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects. Impacts would be **less than significant.**

3.13.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to public services, the cumulative analysis is based upon a list approach to

determine the proposed project's contributing effect on potential cumulative impacts related to public services (see Table 2-2, Cumulative Projects).

Fire Protection Services

The geographic area for the cumulative analysis of fire protection and emergency services is those areas that are serviced by the EFD. The cumulative projects that fall within this geographic area would add to the increase in demand for fire protection and emergency services. As discussed in Section 3.13.4, above, although the proposed project would increase the demand for fire protection services, the project is not expected to cause a decline in EFD response times. Nonetheless, the cumulative projects listed in Table 2-2 would result in additional demand of fire protection services, and the potential need for additional fire protection resources. However, all cumulative projects would be required to pay City of Escondido Public Facility Development fees to offset the increase in demand caused by their respective project. Development fee payments would go towards providing the additional staff and equipment that would be needed by EFD in the future to provide fire protection services. Thus, cumulative impacts to fire protection services would be **less than significant.**

Police Protection Services

The geographic area for the cumulative analysis of police protection is those areas that are serviced by the Escondido Police Department. All cumulative projects listed in Table 2-2 would result in an increase in demand for police protection services from the EPD. As discussed in Section 3.13.4, although the proposed project would increase the demand for police protection services the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. Similar to the proposed project, the cumulative projects listed in Table 2-2 would result in additional demand of police protection services, and the potential need for additional police protection resources. All cumulative projects would be required to offset increased demand to police protection services through the payment of Public Facility Development fees. These fees would provide for additional staff and equipment to assist in the provision of law enforcement services. In order to offset any potential cumulative impacts to police protection services, the proposed project would also be required to contribute toward the future police protection resources through the payment of fees. As such, with payment of fees, cumulative impacts to police protection services would be **less than significant.**

Schools

The geographic area for the cumulative analysis of schools is those areas that are serviced by the Escondido Union School District and Escondido Union High School District. Development of the proposed project would generate additional students for the schools that would serve the project, including North Broadway Elementary, Rincon Middle, and Escondido High School. As discussed in Section 3.13-4, there would be sufficient capacity at these schools to accommodate the additional students. Recently approved projects in the city which have not yet been constructed and the cumulative projects included on Table 2-2 that have a residential component would also generate students that need to be accommodated by either EUSD or EUHSD.

As discussed, the project applicant would be required to contribute school mitigation fees, pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. All of the cumulative projects included in Table 2-2 that include residential development would result in increased demand for school services, and would be required to pay school fees to offset the increase demand, similar to the proposed

project. As such, with contribution of required development fees by the proposed project and related projects, cumulative impacts to schools would be **less than significant.**

Parks

The proposed project as well as the cumulative projects that are in the City (as identified in Table 2-2) would add to the cumulative demand for park and recreation facilities in the city. All residential projects that increase the demand for park and recreation needs in the city are required to provide park space and/or pay park in lieu-fees. The environmental documentation prepared for each project would analyze impacts associated with the construction of any parks within each overall development footprint. As discussed in Section 3.13.4, the proposed project would be required to pay the City's Public Facility Development fees, which is required for all projects that increase the demand for park and recreation needs in the city. The development fees would be used for developing neighborhood and regional parks and amenities. It is expected that all cumulative projects that increase demand for parks and recreation needs would also be required to pay these fees. As such, cumulative impacts on recreational facilities in the city would be **less than significant.**

Libraries

The proposed project along with cumulative projects within the service area of the Escondido Public Library would result in an increase in demand for library services. The increase in demand for library services from development of the proposed project and cumulative projects would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects. Therefore, cumulative impacts to library services would be **less than significant.**

3.13.6 Mitigation Measures

No significant impacts to public services were identified; thus, no mitigation measures are required.

3.13.7 Conclusion

Fire Protection

The closest fire station to the project site is Escondido Station No. 3 located at 1808 North Nutmeg Street, approximately 0.75 mile southwest of the project site. Although the proposed project would increase the demand for fire protection services, the project is not expected to cause a decline in EFD response times. Nonetheless, the project applicant would be required to pay City of Escondido Public Facility Development fees to offset the increase in demand for fire protection services. Development fee payments would go towards providing the additional staff and equipment that would be needed by EFD in the future to provide fire protection services. Therefore, due to the project's proximity to Fire Station No. 3 as well as payment of public facility fees that go toward addressing the EFD's needs in equipment and staffing, the proposed project is not expected to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire services. Impacts would be **less than significant.**

Police Protection Services

the proposed project would be served by Escondido Police and Fire Headquarters located at 1162 North Center City Parkway, approximately 1.4 miles south of the project site. Although the proposed

project would increase the demand for police protection services, the project is not expected to cause a decline in Escondido Police Department response times. Nonetheless, the project applicant would be required to pay City of Escondido Public Facility Development fees to offset the increase in demand for police protection services. Development fee payments would go towards providing the additional staff and equipment that would be needed by EPD in the future to provide police protection services. Thus, while the proposed project would place increased demand on police protection services, it is not anticipated that the proposed project would result in the need for construction or expansion of existing police facilities. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. Impacts resulting from the proposed project would be **less than significant**.

Schools

The project site is located within the service boundary of the Escondido Union School District for elementary (kindergarten through 5th Grade) and middle school (6th through 8th Grade) and within the Escondido Union High School District for high school. Development of the proposed project would generate additional students for the schools that would serve the project, including North Broadway Elementary, Rincon Middle, and Escondido High School. As shown in Table 3.13-2, there would be sufficient capacity at these schools to accommodate the additional students. The project applicant would be required to contribute school mitigation fees, pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. As such, with contribution of required development fees, impacts to schools would be **less than significant**.

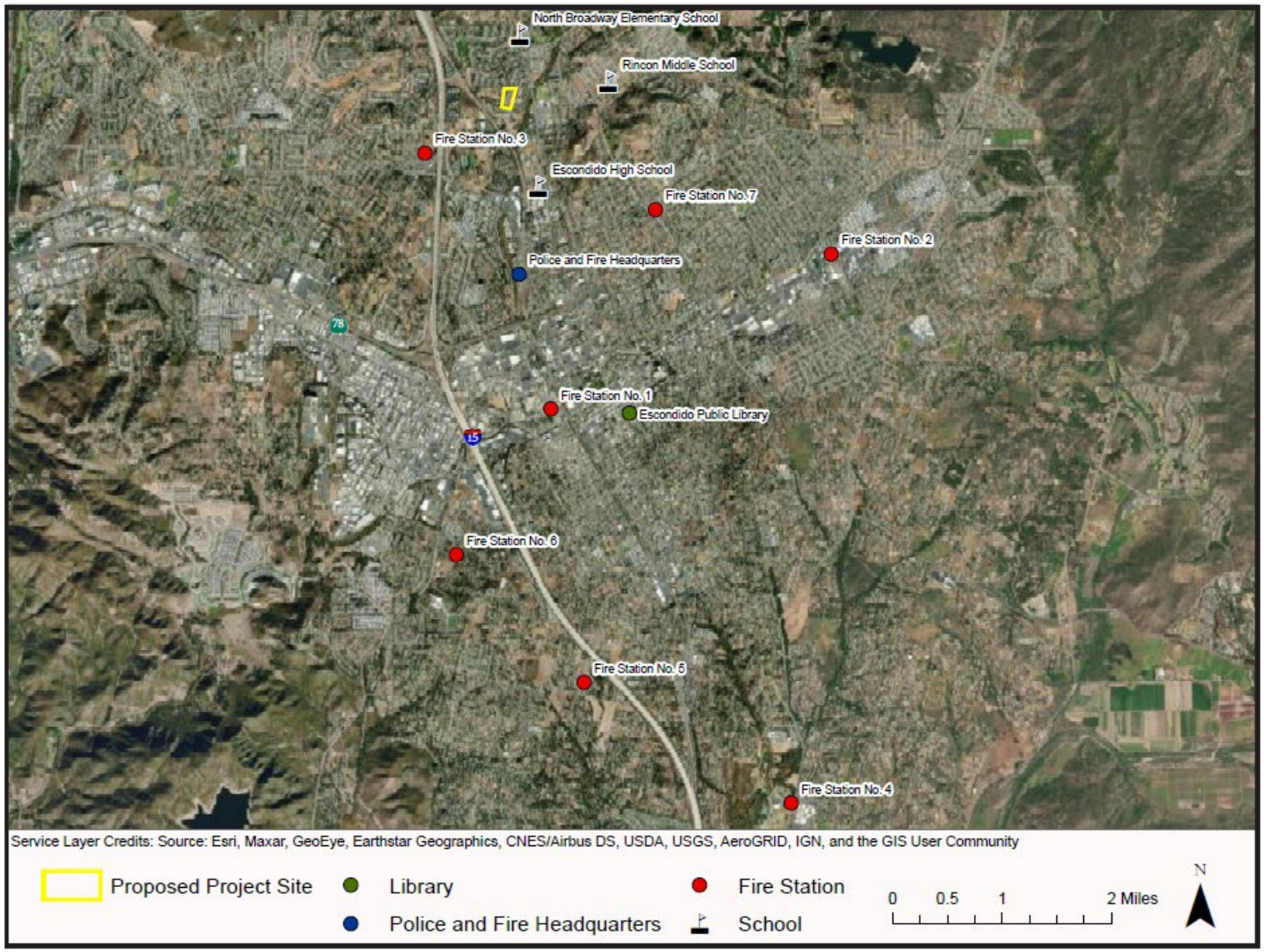
Parks

The proposed project would result in an increase in the City of Escondido population by approximately 307 residents. The additional residents would require approximately 1.16 acres of new park space to fulfill the City's General Plan Quality of Life Standard of 11.8 acres of parkland per 1,000 dwelling units. The proposed project would be required to pay the Escondido Public Facility Development Fee to go toward the acquisition and development of local and community park facilities throughout the city in addition to what is provided on-site. The project includes 75,606 s.f. (1.74 acres) of common useable open space including recreational areas and 21,434 s.f. (0.49 acres) of private open space. As such, with payment of the required development fees in combination with provision of on-site common and private open space, the project would meet and exceed the anticipated demand for neighborhood and regional parks or other recreational facilities. Impacts would be **less than significant.**

Libraries

Library service in the city, including the project site, is provided by the Escondido Public Library Department through the Main Library and the Escondido Pioneer Room, as well as the Escondido Technology Center and Literacy Learning Center. The increase in demand for library services from development of the proposed project would be offset through payment of the Escondido Public Facility Development Fee that would go toward Capital Improvement Project library projects. Impacts would be **less than significant.**

Figure 3.13-1. Public Facilities



3.14 Recreation

This section analyzes the potential impact of the proposed project on recreation. Please see Section 3.13, Public Services, for an analysis of parks. The analysis also considers the California Environmental Quality Act (CEQA) Guidelines Appendix G and applicable State and Local regulations, including the City of Escondido General Plan.

3.14.1 Existing Conditions

This section describes existing park, recreation facilities, and trails on the project site and in the project vicinity.

Parks and Recreation Facilities

There are 28 parks and recreational facilities located throughout the city, including two urban parks, six neighborhood parks, 12 community parks, five open space parks, and three city owned open space. (City of Escondido 2012b). The closest parks to the project site are Rod Mcleod Park and Jesmond Dean Park, both just under a mile away. Rod Mcleod Park is located approximately one mile southwest of the site at 1701 South Iris Lane. Amenities include BBQ area, picnic tables, playground/ tot lot and restrooms. Jesmond Dean Park is located approximately one mile north of the site at 2401 North Broadway. Amenities include ball fields, BBQ, fitness course, picnic tables, playground/ tot lot and restrooms.

3.14.2 Regulatory Framework

This section describes the state and local laws and regulations that are applicable to the proposed project.

3.14.2.1 State Regulations

Quimby Act

Since the passage of the 1975 Quimby Act (California Government Code Section 66477), cities and counties have been authorized to pass ordinances requiring that developers set aside land, donate conservation easements or pay fees for park improvements. Revenues generated by the Quimby Act cannot be used for the operation and maintenance of park facilities. The goal of the Quimby Act was to require developers to help mitigate the impacts of property improvements. The act gives authority for passage of land dedication ordinances only to cities and counties.

The Landscape and Lighting Act of 1972

The Landscape and Lighting Act of 1972 enables cities, counties and special districts to acquire land for parks, recreation and open space. A local government may also use the assessments to pay for improvements and maintenance in these areas.

3.14.2.2 Local Regulations

City of Escondido General Plan

Quality of Life Standard 6: Parks System

In conjunction with the General Plan Goals, Quality of Life Standards have been developed to establish minimum thresholds of service levels for various public improvements and facilities. According to Quality of Life Standard 6: Parks System, the city shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units. Urban recreational amenities such as exercise courses, urban trails, tree lined shaded walkways and plazas, etc. shall be focused in high intensity downtown and urban areas. Priority shall be given to acquiring land to expand Grape Day Park north of Woodward Avenue and developing neighborhood parks in urban areas with the greatest need. School playground areas may be included as park acreage, provided that neighborhood park amenities and facilities are accessible, approval is granted by the school district(s) and the facility is open to the public as determined by the City Council. Prior to build-out, the city shall provide a minimum of two (2) community centers. Other specialized recreation facilities shall be incorporated into the City's Master Plan for Parks, Trails and Open Space.

Community Health and Service Element

Goals and policies related to parks and recreation that are applicable to the proposed project are included below:

Parks and Recreation Goal 2: A complete system of park and recreational facilities and programs to serve all users.

Parks and Recreation Policy 2.3: Provide a minimum of 5.9 acres of developed active Neighborhood, Community, and Urban parks in addition to 5.9 acres of passive park land/open space for habitat preservation and additional recreational opportunities totaling 11.8 active and passive acres per 1,000 dwelling units. School playground areas can be included as park acreage if these facilities are approved by the school district(s) and open to the public as determined by the City Council.

Parks and Recreation Policy 2.4: Require new residential development to contribute fees to finance acquisition and development of park and recreational facilities in compliance with the standards stipulated by Parks and Recreation Policy 2.3. Allow credit for the on-site dedication of land or facilities to be used for public park purposes, consistent with city standards.

Parks and Recreation Policy 2.24: Consolidate new development onsite to accommodate parkland that is accessible to the public.

Parks and Recreation Policy 2.25: Require park or recreation facilities constructed as part of a private development and intended solely for use by its residents to be considered a private park.

Parks and Recreation Policy 2.27: Incorporate energy and water efficient land development and maintenance practices, including the use of drought tolerant landscaping and reclaimed irrigation, in the design, development and operation of public parks and open space areas as appropriate.

3.14.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to recreation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to recreation would occur if the project would:

- **Threshold #1:** 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.
- **Threshold #2:** Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.14.4 Project Impact Analysis

As discussed in Section 2.5.2 of this EIR, open space within the project would total 97,040 square feet (s.f.) (approximately 2.22 acres) and includes a mix of common open space and private open space. **Table 3.14-1** summarizes the proposed open space areas. The open space areas are shown in Figure 2-11 of Chapter 2.

Table 3.14-1. Proposed Open Space

Open Space Type	Amount Provided	
	Square Feet	Acres
Public Open Space		
Common Open Space Area (Grades less than 10%)	64,247 s.f.	1.48
Recreational Areas	11,359 s.f.	0.26
Subtotal	*75,606*	*1.74*
Private Open Space (1)		
Patios and Decks	21,434 s.f.	0.49
Subtotal	*21,434 s.f.*	*0.49*
Total Open Space	**97,040 s.f.**	**2.23**

Note: (1) Private opens space consists of private yard, private patio and/or private balcony/deck space. These areas are shown in pink on Figure 2-11

Common Open Space

Common open space area with grades less than 10 percent includes usable open space areas which encourage relaxation activities such as observing nature, bird watching, painting, photography, and picnicking as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas. The water quality basins would be used to direct water during rain events to control for flooding and to treat water before it is discharged from the site. These areas total 64,247 s.f. (1.48 acres) and would be maintained by the Homeowners Association.

The proposed project also includes recreational areas totaling 11,359 s.f. (0.26 acre). This includes a tot lot and barbeque area in the northeast portion of the site and an outdoor workout area in the northwest portion of the site. There would also be dispersed seating and patio areas throughout the

site. These areas would be maintained by the Homeowners Association. Therefore, the project would provide a combined total of approximately 1.74 acres of active and passive public open space.

Private Open Space

Private open space within the project area consists of private yard, private patio space and/or private balcony/deck space. The project would provide a total of 21,434 s.f. (0.49 acre) of outdoor private space.

3.14.4.1 Increase Demand for Existing Recreational Facilities

Threshold #1: 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?

The General Plan Quality of Life Standard #6 states that the City shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. As of 2012, the city had 6,556 acres of parkland and open space (City of Escondido 2012a) and, as of 2018, there were an estimated 48,268 housing units (City of Escondido 2018). This is equivalent to 136 acres of parkland per 1,000 units. Thus, the city has an existing surplus of park and open space land.

Implementation of the proposed project would include a net increase of 98 multi-family residential units, since four residences already exist on the site. Based on the population rate of 3.13 persons per dwelling unit, the proposed project would potentially add an estimated 307 residents to the city. To meet the General Plan Quality of Life Standard of 11.8 acres of parkland per 1,000 dwelling units, the addition of 98 residential units would require the provision of 1.16 acres of additional park and open space.

The project includes 64,247 s.f. (1.48 acres) of common open space area with grades less than 10 percent including usable open space areas which encourage relaxation activities such as observing nature, bird watching, painting, photography, and picnicking as well as recreational open space areas with amenities. Three water quality basin areas, which are located along the eastern portion of the project site, would be passive open space areas.

The proposed project also includes recreational areas totaling 11,359 s.f. (0.26 acre). This includes a tot lot and barbeque area in the northeast portion of the site and an outdoor workout area in the northwest portion of the site. There would also be dispersed seating and patio areas throughout the site. These areas would be maintained by the Homeowners Association. Therefore, the project would provide a combined total of approximately 1.74 acres of active and passive public open space. The project would also provide a total of 21,434 s.f. (0.49 acre) of outdoor private space.

Therefore, the proposed project would exceed the 1.16 acres of park/open space area General Plan requirement. Demand for recreational services from development of the proposed project would further be offset through payment of the Escondido Public Facility Development Fee, which would contribute to development of new parks and recreational facilities. As such, with payment of the required development fees in combination with provision of on-site common and private open space, the project would meet and exceed the anticipated demand for neighborhood and regional parks or other recreational facilities. Project residents would have access to adequate on-site recreational facilities, which will offset increased use of existing parks and recreational facilities. Therefore, project residents would not cause or result in the overuse of existing parks and recreational facilities such

that substantial physical deterioration would occur. Impacts to neighborhood and regional parks would be **less than significant.**

3.14.4.2 Physical Effects from Construction of Recreational Facilities

Threshold #2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impacts associated with construction of the proposed project's public and private open space are considered within the overall development footprint for the proposed project. Impacts from the development of proposed recreational facilities have been considered in the project impact analysis and mitigation measures for the proposed project as a whole are discussed in the various sections of this EIR.

As stated under Threshold #1, the project applicant would be required to pay the City's Public Facility Development Fee that would go towards the acquisition and development of local and community park facilities throughout the city. As such, the project applicant may contribute to the construction or expansion of recreational facilities offsite that may have an adverse physical effect on the environment. However, future expansion or development of new recreational facilities would be subject to CEQA environmental review as appropriate, which would identify and address any site-specific impacts. Therefore, impacts due to the construction or expansion of recreational facilities are considered **less than significant.**

3.14.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to recreation, the cumulative analysis is based upon a list approach to determine the proposed project's contributing effect on potential cumulative impacts related to recreation. All of the cumulative projects within the city identified in Table 2-2 are considered in this cumulative analysis.

Increase Demand for Existing Recreational Facilities

The proposed project as well as the cumulative projects that are in the City of Escondido (as identified in Table 2-2) would add to the cumulative demand for park and recreation facilities in the City. The proposed project would provide 75,606s.f. (1.74 acres) of common useable open space area including common open space area with grades of 10% or less and recreational areas. Further, private open space totaling 21,434 s.f. (0.49 acre) would be provided. The project applicant would be required to pay the City's Public Facility Development Fee which helps pay for the acquisition and development of local and community park facilities throughout the city.

All cumulative projects that increase the demand for park and recreation needs in the city would be required to provide park space and/or pay the City's development fees to offset that additional demand. Therefore, implementation of City policies, such as the collection of development fees, would

ensure that cumulative impacts to recreational facilities would be properly addressed and mitigated. Therefore, cumulative impacts to recreational facilities are considered **less than significant.**

Physical Effects from Construction of Recreational Facilities

Impacts associated with construction of the proposed project's public and private open space are considered within the overall development footprint for the proposed project. Impacts from the development of proposed recreational facilities have been considered in the project impact analysis and mitigation measures for the proposed project as a whole are discussed in the various sections of this EIR. Similarly, any substantial expansion or development of new recreational facilities by cumulative projects would be subject to the appropriate CEQA environmental review prepared by the city, which would identify and address any site-specific impacts. Therefore, implementation of City policies, such as the collection of development fees, along with compliance with CEQA requirements would ensure that cumulative impacts to recreational facilities would be properly addressed and mitigated. Therefore, cumulative impacts to recreational facilities are considered **less than significant.**

3.14.6 Mitigation Measures

No significant impacts to recreation were identified; thus, no mitigation is required.

3.14.7 Conclusion

Increase Demand for Existing Recreational Facilities

The proposed project would result in an increase in the City of Escondido population by approximately 307 residents. The additional residents would require approximately 1.16 acres of new park space to fulfill the City's General Plan Quality of Life Standard of 11.8 acres of parkland per 1,000 dwelling units. The proposed project would be required to pay the Escondido Public Facility Development Fee to go toward the acquisition and development of local and community park facilities throughout the city in addition to what is provided on-site. The project includes 75,606 s.f. (1.74 acres) of common useable open space including recreational areas and 21,434 s.f. (0.49 acres) of private open space. As such, with payment of the required development fees in combination with provision of on-site common and private open space, the project would meet and exceed the anticipated demand for neighborhood and regional parks or other recreational facilities. Project residents would not cause or result in the overuse of existing parks and recreational facilities such that substantial physical deterioration would occur and impacts to neighborhood and regional parks would be **less than significant.**

Impacts associated with construction of the proposed project's public and private open space are considered within the overall development footprint for the proposed project. Impacts from the development of proposed recreational facilities have been considered in the project impact analysis and mitigation measures for the proposed project as a whole are discussed in the various sections of this EIR. Therefore, impacts resulting from construction of new park facilities would be **less than significant.**

3.15 Transportation

This section of the Environmental Impact Report (EIR) analyzes the proposed project impacts on transportation and traffic, including the project's conformance with the City's regulatory policies regarding effectiveness of the performance of the circulation system, conformance with an applicable congestion management plan, traffic hazards and emergency access, and consistency with alternative transportation policy. This section is based on a Draft Vehicle Miles Traveled and Local Mobility Analysis report prepared by LOS Engineering on September 1, 2022 which is included as Appendix K to this EIR.

3.15.1 Existing Conditions

3.15.1.1 Pedestrian Connections

There are no sidewalks on the west side of North Iris Lane along the project frontage nor are there any sidewalks along Robin Hill Lane along the project frontage. There is an existing sidewalk on the west side of North Iris Lane from the southern property boundary extending to the south approximately 650 feet (this section has intersection curb ramps). From this section of sidewalk, there is no sidewalk down to Centre City Parkway, a distance of approximately 370 feet on the west side of North Iris Lane. On the east side, there are no sidewalks from south of Elkhorn to Centre City Parkway, a distance of approximately 600 feet. There is an existing sidewalk on the west side of North Iris Lane from the northern property boundary extending to the north for more than ¼ mile. The westside sidewalk on North Iris Lane north of Robin Hill Lane has intersection curb ramps; however, there are three power poles within the sidewalk walking area along this segment. **Figure 3.15-1** illustrates the existing missing sidewalk segments along the project frontage on North Iris Lane and Robin Hill Lane.

3.15.1.2 Bicycle Facilities

Existing and planned bicycle facilities with any substandard or missing facilities (e.g., bike lane gaps, obstructions) within a 1-mile bicycling distance measured from the centroid point of the parcel's linear frontage or from the center of the intersection formed by each project driveway was documented. **Figure 3.15-2** shows the existing and proposed within a 1-mile bicycling distance from the project site. The existing and proposed bike lanes/routes included:

- Centre City Parkway within a 1-mile bicycling distance of the site has existing Class II bike lanes. Country Club Lane/Rincon Avenue has existing Class II bike lanes within a 1-mile bicycling distance of the site.
- El Norte Parkway near the intersection of S. Iris Ln within a 1-mile bicycling distance of the project site has existing Class III bike lanes or bike sharrows.[4]
- North Broadway south of Rincon Ave within a 1-mile bicycling distance of the project site has existing Class II bike lanes.
- North Broadway north of Rincon Avenue within a 1-mile bicycling distance of the site has proposed Class III bike markings. There were no observed Class III bike markings along this segment.

[4] A sharrow is a road marking in the form of two inverted V-shapes above a bicycle, indicating which part of a road should be used by cyclists when the roadway is shared with motor vehicles.

- North Iris Lane within a 1-mile bicycling distance of the project site has proposed Class III bike markings. There were no observed Class III bike markings along this segment.

3.15.1.3 Transit Amenities

North County Transit District (NCTD) provides bus service as Route 358 and 359 along North Broadway with bus stops near North Broadway at Village Road. No bus service is provided along the project frontage. Bus Route 358 runs southbound on North Broadway and Route 359 runs northbound on North Broadway. These routes operate Monday through Friday from approximately 6 AM to 8 PM with a service frequency of approximately two hours. There is no weekend service on these two routes. The main destination/connection of these routes is the Escondido Transit Center that provides connections with Routes 305, 308, 350, 351/352, 353, 354, 355/357, 356, FLEX 371/372, 388, MTS 235, 280, SPRINTER, Greyhound, and RTA 217. Additional destinations include Escondido Civic Center, Kaiser Permanente, Regal Cinemas, Escondido Senior Center, Escondido High School, YMCA, Vons, and Stater Brothers.

There are no transit stops within ¼-mile walking distance to the project site; however, the two transit stops noted above are just over a ¼-mile walking distance (approximately 1,500 feet away). These bus stops are on North Broadway near Village Road. The southbound bus stop has a bus stop sign, a bench, and a trash receptacle. The northbound bus stop has a bus stop sign, a bench with shelter, and a trash receptacle. Both bus stops are in good condition, thus no improvements are proposed.

3.15.1.4 Roadways

Roadway Network

In the vicinity of the project, the following roadway was analyzed as part of this study with roadway conditions as shown in **Figure 3.15-3.**

North Iris Lane from Village Road to Centre City Parkway is classified as a Local Collector in the City of Escondido 2012 General Plan. This segment of roadway is construct as a 2-lane un-divided roadway and has a posted speed of 35 miles per hour (MPH) and no bike lanes. For the purposes of this analysis, the segment of North Iris Lane from Robin Hill Lane to Centre City Parkway was analyzed with a capacity of 10,000 ADT at LOS E due to two sections that are not constructed to the ultimate classification width even though the number of travel lanes match the classification. The sections currently not built to the final cross section are from Centre City Parkway to south of Elkhorn Lane (580 feet (both sides)), and from just north of Cheyenne Lane to Robin Hill Lane (880 feet (west side).

The traffic analysis study includes the following intersections:

1. North Iris Lane/Village Road (un-signalized)
2. North Iris Lane/Robin Hill Lane (un-signalized)
3. North Iris Lane/Iris Glen Private Driveway (un-signalized)
4. Centre City Parkway/Iris Lane (signalized)

And the following street segments:

1. North Iris Lane from Village Road to Robin Hill Lane
2. North Iris Lane from Robin Hill Lane to Centre City Parkway

Level of Service

The traffic analyses prepared for this study were based on the *Highway Capacity Manual* (HCM) operations analysis using Level of Service (LOS) evaluation criteria. This analysis method assigns roadways and intersection operations a LOS operating level, where LOS A represents free-flowing traffic and LOS F represents severely congested traffic conditions. The intersection LOS is determined by average control delay, measured in seconds, per vehicle experienced at the intersection. LOS at the intersections were calculated using the computer software program Synchro 10 (Trafficware Corporation). The 6th Edition HCM LOS for the range of delay by seconds for intersections is shown in **Table 3.15-1**.

Table 3.15-1: Intersection Level of Service Definitions

LOS	Signalized Intersections	Unsignalized Intersections(1)	Description
A	≤10	≤10	Operations with very low delay and most vehicles do not stop.
B	>10 and ≤20	>10 and ≤15	Operations with good progression but with some restricted movements.
C	>20 and ≤35	>15 and ≤25	Operations where a significant number of vehicles are stopping with some backup and light congestion.
D	>35 and ≤55	>25 and ≤35	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines.
E	>55 and ≤80	>35 and ≤50	Operations where there is significant delay, extensive queuing, and poor progression.
F	>80	>50	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

Source: 6th Edition Highway Capacity Manual.
Note: (1) For unsignalized intersections, the control delay is the worst movement delay in seconds/vehicle.

The roadway LOS is assigned by determining the roadway volume to capacity (V/C) ratio, with the volume based on the average daily traffic on the roadway and the capacity based on the roadway classification capacity identified in the General Plan Circulation Element. The street segments were analyzed based on the functional classification of the roadway using the City of Escondido Street Segment Average Daily Vehicle Trip Thresholds table. The roadway segment capacity and LOS standards used to analyze street segments are summarized in **Table 3.15-2**.

Table 3.15-2: Street Segment Daily Capacity and LOS (City of Escondido)

Circulation Element Road Classification	Cross Sections (feet)	LOS A	LOS B	LOS C	LOS D	LOS E
Prime Arterial — 8 Lanes	116/136 (NP)	23,800	37,800	51,800	62,300	70,000
Prime Arterial – 6 Lanes	106/126 (NP)	20,400	32,400	44,400	53,400	60,000
Major Road – 6 Lanes	90/110 (NP)	17,000	27,000	37,000	44,500	50,000

Circulation Element Road Classification	Cross Sections (feet)	LOS A	LOS B	LOS C	LOS D	LOS E
Major Road – 4 Lanes	82/102 (NP)	12,600	20,000	27,400	32,900	37,000
Collector – 4 Lanes	64/84 (NP)	11,600	18,500	25,300	30,400	34,200
Collector – 4 Lanes	(WP)	6,800	10,800	14,800	17,800	20,000
Local Collector – 2 Lanes	42/66 (NP)	5,100	8,100	11,100	13,400	15.000
Local Collector – 2 Lanes	(WP)	3,400	5,400	7,400	8,900	10,000

Source: City of Escondido Transportation Impact Analysis Guidelines April 21, 2021.
Notes: NP: No Parking. WP: With Parking

Existing Traffic Volumes

Intersection counts were collected in the AM Peak 7:00 AM to 9:00 AM and the PM Peak (4:00 PM to 6:00 PM) at the following locations with count dates noted in parentheses:

1. North Iris Lane/Village Road (10/7/2020)
2. North Iris Lane/Robin Hill Lane (10/7/2020)
3. North Iris Lane/Iris Glen minor leg movements for Meadowbrook Village (8/31/2021)
4. Centre City Parkway/Iris Lane (5/3/2018 & 10/7/2020)

The following street segments were also counted over a 24-hour period:

1. North Iris Lane from Village Road to Robin Hill Lane (10/7/2020)
2. North Iris Lane from Robin Hill Lane to Centre City Parkway (5/3/2018 and 10/7/2020)

Due to the COVID-19 Pandemic, historical year 2018 and current year 2020 counts were reviewed to determine which volumes should be used to represent existing conditions. All year 2020 counts collected above were lower than year 2018 counts as follows. ADTs were 35.7% lower. The intersection of Centre City Parkway/Iris Lane was 92% lower in the AM and 16% lower in the PM. Therefore, the higher year 2018 counts were used to represent existing conditions for the following locations:

1. Intersection of Centre City Parkway/Iris Lane (2018 data used), and
2. Segment of North Iris Lane from Robin Hill Lane to Centre City Parkway (2018 data used).

For the locations that did not have historical year 2018 counts available, a growth factor was applied to year 2020 counts to represent existing conditions. The growth factor was calculated by taking the reduction between year 2020 and year 2018 counts on the segment of North Iris Lane between Robin Hill Lane and Centre City Parkway. This segment had a 35.7% reduction in traffic volume. Therefore, a growth factor of 35.7% was applied to the following locations to represent existing conditions:

1. Intersection of North Iris Lane/Village Road (2020 data factored up by 35.7%),
2. Intersection of North Iris Lane/Robin Hill Lane (2020 data factored up by 35.7%), and

3. Segment of North Iris Lane from Village Road to Robin Hill Lane (2020 data factored up by 35.7%).

The turn moves entering and exiting Meadowbrook Village at North Iris Lane/Iris Glen (minor leg movements) were counted on 8/31/21. These 8/31/21 turn moves were compared against the forecast turn moves in the Meadowbrook Village Transportation Impact Analysis (TIA). The higher volumes from the TIA were used for existing conditions.

The LOS calculated for the intersections and roadway segments are included in **Tables 3.15-3** and **3.15-4**.

Table 3.15-3 Existing Intersection Level of Service

#	Intersection	Control Type	Movement	Study Period	Existing	
					Delay(1)	LOS(2)
1	N. Iris Lane at Village Road	Unsignalized	All	AM	10.3	B
			All	PM	17.6	C
2	N. Iris Lane at Robin Hill Lane	Unsignalized	EB	AM	11.5	B
			EB	PM	9.6	A
3	N. Iris Lane at Iris Glen	Unsignalized	EB	AM	0.0	A
			WB	AM	14.3	B
			EB	PM	0.0	A
			WB	PM	18.4	C
4	Centre City Parkway at Iris Lane	Signalized	All	AM	36.2	D
			All	PM	22.8	C

Source: LOS Engineering 2022.
Notes: (1) Average Delay expressed in seconds per vehicle.
(2) Level of Service.

Table 3.15-4. Existing Segment Volumes and Level of Service

Roadway Segment	General Plan Classification	Capacity (LOS E)	Existing		
			Daily Vol(1)	V/C(2)	LOS(3)
North Iris Lane:					
Village Road to Robin Hill Lane	2- Lane Local Collector	15,000	8,466	0.564	C
Robin Hill Lane to Centre City Parkway	2- Lane Local Collector	10,000	8,996	0.000	E

Source: LOS Engineering 2022.

Notes: (1) Daily volume is a 24 hour volume
(2) V/C: Volume to Capacity Ratio
(3) LOS: Level of Service

Under existing conditions, all the study intersections and segments were calculated to operate at acceptable LOS D or better with the exception of North Iris Lane from Robin Hill Lane and Centre City Parkway, which is operating at LOS E. There is also an existing long westbound left turn queue from North Iris Lane to Centre City Parkway.

3.15.2 Regulatory Framework

3.15.2.1 Federal

Highway Capacity Manual

The Highway Capacity Manual prepared by the federal Transportation Research Board is the result of a collaborative multiagency effort between the Transportation Research Board, Federal Highway, and American Association of State Highway and Transportation Officials. The HCM 6th Edition: A Guide for Multimodal Mobility Analysis (2016) contains concepts, guidelines, and procedures for computing the capacity and quality of service of various highway facilities—including freeways, signalized and unsignalized intersections, and rural highways—and the effects of transit, pedestrians, and bicycles on the performance of these systems.

Title 23, Code of Federal Regulations

Title 23 Code of Federal Regulations, Section 450.220, "Highways," requires each state to carry out a continuing, comprehensive, and intermodal statewide transportation planning process. This planning process must include development of a statewide transportation plan and transportation improvement program that facilitates the efficient, economical movement of people and goods in all areas of the state. In the San Diego region, compliance with this federal regulation is provided though the San Diego Association of Governments' (SANDAG's) San Diego Forward: The Regional Plan.

3.15.2.2 State

Statewide Transportation Improvement Program

As indicated above, "Highways" in the Code of Federal Regulations, requires statewide transportation plans. Pursuant to this requirement, California adopted the California 2010 Statewide Transportation Improvement Program. The STIP is prepared by Caltrans in cooperation with the Metropolitan Planning Organizations (MPO) and the regional transportation planning agencies. In San Diego County, the MPO and regional transportation planning agency is SANDAG. The STIP contains all capital and non-capital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the CFR, including federally funded projects.

California Department of Transportation

The California Department of Transportation (Caltrans) is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for roadway traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be

undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

AB 1358 – California Complete Streets Act of 2008

The California Complete Streets Act of 2008 (Assembly Bill [AB] 1358) requires circulation elements as of January 1, 2011 to accommodate the transportation system from a multi-modal perspective, including public transit, walking and biking, which have traditionally been marginalized in comparison to autos in contemporary American urban planning.

SB 743, CEQA Guidelines Update

SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change is being made by replacing LOS with Vehicle Miles Traveled (VMT) and providing streamlined review of land use and transportation projects that will help reduce future VMT growth. This shift in transportation impact focus is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Office of Planning and Research (OPR) published its latest Technical Advisory on Evaluating Transportation Impacts in CEQA to the California Natural Resources Agency in December 2018. This Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant CEQA transportation impacts. The OPR guidance recommends the use of VMT as the preferred CEQA transportation metric. To comply with the new legislation, The City of Escondido has adopted VMT thresholds as part of their Transportation Impact Analysis Guidelines (City of Escondido 2021). These Guidelines identify VMT analysis methodology, establishment of VMT thresholds for CEQA transportation impacts, and identification of possible mitigation strategies.

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (e.g., VMT/capita). VMT tends to increase as land use density decreases and travel becomes more reliant on the use of the automobile due to the long distances between origins and destinations. VMT can also serve as a proxy for impacts related to energy use, air pollution emissions, GHG emissions, safety, and roadway maintenance. The relationship between VMT and energy or emissions is based on fuel consumption. The traditional use of VMT in environmental impact analysis is to estimate mobile air pollution emissions, GHGs, and energy consumption.

3.15.2.3 Regional/Local Regulations

SANDAG San Diego Forward: The Regional Plan

The Regional Comprehensive Plan (RCP), adopted in 2004 by the San Diego Association of Governments (SANDAG), laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form,

transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity.

In 2011, SANDAG approved the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included a sustainable communities strategy, consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the California Air Resources Board (CARB) as required by the 2008 Sustainable Communities Act. In 2010, CARB established targets for each region in California governed by a metropolitan planning organization. SANDAG is the metropolitan planning organization for the San Diego region.

The SANDAG target, as set by CARB, is to reduce the region's per capita emissions of greenhouse gas emissions from cars and light-duty trucks by 7% by 2020, compared with a 2005 baseline. By 2035, the target is a 13% per capita reduction. There is no target set beyond 2035. To achieve the 2020 and 2035 targets, SANDAG and other metropolitan planning organizations are required to develop a Sustainable Communities Strategy (SCS) as an element of its RTP. The SANDAG SCS integrates land use and transportation plans to achieve reductions in greenhouse gas emissions and meet the CARB-required targets.

On October 9, 2015, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan (Regional Plan). The Regional Plan combines the two previously described existing regional planning documents: the RCP and the RTP/SCS. The Regional Plan updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the County. SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan, and other local General Plans of cities, may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. The General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG's RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years.

In 2019, the SANDAG Board of Directors adopted the San Diego Forward: The 2019 Federal Regional Transportation Plan. It combines the big-picture vision for how the region will grow by 2050 with an implementation program to help make that vision a reality. The SANDAG Board of Directors adopted the 2021 Regional Plan on December 10, 2021. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources.

The Regional Plan is updated every four years and combines three planning documents that SANDAG must complete per state and federal laws: The Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The Regional Plan also supports other regional transportation planning and programming efforts, including overseeing which projects are funded under the Regional Transportation Improvement Program and the TransNet program. SANDAG is applying data-driven strategies, innovative technologies, and stakeholder input to create a future system that is faster, fairer, and cleaner. Part of this data-driven approach includes the implementation of five key transportation strategies referred to as the 5 Big Moves. These strategies provide the

framework for the Regional Plan and consider policies and programs, changes in land use and infrastructure, take advantage of the existing transportation highway and transit networks, and leverage trends in technology to optimize use of the transportation system. Together, these initiatives will create a fully integrated, world-class transportation system that offers efficient and equitable transportation choices, meets state climate targets, and supports local jurisdictions' achievements of Climate Action Plan goals.

Congestion Management Program (CMP)

The 2008 Congestion Management Program (CMP) for San Diego County was developed to meet the requirements of Section 65089 of the California Government Code. Since that time, the local agencies within San Diego County approved to opt out of the CMP requirements, as allowed within the Government Code. As such, there are no CMP-specific requirements associated with this project. However, to ensure the region's continued compliance with the federal congestion management process, SANDAG has prepared San Diego Forward: The Regional Plan in compliance with 23 Code of Federal Regulations 450.320. The Regional Plan incorporates performance monitoring and measurement of the regional transportation system, multimodal alternatives to single-occupancy vehicles, land use impact analysis, congestion management tools, and Integration with the Regional Transportation Improvement Program process.

City of Escondido Bicycle Master Plan

The City of Escondido's Bicycle Master Plan identifies existing circulation patterns for bicyclists, and problem areas and safety concerns; it also develops a master system to further the implementation of bikeways throughout Escondido. The Bicycle Master Plan includes California Department of Transportation bikeway standards, conceptual designs for bicycle paths and trails, maps of existing and proposed bicycle facilities, a phasing plan for improvements, funding sources, and an implementation plan. The plan identifies a bicycle facility network, both on the road (Classes II and III) and off-road (Class I). Upon full implementation, the plan will create a comprehensive network of bicycle lanes, routes, and paths. The City of Escondido's 2011 Bicycle Master Plan was adopted on October 17, 2012.

Chapter 23 City of Escondido Municipal Code

Chapter 23 of the City's Municipal Code establishes street and sidewalk standards for areas within the city. This chapter defines standards for public dedication of rights-of-way, arrangement for relocation of public utility facilities within sidewalks or streets, and issuance of building permits for construction in setback areas and rights-of-way. Additionally, this chapter identifies standards for locating pumps, tanks, and fire hydrants within sidewalks, streets, or rights-of way.

City of Escondido General Plan

The *City of Escondido General Plan* (City of Escondido 2012a) includes several transportation and traffic policies. Relevant policies are identified below.

Complete Streets Policy 2.1: Ensure that the existing and future transportation system is interconnected and serves multiple modes of travel, such as walking, biking, transit, and driving for safe and convenient travel.

Complete Streets Policy 2.4: Evaluate access, safety, and convenience of various transportation modes for the following eight user groups for every project: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services

Pedestrian Network Policy 3.3: Maintain a pedestrian environment accessible to all that is safe, attractive, and encourages walking.

Pedestrian Network Policy 3.5: Promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; orienting development toward the street; employing traffic calming measures; and enforcing vehicle speeds on both residential and arterial streets.

Bicycle Network Policy 4.3: Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.

Transit System Policy 5.8: Require that new developments incorporate transit-supporting facilities into the project design, where appropriate.

Street Network Policy 7.3: Strive to maintain LOS C or better throughout the city except for within the urban core. Establish LOS D as the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented "smart growth" and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city.

Street Network Policy 7.7: Require new development projects to analyze traffic impacts on the regional transportation system, and pay a fair-share contribution to regional transportation improvements.

Street Network Policy 7.8: Require new development projects to analyze traffic impacts on the regional transportation system, and pay a fair-share contribution to regional transportation improvements.

Street Network Policy 7.11: Enhance the safety and efficiency of accessing the public street network from private properties by: a) Controlling driveway access locations on Prime Arterials and Major Roads; b) Installing medians and access controls on Collector Roads and higher classifications; c) Maintaining minimum distances from intersections for accessing Prime Arterials, Major Roads, and Collector streets; d) Consolidating driveway access; and e) Encouraging interconnected parking lots.

Disaster Preparedness and Emergency Response Goal 1: A prepared and responsive community in the event of disasters and emergencies.

Emergency Services Policy 1.6: Require minimum road and driveway widths and clearances around structures consistent with local and State requirements to ensure emergency access.

Fire Protection Policy 2.8: Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow requirements in the review of all development applications to minimize fire hazards.

Fire Protection Policy 2.12: Maintain close coordination between planned roadway and other circulation improvements in the city to assure adequate levels of service and response times to all areas of the community.

City of Escondido Transportation Impact Analysis Guidelines

The Transportation Impact Analysis Guidelines (TIAG) provides criteria on how projects should be evaluated for consistency related to the City's transportation goals, policies, and plans, and through procedures established under CEQA. The TIAG establishes the contents and procedures for preparing a Transportation Impact Analysis in the City of Escondido. The purpose of the TIAG (and a Transportation Impact Analysis) is to inform land use and development decisions by providing qualitative and quantitative criteria to assess the transportation system within the vicinity of a land development project. The City TIAG is a comprehensive manual for both CEQA VMT analysis and discretionary/entitlement non-CEQA Local Mobility Analysis (LMA) to ensure compliance with the City's General Plan. The TIAG provides guidance for the two elements of transportation analyses needed to comprehensively assess the potential effects from new development to the City's roadway and mobility system.

City of Escondido VMT Exchange

The City is in the process of developing and finalizing a VMT Exchange Program to provide programmatic mitigation options to projects with transportation VMT impacts. The VMT Exchange Program provides a list of community-based transportation projects and programs that can be selected to be full or partial mitigation for a transportation VMT impact. While the VMT Exchange Program has not yet been adopted, it does identify a methodology for mitigating VMT impacts.

VMT Analysis

CEQA requires VMT analysis for compliance with state policies to evaluate a project's potential impacts related to VMT significance criteria. The VMT analysis will:

- Enable proposed development projects to comply with current CEQA requirements as a result of the implementation of SB 743.
- Outline the City's VMT significance thresholds, screening criteria, and methodology for conducting the transportation VMT analysis.
- Help determine if mitigation is required to offset a project's significant VMT impacts.
- Identify VMT reduction measures and strategies to mitigate potential impacts below a level of significance.
- Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the City.

In general, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT. For residential uses, VMT/capita is the appropriate metric. VMT/capita is established by summing up total daily VMT generated by residents of a geographic area and dividing by the population of that geographic area. Total daily VMT includes all trip tours made by residents: home-based and non-home-based trip tours (i.e., all VMT for a resident for the entire day regardless of trip purpose or origin/destination). To analyze the VMT/capita for a proposed project, total daily VMT generated by project residents is divided by the project resident population.

VMT Thresholds of Significance

Projects that do not meet screening criteria listed in the TIAG must include a detailed evaluation of the VMT produced by the project. The significant thresholds and specific VMT metrics used to measure VMT are described by land use type below.

- Residential: 15% below regional average VMT/capita
- Employment: 15% below regional average VMT/employee
- Industrial Employment: At or below regional average VMT/employee
- Mixed-Use: Each project component evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail)
- Regional Retail, Regional Recreational, or Regional Public Facilities: A net increase in total regional VMT using the boundary method.
- Specific Plans or General Plan Amendments: The land use plan should be compared to the region overall. Comparison to the region is appropriate because large land use plans can have an effect on regional VMT (akin to how a regional retail project affects regional VMT). The significance thresholds described above apply to specific plans or General Plan Amendments. In addition, plan buildout/cumulative analysis is needed.

Methodology for Residential Projects

For projects that generate fewer than 2,400 daily unadjusted driveway trips:

- Identify the location of the project on SANDAG's VMT/capita map. The project's VMT/capita will be considered the same as the VMT/capita of the census tract it is located in. Compare the project's VMT/capita to the threshold to determine if the impact is significant, or input the project into the SANDAG Regional Travel Demand Model to determine the project's VMT/capita.

For projects that generate 2,400 or greater daily unadjusted driveway trips:

- Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's VMT/capita. To perform the analysis, all project land uses should be inputted, and the VMT/capita should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/capita metric. Note that there may be some circumstances where use of the screening maps or other sketch modeling tools are appropriate for larger projects.

Transportation Analysis (Local Mobility Analysis)

A Local Mobility Analysis (LMA) is required by the City of Escondido to assess transportation effects and ensure orderly development, public safety, adequate infrastructure, and consistency with the General Plan. The LMA evaluates the effects of a proposed development project on traffic operations and safety for the roadway network in the proximate area of the project. The LMA analysis will:

- Specify the City's screening criteria, study area, and methodologies to assess the potential need for off-site operation improvements to the project study area transportation network.

- Ensure that the local transportation facilities will have sufficient capacity to accommodate the project's demand on various modes of travel, and that improvements identified by the City are constructed when needed consistent with the City's adopted standards and policies.
- Ensure consistency with transportation planning documents (such as bicycle and pedestrian planning efforts).
- Establish measures of effectiveness to maintain vehicular LOS consistent with the City's General Plan Mobility and Infrastructure Element, as may be amended from time to time.
- Facilitate site project access and roadway frontage infrastructure improvements to serve the project vicinity.
- Identify project-level design features, standards, and/or conditions appropriate to, and as applied to facilitate General Plan consistency review and make determinations on new land use development projects. General Plan consistency findings, when required by State law or by the City's Municipal or Zoning Code, shall be based upon the implementation of the recommended design features, standards, and/or conditions and be the basis to make one or more findings to disapprove, approve, or conditionally approve a land use development project application.

LOS Thresholds of Significance

Per the TIAG, the following thresholds shall be used to identify if a project is responsible to make transportation operational improvements. If at any time the project causes the values in **Table 3.15-5** to be exceeded on a roadway segment or at an intersection that is operating at a LOS D or worse, the project shall identify improvements to achieve the desired LOS/delay. Table 3.15-5 provides LOS thresholds for determining when improvements are needed to a roadway segment or an intersection.

As shown in Table 3.15-5, if a proposed project's traffic increases the delay at an intersection operating at LOS D, E, or F by 2 seconds or increases the V/C ratio by 0.02 at a segment operating at LOS D, E, or F, the effects of the project are determined to justify improvements.

Table 3.15-5. City of Escondido Level of Service Thresholds

Level of Service with Project	Allowable Change Due to Project		
	Roadway Segments		Intersections
	V/C(1)	Speed (mph)	Delay (sec.)
D, E, or F	0.02	1	2

Source: City of Escondido. *Transportation Impact Analysis Guidelines*. April 2021.
Note: (1) V/C: Volume to capacity ratio.
The Downtown Specific Plan identifies select roadway segments where LOS E is acceptable if adjacent intersection operations are LOS D or better. Transportation Improvement should be considered for any segment or intersection operating at LOS F. The roadway capacity is the LOS E threshold.

3.15.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts on transportation/

traffic. An impact would be considered significant if construction or operation of the proposed project would have any of the following consequences.

- **Threshold #1:** Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- **Threshold #2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b);
- **Threshold #3:** Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- **Threshold #4:** Result in inadequate emergency access.

3.15.4 Project Impact Analysis

Development of the project will generate traffic to area roadways through project construction and operation. The following transportation design features and regulatory compliance measures will be implemented by the project.

Project Design Features

- Widen North Iris Lane along the project frontage to create a 62-foot right-of-way.
- Install sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 feet).
- Install Class III bike markings along the project's frontage on North Iris Lane.
- The Homeowners Association shall provide information about SANDAG's iCommute program to encourage carpooling.
- The Homeowners Association shall provide information about maps, routes, and schedules for public transit.

Regulatory Compliance Measures

- The project applicant will pay a fair share for the widening of North Iris Lane for approximately 280 linear feet northeast of City Centre Parkway. The fair share is calculated at 6.5% and resulting in a fee requirement of $10,075.
- The project applicant will pay a fair share towards a City improvement at the intersection of City Centre Parkway and North Iris Lane. The improvements include modifying the intersection operations to a split phase on North Iris Lane and restriping the westbound approach on North Iris Lane from a left and through right configuration to a left and left-through configuration. The fair share is calculated at 3.1% and resulting in a fee requirement of $6,975.

3.15.4.1 Conflicts with Policies Addressing Circulation System

Threshold #1: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Pedestrian/Bicycle/Transit

The project would not result in any impact to existing built out pedestrian and bicycle facilities in the project vicinity. As part of the project, the applicant will install sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 ft). The sidewalk to be constructed on the westside of North Iris Lane along the project frontage will complete a missing section improving pedestrian network connectivity for the neighborhood. No other off-site sidewalk improvements are proposed within a ¼-mile walking distance of the project entrance. Additionally, as part of the project, the applicant will install Class III bike markings along the project's frontage on North Iris Lane.

The closest bus stops are 0.25 mile (approximately 1,500 feet away) from the project site and would not be impacted by the project. **No impact** related to a conflict with a program plan, ordinance, or policy addressing transit, bicycle and pedestrian facilities is identified for the project.

Roadways

As stated above in Section 3.15.2.3, if at any time the project causes the values in Table 3.15-5 to be exceeded on a roadway segment or at an intersection that is operating at a LOS D or worse, the project shall identify improvements to achieve the desired LOS/delay. As shown in Table 3.15-5, if a proposed project's traffic increases the delay at an intersection operating at LOS D, E, or F by 2 seconds or increases the V/C ratio by 0.02 at a segment operating at LOS D, E, or F, the effects of the project are determined to justify improvements.

Project Trip Generation

The project trip generation was calculated using SANDAG trip rates from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002, for the condominium/multi-family development classification. To be conservative, a trip credit was not applied for the existing four single family homes which will be demolished as part of the project.

The 102 units are calculated to generate 816 Average Daily Trips (ADT) with 65 AM peak hour trips (13 in and 52 out) and 81 PM peak hour trips (57 in and 24 out) as shown in **Table 3.15-6.**

Table 3.15-6. Project Trip Generation

Land Use	Rate	Size/Units	ADT	AM Peak Hour				PM Peak Hour			
				% of ADT	In:Out Split	Volume		% of ADT	In:Out Split	Volume	
						In	Out			In	Out
Multi-Family Residential	8/DU	102 DU	816	8%	20:80	13	52	10%	70:30	57	24

Source: LOS Engineering 2022.

Note: Trip generation rates were obtained from the *(Not so) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002 by SANDAG.

Project Construction Traffic

Construction traffic includes demolition (removal of existing structures), site preparation (export of basted materials for offsite crushing), grading (soil import), paving, building construction, and

architectural coating. Additionally, deliveries of concrete and materials will occur over different phases of activity.

Construction work does not start until 7 AM; however, workers arrive before 7 AM for pre-work task meetings or coordination. Since workers arrive before 7 AM, there will not be any construction worker traffic added to the 7AM to 9 AM peak hour analysis. These workers will typically leave around 3:30 PM; however, a few workers (estimated at 10) may stay late due to unforeseeable circumstances (not anticipated to occur on a regular basis). To account for the unforeseeable circumstances, 10 construction workers are shown in the outbound construction PM peak hour. Work is anticipated to occur Monday through Friday with some potential Saturday work if required.

The highest number of construction workers occurs during the building construction phase. During this phase, there are 112 forecasted workers, and the vendor truck trips are forecasted at approximately 26 per day over an 8-hour period (about 3-4 trucks per hour inbound or 3-4 trucks per hour outbound, which is about 8 inbound and 8 outbound with a Passenger Car Equivalent [PCE] factor of 2 applied). The number of workers and vendor truck trips are from the California Emissions Estimator Model (CalEEMod) provided by LDN Consulting, Inc. As shown in **Table 3.15-7**, the highest number of construction workers results in a construction traffic generation of 328 ADT, 16 AM peak hour trips, and 26 PM peak hour trips, which is less than what was analyzed for project operations (816 ADT, 65 AM and 81 PM); therefore, the project traffic generation analysis provides a conservative analysis over the temporary construction traffic.

Table 3.15-7. Project Construction Traffic Generation (Highest Phase)

Highest Concentration Trip Generation	Construction Workers by Phase	Deliveries/ Trucks by Phase	ADT	AM Peak Hour (1 hour between 7 AM and 9 AM)		PM Peak Hour (1 hour between 4 PM and 6 PM)	
				In	Out	In	Out
Building Construction Workers	Up to 112	Not applicable	224	0	0	0	10(1)
Building Construction Deliveries(2)	Not applicable	Up to 26	104	8	8	8	8
		Totals	**328**	**8**	**8**	**8**	**18**

Source: LOS Engineering 2022.
Worker egress of ten PM peak hour trips is not anticipated to occur on a daily basis, rather it would only occur when there are unforeseeable circumstances where a few workers may remain later than normal to complete the work.

Notes: (1) Worker egress of ten PM peak hour trips is not anticipated to occur on a daily basis, rather it would only occur when there are unforeseeable circumstances where a few workers may remain later than normal to complete the work.
(2) Includes Passenger Car Equivalent factor of 2.0.

Local Transportation Analysis of Existing Plus Project Conditions

This scenario accounts for the addition of project traffic onto existing conditions. As shown in **Tables 3.15-8 and 3.15-9**, under existing plus project conditions, the study intersections and segments were calculated to operate at LOS D or better with the exception of North Iris Lane from Centre City Parkway

(LOS E). There is a calculated project traffic effect along the segment of North Iris Lane from Robin Hill Lane to Centre City Parkway.

Additionally, the project will add traffic to the existing westbound left turn queue from North Iris Lane to Centre City Parkway.

Table 3.15-8. Existing Plus Project Intersection Level of Service

Intersection	Control Type	Movement	Study Period	Existing		Existing + Project		Δ[3]	Project Effect?
				Delay[1]	LOS[2]	Delay[1]	LOS[2]		
N. Iris Lane at Village Road	Unsignalized	All	AM	10.3	B	10.5	B	0.2	No
		All	PM	17.6	C	18.4	C	0.8	No
N. Iris Lane at Robin Hill Lane	Unsignalized	EB	AM	11.5	B	12.8	B	1.3	No
		EB	PM	9.6	A	12.6	B	3.0	No
N. Iris Lane at Iris Glen	Unsignalized	EB	AM	0.0	A	12.5	B	12.5	No
		WB	AM	14.3	B	15.3	C	1.0	No
		EB	PM	0.0	A	11.2	B	11.2	No
		WB	PM	18.4	C	19.9	C	1.5	No
Centre City Parkway at Iris Lane	Signalized	All	AM	36.2	D	36.6	D	0.4	No
		All	PM	22.8	C	23.7	C	0.9	No

Source: LOS Engineering 2022.
Notes: [1] Average Delay expressed in seconds per vehicle.
[2] Level of Service.
[3] Δ denotes the increase in delay due to project.

Table 3.15-9. Existing Plus Project Segment Volumes and Level of Service

Roadway Segment	General Plan Classification	Capacity (LOS E)	Existing			Project	Existing + Project			Δ[4]	Project Effect?
			Daily Vol[1]	V/C[2]	LOS[3]	Daily Vol[1]	Daily Vol[1]	V/C[2]	LOS[3]		
North Iris Lane:											
Village Road to Robin Hill Lane	2-Lane Local Collector	15,000	8,466	0.564	C	228	8,694	0.580	C	0.015	No
Robin Hill Lane to Centre City Parkway	2-Lane Local Collector	10,000	8,996	0.900	E	588	9,584	0.958	E	0.059	Yes

Source: LOS Engineering 2022.
Notes: [1] Daily volume is a 24 hour volume.
[2] V/C: Volume to Capacity Ratio.
[3] LOS: Level of Service.
[4] Δ denotes the change in V/C ratio due to project.

Implementation of project improvements and compliance with regulatory requirements, as detailed at the beginning of Section 3.15.4, will improve the segment operations on North Iris Lane from Robin Hill Lane to Centre City Parkway from LOS E to LOS C. The v/c would go from 0.958 under the without improvement condition to 0.639 under the improved condition. Therefore, impacts would be **less than significant** in the existing plus project condition.

Local Transportation Analysis of Near Term Cumulative Conditions

Based on a review of City of Escondido on-line cumulative projects the following cumulative projects were determined to add traffic to the study area. The following cumulative projects (referenced by city map # included in Appendix I of the Transportation Study, Appendix K of this document) were included in this analysis.

- City Map #29: Escondido Country Club – The Villages. A mixed-use project with 392 single family homes, recreational amenities, and an urban farm generally located north of El Norte Parkway, west of I-15, along on both side of Country Club Lane.
- City Map #109 & 136: Nutmeg Residences (137 townhomes and 97 single family homes) generally located on the southwest corner of Centre City Parkway at Nutmeg Street.
- City Map #130: Assisted Living Residences (96 bed residential care facility) generally located on the east side of Centre City Parkway south of Iris Lane.

Near Term Without Project

Near Term (existing plus cumulative) describes the anticipated roadway operations with the completion of the cumulative projects. The LOS calculated for the study intersections and segments are included in **Tables 3.15-10 and 3.15-11**. Under Near Term conditions, the study intersections and segments were calculated to operate at LOS D or better except for North Iris Lane from Robin Hill Lane to Centre City Parkway (LOS E). Also, there is a long westbound left turn queue from North Iris Lane to Centre City Parkway.

Table 3.15-10. Near Term Without Project Intersection Level of Service

Intersection	Control Type	Movement	Study Period	Existing		Near Term (Existing + Cumulative)	
				Delay(1)	LOS(2)	Delay (1)	LOS(2)
N. Iris Lane at Village Road	Unsignalized	All	AM	10.3	B	10.3	B
		All	PM	17.6	C	17.7	C
N. Iris Lane at Robin Hill Lane	Unsignalized	EB	AM	11.5	B	11.5	B
		EB	PM	9.6	A	9.6	A
N. Iris Lane at Iris Glen	Unsignalized	EB	AM	0.0	A	0.0	A
		WB	AM	14.3	B	14.3	B
		EB	PM	0.0	A	0.0	A

Intersection	Control Type	Movement	Study Period	Existing		Near Term (Existing + Cumulative)	
				Delay(1)	LOS(2)	Delay (1)	LOS(2)
		WB	PM	18.4	C	18.5	C
Centre City Parkway at Iris Lane	Signalized	All	AM	36.2	D	36.9	D
		All	PM	22.8	C	22.9	C

Source: LOS Engineering 2022.
Notes: (1) Average Delay expressed in seconds per vehicle. (2) Level of Service.

Table 3.15-11. Near Term Without Project Segment Volumes and Level of Service

Roadway Segment	General Plan Classification	Capacity (LOS E)	Existing			Cumulative	Near Term (Existing + Cumulative)		
			Daily Vol(1)	V/C(2)	LOS(3)	Daily Vol1)	Daily Vol1)	V/C(2)	LOS(3)
North Iris Lane:									
Village Road to Robin Hill Lane	2-Lane Local Collector	15,000	8,466	0.564	C	12	8,478	0.565	C
Robin Hill Lane to Centre City Parkway	2-Lane Local Collector	10,000	8,996	0.900	E	12	9,008	0. 0.901	E

Source: LOS Engineering 2022.
Notes: (1) Daily volume is a 24 hour volume.
(2) V/C: Volume to Capacity Ratio.
(3) LOS: Level of Service.

Near Term Plus Project Conditions

The Near Term Plus Project condition describes the anticipated roadway operations with the addition of project traffic. The LOS calculated for the study intersections and segments are included in **Tables 3.15-12 and 3.15-13.** Under Near Term Plus Project conditions, the study intersections and segments were calculated to operate at LOS D or better except for North Iris Lane from Robin Hill Lane to Centre City Parkway (LOS E). There is a calculated project traffic effect along the segment of North Iris Lane from Robin Hill Lane to Centre City Parkway. Additionally, the project will add traffic to the westbound left turn queue from North Iris Lane to Centre City Parkway.

Table 3.15-12. Near Term Plus Project Intersection Level of Service

Intersection	Control Type	Movement	Study Period	Near Term (E+C)		Near Term + Project		Δ(3)	Project Effect?
				Delay(1)	LOS(2)	Delay (1)	LOS(2)		
N. Iris Lane at Village Road	Unsignalized	All	AM	10.3	B	10.5	B	0.2	No
		All	PM	17.7	C	19.5	C	1.8	No

Intersection	Control Type	Movement	Study Period	Near Term (E+C)		Near Term + Project		Δ(3)	Project Effect?
				Delay(1)	LOS(2)	Delay (1)	LOS(2)		
N. Iris Lane at Robin Hill Lane	Unsignalized	EB	AM	11.5	B	12.8	B	1.3	No
		EB	PM	9.6	A	12.6	B	3.0	No
N. Iris Lane at Iris Glen	Unsignalized	EB	AM	0.0	A	12.5	B	12.5	No
		WB	AM	14.3	B	15.3	C	1.0	No
		EB	PM	0.0	A	11.2	B	11.2	No
		WB	PM	18.5	C	19.9	C	1.4	No
Centre City Parkway at Iris Lane	Signalized	All	AM	36.9	D	37.3	D	0.4	No
		All	PM	22.9	C	23.7	C	1.0	No

Source: LOS Engineering 2022.
Notes: (1) Average Delay expressed in seconds per vehicle.
(2) Level of Service.
(3) Δ denotes the increase in delay due to project.

Table 3.15-13. Near Term Plus Project Segment Volumes and Level of Service

Roadway Segment	General Plan Classification	Capacity (LOS E)	Near Term (E+C)			Project	Near Term + Project			Δ(4)	Project Effect?
			Daily Vol(1)	V/C(2)	LOS(3)	Daily Vol1)	Daily Vol1)	V/C(2)	LOS(3)		
North Iris Lane:											
Village Road to Robin Hill Lane	2-Lane Local Collector	15,000	8,478	0.565	C	228	8,706	0.580	C	0.015	No
Robin Hill Lane to Centre City Parkway	2-Lane Local Collector	10,000	9,008	0.901	E	588	9,596	0.640	E	0.059	Yes

Source: LOS Engineering 2022.
Notes: (1) Daily volume is a 24 hour volume.
(2) V/C: Volume to Capacity Ratio.
(3) LOS: Level of Service.
(4) Δ denotes the change in V/C ratio due to project.

Implementation of project improvements and compliance with regulatory requirements, as detailed at the beginning of Section 3.15.4, will improve the segment operations on North Iris Lane from Robin Hill Lane to Centre City Parkway from LOS E to LOS C. The v/c would go from 0.960 under the without improvement condition to 0.640 under the improved condition. Impacts would be **less than significant** in the Near Term Plus Project conditions.

Local Transportation Analysis of Long Term Year 2035 Conditions

The year 2035 is used for the long-term conditions in order to match the City's General Plan long term scenario. Long Term Year 2035 conditions were analyzed using volumes from City of Escondido General Plan, May 2012 and SANDAG Series 14 Horizon Year Volumes.

Additionally, growth factors (described below) were used to forecast volumes that were not included in the above sources. The intersection year 2035 volumes sources or factoring included:

- North Iris Lane/Village Road (2.2% growth factor, described below)
- North Iris Lane/Robin Hill Lane (2.2% growth factor)
- North Iris Lane/Iris Glen (2.2% growth factor to north and south through movements, no growth on minor legs that serve Meadowbrook Village and the proposed North Iris Project)
- Centre City Parkway/Iris Lane (27.9% growth factor described below for north and south through movements on Centre City Parkway and 2.2% on remaining movements because there is significantly less forecasted growth based on SANDAG forecasts on the minor street movements)

The segment year 2035 volume sources for factoring included:

- North Iris Lane from Village Road to Robin Hill Lane (SANDAG year 2050 volume)
- North Iris Lane from Robin Hill Lane to Centre City Parkway (SANDAG year 2050 volume)

The 2.2% growth factor was calculated from the percent increase on North Iris Lane between a year 2018 ADT of 8,996 and a year 2050 ADT of 9,200 from the SANDAG Series 14 model. The SANDAG year 2050 volume of 9,200 ADT was applied for North Iris Lane because the City's General Plan Update had a year 2035 volume of 8,400 ADT, which was lower than the year 2018 volume of 8,996 ADT.

At Centre City Parkway/Iris Lane, a 27.9% growth factor for northbound and southbound through movements was applied and a 2.2% growth factor on remaining movements was applied. The 2.2% represents the adjacent parcels served by Iris Lane and not the high through movements along Centre City Parkway. Hence, the application of 2.2% to all intersection movements on North Iris Lane at Village Road and at Robin Hill Lane is appropriate.

The LOS calculated for the study intersections and segments under Long Term Year 2035 and Long Term Year 2035 with Project conditions are included in **Tables 3.15-14 and 3.15-15.** Under both conditions (Long Term Year 2035 and Long Term Year 2035 plus project) the study intersections and segments were calculated to operate at LOS D or better except for North Iris Lane from Robin Hill Lane to Centre City Parkway (LOS E). Also, there is a long westbound left turn queue from North Iris Lane to Centre City Parkway.

Table 3.15-14. Long Term Year 2035 Plus Project Intersection Level of Service

Intersection	Control Type	Movement	Study Period	Year 2035		Year 2035 + Project		Δ(3)	Project Effect?
				Delay(1)	LOS(2)	Delay (1)	LOS(2)		
	Unsignalized	All	AM	10.5	B	10.6	B	0.1	No

Intersection	Control Type	Movement	Study Period	Year 2035		Year 2035 + Project		Δ(3)	Project Effect?
				Delay(1)	LOS(2)	Delay (1)	LOS(2)		
N. Iris Lane at Village Road		All	PM	18.7	C	20.8	C	2.1	No
N. Iris Lane at Robin Hill Lane	Unsignalized	EB	AM	11.6	B	12.9	B	1.3	No
		EB	PM	9.6	A	12.7	B	3.1	No
N. Iris Lane at Iris Glen	Unsignalized	EB	AM	0.0	A	12.6	B	12.6	No
		WB	AM	14.6	B	15.6	C	1.0	No
		EB	PM	0.0	A	11.3	B	11.3	No
		WB	PM	18.8	C	20.4	C	1.6	No
Centre City Parkway at Iris Lane	Signalized	All	AM	42.5	D	43.4	D	0.9	No
		All	PM	23.5	C	24.6	C	1.1	No

Source: LOS Engineering 2022.
Notes: (1) Average Delay expressed in seconds per vehicle.
(2) Level of Service.
(3) Δ denotes the increase in delay due to project.

Table 3.15-15. Long Term Year 2035 Plus Project Segment Volumes and Level of Service

Roadway Segment	General Plan Classification	Capacity (LOS E)	Year 2035			Project	Year 2035 + Project			Δ(4)	Project Effect?
			Daily Vol(1)	V/C(2)	LOS(3)	Daily Vol1)	Daily Vol1)	V/C(2)	LOS(3)		
North Iris Lane:											
Village Road to Robin Hill Lane	2-Lane Local Collector	15,000	9,200	0.613	C	228	9,428	0.629	C	0.015	No
Robin Hill Lane to Centre City Parkway	2-Lane Local Collector	10,000	9,200	0.920	E	588	9,788	0.979	E	0.059	Yes

Source: LOS Engineering 2022.
Notes: (1) Daily volume is a 24 hour volume. (2) V/C: Volume to Capacity Ratio.
(2) LOS: Level of Service. (4) Δ denotes the change in V/C ratio due to project

Implementation of project improvements and compliance with regulatory requirements, as detailed at the beginning of Section 3.15.4, will improve the segment operations on North Iris Lane from Robin Hill Lane to Centre City Parkway from LOS E to LOS C. The v/c would go from 0.979 under the without improvement condition to 0.653 under the improved condition. Impacts would be **less than significant** in the Long Term Year 2035 condition.

In summary, implementation of the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts to the circulation system would be **less than significant.**

3.15.4.2 Vehicle Miles Traveled

Threshold #2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b);

The City of Escondido *Transportation Impact Analysis Guidelines* (TIAG) dated April 21, 2021 provides a comprehensive manual for the CEQA VMT significance criteria.

VMT Significant Impact Thresholds

As described above in Section 3.15.2.3. significance thresholds for transportation VMT impacts are based on the project type. For residential projects, the appropriate metric is VMT/capita. As shown in **Table 3.15-16**, a significant impact would occur if the project generates a VMT per capita that exceeds a level of 15 percent below the existing regional average.

Table 3.15-16. City of Escondido Project Thresholds for VMT Transportation Impacts

Project Type	Metric	Significance Threshold
Residential	VMT/Capita	15% below regional average

Source: City of Escondido *Transportation Impact Analysis Guidelines* (April 2021)

VMT Analysis

According to SANDAG, the regional average baseline VMT per resident is 18.9 miles per resident (LOS Engineering 2022). For the purposes of determining the significance of VMT impacts, the project VMT per capita would need to be 15% below the regional average, which equates to 16.07 VMT per capita.

The project VMT per Capita by Census Tract was obtained from the SANDAG ABM2+ Base Year 2016 screening map. The project is located within census tract 201.05, which has an existing VMT per capita of 18.4. Therefore, the project is expected to have similar VMT characteristics of the census tract, which is 97.3% of the regional mean of 18.9 This represents a **significant impact (Impact TR-1)** and mitigation is required.

- **Impact TR-1** The project's per capita VMT exceeds the significance threshold of 15% below regional average.

3.15.4.3 Traffic Hazards

Threshold #3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Access to the project site will be via one 36-foot wide driveway on Robin Hill Lane which will provide a private gated circular bulb turnaround entry with access to ingress and egress. A 24-foot wide gated secondary exit-only driveway would be provided at the eastern boundary of the project site to connect with North Iris Lane.

The internal circulation network does not include any hazardous design features or propose any incompatible uses. As described in EIR Section 2.5.4, the proposed project's internal circulation is via

private driveways and alleys to access the residential units. In addition, the project provides an accessible path of travel through the site and to each residence via pedestrian pathways. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles.

As such, because the proposed project would not include any hazardous design features or any incompatible uses, and because the project would be designed to provide safe movement throughout and around the project site, impacts would be **less than significant.**

3.15.4.4 Emergency Access

Threshold #4: Result in inadequate emergency access.

The project has been designed to incorporate a 24-foot wide gated secondary exit-only driveway at the eastern boundary of the project site to connect with North Iris Lane. The internal drive aisle and project design provides adequate width and vertical clearance to accommodate fire trucks and emergency response vehicles. Additionally, the project design has also been reviewed by the Fire Marshal and no issues related to inadequate emergency access were identified. Impacts related to emergency access would be **less than significant**.

3.15.5 Cumulative Impact Analysis

The geographic scope of cumulative impacts for traffic includes the study area evaluated in the Vehicle Miles Traveled and Local Mobility Analysis Report (Appendix K).

Conflicts with Policies Addressing Circulation System

As discussed in Section 3.15.4.1, the project would not impact any existing built out pedestrian, bicycle and transit facilities in the project vicinity. As part of the project, the applicant will install sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 ft). These improvements will complete a missing section of sidewalk thus improving pedestrian network connectivity for the neighborhood. Additionally, as part of the project, the applicant will install Class III bike markings along the project's frontage on North Iris Lane. No cumulative impacts to pedestrian, bicycle and transit facilities would occur with implementation of the proposed project.

Section 3.15.4.1. includes an analysis of cumulative impacts for Near Term and Long Term Year 2035 conditions. The near term analysis includes the addition of traffic from three cumulative projects, including Escondido Country Club, The Villages, Nutmeg Residences and Assisted Living Residences. As shown in Tables 3.15-10 through 3.15-13, under Near Term Without and With Project conditions, the study intersections and segments were calculated to operate at LOS D or better with the exception of the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway. Implementation of project design features and regulatory compliance requirements will reduce the project's effect on this segment.

Long Term Year 2035 conditions were analyzed using volumes from the City's General Plan and SANDAG horizon year volumes. Additionally, growth factors were used to forecast volumes that were not included in the City or SANDAG volumes. As shown in Table 3.15-15, under Long Term Year 2035 Without and With Project conditions, the study intersections and segments were calculated to operate at LOS D or better with the exception of the segment of North Iris Lane from Robin Hill Lane to City

Centre Parkway. Implementation of project design features and regulatory compliance requirements will reduce the project's effect on this segment.

In summary, implementation of the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, cumulative impacts to the circulation system would be **less than significant.**

Vehicle Miles Traveled

VMT generated by the project will be 97.3% of the regional mean. A VMT of 85 % of the regional mean is the threshold for significance. Therefore, the project would have a significant VMT impact. Implementation of mitigation measure MM-TR-1a and MM-TR1b will reduce the impact to below a level of significance. These mitigation measures, which include increasing residential density on the project site and contributing fees for pedestrian safety improvements at five intersections in the City will reduce the VMT to 84.4% of the regional mean and will reduce VMT impacts to below a level of significance and cumulative VMT impacts would also be **reduced to below a level of significance**.

Traffic Hazards

Because the proposed project would not include any hazardous design features or any incompatible uses, and because the project would be designed to provide safe movement throughout and around the project site, cumulative impacts related to traffic hazards would be **less than significant.**

Emergency Access

The proposed project would provide adequate emergency access and would not contribute to a cumulative emergency access impact. No cumulative emergency access impact would occur with implementation of the proposed project.

3.15.6 Mitigation Measures

Implementation of the following mitigation measures would be required as a condition of project approval:

- **Impact TR-1 Vehicle Miles Traveled**

MM-TR-1a The project shall implement CAPCOA reduction measure T-1 (Increase Residential Density).

MM-TR—1b The project applicant shall pay the City of Escondido $67,500 for pedestrian improvements at the following five intersections to reduce VMT impacts:

- Intersection of Centre City Pkwy at Iris Lane (Install high-visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of El Norte at South Iris Lane (Install high-visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).

- Intersection of Broadway at Vista Ave (Install high-visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of El Norte Parkway at Mountain View (Install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of Country Club Lane at Broadway (Install high visibility crosswalk on north, south and east legs (3 crosswalks).

3.15.7 Conclusion

Conflicts with Policies Addressing Circulation System

The project would not result in any impact to existing built out pedestrian, bicycle or transit facilities in the project vicinity. However, the applicant will be completing half street improvements along the project frontage on North Iris Lane and on Robin Hill Lane that will improve pedestrian network connectivity for the neighborhood.

The project results in traffic effects under Existing, Near Term or Long Term Year 2035 conditions on the segment of North Iris Lane from Robin Hill Lane to City Centre Parkway (LOS E). Implementation of project design features and regulatory compliance measures, as detailed at the beginning of Section 3.15.4 will improve operations of this segment to LOS C.

In summary, implementation of the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts to the circulation system would be **less than significant.**

Vehicle Miles Traveled

VMT generated by the project will be 97.3% of the regional mean. A VMT of 85 % of the regional mean is the threshold for significance. Therefore, the project would have a significant VMT impact. Implementation of mitigation measure MM-TR-1a and MM-TR1b will reduce the impact to below a level of significance.

Mitigation measure MM-TR-1a is the implementation of CAPCOA VMT reduction measure T-1 (Increase Residential Density) as detailed in the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (December 2021) (CAPCOA GHG Handbook). CAPCOA VMT reduction measure T-1 is calculated based on the number of housing units per acre. The project proposes a density of 13.2 dwelling units per acre. T-1 requirements state that this measure is most accurately quantified when applied to larger developments and/or developments where the density if somewhat similar to the surrounding neighborhood. CAPCOA VMT reduction measures T-1 also defines key variables for residential density to use acres of developed land, not including streets, school sites, parks, and other undevelopable land. The SANDAG Master Geographic Reference Area (MGRA) density, with streets and other undevelopable land removed, results in a surrounding residential density of 10.6 dwelling units per acre as detailed in Appendix C of the traffic study (Appendix K of the EIR). The project, which proposes 13.2 du/ac, is similar to the surrounding neighborhood density of 10.6 du/ac. Through application of this measure, project VMT is reduced by 5.4%. The project's VMT per capita after application of MM-TR-1a is 91.9%. Implementation of mitigation measure MM-TR-1b provides further VMT reductions.

The City has pedestrian VMT reductions that are based on CAPCOA's T-18 (Pedestrian Network Improvements). Providing sidewalks and an enhanced pedestrian networks encourages people to walk instead of driving. Such pedestrian network enhancements could include:

- Bus Stop Shelters
- High-Visibility Crosswalks
- Pedestrian Hybrid Beacons
- Pedestrian Signals
- Mid-Block Crossing Walks
- Pedestrian Refuge Islands
- Speed Tables
- Bulb-Outs (curb extensions)
- Curb Ramps (on all corners of an intersection)
- Roundabouts
- Mini-Circles
- Pedestrian-Only Connections and Districts
- Planter Strips with Street Trees (minimum 1 mile)

The City established a reduction of up to 60 VMT per improvements per intersection based on an estimated number of new walking trips resulting from improved pedestrian experience using the CAPCOA VMT reduction measures as a starting point.

The methodology for the VMT reductions is based upon guidance in the CAPCOA GHG Handbook and engineering judgement. Improvements at an intersection are estimated to convert up to 25 short vehicle trips to walking trips per day. The average walking trip length is 0.6 miles one-way (based upon the CAPCOA GHG Handbook) or 1.2 miles round-trip. Therefore, 25 additional walking trips reduced VMT by 30 VMT per pedestrian movement (1.2 miles X 25 walking trips). Complete details on the methodology for the VMT reduction due to pedestrian improvements at the intersections is included in Appendix C of the traffic study (Appendix K of the EIR).

Mitigation measure MM-TR-1b requires the project applicant to pay the City of Escondido $67,500 for pedestrian improvements at five intersections. **Table 3.15-17** summarizes the improvements, City cost estimate and the anticipated VMT reductions for each improvement. The improvements at the five intersections result in a reduction of 465 VMT.

Table 3.15-17. VMT Reductions For Pedestrian Improvements

Intersection	Improvements	City Cost Estimate	VMT Reduction
Centre City Parkway at Iris Lane	Four High-Visibility Crosswalks	$16,000	60 VMT
	Countdown pedestrian heads 1 intersection upgrade		60 VMT
El Norte at South Iris Lane	Four High-Visibility Crosswalks	$14,400	60 VMT

Intersection	Improvements	City Cost Estimate	VMT Reduction
	Countdown pedestrian heads 1 intersection upgrade		60 VMT
Broadway at Vista Avenue	Four High-Visibility Crosswalks	$26,000	60 VMT
	Countdown pedestrian heads 1 intersection upgrade		60 VMT
El Norte at Mountain View	Countdown pedestrian heads 1 intersection upgrade	$4,000	60 VMT
Country Club at Broadway	Three High-Visibility Crosswalks	$7,500	45 VMT
	Totals	**$67,500**	**465 VMT**

Source: LOS Engineering 2022.

As shown in **Table 3.15-18**, with implementation of the proposed mitigation measures, the final project VMT is 84.4% which is less than the 85th percentile regional mean and transportation-related VMT impacts would be **reduced to below a level of significance**.

Table 3.15-18. Project VMT Mitigation Results

Project Number of Dwelling Units	SANDAG Avg Household Size Person/Unit	Persons	Project VMT/ Capita	Project VMT	Mean VMT/ Capita	Percent of Mean
SANDAG Screenline Map VMT Percent of Mean and Project VMT						
102	3.2	326.4	18.40	6,006	18.9	97.3%
CAPCOA T-1 Increase Residential Density VMT % Reduction:						-5.4%
102	3.2	326.4	17.37	5,669	18.9	91.9%
85th Percentile Project VMT						
102	3.2	326.4	16.07	5,244	18.9	85.0%
Required VMT Reduction after CAPCOA On-Site Mitigation =				*426*		
City VMT Exchange Program Reduction Measures				Reduction		
Centre City Pkwy/Iris Ln (HVC & count down ped timers)				-120		
El Norte/S. Iris Ln (HVC & count down ped timers)				-120		
Broadway/Vista Ave (HVC & count down ped timers)				-120		
El Norte/Mountain View (count down ped timers)				-60		
Country Club at Broadway (HVC)				-45		
			VMT Reduction	-465		
			Mitigation reduces VMT by at least 426?	Yes		
Project Final VMT after CAPCOA T-1 mitigation (5,669-465) =				**5,204**		**84.4%**

Dec 2021 CAPCOA, City 2022 VMT Reduction Options. Persons/Unit from SANDAG. HVC: High Visibility Crosswalks

Source: LOS Engineering 2022.

In addition to the proposed VMT mitigation measures, the project applicant proposes to implement Transportation Demand Management (TDM) strategies to further reduce single occupant vehicle use through promoting alternative modes of transportation. The following TDM plan will provide the means to disseminate information to residents to learn about and use alternative forms of transportation

other than single occupancy vehicles. The following TDM elements (to be implemented by the developer at the time of product sales) will be provided during the sales phase and will be incorporated into the project conditions of approval.

- Provide information about SANDAG's iCommute program to encourage carpooling.
- Provide information about maps, routes, and schedules for public transit.

The project will also construct sidewalks along the project frontage on North Iris Lane and the frontage on Robin Hill Lane.

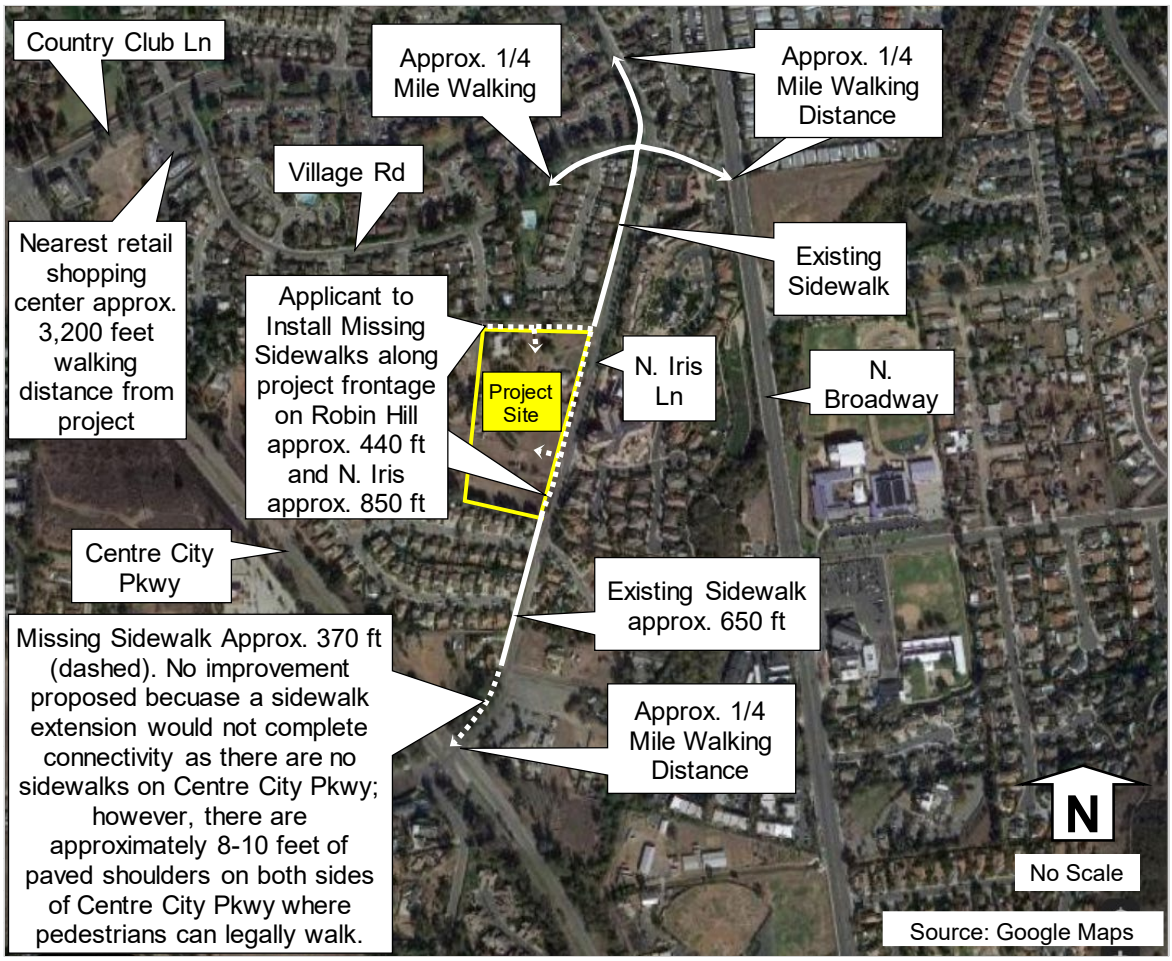
Traffic Hazards

Project impacts related to hazards due to a design feature or incompatible use were determined to be **less than significant.**

Emergency Access

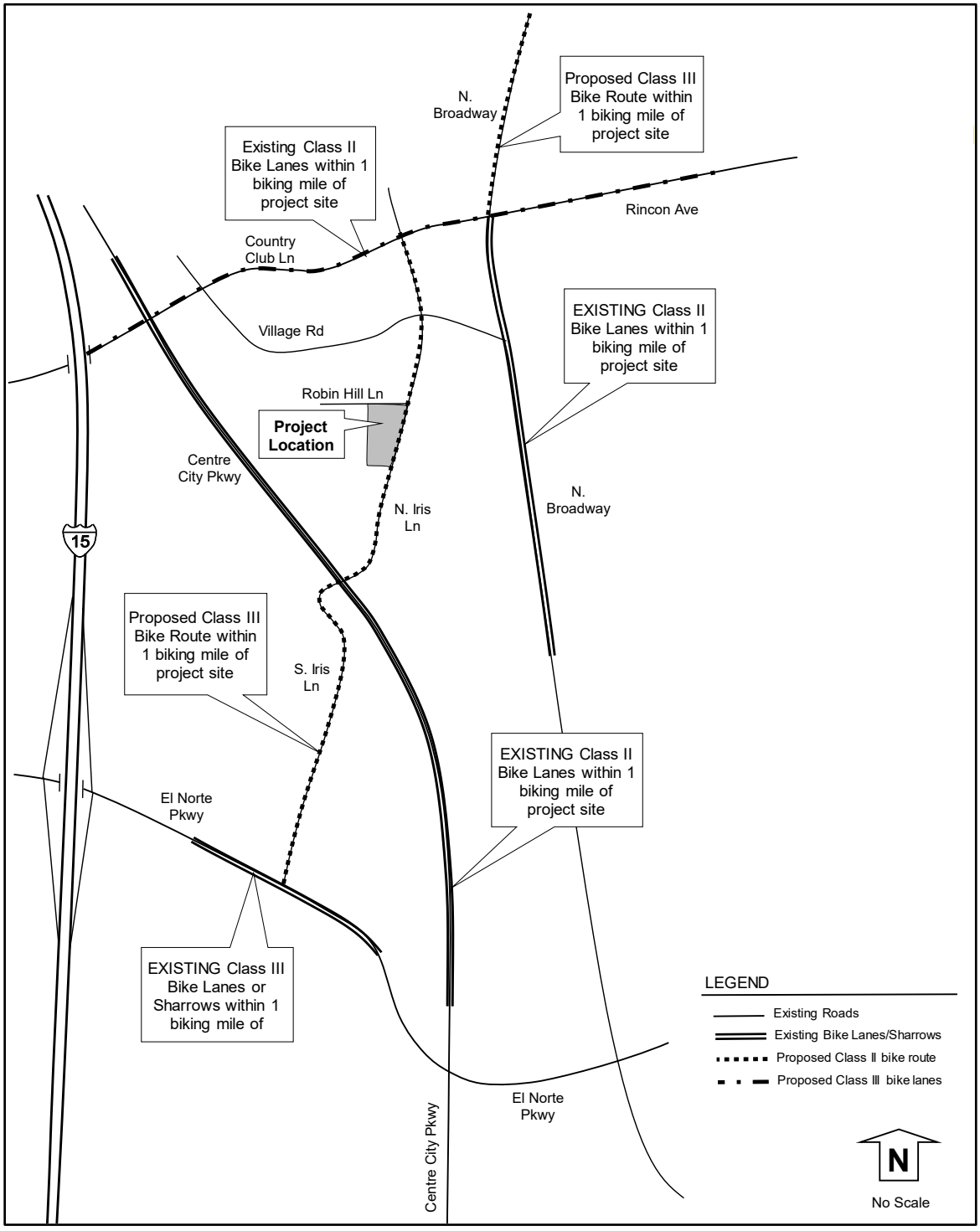
Project impacts related to hazards due to a design feature or incompatible use or inadequate emergency access were determined to be **less than significant.**

Figure 3.15-1. Pedestrian Facilities in Project Vicinity



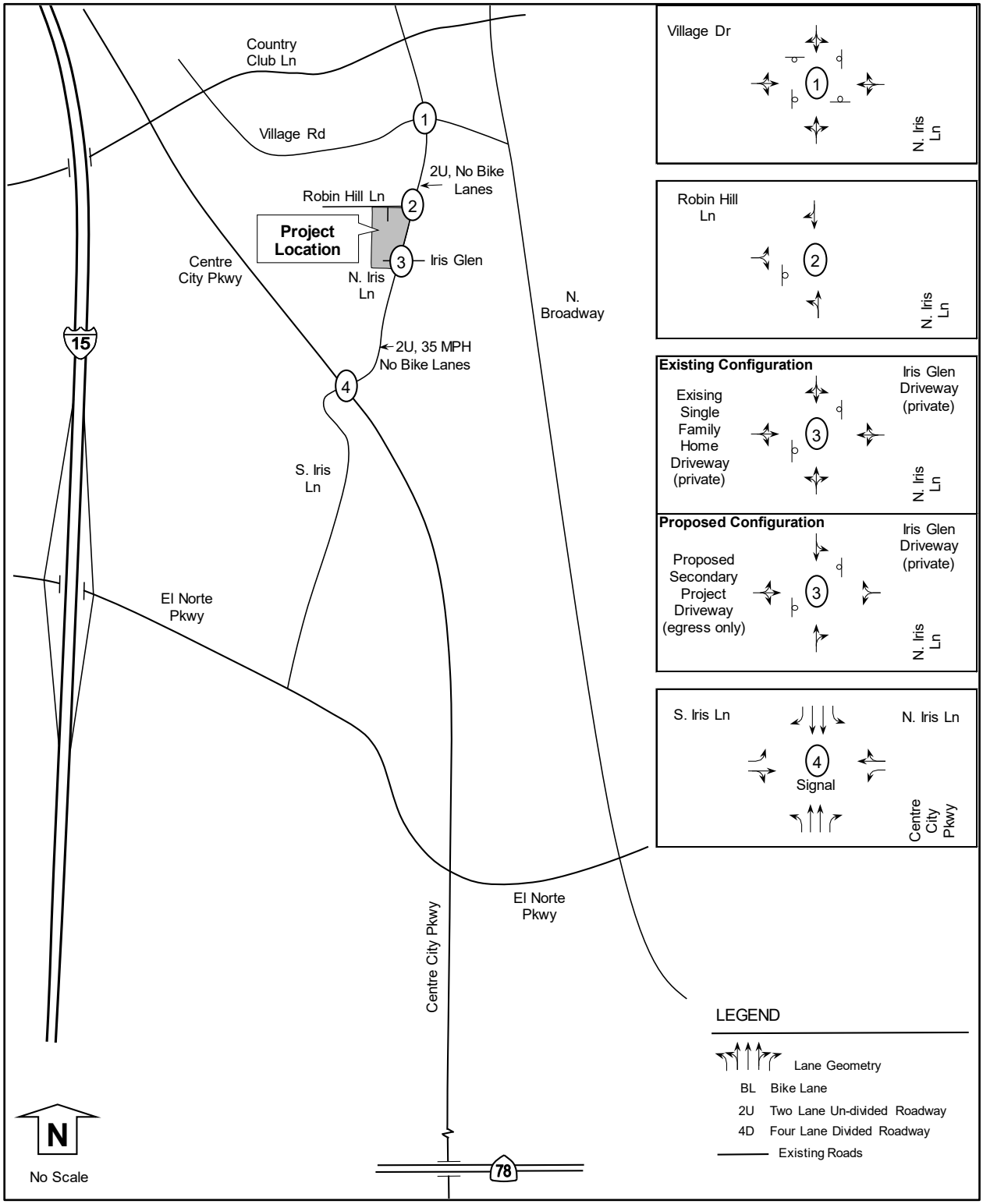
Source: LOS Engineering 2022.

Figure 3.15-2. Existing and Proposed Bicycle Facilities Within 1-Mile of Project Site



Source: LOS Engineering 2022.

Figure 3.15-3. Existing Roadway Conditions



Source: LOS Engineering 2022.

3.16 Utilities and Service Systems

This section analyzes the potential impact of the proposed project on utilities and service systems including water, wastewater, stormwater, electricity, natural gas and solid waste. Please see Section 3.13, Public Services, for an analysis of police, fire, school and library services. The analysis also considers the California Environmental Quality Act (CEQA) Guidelines Appendix G and applicable State and Local regulations, including the City of Escondido General Plan.

3.16.1 Existing Conditions

The following provides background information about the water, wastewater, solid waste and other utility service providers that will serve the proposed project. It references applicable water and wastewater agency planning documents.

Water Service

The project site lies within Rincon Del Diablo Municipal Water District (RDDMWD) Improvement District 1 service area. RDDMWD currently serves the four residences on the project and would serve the proposed project.

RDDMWD supplies potable and recycled water to a population of 30,000 people through nearly 8,000 connections representing residential, agricultural, landscape, and commercial/industrial water uses. RDDMWD's service area includes the Cities of Escondido, San Marcos, and San Diego, and various unincorporated areas of San Diego County.

RDDMWD serves two distinct geographical areas, both of which have different potable water portfolios. These geographical areas are delineated as Improvement District 1 (ID 1) and Improvement District A (ID A). The project site is located within ID 1 (RDDMWD 2022). ID-1 is the largest of the two improvement districts, containing approximately 85 percent of the District's total active service land area (7,945 acres), and approximately 90 percent of its population. The land area of ID-1 is approximately evenly split between the City of Escondido and unincorporated County areas, and is dominated by residential, rural residential and agricultural land uses (RDDMWD 2014). In fiscal year 2015, there were 6,814 municipal connections and 4,720-acre feet (AF) supplied.

Although RDDMWD provides recycled water to its customers for landscape and irrigation use, RDDMWD does not currently operate a wastewater collection or treatment system but rather purchases treated water from the City of Escondido's Hale Avenue Resource Recovery Facility (HARRF) (RDDMWD 2021).

Water Supply

RDDMWD is a member of the San Diego County Water Authority (SDCWA), thus eligible to purchase water transported into San Diego County via the massive aqueducts of SDCWA and its wholesaler, Metropolitan Water District (MWD) of Southern California. To understand water supply availability for the proposed project, it is important to begin with MWD and follow the water supply through these agencies.

Metropolitan Water District

MWD was formed in 1928 to develop, store and distribute supplemental water to southern California for domestic and municipal purposes. MWD consists of 26-member agencies and has a service area covering six counties, 5,200 square miles, and 19 million people. MWD obtains water from local sources as well as the Colorado River (via the Colorado River Aqueduct) and the Sacramento-San Joaquin Delta (via the State Water Project). MWD's 2020 Urban Water Management Plan (UWMP) documents the availability of these supplies to meet future demands. With a projected annual water demand of 4,929,000 acre feet per year (AFY) for 2025, the MWD 2020 UWMP concludes that, with implementation of their flexible Central Valley/SWP storage and transfer programs, MWD has supply capabilities sufficient to meet expected demands through 2045 under normal, single dry, and multiple dry water years (MWD 2021a).

In June 2021, MWD adopted it's 2020 Water Shortage Contingency Plan as part of the UWMP. The plan is a guide for MWD's intended actions during water shortage conditions meant to improve preparedness for droughts and other impacts on water supplies by describing the process used to address varying degrees of water shortages. Potential shortage response actions include supply augmentation actions, demand reduction actions, operational changes, and additional mandatory prohibitions (MWD 2021b).

San Diego County Water Authority

SDCWA is the largest member agency of MWD. SDCWA was established in 1943, and, according to its 2020 UWMP, supplies 75 to 95 percent of the water needs in San Diego County through five major pipelines (SDCWA 2021). SDCWA's service area covers 1,486 square miles and a population of 3.3 million. The 2020 UWMP identifies a diverse mix of water resources planned to be developed over the next 25 years to ensure that the region has enough water to meet its needs, including during drought periods. Annual water demand as of 2020 was 463,128 AFY. By 2045, total normal water demands are projected to reach 630,771 AF (including future conservation, demand associated with projected near-term annexations, and accelerated forecasted growth). By comparison, in fiscal year 2007, water demand in SDCWA's service area reached a record level of 741,893 AF. The drop in water demand since 2007 is attributable to a combination of factors, including above-average rainfall in four of the last five fiscal years, continuing conservation efforts, a growing water use efficiency ethic, and consumer price response to the retail cost of water (SDCWA 2021a).

Historically, SDCWA has relied solely on imported water supplies purchased from the MWD to meet the needs of its member agencies. As discussed above, MWD's 2020 UWMP report states that MWD is capable of meeting expected demands for its member agencies under normal and dry year conditions through 2045. After experiencing severe shortages from MWD during the 1987 to 1992 drought, SDCWA began methodically pursuing actions to diversify the region's supply sources, including a Water Conservation and Transfer agreement with Imperial Irrigation District (IID), a Water Purchase Agreement with Poseidon Water for purchase of desalinated ocean water produced at the Carlsbad Desalination Plant, and investments in carryover storage supplies to help achieve reliability in dry years. SDCWA's carryover storage supply program includes both in-region water storage and out-of-region groundwater storage in California's Central Valley. Additionally, local water resources developed and managed by the SDCWA's member agencies are critical to securing a diverse and reliable water supply for the region. Local projects reduce demands for imported water and provide member agencies with a drought-resilient supply. These supplies include surface water, groundwater, recycled water, potable reuse, desalinated seawater, and water transfers. The SDCWA 2020 UWMP presents the SDCWA's water reliability assessments from 2025 through 2045. The reliability

assessment results demonstrate that, even when making conservative assumptions about the availability of dry year supplies from MWD, the San Diego region's water resource mix is drought resilient (SDCWA 2021a).

In May 2021, SDCWA adopted it's 2020 Water Shortage Contingency Plan as part of the UWMP. In times of potential water supply shortages, the plan provides guidance on potential regional actions to lessen the existing or future severity of water supply shortages. To determine the specific actions that should be taken at each level, SDCWA and its member agencies will evaluate conditions specific to the timing, supply availability, and cost, along with other pertinent variables. Numerous variables can influence the supply reduction levels during a water supply shortage. These variables include, but are not limited to, SWP allocation, conditions on the Colorado River, Water Authority supplies, local storage, local demands, and timing. Member agencies will independently adopt retail-level actions to manage potential water supply shortages. Potential shortage response actions include ongoing water use efficiency, communication plan, supply augmentation, extraordinary demand reduction measures and member agency municipal and industrial supply allocation (SDCWA 2021b).

Rincon Del Diablo Water District

RDDMWD currently imports most of its potable, treated water from SDCWA, particularly from the SDCWA First Aqueduct (which completed major rehabilitation in January 2021), and all of its recycled water from the City of Escondido's HARRF. In previous years, the Rincon ID 1 water delivery system consisted only of 100% imported water purchased from the SDCWA. Since 2016, ID 1 water supplies are augmented from time-to-time with water originating from the Twin Oaks Valley Water Treatment Plant (TOVWTP). TOVWTP water is a blend of treated SDCWA water and desalinated sea water from the Claude "Bud" Lewis Carlsbad Desalination Plant (Lewis Desal Plant). Originating from the Carlsbad Agua Hedionda Lagoon, the desalinated water is a superior quality water – free of salt as well as biological and organic compounds (RDDMWD 2020a).

Per the RDDMWD 2020 UWMP, in 2020 total demand for potable and non-potable water was 4,630 AFY. It should be noted water demands for 2020 were significantly less than those projected in the 2015 UWMP of 7,668 AF in 2020. This variance was due to continued and permanent response to earlier mandatory water use restrictions in response to the State Water Resources Control Board's (SWRCB) emergency drought regulations (RDDMWD 2021).

RDDMWD has estimated that future demands will increase at the same rate as the SANDAG-projected population growth rate for RDDMWD's service area and generally maintain the same user type profile. Potential annexations (24 AFY in 2025) are listed in addition to the population-based demand projections to ensure that adequate water is available for these additional customers. Table 3.16-1 below shows projected water demands for the years 2025-2045 as reported in the 2020 UWMP.

As part of its UWMP, RDDMWD must demonstrate that it can reliably meet current and future water demands. According to the UWMP, RDDMWD's water supplies for 2020 totaled 6,617 acre-feet. Table 3.16-2 shows projected water supplies through 2045. The projections reflect the RDDMWD goal to supply the growth in demand arising from new development. The UWMP confirmed that current and future water demands for RDDMWD customers can be met through 2045. This has additionally been confirmed in SDCWA's 2020 UWMP and MWD's 2020 UWMP. The Water Reliability Assessment completed as part of the UWMP, concluded that RDDMWD is well-positioned to withstand the effects of a single dry year and a five-year drought at any period between 2025 and 2045. RDDMWD's drought risk was specifically assessed between 2021 and 2025, assuming that the next five years are dry

years. In each case, water supplies comfortably exceed water demands. This remains true whether the drought occurs in 2021, 2045, or any year between (RDDMWD 2021).

RDDMWD approved a Water Shortage Contingency Plan as part of its 2020 UWMP and is included as Appendix L in the UWMP (RDDMWD 2021). The plan includes their process for assessing potential gaps between planned water supply and demands for current year and the next potentially dry year. It aligned its water service area's water shortage levels with the State for consistent messaging and reporting and planned for locally appropriate water shortage responses. The Plan's shortage response actions consist of a combination of demand reduction, supply augmentation, and operational changes. RDDMWD's response actions are dependent on the event that precipitates a water shortage level, the time of the year the event occurs, the water supply sources available, and the condition of its water system infrastructure (RDDMWD 2021).

Table 3.16-1. RDDMWD Projected Potable and Non-Potable Water Demands in Acre Feet (1)

Water Use Sectors	2025	2030	2035	2040	2045
Single Family	3,658	3,946	3,993	3,985	4,015
Multi-Family	1,568	1,691	1,711	1,707	1,721
Commercial	691	760	836	919	1,011
Industrial	150	150	150	150	150
Institutional/ Governmental	200	220	242	266	293
Landscape	350	333	316	300	285
Agricultural Irrigation	31	29	28	28	28
Other Annexations	24	24	24	24	24
Total	**6,672**	**7,153**	**7,300**	**7,379**	**7,527**

Source: 2020 Urban Water Management Plan (RDDMWD 2021).
Note: (1) Recycled water demands are not reported in this table.

Table 3.16-2. RDDMWD Projected Water Supply (Reasonably Available Volume in Acre Feet(1))

Water Supply Categories	Additional Detail on Water Supply	2025	2030	2035	2040	2045
Purchased or Imported Water	SDCWA Treated	6,672	7,153	7,300	7,379	7,527
Recycled Water	District- Harmony Grove WRF	220	220	220	220	220
Recycled Water	District – New Development	180	180	180	180	180
Recycled Water	City of Escondido HARRF	1,800	1,800	1,800	1,800	1,800
Total		**8,872**	**9,353**	**9,500**	**9,579**	**9,727**

Source: 2020 Urban Water Management Plan (RDDMWD 2021).

Note: (1) The reasonably available volume is an estimate of usage based on population projections provided by SANDAG and the projection of usage at 200 GPCD. Total Right or Safe Yield volumes can be found in *Table 6.8. Water Supplies – Projected* of the 2020 UWMP

California Drought Conditions

Significant recent droughts in California occurred in 1976-77, 1987-92, 2007-09, and most recently, December 2011 through March 2017 (PPIC 2021). In March 2015, during the last drought, California Governor Jerry Brown ordered mandatory water use reductions for the first time in California's history, saying the state's four-year drought had reached near-crisis proportions after a winter of record-low snowfalls. Governor Brown, in an executive order, directed the SWRCB to impose a 25 percent reduction on the state's 400 local water supply agencies, which serve 90 percent of California residents. The specifics for how to accomplish this reduction were left to the water agencies. (Nagourney 2015). On April 7, 2017, Governor Brown issued Executive Order B-40-17 rescinding emergency drought regulations in the state. RDDMWD customers cumulatively saved almost 29% since June 2015. RDDMWD lifted emergency regulations but remained in Level 1 promoting voluntary actions for water conservation (Thomas and Murtland 2017).

In April 2021, Governor Newsom declared another drought emergency. The declaration was originally limited to two counties in northern California, Sonoma and Mendocino. No mandatory water restrictions have been imposed (State of California Office of Governor Newsom April 2021a). On May 10, 2021, Governor Newsom expanded his drought emergency proclamation to include 39 more counties, but not San Diego County (State of California Office of Governor Newsom May 2021b). A September 2021 report from the California Department of Water Resources (DWR) said the 2021 water year, which runs from October through September was the driest since 1924. Just under 12 inches of rain and snow was measured and California typically receives an average of about 28 inches of rainfall (DWR 2021a). On October 19, 2021, Governor Newsom issued a proclamation extending the drought emergency statewide and encouraged Californians to increase their water conservation efforts as the western U.S. faces a potential third dry year. The proclamation added the eight counties not previously included in the drought state of emergency: Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego, San Francisco and Ventura. (State of California Office of Governor Newsom October 2021c).

In December 2021, DWR announced its initial SWP allocation for 2022 along with several steps to manage the state's water supply in anticipation of a third dry year with reservoirs at or near historic lows. Given the unprecedented drought conditions, the SWP's initial allocation for December 1 will focus on the health and safety needs for 2022 of the 29 water agencies that contract to receive SWP supplies. DWR has advised these water agencies to expect an initial allocation that prioritizes health and safety water needs and that the SWP will not be planning water deliveries through its typical allocation process until the state has a clearer picture of the hydrologic and reservoir conditions going into the spring (DWR 2021b).

MWD Drought Response

In MWD's report, Our Regional Reliability Outlook – Addressing Drought & Climate Resiliency, it states that if drought conditions continue, communities that are largely dependent on the SWP for their water supplies may only receive a very limited amount from the system. On the Colorado River, significantly low runoff in the Upper Basin led to the first-ever shortage declaration in the Colorado River system for 2022, with the increased likelihood of shortages over the next five years (MWD 2022).

Per the report, MWD and its member agencies and partners have responded with extraordinary operational drought actions to limit the use of and stretch SWP supplies. This is in addition to the introduction of new programs and outreach measures, agreements, conservation programs and a concerted effort to collaborate. After Gov. Gavin Newsom expanded his Executive Order declaring a statewide drought emergency to include all of California, MWD's board declared a Drought Emergency in November 2021 and called for increased efforts to maximize conservation, especially in communities dependent on SWP deliveries that face the greatest challenges (MWD 2022).

MWD's board took several steps at the close of 2021 to build on water system improvements. This took the form of water exchanges with other agencies that will increase deliveries of SWP supplies and other sources to the SWP-dependent area. Regardless of the specific location of the exchange, this strategy allows limited SWP supplies to be preserved for all areas that are dependent on that system (MWD 2022).

SDCWA Drought Response

In response to the Governor's drought emergency declaration, SDCWA activated Level 1- Voluntary Conservation of its Water Shortage Contingency Plan. Previous versions of the Water Shortage Contingency Plan have been activated twice before – once in 2007 and again in 2014. While the region isn't currently facing supply reductions, SDCWA's action to go to Level 1 was intended to send a signal that increased voluntary conservation efforts are necessary, and it gives local retail water agencies flexibility to address local conditions. While Level 1 calls for 10% voluntary water savings, the SDCWA is supporting the governor's call for a 15% reduction (SDCWA 2021c).

RDDMWD Drought Response

RDDMWD adopted Ordinance No. 15-120.2 which included a Drought Response Plan, in May of 2015 as Ordinance No. 15-120.2 (RDDMWD 2015). The response plan was developed to provide a response strategy as required by the California Water Code, by establishing methods and procedures to ensure that, in a time of shortage, available water resources are put to maximum beneficial use, and that the unreasonable method of use is prevented. RDDMWD's Board of Directors voted in late June 2016 to rescind Level 2 – Drought Alert of its Drought Response Ordinance and to reinstate Drought Level 1 – Drought Watch, until further notice. Per RDDWD Drought Regulations website, RDDMWD is still currently at Level 1 (Drought Watch). The Level 1 water use reduction level is voluntary and encourages customers to achieve water savings up to 10% as mandated by Rincon Water's Ordinance 15-120-2 (RDDMWD 2020b).

Vallecitos Water District Easement

The Vallecitos Water District (VWD) has a 20-foot wide pipeline easement directly adjacent to the southern boundary of the project site. The easement is for a water pipeline that conveys water from the San Diego Aqueduct to the VWD service area. The easement was recorded April 1, 1958 (Book 7018, page 508) and noted to be in favor of the San Marcos County Water District. The San Marcos County Water District later changed its name to the Vallecitos Water District. The Final Map for Escondido Tract No. 559, which covers the residential development south of the project site, including the homes on Cheyenne Lane, maps this easement as falling completely within the residential lots. The backyards and private fences of these adjacent residences fall within the easement area.

Wastewater

Wastewater Service Area and Infrastructure

Escondido's wastewater service area, which is not aligned with the City's incorporated boundary, is comprised of a variety of land uses including residential, commercial, industrial, and open space. The City's sphere of influence is the projected ultimate sewer service area which encompasses approximately 44,000 acres and includes the existing City boundary plus additional surrounding areas of the County ultimately planned for annexation (City of Escondido 2012).

The City owns and operates HARRF, which treats and disposes of all wastewater collected within the Escondido wastewater service area, plus flows from a portion of the Rancho Bernardo community in the City of San Diego. The facility treats all wastewater flows to a secondary level of treatment, and a portion of the wastewater flow is further treated at the tertiary level for use as recycled water.

Wastewater that is not reused is conveyed from the HARRF to the Escondido Land Outfall, which is owned by the City and consists of pipelines that vary from 30 to 36 inches in diameter. The land outfall roughly parallels Escondido Creek in a 20-foot-wide easement and operates under gravity flow to a point near Lone Jack Road in Olivenhain. From that point to the land outfall's connection with the ocean outfall, the pipeline flows under pressure. The junction of the Escondido Land Outfall and the San Elijo Ocean Outfall is located just west of Interstate 5 and north of the San Elijo Lagoon. The San Elijo Ocean Outfall is owned by the San Elijo Joint Powers Authority (SEJPA), and 79 percent of the outfall capacity is leased to the City. The current hydraulic capacity of the ocean outfall is 25.5 million gallons per day (MGD) and the City's leased capacity is 20.1 MGD of instantaneous flow. Operating capacity of the outfall is limited by the onshore 30-inch diameter section that has a design pressure limitation. Consequently, flows through the outfall are limited to 24.3 MGD through a flow-regulating valve of the Escondido Land Outfall. The City of Escondido leases 79 percent of the ocean outfall capacity, which is 19.2 MGD.

The City currently operates and maintains 14 sewer lift stations within the wastewater collection system. The wastewater collection system that delivers flow to the HAARF is comprised of approximately 380 miles of pipelines, 7,500 manholes, and 14 pumping stations.

Within the project vicinity there are existing local gravity sewer lines adjacent to the project site that serve the existing development within and around the site. There is an existing 10-inch gravity sewer line along the project's eastern frontage in North Iris Lane. This sewer conveys flow southward primary through easements up to the City's existing 15-inch diameter North Trunk Sewer. Generally, this existing North Trunk Sewer conveys sewage flow south and southwest. Sewage flow from the trunk sewer is ultimately conveyed to HARRF for treatment and disposal (Dexter Wilson 2021).

Existing and Future Wastewater Flows

The Escondido 2012 Wastewater Master Plan includes a wastewater system analysis assessing existing and projected wastewater flows, existing and projected capacity and needed capital improvements.

Since 2000 average annual flows gradually increased from approximately 10 MGD to a maximum of 11.9 MGD in 2007, and then decreased back down to 2000 levels. The average daily peak flow from Escondido to the HARRF is approximately 1.5 to 1.7 times the average annual flow, and corresponds to typical water usage throughout the day, which can be represented by a diurnal curve. The maximum

peak flow for each year occurs during periods of heavy rainfall and includes a significant amount of storm water inflow and infiltration.

The Wastewater Master Plan forecasted future (year 2030) waterflows, which considered General Plan anticipated buildout, SANDAG projections and existing customers. Year 2030 flows are forecasted to be 14.4 MGD. To meet future wastewater demands, the Master Plan identifies a series of Capital Improvement Projects over three phase (2012-2015, 2016-2020 and 2021-2030).

Stormwater Drainage

The City's stormwater drainage system operates under San Diego Regional Water Quality Control Board (RWQCB) Order Number R9-2013-0001 (MS4 Permit), as amended by Order Numbers R9-2015-0001 and R9-2015-0100. This permit was issued to manage discharges from municipal separate storm sewer systems (MS4s) in the San Diego region and was adopted on May 8, 2013, replacing the 2007 Municipal Stormwater Permit (R9-2007-0001). The 2013 MS4 Permit applies to all 21 municipal agencies in San Diego County, including the City of Escondido (City of Escondido 2017).

This permit requires each municipality in San Diego County to prepare a Jurisdictional Runoff Management Plan for the area under its jurisdiction. The City has developed multiple programs and systems by which to monitor and identify pollution sources, inventory pollutant-generating facilities, enforce environmental regulations and development guidelines, establish and inspect best management practices (BMPs), and educate municipal staff and the public on reducing the impacts of urban runoff.

The primary function of the City's MS4 is to collect and convey surface runoff during storm events to prevent flooding. The MS4 is a network of natural creeks and streams, retention areas, curbs/gutters, inlets, catch basins, pipes, culverts, and concrete channels. It also includes underground pipes and surface culverts that drain mostly to earthen or concrete flood control channels. Some older and/or steep roads in the city were developed without storm drains, and thus, runoff in these areas may flow along curbs for some distance before reaching an MS4 structure. The City has identified approximately 112 major MS4 outfalls as defined in the MS4 Permit (City of Escondido 2017).

Solid Waste

Solid waste disposal service for the city is provided by Escondido Disposal, Inc. (EDI), which offers solid waste, green waste, and recyclables pickup. EDI also operates a household hazardous waste facility in Escondido, which is open to city residents. Solid waste generated in the city is disposed of at the Sycamore Landfill or, alternatively, the Otay Landfill.

Based upon information from CalRecycle, the Sycamore Landfill is permitted to have a maximum daily throughput of 5,000 tons per day, has a remaining capacity of 113 million cubic yards, and an estimated closure date of 2042 (CalRecycle 2022a). The Otay Landfill has a maximum permitted throughput of 6,700 tons per day and a remaining capacity of 21 million cubic yards (CalRecycle 2022b).

Electricity and Natural Gas

Electricity and natural gas service is currently provided to the project site by San Diego Gas & Electric (SDG&E). SDG&E would serve the proposed development for electric service. The project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project would underground five existing SDG&E power poles along North Iris Lane. Four of the poles are along the

project frontage and one pole is located approximately 60 feet north of the project site on North Iris Lane. The project applicant would coordinate with SDG&E for the undergrounding of these poles. If the project utilizes natural gas, it would connect to the existing gas line within North Iris Lane.

3.16.2 Regulatory Framework

Existing federal, state, and local regulations related to water, wastewater, and solid waste that are applicable to the proposed project are summarized below.

3.16.2.1 Federal Regulations

Resource Recovery and Conservation Act

The Resource Recovery and Conservation Act Subtitle D focuses on state and local governments as the primary planning, regulating, and implementing entities for the management of non-hazardous solid waste, such as household solid waste and nonhazardous industrial solid waste. Subtitle D provides regulations for the generation, transportation, and treatment, storage, or disposal of hazardous wastes.

3.16.2.2 State Regulations

California Green Building Standards Code (CCR, Title 24, Part 11 – CALGreen)

In 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen, and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2019 standards became effective on January 1, 2020 (International Code Council [ICC] 2019). The nonresidential mandatory standards require the following measures that relate to utilities and service systems (24 CCR Part 11):

- Mandatory reduction in indoor water usage through installation of separate submeters or metering devices, and compliance with specified flow rates for plumbing fixtures and fittings and faucets and fountains.
- Mandatory reduction in outdoor water usage through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance and installation for recycled water supply systems where available/applicable.
- 65% of construction and demolition waste must be diverted from landfills and 100% of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Provide readily accessible areas for recycling that serve the entire building.
- Mandatory inspections of energy systems to ensure optimal working efficiency.

- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. These voluntary measures call for indoor and outdoor water use reduction, higher diversion of construction and demolition waste, further improvement in energy requirements, stricter water conservation, Increased percentage of recycled content in building materials, increase in permeable paving, cement reduction and cool/solar-reflective roofs.

Assembly Bill 939 and 341

In 1989, Assembly Bill (AB) 939, known as the Integrated Waste Management Act (California Public Resources Code, Section 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board (CIWBM), which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020.

Senate Bill 1383

Senate Bill 1838 (SB 1838) is a statewide effort to reduce emissions of short-lived climate pollutants (SLCP). Specifically, the law sets the following targets: 1) Reduce statewide disposal of organic waste by 50% by January 1, 2020 and by 75% by January 1, 2025 (based on 2014 levels), and 2) rescue at least 20% of currently disposed of edible food for human consumption by 2025. CalRecycle is the state agency responsible for creating the regulatory standards for SB 1383. Effective January 1, 2022 CalRecycle's regulations to meet statewide organics reduction and food recovery requirements take effect and effective January 1, 2024 regulations may require local jurisdictions to impose penalties for noncompliance on regulated entities subject to their authority.

Senate Bill 221

Signed into law on October 8, 2001, SB 221 established a process whereby sufficient water supply must be identified and available for new development for any residential development of 500 homes or more, or, in the case wherein a water supplier has fewer than 5,000 service connections or the proposed development would increase the number of connections by at least 10 percent, unless there is proof of adequate water over at least the next 20 years, including long periods of drought. Due to the size of the proposed project, a water supply assessment and verification report pursuant to SB 221 and SB 610, described below, are not required.

Senate Bill 610

Signed into law October 9, 2001, SB 610 resulted in amendments to the Public Resources Code and the Water Code. Revising provisions established by SB 901, SB 610 requires that the planning agency determine whether a proposed project, subject to CEQA, meets any of the thresholds for requiring preparation of a water supply assessment. Specifically, if the project is a proposed development of more than 500 dwelling units (or equivalent), the planning agency must then request that the urban water supplier prepare a water supply assessment. The assessment would include the identification of existing water entitlements, water rights, or water service contracts relevant to the water supply identified for the proposed project, and the amount of water received pursuant to such entitlements, rights, or contracts. Due to the size of the proposed project, a water supply assessment pursuant to SB 610 is not required.

Urban Water Management Plans

Urban water purveyors are required to prepare and update a UWMP every 5 years. The UWMPs address water supply, treatment, reclamation, and water conservation, and contain a water shortage contingency plan. Local UWMPs, such as those prepared by RDDMWD and other water districts, are supplemental to the regional plans prepared by MWD. The Water Conservation Bill of 2009 (SBX7-7) requires each urban retail water supplier to develop an urban water use target and an interim urban water use target. Notably, SBX7-7 authorizes urban retail water suppliers to determine and report progress toward achieving these targets on an individual agency basis or pursuant to a regional alliance as provided in California Water Code (CWC) Section 10608.28(a). As described above, water service to the site is provided by RDDMWD. In accordance with this regulation, the RDDMWD prepared and their Board of Directors adopted its 2020 UWMP in 2021. RDDMWD's UWMP includes estimated future water demands until 2045, using updated population projections. Demands provided in RDDMWD's UWMP have been coordinated with SDWCA, RDDMWD's wholesale supplier.

Water Shortage Contingency Plans

California Water Code (CWC) Section 10632 requires that every urban water supplier shall prepare and adopt a water shortage contingency plan as part of its UWMP. Section 10632.2 provides that, "An urban water supplier shall follow, where feasible and appropriate, the prescribed procedures and implement determined shortage response actions in its water shortage contingency plan…or reasonable alternative actions, provided that descriptions of the alternative actions are submitted with the annual water shortage assessment report pursuant to Section 10632.1." Notwithstanding, the CWC does not prohibit an urban water supplier from taking actions not specified in its Water shortage Contingency Plan, if needed, without having to formally amend its UWMP or Water Shortage Contingency Plan. MWD, SDCWA and RDDMWD have adopted water shortage contingency plans as part of their 2020 UWMPs.

3.16.2.3 Regional/ Local Regulations

Rincon Del Diablo Water District Ordinance No. 15-120.2

RDDMWD Drought Response Plan was updated and adopted in May of 2015 as Ordinance No. 15-120.2 (RDDMWD 2015). The response plan was developed to provide a response strategy as required by the California Water Code, by establishing methods and procedures to ensure that, in a time of shortage, available water resources are put to maximum beneficial use, and that the unreasonable

method of use is prevented. The Response Plan contains four levels, and was consistent with current regional messaging.

City of Escondido General Plan

The City of Escondido General Plan includes land use ordinances that facilitate development and manage growth. Chapter I, Vision and Purpose, includes policies that help development and managed growth complement rather than compete with each other. Chapter I also includes Quality of Life Standards that establish minimum thresholds of service levels for various public improvements and facilities. Quality of Life Standards are included for the city's wastewater system and water system, among others. The following excerpted text from the Quality of Life Standards applies to the project:

Quality of Life Standard 5: Wastewater System - The city wastewater system shall have adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs. Capacity to treat a minimum of 250 gallons per day for each residence on said system or as established in the city's Wastewater Master Plan shall be provided.

Quality of Life Standard 10: Water System - The city shall maintain provisions for an adequate water supply, pipeline capacity and storage capacity to meet normal and emergency situations and shall have the capacity to provide a minimum of 540 gallons per day per household or as established by the City's Water Master Plan. Federal and state drinking water quality standards shall be maintained. The city shall continue efforts to implement water reclamation and water conservation programs. The following General Plan goals and policies support this Quality of Life Standard:

- Water System Goal 2 - Adequate and sustainable infrastructure and water supply to serve a community that values and conserves water
- Water System Policy 12.5 - Require new development to provide adequate water facilities and/or finance the costs of improvements necessary to serve the demands created by the development and/or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone water system improvements in master planned development projects involving multiple phases and developers.
- Water System Policy 12.7- Require any new water facilities to be constructed to city standards.
- Water System Policy 12.9 - Employ best practices to maintain the highest possible energy efficiency in the water treatment plant and infrastructure system to reduce costs and greenhouse gas emissions.
- Water System Policy 12.10 - Implement federal and state drinking water quality standards for public water infrastructure facilities and private development projects.
- Water System Policy 12.11 - Continue to implement water conservation programs, such as requirements for water efficient landscaping and enforcement of water wise regulations, and amend as appropriate to reflect evolving technologies and best practices.
- Water System Policy 12.12 - Require new development to incorporate water conservation techniques into building and site design incorporating such elements as water efficient fixtures (e.g., low flow showerheads), drought-tolerant landscape, permeable hardscapes, and on-site stormwater capture and re-use facilities.

- Wastewater System Goal 3 - Provision of adequate and sustainable wastewater infrastructure to serve residents, businesses and property.
- Wastewater System Policy 13.3 - Design the wastewater system to support development of properties at the intensities specified by the General Plan Land Use Plan.
- Wastewater System Policy 13.5 - Require new development to provide adequate wastewater facilities and finance the costs of improvements necessary to serve the additional demands created by the development and/or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone wastewater system improvements in master planned development projects involving multiple phases and developers.
- Wastewater System Policy 13.7 - Require any new wastewater system facilities be constructed to city standards.
- Wastewater System Policy 13.9 - Collect a "per-unit" wastewater connection fee for all new housing units required to be serviced by the City's wastewater system.
- Storm Drainage Goal 4 - Provision of adequate and sustainable infrastructure that is environmentally sensitive to serve residents, businesses, and property.
- Storm Drainage Policy 14.2 - Improve the existing storm drainage system by correcting identified deficiencies.
- Storm Drainage Policy 14.3 - Levy Drainage Fees for subdivided and developed land to finance drainage improvements. Periodically review and adjust for inflation, construction costs, and changes in land development intensities and timing.
- Storm Drainage Policy 14.5 - Require new development to prepare drainage studies and improvement plans that demonstrate no net increase in stormwater runoff and compliance with adopted stormwater plans.
- Storm Drainage Policy 14.6 - Require new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion, while encouraging implementation of low impact development measures and the maximum use of natural drainage ways, consistent with sound engineering and best management practices.
- Storm Drainage Policy 14.7 - Require new development and redevelopment to minimize storm water runoff and contaminants entering drainage facilities by incorporating low impact development measures and other on-site design features such as bio-swales, retention ponds, and cisterns for storage and infiltration, treatment of flows, and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).
- Storm Drainage Policy 14.8 - Mitigate negative impacts to adjacent surrounding land uses from pertinent drainageway corridors by incorporating appropriate structural and non-structural best management practices (BMPs). BMP"s may include the use of screening, landscaping, or open space setbacks.
- Storm Drainage Policy 14.10 - Promote the joint use of stormwater drainage facilities for recreation and conservation purposes, such as integrating sports fields in detention basins, or trails along drainage courses.

- Storm Drainage Policy 14.12 - Design stormwater facilities to minimize the need for frequent maintenance.
- Storm Drainage Policy 14.13 - Design and maintain detention facilities that are environmentally sustainable and compatible with surrounding uses to maximize vector control, manage flows, and maximize opportunities for conservation of water.
- Solid Waste and Recycling Goal 5 - Reduction in the generation and disposal of solid waste.
- Solid Waste and Recycling Policy 15.8 - Encourage and promote the use of recycled materials in residential and non-residential applications, including construction and building materials, office supplies, and equipment. Continue the city's purchase of recycled materials and supplies outlined in the Recycled Products Purchasing Policy.
- Telecommunications Goal 17: Quality communication systems that enhance economic viability, governmental efficiency, and equitable access for all.
- Telecommunications Policy 17.4 -- Establish requirements for the incorporation and accessibility of state-of-the-art telecommunication systems and services (e.g., internet) for public use in public buildings (e.g., libraries) and support the development of informational kiosks in public places and streetscapes (e.g., parks, plazas, shopping malls).
- Telecommunications Policy 17.5 -- Establish requirements for the installation of state-of-the-art internal telecommunications technologies in new large-scale planned communities, and office and commercial developments (e.g., wiring of all new housing and businesses).
- Telecommunications Policy 17.6 - Encourage the installation of telecommunications systems (e.g., internet) in every city household to facilitate resident access to information about public services, transit, emergencies, and other information.

City of Escondido Municipal Code

Municipal Code Chapter 6, Article 18B, Public Facility Development Fee, requires that all new residential or nonresidential development pay a fee for the purpose of ensuring that the City's established public/drainage facility standards are met with respect to the additional needs created by such development. The amount of the applicable public facility fee due is determined by the fees then in effect, as established by City Council resolution, and the number and type of dwelling units in a proposed residential development project and/or the number of square feet and type of nonresidential development.

Chapter 22, Wastewaters, Stormwaters, and Related Matters, of the Municipal Code addresses stormwater management and discharge control, harmful waters and wastes, sewer service charges, private sewage disposal systems, sewer connection fees, sewer connection laterals, and industrial wastewaters and brine collection systems. Chapter 22 provides specific measures aimed at long-term management and operation of the city's stormwater and sewer infrastructure systems and protection of stormwater quality.

Chapter, 31, Water, of the Municipal Code addresses water management, including conservation, reclamation, regulation of waste discharge to the sewerage system and other water-related issues. Chapter 31 also addresses the construction, repair, destruction and reconstruction of wells within the city for the purposes of groundwater protection and general public health and safety.

City of Escondido Wastewater Master Plan

The City's Wastewater Master Plan was adopted in June 2012 (City of Escondido 2012). It documents the city's existing wastewater system facilities and flows and identifies required improvements for buildout of the City's Sphere of Influence (SOI), which is anticipated to occur by 2035. The SOI is the projected ultimate sewer service area and encompasses approximately 44,000 acres.

Within the city boundary, the sewer area is near buildout; the developed areas to the east that are within the city boundary but not currently connected to the city's wastewater collection system are on septic systems. The Master Plan was prepared to identify existing deficiencies in the system, confirm facility sizing, and recommend a future capital improvement program (CIP) based on updated wastewater flow generation analyses and hydraulic modeling. The Master Plan is intended to ensure continued reliable wastewater service through buildout of the city in accordance with the General Plan.

3.16.3 Thresholds of Significance

The State CEQA Guidelines Appendix G (14 CCR 15000 et seq.) has identified significance criteria to be considered for determining whether a project could result in significant impacts to utilities and service systems. An impact would be considered significant if the proposed project would have any of the following consequences.

- **Threshold #1:** Require or result in the relocation of reconstruction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- **Threshold #2** - Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- **Threshold #3** - 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?
- **Threshold #4** – 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?
- **Threshold #5** – Comply with federal, state, and local management and reduction statues and regulations related to solid waste?

3.16.4 Project Impact Analysis

As identified above, the project site is located within the RDDMWD water service area and the four residences on the project site are currently served by RDDMWD for water service. The project will abandon the existing 12-inch water line in Robin Hill Lane and install a new 12-inch main line in Robin Hill Lane. The project will connect to the new 12-inch line at the main project entrance and create a loop system that either connects back into Robin Hill Lane on the north side of the project or the west side of the project.

For sewer service the project proposes to include both public and private gravity sewer lines. For residential housing clusters with driveway access, private sewer collection facilities will be used to convey sewer flow to backbone public gravity sewer stymes on site within the main driveway. Sewer

service to the project site will be provided by connecting the proposed onsite sewer collection system to a new manhole on the existing 10-inch diameter sewer line in North Iris Lane east of the project site. In order to be serviced by the City for sewer service, the project site would need to annex into the City. Annexation into the City and the City's sewer service boundary is one of the discretionary actions proposed for the project and requires City and Local Agency Formation Commission (LAFCO) approval.

Threshold #1: Require or result in the relocation of reconstruction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Water

The existing water demand on the project site is associated with the four existing residences. The proposed project would include development of 102 multi-family residential units. As such, the proposed project would increase the intensity of uses on the project site, resulting in increased water use. CalEEMod Version 2020.4.0 default water usage rates were used to estimate the anticipated water demand of the proposed project. Based on the CalEEMod generation rates, water use per year would be 10.83 million gallons (LDN 2022, Appendix H.1). The project incorporates the following design features which will reduce water consumption:

- Installation of low flow water fixtures in all units,
- Compliance with the City's Model Water Efficient Landscape Ordinance, and
- Use of low-water species in the proposed landscape plan

RDDMWD currently imports all of its potable, treated water from SDCWA, particularly from the SDCWA First Aqueduct, and all of its recycled water from the City of Escondido's HARRF. As such, RDDMWD does not currently have water treatment facilities. As discussed in its Water Master Plan, RDDMWD would seek to offset increases in potable water demand by expanding its recycled water distribution system or developing local water supplies, which are projected to increase from 280 AFY in 2020 to 900 AFY in 2035 (RDDMWD 2014). RDDMWD will construct new storage and transmission mains as the system expands and new development service is required. The project applicant will pay the Water Capital Facility (Capacity) Fees that are in effect at the time of building pursuant to Ordinance NO. 21-98.2. As such, the proposed project would not result in the construction of new water treatment facilities.

The project will abandon the existing 12-inch water line in Robin Hill Lane and install a new 12-inch main line in Robin Hill Lane. The project will connect to the new 12-inch line at the main project entrance and create a loop system that either connects back into Robin Hill Lane on the north side of the project or the west side of the project. Water lines within the project site will consist of an 8-inch PVC fire main and a 2-inch PVC domestic water lines. Both lines will circulate beneath the main driveways throughout the project site. These improvements would occur within the project footprint, and environmental clearance for these impacts is covered under this EIR. As mentioned, the project applicant will be required to pay RDDMWD Capital Facility Fees for potable water meter installation, as described in RDDMWD Ordinance No. 21-98.21. For these reasons, the proposed project would not require or result in the relocation or construction of new water facilities. Impacts to water services would be **less than significant.**

Wastewater

A sewer analysis was prepared for the project and is included as Appendix M (Dexter Wilson 2021). As described above, the proposed project would develop 102 multi-family residential units. Currently one existing residence on the project site, 2089 North Iris Lane, is served by the City for sewer service. The other three residents have onsite septic, which would be abandoned and removed. New sewer lines would be designed to meet all requirements of the City's Design Standards and to the satisfaction of the Director of Utilities.

The design criteria used for the evaluation of the onsite and offsite sewerage impacts of the project were based on the City of Escondido Design Standards, dated April 2, 2014 and the City's 2012 Wastewater Master Plan. For residential uses, the average flow generation factor is 200 gallons per day (gpd) per unit, which equates to an average dry weather flow 20,400 gpd and a peak dry weather flow of 48,262 for the 102 unit project.

A hydraulic analysis was conducted to determine if the project would impact the existing sewer system (Dexter Wilson 2021). The analysis concluded that the existing system has adequate capacity to serve the project and that with the addition of sewer flows from the project, all sections of the existing 10-inch diameter sewer line will flow less than half full during peak conditions and all sections of the 15-inch diameter sewer line will flow less than three quarters full during peak flow conditions. Therefore, impacts to wastewater infrastructure would be **less than significant.**

Stormwater Drainage

As discussed in Section 3.9.4 (Hydrology and Water Quality), the proposed project would result in an increase of impervious areas to the site. If not carefully planned for, increased runoff from impervious surface can cause alterations to drainage courses. However, the proposed project has been designed to carefully handle runoff and to meet regulatory requirements to ensure that post-development runoff quantities and rates are similar to or less than the pre-development condition.

The project proposes to use combination facilities to provide treatment of site runoff, hydromodification mitigation and peak flow attenuation. Site runoff would be directed to three stormwater bioretention basins located along the western boundary of the project site near the project frontage with North Iris Lane. Basin 1 would be 3,053 square feet (s.f.), Basin 2 would be 3,562 s.f. and Basin 3 would be 2,287 s.f. These basins would serve as both retention and biofiltration features. These water quality basins would be maintained by the Homeowners Association. Although the project would include new storm water infrastructure (biofiltration basins) to support project facilities, the proposed infrastructure has been accounted for and analyzed throughout this EIR. The project would not contribute a substantial amount of new stormwater runoff relative to existing conditions, and impacts are determined to be **less than significant.** Please refer to Section 3.9, Hydrology and Water Quality, for additional discussion related to drainage.

Electricity and Natural Gas

As discussed in Section 3.5.4, the amount of electricity used during construction would be minimal. Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside construction trailers and heating, ventilation, and air conditioning), and electrically powered hand tools would be provided by SDG&E. The electricity used for construction activities would be temporary and minimal. As discussed in Section 2.5.7, the project would connect to existing SDG&E infrastructure in North Iris Lane and Robin Hill Lane. The project would underground five existing SDG&E power poles along North Iris Lane. Four of the poles are along the project frontage and one

pole is located approximately 60 feet north of the project site on North Iris Lane. The project applicant would coordinate with SDG&E for the undergrounding of these poles.

During operations, the proposed project is estimated to have a total electrical demand of approximately 444,145 kWh per year, which was estimated using CalEEMod Version 2020.4.0 (LDN 2022, Appendix H). The proposed project includes various on-site features and measures to reduce the proposed project's energy consumption including:

- All indoor and outdoor lights in the project shall be designed to use LED technology.
- The project shall utilize ENERGY STAR qualified appliances.
- The project shall install two kilowatts (kW) of solar per unit, or roughly 204 kW of solar in total at the project site.

Further, the proposed project would be required to be consistent with appropriate mandatory project design feature in the CAP Consistency Worksheet that would reduce operational electricity consumption and would be built in compliance with Title 24 requirements applicable at that time. Homes built in 2020 and beyond will be highly efficient and include solar photovoltaic generation to meet the home's expected annual electric needs (CEC 2018). Thus, the proposed project would not require or result in the relocation or construction of expanded electric power facilities. Impacts would be **less than significant**.

SDG&E maintains a gas distribution system within North Iris Lane. If the project utilizes gas utilities, the gas line will be extended to the project site through the same joint trench alignment as electrical, cable and telephone facilities.

As discussed in Section 3.5.4, natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline. Any minor amounts of natural gas that may be consumed as a result of proposed project construction would be temporary and negligible and would not have an adverse effect on the environment.

The proposed project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Prior to project approval, the applicant would ensure that the proposed project meets Title 24 requirements applicable at that time, as required by state regulations through their plan review process. Thus, the proposed project would not require or result in the relocation or construction of new or expanded natural gas facilities. Impacts would be **less than significant.**

Telecommunications

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. However, no specific systems upgrades are proposed with this project, and the location and extent of future facilities is not known at this time. Thus, the project would not result in physical impacts associated with the construction of communications systems. Impacts would be **less than significant.**

Threshold #2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Water Demand

As discussed, the proposed project would be served by RDDMWD. RDDMWD anticipates the demand of future development through their master planning process. Per the RDDMWD 2020 UWMP, in 2020 total demand for potable and non-potable water was 4,630 AFY. It should be noted that water demands for 2020 were significantly less than those projected in the 2015 UWMP of 7,668 AF in 2020. This variance was due to continued and permanent response to earlier mandatory water use restrictions in response to the State Water Resources Control Board's (SWRCB) emergency drought regulations (RDDMWD 2021).

RDDMWD has estimated that future demands will increase at the same rate as the SANDAG-projected population growth rate for RDDMWD's service area and generally maintain the same user type profile. Potential annexations (24 AFY in 2025) are listed in addition to the population-based demand projections to ensure that adequate water is available for these additional customers. RDDMWD's UWMP utilizes SANDAG growth projections for its project planning. As the project is proposing a density increase, there would be a corresponding increase in water demand that would not have been included in the UWMP and Master Plan. As shown in Table 3.16-1, the projected potable and non-potable water demands for Years 2025 and 2030 are 6,672 acre-feet per year and 7,153 acre-feet per year, respectively (RDDMWD 2021). CalEEMod Version 2020.4.0 assumed 9.8 million gallons of water per year or approximately 30 acre-feet per year. The estimated water consumption of the proposed project is approximately 0.45% of RDDMWD's projected water demand for 2025 and 0.42% of its project demand for 2030.

Supply

As part of its UWMP, RDDMWD must demonstrate that it can reliably meet current and future water demands. According to the UWMP, RDDMWD's water supplies for 2020 totaled 6,617 acre-feet. Table 3.16-2, above, shows projected water supplies through 2045. As shown, projected reasonably available water supply is 8,872acre-feet for 2025 and 11,856 acre-feet for 2030. The projections reflect the RDDMWD goal to supply the growth in demand arising from new development. The UWMP confirmed that current and future water demands for RDDMWD customers can be met through 2045. This has additionally been confirmed in SDCWA's 2020 UWMP and MWD's 2020 UWMP. The Water Reliability Assessment completed as part of the UWMP, concluded that RDDMWD is well-positioned to withstand the effects of a single dry year and a five-year drought at any period between 2025 and 2045. RDDMWD's drought risk was specifically assessed between 2021 and 2025, assuming that the next five years are dry years. In each case, water supplies comfortably exceed water demands. This remains true whether the drought occurs in 2021, 2045, or any year between (RDDMWD 2021).

In addition, as discussed above MWD, SDCWA and RDDMWD approved water shortage contingency plans as part of their 2020 UWMPs. The plans include guidance and processes for assessing potential gaps between planned water supply and demands for current year and the next potentially dry year. The plan's include water shortage response actions including a combination of demand reduction, supply augmentation, and operational changes.

Considering existing and estimated future water demand, as described in RDDMWD's UWMP, it is reasonably foreseeable that RDDMWD would have sufficient supplies to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Further,

the project site would be redeveloped in compliance with the California Green Building Code (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage in combination with RDDMWD's ongoing water conservation practices. For these reasons, impacts would be considered **less than significant.**

Threshold #3: 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.

As discussed under Threshold #1, above, the project would connect to the existing 10-inch sewer line in North Iris Lane. No upsizing of sewer lines is required to serve the project. In order to be serviced by the City for sewer service, the project site would need to annex into the City. Annexation into the City and the City's sewer service boundary is one of the discretionary actions proposed for the project and requires City and LAFCO approval. A hydraulic analysis was conducted to determine if the project would impact the existing sewer system. The analysis concluded that the existing system has adequate capacity to serve the project and that with the addition of sewer flows from the project, all sections of the existing 10-inch diameter sewer line will flow less than half full during peak conditions and all sections of the 15-inch diameter sewer line will flow less than three quarters full during peak flow conditions (Dexter Wilson 2021). Therefore, impacts to wastewater infrastructure would be **less than significant.**

Threshold #4: 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.

Demolition and construction of the proposed project would result in the generation of solid waste. The California Green Building Standards Code requires all newly constructed buildings and demolitions to develop a CWMP and divert a minimum of 65% non-hazardous construction debris. The project will be required to prepare and implement a Construction Waste Management Plan (CWMP) prior to demolition and construction, which will identify what demolition and construction materials will be reduced/salvaged, recycled or disposed of at a landfill.

Operation of the proposed project would represent an increase in intensity of uses on the project site, which would likely be associated with increased generation of solid waste. The anticipated solid waste generation from the proposed project was estimated using CalEEMod Version 2020.4.0, which estimated that the proposed project would generate approximately 46.92 tons of solid waste per year (LDN 2022, Appendix H). This does not consider any waste diversion through recycling. According to CalRecycle, the City of Escondido has a disposal rate target of 5.9 lbs/person/day. If the City meets this target, the City is considered in compliance with the 50 percent diversion requirement of AB 939. The most recent approved data (2020) from CalRecycle identifies the annual per capital disposal rate for the City is 6.7 lbs/person/day (CalRecycle 2020). Currently the City is not meeting their target for AB 939 compliance.

Solid waste generated by the project would be collected by EDI and transported to the Sycamore Landfill or, alternatively, the Otay Landfill. According to CalRecycle, the Sycamore Landfill has a daily permitted capacity of 5,000 tons per day for solid waste, a remaining capacity of 113 million cubic yards and an anticipated closure date of 2042 (CalRecycle 2022a). According to CalRecycle, the Otay Landfill has a daily permitted capacity of 6,700 tons per day for solid waste, a remaining capacity of 21 million cy, and an anticipated closure date of 2030 (CalRecycle 2022b).

Solid waste generated by the proposed project during operation would be approximately 257 pounds per day, or 0.13 tons per day, assuming no diversion. However, the proposed project would be required

to comply with AB 341, which requires a 75 percent diversion rate. As such, assuming a 75 percent diversion rate, solid waste would be reduced to 65 pounds per day, or 0.033 tons per day. Thus, the project would contribute a minimal amount of solid waste to Sycamore Landfill or Otay Landfill's daily permitted capacity. As such, the proposed project's solid waste generation can be accommodated at the landfill. The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be **less than significant.**

Threshold #5: Comply with federal, state, and local management and reduction statues and regulations related to solid waste.

The proposed project would comply with all federal, state, and local statues and regulations regarding solid waste. More specifically, the proposed project would comply with AB 341, which requires a 75 percent diversion rate. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, Public Resources Code (Sections 44001- 44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.) authorizes the County Department of Environmental Health, Local Enforcement Agency to issue solid waste facility permits. The Sycamore Landfill and Otay Landfill are permitted facilities and EDI is a licensed hauler. As such, the project would comply with existing regulations related to solid waste disposal and would not violate federal, state, or local management and reduction statutes and regulations related to solid waste. Impacts would be **less than significant.**

3.16.5 Cumulative Impact Analysis

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. Pursuant to CEQA Guidelines Section 15130(b)(1)(A)(B), an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future projects producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or a related planning document that describes conditions contributing to the cumulative effect. For purposes of assessing the proposed project's cumulative impact with respect to utilities and services systems, the cumulative analysis is based upon a combined list and plan project approach.

Water

The cumulative projects included in Table 2-2 are within RDDMWD's service area for potable water service and would contribute to the cumulative demand for water supply and water infrastructure. However, RDDMWD anticipates the demand of future development through their master planning process. The UWMP confirmed that current and future water demands for RDDMWD customers can be met through 2045. This has additionally been confirmed in SDCWA's 2020 UWMP and MWD's 2020 UWMP. The Water Reliability Assessment completed as part of the UWMP, concluded that RDDMWD is well-positioned to withstand the effects of a single dry year and a five-year drought at any period between 2025 and 2045. RDDMWD's drought risk was specifically assessed between 2021 and 2025, assuming that the next five years are dry years. In each case, water supplies comfortably exceed water demands. This remains true whether the drought occurs in 2021, 2045, or any year between (RDDMWD 2021).

As described in Section 3.16.4, above, the proposed project would result in less than significant impacts to water supply services. All projects would be required to pay applicable Capital Facility Fees

to RDDMWD, which are required to go towards infrastructure improvements. Thus, cumulative impacts to water services would be **less than significant.**

Wastewater

Cumulative projects that are within the City's sewer service area for wastewater services would contribute to the cumulative demand for wastewater services. The City anticipates the demand of future development through their master planning process. Cumulative projects that are consistent with the land use assumptions made in City Wastewater Master Plan would have already had their demand accounted for.

As discussed in Section 3.16.4, the existing wastewater system has adequate capacity to serve the project and that with the addition of sewer flows from the project, all sections of the existing 10-inch diameter sewer line will flow less than half full during peak conditions and all sections of the 15-inch diameter sewer line will flow less than three quarters full during peak flow conditions. Thus, there is adequate capacity to serve the project as well as future projects that would contribute wastewater flows to the same infrastructure as the project. Additionally future projects would be required to pay the City's residential wastewater connection fee. Therefore, cumulative impacts to wastewater infrastructure would be **less than significant.**

Solid Waste

Future development projects would generate solid waste to be disposed of at the Sycamore Landfill or the Otay Landfill. According to CalRecycle, the Sycamore Landfill has a daily permitted capacity of 5,000 tons per day for solid waste, a remaining capacity of 113 million cy and an anticipated closure date of 2042 (CalRecycle 2022a). According to CalRecycle, the Otay Landfill has a daily permitted capacity of 6,700 tons per day for solid waste, a remaining capacity of 21 million cy with an anticipated closure date of 2030 (CalRecycle 2022b). Thus, there is adequate capacity throughout the County to serve future development projects, including those identified on the cumulative project list (Table 2-2). Cumulative impacts for solid waste would be **less than significant.**

3.16.6 Mitigation Measures

Based upon the analysis presented in Sections 3.16.4 and 3.16.5, impacts to utilities and service systems would be less than significant. Thus, no mitigation is required.

3.16.7 Conclusion

Based upon the analysis presented in Section 3.16.4 and 3.16.5, the project can be adequately served by existing utilities infrastructure and water supplies. The project's water demand can be met by existing water entitlements and the existing water infrastructure is adequate to serve the project. Similarly, based upon the sewer analysis, there is existing capacity in local sewer lines to accommodate the increase in flows associated with the project. Solid waste anticipated to be generated by the project can be accommodated in area landfills. In summary, all utilities and services impacts will be less than significant.

4.0 Other CEQA Considerations

4.1 Significant and Unavoidable Impacts

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must identify the following four components, which are addressed in this chapter:

- Growth-inducing impacts of the project (Section 4.1)
- Effects found not to be significant as a result of project implementation (Section 4.2)
- Significant irreversible environmental effects that would be involved in the project should it be implemented (Section 4.3)
- Significant environmental effects that cannot be avoided if the project is implemented (Section 4.4)

4.2 Growth Inducement

As required by the State CEQA Guidelines, an Environmental Impact Report (EIR) must include a discussion of the ways in which the proposed project could directly or indirectly foster population growth or economic development, and how that growth would, in turn, affect the surrounding environment (State CEQA Guidelines Section 15126.2[d]). According to State CEQA Guidelines Section 15126.2(d), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 4.1.1 through 4.1.3.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type and intensity of growth, it is the primary means of regulating development and growth in that community.

The intensity of development proposed by the project would be less than the maximum allowed under the County's General Plan. The site is designated as Village Residential (VR-24) which allows up to 24 du/acre or 184 units on the site. Within the Escondido General Plan, the site is identified as Suburban (S) with a density of 3.3 du/acre, which would allow up to 23 single family residences on the site. The City has anticipated residential on the project site; however, the proposed number of units would be greater than what is identified in the City's General Plan. The project proposes 102 multi-family units, which is 79 units more than identified in the City's General Plan. The project would act as an infill project with the existing residential development surrounding the proposed project. The proposed project would not extend roads or sewer lines beyond the subdivision boundary. Any utility improvements are solely to serve the project and would not facilitate future growth.

4.2.1 Direct Population Growth

The proposed project would directly influence population in Escondido by providing 102 new multifamily residential units on the project site. According to the City, there is an average of 3.13 persons per household in Escondido (City of Escondido 2021). Using this number, and assuming a net increase of 98 units on the project site (there are four existing residences), the project would increase the City's existing population of 151,115 (City of Escondido 2021) by about 307 persons, to approximately 151,422, or by 0.2%. This population increase would be very small and would not be likely to adversely affect the City or its services. The physical environmental impacts associated with the proposed project's construction and operation as a multifamily residential development are analyzed in Sections 3.1 through 3.16 of this EIR. The analysis has demonstrated that there are adequate services available to serve the project.

4.2.2 Economic Growth

The project would involve residential development and would not include any commercial or industrial development. Other than the short-term construction activities, the project would not directly generate jobs or economic activity. Based on a factor of 3.13 persons per dwelling unit, the proposed project's net increase of 98 residential units (there are four existing residences) would add approximately 307 residents to the City's population.

These new residents would incrementally increase activity in nearby commercial establishments. Project residents would be expected to draw on existing retail and commercial services already available in the area rather than inducing new service providers to relocate to the area. As a result, no significant physical effects are anticipated to result from economic growth generated by the proposed project. The proposed project would, however, have minor beneficial economic effect on local retailers and service providers.

4.2.3 Removing Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The project would trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure that was previously not available. Implementation of the project would result in the introduction of residential land use to a site that currently has four residential units and is surrounding by residential development of mixed densities and a senior living facility. The project will connect to existing utilities within North Iris Lane including water, sewer, electricity and telecommunication services, and natural gas, should the project decide to use natural gas.

The project would make roadway and pedestrian improvements on North Iris Lane and Robin Hill Lane. Currently, along the project frontage, North Iris Lane has a 47-foot right-of-way, one travel lane in each direction and a sidewalk on the eastern side of the road. The proposed project would provide a 15-foot right-of-way dedication along the project frontage with North Iris Lane to create a 62-foot right of way, which would allow for wider travel lanes and a 4-foot sidewalk along the project frontage. The applicant would install approximately 850 feet of sidewalk along the project frontage with North Iris Lane. This would complete a missing section of sidewalk along North Iris Lane and improve pedestrian network connectivity for the neighborhood.

Robin Hill Lane is currently a private roadway that is 20-feet wide with no sidewalk. Under the proposed project, the project would provide an additional 24-foot easement to the existing 20 foot easement, which will include two 16-foot travel lanes, a 4-foot sidewalk, and a parkway. The project would install approximately 440 feet of sidewalk on Robin Hill Lane.

These are improvements to an existing roadway that would improve safety but would not encourage additional traffic volumes. As such, the improvements to North Iris Lane and Robin Hill Lane would not trigger growth in the area.

4.3 Effects Found Not to be Significant

Agriculture and Forestry Resources

The project site is currently within San Diego County's jurisdiction but adjacent to areas that are within the City. The current County zoning on the project site is Village Residential (VR-24), which allows for up to 24du/ acre. In the City's General Plan, this site is identified as Suburban which allows for up to 3.3. du/acre.

The project site is not planned or zoned for agricultural or forestry uses and is not designated under a Williamson Act contract. The project site is designated as "Urban and Built-up Land" by the State of California, Department of Conservation Division of Land Resources Protection, Farmland Mapping and Monitoring Program (CDC 2018). The proposed project is not forest land, timberland or timberland zoned timber production. The proposed project would not cause the rezoning of agriculture of forest land. The project site is surrounding by development. Therefore, the proposed project would have no agriculture or forestry resources impacts.

Mineral Resources

The project site is relatively small (7.7 acres) and is surrounded by development. The project site is not identified as an existing or former mineral extraction site (City of Escondido 2012b). Implementation of the project would not result in the loss of a local, regional, or state mineral resources. No impact is identified.

Wildfire

The project site is not located in or near a State Responsibility Area (SRA), which is the area of the state where the State of California is financially responsible for the prevention and suppression of wildfires. SRA does not include lands within city boundaries or in federal ownership. As such, the project site is located in a Local Responsibility Area and fire services are provided by the Escondido Fire Department.

The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's FHSZ Viewer Map and is surrounded by areas also identified as Non-VHFHSZ (CalFire 2022). The existing highly developed project vicinity and development of the project site would not exacerbate wildfire risk with respect to exposure of project occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or alter post-fire slope stability. The project would also not require the installation or maintenance of associated infrastructure that may exacerbate fire risk.

Due to its location within an Escondido High Fire Hazard Severity Zone, all new structures will meet applicable Fire and Building Codes pursuant to requirements for ignition resistance (California Building Code, Chapter 7A). While the Project would not be considered a shelter-in-place development, these

structures would be intended to provide temporary refuge as a contingency to evacuation should evacuation be considered less safe. Hardening each building against a wildfire would require building features as follows:

- New Class-A fire-rated roof and associated assembly. With the proposed Class-A fire-rated roof, there will be attic or void spaces above living spaces requiring ventilation to the outside environment. The attic spaces will require either ember-resistant roof vents or a minimum 1/16-inch mesh and shall not exceed 1/8-inch mesh for side ventilation (recommend BrandGuard, O'Hagin, or similar vents).
- Multi-pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes (CBC 708A) when tested according to NFPA 257 (such as SaftiFirst, SuperLite 20-minute rated glass product), or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2
- Ember resistant vents with a minimum of meeting the 1/16 inch to 1/8 inch mesh size.
- Exterior walls meeting CFC 707A.3
- Accessory structures, appendages, decks meeting ignition resistant requirements of CBC 709A and 710A

An approved, automatic fire sprinkler system will be installed in all new structures for the Project in accordance with minimum NFPA 13 D or R3 standards, 2019 CFC and CBC, and RFPD Fire Code or the current, adopted Code editions at the time building permits are issued. Additionally, information about "Ready Set Go" program will be provided in Owner's manuals. This program is designed to help residents prepare in the event of an approaching wildfire. As such, through compliance with existing regulations, impacts related to wildland fires would be **less than significant.**

A discussion of fire protection services for the proposed project is discussed in Section 3.13, Public Services.

4.4 Significant Irreversible Environmental Changes

CEQA Guidelines, Section 15126.2(c), requires that an EIR identify any significant irreversible environmental changes associated with the proposed project. Such changes include, for example, the intensification of land use or irreversible damage from environmental accidents associated with the proposed project.

Implementation of the proposed project would result in irreversible environmental changes. Approval of the project would involve the development of 102 multi-family residential units. Development would result in direct impacts to biological resources through the removal of sensitive habitat (disturbed wetland and nonnative grassland) and jurisdictional habitat. These impacts are discussed in Section 3 of this document and mitigation measures are identified to reduce these biological resources impacts to below a level of significance. Although mitigated to a less-than-significant level, such impacts would be considered irreversible.

Further, construction and/or operation of the proposed project would require the use of resources that include, but are not limited to, soils, gravel, concrete, and asphalt, lumber and other related forest products, petrochemical construction materials, steel, copper, and other metals, water, fuels, and energy. As such, the proposed project would result in the short-term and long-term use of fossil fuels and other nonrenewable resources.

4.5 Significant Unavoidable Impacts

In accordance with State CEQA Guidelines Section 15126.2 (b), any significant unavoidable impact of a proposed project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR.

Sections 3.1 through 3.16 of this EIR provide an analysis of the project's potentially significant adverse environmental effects and any necessary mitigation measures, as well as the level of significance both before and after mitigation. All of the project's identified significant impacts would all be reduced to less-than-significant with implementation of mitigation measures. The project will not result in any significant unavoidable impacts.

5.0 Alternatives

5.1 Introduction to Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines states that the Environmental Impact Report (EIR) shall "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

The range of alternatives evaluated in an EIR is governed by the "rule of reason" that requires the EIR set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative [Section 15126.6(a) of the CEQA Guidelines].

In developing the alternatives to be addressed in this EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Section 3.0, Environmental Analysis, of the EIR.

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, the Escondido City Council (see PRC Section 21081[a][3].)

5.2 Project Objectives

Section 15124(b) of the CEQA Guidelines requires an EIR to include a statement of objectives for the proposed project. The objectives outline the underlying purpose of the project and assist in the development of project alternatives. The following project objectives have been identified for the proposed project:

- Develop a workforce housing community by providing a range of unit types, sizes, and bedroom numbers thereby accommodating a range of affordability a full spectrum of family demographics to contribute to the growing housing needs of the region.
- To the extent possible given the site constraints, maximize the opportunity to provide housing to Escondido using the Urban III land use classification which provides for up to 18 units per acre.
- Create high-quality recreational open space opportunities for the residents of all ages to enjoy thereby fostering a healthy community environment.
- Design a multi-family community with private open space areas for units where families can gather and enjoy healthy indoor-outdoor living.
- Annex the project to the City of Escondido which provides quality infrastructure, public services, and facilities capable of serving the development.

5.3 Project Alternatives Considered in this EIR

5.3.1 Description of Alternatives

The following alternatives are under consideration for this project:

- No Project/No Development Alternative (Section 5.3.3)
- No Project/Existing Escondido General Plan Land Use Designation Alternative (Section 5.3.4)
- No Project/Existing San Diego County General Plan Land Use Designation Alternative (Section 5.3.5)
- Reduced Footprint Alternative (Section 5.3.6)

Alternatives considered and removed from further consideration are summarized in Section 5.4.

5.3.2 Summary of Impacts

Project- and cumulative-level impacts associated with implementation of the proposed project are evaluated in Sections 3.1 through 3.16 of this Draft EIR. As identified in Table 1-1, in Chapter 1 (Summary), construction and/or operation of the proposed project would have the potential to cause the following significant impacts. All project impacts would be reduced to below a level of significance with the exception of the VMT-related transportation impact.

- **Impact BIO-1:** Potential to impact avian species protected under the Migratory Bird Treaty Act if tree removal, vegetation removal, or other construction activities occur during the nesting season.

- **Impact BIO-2:** The project will directly impact 0.1 acre of disturbed wetland and 2.5 acres of non-native grassland.

- **Impact BIO-3:** Project development results in a direct impact to a total of 0.05 acre (494 linear feet) of U.S Army Corps of Engineers (USACE)/Regional Water Quality Control Board (RWQCB) jurisdiction (non-wetland water of the United States/water of the State) and to 0.12 acre of California Department of Fish and Wildlife (CDFW) jurisdictional areas consisting of 0.10 acre of disturbed wetland- and 0.02 acre of streambed. Impacts to a total of 0.05 acre of USACE/RWQCB jurisdiction occur within the CDFW jurisdictional limits.

- **Impact BIO-4:** Project construction has the potential to impact 11 protected oak trees and 12 mature oak tree both on-site and off-site.

- **Impact BIO-5:** Removal of trees on the project site has the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species.

- **Impact CR-1:** Due to grading and ground disturbing activities, the project has the potential to impact unidentified archeological resources on the project site.

- **Impact CR-2:** There is a potential for project construction activities to disturb previously unidentified human remains on the project site.

- **Impact GEO-1:** Project grading may result in disturbance of previously unknown paleontological resource.
- **Impact HAZ-1:** Improper removal of asbestos-containing materials and lead-based paint during demolition could expose construction workers to a hazardous release of asbestos or lead.
- **Impact HAZ-2:** Undocumented fill material may contain contaminated materials.
- **Impact N-1:** If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines.
- **Impact TR-1:** The project's per capita VMT exceeds the significance threshold of 15% below regional average.

5.3.3 No Project/No Development Alternative

Under the No Project/No Development Alternative, the proposed project would not be implemented, and the project site would remain in its current condition. No grading or construction would occur on the project site under this alternative.

The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. The southern portion of the project site is currently used as a horse pasture. Current access to the project site is via two private driveways on North Iris Lane and one private driveway on Robin Hill Lane. Existing vegetation communities on the project site include urban/developed, non-native grassland, disturbed habitat, and non-native vegetation. There is a small area (0.1 acre) of disturbed wetlands associated with a drainage that runs west-east in the southcentral portion of the project site.

5.3.3.1 Comparison of the Effects of the No Project/No Development Alternative to the Proposed Project

Aesthetics

Under this alternative the project site would remain in its current condition and the visual character of the site would not change. The site is currently developed with four single family residences, sheds and storage areas, a paved driveway, a septic tank and a well. The southern portion of the project site is currently used as a horse pasture. Existing vegetation communities on the project site include urban/developed, non-native grassland, disturbed habitat, and non-native vegetation. Elevations on the project site range from 710 to 740 feet AMSL. No grading or landform modification would occur under this alternative. This alternative would not add additional sources of lighting to the project site and vicinity. Compared to the proposed project, this alternative would reduce impacts. However, as discussed in Section 3.1, impacts to aesthetics for the proposed project would be less than significant and no mitigation would be required. No aesthetics impacts would occur under the No Project/No Development Alternative.

Air Quality

Under the No Project/No Development Alternative, air emissions associated with project construction including those associated with grading, site preparation, site finishing and building finishing would not occur. Implementation of this alternative would not introduce any uses that could generate air emissions. Thus, compared to the proposed project, this alternative would not result in any air quality

emissions. However, as discussed in Section 3.2, impacts to air quality for the proposed project would be less than significant and no mitigation would be required. Compared to the proposed project, this alternative would reduce air quality emissions. No air quality impacts would occur under the No Project/No Development Alternative.

Biological Resources

The No Project/No Development Alternative would not require any ground-disturbing activities. As such, this alternative would avoid the potential impacts to nesting birds (Impact BIO-1), 2.5 acres of non-native grassland and 0.1 acre of disturbed wetland (Impact BIO-2), impacts to jurisdictional wetlands and non-wetland waters (Impact BIO-3), impact to mature and protected trees (Impact BIO-4) and the potential for infectious tree diseases (Impact BIO-5). The project does include mitigation measures to reduce these impacts to below a level of significance. However, because impacts to biological resources would be avoided under the No Project/No Development Alternative, mitigation measures MM-BIO-1 through MM-BIO-5 would not be implemented or required. Compared to the proposed project, this alternative would eliminate the biological resources impacts. No biological resources impacts would occur under the No Project/No Development Alternative.

Cultural Resources/Tribal Cultural Resources

The No Project/No Development Alternative would not require any ground-disturbing activities. Therefore, there would be no potential to impact unknown archaeological resources potentially located within the project site (Impact CR-1). Further, there would be no potential to disturb previously unidentified human remains that may be present on the project site (Impact CR-2). As such, mitigation measures MM-CR-1 through MM-CR-10 would not be implemented or required. Although there may be a reduced level of direct impact to cultural resources, any previously undiscovered on-site resources could be subject to continued degradation due to lack of preservation of the undeveloped site. Compared to the proposed project, this No Project/No Development Alternative would result in a reduced level of impact to cultural resources as no ground disturbance would occur.

Energy

Under the No Project/No Development Alternative, there would be no energy use associated with project construction and operation, since no development would occur. Energy use would still occur to serve the four existing residences on the project site. While impacts under the proposed project related to energy use were determined to be less than significant, they would be completely eliminated under this alternative since there would be no new energy use. Compared to the proposed project, the No Project/No Development Alternative would eliminate the energy use identified for the project and there would be no energy impacts.

Geology and Soils

Under the No Project/No Development Alternative, the project site would remain in its current state. Existing topography and on-site soils would not be modified to accommodate proposed development. Potential impacts to unknown paleontological resources (Impact GEO-1) that were identified for the project would be avoided under this alternative, as there would be no ground disturbing activities. Compared to the proposed project, the No Project/No Development Alternative would reduce potential impacts related to geology and soils.

Greenhouse Gas Emissions

Under the No Project/No Development Alternative, greenhouse gas (GHG) emissions associated with electricity and natural gas use, water use, and solid waste handling associated with future residences would not occur. This alternative would not introduce any additional people or uses to the site that would generate greenhouse gas emissions. Additionally, since this alternative would not generate project-related trips, GHG emissions associated with new vehicular trips would not occur. However, as described Section 3.7, the proposed project's GHG impacts would be less than significant. Thus, although the No Project/No Development Alternative would reduce GHG emissions, compared to the proposed project, this alternative would not eliminate any potential significant impacts to GHG emissions. No GHG impacts would occur under the No Project/No Development Alternative.

Hazards and Hazardous Materials

Under the No Project/No Development Alternative, no uses would be introduced that could result in the use or generation of hazardous materials. Potential impacts related to the potential accidental release of asbestos-containing materials and lead based paint (Impact HAZ-1) that were identified for the project would be avoided under this alternative, as there would be no demolition activities. While the potential for contaminated soil from undocumented fill delivered to the site would still exist (Impact HAZ-2), this alternative would not include ground disturbing activities that could involve that undocumented fill. While the proposed project's hazards and hazardous materials impacts were mitigated to less than significant, this alternative would eliminate the need for MM-HAZ-1a, MM-HAZ-1b, and MM-HAZ-2 to further minimize potential impacts related to hazards and hazardous materials. No hazards and hazardous materials impacts would occur under the No Project/No Development Alternative.

Hydrology and Water Quality

Under the No Project/No Development Alternative, no development would occur, and no new impervious surfaces would be created. The existing on-site hydrologic conditions, drainage patterns, and drainage volumes would remain unaltered. Water quality would also remain unchanged. However, as described in Section 3.9, the proposed project's impacts to hydrology and water quality would be less than significant. Thus, although the No Project/No Development Alternative would reduce potential hydrology and water quality impacts on site, this alternative would not eliminate any potentially significant impacts to hydrology and water quality. It should be noted that under this alternative, the stormwater infrastructure along the project frontages would not be developed.

Land Use and Planning

Under this alternative, the project site would remain in its current condition developed with four single family residences and associated structures. None of the discretionary approvals identified for the project would be required including annexation into the City, the General Plan Amendment from Suburban (up to 3.3 du/acre) to Urban 3 (up to 18 du/acre), the Prezone from No Zoning designation to Planned Development – Residential (PD-R 13.2) with a density of 13.2 units/acre, Master and Precise Development Plan and the Tentative Subdivision Map. Land use and planning impacts were determined to be less than significant for the proposed project. No impact to land use and planning would occur under the No Project/No Development Alternative.

Noise

The project site is currently developed with four single-family residences and generates noise typical of rural residential uses. Under the No Project/No Development Alternative, the project site would remain as-is, with the four residences. The noise associated with demolition, construction and operation of the proposed project would not occur. Significant impacts associated with rock drilling would not occur under this alternative (Impact N-1). As such, noise impacts under this alternative would be reduced as compared to the project. No noise impacts would occur under the No Project/No Development Alternative.

Population and Housing

The project site is currently developed with four residences. The No Project/No Development Alternative would not result in any additional population growth in the area, as no additional residential units would be constructed. As described in Section 3.12, the proposed project would add an additional 307 people on site but would not result in substantial population growth in the area. No additional residents or housing would be added to the site under the No Project/No Development Alternative. Therefore, this alternative would not result in a net increase of 98 residential units to contribute toward the City's Regional Housing Needs Assessment (RHNA) allocation. Because this alternative does not increase population on site beyond the current allowable residential uses on site, impacts would be reduced compared to the proposed project. No population and housing impacts would occur under the No Project/No Development Alternative.

Public Services

The No Project/No Development Alternative would not result in an increase in demand for public services, since no additional residences would be developed and there would not be additional residents moving into the area. Specifically, the No Project/No Development Alternative would not increase the demand for police and fire protection services, nor would this alternative increase demand for park, school, and library services. As stated in Section 3.13, public service impacts for the proposed project would be less than significant. Since this alternative would not result in additional residents on site, impacts on public services would be reduced, compared to the proposed project. No public services impacts would occur under the No Project/No Development Alternative. Under this alternative, the developer would not pay the public facilities fees for new development, a portion of which fund public services. Additionally, no school fees would be paid under this alternative.

Recreation

Under the No Project/No Development Alternative, there would not be an increase in demand for park and recreation services. Compared to the proposed project, the No Project/No Development Alternative would decrease impacts and no recreation impacts would occur. Under this alternative, the developer would not pay the public facilities fees for new development, a portion of which go towards funding park and recreation facilities and program. It should be noted that under this alternative, the public pocket park amenity spaces would not be constructed. The project is also creating a public seating area with an historical information board on the project frontage at the corner of North Iris Lane and Robin Hill Lane. This would not be developed under the No Project/No Development Alternative.

Transportation

The No Project/No Development Alternative would not result in the generation of new vehicular trips or result in an increase in vehicle miles traveled (VMT). Since this alternative would not generate any vehicular trips to the local circulation network, it would avoid the significant transportation impact related to VMT. Compared to the proposed project, the No Project/No Development Alternative would eliminate the significant transportation impacts identified for the project. No transportation impact would be identified for the No Project/No Development Alternative.

It should be noted the No Project/No Development Alternative would not provide the roadway and pedestrian improvements on North Iris Lane and Robin Hill Lane that would occur as part of the project. The proposed project would provide a 15-foot right-of-way dedication along the project frontage with North Iris Lane to create a 62-foot right of way, which would allow for wider travel lanes and a 4-foot sidewalk along the project frontage. The applicant would install approximately 850 feet of sidewalk along the project frontage with North Iris Lane. This would complete a missing section of sidewalk along North Iris Lane and improve pedestrian network connectivity for the neighborhood. Robin Hill Lane is currently a private roadway that is 20-feet wide with no sidewalk. Under the proposed project, the project would provide an additional 24-foot easement for a private driveway to provide for two 16-foot travel lanes and a 4-foot sidewalk and parkway on Robin Hill Lane. The project would also install approximately 440 feet of sidewalk on Robin Hill Lane. Finally, the fee payment to provide pedestrian safety enhancement at five intersections in the City and the fair share fee payment for the widening of a segment of North Iris Lane to improve LOS would not be realized under this alternative.

Utilities and Service Systems

Under the No Project/No Development Alternative, no additional residences would be built on the project site. As such, there would be no increase in demand for water service, wastewater service, stormwater capacity, energy, and solid waste handling services. As discussed in Section 3.16., project impacts related to utilities and services systems were determined to be less than significant. Because no additional development would occur under this alternative, the demand for utilities would be eliminated. Thus, impacts to utilities and service systems would be reduced compared to the proposed project. No utilities and service system impacts would occur for the No Project/No Development Alternative.

It should be noted that under the No Project/No Development there would be no undergrounding of the five existing SDG&E power poles along North Iris Lane. Four of the poles are along the project frontage and one pole is located approximately 60 feet north of the project site on North Iris Lane. The undergrounding of these poles would provide for pedestrian improvements along the project frontage.

Conclusion

Since the No Project/No Development Alternative would not develop any additional homes on the project site, overall impacts would be less than with the proposed project or eliminated entirely. There are some benefits of the project that would not be realized under this alternative, including stormwater infrastructure, provision of a net 98 residential units which contribute towards the City's RHNA allocation, recreational amenities, roadway and pedestrian improvements, and undergrounding of SDG&E power poles. Under this alternative there would not be any payment of public facility fees for residential development which goes toward supporting variety of services and improvements in the City. Finally, this alternative would not meet any of the project objectives (Table 5-1).

5.3.4 No Project/Existing Escondido General Plan Land Use Designation Alternative

Under the No Project/Existing Escondido General Plan Land Use Alternative, the project site would be annexed into the City of Escondido and developed consistent with the existing Escondido General Plan Designation of Suburban (S). The Suburban (S) designation allows up to 3.3 dwelling units per acre and has a zoning requirement of R-1-10 or higher. Therefore, this alternative assumes up to 23 single-family units would be developed on the approximately 6.98-acre (net) site. Under this alternative the project would annex into the city and the existing on-site septic would be abandoned and removed during demolition. Future development would be served by the city for sewer service. It is assumed the entire site would be developed under this alternative, including demolition of the four existing structures on site to provide for a more orderly development of 23 single-family units. This alternative assumes that the same infrastructure improvements would be provided including stormwater infrastructure, roadway and pedestrian improvements, and undergrounding of SDG&E power poles.

Vehicular trips under the No Project/Existing Escondido General Plan Land Use Alternative would be reduced by approximately 72% compared to the proposed project. This alternative would generate approximately 230 ADT (23 units X 10 ADT per unit) compared to the 816 ADT anticipated for the project.

5.3.4.1 Comparison of the Effects of the No Project/Existing Escondido General Plan Land Use Designation Alternative to the Proposed Project

Aesthetics

The No Project/Existing Escondido General Plan Land Use Alternative develop the site with single family residential units. These residential units would be detached and the overall development density would be less than the compared project. Buildings would be shorter in height than the buildings proposed under the project and would be consistent in character with the single family residences to the south and west of the project site. Development under this alternative would bring additional lighting to the project site. Lighting would be required to comply with Article 35 of the City's Zoning Ordinance which requires all exterior lighting fixtures, with the exception of streetlamps, to be aimed or shielded so that unnecessary nighttime lighting and glare are reduced. Compared to the proposed project, this alternative would reduce aesthetics impacts. Impacts under both this alternative and the proposed project would be less than significant.

Air Quality

Under the No Project/Existing Escondido General Plan Land Use Alternative, air emissions associated with project construction including emissions associated with demolition, blasting, grading, site preparation, site finishing and building finishing would still occur. Construction emissions, particularly those related to building finishing would be reduced since there would be fewer units developed.

Operational emissions under this alternative would be similar to the project, since a similar use is proposed, but since fewer residential units would be constructed, area source emissions would be proportionally decreased. Vehicular trips under the No Project/Existing Escondido General Plan Land Use Alternative would be reduced by approximately 72% compared to the proposed project. This alternative would generate approximately 230 ADT compared to the 816 ADT anticipated for the project. This results in a corresponding reduction in vehicular related air emissions. Compared to the proposed project, air emissions would be less under the No Project/Existing Escondido General Plan Land Use Alternative and similar to the proposed project, impacts would be less than significant.

Biological Resources

The No Project/Existing Escondido General Plan Land Use Alternative would have a similar level of biological resources impacts as the proposed project, since it would have a similar footprint of disturbance. This would include the potential impact to nesting birds, 2.5 acres of non-native grassland, 0.1 acre of disturbed wetland, jurisdictional wetlands and non-wetland waters, mature and protected trees and the potential for infectious tree diseases. Biological resources mitigation measures identified for the proposed project would be applicable to this alternative (MM-BIO-1 through MM-BIO-5) and would reduce the impacts to below a level of significance. This No Project/Existing Escondido General Plan Land Use Alternative would have a similar level of biological resources impacts as the proposed project.

Cultural Resources/Tribal Cultural Resources

The No Project/Existing Escondido General Plan Land Use Alternative would result in similar ground disturbance as the proposed project. Therefore, potential to impact unknown archaeological resources potentially located within the project site (Impact CR-1) as well as unidentified human remains (Impact CR-2) would still occur. Cultural resources mitigation measures identified for the proposed project (MM-CR-1 through MM-CR-10) would be applicable to this alternative and would reduce the impacts to below a level of significance. This No Project/Existing Escondido General Plan Land Use Alternative would have a similar level of cultural resources impacts as the proposed project.

Energy

Under the No Project/Existing Escondido General Plan Land Use Alternative, construction-related energy use would be similar as the proposed project as demolition, grading, blasting, and building finishing would still be required. This alternative would reduce the number of residential units, so the operational energy demand would be less under this alternative compared to the proposed project. Additionally, since this alternative would reduce trip generation by 72% compared to the proposed project, fuel use would be lower under this alternative. Compared to the proposed project, energy demand would be reduced under the No Project/Existing Escondido General Plan Land Use Alternative and similar to the proposed project, energy impacts would be less than significant.

Geology and Soils

Under the No Project/Existing Escondido General Plan Land Use Alternative, the site would still be fully developed. Therefore, the potential to impact paleontological resources (Impact GEO-1) would still be possible under this alternative. The mitigation measure identified for the proposed project would be applicable to this alternative (MM-GEO-1) and would reduce the potential impact to below a level of significance. This alternative would also require abiding by geological recommendations, such as the ones identified in the geotechnical evaluation. Compared to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would result in the same level of impacts to geology and soils.

Greenhouse Gas Emissions

Under the No Project/Existing Escondido General Plan Land Use Alternative, GHG emissions associated with project construction including emissions associated with demolition, blasting, grading, site preparation, site finishing and building finishing would still occur. Construction emissions, particularly those related to building finishing would be reduced since there would be fewer units developed. Operationally, greenhouse gas emissions would be lower for this alternative than the

proposed project since there would be fewer units developed and fewer vehicle trips generated. Because of the reduction of residential units from 102 to 23, GHG emissions associated with energy use, solid waste decomposition and water use, wastewater treatment and conveyance would be lower under this alternative. Additionally, vehicular trips would be reduced by 72% from 816 ADT to 230 ADT under this alternative. This results in a corresponding reduction in vehicular related GHG emissions. Emissions from vehicles typically account for the largest portion of greenhouse gas emissions. Compared to the proposed project, GHG emissions would be reduced under the No Project/Existing Escondido General Plan Land Use Alternative and similar to the proposed project, GHG impacts would be less than significant. This alternative would also be required to implement all of the required CAP measures.

Hazards and Hazardous Materials

The project site is currently developed with four residential units constructed in the 1960s. Similar to the proposed project, construction and operation of residential uses under this alternative would not be expected to result in the release of any significant hazardous materials or the routine transport, use, or disposal of such materials. Similar to the proposed project, development under this alternative would not result in any safety hazards resulting from proximity to the McClellan-Palomar and Ramona Airports, nor would this alternative impair implementation of or physically interfere with emergency response or evacuation plans. Development of this alternative would still have the same potential for accidental release of asbestos containing materials and lead based paint should demolition of the existing residences occur (Impact HAZ-1). Similarly, while the site is not listed on any hazardous materials sites, the undocumented fill present on site could contain contaminated soils (Impact HAZ-2). Hazardous Materials mitigation measures identified for the proposed project (MM-HAZ-1a, MM-HAZ-1b and MM-HAZ-2) would be applicable to this alternative and would reduce the impacts to below a level of significance. Impacts related to hazards and hazardous material for the No Project/Existing Escondido General Plan Land Use Alternative would be similar to the proposed project and impacts would be mitigated to below a level of significance.

Hydrology and Water Quality

The No Project/Existing Escondido General Plan Land Use Alternative would result in similar ground disturbance to the site. As such, this alternative would introduce impervious surfaces at the site, similar to the proposed project. The existing on-site hydrologic conditions, drainage patterns, and drainage volumes would be modified. It is expected that this alternative would also incorporate all required and applicable best management practices in order to avoid any violations of water quality standards or otherwise modify or adversely affect surface and groundwater quality. As compared to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would result in similar impacts and the impacts would be less than significant.

Land Use and Planning

Under the No Project/Existing Escondido General Plan Land Use Alternative, annexation would still be required to bring the project site into the City. The site would be developed consistent with the existing Escondido General Plan Designation of Suburban (S). The Suburban (S) designation allows up to 3.3 dwelling units per acre and approximately 23 single family residences would be developed under this alternative. Due to the reduced development under this alternative and the associated reduced trip generation, it is likely that this alternative would avoid the project effect on North Iris Lane between Robin Hill Lane and City Centre Parkway under the existing, near term and long term scenarios. This segment currently operates at LOS E and the project would contribute vehicles to the segment which

results in a project effect. As such, fair share contribution for roadway network improvements to offset the project's contribution to the effect would not be required. Development under this alternative would not result in the division of a community. Sidewalks would still be required to be constructed along the project frontage with North Iris Lane and Robin Hill Lane under this alternative. Similar to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would have a less than significant land use impact.

Noise

Construction-related noise under the No Project/Existing Escondido General Plan Land Use Alternative is expected to be similar to the proposed project, since demolition, blasting and grading activities would still be required, and similar types of equipment would be used. If rock drilling is required within 160 feet of the property line, the significant noise impact would still occur under this alternative (Impact N-1) and mitigation measure MM-N-1 would still be required to be implemented.

Operational noise generated under the No Project/Existing Escondido General Plan Land Use Alternative would be reduced compared to the proposed project since fewer residential units would be developed. Additionally, there would be an approximate 72% reduction in ADT from 816 to 230 under this alternative. Compared to the proposed project, noise impacts would be less under No Project/Existing Escondido General Plan Land Use Alternative and similar to the proposed project would be less than significant.

Population and Housing

The No Project/Existing Escondido General Plan Land Use Alternative would develop the site in a manner that is consistent with the City's General Plan and would, therefore, have been considered in the City's growth assumptions. The proposed project would increase the population by approximately 307 residents. However, this increase was determined to be less than significant. The No Project/Existing Escondido General Plan Land Use Alternative would increase the population by approximately 59 residents due to the construction of 23 homes on the site (19 new homes net, since there are four existing residences on the project site). The No Project/Existing Escondido General Plan Land Use Alternative would not create new market rate/work force housing on the project site nor contribute as fully to the City's RHNA requirement for additional units. Compared to the proposed project, this alternative would have a similar level of impact and impacts would be less than significant.

Public Services

Similar to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would result in an increase in demand for public services, due to the construction of additional residential uses on the project site. Specifically, this alternative would increase the demand for police and fire protection services, as well as schools, park, and library services over existing conditions. However, because this alternative would result in fewer residential units and a smaller population increase, the impacts to public services would be reduced compared to the proposed project. This alternative would generate fewer students for Escondido Union School District (EUSD) and Escondido Union High School District (EUHSD). Development under this alternative would still be required to pay applicable public facilities fees for residential development and school fees, although the payment would be less. Similar to the proposed project, impacts from development of the No Project/Existing Escondido General Plan Land Use Alternative would be less than significant.

Recreation

Similar to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would result in an increase in demand for recreational amenities, due to the construction of additional residential uses on the project site. However, because this alternative would result in fewer residential units and a smaller population increase, the impacts to recreation would be reduced compared to the proposed project. Development under this alternative would still be required to pay applicable public facilities fees for residential development, a portion of which fund city-wide park and recreation amenities and services, although the payment would be less. Additionally, this alternative would be required to provide common open space and private open space per City requirements. Similar to the proposed project, impacts from development of the No Project/Existing Escondido General Plan Land Use Alternative would be less than significant.

Transportation

Under the No Project/Existing Escondido General Plan Land Use Alternative, the project would develop 23 single family residences and generate approximately 230 ADT. Compared to the proposed project, this is a 72% reduction in ADT. Under this alternative roadway and pedestrian improvements on North Iris Lane and Robin Hill Road would still occur. This alternative would not result in significant impacts related to conflicts with policies addressing circulation system, traffic hazards, or emergency access.

Since the No Project/Existing Escondido General Plan Land Use Alternative would generate more than 200 ADT, a focused VMT analysis would be required. Given the site's suburban location and proposal for residential uses under this alternative, VMT impacts are still anticipated under this alternative and mitigation would be required. Overall trip generation would decrease by 72% under this alternative. It is assumed that the roadway and pedestrian infrastructure improvements on North Iris Lane and Robin Hill Lane would still occur under this alternative and that contributions towards pedestrian safety enhancement at offsite intersections would still be required, though at a reduced amount. In summary, this alternative would have a similar level of impact as the proposed project.

Utilities and Service Systems

Similar to the proposed project, the No Project/Existing Escondido General Plan Land Use Alternative would result in an increase in utilities and service systems, including water, wastewater, stormwater infrastructure, and solid waste service over existing conditions through the development of new residential units. Compared to the project, this alternative would decrease the demand for water and sewer service, and generate less solid waste due to fewer residential units, but would still be required to pay all applicable water and sewer fees. Storm water infrastructure is anticipated to be similar as the proposed project as a similar amount of impervious surface would be created. Utilities and service system impacts would be less than significant under the No Project/Existing Escondido General Plan Land Use Alternative. The No Project/Existing Escondido General Plan Land Use Alternative would not create new market rate/work force housing on the project site nor contribute as fully to the City's RHNA requirement for additional units. This alternative would reduce solid waste generation and water and sewer demand compared to the proposed project.

Conclusion

The No Project/Existing Escondido General Plan Land Use Alternative would result in a less intensive use on the project site with 79 fewer residential units than the proposed project and 72% fewer ADT (230 ADT compared to 816 ADT). This results in a corresponding proportional decrease in air and

greenhouse gas emissions and noise from vehicles compared to the proposed project. Footprint-specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be similar as the proposed project as the same amount of site area would be disturbed. This alternative would generate fewer students for EUSD and EUHSD and would reduce demand for public services (fire, police, recreation, libraries) and utilities (solid waste, water and sewer service) compared to the proposed project. The No Project/Existing Escondido General Plan Land Use Alternative would still have a significant VMT impact and mitigation would be required to reduce the impact to below a level of significance. The No Project/Existing Escondido General Plan Land Use Alternative could meet two of the project objectives but fails to meet three of the objectives, as shown in Table 5-1.

5.3.5 No Project/Existing San Diego County General Plan Land Use Designation Alternative

Under the No Project/Existing San Diego County General Plan Land Use Designation Alternative, the site would not annex into the City and would be developed in accordance with the County's General Plan designation on the site. The site is designated as Village Residential (VR-24) in the County's General Plan, which allows for up to 24 dwelling units per acre. This means the 6.98-acre (net) site could be developed with up to 167 units. Vehicular trips under the No Project/Existing San Diego County General Plan Designation Alternative would generate 1,002 ADT (167 X 6 ADT). This is an increase of 186 ADT compared to the prosed project (816 ADT). This represents a 23% increase in trip generation.

Development on the site while remaining in the County would require an out-of-jurisdiction service agreement with the City of Escondido for sewer. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted since the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. However, in the past the City has not provided out-of-jurisdiction service agreements absent a health emergency.

5.3.5.1 Comparison of the No Project/Existing San Diego County General Plan Land Use Designation Alternative to the Proposed Project

Aesthetics

The No Project/Existing San Diego County General Plan Land Use Alternative would develop the project site with up 167 multi-family homes. It is anticipated buildings would be up to four stories tall and 60 feet in height. Compared to the proposed project, development under this alternative would be denser, with taller buildings and would not be consistent with the building heights and development intensities in the project vicinity. Architectural enhancement, thoughtful building placement and a comprehensive landscaping program would be required to soften the bulk and scale under this alternative. Similar to the proposed project, this alternative would incorporate lighting for safety, security and way finding. Lighting would be required to comply with Section 51.204 of the San Diego Code of Regulatory Ordinances which addresses light pollution and the shielding of outdoor lighting so that unnecessary nighttime lighting and glare are reduced. The No Project/Existing Land Use Alternative would have an increased level of aesthetics impact as the proposed project however those impacts would be less than significant.

Air Quality

Under the No Project/Existing San Diego County General Plan Land Use Alternative, air emissions associated with project construction including emissions associated with blasting, grading, site

preparation, site finishing and building finishing would still occur and would be similar to those anticipated for the project. Construction emissions, particularly those associated with building finishing would be increased since this alternative includes 65 more residential units, compared to the proposed project.

Vehicular trips under the No Project/Existing San Diego County General Plan Land Use Alternative would be increased by approximately 23% compared to the proposed project. This alternative would generate approximately 1,002 ADT compared to the 816 ADT anticipated for the project. This results in a corresponding increase in vehicular related air emissions. Compared to the proposed project, air emissions would be greater under this alternative but similar to the proposed project, impacts would still be less than significant.

Biological Resources

The No Project/Existing San Diego County General Plan Land Use Alternative would have a similar level of biological resources impacts as the proposed project, since it would have a similar footprint of disturbance. This would include the potential impact to nesting birds, 2.5 acres of non-native grassland, 0.1 acre of disturbed wetland, impacts to jurisdictional wetlands and non-wetland waters impact to mature and protected trees and the potential for infectious tree diseases. Biological resources mitigation measures identified for the proposed project would be applicable to this alternative (MM-BIO-1 through MM-BIO-5) and would reduce the impacts to below a level of significance. The No Project/Existing San Diego County General Plan Land Use Alternative would have a similar level of biological resources impacts as the proposed project.

Cultural Resources /Tribal Cultural Resources

The No Project/Existing San Diego County General Plan Land Use Alternative would result in similar ground disturbance as the proposed project. Therefore, potential to impact unknown archaeological resources potentially located within the project site (Impact CR-1) as well as unidentified human remains (Impact CR-2) would still occur. Cultural resources mitigation measures identified for the proposed project (MM-CR-1 through MM-CR-10) would be applicable to this alternative and would reduce the impacts to below a level of significance. This No Project/Existing San Diego County General Plan Land Use Alternative would have a similar level of cultural resources impacts as the proposed project.

Energy

Under the No Project/Existing San Diego County General Plan Land Use Alternative construction-related energy use would be similar as the proposed project as demolition, grading, blasting, and building finishing would still be required. This alternative would increase the number of residential units, so the operational energy demand would be greater under this alternative compared to the proposed project. Additionally, since this alternative would increase trip generation by 23% compared to the proposed project, fuel use would be increased under this alternative. Compared to the proposed project, energy demand would be greater under the No Project/Existing San Diego County General Plan Land Use Alternative, but similar to the proposed project, energy impacts would still be less than significant.

Geology and Soils

Under the No Project/Existing San Diego County General Plan Land Use Alternative the site would still be fully developed. Therefore, the potential to impact paleontological resources (Impact GEO-1) would

still be possible under this alternative. The mitigation measure identified for the proposed project would be applicable to this alternative (MM-GEO-1) and would reduce the potential impact to below a level of significance. This alternative would also require abiding by geological recommendations, such as the ones identified in the geotechnical evaluation. Compared to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would result in the same level of impacts to geology and soils.

Greenhouse Gas Emissions

Under the No Project/Existing San Diego County General Plan Land Use Alternative, GHG emissions associated with project construction including emissions associated with demolition, blasting, grading, site preparation, site finishing and building finishing would still occur. Construction emissions, particularly those related to building finishing would be increased since there would be 75 additional units developed. Operationally, greenhouse gas emissions would be greater for this alternative than the proposed project since there would be more units developed and greater vehicle trips generated. Because of the increase in residential units from 102 to 167, GHG emissions associated with energy use, solid waste decomposition and water use, wastewater treatment and conveyance would be greater under this alternative. Additionally, vehicular trips would be increased by 23% from 816 ADT to 1,002 ADT under this alternative. This results in a corresponding increase in vehicular related air emissions. Emissions from vehicles typically account for the largest portion of greenhouse gas emissions. Compared to the proposed project, GHG emissions would be greater under the No Project/Existing San Diego County General Plan Land Use Alternative. Development under this alternative would be required to implement all CAP measures and may be required to implement additional GHG reduction measures to decrease GHG emission to below a level of significance.

Hazards and Hazardous Materials

The project site is currently developed with four residential units constructed in the 1960s. Similar to the proposed project, construction and operation of residential uses under this alternative would not be expected to result in the release of any significant hazardous materials or the routine transport, use, or disposal of such materials. Similar to the proposed project, development under this alternative would not result in any safety hazards resulting from proximity to the McClellan-Palomar and Ramona Airports, nor would this alternative impair implementation of or physically interfere with emergency response or evacuation plans. Development of this alternative would still have the same potential for accidental release of asbestos containing materials and lead based paint should demolition of the existing residences occur (Impact HAZ-1). Similarly, while the site is not listed on any hazardous materials sites, the undocumented fill present on the site could contain contaminated soils (Impact HAZ-2). Hazardous Materials mitigation measures identified for the proposed project (MM-HAZ-1a, MM-HAZ-1b and MM-HAZ-2) would be applicable to this alternative and would reduce the impacts to below a level of significance. Impacts related to hazards and hazardous material would be similar for the No Project/Existing San Diego County General Plan Land Use Alternative to the proposed project and impacts would be mitigated to less than significant.

Hydrology and Water Quality

The No Project/Existing San Diego County General Plan Land Use Alternative would result in similar ground disturbance to the site. As such, this alternative would introduce impervious surfaces at the site, similar to the proposed project. The existing on-site hydrologic conditions, drainage patterns, and drainage volumes would be modified. It is expected that this alternative would also incorporate all required and applicable best management practices in order to avoid any violations of water quality

standards or otherwise modify or adversely affect surface and groundwater quality. As compared to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would result in similar impacts and the impacts would be less than significant.

Land Use and Planning

Under the No Project/Existing San Diego County General Plan Land Use Alternative, annexation, a General Plan Amendment and Prezone would not be required. Development would occur consistent with the Village Residential (VR-24) designation, as identified in the County's General Plan. Up to 167 units could be developed under this alternative.

Due to the increase development intensity under this alternative and the associated increased trip generation, it is likely that this alternative would result in additional project effects on area roadways and/or intersections through reduced level of service. Fair share contribution for roadway network improvements to offset the contribution of traffic under this alternative would still be required and would likely be more than the contribution identified for the project. Development under this alternative would not result in the division of a community. Sidewalks would still be required to be constructed along the project frontage with North Iris Lane and Robin Hill Lane under this alternative. Similar to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative, would have a less than significant land use impact.

Noise

Construction-related noise under the No Project/Existing San Diego County General Plan Land Use Alternative is expected to be similar to the proposed project, since demolition, blasting and grading activities would still be required, and similar types of equipment would be used.

Operational noise generated under the No Project/Existing San Diego County General Plan Land Use Alternative would be increased compared to the proposed project since 65 more residential units would be developed. This alternative would generate approximately 23% more ADT as the project (1.002 ADT compared to the 816 ADT). Therefore, offsite noise generated by the project would be higher under this alternative than the proposed project; however, the increase is not anticipated to be significant given the amount of traffic that is already on area roadways. Compared to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would have a similar level of impact as the proposed project and all noise impacts would be less than significant.

Population and Housing

The No Project/Existing San Diego County General Plan Land Use Alternative would develop the site in a manner that is consistent with the County's General Plan and would, therefore, have been considered in the County's growth assumptions. The proposed project would increase the population by approximately 307 residents, which was determined to be less than significant. The No Project/Existing San Diego County General Plan Land Use Alternative would increase the population by approximately 490 residents due to the construction of 167 homes on the site (163 new homes net, since there are four existing residences on the project site). Similar to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would contribute to the area's need for additional housing by creating market rate/work force housing on the project site. Compared to the proposed project, this alternative would have a similar level of impact and impacts would be less than significant.

Public Services

Similar to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would result in an increase in demand for public services, due to the construction of additional residential uses on the project site. Specifically, this alternative would increase the demand for police and fire protection services, as well as schools, park, and library services over existing conditions. However, because this alternative would result in a greater number of residential units and a larger population increase, the impacts to public services would be greater when compared to the proposed project. Development under this alternative would still be required to pay applicable school fees to the school districts. Development fees consist with County of San Diego requirements would be applicable to this alternative. Similar to the proposed project, impacts from development of the No Project/Existing San Diego County General Plan Land Use Alternative would be less than significant.

Recreation

Similar to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would result in an increase in demand for recreational amenities, due to the construction of additional residential uses on the project site. However, because this alternative would result in a greater number of residential units and a larger population increase, the impacts to recreation would be increased when compared to the proposed project. Development fees consist with County of San Diego requirements would be applicable to this alternative. Similar to the proposed project, impacts from development of the No Project/Existing San Diego County General Plan Land Use Alternative would be less than significant.

Transportation

Under the No Project/Existing San Diego County General Plan Land Use Alternative, the project would generate 1.002 ADT, a 23% increase compared to the proposed project. Since this alternative would be in the County of San Diego jurisdiction, the County's guidelines for traffic impact analysis would apply. The County is currently finalizing their Transportation Study Guidelines (TSG). Per the draft TSG, since this alternative would generate more than 500 ADT, a full Local Mobility Analysis (LMA) would be required (County of San Diego 2022). Additionally, a VMT analysis would be required. Similar to the proposed project, VMT impacts would be expected under this alternative. Mitigation measures would be required to reduce VMT to 15% below the regional average. Quantification of the VMT reductions would be based upon methods outlined in the *California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (GHG Handbook)* (CAPCOA 2021). The County will also be looking into other ways to offset VMT through options such as VMT fee programs, VMT mitigation banking, and VMT exchange programs. None of these alternative VMT mitigation programs are in place at this time. Therefore, the No Project/Existing San Diego County General Plan Land Use Alternative would have a significant and unmitigated transportation impact. Additionally, this alternative would require more VMT-reduction mitigation compared to the project.

Utilities and Service Systems

Similar to the proposed project, the No Project/Existing San Diego County General Plan Land Use Alternative would result in an increase in utilities and service systems, including water, wastewater, stormwater infrastructure, and solid waste service over existing conditions through the development of new residential units. Compared to the project, this alternative would increase the demand for water and sewer service, and generate more solid waste due to greater residential units, but impacts would

still be expected to be less than significant through payment of all required water and sewer fees. Storm water infrastructure is anticipated to be similar as the proposed project as a similar amount of impervious surface would be created. While the No Project/Existing San Diego County General Plan Land Use Alternative would increase demand for utilities and service systems, similar to the proposed project, impacts would be less than significant.

Conclusion

The No Project/Existing San Diego County General Plan Land Use Alternative would result in higher density on the project site, resulting in 65 more residential units and 23% more trip generation compared to the proposed project (1,002 ADT compared to 816 ADT). This results in a corresponding proportional increase in air and greenhouse gas emissions and noise from vehicles compared to the proposed project. Footprint-specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be similar as the proposed project as the same amount of site area would be disturbed. This alternative would generate more students for EUSD and EUHSD and would increase demand for public services (fire, police, recreation, libraries) and utilities (solid waste, water and sewer service) compared to the proposed project. This alternative would result in a significant and unmitigated impact related to VMT. As shown in Table 5-1, this alternative would meet all but one of the project objectives: annexation into the City of Escondido. As discussed above, development on the site while remaining in the County may be infeasible. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted since the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. Development on the site while remaining in the County would require an out-of-jurisdiction service agreement with the City of Escondido for sewer. Per Section 68.310 of the San Diego County Code of Regulatory Ordinances, onsite septic would not be permitted since the project site is within 200 feet of a public sewer. Public sewer is located adjacent to the site within North Iris Road. However, in the past the City has not provided out-of-jurisdiction service agreements absent a health emergency.

5.3.6 Reduced Footprint Alternative

The Reduced Footprint Alternative was developed to avoid impacts to the wetland and channelized drainage area on the project site and would also incorporate a 50-foot buffer from the wetlands. This would reduce impacts to biological resources/jurisdictional resources. Development would be focused in the northern and north-central portion of the project site. This alternative would construct approximately 82 multifamily units. Annexation into the City would be required for this alternative.

Vehicular trips under this alternative would be reduced compared to the proposed project. This alternative would generate 656 ADT. Compared to the proposed project, which generates 816 ADT, this alternative would reduce ADT by approximately 20%.

5.3.6.1 Comparison of the Effects of the Reduced Footprint Alternative to the Proposed Project

Aesthetics

Development under the Reduced Footprint Alternative would still develop three-story high multifamily residential building and open space acres. Compared to the proposed project, there would be less overall development on the project site. Similar to the proposed project, this alternative would incorporate lighting for safety, security and way finding. Lighting would be required to comply with Article 35 of the City's Zoning Ordinance which requires all exterior lighting fixtures, with the exception

of streetlamps, to be aimed or shielded so that unnecessary nighttime lighting and glare are reduced. The Reduced Footprint Alternative would have a similar level of aesthetics impact as the proposed project and those impacts would be less than significant.

Air Quality

Under the Reduced Footprint Alternative, air emissions associated with construction including emissions associated with demolition, grading, site preparation, site finishing and building finishing would still occur. Construction emissions would be reduced, since the overall footprint of disturbance would be less so less earthwork activity would be required and less housing units would be developed.

Operational emissions under this alternative would be similar to the project, since a similar use is proposed, but since fewer residential units would be constructed, area source emissions would be proportionally decreased. Vehicular trips under the Reduced Footprint Alternative would be reduced by approximately 20% compared to the proposed project. This alternative would generate 656 ADT compared to the 816 ADT anticipated for the project. This results in a corresponding reduction in vehicular related air emissions. Compared to the proposed project, air emissions would be less under the Reduced Footprint alternative. Similar to the proposed project, air quality impacts would be less than significant.

Biological Resources

The Reduced Footprint Alternative would result in less site disturbance since a smaller area would be graded. This alternative was designed to avoid impacts to the wetland and channelized drainage area on the project site and would also incorporate a 50-foot buffer from the wetlands. This alternative would still have the potential to impact nesting birds, non-native grassland, mature and protected trees, and the potential for infectious tree diseases. Most of the biological resources mitigation measures identified for the proposed project would still be applicable to this alternative (MM-BIO-1, MM-BIO-2, MM-BIO-4, and MM-BIO-5) and would reduce the impacts to below a level of significance. This alternative would reduce the impacts to disturbed wetlands and jurisdictional resources compared to the proposed project. Similar to the proposed project, the Reduced Footprint Alternative would reduce biological resources impacts to below a level of significance.

Cultural Resources/Tribal Cultural Resources

The Reduced Footprint Alternative would result in less ground disturbance as the proposed project. However, the potential to impact unknown archaeological resources potentially located within the project site (Impact CR-1) as well as unidentified human remains (Impact CR-2) would still occur. Cultural resources mitigation measures identified for the proposed project (MM-CR-1 through MM-CR-10) would be applicable to this alternative and would reduce the impacts to below a level of significance. The Reduced Footprint Alternative would have a slightly reduced level of potential impacts to cultural resources compared to the project because less of the site would be graded. Similar to the proposed project, impacts would be mitigated to below a level of significance.

Energy

Under the Reduced Footprint Alternative, construction-related energy use would be similar as the proposed project as demolition, grading, blasting, and building finishing would still be required. However, energy use associated with operation of the Reduced Footprint Alternative would be less compared to the proposed project since the number of units would be decreased from 102 units to 82 units. Similarly, energy use associated with vehicle fuel would be reduced since this alternative

would reduce the number of trips by 20%. Compared to the proposed project, the Reduced Footprint Alternative reduces the amount of energy used and similar to the proposed project, energy impacts would be less than significant.

Geology and Soils

Under the Reduced Footprint Alternative, the majority of the site would still be developed except for the wetland/drainage area on the project site and surrounding buffer. Therefore, the potential to impact paleontological resources (Impact GEO-1) would still be possible under this alternative. The mitigation measure identified for the proposed project would be applicable to this alternative (MM-GEO-1) and would reduce the potential impact to below a level of significance. This alternative would also require abiding by geological recommendations, such as the ones identified in the geotechnical evaluation. Compared to the proposed project, this alternative would result in the same level of impacts to geology and soils.

Greenhouse Gas Emissions

Under the Reduced Footprint Alternative, greenhouse gas emissions associated with project construction would still occur. Operationally, greenhouse gas emissions would be lower for this alternative than the proposed project since there would be fewer units developed and fewer vehicle trips generated. Because of the reduction of residential units from 102 to 82, GHG emissions associated with energy use, solid waste decomposition and water use, wastewater treatment and conveyance would be lower under this alternative. Additionally, vehicular trips would be reduced by 20% from 816 ADT to 656 ADT under this alternative. This results in a corresponding reduction in vehicular related air emissions. Emissions from vehicles typically account for the largest portion of greenhouse gas emissions. Compared to the proposed project, GHG emissions would be reduced under the Reduced Footprint Alternative and similar to the proposed project, GHG impacts would be less than significant. This alternative would also be required to implement all of the required CAP measures.

Hazards and Hazardous Materials

The project site is currently developed with four residential units constructed in the 1960s. Similar to the proposed project, construction and operation of residential uses under this alternative would not be expected to result in the release of any significant hazardous materials or the routine transport, use, or disposal of such materials. Similar to the proposed project development under this alternative would not result in any safety hazards resulting from proximity to the McClellan-Palomar and Ramona Airports, nor would this alternative impair implementation of or physically interfere with emergency response or evacuation plans. Development of this alternative would still have the same potential for accidental release of asbestos containing materials and lead based paint should demolition of the existing residences occur (Impact HAZ-1). Similarly, while the site is not listed on any hazardous materials sites, the undocumented fill present on site could contain contaminated soils (Impact HAZ-2). Hazardous Materials mitigation measures identified for the proposed project (MM-HAZ-1a, MM-HAZ-1b and MM-HAZ-2) would be applicable to this alternative and would reduce the impacts to below a level of significance. Impacts related to hazards and hazardous material for the Reduced Footprint Alternative would be similar to the proposed project and impacts would be mitigated to below a level of significance.

Hydrology and Water Quality

The Reduced Footprint Alternative would result in ground disturbance to the site. As such, this alternative would introduce impervious surfaces at the site, though to a lesser degree compared to the proposed project due to a reduced development footprint. The existing on-site hydrologic conditions, drainage patterns, and drainage volumes would be modified. It is expected that this alternative would also incorporate all required and applicable best management practices in order to avoid any violations of water quality standards or otherwise modify or adversely affect surface and groundwater quality. As compared to the proposed project, this alternative would result in similar impacts and the impacts would be less than significant.

Land Use and Planning

Under the Reduced Footprint Alternative, annexation would still be required to bring the project site into the City. The site would be developed in a manner to avoid impacts to jurisdictional areas on the project site.

While this alternative would reduce the development intensity compared to the project, it is likely that the project effect on North Iris Lane between Robin Hill Lane and City Centre Parkway under the existing, near term and long term scenarios would still occur. This effect is from the addition of traffic to a roadway segment that is already operating at LOS E. As such, fair share contribution for roadway network improvements to offset this alternative's contribution to the effect would still be required. Development under this alternative would not result in the division of a community. Sidewalks would still be required to be constructed along the project frontage with North Iris Lane and Robin Hill Lane under this alternative. Similar to the proposed project, the Reduced Footprint Alternative would have a less than significant land use impact.

Noise

Construction-related noise under the Reduced Footprint Alternative is expected to result in a similar level of noise as the proposed project, since demolition, blasting and grading activities would still be required and similar types of equipment would be used.

Operational noise generated under the Reduced Footprint Alternative would be related to the noise generated on the project site from residential uses as well as trips generated by the project. This alternative would develop 20 fewer residential units and generate less vehicular trips than the proposed project (20% reduction). Therefore, offsite noise generated by the project would be less under this alternative than the proposed project. Compared to the proposed project, this alternative would have a similar level of impact, with a reduction in offsite noise associated with vehicular traffic. Similar to the proposed project, noise impacts would be less than significant.

Population and Housing

The proposed project would increase the population by approximately 307 residents. However, this increase was determined to be less than significant. The Reduced Footprint Alternative would increase the population by approximately 244 residents due to the construction of 82 homes on the site (78 new homes net, since there are four existing residences on the project site). The Reduced Footprint Alternative would create less market rate/work force housing on the project site and would not contribute as fully to the City's RHNA requirement for additional units. Compared to the proposed project, this alternative would have a similar level of impact and impacts would be less than significant.

Public Services

Similar to the proposed project, the Reduced Footprint Alternative would result in an increase in demand for public services due to the construction of additional residential uses on the project site. Specifically, this alternative would increase the demand for police and fire protection services, schools, as well as park, and library services over existing conditions. However, because this alternative would result in fewer residential units and a smaller population increase, the impacts to public services would be reduced compared to the proposed project. Development under this alternative would still be required to pay applicable public facilities fees for residential development and school fees, although the payment would be less due to the corresponding reduction in residential units. Similar to the proposed project, impacts from development of the Reduced Footprint Alternative would be less than significant.

Recreation

Similar to the proposed project, the Reduced Footprint Alternative would result in an increase in demand for park and recreation facilities. However, because this alternative would result in fewer residential units and a smaller population increase, the impacts to recreation would be reduced compared to the proposed project. Development under this alternative would still be required to pay applicable public facilities fees for residential development, a portion of which fund city-wide park and recreation amenities and services, although the payment would be less. Additionally, this alternative would be required to provide common open space and private open space per City requirements. Similar to the proposed project, impacts from development of the Reduced Footprint Alternative would be less than significant.

Transportation

Given the site's suburban location and proposal for residential uses under this alternative, VMT impacts are still anticipated under this alternative and would remain significant and require mitigation. Overall trip generation would decrease by 20% under this alternative. It is assumed that the roadway and pedestrian infrastructure improvements on North Iris Lane and Robin Hill Lane would still occur under this alternative. In summary, this alternative would have a similar level of impact as the proposed project and would require mitigation to reduce VMT-related transportation impacts to below a level of significance.

Utilities and Service Systems

The Reduced Footprint Alternative would result in an increase in utilities and service systems, including water, wastewater, stormwater infrastructure, and solid waste service through the development of 82 residential units. However, compared to the project, this alternative would decrease the overall increase in demand since fewer residences would be constructed. Development under this alternative would still be required to pay all applicable water and sewer fees. Storm water infrastructure is anticipated to be similar as the proposed project as a similar amount of impervious surface would be created. Solid waste generation would be reduced under this alternative. Utilities and service system impacts would be less than significant under the Reduced Footprint Alternative and would reduce solid waste generation, water and sewer demand solid waste generation compared to the proposed project.

Conclusion

The Reduced Footprint Alternative would reduce the number of residential units constructed on the project site by 20 units. This results in a corresponding decrease in vehicular trips by approximately

20% and a corresponding decrease in air and greenhouse gas emissions and noise from offsite traffic compared to the proposed project. Public services, utilities and service systems, and energy demands would also proportionally decrease. Footprint specific impacts, such as those related to biological resources, cultural and tribal cultural resources, geology and soils, and hazards would be less than the proposed project because less ground disturbing activity would be required. This alternative would also avoid impacts to wetland habitat and to jurisdictional wetlands and non-wetland waters. The amount of public facilities fees paid for residential development would be less than compared to the project since fewer residential uses would be constructed. Similarly, the amount of school fees paid would be less under this alternative. This alternative would meet the majority of the project objectives, as detailed in Table 5-1.

5.4 Alternatives Considered But Rejected

State CEQA Guidelines Section 15126.6(c) provides guidance in selecting a range of reasonable alternatives for the project. The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the project. There are many factors that may be taken into account when addressing the feasibility of range of potential alternatives for the project, such as site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). The alternatives discussion shall include those that could feasibly accomplish most of the basic objectives of the project, and could avoid or substantially lessen one or more of the significant effects. The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The EIR need not discuss every alternative to the project. A range of alternatives that are "reasonable" for analysis have been evaluated and are discussed above in Section 5.3, Project Alternatives Considered in this EIR. The following describes other alternatives considered by the City but dismissed from further evaluation in this EIR, and a brief description of the reasons for their rejection.

5.4.1 Alternative Location

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the project. There are sites within the city of an approximately equivalent size to the project site that could be redeveloped with a residential project; however, the project applicant does not control another site within the city of comparable land area that is available for development of the proposed project. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." Because the City is highly urbanized and is largely built out, obtaining another site of a similar size in a similar location is not considered feasible. It should also be noted that the project site is surrounded by development and located adjacent to existing transportation and utility infrastructure. As such, an alternative location was ultimately rejected from further analysis in the EIR.

5.5 Environmentally Superior Alternative

Table 5-1 compares how each of the alternative would meet the various objectives of the proposed project. **Table 5-2** provides a qualitative comparison of the impacts for each alternative compared to the proposed project. As shown in Tables 5-1 and 5-2, the No Project/No Development Alternative would eliminate all of the significant impacts identified for the project. However, the No Project/No Development Alternative would not meet any of the project objectives. CEQA Guidelines Section 15126.6(e)(2) states that if the No Project alternative is identified as the environmentally superior alternative, then an environmentally superior alternative should be identified among the other alternatives.

Among the other alternatives, not including the proposed project, the Reduced Footprint Alternative is the environmentally superior alternative because it would provide a reduced level of impact in some environmental analysis areas including air quality, greenhouse gas, noise, public services, recreation, and utilities/service systems. Additionally, footprint specific impacts, such as those related to cultural and tribal resources, biological resources, and geology and soils would be reduced compared to the proposed project, because less ground disturbing activities would be required. The Reduced Footprint Alternative would avoid the impacts to wetlands habitat and the jurisdictional wetlands and non—wetlands waters. Mitigation measures would still be required to mitigate impacts to biological resources, cultural resources, geology and soils, hazards/hazardous materials, and transportation.

Table 5-1. Summary of Alternatives and Project Objectives

Objective	Proposed Project (102 Units)	No Project/No Development	No Project/Existing Escondido General Plan Land Use Alternative (23 Units)	No Project/Existing San Diego County General Plan Land Use Alternative (167 Units)	Reduced Footprint Alternative (82 Units)
Develop a workforce housing community by providing a range of unit types, sizes, and bedroom numbers thereby accommodating a range of affordability a full spectrum of family demographics to contribute to the growing housing needs of the region.	Meets objective	Does not meet objective	Does not meet objective	Meets objective	Partially meets objective
To the extent possible given the site constraints, maximize the opportunity to provide housing to Escondido using the Urban III land use classification which provides for up to 18 units per acre.	Meets objective	Does not meet objective	Does not meet objective	Meets objective	Does not meet objective
Create high-quality recreational open space opportunities for the residents of all ages to enjoy thereby fostering a healthy community environment.	Meets objective	Does not meet objective	Meets objective	Meets objective	Meets objective
Design a multi-family community with private open space areas for units where families can gather and enjoy healthy indoor-outdoor living.	Meets objective	Does not meet objective	Does not meet objective	Meets objective	Meets objective
Annex the project to the City of Escondido which provides quality infrastructure, public services, and facilities capable of serving the development.	Meets objective	Does not meet objective	Meets objective	Does not meet objective	Meets objective

Table 5-2. Comparison of Impacts of Proposed Project and Alternatives

Environmental Topic	Proposed Project (102 Units)	No Project/No Development Alternative	No Project/Existing Escondido General Plan Land Use Designation Alternative (23 Units)	No Project/Existing San Diego County General Plan Land Use Designation Alternative (167 Units)	Reduced Footprint Alternative (82 Units)
Aesthetics	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Same)
Air Quality	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Biological Resources	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Reduced)
Cultural/Tribal Resources	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Reduced)
Energy	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Geology and Soils	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Same)
Greenhouse Gas Emissions	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Hazards and Hazardous Materials	LTSM	No Impact (Reduced)	LTSM (Same)	LTSM (Same)	LTSM (Same)
Hydrology and Water Quality	LTS	No Impact (Reduced)	LTS (Same)	LTS (Same)	LTS (Same)
Land Use and Planning	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Same)	LTS (Same)
Noise	LTSM	No Impact (Reduced)	LTSM (Reduced)	LTSM (Increased)	LTSM (Reduced)
Population and Housing	LTS	No Impact (Reduced)	LTS (Same)	LTS (Same)	LTS (Same)

Environmental Topic	Proposed Project (102 Units)	No Project/No Development Alternative	No Project/Existing Escondido General Plan Land Use Designation Alternative (23 Units)	No Project/Existing San Diego County General Plan Land Use Designation Alternative (167 Units)	Reduced Footprint Alternative (82 Units)
Public Services	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Recreation	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)
Transportation	LTSM	No Impact (Reduced)	LTSM (Reduced)	SU (Increased)	LTSM (Same)
Utilities and Service Systems	LTS	No Impact (Reduced)	LTS (Reduced)	LTS (Increased)	LTS (Reduced)

Notes: Impact Status: LTS = Less than significant impact; LTSM = Less than significant with mitigation; SU = Significant and unavoidable

6.0 References

Project Description (Section 2.0)

Helix Environmental Planning, Inc. (HELIX). 2022. 2085 North Iris Project Biological Technical Report. April.

Laguna Mountain Environmental. 2021. Cultural Resources Survey Report for the North Iris Lane TM Project, City of Escondido, California. December.

Aesthetics (Section 3.1)

Laguna Mountain Environmental. 2021. Cultural Resources Survey Report for the North Iris Lane TM Project, City of Escondido, California. December.

Caltrans (California Department of Transportation). 2011. Officially Designated State Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways Viewed August 8, 2022.

United States Census Bureau (USCB). 2021. Quick Facts Escondido City, United States. https://www.census.gov/quickfacts/fact/table/US,escondidocitycalifornia/POP010210 Viewed February 9, 2022.

Air Quality (Section 3.2)

California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. October 2000. https://ww2.arb.ca.gov//sites/default/files/classic/diesel/documents/rrpfinal.pdf Viewed March 25, 2021

California Air Resources Board (CARB). 2016. Ambient Air Quality Standards. May 4. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf Viewed September 7, 2021.

City of Escondido Municipal Code. Chapter 33 Zoning, Article 47. Environmental Quality, Division 1. Regulations, Section 33-924. Coordination of CEQA, quality of life standards, and growth management provisions. http://qcode.us/codes/escondido/view.php?version=beta&view=mobile&topic=33-47-1-33_924 Viewed September 7, 2021.

LDN Consulting. 2022a. Air Quality Assessment, Iris Lane Multi-Family Development, City of Escondido, July 26.

LOS Engineering. 2022. Draft Vehicle Miles Traveled and Local Mobility Analysis. September 1.

Office of Environmental Health Hazards Assessment (OEHHA). 2015. Air Toxics Hot Spots Program - Risk Assessment Guidelines - Guidance Manual for Preparation of Health Risk Assessments. February. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf Viewed September 7, 2021

San Diego Air Pollution Control District (SDAPCD). 2005. Measures to Reduce Particulate Matter in San Diego County. December. https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/PM-Measures.pdf Viewed September 7, 2021

San Diego Air Pollution Control District (SDAPCD). 2016. 2016 Regional Air Quality Strategy for San Diego County. December. https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/2016%20RAQS.pdf Viewed September 7, 2021

San Diego Air Pollution Control District (SDAPCD). 2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October. https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/Att%20A%20(Attainment%20Plan)_ws.pdf Viewed September 7, 2021

San Diego Air Pollution Control District (SDAPCD). 2021a. Attainment Status. https://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html Viewed September 7, 2021.

San Diego Air Pollution Control District (SDAPCD). 2021b. Rules & Regulations. https://www.sdapcd.org/content/sdc/apcd/en/Rule_Development/Rules_and_Regulations.html Viewed September 7, 2021

United States Environmental Protection Agency (USEPA). 1995. *EPA-AP 42, Fifth Edition Compilation of Air Pollutant Emission Factors.* https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors Viewed September 7 2021

Biological Resources (Section 3.3)

AMEC Earth & Environmental, Inc., Conservation Biology Institute, Onaka Planning & Economics, and The Rick Alexander Company. 2003. North County Multiple Habitat Conservation Program. March. https://www.sandag.org/index.asp?projectid=97&fuseaction=projects.detail Viewed September 8, 2021

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station. https://www.lrh.usace.army.mil/Portals/38/docs/USACE%2087%20Wetland%20Delineation%20Manual.pdf Viewed September 8, 2021

Google Earth. 2021. Retrieved from: https://earth.google.com/web/

Helix Environmental Planning, Inc. (HELIX). 2022. 2085 North Iris Project Biological Technical Report. April.

Holland, R. F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. October. file:///C:/Users/melys/Downloads/Holland%201986%20Preliminary%20Descriptions%20of%20Terrestrial%20Natural%20Communities.OCRed.pdf%20(1).pdf Viewed September 8, 2021

Lichvar, R.W. and S.M. McColley. 2008. A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States. ERDC/CRREL TR-08-12. Hanover, NH. U.S. Army Engineer Research and Development Center. August.

https://www.spk.usace.army.mil/Portals/12/documents/regulatory/pdf/Ordinary_High_Watermark_Manual_Aug_2008.pdf Viewed September 8, 2021

NETROnline. 2021. Historic Aerials. Retrieved from: https://www.historicaerials.com.

Oberbauer, T., M. Kelly, and J. Buegge. 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," R. F. Holland, Ph.D., October 1986. March. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rtcref/ch9.0/rtcrefaletters/O14%202014-12-19_OberbauerTM2008.pdf Viewed September 8, 2021

Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute. 2001. Public Review Draft Escondido Subarea Plan, Implementing the Multiple Habitat Conservation Program. City Case File 95-25-GPIP. June. https://www.sandag.org/uploads/publicationid/publicationid_151_8113.pdf Viewed September 8, 2021

U.S. Army Corps of Engineers. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual" Arid West Region (Version 2.0). https://usace.contentdm.oclc.org/utils/getfile/collection/p266001coll1/id/7627 Viewed September 8, 2021

Zillow. 2021. Retrieved from: https://www.zillow.com

Cultural Resources/Tribal Cultural Resources (Section 3.4)

City of Escondido. 2012a. City of Escondido General Plan. General Plan. May. Available at: https://www.escondido.org/general-plan-update.aspx.

City of Escondido. 2012b. Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Final Environmental Impact Report. (State Clearinghouse No. 2010071064.)

Laguna Mountain Environmental. 2021. Cultural Resources Survey Report for the North Iris Lane TM Project, City of Escondido, California. December.

Energy (Section 3.5)

California Air Pollution Control Officers Association (CAPCOA). 2010. Quantifying Greenhouse Gas Mitigation Measures. August http://www.capcoa.org/wp-content/uploads/downloads/2010/09/CAPCOA-Quantification-Report-9-14-Final.pdf Viewed May 4, 2021

California Air Resources Board (CARB). 2012. California Air Resources Board Approves Advanced Clean Car Rules. https://ww2.arb.ca.gov/news/california-air-resources-board-approves-advanced-clean-car-rules Viewed March 27,2021.

California Air Resources Board (CARB). 2013. California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley) Accessed December 2017. http://arb.ca.gov/cc/ccms/ccms.htm.

California Air Resources Board (CARB). 2018. EMFAC 2017 Web Database (v1.0.2). https://www.arb.ca.gov/emfac/2017/ Viewed June 4, 2021

California Department of Transportation (CALTrans). 2009. 2008 California Motor Vehicle Stock, Travel and Fuel Forecast. June.

California Energy Commission (CEC). 2014 California Energy Demand Updated Forecast, *2015–2025*. December. https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_13-EnergyConsump/68441_CEC-200-2014-009-SD.pdf Viewed May 6, 2021

California Energy Commission (CEC). 2015. "2016 Building Energy Efficiency Standards Frequently Asked Questions." https://www.energy.ca.gov/sites/default/files/2019-05/2016_Building_Energy_Efficiency_Standards_FAQ.pdf Viewed May 4, 2021

California Energy Commission (CEC). 2017. *2016 Weekly Fuels Watch Report.* http://www.energy.ca.gov/almanac/petroleum_data/fuels_watch/reports/2016_Weekly_Fuels_Watch_RPT.xlsx Accessed December 2017.

California Energy Commission (CEC). 2018. "2019 Building Energy Efficiency Standards Frequently Asked Questions." March https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf Viewed May 4, 2021

California Energy Commission (CEC). 2019. California Energy Consumption Databased. Accessed May 6, 2019. http://www.ecdms.energy.ca.gov/elecbycounty.aspx

California Public Utility Commission (CPUC). 2016. Biennial RPS Program Update. January 1. file:///C:/Users/melys/Downloads/FINAL%2012302015%20Section%20913_6%20Report%20(4).pdf Viewed May 6, 2021

California Public Utility Commission (CPUC). 2021. Natural Gas and California. https://www.cpuc.ca.gov/natural_gas/ Viewed May 5,2021

City of Escondido. 2021a. Climate Action Plan. https://www.escondido.org/climate-action-plan-documents.aspx Viewed September 7. 2021

Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA). 2016. Regulations and Standards: Heavy-Duty. EPA and DOT Finalize Greenhouse Gas and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles. August https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF Viewed September 7, 2021

LDN Consulting. 2022b. Greenhouse Gas Assessment, Iris Lane Multi-Family Development, City of Escondido, July 21.

San Diego Gas & Electric (SDG&E). 2018. 2018 Individual Integrated Resource Plan of San Diego Gas & Electric Company. August 1. https://www.sdge.com/sites/default/files/regulatory/R.16-02-007%20SDGE%20IRP%202018%20Plan%20Final.pdf Viewed May 10,2021

San Diego Gas & Electric (SDG&E). 2021. Our Company. https://www.sdge.com/more-information/our-company Viewed May 4, 2021.

The Climate Registry. 2018. *Default Emission Factors*. May 1. https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf Viewed May 11, 2021

Geology and Soils (Section 3.6)

Atlas Technical Consultants. 2021. Seismic Refraction Study– North Iris Lane Escondido, CA. March 10.

California Department of Conservation (CDC) 2019. EQ Zapp: California Earthquake Hazards Zone Application. https://maps.conservation.ca.gov/cgs/EQZApp/app/ Accessed September 10, 2021.

GEOCON Inc. 2021. Geotechnical Investigation – North Iris Lane Escondido, CA. March 4.

United States Geological Survey (USGS).2016. U.S. Geological Survey's Interactive Quaternary Faults Database. https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf Accessed January 31, 2022

Greenhouse Gas (Section 3.7)

California Air Resources Board (CARB). 2012. California Air Resources Board Approves Advanced Clean Car Rules. https://ww2.arb.ca.gov/news/california-air-resources-board-approves-advanced-clean-car-rules Viewed September 7, 2021.

California Air Resources Board (CARB). 2014. First Update to the AB 32 Scoping Plan. May. https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf Viewed September 7,2021.

California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf Viewed September 7, 2021

California Air Resources Board (CARB). 2020. EMFAC Off-Model Adjustment Factors for Carbon Dioxide (CO2) Emissions to Account for the SAFE Vehicles Rule Part One and the Final SAFE Rule. June 26. https://ww3.arb.ca.gov/msei/emfac_off_model_co2_adjustment_factors_06262020-final.pdf Viewed January 4, 2022.

California Air Resources Board (CARB). 2021a. Senate Bill 375 Regional Plan Climate Targets. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets Viewed September 7, 2021

California Air Resources Board (CARB). 2021b. Advanced Clean Car Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about Viewed September 7, 2021.

California Energy Commission (CEC). 2015. "2016 Building Energy Efficiency Standards Frequently Asked Questions." https://www.energy.ca.gov/sites/default/files/2019-05/2016_Building_Energy_Efficiency_Standards_FAQ.pdf Viewed September 7, 2021

California Energy Commission (CEC). 2018. "2019 Building Energy Efficiency Standards Frequently Asked Questions." March https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf Viewed September 7, 2021

City of Escondido. 2021a. Climate Action Plan. https://www.escondido.org/climate-action-plan-documents.aspx Viewed September 7. 2021

City of Escondido. 2021b. Climate Action Plan Consistency Review Checklist. https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/Final/Escondido_CAPChecklistFinal3.31.2021.pdf Viewed September 7. 2021

Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA). 2016. Regulations and Standards: Heavy-Duty. EPA and DOT Finalize Greenhouse Gas and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles. August https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF Viewed September 7, 2021

IPCC. (2007). IPCC Fourth Assessment Report: Climate Change 2007 : Working Group I: The Physical Science Basis. Chapter 2, Changes in Atmospheric Constituents and in Radiative Forcing. https://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg1-chapter2-1.pdf Viewed September 7, 2001

LDN Consulting. 2022b. Greenhouse Gas Assessment, Iris Lane Multi-Family Development, City of Escondido, July 21.

LOS Engineering. 2022. Draft Vehicle Miles Traveled and Local Mobility Analysis. September 1.

San Diego Association of Governments (SANDAG). 2013. 2050 Series 13 Regional Growth Forecast for City of Escondido. https://datasurfer.sandag.org/download/sandag_forecast_13_jurisdiction_escondido.pdf Viewed September 7, 2021

Hazards and Hazardous Materials (Section 3.8)

American Society for Testing and Materials (ASTM). 2013. Designation E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

CalFire. 2022. Fire Hazard Severity Zone Viewer. https://egis.fire.ca.gov/FHSZ/ Viewed February 2, 2022.

DUDEK. 2022. Fire Protection Plan – Letter Report for the 2085 N. Iris Lane Project. April 18.

GEOCON Incorporated. 2021. Phase I Environmental Site Assessment: Property Southwest of Robin Hill Lane and North Iris Lane Escondido, California. February 18.

Hydrology and Water Quality (Section 3.9)

California Regional Water Quality Control Board, San Diego Region. 2015. Order NO. R9-2015-0100. An Order Amending Order No. R9.2013-001, NPDES NO. CAS010266, As Amended by Order NO. R9-2015-001. National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region. November 18.

https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0100.pdf Viewed January 31, 2022

Carlsbad Watershed Management Area Responsible Agencies. 2021. Carlsbad Watershed Management Area Water Quality Improvement Plan. September. https://projectcleanwater.org/download/carlsbad-wma-wqip-updated-2021/ Viewed January 15, 2021

Carlsbad Watershed Management Area Responsible Agencies. 2021. Carlsbad Watershed Management Area Water Quality Improvement Plan. September http://www.projectcleanwater.org/watersheds/carlsbad-wma/#plan Viewed February 16,2022

City of Escondido. 2016. Escondido Storm Water Design Manual (BMP Design Manual). Adopted January 13; Effective February 16. https://www.escondido.org/Data/Sites/1/media/PDFs/Utilities/SWDesignManual/DesignStandards/AdoptedEscondidoSWDesignManual20160114.pdf?v=2 Viewed January 15, 2022

City of Escondido. 2017. City of Escondido Jurisdictional Runoff Management Plan. January 27. https://www.escondido.org/Data/Sites/1/media/pdfs/pubworks/jrmp/JRMP.pdf?v=6 Viewed January 14, 2022.

Federal Emergency Management Agency (FEMA). 2012. Flood Insurance Rate Map No. 06078C08116 and 06073C0813G. May 16. https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/jf44a11fcf84841c493054a6d2c4f2439/scratch/FIRMETTE_66b5cbdb-035b-43b0-94d2-a8c0d04d9c79.pdf Viewed January 15, 2021

Regional Water Quality Control Board San Diego Region. 2015. Order No. R9-2015-0100. An Order Amending Order No. R9-2013-001, NPDES No. CAS 010266, As Amended by Order No. R9-2015-001. National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region. https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0100.pdf Viewed February 16, 2022.

SB&O. 2022. Preliminary Drainage Report – North Iris Lane. April 25.

SB&O. 2021. Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) For North Iris Lane. December 9.

Land Use and Planning (Section 3.10)

City of Escondido. 2012a. City of Escondido General Plan. General Plan. May. Available at: https://www.escondido.org/general-plan-update.aspx.

City of Escondido. 2012b. Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Final Environmental Impact Report. (State Clearinghouse No. 2010071064.)

County of San Diego. 2011. San Diego County General Plan. August. https://www.sandiegocounty.gov/pds/generalplan.html

Noise (Section 3.11)

California Department of Transportation (Caltrans) 2020. Transportation and Construction Vibration Guidance Manual. April. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf Viewed September 7, 2021

City of Escondido General Plan 2012 Noise Element - Noise Compatibility Guidelines Federal Highway Administration (FHWA). 1978. FHWA Highway Traffic Noise Prediction Model, FHWA-RD-77-108. December. https://www.google.com/books/edition/FHWA_Highway_Traffic_Noise_Prediction_Mo/kTq3ZXpN1uUC?hl=en&gbpv=1&dq=how+to+cite+FHWA+Highway+Traffic+Noise+Prediction+Model,+FHWA-RD-77-108,+December+1978).&pg=PR1&printsec=frontcover Viewed September 8, 2021

Federal Transit Administration (FTA) 2018. Transit Noise and Vibration Impact Assessment Manual. September. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf Viewed September 7, 2021

LDN Consulting. 2012. Aztec Court Noise Monitoring – San Diego.

LDN Consulting. 2022c. Noise Study, Iris Lane Multi-Family Development, Escondido CA. July 27.

LOS Engineering. 2022. Draft Vehicle Miles Traveled and Local Mobility Analysis. September 1.

San Diego County Regional Airport Land Use Commission. 2011a. McClellan-Palomar Airport Land Use Compatibility Plan. https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?Command=Core_Download&EntryId=2991&language=en-US&PortalId=0&TabId=225 Viewed September 8, 2021

San Diego County Regional Airport Land Use Commission. 2011b. Ramona Airport Land Use Compatibility Plan https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?Command=Core_Download&EntryId=2946&language=en-US&PortalId=0&TabId=225 Viewed September 8, 2021

Population and Housing (Section 3.12)

City of Escondido. 2018. City of Escondido Demographics. https://www.escondido.org/demographics Viewed February 17, 2022

City of Escondido. 2022. Sixth Cycle Housing Element 2021-2029. April https://www.escondido.org/Data/Sites/1/media/Planning/HCIS/04.04.22_DraftRevisions.pdf Viewed August 2, 2022

San Diego Association of Governments (SANDAG) 2020. Final 6th Cycle Regional Housing Needs Assessment Plan. July 10. https://www.sandag.org/uploads/projectid/projectid_189_27782.pdf Viewed February 17, 2022

San Diego Association of Governments (SANDAG). 2021. Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern from the 2021 Regional Plan. December https://sdforward.com/docs/default-source/final-2021-regional-plan/appendix-f---regional-growth-forecast-and-scs-land-use-pattern.pdf?sfvrsn=8fc1fd65_2 Viewed February 17, 2022.

Public Services (Section 3.13)

California Department of Education (CDE). 2022. Data Quest: Enrollment Multi-Year Summary by Grade. https://dq.cde.ca.gov/dataquest/dataquest.asp Viewed February 16, 2022

City of Escondido. 2018. City of Escondido Demographics. https://www.escondido.org/demographics Viewed February 17, 2022

Escondido Fire Department (EFD). 2022. Facilities. https://fire.escondido.org/facilities Viewed February 16, 2022

Escondido Union School District (EUSD). 2018. School Facilities Needs Analysis. Prepared by Cooperative Strategies. March 12.

Escondido Union School District (EUSD). 2020. Facilities Master Plan. https://www.eusdplan.org/ Viewed February 16, 2022

Recreation (Section 3.14)

City of Escondido. 2018. City of Escondido Demographics. https://www.escondido.org/demographics Viewed February 17, 2022

Transportation (Section 3.15)

California Air Pollution Control Officers Association (CAPCOA). 2021. Handbook for Analyzing Greenhouse Gas Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. December 2021.

City of Escondido. 2012. Bicycle Master Plan. October.

City of Escondido. 2021. Transportation Impact Analysis Guidelines. April. https://www.escondido.org/Data/Sites/1/media/Engineering/TIACRAIG/EscondidoTransportationImpactAnalysisGuidelines2021.pdf Viewed December 28, 2021

City of Escondido. 2022. City of Escondido VMT Exchange Documentation – Public Review. August 5.

LOS Engineering. 2022. Draft Vehicle Miles Traveled and Local Mobility Analysis. September 1.

San Diego Association of Governments (SANDAG). 2002. Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf Viewed December 28, 2021

Utilities and Service Systems (Section 3.16)

California Department of Resources Recycling and Recovery (CalRecycle). 2022a. Facility/Site Summary Details: Sycamore Landfill (37-AA-0023). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1798?siteID=2871 Viewed April 1, 2022.

California Department of Resources Recycling and Recovery (CalRecycle). 2022b. Facility/Site Summary Details: Otay Landfill (37-AA-0010).

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1790?siteID=2863 Viewed April 1, 2022.

California Department of Resources Recycling and Recovery (CalRecycle). 2020. Jurisdiction Diversion/ Disposal Rate Summary. https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006 Viewed February 8, 2022.

California Energy Commission (CEC). 2018. "2019 Building Energy Efficiency Standards Frequently Asked Questions." March https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf Viewed February 8, 2022.

City of Escondido. 2012. Wastewater Master Plan. June. https://www.escondido.org/Data/Sites/1/media/PDFs/Utilities/WastewaterMasterPlan.pdf

City of Escondido. 2017. City of Escondido Jurisdictional Runoff Management Plan. January 27. https://www.escondido.org/Data/Sites/1/media/pdfs/pubworks/jrmp/JRMP.pdf?v=6 Viewed January 14, 2022.

Department of Water Resources. 2021a. Water Year 2021: An Extreme Year. September https://water.ca.gov/-/media/DWR-Website/Web-Pages/Water-Basics/Drought/Files/Publications-And-Reports/091521-Water-Year-2021-broch_v2.pdf Viewed February 15, 2022

Department of Water Resources. 2021b. DWR Announces Initial State Water Project Allocation, Additional Actions to Prepare for Third Dry Year. December 1. https://water.ca.gov/News/News-Releases/2021/Dec-21/SWP-December-Allocation Viewed February 15, 2022

Dexter Wilson Engineering. 2021. Sewer Study for the North Iris Lane Project in the City of Escondido. September 13.

International Code Council (ICC) 2019. 2019 California Green Building Standards Code (CAL Green). California Code of Regulations, Title 24, Part 11. July https://calgreenenergyservices.com/wp/wp-content/uploads/2019_california_green_code.pdf Viewed February 15, 2022

LDN Consulting. 2022b. Greenhouse Gas Assessment, Iris Lane Multi-Family Development, City of Escondido, July 21.

Metropolitan Water District of Southern California (MWD). 2021a. 2020 Urban Water Management Plan. June. https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf Viewed February 15, 2022

Metropolitan Water District of Southern California (MWD). 2021b. Water Shortage Contingency Plan. June. https://www.mwdh2o.com/media/21648/water-shortage-contingency-plan-june-2021.pdf Viewed February 15, 2022

Metropolitan Water District of Southern California (MWD). 2022. Our Regional Reliability Outlook: Addressing Drought & Climate Resiliency. January. https://www.mwdh2o.com/media/22306/regionaloutlook-feb-2022.pdf Viewed February 15, 2022

Nagourney, Adam. 2015. California Imposes First Mandatory Water Restrictions to Deal with Drought. The New York Times. https://www.nytimes.com/2015/04/02/us/california-imposes-first-ever-water-restrictions-to-deal-with-drought.html Viewed February 8, 2022.

Public Policy Institute of California (PPIC). 2021. Just the Facts. Droughts in California. https://www.ppic.org/publication/droughts-in-california/ Viewed May 4, 2021

Rincon del Diablo Municipal Water District (RDDMWD) 2014. Water Master Plan Update. June. https://rinconwater.org/wp-content/uploads/2018/12/Water-Master-Plan-2014.pdf

Rincon del Diablo Municipal Water District (RDDMWD) 2015. An Ordinance of the Rincon del Diablo Municipal Water District Finding the Necessity For and Adopting a Drought Response Ordinance. https://rinconwater.org/wp-content/uploads/2019/02/Ordinance-15-120.2.pdf Viewed February 15, 2022

Rincon del Diablo Municipal Water District (RDDMWD) 2020a. About Us Our Water. https://rinconwater.org/about-us/our-water/ Viewed February 15, 2022

Rincon del Diablo Municipal Water District (RDDMWD) 2020b. Drought Regulations. https://rinconwater.org/departments/conservation/1132-2/ Viewed February 15, 2022

Rincon del Diablo Municipal Water District (RDDMWD) 2021. 2020 Urban Water Management Plan. May. https://rinconwater.org/wp-content/uploads/2021/07/2020-UWMP-OPTI.pdf Viewed February 15, 2022

Rincon del Diablo Municipal Water District (RDDMWD) 2022. Improvement District Map. https://rinconwater.org/wp-content/uploads/2019/02/ImpDistrictMap1.pdf Viewed February 15, 2022

San Diego County Water Authority (SDCWA). 2021a. 2020 Urban Water Management Plan. May. https://www.sdcwa.org/wp-content/uploads/2021/08/2020-UWMP_Final-Print-Version-July-2021-1.pdf Viewed February 15, 2022

San Diego County Water Authority (SDCWA). 2021b. 2020 Water Shortage Contingency Plan. May 27. https://www.sdcwa.org/wp-content/uploads/2021/08/SDCWA-WSCP-05272021-rev-July-2021-1.pdf Viewed February 15, 2022

San Diego County Water Authority (SDCWA). 2021c. Water Authority Activates Water Shortage Contingency Plan. October 28. https://www.sdcwa.org/water-authority-activates-water-shortage-contingency-plan/ Viewed February 15, 2022

State of California Office of Governor Gavin Newsom. 2021a. Governor Newsom Takes Action To Respond to Drought Conditions. April 21. https://www.gov.ca.gov/2021/04/21/governor-newsom-takes-action-to-respond-to-drought-conditions/ Viewed February 15,2022

State of California Office of Governor Gavin Newsom. 2021b. Governor Newsom Expands Drought Emergency to Klamath River, Sacramento-San Joaquin Delta and Tulare Lake Watershed Counties. May 10. https://www.gov.ca.gov/2021/05/10/governor-newsom-expands-drought-emergency-to-klamath-river-sacramento-san-joaquin-delta-and-tulare-lake-watershed-counties/ Viewed May February 15, 2022

State of California Office of Governor Gavin Newsom. 2021c. Governor Newsom Expands Drought Emergency Statewide, Urges Californians to Redouble Water Conservation Efforts. October 19. https://www.gov.ca.gov/2021/10/19/governor-newsom-expands-drought-emergency-statewide-urges-californians-to-redouble-water-conservation-efforts/ Viewed February 15, 2022.

Thomas and Murtland. 2017. Rincon Water Applauds Decision Lifting Emergency Drought Regulations. Escondido Times – Advocate. April 19. https://www.times-advocate.com/articles/rincon-water-applauds-decision-lifting-emergency-drought-regulations/ Viewed May 4, 2021

Other CEQA Considerations (Section 4.0)

CalFire. 2022. Fire Hazard Severity Zone Viewer. https://egis.fire.ca.gov/FHSZ/ Viewed February 2, 2022.

California Department of Conservation (CDC). 2018. Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland Mapping Tool. Viewed February 3, 2022. https://maps.conservation.ca.gov/DLRP/CIFF/

City of Escondido. 2018. City of Escondido Demographics Webpage. Viewed February 2, 2022. https://escondido.org/demographics

City of Escondido. 2012b. Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report. April 23.

DUDEK. 2022. Fire Protection Plan – Letter Report for the 2085 N. Iris Lane Project. April 18.

Alternatives (Section 5.0)

County of San Diego. 2022. Draft County of San Diego Transportation Study Guidelines. August. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/SB743TransportationGuide/COSD%20TSG%20DRAFT_Public%20Review%20wAppendices.pdf

7.0 Mitigation Measures, Project Design Features and Compliance Measures

7.1 Aesthetics

7.1.1 Mitigation Measures

There are no significant aesthetic impacts, therefore no mitigation measures are required.

7.1.2 Project Design Features

PD-AE-1 Implementation the project landscape plan.

7.1.3 Compliance Measures

CM-AE-1 In accordance with Article 35 of the Zoning Ordinance, all exterior lighting fixtures, with the exception of street lamps, would be aimed or shielded so that unnecessary nighttime lighting and glare would be reduced for the benefit of City residents and astronomical research at Palomar Mountain Observatory. In accordance with Zoning Ordinance Section 33-713, lighting installed in the public right-of-way would also comply with the City's Engineering Design Standards and Standard Drawings

7.2 Air Quality

7.2.1 Mitigation Measures

There are no significant air quality impacts, therefore no mitigation measures are required.

7.2.2 Project Design Features

PD-AQ-1 The project will install low flow water fixtures in all units.

PD-AQ -2 All indoor and outdoor lights in the project will be designed to use LED technology.

PD- AQ-3 The project will provide separate waste containers to allow for simpler material separations or the project will pay for a waste collection service that recycles the materials in accordance with AB 341 to achieve a 75% waste diversion. All green waste will be diverted from landfills and recycled as mulch.

PD- AQ -4 The project will not install hearth options.

PD- AQ -5 The project will utilize ENERGY STAR qualified appliances.

PD- AQ -6 The project will utilize Tier 4 construction equipment with attached diesel particulate filters or the equivalent.

PD- AQ -7 The project will plant a minimum of 102 trees to sequester Carbon Dioxide (CO_2).

PD- AQ -8 The project will install two kilowatts (kW) of solar per unit, or roughly 204 kW of solar in total at the project site.

PD- AQ -9 The project will install electric heat pump water heaters in all units.

PD-AQ-10 The project will utilize Tier IV or better construction equipment, which include diesel particulate filters, as required by current regulations.

7.2.3 Compliance Measures

CM-AQ-1 In accordance with San Diego Air Pollution Control District (SDAPCD) Rule 55, Fugitive Dust Control, the Project will include dust control measures during grading.

CM-AQ-2 The project shall comply with State of California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700 and SDAPCD Rule 51 regarding emissions and odors.

CM-AQ-3 The project shall comply with applicable California Air Resources Board (CARB) regulations and standards. CARB is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

CM-AQ-4 The project shall comply with SDAPCD regulations, including federal and state ambient standards they implement in the San Diego Air Basin.

7.3 Biological Resources

7.3.1 Mitigation Measures

MM-BIO-1 Trimming, grubbing, and clearing of vegetation shall be avoided during the avian breeding season, which generally runs from February 15 to August 31 (as early as January 1 for some raptors) to the extent feasible. If trimming, grubbing, or clearing of vegetation is proposed to occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to vegetation clearing to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, grubbing, and clearing of vegetation shall be allowed to proceed. If active bird nests are confirmed to be present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive.

MM-BIO-2 Prior to impacts to any sensitive habitats (disturbed wetland and non-native grassland), the applicant shall purchase off-site mitigation credits at a mitigation bank approved by the City. Mitigation ratios shall be consistent with regional standards (i.e., the Escondido Draft Subarea Plan): non-native grassland minimum 0.5:1 and disturbed wetland minimum 1:1. The disturbed wetland mitigation shall consist of establishment/re-establishment mitigation to achieve regional no-net-loss standards for potential wetlands. Proof of mitigation purchase shall be provided to the City prior to issuance of the grading permit.

MM-BIO-3 Prior to any project impacts to potentially jurisdictional resources, demonstration that regulatory permits from USACE, RWQCB, and CDFW have been issued or that no such permits are required shall be provided to the City. Permanent impacts to 0.05 acre of USACE/RWQCB jurisdictional non-wetland waters of the United States/State, 0.10 acre of CDFW jurisdictional habitat, and 0.02 acre of CDFW jurisdictional streambed shall be mitigated at a minimum 1:1 ratio through one or a combination of the following off-site options, unless otherwise required by the USACE, RWQCB, and/or CDFW during the regulatory permitting process:

- Purchase of establishment/re-establishment, rehabilitation, enhancement, and/or preservation credits from an off-site mitigation bank with a service area that overlaps the project and that is approved by the USACE, RWQCB, and CDFW, such as the San Luis Rey Mitigation Bank, and Brook Forest Conservation/Mitigation Bank; and/or
- Acquisition or use of other off-site mitigation lands in the region to include establishment/re-establishment, rehabilitation, enhancement, and/or preservation of USACE, RWQCB, and CDFW jurisdictional resources.

Mitigation for RWQCB-jurisdictional waters shall include a minimum 1:1 establishment/ reestablishment to ensure no-net-loss. Final mitigation requirements shall be determined during the permitting process in coordination with the USACE, RWQCB, and CDFW, as appropriate.

MM-BIO-4 The project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City's Director of Community Development. This condition can be satisfied on-site if the project's landscape plans include the appropriate number of oak trees and other tree species.

MM-BIO-5 The project applicant shall prepare an infectious tree disease management plan for the project. This plan should include a description of how the infectious tree disease management plan will be implemented. All trees that would be removed by the project should be inspected for contagious tree diseases including, but not limited to, thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the project site without first being treated using best available management practices relevant for each tree disease observed.

7.3.2 Project Design Features

PD-BIO-1 The project shall implement a Root Protection Zone with fencing along the southern project boundary as described *2085 N. Iris Lane – Off-Site Coast Live Oaks Along the Southern Property Boundary* letter prepared by Lightfoot Planning Group (March 15, 2022) (Appendix E2 of the EIR).

7.4 Cultural Resources/Tribal Cultural Resources

7.4.1 Mitigation Measures

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

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

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

with a TCA Tribe. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

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

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

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

MM-CR-6 If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c), the archaeologist shall immediately notify the City of said discovery. The qualified archaeologist, in consultation with the City, the consulting TCA Tribe(s), and the Native American monitor, shall determine the significance of the discovered resource. A

recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and be submitted to the City for review and approval. If the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) though (c), appropriate treatment measures will be implemented. Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

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

M-CR-8 As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code §

5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.

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

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

7.5 Energy

7.5.1 Mitigation Measures

There are no significant energy impacts, therefore no mitigation measures are required.

7.5.2 Project Design Features

PD-E-1 The project will install low flow water fixtures in all units. (This is also identified as PD-GHG-1)

PD-E-2 All indoor and outdoor lights in the project will be designed to use LED technology. (This is also identified as PD-GHG-2).

PD-E-3 The project will utilize ENERGY STAR qualified appliances. (This is also identified as PD-GHG-5).

PD-E-4 The project will install two kilowatts (kW) of solar per unit, or roughly 204 kW of solar in total at the project site. (This is also identified as PD-GHG-8).

7.6 Geology and Soils

7.6.1 Mitigation Measures

MM-GEO-1 Prior to project grading the project applicant shall retain a qualified paleontologist to review the proposed project area to determine the potential for paleontological resources to be encountered. If there is a potential for paleontological resources to occur, the paleontologist shall identify the area(s) where these resources are expected to be present, and a qualified paleontological monitor shall be retained to monitor the initial cut in any areas that have the potential to contain paleontological resources.

7.6.2 Project Design Features

PD-GEO-1 The project shall implement all recommendations from the geotechnical investigation report (GEOCON 2021). These recommendations include general provisions related to the site as well as specific recommendations related to soil and excavation characteristics, corrosion, grading, slope stability, seismic design criteria, foundation and concrete slab-on-grade, retaining walls and lateral loads, slope maintenance, site drainage and maintenance, and grading and foundation plan review. The detailed recommendations are included in Chapter 6 of the geotechnical report, which is included as Appendix G1 of this document.

7.7 Greenhouse Gas

7.7.1 Mitigation Measures

There are no significant greenhouse gas impacts, therefore no mitigation measures are required.

7.7.2 Project Design Features

PD-GHG-1 The project will install low flow water fixtures in all units.

PD-GHG-2 All indoor and outdoor lights in the project will be designed to use LED technology.

PD-GHG-3 The project will provide separate waste containers to allow for simpler material separations or the project will pay for a waste collection service that recycles the materials in accordance with AB 341 to achieve a 75% waste diversion. All green waste will be diverted from landfills and recycled as mulch.

PD-GHG-4 The project will not install hearth options.

PD-GHG-5 The project will utilize ENERGY STAR qualified appliances.

PD-GHG-6 The project will utilize Tier 4 construction equipment with attached diesel particulate filters or the equivalent.

PD-GHG-7 The project will plant a minimum of 102 trees to sequester Carbon Dioxide (CO_2).

PD-GHG-8 The project will install two kilowatts (kW) of solar per unit, or roughly 204 kW of solar in total at the project site.

PD-GHG-9 The project will install electric heat pump water heaters in all units.

7.7.3 Compliance Measures

CM-GHG-1 Compliance with the City's Water Efficient Landscape Ordinance (WELO).

7.8 Hazards and Hazardous Materials

7.8.1 Mitigation Measures

MM-HAZ-1a Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that an asbestos survey has been conducted on any buildings that are to be demolished or removed from the project site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations to properly abate and dispose of all on-site asbestos-containing materials before general demolition activities commence.

MM-HAZ-1b Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, the applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.

MM-HAZ-2 Prior to construction activities on the project site, the Applicant shall submit verification that the undocumented fill material placed in front of 2039 North Iris Lane has been removed or evaluated for the potential for contaminants. If contaminated, the soil must be removed and disposed of according to local and state regulations. If contaminated soil is identified, the applicant shall follow all procedural and regulatory requirements for its proper removal and disposal before general construction activities commence.

7.8.2 Project Design Features

PD-HAZ-1 Information about "Ready Set Go" program will be provided in Owner's manuals. This program is designed to help residents prepare in the event of an approaching wildfire.

7.8.3 Compliance Measures

CM-HAZ-1 All new structures on the project site will meet applicable Fire and Building Codes pursuant to requirements for ignition resistance (California Building Code, Chapter 7A). Hardening each building against a wildfire would require building features as follows:

- New Class-A fire-rated roof and associated assembly. With the proposed Class-A fire-rated roof, there will be attic or void spaces above living spaces requiring ventilation to the outside environment. The attic spaces will require either ember-resistant roof vents or a minimum 1/16-inch mesh and shall not exceed 1/8-inch mesh for side ventilation (recommend BrandGuard, O'Hagin, or similar vents).
- Multi-pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes (CBC 708A) when tested according to NFPA 257 (such as SaftiFirst, SuperLite 20-minute rated glass product), or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2
- Ember resistant vents with a minimum of meeting the 1/16 inch to 1/8 inch mesh size.
- Exterior walls meeting CFC 707A.3
- Accessory structures, appendages, decks meeting ignition resistant requirements of CBC 709A and 710A

CM-HAZ-2 An approved, automatic fire sprinkler system will be installed in all new structures for the Project in accordance with minimum NFPA 13 D or R3 standards, 2019 CFC and CBC, and RFPD Fire Code or the current, adopted Code editions at the time building permits are issued.

7.9 Hydrology and Water Quality

7.9.1 Mitigation Measures

There are no significant hydrology and water quality impacts, therefore no mitigation measures are required.

7.9.2 Project Design Features

PD-HWQ-1 Installation of three on-site water quality basins for stormwater retention and biofiltration.

7.10 Noise

7.10.1 Mitigation Measures

MM-N-1 If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines. A noise mitigation plan based upon the location of the construction equipment, topography and construction schedule shall be prepared by an acoustical consultant. The noise mitigation plan shall identify measures to reduce sound levels to below 75 dBA. Such measures could include a temporary noise barrier along any property line

where the impacts could occur. The proposed noise barrier shall be of solid non-gapping material to adequately reduce construction noise levels below the noise threshold of 75 dBA at the property lines. The noise mitigation plan shall determine the final height and location of a temporary barrier if one is necessary The mitigation plan may also identify location and timing restrictions on drilling equipment usage. The mitigation plan shall be submitted to the City for review and approval prior to initiation of rock drill staging activities within 160 feet of any occupied noise sensitive land use.

7.10.2 Project Design Features

PD-N-1 The HVAC units are located a minimum of 30 feet from the property lines and are shielded by the proposed homes and perimeter fencing as shown in Figure 3.11-2. The solid fencing will be vinyl, ¾-inch or thicker consisting of solid panels on minimum 4x4-inch posts with no cracks or gaps through or below and all seams or cracks will be filled or caulked.

7.10.3 Compliance Measures

CM-N-1 To ensure compliance with the CCR Title 24 interior noise threshold of 45 dBA CNEL, a final noise assessment shall be performed prior to the issuance of building permits. This final report shall identify the interior noise requirements based on architectural and building plans to meet the City's established interior noise limit. The identified interior noise requirements, which may include conventional building construction methods and providing a closed window condition requiring a means of mechanical ventilation (e.g., air condition) for each building and upgraded windows for all sensitive rooms (e.g., bedrooms and living spaces), shall also be in place prior to occupancy of the residences adjacent to North Iris Lane.

CM-N-2 The Project shall comply with local construction and grading noise regulations. Construction would only occur between the hours of 7:00 a.m. and 6:00 p.m. on Monday through Friday and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays. Grading would be similarly limited, except on Saturdays when it would be limited to between 10:00 a.m. and 5:00 p.m.

7.11 Public Services

7.11.1 Mitigation Measures

There are no significant public services impacts, therefore no mitigation measures are required.

7.11.2 Compliance Measures

CM-PS-1 Consistent with Article 18B of Chapter 6 of the Escondido Municipal Code, the Applicant shall provide payment of applicable public facilities fees.

CM-PS-2 The Applicant shall pay school fees in accordance with Government Code 65995 and Education Code 17620.

CM-PS-3 Consistent with to Article 18C, Chapter 6, of the City's Municipal Code, the Applicant shall pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development.

CM-PS-4 All new projects in the City are required to annex into CFD 2020-1 (Citywide Services) or establish another lawful funding mechanism to offset costs associated with the provision of public services.

7.12 Recreation

7.12.1 Mitigation Measures

There are no significant recreation impacts, therefore no mitigation measures are required.

7.12.2 Compliance Measures

CM-REC-1 Pursuant to Article 18C, Chapter 6, of the City's Municipal Code, the Applicant shall pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development. (This is also identified as CM-PS-3).

7.13 Transportation

7.13.1 Mitigation Measures

MM-TR-1a The project shall implement CAPCOA reduction measure T-1 (Increase Residential Density).

MM-TR-1b The project applicant shall pay the City of Escondido $67,500 for pedestrian improvements at the following five intersections to reduce VMT impacts:

- Intersection of Centre City Pkwy at Iris Lane (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of El Norte at South Iris Lane (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of Broadway at Vista Ave (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of El Norte Parkway at Mountain View (Install pedestrian countdown timers on each corner (4 countdown timers)).
- Intersection of Country Club Lane at Broadway (Install high visibility crosswalk (3 crosswalks)).

7.13.2 Project Design Features

PD-TR-1 The project shall widen North Iris Lane along the project frontage to create a 62-foot right-of-way.

PD-TR-2 The project shall install sidewalks along the project frontage on North Iris Lane (approximately 850 feet) and along Robin Hill Lane (approximately 440 feet).

PD-TR-3 The project shall install Class III bike markings along the project's frontage on North Iris Lane.

PD-TR-4 The Homeowners Association shall provide information about SANDAG's iCommute program to encourage carpooling.

PD-TR-5 The Homeowners Association shall provide information about maps, routes, and schedules for public transit.

7.13.3 Compliance Measures

CM-TR-1 The project applicant will pay a fair share for the widening of North Iris Lane for approximately 280 linear feet northeast of City Centre Parkway. The fair share is calculated at 6.5% and resulting in a fee requirement of $10,075.

CM-TR-2 The project applicant will pay a fair share towards a City improvement at the intersection of City Centre Parkway and North Iris Lane. The improvements include modifying the intersection operations to a split phase on North Iris Lane and restriping the westbound approach on North Iris Lane from a left and through right configuration to a left and left-through configuration. The fair share is calculated at 3.1% and resulting in a fee requirement of $6,975.

7.14 Utilities and Service Systems

7.14.1 Mitigation Measures

There are no significant utilities and service systems impacts, therefore no mitigation measures are required.

7.14.2 Project Design Features

PD-UTIL-1 Compliance with the City's Water Efficient Landscape Ordinance.

PD-UTIL-2 The project will install low flow water fixtures in all units.

7.14.3 Compliance Measures

CM-UTIL-1 The project applicant will be required to pay Rincon del Diablo Municipal Water District (RDDMWD) Capital Facility Fees for potable water meter installation, as described in RDDMWD Ordinance No. 21-98.21.

8.0 List of Preparers

City of Escondido (Lead Agency)
Jay Paul, Senior Planner
Julie Procopio, City Engineer
Craig Williams, Associate Engineer – Traffic

Environmental Impact Report
Sophia Mitchell & Associates, LLC
Sophia Habl Mitchell, LEED AP, Project Manager
Melyssa Sheeran, Senior Environmental Consultant

Air Quality, Greenhouse Gas, and Noise Reports
LDN Consulting
Jeremy Louden, Principal

Biological Resources Report and Focused Species Surveys
Helix Environmental Planning
Jason Kurnow, Senior Scientist
Camille Lill, GIS Group Manager
Mandy Matthews, Biologist
Amy Mattson, Biologist

Cultural Resources Report
Laguna Mountain Environmental
Andrew R. Pigniolo, MA, RPA
Carol Serr, BA

Geotechnical Investigation
Geocon Incorproated
Donald Githens, Staff Engineer
Trevor E. Myers, RCE
David B. Evans, CEG

Phase 1 Environmental Site Assessment
Geocon Incorporated
Cole E. Mikesell, Staff Geologist
Troy K. Reist, CEG, Senior Geologist

Seismic Refraction Study
Atlas Technical Consultants
Thomas M. Bouleanu, Senior Staff Geophysicist
Patrick F. Lehrmann, PG, PGP

Stormwater Quality Management Plan/Drainage Report
SB&O Inc.
Allen L. Butcher, PE

Transportation Analysis
LOS Engineering, Inc.
Justin Rasas, RCE