



## Environmental Checklist Form (Initial Study)

1. Project title and case file number PHG20-0035 (Solaris Business Park Project) Specific Plan
2. Lead agency name and address: City of Escondido, 201 N. Broadway, Escondido, CA 92025
3. Lead agency contact person name, title, phone number and email: Jay Paul, Senior Planner 760.839.4537
4. Project location: South and east sides of Country Club Lane (APNs 228-400-14, -15, -16, -22, -23 and 232-030-15)
5. Project applicant's name, address, phone number and email: J. Whalen Associates, 1660 Hotel Circle North, Suite 725 (619).683.5544
6. General Plan designation: Specific Plan
7. Zoning: N/A
8. Description of project: (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.) Environmental Impact Report (EIR) for a proposed Specific Plan for development of an industrial business parking comprising up to 500,000 SF of building space.
9. Surrounding land uses and setting (briefly describe the project's surroundings):  
City and County land developed with residential and industrial uses (see additional information provided)
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement).  
City of Escondido, LAFCO, RWQCB, Army Corp, California Department of Fish and Wildlife

## Environmental Factors Potentially Affected:

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

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

**DETERMINATION:** (To be completed by the Lead Agency) On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
- ☐ I find that, although the proposed project might have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made, or agreed to, by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.
- ☒ I find that the proposed project might have a significant effect on the environment and/or deficiencies exist relative to the City's General Plan Quality of Life Standards, and the extent of the deficiency exceeds the levels identified in the City's Environmental Quality Regulations pursuant to Zoning Code Article 47, Section 33-924 (b), and an ENVIRONMENTAL IMPACT REPORT shall be required.
- ☐ I find that the proposed project might have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect: a.) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and b.) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT shall be required, but it shall analyze only the effects that remain to be addressed.
- ☐ I find that, although the proposed project might have a significant effect on the environment, no further documentation is necessary because all potentially significant effects: (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.

*J Paul*

Signature

August 2022

Date

Jay Paul, Senior Planner  
Printed Name and Title

## EVALUATION OF ENVIRONMENTAL IMPACTS:

1. This section evaluates the potential environmental effects of the proposed project, generally using the environmental checklist from the State CEQA Guidelines as amended and the City of Escondido Environmental Quality Regulations (Zoning Code Article 47). A brief explanation in the Environmental Checklist Supplemental Comments is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. All answers must take into account the whole action involved, including off-site, on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts and mitigation measures. Once the lead agency has determined that a particular physical impact might occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. The definitions of the response column headings include the following:
  - A. "Potentially Significant Impact" applies if there is substantial evidence that an effect might be significant. If there are one or more "Potentially Significant Impact" entries once the determination is made, an EIR shall be required.
  - B. "Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 2 below, "Earlier Analyses," may be cross-referenced). Measures incorporated as part of the Project Description that reduce impacts to a "Less than Significant" level shall be considered mitigation.
  - C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.
  - D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. Earlier Analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - A. Earlier Analysis Used. Identify and state where it is available for review.
  - B. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of an adequately analyzed earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - C. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
3. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

4. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
5. The explanation of each issue should identify the significance of criteria or threshold, if any, used to evaluate each question, as well as the mitigation measure identified, if any, to reduce the impact to less than significant.

### Description of Project: Project Overview

The proposed Solaris Business Park Specific Plan would provide a comprehensive set of design guidelines, development regulations, and implementing processes for the development of the Project. The Project is a proposed industrial business park consisting of up to 500,000 square feet of building space with a range of allowable uses, including light industrial, indoor manufacturing, storage, office, medical office, and new automobile sales (indoor storage only).

The project site is a 45.4-acre, mostly undeveloped property located on the south and east sides of County Club Lane, approximately 1 mile west of the I-15/SR-78 freeway interchange. The Project site is located in unincorporated San Diego County, adjacent to the City of Escondido municipal boundary, and within the City's Sphere of Influence and Planning Area (Figure 1, Vicinity Map). The Project site is comprised of Assessor Parcel Numbers (APN) 228-400-14, -15, -16, -22, -23 and 232-030-15.

The project site is adjacent to the Escondido City limits on its western and northeastern edges and annexation/reorganization to the City of Escondido is proposed. Accordingly, the project includes several requested entitlements and approvals, including a Specific Plan, Prezone/Rezone, Tentative Subdivision Map, Grading Exemptions, and EIR.

### Project Setting

The project site is primarily undeveloped and surrounded by a variety of development on all sides. To the southeast of the site is the Palomar Medical Center; immediately to the south, east and north is single family residential development; to the west of the site is commercial, light industrial, and business park uses; and to the southwest is equestrian and lower density residential development.

The Project site is comprised of predominantly granitic soils and rock outcroppings and is characterized by a minor ridgeline running generally north-south in the approximate center of the site. Elevations range between approximately 700 feet above mean sea level to approximately 890 feet above mean sea level. A San Diego Gas & Electric 69-kV transmission line crosses the lower third of the project site diagonally from the southeast to the northwest. The project site is within the City of Escondido's Sphere of Influence and is identified within a Specific Plan Area, SPA #8 (Escondido Research Technology Center – Harmony Grove) by the General Plan Land Use Map.

### Access and Circulation

Regional access to the site is via SR-78 and I-15 with the SR-78/Nordahl Road and I-15/West Valley Parkway interchanges serving as the most proximal freeway access points. Direct access to the site is provided via Country Club Drive which intersects Auto Park Way to the northeast, and Harmony Grove Village Parkway to the south. Project access is proposed via a new, four- way intersection at Progress Place and Country Club Drive. Country Club Way serves as an emergency access for the project onto Country Club Drive. Refer to Figure 2, Project site.

### Project Site History

Historically, the project site has undergone alteration. Foundations for four estate-style homesites were created in association with a rural subdivision of the properties, and two vacant homes reside along Country Club Way in the northwestern portion of the site.

The project site was previously cleared under a County of San Diego issued Habitat Loss Permit (County of San Diego HLP-15-002). Mitigation was provided in the form of purchasing mitigation bank credits (Open Space Easement, DOC# 2017-0531742).

Solaris Business Park Specific Plan.

The Solaris Business Park Specific Plan will be prepared to guide the development of the Solaris Business Park Project, consistent with the vision, goals, policies, and objectives of the City of Escondido General Plan. The purpose and intent of the Solaris Business Park Specific Plan are to provide project objectives, design guidelines, development regulations, and implementing processes for the development of a business park project with a range of allowable uses comprising up to 500,000 square feet of building space. The Site Plan is depicted in Figure 3, Conceptual Site Plan. The project objectives, design guidelines, development regulations, and implementing processes presented therein will reflect the intent to plan the site for the industrial business park uses that generate high quality jobs and business activities that provide fiscal benefits to the City, are compatible with the surrounding community, and are consistent with the City's General Plan.

Project Entitlements / Approvals:

The proposed project consists of the following entitlements and agency approvals, which would be processed concurrently unless noted:

1. Annexation/Reorganization
2. Prezone/Rezone
3. Specific Plan
4. Tentative Tract Map
5. Grading Exemptions
6. Certification of Final Environmental Impact Report

Environmental Impact Report: An EIR has been identified as the environmental document to be prepared for the project in accordance with section 15063 of the CEQA Guidelines. The City of Escondido determined that an EIR will be prepared to address potential direct and cumulative impacts associated with aesthetics, agriculture resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use and planning, mineral resources, noise, population and housing, public services, transportation/traffic, tribal cultural resources, utilities and service systems, and wildfire.

Project Website: Please see the City's project website for more information about the Project and Initial Study:

<https://www.escondido.org/solaris-business-park>

# I Aesthetics

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

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

**Potentially Significant Impact.** The proposed project would introduce development to a largely undeveloped site which contains trees, elevated areas, and rock outcroppings. Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** No officially designated state scenic highways exist within the City limits. The nearest officially designated Scenic Highway is a section of State Route-52, located approximately 19 miles south of the proposed project site (Caltrans 2018). Therefore, the proposed project is not anticipated to result in impacts to scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway and impact would be less than significant. However, the project site's existing condition includes largely undeveloped areas and contains trees and rock outcroppings; therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** The project site is within the Sphere of Influence of the City of Escondido. The proposed project site is within a Specific Plan Area that is urbanizing. Section 21071 of the California Public Resources Code defines “urbanized areas” as area which are in an incorporated City with a population of at least 100,000 persons, or in an unincorporated area and meet certain locational attributes, population and population density characteristics in the latest General Plan.

The project site is surrounded by development on the east, north, and west, and is located immediately adjacent to the City of Escondido on the north and east. Thus, the project site may qualify as Urbanized. The project proposes a Specific Plan, which is consistent with the underlying General Plan Land Use designation in the City (specifically, the site is identified as SPA #8, see General Plan Figure II-15). Because Specific Plans allow for projects to create site-specific development standards, and because no such standards have already been developed for the project site, the proposed project would not conflict with the Specific Plan regulations.

The areas south and southwest of the project site are still generally rural and characterized by large lot, single family homes and equestrian uses. Therefore, because the project proposes to introduce development to a largely undeveloped site which contains elevated areas and rocky outcroppings, and because the project site may or may not be in an “urbanized area,” the project may have the potential to degrade the existing visual character or quality of public views of the site and its surrounding area. Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact with Mitigation Incorporated.** The proposed project would include development of business park uses on a largely undeveloped site. The development would include windows and other reflective building materials, as well as daytime and nighttime lighting elements. Impacts are expected to be considered potentially significant absent mitigation. Mitigation for impacts due to the creation of new sources of light and glare include requirements for shielding lighting, providing non-reflective surfaces/finishes, and other measures which are expected to reduce impacts to less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.



## II Agriculture and Forestry Resources

	Potentially Significant Impact	Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; therefore, impacts due to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use are expected to be less than significant. However, the project site does contain Farmland of Local Importance (DOC

2022) and is zoned by the County as A70, which is a limited agricultural zone. The County of San Diego considers impacts to Farmland of Local Importance as potentially significant and requires additional analysis and potential mitigation includes options to participate in the County's Purchase of Agricultural Conservation Easements (PACE) Program, which promotes the long-term preservation of agriculture in the County of San Diego. Further, the City's General Plan (Figure VII-6) identifies the northern portion of the project site as an "Agricultural Area." Therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** The Williamson Act, also known as the California Land Conversion Act of 1969 (California Government Code, Section 51200 et seq.), preserves agricultural and open space lands from the conversion to urban land uses by establishing a contract between local governments and private landowners to voluntarily restrict their land holdings to agricultural or open space use. The project site is not subject to a Williamson Act Contract.

While the project proposes to annex in the City, and the City has designated the project site as Specific Plan Area, the project site is currently located within the San Dieguito Community Plan area of the San Diego County General Plan and is zoned Rural Residential (RR) and Limited Agriculture (A70) in the County. Further, the City's General Plan (Figure VII-6) identifies the northern portion of the project site as an "Agricultural Area." Therefore, while the project would be consistent with the City's pre-zoning, and would not conflict with any City-designated zoning for agricultural uses, because the project's current County zoning includes A70, impacts due to conflicts with existing zoning for agricultural use are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**No Impact.** The project site is not zoned as forest land. As such, the proposed project would not conflict with existing zoning or cause rezoning of any forest or timberland since none of those land types are located within the vicinity of the project site. Therefore, no impact would occur due to cause rezoning of forest land, timberland, or timberland zoned Timberland Production, and this topic will not be discussed and analyzed in the EIR.

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

**No Impact.** As discussed in (c) above, the project site does not contain forest land. As such, the proposed project would not cause the loss or conversion of forest land to non-forest use. Therefore, no impact would occur, and this topic will not be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** As discussed in (a) and (b) above, the project site contains areas identified as Farmland of Local Importance and portions of the project site are zoned for Limited Agriculture by the San Diego County General Plan. As such, there is a potential for the project to result in the conversion of farmland to non-agricultural uses. However, it is noted that the surrounding area is largely developed,

including the portions of the City of Escondido and areas within the Unincorporated County which have been proposed and approved for development; therefore, no additional impacts due to conversion of farmland to non-agricultural use are expected. Nonetheless, due to the Agricultural zoning on surrounding property in the County to the west/southwest of the project site, impacts due to changes in the existing environment which could result in conversion of farmland to non-agricultural uses are considered potentially significant. This topic will be discussed and analyzed in the EIR.

### III Air Quality

	Potentially Significant Impact	Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** A significant impact may occur if the proposed project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The project site is within the San Diego County Air Basin, and the applicable plan is the Air Quality Management Plan prepared by the San Diego County Air Pollution Control District (SDAPCD). Construction and operation of the project could result in an increase in emissions by increasing the land use intensity at the project Site compared to the adopted zoning (RR and A70), having the potential to conflict with the Air Quality Management Plan. Impacts due to project conflicts with the applicable air quality plan are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Construction emissions associated with development of the proposed project would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NOx),

carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), and sulfur oxides (SO<sub>x</sub>) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).

Criteria pollutants under nonattainment in the San Diego County Air Basin are ozone (state and federal) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) (state) (SDAPCD 2020). The proposed project would generate VOC and NO<sub>x</sub> emissions (which are precursors to ozone) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. Further analysis is required to determine the proposed project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Impacts due to the project's potential to cause a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard are considered potentially significant. Therefore, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** There are sensitive receptors (residences) located in the vicinity of the project site. The proposed project may generate air contaminant emissions during construction of the project. Additionally, the operational emissions associated with the project could expose sensitive receptors to pollutant concentrations as well. Further analysis is required regarding the air pollutant emissions that would result from the proposed project, and whether a substantial impact to sensitive receptors would result. Impacts due to exposure of sensitive receptors to substantial pollutant concentrations are considered potentially significant. Mitigation measures may include the use of diesel particulate filters (DPF) or Tier 4 construction equipment and other measures to reduce emissions of air contaminants. This topic will be discussed and analyzed in the EIR.

- d) Would the project create objectionable odors affecting a substantial number of people?

**Less Than Significant Impact.** Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the proposed project. Odors produced during construction would be attributable to emissions from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction are expected to be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project includes a business park with allowable uses including light industrial, indoor manufacturing, storage, commercial office, and medical office. None of these uses are associated with odor complaints and operation of such uses are not expected to produce odors at magnitude that would affect substantial numbers of people. Further, the proposed project would be required to comply with SDAPCD Rule 51 which stipulates that no person shall discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. Therefore, impacts resulting from project operations are anticipated to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

## IV Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact with Mitigation Incorporated.** The City's General Plan identifies grassland and coastal sage scrub habitat on the proposed project site. A biological field survey was conducted as part of a 2015 Biological Letter Report (Report) by REC Consultants, Inc. during the preparation of an environmental analysis for another potential project at the site involving equestrian and grape growing

uses. According to the Report, the proposed project site supports 20.1 acres of Diegan coastal sage scrub, 14.6 acres of non-native grassland, 7.6 acres of disturbed habitat and 0.5 acres of developed land. No sensitive plant species were observed. Five sensitive wildlife species were observed on site, including coastal California gnatcatcher, coastal whiptail, American kestrel, red-tailed hawk, and turkey vulture. One California gnatcatcher was identified on site during a 2006 gnatcatcher survey. A single gnatcatcher was observed again in February 2013 and a pair was observed in August 2013 (REC Consultants 2015). As such, the proposed project would impact habitat for sensitive species, including the federally threatened California gnatcatcher. However, as mitigation for impacts to Diegan coastal sage scrub and non-native grassland habitat associated with the previous project approved by the County of San Diego on the project site, 47.5 acres of coastal sage scrub and non-native grassland were preserved off-site through the issuance of a Habitat Loss Permit by County of San Diego (County of San Diego HLP-15-002). Mitigation was provided in the form of purchasing mitigation bank credits (Open Space Easement, DOC# 2017-0531742). As such, proposed project impacts associated with the conversion of habitat for sensitive species, including the coastal California gnatcatcher, have already been mitigated and would not require additional mitigation.

As a project design feature (PDF) for the protection of nesting birds, including all species protected under the Migratory Bird Treaty Act (MBTA), as well as the California gnatcatcher, all clearing and grading of the site will occur during the non-breeding season (between September 1 and February 15). With adherence to the PDF, and because impacts to sensitive habitats have already been mitigated through off-site preservation, impacts to sensitive species are expected to be reduced to less than significant.

PDF-1: All clearing and grading activities shall occur during the non-nesting season from September 1 to February 15.

Nonetheless, because the proposed project would change the use from a mostly agrarian/undeveloped use to a business park, there may be other direct or indirect effects on 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; therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** The proposed project site does not contain riparian habitat. However, as discussed in (a) above, it does contain Diegan coastal sage scrub and non-native grassland, which are considered sensitive natural communities by the City and the County of San Diego. However, as discussed in (a), impacts to these habitats have already been mitigated through the purchase of mitigation bank credits for off-site preservation and the project would not require additional mitigation. However, because the proposed project would change the use from a mostly agrarian/undeveloped use to a business park, there may be other direct or indirect effects to sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; therefore, this topic will be discussed and analyzed in the EIR.



- c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

**No Impact.** There are no wetlands present on the project site (REC Consultants 2015). As such, there will be no impact to federally protected wetlands. Nonetheless, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** The project site is not part of or connected to any wildlife corridors or linkages (REC Consultants 2015). Additionally, the project site is mostly surrounded by urban development on the northwest, north, east, and south sides. As such, development of the proposed project would not interfere substantially with the movement of any wildlife species or corridors. Impacts are expected to be less than significant. However, because the proposed project would change the use from a mostly agrarian/undeveloped use to a business park, there may be other direct or indirect impacts to 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; therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** As part of the proposed project, the project site will be annexed to the City. The City's Vegetation Protection and Replacement Standards (Standards) require a minimum 1:1 replacement ratio for mature trees and a 2:1 replacement ratio for protected trees (oak trees with 10-inch or greater diameter breast height [DBH]) that cannot be preserved on site. Any trees removed as part of the proposed project would be required to be replaced in compliance with these Standards. The Standards also require that sensitive biological habitat and species removal be mitigated either on or off-site by planting the same species at a minimum 1:1 replacement ratio. This requirement has been fulfilled through the off-site preservation of 47.5 acres of coastal sage scrub and non-native grassland; therefore, impacts are expected to be less than significant. However, because the proposed project would include an annexation into the City and change the use from a mostly agrarian/undeveloped use to a business park, there may be conflicts with local policies or ordinances protecting biological resources; therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** Escondido is one of seven cities in northwestern San Diego comprising a Natural Community Conservation Plan (NCCP) subregion involved in the sub-regional Multiple Habitat Conservation Program (MHCP) (North County Plan). However, the North County Plan is currently under development and has not been adopted. As such, the project site is not located in an area with an adopted HCP or NCCP and is not considered to have a significant impact related to such a plan (consistent with the California 4th District court decision in Chaparral Greens vs. City of Chula Vista [50 Cal.App.4th 1134]). Therefore, the project would not conflict with a habitat conservation plan and impacts are expected to be

less than significant. However, because the proposed project would include an annexation into the City and change the use from a mostly agrarian/undeveloped use to a business park, there may be conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; therefore, this topic will be discussed and analyzed in the EIR.

## V Cultural Resources

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

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

**Less Than Significant Impact.** The term “historical resources” include the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California



Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) 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
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.

The project site is currently vacant, with the exception of former building foundations. It is not expected that these foundations would meet the threshold for significance under Section 15064.5. Therefore, impacts to historical resources are expected to be less than significant.

Nonetheless, preparation of the EIR will involve conducting a cultural resources analysis, including any potential eligible historic resources. The EIR will summarize the findings of these investigations and will describe whether the project could have an adverse effect in the category of historical resources. As such, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact With Mitigation Incorporated.** Public Resources Code Section 21083.2(g) generally defines a unique archaeological resource as an artifact, object, or site that meets a number of criteria, including an ability to provide information needed to answer important scientific questions that have public interest; having a special and particular quality, such as being the oldest of its type; or, being directly associated with a scientifically recognized important prehistoric or historic event or person. Project construction would involve excavation and as such, would have the potential to result in the inadvertent discovery of buried, previously unknown archaeological resources. In the event that previously unknown, buried resources were to be encountered during construction, significant impacts could result if the resource(s) are not identified and avoided or properly treated. Therefore, it is expected that mitigation measures would be required, including requirements for monitoring and the preparation of data recovery plans if unknown resources are discovered. Therefore, the EIR will discuss the potential for such resources to be impacted by the proposed project and will identify mitigation measures to reduce impacts of the proposed project on any archaeological resources that may be present. This topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** The project site is not part of a formal cemetery, and therefore, it is unlikely that human remains exist on or in the vicinity of the project site. While unlikely, there is some chance that previously undiscovered human remains could be located within the project site and could be disturbed by construction activities. The proposed project would be required to comply with applicable state and local laws, including Section 7050.5 of the California Health and Safety Code, which requires the County Coroner

to be notified within 24 hours of any human remain discoveries and a stop work until the Coroner has determined the appropriate treatment and disposition of the human remains. If the remains are determined to be Native American, this regulation also requires the Coroner to notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant from the deceased Native American. The Most Likely Descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Nonetheless, preparation of the EIR will involve conducting a cultural resources analysis. The EIR will summarize the findings of these investigations and will describe whether the project could have the potential to disturb any human remains, including those interred outside of formal cemeteries. As such, this topic will be discussed and analyzed in the EIR.

## VI Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** Construction of the proposed project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction equipment/hand tools, site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the proposed project would require electricity for building operation (appliances, lighting, etc.) and fossil fuels related to vehicular transportation to and from the project site. Project operation would also result in indirect energy consumption related to the supply, distribution, and treatment of water, wastewater, and solid waste. The proposed project would be required to comply with all applicable codes and regulations related to energy efficiency and would only represent a small total of the overall energy usage. Therefore, the project is not expected to result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The EIR will include preparation of Air Quality and GHG technical studies which will assist in the determination of the actual amount of energy demand of the proposed project. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** There are numerous state and local plans and policies that promote use of renewable energy and energy efficiency. Examples include the state's Renewable Portfolio Standard and the California Building Energy Efficiency Standards. The Renewable Portfolio Standard initially required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20% of total retail sales by 2017. In 2015, Senate Bill 350 mandated a 50% Renewable Portfolio Standard by 2030. In 2018, Senate Bill 100 increased the Renewable Portfolio Standard to 60% by 2030 and requires all of the state's electricity to come from carbon-free resources by 2045. The California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) was adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality.

The proposed project would be designed and constructed to incorporate sustainable building features and construction protocols required by state and local regulations and plans, including CALGreen and the City of Escondido Climate Action Plan. The proposed project is required to be consistent with existing regulations and therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. Therefore, impacts are anticipated to be less than significant. Nonetheless, the EIR will include a more robust discussion of applicable plans and policies and will provide a consistency analysis for the proposed project, to ensure that the project would comply with such plans policies.

## VII Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

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

**Less Than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code sections 2621 et seq., regulates development near active faults to reduce hazards associated with surface fault rupture. The Act prohibits most structures for human occupancy from being built across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous.

The project site is not mapped within an Alquist-Priolo Earthquake Fault Zone, indicating that earthquake faults are not known to cross the project site (CGS 2022). Additionally, the boundary of the nearest Alquist-Priolo Earthquake Fault Zone, associated with Wildomar Fault, is located more than 16 miles northeast of the project site (CGS 2022). Faulting activity at these faults or other nearby faults could cause ground shaking at the project site. However, because there are no active faults mapped on site, the risk of loss, injury, or death due to ground-surface rupture is not considered likely.

Additionally, construction and operation of the project would not increase or exacerbate the potential for fault rupture to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving fault rupture. Further, as required by the Safety Element of the County of San Diego General Plan, the project would be designed in accordance with all seismic requirements contained in the

California Building Code (CBC) and Uniform Building Code (UBC). Additionally, a geotechnical investigation will be prepared for the project. The findings from the investigation as well as applicable recommendations will be referenced in the EIR. As such, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake faults. Therefore, impacts associated with the rupture of a known earthquake fault are expected to be less than significant. Nonetheless, this issue will be further discussed in the EIR.

ii) Strong seismic ground shaking?

**Less Than Significant Impact.** As stated in the response to VII (a)(i), there are no Alquist-Priolo Earthquake Fault Zones mapped within the project site. The boundary of the nearest Alquist-Priolo Earthquake Fault Zone, associated with Wildomar Fault, is located more than 16 miles northeast of the project site (CGS 2022). However, the project site is located within an area that could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to strong ground shaking at the project site. Although the proposed project could be subject to severe seismic shaking, construction and operation of the project would not increase or exacerbate the potential for earthquakes to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Additionally, the project would be designed in accordance with all seismic requirements contained in the CBC and UBC. Therefore, impacts from ground shaking events are expected to be less than significant. Nevertheless, due to the project's location in a seismically active region, this issue will be further discussed in the EIR.

iii) Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and sand grains lose contact with each other, leading the sediment to lose strength and behave like a liquid. The project site has not been evaluated by CGS for liquefaction hazards (CGS 2022). However, the County of San Diego General Plan Update EIR, Potential Liquefaction Map, does not designate the project site as being susceptible to liquefaction (County of San Diego 2011b, Figure 2.6-3). Additionally, the project would comply with the UBC and CBC for earthquake design. Further, a geotechnical investigation will be prepared for the project and project-specific recommendations related to stabilizing soil on site. As such, impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

iv) Landslides?

**Less Than Significant Impact.** The project site has not been evaluated by CGS for landslide hazards (CGS 2022). Based on a review of the County of San Diego General Plan's Safety Element, there are no areas of high landslide susceptibility mapped within the project site; however, portions of the project site may be moderately susceptible to landslides (County of San Diego 2011a, Figure S-3). A geotechnical investigation will be prepared for the project which will provide project-specific recommendations that will be incorporated during construction to stabilize potential slopes and reduce impacts associated with landslides. Impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** Substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. Surface structures, such as paved roads and buildings, decrease the potential for erosion. Once covered, soil is no longer exposed to wind or water erosion.

The proposed project would cause ground disturbance during construction activities, which can lead to erosion, particularly during a rain event or wind event. However, the construction contractor would be required to comply with the Construction General Permit. The Construction General Permit requires preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Preparation and implementation of the required SWPPP would reduce construction-related erosion to the extent practicable.

The project site would be graded and paved, reducing the possibility for soil erosion or loss of topsoil compared to existing conditions. Introducing more impervious area would result in more surface runoff, which could lead to more soil erosion and loss of topsoil in other areas. However, runoff on the project site would be directed to storm drains and catch basins located on the project site as required by applicable engineering manuals. Additionally, the project site would include landscaping areas which would be pervious, which would help to reduce runoff. Thus, through following the requirements of the Construction General permit and the stabilization of soils through construction of the project and landscape and hardscape features, the project is not expected to result in substantial soil erosion or loss of topsoil and impacts would be considered less than significant. Nonetheless, this issue will be further evaluated in the EIR.

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

**Potentially Significant Impact.** The project site is comprised of Cienega rocky coarse sandy loam and Vista coarse sandy loam and is considered to have a potential for soil expansion (USDA 2022). As indicated above, the project site has not been evaluated by CGS for liquefaction or landslide hazards (CGS 2022). Based on a review of the County of San Diego General Plan's Safety Element, there are no areas of high landslide susceptibility mapped within the project site; however, portions of the project site may be moderately susceptible to landslides (County of San Diego 2011a, Figure S-3). Additionally, the County of San Diego General Plan Update EIR, Potential Liquefaction Map, does not designate the project site as being susceptible to liquefaction (County of San Diego 2011b, Figure 2.6-3). A geotechnical investigation will be prepared for the project and any project-specific recommendations regarding soil and slope stabilization will be referenced in the EIR. Impacts are expected to be less than significant with implementation of the recommendations of the geotechnical report. This issue will be further evaluated in the EIR.

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

**Potentially Significant Impact.** Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The project site is comprised of Cienega rocky coarse sandy loam and



Vista coarse sandy loam. The soil within the project site has a considerably low expansive potential (USDA 2022). Design and construction of the project would be in accordance with the UBC to minimize impacts geologic hazards. Further, a preliminary geotechnical report will be prepared to recommend grading and construction design, and a final geotechnical report may be required to be submitted with project building permits. Therefore, impacts associated with risk to life or property associated with expansive soils are expected to be less than significant with implementation of recommendations from the geotechnical report. Nonetheless, this issue will be further analyzed in the EIR.

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

**No Impact.** The project site would be served by the existing municipal sewer system and no septic systems are either proposed or required to serve the project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact with Mitigation Incorporated.** Per the County of San Diego General Plan Update EIR, Paleontological Sensitivity Map, the project site is not located in an area designated paleontologically sensitive (County of San Diego 2011b, Figure 2.5-3). Nonetheless, as is the case with most other development projects that involve earthwork activity, there is always a possibility—albeit low in this instance—that subsurface construction activity could unearth a potentially significant paleontological resource. As such, a paleontological investigation will be prepared for the project to further address potential paleontological resources that may occur in the area. Additionally, the project would prepare a cultural resources inventory report to investigate potential cultural resources in the project area. Based on the findings from the geotechnical investigation and the paleontological investigation report, applicable mitigation measure(s) will be determined such as requiring the presence of a qualified paleontological monitor during ground disturbing activities. Impacts are anticipated to be less than significant with mitigation incorporated. This issue will be further analyzed in the EIR.

## VIII Greenhouse Gas Emissions

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

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

**Potentially Significant Impact.** The project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the proposed project, as well as building energy and water usage. The project would be subject to a variety of plans and policies that are in place for the reduction of GHG emissions at the state and local level. Such plans and policies include the San Diego Association of Governments (SANDAG) 2021 Regional Plan and the City of Escondido Climate Action Plan. Further analysis is required to determine the estimated project-generated GHG emissions, their impact on global climate change, and the project's compliance with applicable plans and policies for GHG reductions. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** As stated in (a) above, a variety of plans, policies, and regulations are in place for the purpose of reducing GHG emissions. At the state level, the California Air Resources Board (CARB) Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. Under the Scoping Plan, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage) and changes to the vehicle fleet and associated fuels, among others. Another state regulatory action, Executive Order S-3-05, establishes a goal to reduce statewide GHG emissions to the 1990 level by 2020, and to reduce statewide GHG emissions to 80% below the 1990 level by 2050. At the regional level, the SANDAG 2021 Regional Plan sets forth strategies to reduce vehicle miles traveled, to increase use of alternative fuel vehicles, and to improve energy efficiency. At the local level, the City of Escondido has adopted the City of Escondido Climate Action Plan which the project site would be subject to comply with upon annexation. The EIR will evaluate the project's consistency with applicable state, regional, and local plans, policies, and regulations that have been adopted for the purpose of reducing GHGs. Therefore, this issue will be further analyzed in the EIR.

## IX Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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### IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** Allowed uses under the proposed project include light industrial and manufacturing uses, which could involve the transport, use or disposal of hazardous materials. A Phase I Environmental Site Assessment (ESA) will be prepared for the project. In the event hazardous materials are located on site, the Phase I ESA shall provide the appropriate remediation measures. Additionally, the project would be consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control, the California Occupational Safety and Health Administration, Caltrans, and the Resource Conservation and Recovery Act. As such, impacts are anticipated to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** Refer to response above. Allowed uses under the proposed project include light industrial and manufacturing uses, which could involve the release of hazardous materials. In the event hazardous materials are located on site, the Phase I ESA shall provide the appropriate remediation measures. Additionally, any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations. Thus, impacts are anticipated to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

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

**No Impact.** The closest school to the project site is Baypoint Preparatory Academy, located approximately 1.75 miles northwest of the project site. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances (known as the Cortese List). The proposed project site is not on the Cortese List. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

**No Impact.** The closest airport is Palomar-McClellan Airport, located approximately 8.8 miles to the west of the project. Additionally, the project is located within the McClellan-Palomar Airport Influence Area; however, it is not within the Airport Overflight Notification Area (County of San Diego 2021). Due to the project's distance from an airport and because the project site is not within the overflight notification area, development of the project would not result in airport-related hazards. No impact would occur, and this issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** The City is a participant in the Unified San Diego County Emergency Services Organization (USDCEO). The USDCEO Operational Area Emergency Plan (October 2010) contains evacuation routes resulting from a variety of emergencies (USDCEO and County of San Diego 2010). Primary evacuation routes consist of the major freeways, highways, and prime arterials within San Diego County. The closest evacuation route to the project site would be Auto Park Way, located immediately east of the site. Access to the project site would be via two driveways on Country Club Drive. Additionally, the project would be designed to satisfy the emergency requirements of the Escondido Fire Department

and Escondido Police Department. However, because the project would increase the intensity of development compared to the current land use and zoning designations in the County General Plan, the potential exists that the project may interfere with emergency response or evacuation plans without further coordination with applicable agencies. Therefore, impacts associated with an adopted emergency response plan or emergency evacuation plan would be potentially significant. Therefore, this issue will be further analyzed in the EIR.

- g) Would the project 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?

**Potentially Significant Impact.** The project site is largely undeveloped area and covered with vegetation but was previously cleared under prior lawfully granted permits and is annually maintained for fuel modification purposes. The project site is identified as a mix of Very High Fire Hazard Severity Zone (VHFHSZ) (northern portion) and High Fire Hazard Severity Zone (HFHSZ) (southern portion) in a State Responsibility Area (SRA) and is contiguous with other SRA VHFHSZ and HFHSZ areas to the south and west, which are in turn contiguous with VHFHSZs in Local Responsibility Areas (LRAs) to the west and south (CALFIRE 2022). However, the surrounding area to the northwest, north, east and south is largely developed, and areas west of the project site are urbanizing. The conversion of the project site from largely undeveloped to developed would reduce wildland fire risks in the project vicinity. Further, a Fire Protection Plan (FPP) will be prepared for the project and will outline the appropriate measures to reduce wildfire impacts on the project site. Impacts are expected to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

## X Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which if not managed could subsequently degrade downstream receiving waters and violate water quality standards. For example, substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater. However, project grading and construction would be required to be completed in accordance with a National Pollutant Discharge Elimination System-mandated Stormwater Pollution Prevention Plan (SWPPP), which would include standard Best Management Practices (BMPs) to reduce potential off-site water quality impacts related to erosion and incidental spills of petroleum products and hazardous substances from equipment.

Surface water runoff during project operations would be managed through a mixture of strategies that would be designed to remove pollutants from on-site runoff prior to discharge into the storm drain system. Impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

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

**No Impact.** The project involves the development of an approximately 500,000 square-foot business park on predominantly undeveloped land. Operational uses associated with the new business park would create a demand on water supplies. The project site would receive its water from the Rincon del Diablo Municipal Water District (Water District). Based on the Rincon del Diablo Municipal Water District 2020 Urban Water Management Plan (UWMP), the Water District receives treated surface water purchased from San Diego

County Water Authority (SDCWA), which is a blend of imported water and desalination water, and water provided by the City of Escondido which is a blend of raw water from Lake Henshaw and raw water purchased from SDCWA treated at the Escondido Water Treatment Plant (UWMP 2021). The Water District has not used groundwater in the past five years and does not plan to use groundwater within the planning horizon of the UWMP. While the Water District's service area does not contain significant groundwater resources, the Escondido Valley Groundwater Basin is located with the Water District's service area. However, the basin was classified as a low priority basin and does not have a groundwater sustainability plan. The Water District does not have an active role in the management of the basin (UWMP 2021). The project site is not located within the Escondido Valley Groundwater Basin. As such, because the project would not use groundwater during construction or operation and would not be located within the Escondido Valley Groundwater Basin, no impact is expected to occur. However, this issue will be further analyzed in the EIR.

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

- i) Result in substantial erosion or siltation on- or off-site?

**Less Than Significant Impact.** The proposed project would result in construction and operational activities upon land that is predominantly undeveloped. Thus, such activities could potentially have an adverse effect on existing drainage patterns which if unmanaged could result in substantial erosion or siltation on or off site. However, since project construction activities would disturb 1 or more acres, the project would adhere to the provisions of the National Pollutant Discharge Elimination System Construction General Permit. Construction activities subject to this permit include clearing, grading, and ground disturbances such as stockpiling and excavating. The Construction General Permit requires implementation of a stormwater pollution prevention plan, which would include construction features for the project (i.e., best management practices) designed to prevent erosion and protect the quality of stormwater runoff.

Once developed, the project site would include buildings, paved surfaces, and other on-site improvements that would stabilize and help retain on-site soils. The remaining portions of the project site containing pervious surfaces would primarily consist of landscape areas. These landscape areas would include a mix of trees, shrubs, plants, and groundcover that would help retain on-site soils while preventing wind and water erosion from occurring. While the project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent practicable, demolition and construction activities would inevitably result in changes to the internal drainage patterns of the site. Nonetheless, the project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including ensuring that runoff is retained or otherwise dissipated to avoid substantial erosion or siltation. Therefore, impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** Implementation of the proposed project would introduce new impervious area to the project site. A result of impervious area is a potential increase in surface runoff from stormwater which could increase the rate or amount of surface runoff in a manner which could result in flooding on or off site. As previously discussed, the project would result in demolition and the construction of new paved

surfaces, structures associated with the business park, and landscape areas. While the project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent practicable, demolition and construction activities would inevitably result in changes to the internal drainage patterns of the site. The project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. The project would adhere to the Storm Water Quality Management Plan (SWQMP) prepared for the project. Additionally, a Preliminary Hydrology Report and/or Drainage Study would be required to confirm that the project would not result in significant flooding consistent with the San Diego County Hydrology Manual. Therefore, impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** Implementation of the proposed project would involve construction of a new stormwater drain system. The project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. Additionally, the project would adhere to the WQMP prepared for the project. Further, a Preliminary Hydrology Report will be required to confirm that the project would not result in significant flooding consistent with the San Diego County Hydrology Manual. Impacts are expected to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

- iv) Impede or redirect flood flows?

**Less Than Significant Impact.** According to Flood Insurance Rate Maps Number FM06073C0794G and 06073C0813G, the project site is not located within a 100-year flood hazard area (FEMA 2016). Additionally, according to the Department of Water Resources and the County of San Diego General Plan, the project site is not located within a 100-year flood hazard area (DWR 2022) (County of San Diego 2011a, Figure C-2). Additionally, the project site does contain any streams or rivers having the potential to be altered by the proposed project. Therefore, impacts are expected to be less than significant; however, this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** According to Flood Insurance Rate Maps Number FM06073C0794G and 06073C0813G, the project site is not located within a 100-year flood hazard area (FEMA 2016). Additionally, the project site is approximately 11.3 miles inland from the Pacific Ocean and would not be subject to inundation by tsunami. Given that the project site is not located near a large standing body of water (the nearest bodies of water are Olivenhain Dam and Reservoir and Lake Hodges, located approximately 3.23 miles and 3.58 miles away, respectively), inundation by seiche (or standing wave) is considered negligible. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.



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

**Less Than Significant Impact.** The project would comply with regional and local regulations related to water quality control plans. Additionally, as discussed in response (b), while the Water District's service area does not contain significant groundwater resources, the Escondido Valley Groundwater Basin is located with the Water District's service area. However, the basin was classified as a low priority basin and does not have a groundwater sustainability plan. The Water District does not have an active role in the management of the basin (UWMP 2021). The project site is not located within the Escondido Valley Groundwater Basin. As such, because the project would comply with regional and local regulations related water quality control plans and would not be located within the Escondido Valley Groundwater Basin, impacts are expected to be less than significant. However, this issue will be further analyzed in the EIR.

## XI Land Use and Planning

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

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

**Less Than Significant Impact.** The proposed project is located within unincorporated San Diego County and abuts the City of Escondido limits on its eastern and northern edges. The proposed project would be located on a site that currently contains two single-family residences in the northwestern portion of the site. However, the majority of the project site is undeveloped land which was previously cleared and grubbed and is regularly maintained for fuel modification purposes. Direct access to the site is via Country Club Drive which intersects Auto Park Way to the northeast and Harmony Grove Village Parkway to the south.

The project site is located within the San Dieguito Community Plan area of the San Diego County General Plan. The project site is zoned Rural Residential (RR) and Limited Agriculture (A70). The County of San Diego General Plan Land Use Map designates the project site as Village Residential (VR-2) within the north and eastern portion of the site and Semi-Rural Residential (SR-2) within the northwestern and southern portion of the site (County of San Diego 2011a).

The project involves the development of an approximately 500,000 square-foot business park. Following City of Escondido approval, the project site would be annexed into the City. Although the project would remove two existing single-family residences, these isolated residences are not considered to be a

community. As the vast majority of the project site is undeveloped land that does not currently contain a community or provide connection between surrounding communities, development of the project would not divide an established community. Impacts are expected to be less than significant; however, this issue will be further analyzed in the EIR

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

**Potentially Significant Impact.** The proposed project is located within unincorporated San Diego County and abuts the City of Escondido limits on its eastern and northern edges. The project site is located within the San Dieguito Community Plan area of the San Diego County General Plan. The project site has a land use designation of Village Residential (VR-2) within the north and eastern portion of the site and Semi-Rural Residential (SR-2) within the northwestern and southern portion of the site (County of San Diego 2011a). The project site is zoned Rural Residential (RR) and Limited Agriculture (A70).

The Escondido General Plan Land Use map identifies the project site within the City's Sphere of Influence and identifies the project site as Specific Plan Area (SPA #8). SPA #8 is for the Escondido Research and Technology Center, which is an approved Specific Plan easterly of the project site consisting of hospital, industrial, and manufacturing uses. The proposed project involves the development of an approximately 500,000 square-foot business park with uses which would include medical office, warehousing, and industrial, similar to existing uses in the ERTC Specific Plan Area.

Following City of Escondido approval, the project site would be annexed into the City. The proposed project would also require several entitlements and approvals, including a new Specific Plan. Implementation of the entitlements would ensure that the project is compatible with the City of Escondido General Plan Land Use Element and policies once annexed into the City. However, because the project site is located in the County of San Diego, and current regional growth forecasts and associated plans, policies and regulations, are likely based on the County's anticipated land uses and not those of the City of Escondido, impacts would potentially be significant. As such, further analysis is required to address whether the project would conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This topic will be discussed and analyzed in the EIR.

## XII Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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

**Potentially Significant Impact.** The project site is located within unincorporated San Diego County, just outside the City of Escondido and within the City's Sphere of Influence. The project site is located within Mineral Resource Zone 3 (MRZ 3) (County of San Diego 2011a, Figure C-4). MRZ 3 is designated as an area where mineral resources are potentially present but additional evaluation is required to determine the significance of the underlying material. Per the County of San Diego General Plan Mineral Resource Zone Map, the project site is located within the Western Production-Consumption Region Boundary.

As shown in the County of San Diego General Plan Update EIR Existing Mineral Resources map, the project site is not located within or near an area with documented mineral resources (County of San Diego 2011b, Figure 2.10-2). The project site is approximately 5 miles east of the near MRZ-2 site around Lake San Marcos. Additionally, the Escondido General Plan does not identify any zones of locally important mineral resources. Nonetheless, based on the existence of rock outcroppings underlying the project site, impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Refer to response 3.11(a). The project site is located within unincorporated San Diego County, just outside the City of Escondido and within the City's Sphere of Influence. The Escondido General Plan does not identify any zones of locally important mineral resources. Per the County of San Diego General Plan Mineral Resource Zone Map, the project site is located within the Western Production-Consumption Region Boundary. Additionally, the project site is located within Mineral Resource Zone 3 (MRZ 3) (County of San Diego 2011a, Figure C-4).

However, the project site is not located within or near an area with documented mineral resources (County of San Diego 2011b, Figure 2.10-2). The project site is approximately 5 miles east of the near MRZ-2 site around Lake San Marcos. Further, the project site is located within a predominantly urbanized area and mineral extraction land uses would be incompatible with the existing and planned land uses within and around the project site. Nonetheless, based on the existing rock outcroppings underlying the project site, impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

## XIII Noise

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

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

**Potentially Significant Impact.** The proposed project is located within unincorporated San Diego County and abuts the City of Escondido limits on its eastern and northern edges. The project involves the development of an approximately 500,000 square-foot business park. Following City of Escondido approval, the project site would be annexed into the City. Section 17-229 of the City of Escondido's Municipal Code (Noise Ordinance) has established interior and exterior noise regulations that vary depending on time of day. The proposed project could expose persons to noise levels in excess of standards established in the local Noise Ordinance. Construction activities, including grading, demolition, and traffic associated with construction vehicles, can result in a substantial temporary or periodic increase in ambient noise levels. In addition, the proposed project could result in the exposure of persons to excess noise levels due to operation activities and employee and customer vehicles in and around the project site. Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** The proposed project could result in exposure of persons to excessive groundborne vibration or groundborne noise levels during project construction. As previously addressed, construction activities and construction vehicles have the potential to exceed noise standards established in the City of Escondido's Noise Ordinance. Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**No Impact.** The proposed project is not located within the vicinity of a private airstrip. No private airstrips exist within 2 miles of the project site. The closest airport is Palomar-McClellan Airport, located approximately 8.8 miles to the west of the project. The project is located within the McClellan-Palomar Airport Influence Area; however, it is not within the Airport Overflight Notification Area (County of San Diego 2021). Due to the project's distance from an airport and because the project site is not within the overflight notification area, the project would not expose people to excessive noise related to airports. No impact would occur, and this issue will not be further analyzed in the EIR.

## XIV Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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### XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The project would result in the applicable land use and zoning for the project site changing from rural residential and agricultural uses to a business park. The development of a business park would require a temporary construction workforce and a permanent operational workforce, both of which increase population growth in the project area. The temporary workforce would be needed to construct the approximately 500,000-square-foot business park. Operationally, the business park would provide a variety of new employment opportunities at a site that currently contains no such opportunities. SANDAG's 2021 Regional Plan anticipated the City's total employment increasing by 8,166 jobs between 2025 and 2050. Because the final uses are not known at this time, the number of future employees on the project site is too speculative to analyze at this time. Therefore, impacts would be potentially significant, and this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** The project site contains two existing residences on site. These buildings would be removed to facilitate construction of the proposed project. Given that the surrounding area (i.e., the City of Escondido – where the majority of local housing opportunities are located) currently has an estimated vacancy rate of 3.9%, equating to approximately 535 vacant dwelling units (City of Escondido 2021), it is assumed that the residents living on the project site would be able to secure housing from the existing available housing stock in or around the project area. Therefore, impacts associated with displacement of housing and people would be less than significant. This topic will not be further evaluated in the EIR.

## XV Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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### XV. PUBLIC SERVICES

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

v) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
vi) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
vii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
viii) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ix) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Fire protection?

**Less Than Significant Impact.** The proposed project involves construction of new business park uses on site (i.e., professional office, medical office, light manufacturing, etc.). Additional calls for service could result from operation of the project. These additional calls could affect the service ratio, response time, or other performance objectives of fire protection services.

As part of the proposal to annex into the City, LAFCO will evaluate the potential for the City to serve the project site, including providing fire protection services. It is expected that any decision to annex the project site into the City would be based on the City's ability to provide adequate fire protection services. In addition, the project would be expected to pay applicable impact fees, including the Public Facility Fee in accordance with

Resolution No. 2019-152. Therefore, impacts are expected to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

#### Police protection?

**Less Than Significant Impact.** The proposed project includes new construction with new business park uses on site (i.e., professional office, medical office, and light manufacturing.). Additional calls for service could result, which could affect the service ratio, response time, or other performance objectives of police protection services.

As part of the proposal to annex into the City, LAFCO will evaluate the potential for the City to serve the project site, including providing police protection services. It is expected that any decision to annex the project site into the City would be based on the City's ability to provide adequate police protection services. In addition, the project would be expected to pay applicable impact fees, including the Public Facility Fee in accordance with Resolution No. 2019-152. therefore, impacts are expected to be less significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

#### Schools?

**Less Than Significant Impact.** The proposed project would not directly result in the construction of new housing which would generate new students and new demand for school services. Operation of the proposed project could result in full-time employees relocating to the project area, possibly generating new permanent residents within the local area who could increase the current demand on schools. Because the exact uses are not known at this time, the number of future employees and where they choose to live are too speculative to analyze. In addition, the project would be required to pay any applicable statutory school impact fees. Therefore, impacts are expected to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

#### Parks?

**Less Than Significant Impact.** Physical deterioration of park and recreational facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. Operation of the proposed project may result in employees relocating to the area with their families, possibly generating new permanent residents within the local area who could use recreational facilities. However, the proposed project would not include the construction of any infrastructure or housing that is likely to induce significant population growth in the surrounding area. Further, the project would be required to pay any applicable park fees to the City. As such, development of the proposed project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

#### Other public facilities?

**Less Than Significant Impact.** Operation of the proposed project would possibly result in full-time employees relocating to the area with their families, possibly generating new permanent residents within the local area who could increase the current demand on public libraries or other public facilities. As part of the proposal to annex into the City, LAFCO will evaluate the potential for the City to serve the project site, including providing other public services. It is expected that any decision to annex the project site into the City

would be based on the City's ability to provide adequate public services. In addition, the project would be expected to pay applicable impact fees, including the Public Facility Fee in accordance with Resolution No. 2019-152. Impacts are expected to be less than significant. However, this topic will be discussed and analyzed in the EIR.

## XVI Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less Than Significant Impact.** Physical deterioration of park and recreational facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. Operation of the proposed project may result in full-time employees relocating to the area with their families, possibly generating new permanent residents within the local area who could use recreational facilities; however the extent and location of any relocation is speculative. The proposed project would not include the construction of any housing that would significantly introduce population growth in the surrounding area. As such, development of the proposed project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

**No Impact.** The proposed project does not include recreational facilities and as described in (a) above, would not substantially increase demand on existing recreational facilities such that recreational facilities would need to be constructed or expanded. The proposed project would have no impact related to construction or expansion of recreational facilities. This issue will not be further analyzed in the EIR.

## XVII Transportation and Traffic

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

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

**Potentially Significant Impact.** Project operations would involve business park uses (i.e., professional office, medical office, light manufacturing, etc.) that would generate truck and passenger vehicle traffic that may conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, or otherwise result in both localized and broader transportation impacts. An increase in vehicle trips would result in potentially significant impacts. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** The California Senate Bill 743 (SB 743) Vehicle Miles Traveled (VMT) maps provide an estimate of personal vehicle travel by residents and employees within the San Diego region. The California Office of Planning and Research released a Technical Advisory on Evaluating Transportation Impacts in CEQA and the maps provided by the San Diego Association of Governments (SANDAG) are an interpretation of the guidelines provided as a resource to the jurisdictions as they see fit. Vehicle miles traveled during the construction phases of proposed project activities would be temporary. Additional analysis is required to determine whether operation of the proposed project would reduce vehicle miles traveled to and from the project site to less than 85% of the regional average as required under CEQA Guidelines section 15064.3, subdivision (b). Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.



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

**Less Than Significant Impact.** The proposed project would involve construction of a new business park with associated features. Country Club Drive is currently dedicated in its full right of way, and any improvements would be required to be constructed in accordance with the City's Standards for public roadways. Therefore, impacts are anticipated to be less than significant. However, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** Site access would be provided via driveways off of Country Club Drive. Emergency vehicle access would be available at both driveways and facilitated within the entirety of the project site. The project proposes to annex the project site into the City of Escondido. As such, any streets improvements associated with the project would be designed with adequate width, turning radius, and grade to facilitate access by the City of Escondido's firefighting apparatus, and to provide alternative emergency ingress and egress. The site plan would be subject to plan review by the City's Fire Department to ensure proper access for fire and emergency response is provided and required fire suppression features are included. Therefore, impacts are expected to be less than significant; however, this issue will be further analyzed in the EIR.

## XVIII Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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### XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

**Potentially Significant Impact.** As part of the environmental review process, the City will conduct tribal consultation as required by Assembly Bill (AB) 52. Because the consultation process has yet to conclude, it is unknown whether any tribal cultural resources are present on the project site. Therefore, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** See discussion under (a) above.

## XIX Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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### XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The project may require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities for the reasons discussed below.

#### Water and Wastewater Treatment Facilities

The proposed project would be located on a site that currently contains two single-family residences in the northwestern portion of the site. However, the majority of the project site is undeveloped land. The proposed project would remove the two existing single-family residences and construct up to 500,000 square feet of business park uses. Domestic water would be provided to the project site by the Rincon del Diablo Water District. While the project site contains existing waterline connections, they may not be adequately sized to serve the project and, thus, will be upgraded/replaced during project construction, the effects of which will be analyzed in the EIR.

Additionally, wastewater generated by the project would be treated at the Hale Avenue Resource Recovery Facility (HARF) treatment plant. The HARF treats and recycles a significant portion of wastewater and provides reclaimed water for irrigation and industrial/commercial use. While the project site contains wastewater connections, they may not be adequately sized to serve the project and, thus, will be upgraded/replaced during project construction, the effects of which will be analyzed in the EIR. However, because the project would increase the intensity of development on the project site, it is uncertain the extent to which off-site regional water or wastewater facilities may be required to serve the project. Therefore, impacts associated with water and wastewater treatment facilities may be potentially significant. This issue will be further analyzed in the EIR.

#### Stormwater Drainage Facilities

Under existing conditions, the project site is largely undeveloped. Construction of the project would change the existing drainage pattern of the site. As such, the project would include a new engineered stormwater drainage system to mimic the site's existing drainage pattern, the effects of which will be analyzed in the

EIR. The project will prepare the necessary report(s) to address hydraulic impacts and will provide more details regarding the new engineered stormwater drainage system. Impacts are anticipated to be less than significant; however, this issue will be further analyzed in the EIR.

### Dry Utilities

Electricity and natural gas would be provided to the project site via San Diego Gas and Electric. The project site is currently developed on the northwestern portion and is served by existing utilities, including dry utilities consisting of overhead power lines. These present utilities are not adequately sized to serve the project; however, overhead transmission lines run across the southern portion of the project site. The proposed project would relocate or otherwise improve these power lines as part of the proposed project to accommodate development of the project. Thus, the effects of the project on dry utilities will be analyzed in the EIR. Impacts are expected to be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The project involves the development of an approximately 500,000 square-foot business park on predominantly undeveloped land. Operational uses associated with the new business park would create a demand on water supplies. The project site would receive its water from the Rincon del Diablo Municipal Water District. Based on the UWMP, the Water District receives treated surface water purchased from San Diego County Water Authority (SDCWA), which is a blend of imported water and desalination water, and water provided by the City of Escondido which is a blend of raw water from Lake Henshaw and raw water purchased from SDCWA treated at the Escondido Water Treatment Plant (UWMP 2021). The UWMP contains existing and projected water supplies and demands during normal and dry-year scenarios. Tables 1 through 3, show projected water supplies during normal, single, and multiple-dry year conditions, which represents “worst-case” conditions during extended periods of drought when supplies would be reduced.

**Table 1. Normal Year Supply and Demand Comparison (Acre-Feet)**

Normal-Year Scenario	2025	2030	2035	2040	2045
Supply Totals	8,872	9,353	9,500	9,579	9,727
Demand Totals	8,872	9,353	9,500	9,579	9,727

UWMP 2021

**Table 2. Single Dry Year Supply and Demand Comparison (Acre-Feet)**

Dry-Year Scenario	2025	2030	2035	2040	2045
Supply Totals	8,872	9,353	9,500	9,579	9,727
Demand Totals	8,872	9,353	9,500	9,579	9,727

UWMP 2021

**Table 3. Projected Multiple-Dry Year Supply and Demand Comparison (Acre-Feet)**

Dry-Year Scenario	2025	2030	2035	2040	2045
Multiple-Dry Year, First Year					
Supply Totals	9,138	9,634	9,785	9,866	10,021
Demand Totals	9,128	9,634	9,785	9,866	10,021
Multiple-Dry Year, Second Year					
Supply Totals	9,138	9,634	9,785	9,866	10,021
Demand Totals	9,128	9,634	9,785	9,866	10,021
Multiple-Dry Year, Third Year					
Supply Totals	10,380	10,943	11,115	11,207	11,383
Demand Totals	10,380	10,943	11,115	11,207	11,383
Multiple-Dry Year, Fourth Year					
Supply Totals	10,558	11,130	11,305	11,399	11,578
Demand Totals	10,558	11,130	11,305	11,399	11,578
Multiple-Dry Year, Fifth Year					
Supply Totals	8,872	9,353	9,500	9,579	9,729
Demand Totals	8,872	9,353	9,500	9,579	9,729

UWMP 2021

The UWMP shows that projected water supplies and demands would be met during normal and dry-year scenarios. However, because the project would increase water use at the site as compared to existing conditions, impacts are considered potentially significant. Further analysis of the project's water use during operation is required. As such, this issue will be further analyzed in the EIR.

- c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

**Potentially Significant Impact.** The proposed project would involve construction of an approximately 500,000 square foot business park on predominantly undeveloped land. Operation of the project would result in increased wastewater generated at the site. Additional analysis is required to determine if there is adequate capacity to serve the project's projected demand by the local wastewater treatment provider. Impacts are considered potentially significant. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** The proposed project involves demolition and construction activities which would produce solid waste. Additionally, once construction is complete, project operations would generate solid waste that is typical of business park uses. Solid waste generated in the City of Escondido is collected by a private service provider. Solid waste is first brought to a collection and sorting transfer facility in the city before being taken to Sycamore Landfill, located approximate 29 miles south of the site (City of Escondido 2012). Sycamore Landfill has a remaining capacity of 113,972,637 cubic yards and has a maximum daily capacity of 5,000 tons per day (CalRecycle 2022). Additionally, under AB 939, the

Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. As such, the project would adhere to applicable programs to reduce the amount of solid waste entering the landfill. Thus, because the project would adhere to waste reduction programs and would transport waste to a landfill with adequate capacity, it is anticipated that impacts would be less than significant. However, because the project would increase solid waste generation at the site as compared to existing conditions, further analysis of the project's solid waste generation during construction and operation is required. Therefore, this topic will be discussed and analyzed in the EIR.

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

**Less Than Significant Impact.** All collection, transportation, and disposal of solid waste generated by the proposed project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. Therefore, impacts are expected to be less than significant. Nonetheless, this issue will be further discussed in the EIR.

## XX Wildfire

	Potentially Significant Impact	Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** See response IX(f) above. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The project site is largely undeveloped and covered with vegetation but was previously cleared under prior lawfully granted permits and is annually maintained for fuel modification purposes. The project site is identified as a mix of Very High Fire Hazard Severity Zone (VHFHSZ) (northern portion) and High Fire Hazard Severity Zone (HFHSZ) (southern portion) in a State Responsibility Area (SRA) and is contiguous with other SRA VHFHSZ and HFHSZ areas to the south and west, which are in turn contiguous with VHFHSZs in Local Responsibility Areas (LRAs) to the west and south (CALFIRE 2022). It is not anticipated that implementation of the project would exacerbate fire risk, since the project site is surrounded by developed land on all sides and construction of the project would develop currently undeveloped land. Additionally, a Fire Protection Plan (FPP) will be prepared for the project and will outline any applicable measures to further reduce impacts associated with wildfires. Impacts are anticipated to be less than significant. Nonetheless, this topic will be discussed and analyzed in the EIR.

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

**No Impact.** The project site is identified as a mix of VHFHSZ and HFHSZ in a SRA and is contiguous with other SRA VHFHSZ and HFHSZ areas to the south and west, which are in turn contiguous with VHFHSZs in LRAs to the west and south (CALFIRE 2022). The project involves the development of an approximately 500,000 square-foot business park and associated improvements on predominantly undeveloped land but was previously cleared under prior lawfully granted permits and is annually maintained for fuel modification purposes. It is not anticipated that implementation of the project would exacerbate fire risk, since the project site is surrounded by developed land on all sides. Further, the project site is located in an area with surrounding development and would connect to existing utilities. The project would not require installation or maintenance of other associated infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. As such, the project is not expected to expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. No impact is expected to occur; however, this topic will be further analyzed in the EIR.

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

**Less Than Significant Impact.** Under existing conditions, the project site is largely undeveloped but was previously cleared under prior lawfully granted permits and is annually maintained for fuel modification purposes. Construction of the project would change the existing drainage pattern of the site. As such, the project would include a new engineered stormwater drainage system to mimic the site's existing drainage pattern to reduce potential flooding. The project will prepare the necessary report(s) to address hydraulic impacts and will provide more details regarding the new engineered stormwater drainage system. Additionally, the project site is not located within a 100-year flood hazard area (FEMA 2016). Based on a review of the County of San Diego General Plan's Safety Element, there are no areas of high landslide susceptibility mapped within the project site; however, portions of the project site may be moderately susceptible to landslides (County of San Diego 2011a, Figure S-3). A geotechnical investigation will be prepared for the project and referenced in the EIR. The investigation will provide project-specific recommendations that will be incorporated during construction to stabilize potential slopes and reduce impacts associated with landslides. It is anticipated that impacts would be less than significant. Nonetheless, this issue will be further analyzed in the EIR.

## XXI Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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

**Potentially Significant Impact.** As discussed in Section IV, Biological Resources, impacts to habitat for special status wildlife species has previously been mitigated through the off-site preservation of 47.5 acres of coastal sage scrub and non-native grassland. Impacts are considered less than significant. However, further cultural resource investigations are required and will be presented in the EIR to determine any potential impacts that the proposed project would have on important examples of the major periods of California history or prehistory. Therefore, effects to cultural resources will be further examined in the EIR.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

**Potentially Significant Impact.** As described throughout this Initial Study, the proposed project has the potential to result in a variety of potentially significant impacts requiring further analysis in the EIR. It is also anticipated that the proposed project may be developed while other projects in the area are being developed, and the incremental effects of this project may be cumulatively considerable. Therefore, potential cumulative impacts resulting from project construction or operations have the potential to be significant and will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As detailed throughout this Initial Study, the proposed project could result in a variety of significant effects, some of which have the potential to affect human beings. As such, further analysis will be provided in the EIR.

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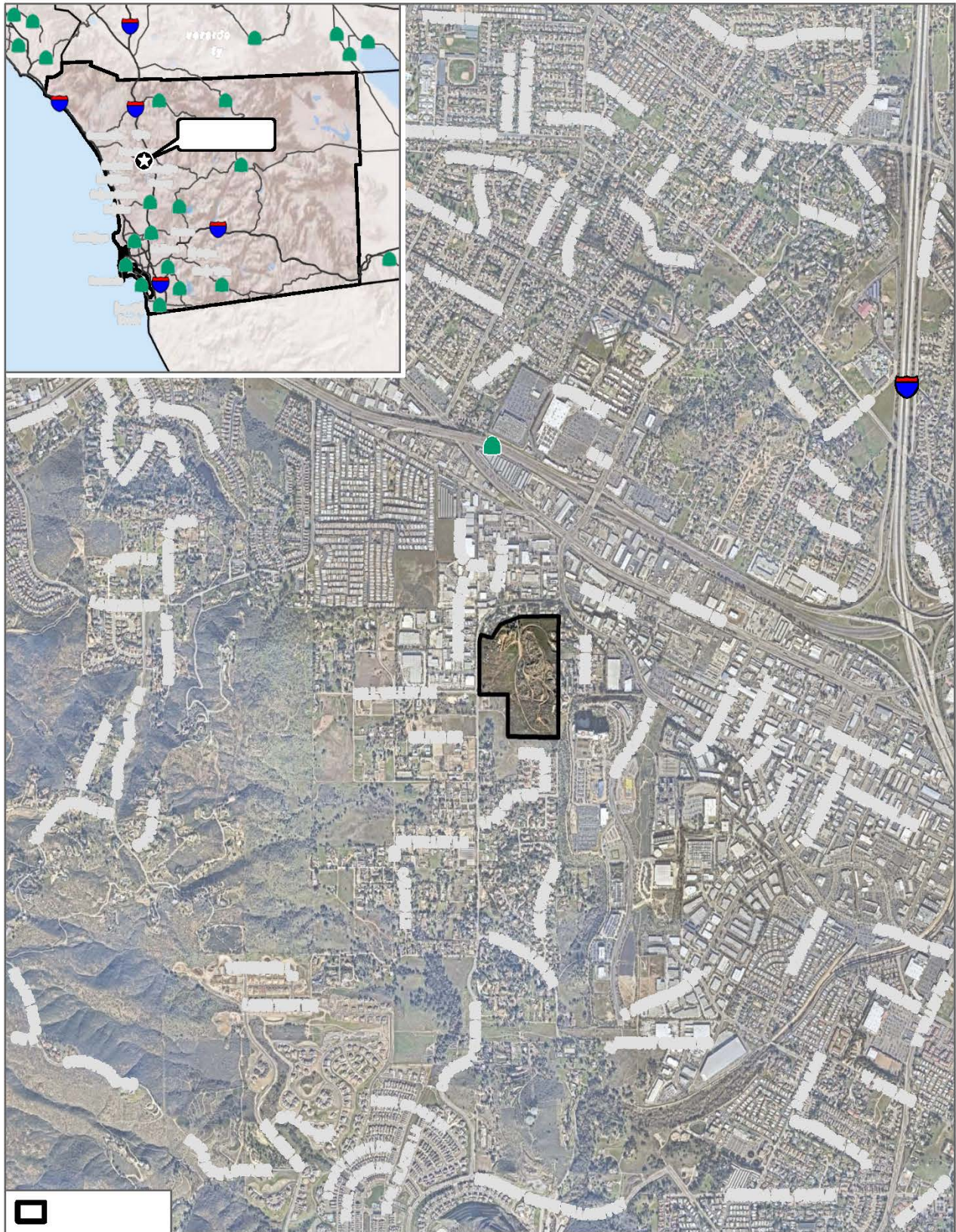
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**FIGURE 1**

**Project Location**





**FIGURE 2**  
**Project Site**  
 Solaris Business Park

SOURCE: SANGIS 2020, 2022





SOURCE: Hamann Companies 2022

**DUDEK**

**FIGURE 3**  
**Conceptual Site Plan**  
 Solaris Business Park