Draft Environmental Document

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
California Environmental Quality Act (CEQA)

13-Lot Residential Development (APN 224-142-01) and Annexation

Project Case # PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015

Submitted to:
City of Escondido
Jay Petrek, AICP, Principal Planner
Planning Division
201 North Broadway
Escondido, CA 92025-2798

Prepared for:
Pacific Land Investors, LLC

Prepared by:
VCS Environmental
30900 Rancho Viejo Road, Suite 100
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949.489.2700

June 2014

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APPENDICES

ESCONDIDO
City of Choice

June 20, 2014

John Kaye
Pacifica Land investors, LLC
111 Pacifica, Suite 130
Irvine, CA 92618

Subject: Environmental Review Determination, Initial Study
(Planning Case Files: PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015)

Dear John:

An analysis of your proposed annexation of approximately 5.7 acres including a Tentative Subdivision Map of 13 lots on approximately 4.2 acres (Planning Case Files noted above) has resulted in the enclosed "Notice of Proposed Mitigated Negative Declaration," issued in draft form. Issuance of this document indicates the City determined the following:

The Initial Study identified potentially significant effects pertaining to biology, noise, transportation / traffic, and hydrology, but revisions in project plans and/or mitigation measures, made by, or agreed to by the applicant would provide mitigation to a point where no significant effects will occur.

Public notice of the proposed Mitigated Negative Declaration has been distributed for public review, ending on July 21, 2014. Depending on the relevance of any public comments received during the public review period, staff reserves the right to change the terms and conclusions of this "Proposed Mitigated Negative Declaration."

If you have questions please feel free to contact me at (760) 839-4556.

Sincerely,

Jay Petrek, AICP
Assistant Planning Director

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CITY OF ESCONDIDO
PLANNING DIVISION
201 NORTH BROADWAY
ESCONDIDO, CA 92025-2798
(760) 839-4671

MITIGATED NEGATIVE DECLARATION

CASE NO.: "Pickering Annexation" PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015

DATE ISSUED: June 20, 2014

PUBLIC REVIEW PERIOD: June 21, 2014 – July 21, 2014

PROJECT DESCRIPTION: Annexation of approximately 5.7 acres involving development of a 13-lot Tentative Tract Map on 4.2 acres with graded peripheral fill slopes up to 13 feet in height, demolition of 1 single family dwelling, related storage structures, and on-site vegetation in the R-1-10 zone (single-family residences – 10,000 SF minimum lot size), and annexation of three adjacent vacant properties (no development proposed) totaling approximately 1.5 acres. The request includes detachment from County Special District 135, construction of various on and off-site streets and utilities infrastructure on portions of Ash Street, Stanley and Lehner Avenues fronting the project. A Development Agreement is also proposed with a five-year term that authorizes construction in exchange for upgrading existing water, street and drainage infrastructure in the area as well as additional fees toward future construction of priority street and drainage improvements in the North Broadway area.

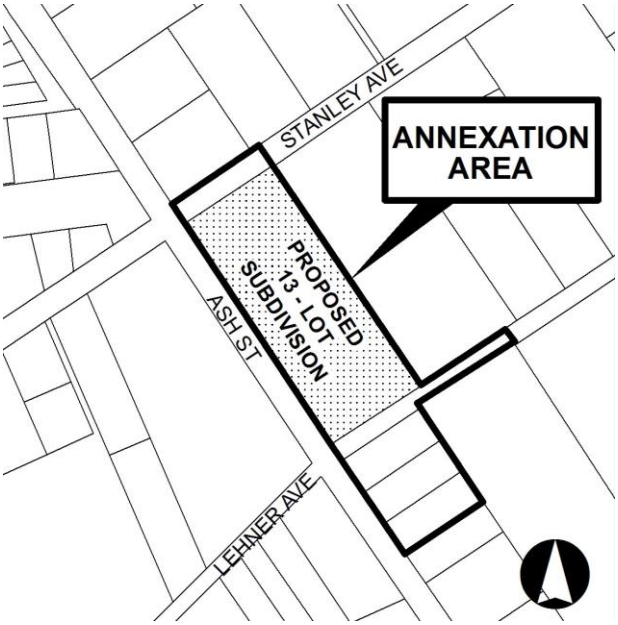
LOCATION: 2056 N. Ash Street, in addition to three vacant properties (APNs 224-142-26, 27, 28) as well as fronting roadways of Stanley and Lehner Avenues

APPLICANT: Pacific Land investors, LLC, 111 Pacific, Suite 130, Irvine CA 92618

An Initial Study has been prepared to assess this project as required by the California Environmental Quality Act and Guidelines, Ordinance and Regulations of the City of Escondido. The Initial Study is on file in the City of Escondido Planning Division.

Findings: The findings of this review are that the Initial Study identified potentially significant impacts associated with biology, noise, transportation & traffic and hydrology. However, mitigation measures incorporated into the project, and agreed to by the applicant, would reduce impacts to a less than significant level.

Jay Petrek, AICP
Assistant Planning Director



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CITY OF ESCONDIDO
PLANNING DIVISION
201 NORTH BROADWAY
ESCONDIDO, CA 92025-2798
(760) 839-4671

ACKNOWLEDGEMENT OF ENFORCEABLE COMMITMENT

Planning Case No.: PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015

The items listed on the attached Mitigation Monitoring Program constitute an enforceable commitment in conformance with Section 21081.6(b) of the California Environmental Quality Act (Public Resources Code Sections 21000-21178). The applicant shall be required to provide, and comply with, all of the mitigation measures listed herein. These mitigation measures also have been included as conditions of the project approval.

Date	Applicant's Name (printed)	Applicant's Signature
6-17-14	Pacific Land Investors, LLC Mark Ferraro, President	

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MITIGATION MONITORING PROGRAM

City of Escondido

13-Lot Residential Development (APN 224-142-01) and Annexation

Project Case # PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015

TABLE 1: MITIGATION MONITORING PROGRAM

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
IV. Biology	Trees	**BIO-1a**: Impacts to 51 mature trees shall be mitigated by replacement of 51 mature trees at a one-to-one (1:1) ratio with a minimum size of a 24-inch box, and the 1 protected tree shall be replaced at a 2:1 ratio with a minimum size of a 24-inch box, or as otherwise determined by the City Planning Department.	Replacement of trees	Applicant	City of Escondido	Prior to occupancy	One-time planting
IV. Biology	Trees	**BIO-1b:** Any mature trees removed as part of the future development of the Additional Annexation Area would be replaced at a 1:1 ratio with a minimum size of a 24-inch box. If any protected trees are located in the Additional Annexation Area at the time of the future development, they will be replaced at a 2:1 ratio with a minimum size of a 24-inch box (Zoning Code Section 33-1069).	Replacement of trees	Applicant	City of Escondido	Prior to occupancy	One-time planting
IV. Biology	Non-Native Grassland	**BIO-2:** Impacts to NNG within the Additional Annexation Area shall be mitigated at a reduced ratio of 0.5:1 through the acquisition of NNG credits from the Daley Ranch Bank or other approved mitigation bank.	Purchase of credits from Daley Ranch Bank	Applicant	City of Escondido	Prior to issuance of grading permit	One-time planting
IV. Biology	Raptor Nests	**BIO-3**: A qualified biologist shall	Surveys if	Applicant	City of	Pre-	Pursuant to

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
		determine if any active raptor nests occur on or in the immediate vicinity of the Project Area if construction is set to commence or continue into the breeding seasons of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of site, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.	construction between January 1 to September 1. Avoidance and buffer if nests found.		Escondido	construction	measure
IV. Biology	Nesting Birds	**BIO-4**: If Project construction cannot be avoided during the period of January 1 through September 1, a qualified biologist will survey potential nesting vegetation within the Project Area for nesting birds, prior to commencing any Project activity. Surveys will be conducted at the appropriate time of day, no more than three days prior to vegetation removal and/or disturbance. Documentation of surveys and findings will be submitted to the City for review and concurrence prior to conducting Project activities. If no nesting birds were observed and concurrence was received, Project activities may begin. If an active bird nest is located, the nest site will be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions, and this area will not be disturbed until after September 15 or until the nest becomes inactive. If threatened or endangered species are observed	Surveys if construction between January 1 to September 1. Avoidance and/or buffer if nests found.	Applicant	City of Escondido	Pre-construction	Pursuant to measure

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
		within 500 feet of the work area, no work will occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.					
IX. Hydrology & Water Quality	Drainage facilities	**HYD-1a:** Adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows.	Drainage improvements	Applicant/ Contractor	City of Escondido	During Construction	N/A
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-1:** The Project Applicant and/or contractor shall ensure that all construction equipment will have properly operating mufflers.	Maintain Equipment	Applicant/ Contractor	City of Escondido	During Construction	Daily monitoring during project construction
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-2:** Noise and groundborne vibration construction activities whose specific location on the Project Area may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses.	Locate equipment away from sensitive receptors	Applicant/ Contractor	City of Escondido	During Construction	Daily monitoring during project construction
XII. Noise	During construction, there is a potential of exposure to	**N-3:** Construction activities associated with the proposed Project shall, to the extent feasible, be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes	Construction scheduling monitoring use of impact tools	Applicant/ Contractor	City of Escondido	During Construction	Daily monitoring during project construction

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
	high noise levels.	high noise levels. When the use of impact tools are necessary, they shall be hydraulically or electrically powered when feasible to minimize noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used and external jackets on the tools themselves shall be used where feasible.					
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-4:** The Applicant shall locate stationary construction noise sources away from adjacent receptors, to the extent feasible, and ensure that they are muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible.	Locate equipment away from sensitive receptors	Applicant/ Contractor	City of Escondido	During Construction	Daily monitoring during project construction
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-5:** If the Project is under the jurisdiction of the County at the time of development, the Applicant and/ or Contractor shall notify all construction workers prior to the commencement of construction that activities generating impulsive noise levels at the Project Area must be limited to no more than 15 minutes in a given hour when such activities are located adjacent to an off-site sensitive receptor (residence). Impulsive noise is defined by the County as a single noise event or a series of single noise events that causes a high peak noise level of short duration (one second or less) measured at a specific location (Section 36.410 of the County's	Construction worker education/notification	Applicant/ Contractor	County of San Diego	During construction	Daily monitoring during project construction

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
		Noise Abatement and Control Ordinance).					
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-6:** The applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who shall be responsible for responding to any concerns regarding construction noise and vibration.	The liaison's telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that include permitted construction days and hours.	Applicant/ Contractor	City of Escondido	During Construction	Daily monitoring during project construction
XII. Noise	During construction, there is a potential of exposure to high noise levels.	**N-7:** Construction activities shall be limited to permitted construction hours designated by the applicable jurisdiction for the project at the time of development. If the project is under the jurisdiction of the County at the time of development, construction activities shall be limited to between the hours of 7:00 A.M. and 7:00 P.M. from Monday through Saturday. Further, no construction activity shall be undertaken on Sundays and recognized County holidays (Section 36.408 of the County's Noise Abatement and Control Ordinance). If the project is under the jurisdiction of the City at the time of development, construction activities shall be limited to between the hours of 7:00 A.M. and 6:00 P.M. from Monday through Friday, and between the hours of 9:00 A.M. and 5:00 P.M. on Saturdays. Further, no construction	Limit hours of construction operation	Applicant/ Contractor	City of Escondido and County of Escondido	During Construction	Daily monitoring during project construction

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
		activity shall be undertaken on Sundays and recognized City holidays (Section 17-234 of the City's Municipal Code).					
XII. Noise	During occupancy	**N-8:** Prior to the issuance of a certificate of occupancy, the Applicant shall ensure that all exterior windows associated with the proposed residential uses at the Project Area shall be constructed to provide a sufficient amount of sound insulation to ensure that interior noise levels would be below an Ldn or CNEL of 45 dB in any room.	Sound insulating windows	Applicant/ Contractor	City of Escondido	Prior to occupancy	One-time review
XVI. Transportation & Traffic	Decrease in service at the N. Ash Street / Lehner Avenue intersection	**T-1:** N. Ash Street / Lehner Avenue - The applicant/developer shall improve this intersection prior to construction of the 40th unit within the Lehner / Stanley block (the area bound by N. Ash Street / Conway Drive / Lehner Avenue and Stanley Avenue). Dedicated turn lanes should be provided at the southbound, westbound and northbound approaches. The applicant/developer will be responsible for all widening, transitions, necessary right of way acquisitions and other aspects of the design and construction process to the City Engineer's satisfaction. School related signing and striping should be implemented at the intersection per the Manual on Uniform Traffic Control Devises (MUTCD).	Improvement of intersection.	Applicant	City of Escondido	Prior to construction of 40th unit	N/A

Issue	Potential Impact	Mitigation Measures	Action	Implement-ing Entity	Governing Agency	Implement-ation Timing	Monitoring Frequency
XVI. Transportation & Traffic	Decrease in service at the N. Ash Street / Vista Avenue intersection	**T-2**: N. Ash Street / Vista Avenue - The applicant/developer shall improve this intersection with dedicated turn lanes on all approaches prior to construction of the 40th dwelling unit within the Lehner / Stanley block (the area bound by N. Ash Street / Conway Drive / Lehner Avenue and Stanley Avenue). School related signing and striping should be implemented at the intersection per the MUTCD. The applicant/developer will be responsible for all widening, transitions, necessary right of way acquisitions and other aspects of the design and construction process to the City Engineer's satisfaction.	Improvement of intersection payment of fair share.	Applicant	City of Escondido	Prior to construction of 40th unit	N/A
XVI. Transportation & Traffic	Increased traffic and construction scheduling	**T-3**: No construction material or equipment deliveries should be scheduled during peak school pick-up/drop-off periods	Schedule deliveries to not interfere with school traffic.	Applicant	City of Escondido	During construction	Daily
XVI. Transportation & Traffic	Pedestrian mobility	**T-4**: The Development shall construct a 4 foot wide pedestrian path along Conway Street between Rincon Avenue and Stanley Avenue	Construct pedestrian path.	Applicant	City of Escondido	During construction	N/A
XVI. Transportation & Traffic	Increased traffic	**T-5:** Prior to the issuance of a building permit, the applicant/developer shall deposit with the City a Fair Share Contribution for the construction of a traffic signal at the N. Ash Street/Vista Avenue intersection to the satisfaction of the City Engineer	Funding per Development Agreement.	Applicant	City of Escondido	Prior to issuance of building permits	N/A

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INITIAL STUDY / ENVIRONMENTAL CHECKLIST

PROJECT TITLE

13-Lot Residential Development (APN 224-142-01) and Annexation
Case Numbers: PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015

LEAD AGENCY

City of Escondido
201 North Broadway
Escondido, CA 92025

Prepared by:
VCS Environmental
30900 Rancho Viejo Road, Suite 100
San Juan Capistrano, CA 92675-1763

PROJECT CONTACT

Jay Petrek, Assistant Planning Director
City of Escondido
Planning Division
jpetrek@escondido.org
(760) 839-4556

PROJECT LOCATION

The Project, as defined in the following sections, is located at the northern limits of the City of Escondido (City) (Figure 1). The Project's proposed residential development site is bounded by North Ash Street to the west, Stanley Avenue to the north and Lehner Avenue to the south. The proposed City annexation area includes the development site's footprint as well as an approximate 280-foot segment of Stanley Avenue, an approximate 530–foot segment of Lehner Avenue and 3 contiguous parcels south of Lehner Avenue (Figure 2).

PROJECT PROPONENT

Mark Ferraro
Pacific Land Investors, LLC
111 Pacifica, Suite 130
Irvine, CA 92618

GENERAL PLAN / ZONING

County Zoning (existing): Semi-Rural Residential of 1 dwelling unit per 1 gross acre, slope less than 25%.
County General Plan Designation (existing): SR-1 (1 DU/1, 2, 4 ac) – Agriculture. One unit per acre allowed density.

City of Escondido Zoning (pre-zoned): R-1-10 for Single-Family Residential – Suburban - 10,000 square feet minimum lot size.
City General Plan Designation (existing): Residential – Suburban (3.33 units/acre)

PROJECT DESCRIPTION

The proposal analyzed in this Initial Study is comprised of two elements: the "Development" and the "Additional Annexation Area." The Development includes the Tentative Tract Map (TTM; Figure 3), the annexation of the development depicted on the TTM, and the Development Agreement associated with the TTM. The Additional Annexation Area includes the approximate 280-foot segment of Stanley Avenue, an approximate 530–foot segment of Lehner Avenue, and three contiguous parcels (APN 224-142-26, 27 and 28) located south of Lehner Avenue. Collectively, these two elements define the "Project." The "Development Site" is the area shown on the TTM and the off-site improvements, and the "Project Area" includes the Development Site and the Additional Annexation Area. The Development Agreement between the City and the applicant/developer defines the cost sharing arrangements for public infrastructure improvements and off-site street improvements, as described below. The case numbers associated with the Project are PHG 13-0043, PHG 13-0044, SUB 13-0011, ENV 13-0015.

The Development proposes the construction of 13 single-family detached residences on an approximately 4.2-acre site (APN 224-142-01); one existing single-family residence and various outbuildings and horse stables would be demolished. The Development will result in on-site infrastructure improvements, including a new local street, underground utilities, and a bioretention basin to treat storm flows, and off-site improvements to existing streets by providing additional turn lanes at 3 intersections.

The Development lies within the North Broadway Region of Influence, which has had critical infrastructure deficiencies with respect to streets, drainage and water storage and delivery. Per City Ordinance 94-16, should adequate facilities not be available within the region of influence, development projects are subject to the approval of a development agreement. The agreement must ensure that the project either provide facilities necessary to upgrade existing deficiencies or financially participate toward their solution. The applicant/developer proposes to contribute to improvements as required by the Project's Development Agreement, which will allow the construction to proceed in return for funding the upgrade of existing water, street and drainage infrastructure in the area. As described in the Development Agreement, compensation for these upgrades includes payment of a Community Benefit Fee of $12,500 per dwelling unit for street and traffic improvements. The Development Agreement also requires that the applicant reimburse the owner of Tract 889 $3,555 per dwelling unit for construction of the 12" water line along Stanley Avenue between Ash Street and Conway Drive. Regarding street infrastructure improvements, dedicated turn lanes will be constructed at the southbound, westbound and northbound approaches of the N. Ash Street / Lehner Avenue intersection and at all approaches of the N. Ash Street / Vista Avenue intersection. In addition, the Development will include construction of a

traffic signal at the N. Ash Street / Vista Avenue intersection and construction of a 4-foot-wide pedestrian path along Conway Street between Rincon Avenue and Stanley Avenue.

Adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows. The selection of the drainage alternative will be made at the time of final engineering in conjunction with final drainage studies. The City will give final approval of the selected alternative.

The Project includes annexation of unincorporated San Diego County (County) land by the City of Escondido (City). No existing residences or structures are found on APNs 224-142-26, 27 and 28 and none are proposed. If future development is proposed on these three parcels, that development could be subject to additional California Environmental Quality Act (CEQA) review if the future development constitutes a project under CEQA. The Development Site and Annexation Area lie within the City's sphere of influence and share the existing County land use designations shown above. They also share the City's pre-zone land use designations and upon Annexation would assume the pre-zone designation of Single-Family Residential. The pre-zone designation will allow for 13 homes on the Development Site and 5 homes on the remaining 3 parcels of the Additional Annexation Area.

ENVIRONMENTAL SETTING

The Development site is bounded by North Ash Street to the west, Stanley Avenue to the north and Lehner Avenue to the south. The site is currently accessed from North Ash Street. The Project Area consists of 1 single-family residence with landscaping, small citrus orchard, horse stables, and small man-made pond used to store drinking water for the horses. The site is relatively flat with elevations on the site ranging from approximately 730 feet in the south to 760 feet in the north above mean sea level. Vegetation includes residential landscaping (grass, mature trees, and shrubs) and non-native grasses; some areas are unvegetated. All areas are disturbed from current uses. Adjacent land uses consist of vacant property on the west across North Ash Street, large lot single family residential homes to the north across Stanley Avenue, partially vacant property with animal stables to the east, and vacant land to the south across Lehner Avenue. The 3 parcels south of Lehner Avenue included in the Project Area consist of vacant land, with the southernmost parcel currently being used for storage of approximately 8 vehicles, 1 boat, 1 steel storage container, and miscellaneous construction debris.

REQUIRED AGENCY APPROVALS

- *Federal Agencies:* None
- *State Agencies:* None
- *City/County Agencies:* Local Agency Formation Commission (LAFCO) annexation, City of Escondido Development Agreement, Tentative Tract Map (TTM) approval, City of Escondido Grading Permit
- *Financing Approval and Participation Agreements:* Community Benefit Fee/Infrastructure Deficiency Fee

PROPOSED ACTIONS

- Approval of 13 lot single-family subdivision involving grading exemptions with peripheral fill slopes up to 13 feet in height.

- Development Agreement involving payment of certain fees and construction of various improvements.
- Annexation to the City of Escondido and detachment from County Special District 135 of approximately 5 acres.
- Construction of various on- and off-site street and utility improvements.
- Demolition of 1 single-family dwelling unit and related storage/shed structures and on-site vegetation
- Certification of Mitigated Negative Declaration

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors, as marked below, would potentially be affected by this Project.

☐	Aesthetics	☐	Land Use/Planning
☐	Agriculture and Forestry Resources	☐	Mineral Resources
☐	Air Quality	■	Noise
■	Biological Resources	☐	Population/Housing
☐	Cultural Resources	☐	Public Services
☐	Geology/Soils	☐	Recreation
☐	Greenhouse Gas Emissions	■	Transportation/Traffic
☐	Hazards & Hazardous Materials	☐	Utilities/Service Systems
■	Hydrology/Water Quality	■	Mandatory Findings of Significance

DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the Project. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that although the proposed Project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature: Date:

Printed Name: Title:

INITIAL STUDY CHECKLIST

I. Aesthetics

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

I. Aesthetics Discussion

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

Less Than Significant Impact. City and County guidelines do not have an established definition of a scenic vista or criteria thresholds for determining the significance level of a project's potential impacts on a scenic vista. However, for purposes of CEQA, a scenic vista is generally defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Because the Project will be situated in a low-lying area that is surrounded by existing semi-rural and single-family residential development, the Development Site and Additional Annexation Area offer no opportunity for expansive views of important visual resources recognized by the City or County such as scenic corridors, geographically extensive scenic viewsheds, ridgelines, unique landforms, or visual gateways.

The Resource Conservation Element of the City's General Plan identifies the community's steep slopes, primary and secondary ridgelines, and prominent natural landforms, including a partial view of City-recognized intermediate ridgelines approximately 0.8 mile away looking east from the Project Area. The Development and future structures on the Additional Annexation Area will obstruct the partial view of the intermediate ridgelines while traveling north or south along a 230-foot segment of North Ash Street. The remaining 480-foot segment of North Ash Street adjacent the proposed Development Site and Additional Annexation Area has existing structures and landscaping, which currently obstructs the view of these intermediate ridgelines. Because the existing view of the ridgelines is partially obstructed and not expansive, the partial obstruction resulting from the proposed Development and future construction of the Additional Annexation Area is considered less than significant.

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. There are no state scenic highways located near the Project Area and the site will not be visible from a scenic highway. The nearest scenic highways are located over 10 miles away, which include State Route 78 and parts of Interstate 15.

c) *Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?*

Less Than Significant Impact. The existing development in the area is a mixture of single-family residences, equestrian uses, and Rincon Middle School. The site supports mature trees, located primarily in the northern portion of the Development Site. The largest tree is a Peruvian pepper tree and is 51 inches in diameter at breast height (dbh). This tree is located close to the residential unit, in a recessed patio area. While the tree is large and dominates the patio area, it is not a visual feature from the road or other areas of the Project Area.

The removal of this tree or the other trees would not substantially impact scenic resources. As the City's General Plan becomes fully implemented, the surrounding area will be developed as a suburban residential neighborhood. The addition of 13 single-family residences will not substantially alter the overall appearance or degrade the existing visual character of the area because it will be consistent with nearby existing development and future planned development. The proposed annexation allows for increased density from 1 residence per acre to 1 residence per 0.23 acre (or up to a total of 18 residences in the Project Area, 13 of which result from the Development). Increased density in of itself will not substantially degrade the existing visual character or quality of the area because the type of development will remain single-family residential under both current zoning conditions and post-annexation zoning conditions.

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

Less Than Significant Impact. The proposed Development's design incorporates the use of varied setbacks and grade differences to ensure that potential light or glare will not impact the surrounding properties. The Development will comply with the City's Outdoor Lighting Ordinance (Escondido Zoning Code Article 35) and with the County of San Diego's Division 9 Light Pollution Code, which will ensure potential impacts associated with glare or light will be minimized for the benefit of neighbors and the astronomical research at Palomar Observatory. The use of shielded, outdoor light fixtures will reduce potential glare or light impacts to below significant levels. The future developments associated with the Additional Annexation Area will also comply with these lighting requirements. Therefore, no significant light or glare impacts will result from the proposed Project.

Source(s): California Scenic Highway Mapping System (CA Department of Transportation, 2013); City of Escondido General Plan (City of Escondido, 2012); Field Investigation; North County Metropolitan Subregional (County of San Diego, 2011); San Diego County General Plan (County of San Diego, 2011); Project Description.

II. Agricultural and Forest 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. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with existing agricultural zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

II. Agricultural and Forest Resources Discussion

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

No Impact. The Project Area is identified as "Other Land" and "Urban and Built-up Land," and is surrounded by "Urban and Built-up Land"; none of the Project Area is identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the Farmland Mapping and Monitoring Program.

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

No Impact. The County currently designates the zoning for the Project Area as Semi-Rural Residential, not agricultural or farmland. Upon annexation, the Project Area would assume the City zoning designation of R-1-10 Single-Family Residential – 10,000 square feet minimum lot size. In addition, the Project Area is not involved in a Williamson Act Contract or other

agricultural land contract. Therefore, the Project will not conflict with existing agricultural zoning or a Williamson Act contract.

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 Area is not currently zoned by the County as forest land and contains neither timberland resources nor an association with timberland resources or timberland production.

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

No Impact. The Project Area neither contains forest land nor would it result in the conversion of forest land.

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

No Impact. The Project Area contains neither farmland nor forest land. Project implementation, compliance with the Development Agreement, and the annexation would not result in the conversion of farmland or forest land.

Source(s): California Important Farmland Finder (California Department of Conservation, 2013); City of Escondido General Plan (City of Escondido, 2013); Field Investigation; North County Metropolitan Subregional (County of San Diego, 2011); San Diego County General Plan (County of San Diego, 2011); Project Description

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. – Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

III. Air Quality Discussion

An Air Quality and Greenhouse Gas Emissions Technical Report was prepared by ESA (April 2014) to analyze the Development's potential impacts on air quality based on City and County standards (Appendix B). Development design revisions occurring after production of the report have proposed a reduced density to allow for a 13-unit Development rather than a 14-unit Development. Therefore, the following analysis is based on development of the originally proposed 14 units, and thus, presents a more conservative analysis of the Development's potential impacts than are anticipated under currently proposed conditions.

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

No Impact. Based on the air quality technical report for the Development, proposed construction of 13 single-family dwelling units on the approximately 4.2-acre Development Site will be consistent with the "Suburban" land use category designated for the site under the City's previous (1990) and current (2012) General Plan. The annexation of 3 contiguous parcels south of Lehner Avenue will also be consistent with the City's General Plan designation. As such, implementation of the proposed Project will be in conformance with the City's General Plan, and thus, consistent with San Diego Association of Governments (SANDAG) and County Regional Air Quality Strategy (RAQS) growth forecasts. Accordingly, the Project's emissions have been accounted for in the RAQS, which was created to bring the San Diego Air Basin (SDAB) into attainment for ozone. Additionally, as discussed below, the Development's construction and operational emissions will not exceed the City's established CEQA significance criteria for air quality in its Environmental Quality Regulations (EQR). Consequently, the Development will conform to the City's quality of life standards. Furthermore, the Project will be required to comply with all applicable rules and regulations established by the County San Diego Air

Pollution Control District (SDAPCD) during construction activities within the Development (i.e., SDAPCD Rule 50 [Visible Emissions], Rule 51 [Nuisance], Rule 55 [Fugitive Dust], and Rule 67 [Architectural Coatings], etc.). Therefore, implementation of the proposed Project will not conflict with applicable air quality plans.

b) *Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Less Than Significant Impact. Impacts to air quality standards could potentially result from construction and operation of the proposed Development. A discussion for each phase is included below.

Construction: Construction activities associated with the proposed Development will generate pollutant emissions from the following construction activities: (1) site demolition (2) site preparation, grading, and excavation; (3) construction workers traveling to and from the Development Site; (4) delivery and hauling of construction supplies to, and debris from, the Development Site; (5) fuel combustion by onsite construction equipment; (6) building construction; application of architectural coatings; and paving. These construction activities will temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis will vary, depending on the intensity and types of construction activities occurring simultaneously at the time.

Table 2 summarizes the modeled worst-case daily emissions of criteria air pollutants and ozone precursors associated with the proposed Development's construction activities. As shown in Table 2, the maximum daily construction emissions generated by the proposed Development over the course of the construction schedule will not exceed the City's CEQA significance thresholds or County SDAPCD's recommended threshold levels. Thus, air quality impacts from construction are considered to be less than significant.

TABLE 2: PROPOSED DEVELOPMENT REGIONAL CONSTRUCTION EMISSIONS (UNMITIGATED)

	Estimated Maximum Daily Emissions (lbs/day)*					
Construction Activities	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Site Demolition						
Fugitive Dust Emissions	--	--	--	--	2.60	0.39
Off-Road Emissions	4.53	44.81	33.27	0.04	2.46	2.33
On-Road Emissions	040	4.72	4.26	0.01	0.40	0.16
Total Emissions	**4.93**	**49.53**	**37.53**	**0.05**	**5.46**	**2.88**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No
Site Preparation						
Fugitive Dust Emissions	--	--	--	--	6.02	3.31
Off-Road Emissions	2.38	25.09	18.36	0.02	1.51	1.39
On-Road Emissions	0.05	0.06	0.55	0.00	0.08	0.02
Total Emissions	**2.43**	**25.15**	**18.91**	**0.02**	**7.61**	**4.72**

	Estimated Maximum Daily Emissions (lbs/day)*					
Construction Activities	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No
Grading						
Fugitive Dust Emissions	--	--	--	--	7.05	3.44
Off-Road Emissions	3.44	36.04	23.33	0.02	2.12	1.95
On-Road Emissions	0.06	0.07	0.71	0.00	0.11	0.03
Total Emissions	**3.50**	**36.11**	**24.04**	**0.02**	**9.28**	**5.42**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No
Building Construction						
Off-Road Emissions	3.20	23.30	16.17	0.02	1.86	1.76
On-Road Emissions	0.04	0.16	0.44	0.00	0.05	0.02
Total Emissions	**3.24**	**23.46**	**16.61**	**0.02**	**1.91**	**1.78**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No
Paving						
Off-Road Emissions	2.00	21.00	12.67	0.02	1.26	1.16
On-Road Emissions	0.09	0.11	1.10	0.00	0.17	0.04
Subtotal Emissions	*2.09*	*21.11*	*13.77*	*0.02*	*1.43*	*1.20*
Architectural Coatings						
Coatings	43.80	--	--	--	--	--
Off-Road Emissions	0.45	2.78	1.92	0.00	0.25	0.25
On-Road Emissions	0.00	0.01	0.05	0.00	0.01	0.00
Subtotal Emissions	*44.25*	*2.79*	*1.97*	*0.00*	*0.26*	*0.25*
Total Emissions	**46.34**	**23.90**	**15.74**	**0.02**	**1.69**	**1.45**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No

Notes:
* Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units.
N/A = non-applicable.

The Additional Annexation Area will permit an additional 5 units on three parcels south of Lehner Avenue, resulting from the zone change and increased allowable density. Construction of the 5 units is not proposed as part of this Project and will occur at a later date. Because air quality thresholds are based on daily emissions and because the 5 units will be built at a future

date separate from the 13-unit Development, it is estimated that construction impacts associated with the 5 units, 8 fewer units than analyzed in the table above, will also not exceed thresholds. Therefore Project impacts to air quality will be less than significant.

Operation: Implementation of the proposed Project will result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products, in addition to operational mobile emissions. According to the traffic impact analysis prepared for the Development, construction of the 13 single-family residential dwelling units will result in 140 additional vehicle trips per day.[1] Operations emissions associated with the proposed Development were modeled using CalEEMod, where model defaults were adjusted to reflect project-specific data, where available, including the size and type of the proposed land use. Modeled operations emissions are presented in Table 3 below.

TABLE 3: PROPOSED PROJECT OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)					
Emissions Source	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	0.82	0.01	1.18	0.00	0.03	0.03
Energy Sources	0.01	0.10	0.04	0.00	0.01	0.01
Mobile Sources	0.71	1.66	7.40	0.01	0.91	0.26
Total Emissions	**1.54**	**1.77**	**8.62**	**0.01**	**0.95**	**0.30**
City CEQA Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed City Threshold?	No	No	No	No	N/A	No
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No

As shown in Table 3, implementation of the proposed Development will result in long-term regional emissions of criteria air pollutants and ozone precursors that are below the City's and SDAPCD's CEQA significance thresholds. Therefore, operational emissions from the Development will not result in or substantially contribute to emissions concentrations that exceed the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) and no mitigation will be required.

The Additional Annexation Area will potentially add an additional 5 units (40 additional vehicle trips per day) on three parcels south of Lehner Avenue resulting from the zone change and increased allowable density. The Traffic Impact Analysis (TIA) technical consultant determined that traffic generated by the Additional Annexation Area (i.e., 40 ADT) will contribute to less than the day to day fluctuations of traffic in the study area (LLG, 2014). In other words, quantifying the potential impacts of the 4 additional units neither increases the study's accuracy beyond the margin of error nor leads the study to different conclusions. Therefore, potential air

[1] Analysis is based on the Development's originally proposed 14 units, which generate 140 ADT, rather than the currently proposed 13 units, which generates 130 ADT. This document relies on the more conservative analysis.

quality impacts associated with additional vehicle traffic from the Additional Annexation Area have been analyzed as part of the Development's TIA and the findings are less than significant.

c) *Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Less Than Significant Impact. A cumulative impact arises when two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant impacts, meaning that the Project's incremental effects must be viewed in connection with the effects of past, current, and probable future projects.

The generation of daily construction and operational emissions associated with cumulative development could result in a cumulative significant impact associated with the cumulative net increase of ozone, PM_{10} and $PM_{2.5}$ for which the region is in non-attainment. The proposed Project will be consistent with the RAQS, which is intended to bring the SDAB into attainment for all criteria pollutants. In addition the daily emissions generated during construction and operation by the Development and in the future from the Additional Annexation Area will not exceed the County's screening-level thresholds or the City's CEQA significance thresholds that have been established as quality of life standards. Therefore, the Project's contribution to cumulative air quality impacts will be less than significant.

d) *Would the Project expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. The closest sensitive receptors are a single-family residence across Stanley Avenue to the North (approximately 190 feet from the Development Site to the residence building) and Rincon Middle School across Lehner Avenue to the south (approximately 125 feet from the Development site to the nearest school building). According to the Development's Air Quality technical report, construction and operation of the proposed Development could potentially expose sensitive receptors located within and adjacent to the Development Site to Carbon Monoxide (CO) hotspots and concentrations of toxic air contaminants (TACs) from onsite sources during Development construction as well as TACs from operational sources.

Carbon Monoxide Hotspots: CO concentration is a direct function of motor vehicle activity (e.g., idling time and traffic flow conditions); particularly during peak commute hours and certain meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses such as residential areas, schools, and hospitals. The Development will increase the amount of vehicular traffic on existing roads by 140 average daily vehicle trips, with the potential of lowering the Level of Service (LOS) on those roads, and therefore increasing CO concentrations associated with increased vehicle activity.

Of the five study intersections analyzed in the traffic impact analysis for the proposed Development, one is signalized, one is a one-way stop controlled (OWSC) intersection, and the remaining are all all-way stop controlled (AWSC) intersections. The proposed Development's traffic impact analysis indicates that the one signalized intersection (N. Broadway and Vista Avenue) will continue to operate at an acceptable LOS with the addition of the proposed

Development. In addition, all the other intersections will continue to operate at their existing/acceptable LOS levels with the addition of the Development once all mitigation related to transportation and traffic is implemented. As such, because the addition of 140 average daily vehicle trips by the Development will not adversely affect the existing traffic conditions in the Project Area, impacts associated with CO hotspots will be less than significant and no mitigation is required.

Concentrations of Toxic Air Contaminants: The Development's construction will result in short-term emissions of diesel Particulate Matter (PM), which is a TAC. The exhaust of off-road heavy-duty diesel equipment will emit diesel PM during site preparation (e.g., excavation, grading, and clearing); paving; installation of utilities, materials transport and handling; building construction; and other miscellaneous activities. SDAPCD has not adopted a methodology for analyzing such impacts and has not recommended that health risk assessments be completed for construction-related emissions of TACs. However, because off-road heavy-duty diesel equipment will be used only temporarily, Project construction will not substantially expose sensitive receptors to substantial emissions of TACs.

As the proposed Project will involve the development of single-family residential uses within the Project Area, Project operation will not introduce any new stationary sources of TACs, such as diesel-fueled backup generators that are more commonly associated with large commercial and industrial uses. In addition, the Project is sited 1.2 miles away from the nearest freeway, well over the 500-foot threshold set by CARB to avoid exposure of residents to TACs. Based on the criteria in the California Air Resources Board (CARB) guidance document, it can be ascertained that the proposed Project will not have the potential to expose sensitive receptors to TACs from mobile sources to an extent that health risks could result.

e) *Would the Project create objectionable odors affecting a substantial number of people?*

No Impact. Residential developments do not include any uses that have been identified as being associated with odors such as dairy operations or chemical plants. Thus, the proposed Project is not expected to result in objectionable odors for future residents or for the neighboring uses.

During construction of the proposed Project, exhaust from equipment and activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors will be a minor, temporary source of nuisance to adjacent uses, and will not affect a substantial number of people. As odors associated with Project construction will be temporary and intermittent in nature, and will likely appreciably disperse onsite, the odors will have no impact.

Source(s): Air Quality and Greenhouse Gas Emissions Technical Report (ESA, 2014); Project Description

IV. Biological Resources

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on biological resources involved within a jurisdictional water feature as defined by federal, state or local regulations (e.g., Section 404 of the Clean Water Act, Section 401 of the Clean Water Act, Section 1602 of California Fish and Game Code, Porter-Cologne Water Quality Control Act, etc.) through direct removal, filing, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☒	☐

IV. Biological Resources Discussion

A project-specific habitat assessment and tree survey of the Development Site were performed by VCS Environmental on July 31, 2013. VCS Environmental prepared the Habitat Assessment and Tree Survey Report to analyze the Development's potential impacts to the site's existing biological resources (Appendix C).

The Development site (approximately 4.2 acres) primarily consists of different agricultural uses (pasture, equestrian corrals and pens, backyard orchard) as well as a single-family residence. While there are some native plant species on site, the site does not contain any native habitat. Ornamental and native tree species are scattered throughout the property with dense canopy existing around the residential structures. The Additional Annexation Area is comprised of disturbed undeveloped land; 2 of the 3 lots proposed to be annexed adjacent to the Development Site are vacant, the third lot is a storage area for trucks, cars, and other vehicles and a few storage facilities. Table 4 shows the habitats in the Development Site and the Additional Annexation Area.

TABLE 4: HABITAT TYPES BY ACREAGE

Habitat Type	Acreage within the Development Site (including road improvements)	Acreage for Additional Annexation Area
Disturbed/Ruderal	0.13	0.26
Developed/Residential	0.69	
Developed/Agricultural	2.61	
Agricultural/Pasture	0.43	
Agricultural/Orchard	0.17	
Eucalyptus stand	0.09	
Willow stand	0.08	
Disturbed Non-native Grassland		1.27
TOTAL	**4.20**	**1.53**

Development Site

Disturbed/Ruderal

These areas within the Development Site are compacted being occasionally subject to vehicle activity and include ruderal, non-native plant species such as ripgut brome (*Bromus diandrus*), oats (*Avena* sp.), Bermuda grass (*Cynodon dactylon*), wild radish (*Raphanus sativus*), and prickly lettuce (*Lactuca serriola*). Disturbed habitat observed on-site includes the entire southern and western roadside edges of the portion of the Development Site along Lehner Avenue and North Ash Street.

Developed/Residential

This land cover type includes residential and associated areas that are considered disturbed as a result of the residential activities. Developed areas also include ornamental landscaping and grass lawns, and storage of equipment and vehicles. There are a few scattered native trees within this area.

Developed/Agricultural

Developed/Agricultural habitat is comprised of equestrian and other domestic animal land uses. Generally the ground is bare dirt with occasional ruderal, non-native species. There are some native and some landscaped trees growing throughout the agricultural/developed portion of the site.

Agricultural/Pasture

Agricultural/Pasture land is pasture for the horses on site. This area differs from the agricultural/developed portion of the site in that it appears to be irrigated with a relatively full cover of herbaceous plants including non-natives such as Bermuda grass, cheeseweed (*Malva parviflora*), and perennial ryegrass (*Festuca perennis*), and native alkali mallow (*Malvella leprosa*). The sprinkler system is visible; no surface water leading to this area was observed.

Agricultural/Orchard

The back yard of the residence contains a small citrus (*Citrus* sp.) orchard. The small orchard is located in the northern portion of the Development Site and is bordered by Stanley Avenue.

Willow stand

A small isolated stand of native willow trees is found in the southern portion of the Development Site. The understory is comprised of ruderal, non-native species such as ripgut brome, oat, and Bermuda grass, as found in the disturbed habitat adjacent to Lehner Avenue. No evidence of surface water or flow was observed.

Eucalyptus stand

The non-native, invasive stand of eucalyptus trees is found on the western edge in the southern portion of the Development Site. The understory is comprised of ruderal, non-native species such as ripgut brome, oats, and Bermuda grass. The remaining non-native trees within the Development Site were included as part of the other dominant land covers.

The Additional Annexation Area (approximately 1.53-acre area plus approximately 0.32 acre roadway)

The 1.53-acre undeveloped area proposed for annexation to the south of the proposed Project is comprised of 0.26 acres of disturbed ruderal and 1.27 acres of disturbed non-native grassland (NNG). See Table 4 and Figure 2. The off-site intersection improvements associated with this Project would occur in previously disturbed areas consisting primarily of dirt and non-native ground cover.

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 the U.S. Fish and Wildlife Service?*

Less Than Significant Impact. The Development would not directly or indirectly adversely affect candidate, sensitive or special status species (Habitat Assessment and Tree Survey, 2014), as none are known to be present at or near the Development Site. The 1.27-acre NNG within the Additional Annexation Area would not be disturbed as part of the Development, and future development in the Additional Annexation Area would either avoid or provide compensation for the loss of this habitat. No California Natural Diversity Database (CNDDB) occurrences were found in the Project Area. The nearest CNDDB record, the coastal California gnatcatcher (*Polioptila californica californica*) [CAGN], occurs approximately 0.9 mile northwest of the Project Area and was observed in 2000. No critical habitat was identified on the Project Area. The nearest critical habitat is located approximately 0.7 mile to the northwest and northeast of the Project Area for the CAGN. No coastal sage scrub (CSS) or riparian habitat exists within the Project Area. No CAGN were observed during the field survey. The onsite eucalyptus trees provide potential roosting habitat for raptors, but no evidence of nesting or roosting raptors was observed during the habitat survey. Mature trees removed by the Project would be replaced as required by Mitigation Measures BIO-1a and 1b. Potential future impacts to NNG from development on the Additional Annexation Area will be reduced to below significance with the implementation of Mitigation Measure BIO-2 Pre-construction surveys for raptors and nesting birds required by Mitigation Measures BIO-3 and BIO-4 will reduce potential impacts to these species below significance.

The Project Area is located in the Northwestern Habitat Area (NHA), which is described in the Multiple Habitat Conservation Program (MHCP) as dominated by Coastal Sage Scrub (CSS) and chaparral. No CSS or chaparral is found on the subject property. The NHA is made up of privately

owned parcels and is constrained by urban development to the south and agriculture lands to the north and west. The North County Multiple Species Conservation Plan (MSCP) subarea is north of this habitat area. The Project is located in an area that is largely developed, and no indirect impacts due to edge effects (e.g., habitat fragmentation, lighting, noise, urban runoff) would be expected to occur.

The Development would result in the loss of potential raptor roosting/nesting habitat (palm and eucalyptus trees). NNG in the general surrounding area supports small burrowing rodents, which in turn are part of the food supply for the local raptor population. The Development will not result in the loss of NNG, however approximately 1.27 acres of disturbed NNG would potentially be lost to future development in the Additional Annexation Area. Given the current disturbed state, however, the habitat does not provide substantial benefit to wildlife. Any future loss of NNG would be subject to mitigation requirements pursuant to the City's draft Subarea Plan, which requires impacts to NNG to be mitigated at a reduced ratio of 0.5:1 through the acquisition of NNG credits from the Daley Ranch Bank or other approved mitigation bank. Mature trees removed by the Project would be replaced as required by Mitigation Measure BIO-2.

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, and regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?*

No Impact. The Project Area shows no evidence of surface water or surface flows that would be associated with riparian habitat by any plan, policy, regulation or regulatory agency. No critical habitat or other sensitive natural community was identified. Therefore, the modification of existing on-site disturbed habitat would be less than significant. See also, Response IV.a.

c) *Would the Project have a substantial adverse effect on biological resources involved within a jurisdictional water feature as defined by federal, state or local regulations (e.g., Section 404 of the Clean Water Act, Section 401 of the Clean Water Act, Section 1602 of California Fish and Game Code, Porter-Cologne Water Quality Control Act, etc.) through direct removal, filing, hydrological interruption, or other means?*

No Impact. No evidence of surface water was observed on the Development Site during the Habitat Assessment survey. Aerial reconnaissance detected no surface water on the Additional Annexation Area. At Lehner Avenue, the topographic low-point of the property, there was no evidence of flow observed alongside the road. English plantain (*Plantago lanceolata)*, with a facultative indicator of FAC-U, occurred scattered along the roadside. A catch basin is located along Lehner Avenue, receiving water from areas east and south of the property. No flowing water or ponding was observed. The results of the assessment indicate that there are no jurisdictional waters onsite and therefore the Project would not affect biological resources associated with a jurisdictional water.

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 is not near an established native resident or migratory wildlife corridor. The Project will not substantially impede the use of native wildlife nursery sites. The temporal loss of mature trees will result in less than significant impact with the implementation of mitigation measure BIO-1a.

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

Less Than Significant With Mitigation. A total of 51 mature trees and 1 protected Coast Live Oak tree will be removed as part of the Development. The Additional Annexation Area has one mature palm tree and 3 mature ornamental trees, based on observations from the street and aerial imagery. For compliance with the City's mature tree preservation requirements and to reduce impacts to a level below significance, the 51 removed mature trees as part of the Development would be replaced at a 1:1 ratio with a minimum size of a 24-inch box, and the 4 protected Coast Live Oak trees would be replaced at a 2:1 ratio with a minimum size of a 24-inch box (Zoning Code Section 33-1069). See Mitigation Measure BIO-1a.

A project-specific tree assessment would need to be conducted to assess the impacts from the future development on the Additional Annexation Area. For compliance with the City's mature tree preservation requirements and to reduce impacts to a level below significance, the removed mature trees as part of the future development of the Additional Annexation Area would be replaced at a 1:1 ratio with a minimum size of a 24-inch box. If any protected trees are located in the Additional Annexation Area at the time of the future development, they will be replaced at a 2:1 ratio with a minimum size of a 24-inch box (Zoning Code Section 33-1069). Implementation of Mitigation Measure BIO-1b would bring this potentially significant impact to less than significant.

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. The City of Escondido General Plan and the Escondido Subarea Multiple Habitat Conservation Plan (MHCP), a component of the San Diego County Multiple Species Conservation Plan (MSCP), were consulted as part of the Habitat Assessment and Tree Inventory Survey performed for the Development. The Project Area is located within the boundaries of the MHCP, and the Project impacts would not be in conflict with adopted provisions of this applicable plan.

Source(s): City of Escondido General Plan (City of Escondido, 2013); City of Escondido Municipal Code (City of Escondido, 2013); Field Investigation; Habitat Assessment and Tree Survey (VCS Environmental, 2014); Project Description

Biological Resources Avoidance, Minimization, and Mitigation. The following mitigation measure would be implemented to minimize potential impacts:

BIO-1a: Impacts to 51 mature trees shall be mitigated by replacement of 51 mature trees at a one-to-one (1:1) ratio with a minimum size of a 24-inch box, and the 1 protected tree shall be replaced at a 2:1 ratio with a minimum size of a 24-inch box, or as otherwise determined by the City Planning Department.

BIO-1b: Any mature trees removed as part of the future development of the Additional Annexation Area would be replaced at a 1:1 ratio with a minimum size of a 24-inch box. If any protected trees are located in the Additional Annexation Area at the time of the future development, they will be replaced at a 2:1 ratio with a minimum size of a 24-inch box (Zoning Code Section 33-1069).

BIO-2: Impacts to NNG within the Additional Annexation Area shall be mitigated at a reduced ratio of 0.5:1 through the acquisition of NNG credits from the Daley Ranch Bank or other approved mitigation bank.

BIO-3: A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the Project Area if construction is set to commence or continue into the breeding seasons of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of site, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.

BIO-4: If Project construction cannot be avoided during the period of January 1 through September 1, a qualified biologist will survey potential nesting vegetation within the Project Area for nesting birds, prior to commencing any Project activity. Surveys will be conducted at the appropriate time of day, no more than three days prior to vegetation removal and/or disturbance. Documentation of surveys and findings will be submitted to the City for review and concurrence prior to conducting Project activities. If no nesting birds were observed and concurrence was received, Project activities may begin. If an active bird nest is located, the nest site will be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions, and this area will not be disturbed until after September 15 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work will occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

V. Cultural Resources

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

V. Cultural Resources Discussion

The Cultural and Paleontological Resources Assessment was prepared for the Development Site. No access to the Additional Annexation Area was provided, however, the records search conducted for the analysis of the potential impacts at the Development Site included the Additional Annexation Area. The results of the record search indicate that the Additional Annexation Area has a low probability for cultural resources. While a site reconnaissance was not conducted on the Additional Annexation Area, given the disturbed, vacant nature of this area, it is unlikely that a site reconnaissance of this area would reveal a potential historic or paleontological artifact. Therefore, the discussion and conclusions in this section pertain to the Project as a whole.

a) *Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

No Impact. A field survey of the Development Site was conducted on September 19, 2013. A Cultural and Paleontological Resources Assessment (October 18, 2013) was conducted of the Development Site by Duke CRM to assess the Development's potential impacts to existing cultural resources. Information from the South Coastal Information Center (SCIC) indicated that 23 previous cultural resources investigations have been conducted within ½ mile of the Development Site, and that one study included the current Development boundaries (Kyle 2006). The SCIC identified seven previously recorded cultural resources within ½ mile of the Project, as described below.

- CA-SDI-1050, the closest of these resources, is a Pauma Complex site with scattered chipping waste and 5 manos, but no midden, approximately 300 feet from the northeast corner of the Development, on the top of the hill across Stanley Avenue. The site was originally recorded by Del True in 1962. In addition to noting the lack of a midden deposit he recommended that no recheck or further work was necessary. This site has been destroyed.

- CA-SDI-1049, a lightly scattered temporary campsite with a sub-surface component.
- CA-SDI-1057, a San Luis Rey I-II village, with possible Pauma Complex materials added.
- CA-SDI-1058, a Pauma Complex village with no midden.
- CA-SDI-1245, a milling station with a midden, remains of an adobe house, and another historic house; and
- CA-SDI-15357, a large bedrock outcrop with milling features.

None of these resources were previously recorded in the Development Site. In 2006, Kyle surveyed three parcels to the east of the Development Site to Conway Drive, and did not identify any cultural resources. The Kyle report recommended that no additional work be conducted in the Development Area.

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

No Impact. The cultural resources assessment conducted on the proposed Development Area indicated a low to moderate sensitivity for cultural resources and a low sensitivity for paleontological resources. No known cultural resources will be impacted. Therefore, no recommendations are made for further investigation on the Development Site. While no cultural resources are expected to be discovered during construction based on the field survey and research, a qualified archaeologist would be available for consultation should cultural resources be discovered during the construction phase of the Development to assess the nature and significance of the find.

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

No Impact. Published geological maps (Kennedy and Tan 2005) describe the underlying geology as Mesozoic-age metamorphic rocks. Site records housed in the Department of Paleontology at the San Diego Natural History Museum indicate that no fossil localities occur within the vicinity of the Project Area, and the nearest fossil locality is approximately 10 miles to the west. The paucity of fossil localities is mostly due to the abundance of Mesozoic-age igneous and metamorphic rocks in the vicinity of the Project Area. These rock types have very little paleontological sensitivity because the high temperatures and/or pressures at which they are formed are not conducive to fossil preservation.

d) *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

No Impact. No human remains are known to exist at the Development Site and therefore no impacts are expected to occur. However, as a BMP, all requirements and protocols would be followed should human remains be discovered during ground disturbance. To comply with State Health and Safety Code Section 7050.5, if human remains are encountered, the County Coroner must be notified of the find immediately. No further disturbance would occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely

Descendant (MLD). The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Source(s): Draft Cultural and Paleontological Resources Assessment (Duke CRM, 2013); Field Investigation; Project Description

VI. Geology and Soils

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Expose people or structures to 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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994 or most current edition), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒

VI. Geology and Soils Discussion

As part of the geotechnical investigation of the Development Site, the rough grading plan, the requirements of the 2010 California Building Code (CBC), and the City's Building Code were reviewed. The geotechnical report is also based on the geotechnical investigation of the site which included research, field investigation (subsurface samples) and laboratory testing, as well as geotechnical review and knowledge of similar projects on adjacent or nearby parcels. Due to a lack of access, the Additional Annexation Area was not included in the subsurface sampling; however, based on the geologist's extensive knowledge of the Project Area generally, it is expected that the geological conditions of the Additional Annexation Area are the same as the Development Area. Therefore, the discussion and conclusions in this section pertain to the Project as a whole.

a) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

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

No Impact. A Geotechnical Study was performed by Petra (November 18, 2013) to analyze the Development's potential impacts to geology and soils (Appendix E). The nearest active fault to the Project Area is the Elsinore fault zone, located approximately 12± to 14± miles northeast of the Development Site. Furthermore, according to the geotechnical report completed for the Development, the Project Area does not lie within the boundaries of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act.

ii) ***Strong seismic ground shaking?***

No Impact. The geotechnical report indicates that the Project Area is neither located in an Earthquake Fault Zone nor does the site contain soils or other geological conditions that would result in strong seismic ground shaking.

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

No Impact. The General Plan Figure VI-9 indicates that the Project Area is located in a Liquefaction Hazard Area. However, according to the Geotechnical Studies the Development Area would not be susceptible to earthquake-induced soil liquefaction and landsliding based on the Seismic Hazard Zones map established by the California Division of Mines and Geology (CDMG). In addition, given the composition of soils and dense bedrock materials, the possibility of earthquake induced soil liquefaction, which requires loose granular soils, is considered very unlikely. Because the topography of the area contains only gradual slopes, the possibility of an earthquake induced landslide is also negligible.

iv) ***Landslides?***

No Impact. See answer a.iii) above.

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

Less Than Significant Impact. Because the Development Site is located on existing gradual slopes, the potential for erosion does exist without proper design considerations and implementation measures aimed to eliminate erosion problems. The relatively flat Additional Annexation Area has a lesser potential for erosion, but proper design considerations are essential to control erosion at any location. The measures recommended in the Standard Grading Specifications of the Development's 2013 Geotechnical Study would be implemented at both the Development and the Additional Annexation Area to eliminate the possibility of substantial soil erosion and loss of topsoil. They include measures for Best Management Practices (BMPs) during project construction activities and measures for landscaping to control erosion during Project operation. With implementation of these Standard Grading Specifications including the BMPs, potential impacts would be less than significant.

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

No Impact. Based on conclusions drawn from the Development's geotechnical studies and in consideration of the proposed grading plans and planned development, the Project Area contains stable geological characteristics and soils that would support the Development and future development in the Additional Annexation Area. The Development and future development would follow recommendations for site preparation and grading included in the 2013 geotechnical report (or equivalent). Loose topsoil would be excavated and appropriate fill materials compacted consistent with the grading plans. Furthermore, the Development and future development would be required to comply with the California Building Code and City of Escondido building requirements.

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

Less Than Significant Impact. The results of the geotechnical studies for the Development indicate that the majority of near surface soils in the Project Area are collapsible and are essentially non-expansive; the loose natural soil encountered in the upper 2 to 3 feet, in some areas, is susceptible to collapse upon the introduction of water and/or additional loads. These surficial soils have a variable expansion potential that ranges from very low to moderate. Recommendations for treatment of expansive soil described in the geotechnical studies (or equivalent) would be implemented in order to eliminate the potential impacts to people and property. These include either the strategic placement of soils at a safe distance from proposed structures and/or the blending and re-compacting of expansive soil with non-expansive soil. Loose soils would be removed near the surface and appropriate fill would be placed where needed for structural integrity. In addition, footings and slabs would be constructed consistent with procedures of the California Building Code applicable to expansive soils. These measures for the Development and the future development in the Additional Annexation Area would ensure impacts are less than significant.

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

No Impact. The proposed Development and the future development on the Additional Annexation Area are would have access to existing City wastewater infrastructure from Lehner Avenue and would not require the use of septic tanks or alternative wastewater disposal systems.

Source(s): City of Escondido General Plan (City of Escondido, 2013); Geotechnical Study (Petra, 2013); Geotechnical Study (American Geotechnical, Inc., 2004); Field Investigation; Preliminary Soils Investigation (CEI, 2004); Project Description

VII. Greenhouse Gas Emissions				
Would the Project:				
	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

VII. Greenhouse Gas Emissions Discussion

An Air Quality and Greenhouse Gas Emissions Technical Report was prepared by ESA (April 2014) to analyze the Development's potential impacts to Greenhouse emissions (GHGs) (Appendix B). Development design revisions occurring after production of the report have proposed a reduction in density to allow for a 13-unit Development. Therefore, the following analysis is based on development of 14 units rather than 13 units, and thus, presents a more conservative analysis of the Development's potential impacts than would actual proposed conditions. The proposed Development would generate GHGs from a variety of sources. First, GHG emissions would be generated during construction of the project. Once fully operational, the Development's operations would generate GHG emissions from both area sources and mobile sources. Indirect source emissions associated with the proposed residential uses include electrical consumption, water and wastewater usage (transportation), and solid waste disposal. Mobile (direct) sources of air pollutants associated with the proposed Development would consist of motor vehicles trips generated by residents and visitors. Similar but lesser (5 residential units, not 13) GHG emissions would be generated from developing the Additional Annexation Area.

Based on a review of Appendix B of the City of Escondido Greenhouse Gas Emissions Adopted CEQA Thresholds and Screening Tables document, and given that the proposed Project would only consist of 13 single-family residential units on the Development Site and an additional increase of 5 units on the Additional Annexation Area, it is concluded that the GHG emissions generated by the Project would not exceed 2,500 MT CO2e per year. Thus, the GHG emissions attributable to the Project would be less than significant.

Nonetheless, pursuant to full disclosure under CEQA, the estimated construction and operational GHG emissions associated with the Development have been quantified as part of this analysis to further confirm that the total annual emissions of the Project would not exceed 2,500 MT CO_2^e per year (ESA, 2014).

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

Less Than Significant Impact. The proposed Development consists of the construction of 13 single family residential dwelling units at an approximately 4-acre Development Site. The

Development Site's construction GHG emissions were estimated using the same assumptions and methodology as the air quality analysis and are shown in Table 5. As shown in Table 5, the total GHG emissions that are anticipated from construction of the proposed Development would be approximately 154 MT CO_2^e. Construction emissions would be temporary. The temporary construction emissions from developing the future Additional Annexation Area would only occur later in time from the Development and the total GHG emissions that are anticipated from construction of the smaller future development (5 residences) would generate less than 154 MT CO_2^e.

During operations, area and indirect emissions sources associated with the proposed Development and future development on the Additional Annexation Area would primarily result from electricity and natural gas consumption, water and wastewater transport (the energy used to pump water and wastewater to and from the project site, respectively), and solid waste generation. GHG emissions from electricity consumed onsite by the proposed Development and future development would be generated offsite by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport are also indirect emissions resulting from the energy required to transport water from its source, and the energy required to treat wastewater and transport it to its treated discharge point. In addition, the residential uses at the Development Site and at the future development of the Additional Annexation Area would also generate mobile source emissions from motor vehicle trips generated by residents and visitors. The various operational GHG emissions associated with the proposed Development are shown in Table 5. Overall, the proposed Development's total annual GHG emissions resulting from construction and operational activities would be 415 MT CO_2^e per year. The future development's total annual GHG emissions resulting from construction and operational activities of 5 residences on the Additional Annexation Area would be less than 415 MT CO_2^e per year.

Table 5: ESTIMATED PROJECT CONSTRUCTION AND OPERATIONS-RELATED GHG EMISSIONS

Emission Source	Proposed Development Emissions CO_2e (MT/yr)*
Construction	
Total	154
Operations	
Mobile Sources	182
Electricity Consumption	33
Natural Gas Consumption	21
Water Consumption	7
Solid Waste	7
Area Source	11
Subtotal	261
TOTAL ANNUAL PROJECT EMISSIONS	**415**[a]
City Screening Threshold	900
Significant Impact?	No

NOTES: * Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units.
CO_2e= carbon dioxide equivalent; MT/yr = metric tons per year; see Appendix A for CalEEMod model outputs.

[a] The total project annual GHG emissions include both construction and operational emissions. It should be noted that construction emissions would only be temporary and would only occur in 2014 when the Project is being constructed. After 2014, only the project's operational GHG emissions would be generated.

As shown in Table 5, the Development's construction and operational GHG emissions, which would occur together in 2014 only, would not exceed the 2,500 MT of CO_2^e per year. While the future development's construction and operational GHG emissions would be less than 415 MT of CO_2^e per year, for purposes of analysis, we have assumed that the GHG emission from the future development equals 415 MT of CO_2^e per year. Thus, the proposed Project would, over time, generate less than 950 MT of CO_2^e per year, not result in the generation of substantial levels of GHG emissions, and would not result in emissions that would adversely affect the statewide attainment of GHG emission reduction goals of AB 32. This impact would be less than significant.

Furthermore, with respect to the County's interim approach to addressing climate change in CEQA documents, the County of San Diego Department of Planning and Land Use follows the recommendations by the South Coast Air Quality Management District (SCAQMD) in their interim guidance for evaluating GHGs under CEQA, where it is recommended that a project's construction emissions be amortized over 30 years and added to the project's operational emissions. Based on the total construction emissions shown in Table 5 (154 MT of CO2e), the Development's construction-related GHG emissions would equal to approximately 5 MT of CO2e per year after amortization over 30 years per County of San Diego DPLU methodology. When this annual amount of 5 MT of CO2e is added to the Development's annual operational emissions of 261 MT of CO2e, an annual total of 266 MT of CO2e would result, which would not exceed the County's interim screening threshold of 900 MT of CO2e per year. Using the analysis presented above regarding the future development of the Additional Annexation Area, the

Project's annual total amortized emissions would not exceed the County's interim screening threshold of 900 MT of CO2e per year. Thus, based on the County's interim approach to addressing climate change in CEQA documents, the proposed Project would not result in the generation of substantial levels of GHG emissions and would not result in emissions that would adversely affect the statewide attainment of GHG emission reduction goals of AB 32.

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

No Impact. As discussed above, the GHG emissions generated by the proposed Project would not exceed the City's 2,500 MT of CO_2^e per year screening threshold. As the 2,500 MT of CO_2e per year threshold has been developed as part of the E-CAP development review process, the Project would not interfere with implementation of the E-CAP. Additionally, the Project's annual GHG emissions would also not exceed the County's 900 MT of CO_2e per year screening threshold. Consequently, the implementation of the proposed Project would not hinder the ability of the State to achieve AB 32's goal of achieving 1990 levels of GHG emissions by 2020. In addition, once the energy and water consumption reductions from compliance with the mandatory requirements of CALGreen are accounted for, the GHG emissions associated with the proposed Project would be even lower.

Consistency with CARB Scoping Plan: Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the Project would be Actions E-1 and GB-1. CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aims to reduce electricity demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The proposed Project would be required to include all mandatory green building measures for new residential developments under the CALGreen Code. Therefore, the proposed Project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

Consistency with City of Escondido Climate Action Plan: As discussed previously, the E-CAP serves as an implementation tool of the City General Plan to guide development in the City to meet the objectives of conserving resources and reducing GHG emissions. Following the State's adopted AB 32 GHG reduction target, the E-CAP sets a goal to reduce its GHG emissions back to 1990 levels by the year 2020. This target was calculated as a 15 percent decrease from 2005 levels, as recommended in the AB 32 Scoping Plan. In order to reduce its GHG emissions by 15 percent from 2005 levels by 2020, the City estimated the community-wide emissions for the year 2020, based on population and housing growth projections associated with the assumptions used in the City's General Plan Update, which was completed in 2012. Through this forecast, the City was able to determine the amount of GHG emissions that would need to be reduced in order for the City to reach its reduction target by 2020. Thus, because development of the proposed Project would be consistent with the residential land use designation for the project site identified in the City's General Plan Land Use and Community Form Element, the GHG emissions associated with the Project would have already been accounted for in the City's future emissions forecast. As such, implementation of the proposed Project would be consistent with the E-CAP. Additionally, because the GHG emissions generated by the proposed Project would not exceed the 2,500 MT of CO_2e per year threshold established in the E-CAP, the Project

would not hinder the City's ability to reduce its GHG emissions in accordance with AB 32 requirements. Therefore, implementation of the proposed Project would not adversely affect the statewide attainment of GHG emission reduction goals of AB 32.

Source(s): Air Quality and Greenhouse Gas Emissions Technical Report (ESA, 2014); Project Description.

VIII. Hazards and Hazardous Materials

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site, which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) 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?	☐	☐	☒	☐

VIII. Hazards and Hazardous Materials Discussion

The Phase I was prepared for the Development Site. No access to the Additional Annexation Area was provided, however, this area was observed from the street and by aerial imagery. The records search conducted for the analysis of existing hazards for the Development included the Additional Annexation Area. The results of the record search indicate that the Additional Annexation Area has a low probability for existing hazards. While a site reconnaissance was not conducted on the Additional Annexation Area, given the vacant nature of this area, there is little opportunity for the presence of significant hazardous material to be stored in the Additional Annexation Area. Therefore, the discussion and conclusions in this section pertain to the Project as a whole.

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. A Phase I Environmental Site Assessment was prepared by Petra (November 22, 2013) to analyze the Development's potential impacts to Hazards and Hazardous Materials (Appendix F). The proposed Project would include the development of 13 single-family homes and includes neither industrial elements nor association with the storage, handling, or transportation of hazardous materials. With the exception of occasional refueling during the Project construction phases only, no hazardous materials would be onsite. All construction related refueling will be conducted in accordance with BMPs and take place in a designated, protected area of the Development Site and of the Additional Annexation Area. The improved off-site intersections would not result in increased use of the roadways by trucks carrying hazardous materials.

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. The proposed Project would include the development of 13 single-family homes in the Development Area and 5 homes on the Additional Annexation Area and upon Project completion no significant hazards or releases of hazardous materials would be expected of this land use. The Development, and developments completed on the Additional Annexation Area, would have the potential of accidental fuel and/or chemical spills during the grading and construction phases. The contractor would be required to implement BMPs to reduce impacts of a potential spill, such as implementing a Spill Prevention, Control, and Countermeasures (SPCC) Plan and maintaining at the job site the applicable equipment and material designated in the SPCC Plan. With these BMPs, potential impacts would be less than significant.

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?***

Less than Significant Impact. The Development Site and Additional Annexation Area are located within one-quarter mile of Rincon Middle School. According to the hazardous materials report, Phase I Environmental Site Assessment (Petra, 2013), because the Development Site has a historical land use of agriculture, there is a potential that pesticides and herbicides persistent in the environment were applied and residual concentrations may remain in soil and drainages on the site. According to County of San Diego guidelines, soils contaminated with pesticides and herbicides associated with historic agricultural use are not regulated as hazardous materials unless those materials are planned for offsite export (2007). Because no grading materials are currently planned for export, the potential for exposure of residual concentrations of pesticides and herbicides to the nearby Rincon Middle School is less than significant. In addition, BMPs will be utilized and current regulations will be followed for the handling and processing of hazardous materials should they be found on site during demolition or construction. The removal of trash and debris will also be observed in accordance with current regulations.

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

No Impact. The Project Area is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

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 Project Area is not located within an airport land use plan and is located outside the sphere of influence for the McClellan-Palomar Airport, which is the nearest public airport.

f) ***For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?***

No Impact. The Project Area is not located within the vicinity of a private airstrip. The nearest private airstrip is located approximately 4.65 miles to the northeast at Lake Wohlford Resort.

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

No Impact. The Project Area has access to and would neither alter nor impede existing evacuation routes shown in the General Plan Figure VI-1. Implementation of the emergency response plan includes such precautions as avoiding construction in high-risk areas, proper landscaping in fire prone areas, and designing development to withstand earthquakes and flooding.

h) ***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?***

Less Than Significant Impact. The Project Area is not located in a wildlands area and is not adjacent to a wildlands area with a Very High Fire Hazard Zone Rating. The nearest wildlands area is approximately 0.25 mile to the east.

Source(s): City of Escondido General Plan (City of Escondido, 2013); County of San Diego Guidelines for Determining Significance, Hazardous Materials and Existing Contamination (County of San Diego, 2007); Geotracker (California State Water Resources Control Board, 2013); Field Investigation; Phase I Environmental Site Assessment (Petra, 2013); Project Description

IX. Hydrology and Water Quality

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate or conflict with any adopted water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a watercourse or wetland, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) 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?	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on Federal Flood Hazard boundary of Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place structures or fill within a 100-year flood hazard area, which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

IX. Hydrology and Water Quality Discussion

A Water Quality Technical Report (WQTR) was prepared by BHA (November 1, 2013) and a hydraulic analysis was prepared by Tory R. Walker Engineering, Inc. (2014) to analyze the Development's potential impacts to Hydrology and Water Quality (Appendix J). Groundwater was not found onsite. The predominant soil type existing on-site is Type B, which provides an opportunity for infiltration of storm water runoff into the native soils. The runoff from the properties to the north is collected along Stanley

Avenue and carried past the Project Area in rural side-road ditches. The adjacent parcel to the southwest has an approved Tentative Map with the City of Escondido, TM 889, which is shown on the Water Quality Report Exhibit for this Development. To the northwest, future construction on Tract No. SUB 13-003 would prevent any future off-site discharge from that development from crossing into the Development Site. The Development Site is currently 11 percent impervious surface and 50 percent impervious post-development. All 4.2 acres are to be disturbed.

In the post-Project condition, the Development Site entrance along Stanley Avenue will collect a small amount of surface runoff from Stanley Avenue, where a proposed road widening and sidewalk area will be constructed. A minor increase in impervious surface will be attributed to the street improvements. The downstream drainage infrastructure is capable of handling the additional runoff generated from the increased pavement from the roadway improvements (personal communication, Ryan Waufle, BHA Engineering). Pre- and post-construction conditions will remain the unchanged relative to treatment of roadway runoff.

Surface runoff generated by the Development will be captured on the street and conveyed to a pair of curb inlets, one on each side of the proposed street, before flowing into the cul-de-sac. These curb inlets will be connected via parallel storm drains to another pair of curb inlets at the back of the cul-de-sac, which will drain to a bioretention basin located in the back of the Development. The basin will provide treatment and detention of the storm water per City of Escondido Standard Urban Storm Water Mitigation Plan (SUSMP) requirements, and will outlet to an existing 66-inch storm drain below Lehner Avenue. Adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows..

Regarding the volume and velocity (Q) of surface runoff, the additional runoff volume generated from developing the site will be released to the existing outlet at a flow rate below the 10% Q_2 lower threshold. Additionally, the project will also not increase peak flow rates between the Q_2 and the Q_{10}, and therefore be below levels of significance and consistent with the SUSMP (BHA, 2013). The table below shows existing Q flows, post-project Q flows and the anticipated change in Q flows in cubic feet per second (cfs). The anticipated change shows a reduction in cfs.

TABLE 6: SURFACE RUNOFF VELOCITY EXISTING AND POST-DEVELOPMENT

Return Period (Frequency)	Existing Condition (cfs)	Post-Development Condition (cfs)	Change (cfs)
2-year	1.510	0.710	(0.800)
3-year	1.946	1.031	(0.914)
4-year	2.116	1.313	(0.803)
5-year	2.274	1.617	(0.657)
6-year	2.425	1.674	(0.751)
7-year	2.500	1.800	(0.700)
8-year	2.521	1.990	(0.531)
9-year	2.602	2.171	(0.431)
10-year	2.757	2.294	(0.463)

Surface runoff generated on the Additional Annexation Area currently flows to Lehner Avenue and Vista Way and is carried to the existing 66-inch storm water drain. Proposed mitigation for potential impacts to storm water facilities includes that adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows.. In the post-Project condition, the downstream drainage infrastructure is capable of handling the additional runoff generated from the increased pavement from the roadway improvements (personal communication, Ryan Waufle, BHA Engineering). Pre- and post-construction conditions will remain unchanged relative to treatment of roadway runoff. On-site water quality treatment basin(s) will be required to treat and detain the storm water generated for future development on the Additional Annexation Area per the City's SUSMP and HMP requirements.

a) *Would the Project violate or conflict with any adopted water quality standards or waste discharge requirements?*

Less than Significant with Mitigation. The construction of the Development and the future development of the Additional Annexation Area would be required to comply with the San Diego Municipal Storm Water Permit (Order No. 2001-01, NPDES), and with the project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will be developed to minimize erosion and will identify specific pollution prevention measures that will eliminate or control potential point and nonpoint pollution sources on-site during the Project's construction phase. The SWPPP shall meet the requirements of the NPDES and will identify potential pollutant sources associated with construction activities, identify non-storm water discharges, develop a water quality monitoring and sampling plan, and identify, implement, and maintain BMPs to reduce or eliminate pollutants associated with the construction site.

Based on the City of Escondido SUSMP and Hydromodification Plan (HMP), the developments associated with the Project have been determined to be Priority Development Projects and subject to hydromodification controls. The WQTR (Appendix J) identifies the bioretention basin as the post-construction BMP to address water quality impacts for the Development. Water quality treatment basin(s) will be designed and sized to accommodate the future development on the Additional Annexation Area. The bioretention system is essentially a surface and sub-surface water filtration system that incorporates both plants and underlying filter soils for removal of contaminants. The bioretention system is effective in removing sediments and attached pollutants and in delaying runoff peaks by providing retention capacity and reducing flow velocities. The WQTR also provides specific design and maintenance information for the bioretention system for the Development, and a corresponding document would be prepared for the future projects on the Additional Annexation Area.

Minor intersection improvements would result in widening of the road to include dedicated turn lanes (TIA, Appendix G). The Project would thus incrementally increase the amount of surface runoff as a result of additional pavement; however the existing road drainage facilities are adequate to provide conveyance of increased storm water flows (personal communications, Ryan Waufle, BHA Engineering). In addition, the Development will contribute to new off-site drainage improvements through payment of a Community Benefit Fee/Infrastructure Deficiency

Fee. Because the City will require a development agreement for the future development on the Additional Annexation Area, the Community Benefit Fee/Infrastructure Deficiency Fee will be assessed at the time of development. In addition, to address potential impacts to drainage facilities, adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows. This requirement may be reduced based on further refinement to the hydrology analysis.

With the implementation of the proposed improvements, potential impacts from the Project would be less than significant.

b) ***Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

No Impact. The Project would not deplete groundwater supplies and would not interfere with groundwater recharge by building additional wells or by altering a stream, wetland, or existing groundwater recharge facility because these resources/facilities are not found within the Project Area.

c) ***Substantially alter the existing drainage pattern of the site or area, including through the alteration of a watercourse or wetland, in a manner which would result in substantial erosion or siltation on- or off-site?***

Less Than Significant Impact. No watercourse or wetland is present on the site or off-site near the Project Area. The proposed Development would not alter the existing drainage pattern of the site however the surface sheet flow would be collected in the bioretention basin. The moderate slope of the site helps provide natural drainage of the site without additional grading. In addition, the bioretention basin to be constructed and maintained on the south end of the site would ensure no substantial erosion or siltation would occur and would bring potential impacts below significance. Water quality treatment basins will be designed and sized to accommodate the future development on the Additional Annexation Area, as required by the SUSMP and HMP, which would bring potential water quality impacts from the future development below significance.

d) ***Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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. The conversion of approximately half of the site to impervious surface would result in a greater volume of surface flow. Based on the WQTR, the Development has been designed to collect and treat the runoff generated by the Development and would avoid on-and off-site flooding while maintaining acceptable velocities of storm water flows leaving the site (Appendix J). A bioretention basin would be constructed and maintained on the

south end of the site to treat and retain runoff before it is discharged into the storm water system in Lehner Avenue. As described in the Project's Development Agreement, the City has noted current capacity for these anticipated flows and flood control is adequate. In addition, the Project will also contribute to off-site drainage improvements through payment of a Community Benefit Fee/ Infrastructure Deficiency Fee, which is also identified in the Project's Development Agreement. Based on Development design, existing capacity, and the Project's contribution to off-site drainage improvements, potential impacts would be reduced to less than significant. It is expected that the proposed annexation parcels will be similarly conditioned by the City and will be required to construct development-specific bioretention facilities as well as contribute to a community improvement fee.

e) *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 with Mitigation. The Project would be expected to incrementally increase the amount of surface runoff as a result of additional paved and hardscape surfaces of the residential developments. The Development and the future development on the Additional Annexation Area would be required to comply with National Pollution Discharge Elimination System (NPDES) standards. Consequently, runoff from the Project would not be considered significant and the Project would not materially degrade the existing drainage facilities or degrade water quality. In addition, Drainage Facilities Fees would be paid consistent with City required Development Fees to contribute funding for adequate infrastructure to manage storm water runoff and pollution. The downstream drainage infrastructure is capable of handling the additional runoff generated from the increased pavement from the roadway improvements (personal communication, Ryan Waufle, BHA Engineering). Pre- and post-construction conditions will remain the unchanged relative to treatment of roadway runoff. It is expected that the future development on the Additional Annexation Area will be similarly conditioned by the City of Escondido and will be required to comply with the NPDES standards as well as contribute to a drainage facility fee.

In addition, to address potential impacts to drainage facilities, adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows. This requirement may be reduced based on further refinement to the hydrology analysis.

With the implementation of the proposed improvements, potential impacts from the Project would be less than significant.

f) *Otherwise substantially degrade water quality?*

No Impact. See answer IX.e above.

g) *Would the Project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

No Impact. According to Figure VI-7, 100 Year Flood Hazard Zones of the General Plan, the Project Area is not located within a FEMA 100 Year Floodway or a 100 Year Floodplain.

h) ***Would the Project place structures or fill within a 100-year flood hazard area, which would impede or redirect flood flows?***

No Impact. According to Figure VI-7, 100 Year Flood Hazard Zones of the General Plan, the Project Area is not located within a FEMA 100 Year Floodway or a 100 Year Floodplain. No flows would be impeded or redirected.

i) ***Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?***

No Impact. The Project Area is not located in an inundation zone according to Figure VI-8 Dam Failure Inundation Areas.

j) ***Inundation by seiche, tsunami, or mudflow?***

No Impact. The Project Area is not located in an inundation zone according to Figure VI-8 Dam Failure Inundation Areas. The Project Area is also located over 14 miles away from the Pacific Ocean and out of range for risk of tsunami. No bodies of water or waterflows are located near the site that would create exposure to risk of seiche or mudflow.

Source(s): City of Escondido General Plan (City of Escondido, 2013); Field Investigation; Water Quality Technical Report (BHA, Inc. 2013); Project Description

Hydrology and Water Quality Resources Avoidance, Minimization, and Mitigation. The following mitigation measure would be implemented to minimize potential impacts:

HYD-1a: Adequate drainage improvements shall be installed within the Lehner Avenue right-of-way to the satisfaction of the Engineering Department based on the City's adopted Drainage Master Plan, or subsequent updated technical analyses approved by the City to accommodate storm water flows.

X. Land Use Planning

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐

X. Land Use Planning Discussion

a) *Would the Project physically divide an established community?*

No Impact. The Project proposes the development of 13 single-family residences within an established community and the annexation of approximately 1.85 acres (approximately 1.53 acres of offsite private property and 0.32 acre of public roadway) currently within the City's Sphere of Influence (SOI) but still within the County of San Diego jurisdiction. In addition to the 13-unit Development, an additional 5 residences are allowed on the Additional Annexation Area. The change in zoning as a result of the annexation will not physically divide the community, as the annexation will result in increased community structure by placing the annexed area inside City limits, a defined community. The proposed annexation would incrementally implement the City and County's long-range goal to annex identified County lands within the City's SOI. Table 7 shows the City and County's zoning and land use designations for the combined Project area.

TABLE 7: EXISTING ZONING AND LAND USE DESIGNATIONS FOR PROJECT AREAS

	City (pre-zone)	County
Zoning	R2 R-1-10 (light multiple residential, 1 unit per 10,000 square feet).	Semi-Rural Residential of 1 dwelling unit per 1 gross acre, slope less than 25%.
General Plan Designation	Residential – Suburban (3.33 units/acre).	SR-1 (1 DU/1, 2, 4 ac) – Agriculture. One unit per acre allowed density.

b) *Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact. The City of Escondido General Plan is the applicable land use plan for the Project Area. The Suburban land use designation of the General allows a maximum density of 3.3 dwelling units per acre with a minimum lot size of 10,000 square feet (sf). The Development's TTM (Appendix A, Figure 3) shows all lots larger than 10,000 sf, and therefore the Development is consistent with the lot size requirement.

The Development also proposes to construct such other improvements required by the Conditions of Approval and the Development Agreement. The terms of the Development Agreement would allow the developer to proceed with construction of 13 residences in return for the construction of public improvements and the payment of funds (deficiency fees) for upgrades to existing water, street and drainage infrastructure in the North Broadway area. As described in the Development Agreement, compensation for these upgrades includes payment of a Community Benefit Fee of $12,500 per unit, and a fair share contribution to the future signalization of the Ash Street/Vista Avenue intersection. Improvements include construction of dedicated turn lanes and transitions at the Ash Street/Lehner Avenue and Ash Street/Vista Avenue intersections. The Development Agreement would ensure consistency with the City's Growth Management Ordinance requirements for new residential development within the North Broadway Region of influence; therefore, Development impacts to applicable land use plans, policies and regulations would be less than significant. A proposed development of the 5 homes on the Additional Annexation Area would also require a Development Agreement that would require consistency with the Growth Management Ordinance and therefore, Annexation impacts to applicable land use plans, policies and regulations would be less than significant.

c) *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

Less Than Significant Impact. As described in Section IV(f), this Project is not in conflict with the applicable habitat conservation plan.

Source(s): City of Escondido General Plan (City of Escondido, 2013); City of Escondido Planning Commission (City of Escondido, 2006); Field Investigation; Multiple Habitat Conservation Program (SANBAG, 2003); Project Description

XI. Mineral Resources				
Would the Project:				
	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

XI. Mineral Resources Discussion

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

No Impact. No existing or past mineral extraction facilities are located in the Project Area (Figure 4.11-1 of the General Plan Update Environmental Impact Report). Historically, the Project Area has been used for agricultural and residential use and was not associated with mineral mining or excavation. No evidence of mineral resources was identified in the geotechnical report prepared for this Project.

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

No Impact. See answer XI.a above.

Source(s): City of Escondido General Plan (City of Escondido, 2013); Field Investigation; Project Description

XII. Noise				
Would the Project:				
	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☒	☐	☐
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 expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

XII. Noise Discussion

A Noise Technical Report (NTR) was prepared by ESA (April 2014) to analyze the Development's potential impacts on noise based on City and County standards (Appendix H). Development design revisions occurring after production of the report have proposed a reduced density to allow for a 13-unit Development rather than a 14-unit Development. Therefore, the following analysis is based on development of the originally proposed 14 units, and thus, presents a more robust analysis of the Development's potential impacts than are anticipated under currently proposed conditions. The NTR's analysis prepared for the Development Site also can be used to evaluate the potential noise impacts for the Additional Annexation Area. Given the proximity of the Additional Annexation Area to the Development, it is reasonable to extrapolate the data to address impacts to this area in addition to the Development. Therefore, the discussion and conclusions in this section pertain to the Project as a whole.

The Development's potential construction-related and operational-related noise impacts were evaluated based on City standards for exterior sound levels and per the City's General Plan and Noise Policy 5.3 of the Community Protection Element; and per County significance standards. The City and County significance criteria thresholds are shown in Table 8 below.

TABLE 8: CITY AND COUNTY EXTERIOR SOUND LEVEL LIMITS

CITY THRESHOLDS		
Zone	**Time**	**Applicable Limit One-hour Average Sound Level (A-weighted Decibels)**
Residential zones	7:00 A.M. to 10:00 P.M.	50
	10:00 P.M. to 7:00 A.M.	45
COUNTY THRESHOLDS		
Zone	**Time**	**One-hour Average Sound Level Limits (dBA)**
(1) R-S, R-D, R-R, R-MH, A-70, A-72, S-80, S-81, S-87, S-90, S-92, and R-V and R-U with a density of less than 11 dwelling units per acre	7:00 A.M. to 10:00 P.M.	50
	10:00 P.M. to 7:00 A.M.	45

With regards to traffic noise, the significance of the proposed Development's noise impacts were determined by comparing estimated Development-related noise levels to existing no-Development noise levels. The traffic noise significance criteria thresholds are shown in Table 9 below.

TABLE 9: EXTERIOR INCREMENTAL ENVIRONMENTAL NOISE IMPACT STANDARDS FOR NOISE-SENSITIVE USES (DB)

Residences and Buildings Where People Normally Sleep[a]		**Institutional Land Uses with Primarily Daytime and Evening Uses[b]**	
Existing L_{dn}	**Allowable Noise Increment**	**Existing Peak Hour L_{eq}**	**Allowable Noise Increment**
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

Note: Noise levels are measured at the property line of the noise-sensitive use.

a This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

b This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

a) *Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less than Significant Impact with Mitigation.

Operation Noise: The Development will not involve the use of heavy machinery or generate heavy-duty truck trips that are often associated with large commercial or industrial uses. As such, no sources of "excessive" noise levels will occur during Development operations that will violate established noise standards (ESA, Noise Technical Report, 2013, Appendix H).

The Project will add additional vehicles on surrounding roadways and therefore potentially impact ambient noise levels with increased traffic noise. The proposed Project will increase local noise levels by a maximum of 0.8 dB L_{dn} at the roadway segment of Stanley Avenue, east of N. Ash Street. As this noise increase will not exceed the City's allowable noise increment, this impact will be less than significant. In addition, as the other roadway segments that are located even farther away from the Project Area will experience less traffic increases due to the Development, the increase in local noise levels at these roadway segments will also not exceed the County's allowable noise increments, and impacts will be less than significant.

Cumulative mobile source noise impacts will occur primarily as a result of increased traffic on local roadways due to the proposed Development and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Development to the future cumulative base traffic volumes on the roadway segments in the Development vicinity. The Development's maximum contribution to cumulative traffic noise levels will be 0.6 dB L_{dn} at the segment of Vista Avenue, west of N. Ash Street. As the increase in roadway noise at this roadway segment will not exceed the allowable incremental noise increase of 3.0 dB L_{dn}, the noise increase associated with the Development will not be substantial based on the City's noise standards for allowable incremental noise increases[2]. Aside from this roadway segment, all of the remaining roadways in the Project Area will not be exposed to incremental noise increases from the Development that will exceed the City's noise standards for allowable incremental noise increases. Therefore, the Development's contribution to cumulative traffic noise impacts will be less than significant (ESA, Noise Technical Report, 2014).

Furthermore, the Development's maximum contribution to cumulative peak hour traffic noise levels will be 0.1 dB Leq at the segment of N. Broadway, south of Stanley Avenue. As this noise increase will not exceed the allowable incremental noise increase of 3.0 dB Leq, the noise

[2] Because the project site is anticipated to be annexed into the City prior to development of the project, the applicable noise criteria from the City, instead of the County, is used for this analysis. Since the City's allowable noise increase criteria is more stringent than the County's criteria, even under a scenario where the project site is not annexed by the City prior to development of the Project, the use of the City's criteria in this report provides an analysis that is more conservative in nature.

increase will not be substantial. The noise increase due to future development of 5 houses in the Additional Annexation Area, therefore, will also be less than significant. As the remaining roadways analyzed will not be exposed to any noise level increases attributable to the Development, the peak hour noise increases at these roadway segments will also not be substantial. Therefore, the Project's contribution to cumulative peak hour traffic noise impacts at institutional land uses will be less than significant (ESA, Noise Technical Report, 2014).

The Project's Additional Annexation Area will potentially add an additional 5 units (50 additional vehicle trips per day) on three parcels south of Lehner Avenue resulting from the zone change and increased allowable density. The Traffic Impact Analysis' (TIA) technical consultant provided consultation regarding potential impacts resulting from the Project's annexation and determined that an additional 5 units will contribute to less than the day to day fluctuations of traffic in the study area (LLG, 2014). In other words, quantifying the potential impacts of the 5 additional units neither increases the study's accuracy beyond the margin of error nor leads the study to different conclusions. Therefore, impacts associated with the Additional Annexation Area are considered less than significant with regard to traffic. Correspondingly, impacts to noise from the 5 units, which are analyzed based on traffic generation rates and findings made in the TIA, will also have a less than significant impact per City and County standards.

Construction Noise: Construction of the proposed Project will require the use of heavy equipment during the demolition, grading and excavation activities at the Project Area, installation of new utilities, paving, and building fabrication for the proposed residential buildings. Development activities will also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there will be a different mix of equipment. As such, construction activity noise levels at and near the Project Area will fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Table 10 shows the hourly noise levels (L_{max}) produced by various types of construction equipment based on a distance of 50 feet between the equipment and noise receptor for the Development. It should be noted that L_{max} noise levels associated with the construction equipment will only be generated when the equipment are operated at full power. Typically, the operating cycle for a piece of construction equipment will involve one or two minutes of full power operation followed by three or four minutes at lower power settings. As such, the L_{max} noise levels shown in Table 10 will only occur occasionally throughout the construction day.

During construction, two basic types of activities will be expected to occur and generate noise at the Development. One of these activities will involve demolition, grading and excavation at the Development to accommodate the foundation for the proposed residential uses. The second type of construction activity that will generate noise will involve the physical construction of the proposed residential structures. Overall, construction of the Development is anticipated to occur over an approximately 6-month period.

TABLE 10: MAXIMUM NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level at 50 Feet (dB, L_{max})
Dump Truck	76
Excavator	81
Air Compressor	78
Backhoe	78
Grader	85
Front End Loader	79
Dozer	82
Tractor	84
Paver	77
Roller	80

SOURCE: Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006.

During construction of the Project, the nearest and most notable offsite sensitive receptors to the Project Area will be the surrounding residential uses and the Rincon Middle School. The Additional Annexation Area and the Development are approximately equidistant from these receptors and the noise analysis for the Development is appropriate for the future development on the Additional Annexation Area. Due to the use of construction equipment during the construction phases, the Project will expose these surrounding off-site sensitive receptors to increased exterior noise levels. According to Section 36.409 of the County's Noise Abatement and Noise Control Ordinance, with the exception of emergency work the County has deemed it unlawful for any person to operate construction equipment, or cause construction equipment to be operated, that exceeds an average sound level of 75 dB for an eight-hour period, between 7:00 A.M. and 7:00 P.M., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. In addition, with respect to the City's construction noise regulations, Section 17-234 of the City Municipal Code stipulates that construction equipment or a combination of equipment are not allowed to operate so as to cause noise in excess of a one-hour average sound level limit of 75 dB at any time, unless a variance has been obtained in advance from the City Manager.

During Project construction, the noise levels experienced at the nearest off-site receptors will vary depending on the distance of the construction equipment within the site to the receptor. For instance, the construction noise levels experienced at the off-site receptors to the north will be the greatest when construction equipment are operating in the northern portion of the Project Area, while noise levels at these receptors will be the lowest when construction equipment are operating in the southern portion of the Project Area. Thus, the noise levels will fluctuate over the course of a construction day as equipment moves back and forth across the Project Area. In addition, the construction of the Additional Annexation Area will occur at a different time from the Development which will result in reduced noise generation from construction. Because the Development's specific construction equipment roster and schedule have not been finalized at this time, an approximate estimate of construction noise levels is conducted for the purpose of this analysis using the general assessment approach

recommended by the Federal Transit Administration (FTA). Table 11 shows the estimated construction noise levels that will occur at the nearest off-site sensitive uses during construction at the Project Area. The estimated noise levels at the off-site sensitive receptors were calculated using the Federal Highway Administration (FHWA)'s Roadway Construction Noise Model (RCNM), and were based on the concurrent operation of the two noisiest pieces of equipment (i.e., grader and tractor) at the center of the Development.

TABLE 11: EXTERIOR NOISE AT OFF-SITE SENSITIVE USES FROM Development CONSTRUCTION*

Off-site Sensitive Land Uses	Location	Approximate Distance to Project Site Boundary (ft.)[a]	Estimated Hourly Noise Levels (dB L_{eq})[b]	Applicable Hourly Noise Standard (dB L_{eq})
Residences	North of the Project Area, across Stanley Ave.	400	66	75
Residence	Directly east of the Project Area	145	74	75
Rincon Middle School	South of the Project Area, across Lehner Ave.	567	63	75
Residence	South of the Project Area, across Lehner Avenue	590	62	75
Residence	Southwest of the Project Area	450	65	75
Residences	West of the Project Area	433	65	75

* Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units.

a The approximate distances are measured from the center of the Project Area to the nearest sensitive-receptor property line.

b In accordance with the general construction noise assessment approach recommended by the FTA, it is assumed that the two noisiest pieces of construction equipment used at the Project Area (i.e., grader and tractor) would be operating concurrently.

As shown in Table 11, the estimated construction noise levels generated by the Development will range from 62 dB Leq at the nearest residential use property line located south of the Project Area, across Lehner Avenue, to 74 dB L_{eq} at the nearest residential use located east of the Project Area. Overall, none of the identified nearest off-site sensitive receptors will be exposed to noise levels that exceed 75 dB L_{eq}. Thus, under the scenario where the construction noise levels shown in Table 11 at the off-site sensitive receptors will occur for a full hour, the City's 1-hour average noise standard of 75 dB for construction activities will not be exceeded. Furthermore, since the 1-hour average construction noise levels will not exceed 75 dB, then an 8-hour average of those noise levels (i.e., County construction noise standard) will also not exceed 75 dB. Therefore, the Development's construction activities will not violate the construction noise standards of the County's Noise Abatement and Control Ordinance or the City's municipal code.

Despite not exceeding the County's or the City's construction noise standards, when the Development's estimated construction noise levels are compared with the ambient daytime noise levels that were measured at the nearby off-site sensitive uses to the Project Area, the exterior noise levels at these off-site sensitive receptors will experience an increase in noise levels during construction of the Development. It should be noted, however, that the construction-related noise levels associated with development under the Development will be

temporary in nature, and will not generate continuously high noise levels, although occasional single-event disturbances from grading and construction are possible. In addition, construction equipment engines will also likely be intermittently turned on and off over the course of a construction day. Although construction noise levels will only be temporary in nature, measures MM N-1 through MM N-7, which will require the implementation of noise reduction devices and techniques during project construction, are included to reduce the construction-related noise levels at nearby receptors to the maximum extent feasible. With the implementation of MM N-1 through MM N-7, the temporary construction noise impacts will be minimized and impacts will be less than significant.

b) ***Would the Project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?***

Less than Significant Impact.

Operation Noise: The Project will not involve the use of heavy machinery or generate heavy-duty truck trips that are often associated with large commercial or industrial uses. As such, no sources of "excessive" groundborne vibration or noise levels will occur during Project operations (ESA, Noise Technical Report, 2013).

Construction Noise: Construction activities that will occur within the Project Area will include grading and excavation, which will have the potential to generate low levels of groundborne vibration. As such, the existing residential uses located in the immediate vicinity of the Project Area could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site. No pile-driving activities will be required for construction of the proposed Development.

The various peak particle velocity (PPV) and root mean square (RMS) velocity in Decibel (VdB) levels for the types of construction equipment that will operate during the construction of the proposed Development are identified in Table 12. Based on the information presented in Table 12, vibration velocities could reach as high as approximately 0.089 inch-per-second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity.

TABLE 12: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT*

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

* Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units.

SOURCE: FTA, 2006.

Construction activities associated with the proposed Development will have the potential to impact the nearest surrounding off-site sensitive receptors to the Project Area, which include the surrounding residential uses to the north, east, and west, and the Rincon Middle School located to the south. Table 13 shows the construction-related groundborne vibration levels that will occur at the identified off-site sensitive uses during construction at the Project Area.

TABLE 13: GROUNDBORNE VIBRATION LEVELS AT OFF-SITE SENSITIVE USES*

Off-site Sensitive Land Use	Approximate Distance to Project Area (ft.)[a]	Estimated PPV (in/sec)
Residences located north of the Project Area, across Stanley Ave.	110	0.001
Residence located directly east of the Project Area	183	0.004
Rincon Middle School located southeast of the Project Area, across Lehner Ave.	360	0.002
Residence located south of the Project Area, across Lehner Avenue	356	0.002
Residence located southwest of the Project Area, across Lehner Avenue	240	0.003
Residences located west of the Project Area, across N. Ash Street	324	0.002

ft. = feet
in/sec = inches per second

* Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units.

[a] The approximate distances are measured from the nearest Development boundary to the nearest off-site structure. In the case of the residences to the immediate east and west of the Development, a 15-foot and 12-foot distance between the Development boundary and these sensitive receptor structures, respectively, is used based on the preliminary site plan for the proposed Project.

As shown in Table 13, the vibration velocities forecasted to occur at the off-site sensitive receptors could potentially range from 0.002 in/sec PPV at the Rincon Middle School and the off-site residence located south of the Project Area, across Lehner Avenue, to 0.01 in/sec PPV at

the residences located north of the Project Area, across Stanley Avenue. None of the buildings at the identified off-site sensitive use locations are considered to be fragile structures that are extremely susceptible to vibration damage. For the purpose of this analysis, the identified off-site residential structures surrounding the Project Area are considered to be "older residential structures," while the Rincon Middle School structures are considered to be "modern industrial/commercial buildings," based on the structure descriptions provided under Caltrans vibration criteria. With respect to the vibration sources associated with project construction, it is not anticipated that any continuous/frequent intermittent sources of vibration will occur as no pile-driving or compaction activities will be required at the Project Area. As such, only transient sources of vibration are anticipated to be generated at the Project Area during construction. Based on the information shown in Table 13, none of the existing off-site residential structures will be exposed to PPV groundborne vibration levels that exceed the 0.5 inches per second criteria for transient sources. In addition, the Rincon Middle School will not be exposed to PPV groundborne vibration levels that exceed the 2.0 inches per second criteria for transient sources. Furthermore, the highest vibration level of 0.01 in/sec PPV at the residences located north of the Development Site will be barely perceptible with respect to Caltrans vibration annoyance potential criteria. As such, groundborne vibration impacts at off-site sensitive receptors during project construction with respect to building damage and human annoyance will be less than significant (ESA, Noise Technical Report, 2014).

c) ***Would the Project result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?***

Less Than Significant Impact.

Construction Noise: According to the NTR for the project (ESA, 2013, Appendix H), a temporary increase in ambient noise levels will occur during the demolition, grading and construction project phases. Temporary increase in ambient noise levels will also occur in the Additional Annexation Area during construction in this area. The potential impacts for temporary demolition, grading and construction activities are discussed in answers XII.a and XII.b above.

Operation Noise: Potential permanent impacts during the Project's operation phase will be associated with heating, ventilating, and air conditioning (HVAC) units and exhaust fans that may be installed on the proposed single-family residential units; and associated with an increase in traffic and traffic related noise.

HVAC units and exhaust fans may be installed on the proposed single-family residential units in the Project Area. Due to their proximity, the noise levels generated by the new HVAC units and exhaust fans for the proposed Project could potentially disturb the existing residential uses to the north and east of the Project Area. However, it should be noted that as an industry practice, the design of the onsite HVAC units and other noise-generating mechanical equipment associated with the new residential units at the Project Area will typically be equipped with noise muffling devices or shielding (e.g., enclosures) to reduce noise levels that may affect nearby noise-sensitive uses. In addition, for the proposed Development, all HVAC units will be located in either the rear or side of the new residences where they will be shielded from neighboring uses by blocked walls. Furthermore, the HVAC units for the Development installed

will be typical of those used at other existing residences in the Project vicinity, and generally will not represent a substantial source of noise. It is expected that the future residences in the Additional Annexation Area will also install typical HVAC unit. Thus, impacts from HVAC-related noise levels associated with the proposed Project will be less than significant.

Furthermore, in order to ensure that onsite operational noise will not adversely affect the future residents at the Project Area, measure MM N-8 will be implemented to ensure that all exterior windows associated with the proposed residential uses will be constructed such that sufficient sound insulation is provided to ensure that interior noise levels will be below a L_{dn} or CNEL of 45 dB in any residential unit.

Potential impacts to ambient noise levels associated with traffic noise are discussed in Section X.II.a above.

d) ***Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?***

Less than Significant Impact with Mitigation. A temporary increase in ambient noise levels will occur during the grading and construction project phases. The potential impacts for temporary grading and construction activities are discussed in answers XII.a and XII.b above. Implementation of MM N-1 through MM N-7 described below will reduce the potential impacts to a level below significance.

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 expose people residing or working in the Project area to excessive noise levels?***

No Impact. The Project Area is not located within an airport land use plan and is located outside the sphere of influence for the McClellan-Palomar Airport, which is the nearest public airport. The site is not located within the vicinity of a private airstrip. The nearest private airstrip is located approximately 4.6 miles to the northeast at Lake Wohlford Resort.

f) ***For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?***

No Impact. See answer XII.e above.

Source(s): City of Escondido General Plan (City of Escondido, 2013); Field Investigation; Noise Technical Report (ESA, 2014)

Noise Avoidance, Minimization, and Mitigation. The following mitigation measures will be implemented to minimize potential impacts from the Development and future construction on the Additional Annexation Area:

MM N-1: The Project Applicant and/or contractor shall ensure that all construction equipment has properly operating mufflers.

MM N-2: Noise and groundborne vibration construction activities whose specific location on the Project Area may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses.

MM N-3: Construction activities associated with the proposed Project shall, to the extent feasible, be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. When the use of impact tools are necessary, they shall be hydraulically or electrically powered when feasible to minimize noise associated with compressed air exhaust from pneumatically powered tools.

MM N-4: The Applicant shall locate stationary construction noise sources away from adjacent receptors, to the extent feasible, and ensure that they are muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible.

MM N-5: If the Project is under the jurisdiction of the County at the time of development, the Applicant and/ or Contractor shall notify all construction workers prior to the commencement of construction that activities generating impulsive noise levels at the Project Area must be limited to no more than 15 minutes in a given hour when such activities are located adjacent to an off-site sensitive receptor (residence). Impulsive noise is defined by the County as a single noise event or a series of single noise events that causes a high peak noise level of short duration (one second or less) measured at a specific location (Section 36.410 of the County's Noise Abatement and Control Ordinance).

MM N-6: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Area. Signs shall also be posted at the Project Area that include permitted construction days and hours.

MM N-7: Construction activities shall be limited to permitted construction hours designated by the applicable jurisdiction for the project at the time of development. If the project is under the jurisdiction of the County at the time of development, construction activities shall be limited to between the hours of 7:00 A.M. and 7:00 P.M. from Monday through Saturday. Further, no construction activity shall be undertaken on Sundays and recognized County holidays (Section 36.408 of the County's Noise Abatement and Control Ordinance). If the project is under the jurisdiction of the City at the time of development, construction activities shall be limited to between the hours of 7:00 A.M. and 6:00 P.M. from Monday through Friday, and between the hours of 9:00 A.M. and 5:00 P.M. on Saturdays. Further, no construction activity shall be undertaken on Sundays and recognized City holidays (Section 17-234 of the City's Municipal Code).

MM N-8: Prior to the issuance of a certificate of occupancy, the Applicant shall ensure that all exterior windows associated with the proposed residential uses at the project site shall be constructed to provide a sufficient amount of sound insulation to ensure that interior noise levels will be below an L_{dn} or CNEL of 45 dB in any room.

XIII. Population and Housing				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

XIII. Population and Housing Discussion:

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)?*

Less Than Significant Impact. The Project would build 18 single-family residences which would incrementally increase the population in the immediate area (13 within the Development and 5 on the Additional Annexation Area). These additional units would support the City's Regional Share Housing Requirements and the General Plan Housing Policy 1.1 to expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City. While population growth is anticipated, it is consistent with City planning efforts and County expectations for de-annexation. According to the City's General Plan Housing Element, each household in the City has an average of 3.12 persons. By applying 3.12 persons per household to the additional 13 residences from the Development and the 5 residences in the Additional Annexation Area, the Project is anticipated to increase the population of the City by 56 persons. Compared to an estimated population in 2010 of 143,911 residents, the increase in population of 0.03% by the Project will not cause a significant population impact. Development of the Project will be supported by one additional road/cul-de-sac that will be constructed within the project site to provide the new units with access to and from existing Stanley Avenue. Off-site intersection improvements identified in the TIA (Appendix G) and required by the Development Agreement will be constructed. No other infrastructure is proposed aside from utility improvements on the property that would tie into existing offsite municipal infrastructure.

b) *Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

Less Than Significant Impact. The Project Area currently contains one single-family residence that would be demolished. The Project would construct 18 single-family units (13 within the Development and 5 on the Additional Annexation Area. Therefore, adequate replacement housing is part of the Project design and impacts would be less than significant. There are no housing units on the Additional Annexation Area.

c) *Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

No Impact. See answer XIII.b above.

Source(s): City of Escondido General Plan (City of Escondido, 2013); Field Investigation; Project Description

XIV. Public Services	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 following public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

XIV. Public Services Discussion:

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 government 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 following public services?***

i) ***Fire protection***

Less Than Significant Impact. The Project Area is within the Rincon Del Diablo Fire Protection District with services provided by the Escondido Fire Department. Fire Station #7 is the closest station, approximately 1.5 miles from the site and located at 1220 North Ash. The Project would incrementally increase the need for service in the area by adding 18 single-family residences. Consistent with the Citywide Facilities Plan, this increase would be offset by the payment of Public Facilities Fees paid at the time of building permit issuance. In addition, the Project would be subject to fire building plan fees and review to ensure the Project is in compliance with access and safety standards. Based on information provided by the City, upon request for service, one engine and two ambulances will respond from station #7 within the response time mandated by the General Plan.

ii) ***Police protection***

Less Than Significant Impact. The Project would incrementally increase the need for additional police service with the development of 18 residential units. Consistent with the Citywide

Facilities Plan, this incremental increase would be offset by the payment of Public Facilities Fees paid at the time of building permit issuance. Based on information provided by the City, the Escondido Police Department will provide services from the new police and fire headquarters building located at 1161 North Centre City Parkway. Therefore, no impacts to service level are anticipated to result from the proposed Development.

iii) *Schools*

Less Than Significant Impact. The site is within the Escondido Union School District and the Escondido Union High School District. The district maps show that students from the proposed Development would be scheduled to attend North Broadway Elementary School, Rincon Middle School and Escondido High School. The Citywide Facilities Plan notes that new development leading to higher enrollment is a concern of the school districts' ability to maintain adequate school facilities that can accommodate greater student populations. Payment of School Impact Fees pursuant to SB50 has been deemed to be adequate mitigation by the State Legislature to offset potentially significant impacts to educational facilities. In addition, as part of the initial study submittal requirements, the City of Escondido requires letters from the school districts indicating their ability to provide school facilities that can serve the Project. These letters are included in Appendix I.

iv) *Parks*

Less Than Significant Impact. The Project would not occur on or require the conversion of park space. The nearest parks within an approximate half-mile to one-mile radius that would service the Project include Jesmond Dene Park (35 acres), Reidy Creek Golf Course (65 acres), Rod McLeod Park (18 acres), El Norte Park (2.5 acres), and Daley Ranch (3,058 acres). The addition of 18 residential units would create an incremental increase in use of these existing park locations. According to the Citywide Facilities Plan, park services in Escondido are meeting threshold levels of service and the Project would not significantly impact park services. In addition, the Project would be required to pay a Park Fee upon issuance of building permits consistent with the growth management element of the General Plan and Quality of Life Goals.

v) *Other public facilities*

Less Than Significant Impact. Water and wastewater supply and utilities would be connected to existing City lines within the adjacent streets. The Project would create an incremental increase on water and wastewater facilities demand with the additional units. According to Article 47, Section 33-924 of the City Municipal Code and City Quality of Life Standards, the Project would be required to provide adequate sewer, water and drainage facilities for the area to the satisfaction of the City engineer and in accordance with adopted master plans. In addition, consistent with the Citywide Facilities Plan, Water Connection Fees and Wastewater Connection Fees would be paid to offset any potential impacts to these services upon issuance of building permits for this Project and the developments on the Additional Annexation Area. Public Facilities Fees paid at the time of building permit issuance would also contribute to and offset the incremental increase on the demand for Library Services, also discussed in the Citywide Facilities Plan.

Source(s): Citywide Facilities Plan (City of Escondido, 2009); City of Escondido General Plan (City of Escondido, 2013); Fee Guide for Development Projects (City of Escondido, 2013); Field Investigation; Project Description

XV. Recreation	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

XV. Recreation Discussion:

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

Less Than Significant Impact. The Project proposes the development of 18 single-family residences that would lead to an incremental increase on the use of public parks and recreational facilities. Impacts to these facilities would not be substantial and potential impacts would be offset by the payment of Park and Facilities Impact Fees paid upon issuance of building permits.

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 Project does not propose the development of recreational facilities and it does not require the construction or expansion of recreational facilities.

Source(s): Citywide Facilities Plan (City of Escondido, 2009); City of Escondido General Plan (City of Escondido, 2013); Fee Guide for Development Projects (City of Escondido, 2013); Field Investigation; Project Description

XVI. Transportation and Traffic

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with an adopted plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b) Conflict with an adopted congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the appropriate congestion management agency for designated roads or highways?	☐	☒	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, pedestrian facilities, or other alternate transportation or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

XVI. <u>Transportation and Traffic Discussion:</u>

A Traffic Impact Analysis (TIA) was performed by LLG Engineers (April 4, 2014) to analyze the potential impacts on existing and future Transportation and Traffic conditions in the Project Area from a 14-unit residential development. Design revisions occurring after April 4, 2014, have reduced the number of units to 13. Therefore, the following analysis based on the TIA presents a more robust analysis of the Development's potential impacts than actual proposed conditions. The study area includes the following five (5) existing intersections and five (5) street segments.

Intersections:

1. N. Broadway / Stanley Avenue
2. N. Ash Street / Stanley Avenue
3. N. Ash Street / Lehner Avenue
4. N. Broadway / Vista Avenue
5. N. Ash Street / Vista Avenue

Segments:

1. N. Ash Street: Between Stanley Avenue and Lehner Avenue
2. N. Ash Street: South of Vista Avenue
3. Stanley Avenue: East of N. Ash Street
4. Vista Avenue: Between N. Broadway and N. Ash Street
5. N. Broadway: South of Vista Avenue

The approach and methodology is based on guidance provided by the City of Escondido Engineering Staff, as follows:

1. The traffic study should include a SANDAG prepared Select Zone Assignment for the Development to determine the Development's traffic distribution.
2. The traffic study should utilize the Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002) published by SANDAG, to determine the Development traffic volume.
3. Traffic should utilize the following scenarios to determine Development traffic impacts at intersections and along roadway segments.
    a. Existing Condition (based on new traffic counts)
    b. Existing + Project Traffic Condition
    c. Existing + Cumulative Projects Traffic Condition
    d. Existing + Cumulative Projects + Project Traffic Condition

Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment or intersection under various traffic volume loads. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS is used to determine whether or not a project will have a significant impact on an existing roadway or intersection based on local and/or regional thresholds called significance criteria. Per City standards, thresholds of significance are not triggered at intersections or roadway segments that continue to operate at a level of LOS A, B or C after project implementation. Per County standards, thresholds of significance are not triggered at intersections or roadway segments that continue to operate at a level of LOS A, B, C or D after project implementation. Because the City thresholds are more restrictive than the County's, the City's thresholds will be used for this analysis

The Project study area includes locations that lay both within the City of Escondido and County of San Diego jurisdictions. The City thresholds regarding intersections are analyzed in Tables 15, 17, 19 and 20 below; City and County thresholds are different regarding roadway segments and are therefore analyzed under separate criteria in Tables 16 and 18 below (LLG, 2014). The following is a summary of the significance criteria from each jurisdiction that was utilized in the TIA. The table below summarizes the amount of traffic which can be added to a (LOS D/E/F location before a significant impact is calculated for the Project.

TABLE 14: PROPOSED THRESHOLDS TO IDENTIFY PROJECTS SIGNIFICANT TRAFFIC IMPACT (CITY OF ESCONDIDO)

Level of Service with Project	Allowable Change due to Project Impact		
	Roadway Segments		Intersections Delay (sec.)
	V/C	Speed (mph)	
D, E, or F	0.02	1	2

*No Significant Impact occurs at areas in GP Downtown Specific Area that operates on LOS "D" or better.

*Mitigation measures should also be considered for any segment or intersection operating on LOS "F" subject to less than significant impact.

*V: Volume *C: Capacity (use LOS "E")

In addition to the City significance criteria thresholds shown in the table above, traffic volume increases from public or private projects that result in one or more of the following County criteria will also have a significant traffic impact:

1. The additional or redistributed ADT generated by the Project will add 21 or more peak hour trips to a critical movement of an unsignalized intersection, and cause an unsignalized intersection to operate below LOS D, or

2. The additional or redistributed ADT generated by the Project will add 21 or more peak hour trips to a critical movement of an unsignalized intersection currently operating at LOS E, or

3. The additional or redistributed ADT generated by the Project will add 6 or more peak hour trips to a critical movement of an unsignalized intersection, and cause the unsignalized intersection to operate at LOS F, or

4. The additional or redistributed ADT generated by the Project will add 6 or more peak hour trips to a critical movement of an unsignalized intersection currently operating at LOS F, or

5. Based upon an evaluation of existing accident rates, the signal priority list, intersection geometrics, proximity of adjacent driveways, sight distance or other factors, the Project would significantly impact the operations of the intersection.

Project Impacts to Existing Traffic

Signalized intersections and unsignalized intersections were analyzed under AM and PM peak hour conditions. Street segment analysis is based upon the comparison of daily traffic volumes (ADTs) to the City of Escondido's and County of San Diego's Roadway Classification, LOS, and ADT Tables. All the study area intersections are calculated to currently operate at an acceptable service level of LOS C or better during both the AM and PM peak hours with the exception of the N. Ash Street and Lehner Avenue intersection, which is calculated to currently operate at LOS E during the AM peak hour; and with the exception of the N. Ash Street and Vista Avenue intersection, which is calculated to currently operate at LOS E during the AM peak hour. In addition, all roadway segments are calculated to currently operate at acceptable LOS C or better on a daily basis (LLG, Traffic Impact Analysis, 2014, Appendix G).

The Development is calculated to generate 140 daily trips with 11 trips (3 inbound/8 outbound) in AM peak hour and 11 trips (7 inbound/4 outbound) during PM peak hour. The Development traffic was distributed to the local street system based on the Development's proximity to I-15, local roadway network, employment centers, commercial areas, local schools and traffic circulation. In addition, future immediate area cumulative development potential was taken into consideration in the traffic analysis, as well as several specific cumulative development projects to analyze the impacts of the Development with and without future development. Tables 15 and 16 on the following pages show the existing conditions and expected post-Development operational conditions for affected intersections and road segments.

Table 15: NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project			Significant?	Existing + Project + "Adjacent" Residential Projects			Significant?
			Delay[a]	LOS[b]	Delay	LOS	Δ[c]		Delay	LOS	Δ	
1. N. Broadway / Stanley Ave	MSSC[d]	AM	21.1	C	22.2	C	1.1	No	26.1	D	3.8	No
		PM	11.4	B	11.4	B	0	No	11.7	B	0.3	No
2. N. Ash St / Stanley Ave	AWSC[e]	AM	12	B	12.3	B	0.3	No	13	B	0.7	No
		PM	9	A	9.1	A	0.1	No	9.6	A	0.4	No
3. N. Ash St / Lehner Ave	AWSC	AM	30.5	E	31.4	E	0.9	No	23.4	C	(8.0)[f]	No
		PM	11.1	B	11.2	B	0.1	No	11.6	B	0.4	No
4. N. Broadway / Vista Ave	Signal	AM	13	B	13.1	B	0.1	No	14.2	B	1.1	No
		PM	8.7	A	8.7	A	0	No	8.9	A	0.2	No
5. N. Ash St / Vista Ave	AWSC	AM	47	E	47.4	E	0.4	No	**75.8**	**F**	**28.4**	**Yes**
Mitigated[g]		*AM*						–	*29.2*	*C*		–
		PM	10.9	B	11	B	0.1	No	13.5	B	2.5	No

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase in delay due to Development.
d. MSSC – Minor street Stop Controlled intersection. Minor street left turn delay is reported.
e. AWSC – All-Way Stop Controlled intersection.
f. Intersection delay improved with rerouting of existing traffic due to closure of Lehner Avenue east of Vista Avenue to through traffic, associated with a different subdivision project on APNs 224-130-07, 08, 12. 13.
g. See *Figure 13-1 in TIA for mitigation* sketch.

General Notes: Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. BOLD typeface indicates a potentially significant impact.

SIGNALIZED		UNSIGNALIZED	
DELAY/LOS THRESHOLDS		DELAY/LOS THRESHOLDS	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 45.0	D	25.1 to 30.0	D
45.1 to 80.0	E	30.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

Table 16: NEAR-TERM STREET SEGMENT OPERATIONS

Street Segment	Jurisdiction	Capacity (LOS E)	Existing			Existing + Project				Significant?	Existing + Project + "Adjacent" Residential Projects				Significant?
			ADT[a]	LOS[b]	V/C[c]	ADT	LOS	V/C	Δ[d]		ADT	LOS	V/C	Δ	
N. Ash Street															
Stanley Ave to Lehner Ave	City	12,000 [e,f]	4,200	B	0.350	4,270	B	0.356	0.006	No	4,700	B	0.392	0.036	No
	County	12,900 [g,f]	4,200	C	0.326	4,270	C	0.331	70	No	4,700	C	0.364	70	No
South of Vista Ave	City	12,000 [e,f]	7,040	C	0.587	7,080	C	0.590	0.003	No	7,720	C	0.590	0.000	No
	County	12,900 [g,f]	7,040	D	0.546	,080	D	0.549	40	No	7,720	D	0.549	40	No
Stanley Avenue															
East of N. Ash St	City [h]	4,500 [i]	660	C	N/A	800	C	N/A	N/A	No	1,120	C	N/A	N/A	No
Vista Avenue															
N. Broadway to Ash St	City	12,000 [e,f]	4,170	B	0.348	4,190	B	0.349	0.002	No	4,870	B	0.406	0.057	No
	County	12,900 [g,f]	4,170	C	0.323	4,190	C	0.325	20	No	4,870	C	0.378	20	No
N. Broadway															
South of Vista Ave	City [h]	37,000	10,740	A	0.29	10,81	A	0.292	0.002	No	11,710	A	0.316	0.024	No

Footnotes:

a. Average Daily Traffic Volumes.
b. Level of Service.
c. Volume to Capacity ratio.
d. Development Attributable increase in V/C.
e. Capacity based on the City of Escondido *Roadway Capacity Table (Appendix C).*
f. A 20% reduction in capacity was applied to this segment, as it is not fully built to City standards.
g. Capacity based on the County of San Diego Mobility Element Table (Appendix C).
h. Roadway capacity in both the City of Escondido and San Diego County.
i. Level of Service is not reported for residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Level of service normally applies to roads carrying through traffic between major traffic generators and attractors. County equates LOC better than LOS C operations.

General Notes: Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. Data shown in this table for County analysis was provided to VCS by LLG for informational purposes and was not included as part of the original TIA.

As shown in Table 15 above, analysis of the Development's potential impacts to Existing Conditions and to Existing Conditions + Adjacent Residential Projects determined that all study area intersections are calculated to continue operation at LOS C or better during both the AM and PM peak hours except for the intersections of N. Broadway / Stanley Avenue and N. Ash Street / Vista Avenue. The N. Broadway / Stanley Avenue intersection is calculated to continue operation at LOS D during the AM peak hour. The N. Ash Street / Vista Avenue intersection is calculated to continue operation at LOS F, also during the AM peak hour. Potentially significant impacts would be associated with the change in LOS for the N. Ash Street / Vista Avenue intersection only, based on the significance criteria thresholds discussed above and without mitigation. As shown in Table 16 above, all of the study area street segments are calculated to continue operation at LOS C or better on a daily basis. Therefore, the Development would have no significant impacts on street segment operation based on significance criteria thresholds (LLG, Traffic Impact Analysis, 2014, Appendix G). The additional 50 ADT estimated by the future development in the Additional Annexation Area would not contribute sufficient trips to alter the conclusions of the traffic analysis (personal communication, Ryan Waufle, BHA Engineering).

Cumulative Project Impacts to Traffic

The analysis of the impacts at intersections from Development implementation to cumulative conditions represents a more robust analysis of the potential long-term impacts associated with this Development plus other reasonably foreseeable projects that will occur in the future in the immediate vicinity of the proposed Development. Additionally, the cumulative analysis takes into account planned future changes to the roadway system. Specifically, a proposed subdivision at Lehner and Vista is currently being analyzed by the City, which includes the closure of the intersection of Lehner Avenue and Vista Avenue and the change of Lehner Avenue from a through street between Vista Avenue and N. Ash Street to a cul de sac with access from N. Ash Street only. Therefore, the cumulative analysis models future traffic conditions, given the proposed Development plus reasonably foreseeable future projects on the road system with the planned changes previously described. Analysis of the Development's potential cumulative impacts is shown on the following pages in Tables 17 and 18. The additional 50 ADT estimated by the future development in the Additional Annexation Area would not contribute sufficient trips to alter the conclusions of the traffic cumulative analysis (personal communication, John Boarman, LLG Engineering).

Table 17: EXISTING + PROJECT + CUMULATIVE PROJECTS INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project + Total Cumulative Projects		Significant?
			Delay[a]	LOS[b]	Delay	LOS	
1. N. Broadway / Stanley Ave	MSSC[c]	AM	21.1	C	28.1	D	No
		PM	11.4	B	12.1	B	No
2. N. Ash St / Stanley Ave	AWSC[d]	AM	12	B	13.6	B	No
		PM	9	A	9.6	A	No
3. N. Ash St / Lehner Ave	AWSC	AM	30.5	E	25.2	D	No
		PM	11.1	B	11.8	B	No
4. N. Broadway / Vista Ave	Signal	AM	13	B	14.4	B	No
		PM	8.7	A	9.2	A	No
5. N. Ash St / Vista Ave	AWSC	AM	47	E	**78.1**	**F**	**Yes**
Mitigated [e]		*AM*			*32.7*	*C*	–
		PM	10.9	B	15.2	C	No

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. MSSC – Minor street Stop Controlled intersection. Minor street left turn delay is reported. AWSC – All-Way Stop Controlled intersection.
d. Intersection delay improved with rerouting of existing traffic due to closure of Lehner Avenue east of Vista Avenue to through traffic, associated with a different subdivision project on APNs 224-130-07, 08, 12. 13.
e. See *Figure 13-1 in TIA for mitigation* sketch.

SIGNALIZED		UNSIGNALIZED	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 45.0	D	25.1 to 30.0	D
45.1 to 80.0	E	30.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

General Notes:

Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. BOLD and highlighted typeface indicates a potentially significant impact.

Table 18: EXISTING + PROJECT + CUMULATIVE PROJECTS SEGMENT OPERATIONS

Street Segment	Jurisdiction	Capacity (LOS E)	Existing			Existing + Project + Total Cumulative			Significant?
			ADT[a]	LOS[b]	V/C[c]	ADT	LOS	V/C	
N. Ash Street									
Stanley Ave to Lehner Ave	City	12,000 [d,e]	4,200	B	0.350	4,860	B	0.405	No
	County	12,900 [f,e]	4,200	C	0.326	4,860	C	0.377	No
South of Vista Ave	City	12,000 [d,e]	7,040	C	0.587	7,820	C	0.652	No
	County	12,900 [f,e]	7,040	D	0.546	7,820	D	0.606	No
Stanley Avenue									
East of N. Ash St	City [g]	4,500 [h]	660	C	N/A	1,200	N/A	N/A	No
Vista Avenue									
N. Broadway to Ash St	City	12,000 [d,e]	4,170	B	0.348	5,230	B	0.436	No
	County	12,900 [f,e]	4,170	C	0.323	5,230	C	0.405	No
N. Broadway									
South of Vista Ave	City [g]	37,000	10,740	A	0.29	12,420	A	0.336	No
	City	12,000 [d,e]							

Footnotes:

a. Average Daily Traffic Volumes.
b. Level of Service.
c. Volume to Capacity ratio.
d. Capacity based on the City of Escondido *Roadway Capacity Table (Appendix C).*
e. A 20% reduction in capacity was applied to this segment, as it is not fully built to City standards.
f. Capacity based on the County of San Diego Mobility Element Table (Appendix C).
g. Roadway capacity in both the City of Escondido and San Diego County.
h. Level of Service is not reported for residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Level of service normally applies to roads carrying through traffic between major traffic generators and attractors. County equates LOC better than LOS C operations.

General Notes: Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. Data shown in this table for County analysis was provided to VCS by LLG for informational purposes and was not included as part of the original TIA.

The cumulative analysis determined that all the study area intersections are calculated to continue to operate at LOS C or better during both the AM and PM peak hours with the exception of the intersections of N. Broadway / Stanley Avenue and N. Ash Street / Lehner Avenue, which will both continue to operate at LOS D during the AM peak hour; and with the exception of the intersection of N. Ash Street and Vista Avenue, which is forecast to continue to operate at LOS F during the AM peak hour. Based on the significance criteria thresholds, the Project's cumulative impacts on the intersection of N. Ash Street / Vista Avenue would be considered significant without mitigation (LLG, Traffic Impact Analysis, 2014, Appendix G). In addition, without mitigation, significant impacts as defined in Escondido Municipal Code Section 33-924 are triggered by this Project.

Mid Afternoon Peak Hour Analysis

A Mid-Afternoon peak hour intersection analysis was conducted for all analysis scenarios to determine the operations at the two intersections during the afternoon school bell. Peak hour counts were conducted between 2:00 PM and 4:00 PM. Analysis of the Development's potential impacts based on mid-afternoon peak hour analysis is shown on the following pages in Tables 19 and 20.

Table 19: NEAR-TERM INTERSECTION OPERATIONS (MID-AFTERNOON TIME FRAME)

Intersection	Control Type	Existing		Existing + Project			Significant?	Existing + Project + "Adjacent" Residential Projects			Significant?
		Delay[a]	LOS[b]	Delay	LOS	Δ[c]		Delay	LOS	Δ	
3. N. Ash St / Lehner Ave	AWSC [d]	37.6	E	38.3	E	0.7	No	**39.8**	**E**	**2.2**	**Yes**
Mitigated [e]								*26.6*	*D*		
5. N. Ash St / Vista Ave	AWSC	41.8	E	42.2	E	0.4	No	**66.8**	**F**	**25.0**	**Yes**
Mitigated [e]		–	–	–	–	–	–	*28.8*	*C*	–	–

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase in delay.
d. AWSC – All-Way Stop Controlled intersection.

SIGNALIZED		UNSIGNALIZED	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 45.0	D	25.1 to 30.0	D
45.1 to 80.0	E	30.1 to 50.0	E

General Notes:

Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. BOLD typeface indicates a potentially significant impact.

Table 20: EXISTING + PROJECT + CUMULATIVE PROJECTS INTERSECTION OPERATIONS (MID-AFTERNOON TIME FRAME)

Intersection	Control Type	Existing		Existing + Project + Total Cumulative Projects			Significant?
		Delay[a]	LOS[b]	Delay	LOS	Δ[c]	
3. N. Ash St / Lehner Ave	AWSC [d]	37.6	E	**45.3**	**E**	**7.7**	**Yes**
Mitigated [e]				*30.2*	*D*	–	–
5. N. Ash St / Vista Ave	AWSC	41.8	E	**75.1**	**F**	**33.3**	**Yes**
Mitigated [e]		–	–	*31.3*	*C*	–	–

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase in delay.
d. AWSC – All-Way Stop Controlled intersection.

General Notes: Analysis is based on the Development's originally proposed 14 units rather than the currently proposed 13 units. BOLD typeface indicates a potentially significant impact.

SIGNALIZED		UNSIGNALIZED	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 45.0	D	25.1 to 30.0	D
45.1 to 80.0	E	30.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

The mid-afternoon peak hour analysis determined that the Project would have potentially significant impacts to the intersections of N. Ash Street / Lehner Avenue and N. Ash Street / Vista Avenue under the Existing + Project + Adjacent Residential Project conditions and cumulatively under Existing + Project + Total Cumulative Project Conditions. Potentially significant impacts would be associated with the change in LOS at N. Ash Street / Vista Avenue and with the anticipated delays in service anticipated at both intersections without mitigation (LLG, Traffic Impact Analysis, 2014, Appendix G).

a) Would the Project *conflict with an adopted plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Less Than Significant With Mitigation. The TIA prepared for the Development analyzed the near-term intersection operations, near-term street segment operations, highway capacity, traffic volumes associated with the Project + Adjacent Projects, and traffic volumes associated with the Project + future (cumulative) projects. Under the scenarios analyzed for Existing + Project + "Adjacent" Residential Projects; Existing + Project + Total Cumulative Projects; and for near-term and cumulative operations during the mid-afternoon time-frame; the proposed Development was found to result in potentially significant impacts to the intersections of N. Ash Street / Lehner Avenue and N. Ash Street / Vista Avenue. The potentially significant impacts are associated with the anticipated change in LOS at N. Ash Street / Vista Avenue and with the

anticipated delays in service anticipated at both intersections (LLG, Traffic Impact Analysis, 2014, Appendix G). Mitigation measures MM T-1 and MM T-2 discussed below provide for making improvements to both of these intersections, for making associated street improvements, and for paying a fair-share contribution to signalize the intersection of N. Ash Street / Vista Avenue. Implementation of mitigation measures MM T-1 and MM T-2 will reduce the potential impacts to below significance per City and County standards.

The Project's Additional Annexation Area includes a change to existing zoning for 3 contiguous parcels south of Lehner Avenue, in addition to the Project's Development footprint. The zoning change will allow for an increased density from 1 house to 5 houses should these parcels be developed in the future (net increase of 4 units). The parcels' change in density, as a result of the Additional Annexation Area, is consistent with the City's General Plan for area build-out, and consistent with the City's pre-zoning designation. In addition, the additional 4 peak hour trips associated with the Additional Annexation Area do not have the potential to change the LOS of surrounding intersections because those few peak hour trips are less than the day to day fluctuations of traffic in the study area and less than the potential modeling error (LLG, 2014). Furthermore, the traffic modeling of cumulative conditions accounts for the general background growth of traffic in future conditions, which exceeds the minor increase in peak hour trips associated with the Additional Annexation Area.

b) *Would the Project conflict with an adopted congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the appropriate congestion management agency for designated roads or highways?*

Less Than Significant With Mitigation. See XVI.a, above.

c) *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. This Project does not include any activities associated with air traffic.

d) *Would the Project substantially increase hazards due to a design feature (e.g., sharp curves of dangerous intersections) or incompatible uses (e.g., farm equipment)?*

No Impact. The Development design is consistent with City street design standards and the 13-unit residential development does not result in hazards related to design features. The Additional Annexation Area south of Lehner Avenue proposes no development at this time. If future development of this area is to occur, it could be subject to additional review under CEQA and must be in conformance with City street design standards at the time of review.

e) *Would the Project result in inadequate emergency access?*

No Impact. The City has confirmed that the Development design is consistent with City street design and will not impede emergency access to or from the Development. If future development of the Additional Annexation Area occurs, it could be subject to additional review

under CEQA and would be required to be in conformance with City street design standards at the time of review.

f) *Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, pedestrian facilities, or other alternate transportation or otherwise decrease the performance or safety of such facilities?*

No Impact. The closest public transportation access point is at North Broadway and Stanley Avenue, a North County Transit Authority Bus route. Two proposed Class III bicycle routes (provides for shared use with pedestrian or motor vehicle traffic) and one Class II bicycle route (provides a striped lane for one-way bike travel on a street or highway adjacent to auto travel lanes) are within approximately 0.22 mile of the Project Area. The performance or safety of these proposed routes/existing roads will not be affected by the construction or operation of the Project.

Source(s): Traffic Impact Analysis (LLG, 2014); General Plan Update, Mobility and Infrastructure Element.

Transportation and Traffic Avoidance, Minimization, and Mitigation. Two potentially significant impacts to transportation and traffic associated with the intersections listed below were determined based on the significance criteria thresholds:

1. N. Ash Street / Lehner Avenue
2. N. Ash Street / Vista Avenue

The following mitigation measures are included to mitigate the Project's potential impacts to below significance:

MM T-1: N. Ash Street / Lehner Avenue - The applicant/developer shall improve this intersection prior to construction of the 40th dwelling unit within the Lehner / Stanley block (the area bound by N. Ash Street / Conway Drive / Lehner Avenue and Stanley Avenue). Dedicated turn lanes should be provided at the southbound, westbound and northbound approaches. The applicant/developer will be responsible for all widening, transitions, necessary right of way acquisitions and other aspects of the design and construction process to the City Engineer's satisfaction. School related signing and striping should be implemented at the intersection per the Manual on Uniform Traffic Control Devises (MUTCD).

MM T-2: N. Ash Street / Vista Avenue - The applicant/developer shall improve this intersection with dedicated turn lanes on all approaches prior to construction of the 40th dwelling unit within the Lehner / Stanley block (the area bound by N. Ash Street / Conway Drive / Lehner Avenue and Stanley Avenue). School related signing and striping should be implemented at the intersection per the MUTCD. The applicant/developer will be responsible for all widening, transitions, necessary right of way acquisitions and other aspects of the design and construction process to the City Engineer's satisfaction.

MM T-3: No construction material or equipment deliveries should be scheduled during peak school pick-up/drop-off periods

MM T-4: The Development shall construct a 4-foot wide pedestrian path along Conway Street between Rincon Avenue and Stanley Avenue.

MM T-5: Prior to the issuance of a building permit, the applicant/developer shall deposit with the City a Fair Share Contribution for the construction of a traffic signal at the N. Ash Street/Vista Avenue intersection to the satisfaction of the City Engineer.

XVII. Utilities and Service Systems

Would the Project:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

XVII. Utilities and Service Systems Discussion:

In the proposed Development Agreement for the Development, the City acknowledges that it will have sufficient capacity in its infrastructure services and utility systems, including, flood control, sewer collection, sewer treatment, sanitation service and, except for reasons beyond the City's control, water supply, treatment, distribution and service, to accommodate the Development. To the extent that the City renders such services or provides such utilities, the City agrees that it will serve the Development and that there shall be no restriction on connections or service for the Development except for reasons beyond the City's control. However, the City has indicated that it can guarantee sufficient capacity for sewer collection, sewer treatment and sanitation service for the Development for only one year from the Effective Date pursuant to the Development's Development Agreement. As part of the City's standard agreement language, the City will only guarantee one year of service to protect against instances where an approved Development's construction phase is postponed to a future time where capacity has eventually decreased to inadequate levels. Consultation with the City's sewer plant engineer has verified that current capacity is more than adequate to service the Development and is projected to remain adequate for approximately 10 years based on current demand and anticipated growth, including the Additional Annexation Area.

The Development site and Annexation Area properties are currently on septic systems. Serving these County areas with existing City wastewater treatment facilities will eliminate the existing potential for leakage of the septic systems. The County zoning is related to the number of homes that can be accommodated by septic systems, and upon rezoning of the properties, the County's septic requirements are no longer applicable. Therefore, because the wastewater treatment of the residences to be constructed in the Project Area will be substantially improved to be compliant with City regulations, the potential impacts to County requirements for septic systems in this area will not be further discussed.

The Development Agreement for Tract 889 (a development previously approved by the City) located just west of the subject property requires Tract 889 to install a 12" water line in Stanley Avenue. The proposed Development would benefit from the installation of that water line and the Project's Development Agreement provides for the fair-share reimbursement of funds to the owner of Tract 889 for the installation of the 12" water line in Stanley Avenue in amount of $3,555 per unit.

New easements, as needed, will be provided for underground drainage, water, sewer, gas, electricity, telephone, cable, and other utilities and facilities.

a) Would the Project *exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Less Than Significant Impact. The Project would require adequate sewer and treatment services for the proposed 18 single-family residential units. These services would be provided by existing City utility lines with approval by the City Engineer and in accordance with applicable Master Plans. The City has acknowledged that sufficient capacity for sewer collection, sewer treatment and sanitation service for the Development will exist as of the Effective Date per the Development's Development Agreement and will guarantee sufficient capacity for sewer collection, sewer treatment and sanitation service for the Project for one year from the Effective Date. As discussed above, the City has determined that it has more than adequate capacity to support the additional 18 single-family residential units, provided project construction is completed within the next 10 years. The Project would have no additional wastewater treatment elements that could exceed Regional Water Quality Control Board requirements.

b) Would the Project *require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Less Than Significant Impact. Per the Development's Development Agreement with the City, the Project will construct an 8-inch water line within the development; the project will also provide a reimbursement of $3,555 per unit for construction of a new 12" water line within Stanley Avenue between Ash Street and Conway Drive. The Development's contribution to construction of the new water line will provide adequate water supply and capacity to support the Development and reduce potential impacts to a level below significance. No significant effects will occur from construction of the new water line that will take place within an existing street. The development of the Additional Annexation Area will be required to coordinate with the City

Engineer and will likely be required to contribute to the cost of the infrastructure improvements to the water line.

c) *Would the Project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Less Than Significant Impact. The Project would incrementally increase the amount of surface runoff as a result of additional pavement and hardscaped surfaces. The Development proposes one on-site bioretention basin, which would collect and treat the runoff generated by the Development before releasing it. In addition, Implementation of MM HYD-1a described in the section on Hydrology and Water Quality will ensure adequate drainage improvements are constructed to handle storm water to the City's satisfaction. The existing road drainage facilities are adequate to provide conveyance of increased storm water flows due to the minor road improvements. Furthermore, the Development will contribute to new off-site drainage improvements through payment of a Community Benefit Fee/Infrastructure Deficiency Fee. Future development of the Additional Annexation Area will also require coordination with the City regarding on-site bioretention facilities needed to treat and detain storm water generated by the future development and will need to comply with existing City, state, and federal requirements regarding the treatment and release of storm water. Consequently, potential impacts would be less than significant.

d) *Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?*

Less Than Significant Impact. According to the City of Escondido General Plan Figure III-12, the Project is within the City of Escondido Utilities Department Water Service Area. Sufficient water supplies are available to serve the Project from existing entitlements and resources. To ensure adequate supply and service, the Project would comply with all applicable design criteria of the City of Escondido 2012 Water Master Plan. In addition, the Development will pay Development Impact Fees upon issuance of building permits to offset any potential impacts to water supply infrastructure, and it is presumed that the residential development on the Additional Annexation Area will also be required to comply with the applicable design criteria of the Water Master Plan and to pay the impact fees.

e) *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?*

Less Than Significant Impact. According to the City of Escondido General Plan Figure III-14, the Project is within the Escondido Sewer Service Area boundary and is identified as a future sewer service area in Figure 2-8 of the Escondido Wastewater Master Plan. The Development would create an incremental increased demand on sewer service systems that would be offset by development impact fees including the Wastewater Connection Fee, and it is presumed that the

residential development on the Additional Annexation Area will also be required to pay the connection fee.

f) *Would the Project be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?*

No Impact. Escondido Disposal (EDCO) would provide the Project with solid waste services. Solid waste would be taken to one of several transfer stations in the area and then disposed of at the Sycamore Landfill in Santee, California. According to the County of San Diego Countywide Integrated Waste Management Plan, this landfill has sufficient capacity to accommodate the Project's solid waste.

g) *Would the Project comply with federal, state, and local statutes and regulations related to solid waste?*

No Impact. The Development would produce solid waste associated with both the construction and occupancy phases of the Project. Both phases would implement required solid waste reduction measures to reduce the amount of waste generated, reuse and/or recycle materials to the greatest extent feasible, utilize materials made of post-consumer materials where possible, and dispose of solid waste at an appropriate facility in compliance with all federal, state, and local statutes and regulations. Future development on the Additional Annexation Area will also be required to implement required solid waste reduction measures to reduce the amount of waste generated, reuse and/or recycle materials to the greatest extent feasible, utilize materials made of post-consumer materials where possible, and dispose of solid waste at an appropriate facility in compliance with all federal, state, and local statutes and regulations.

Source(s): Citywide Facilities Plan (City of Escondido, 2009); City of Escondido General Plan (City of Escondido, 2013); Countywide Integrated Waste Management Plan (County of San Diego, 2012); Fee Guide For Development Projects (City of Escondido, 2013); Field Investigation; Project Description; Wastewater Master Plan (City of Escondido, 2012); Water Master Plan (City of Escondido, 2012); Water Quality Technical Report (BHA, Inc., 2013).

XVIII. Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
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.)	☐	☒	☐	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

XVIII. Mandatory Findings of Significance Discussion:

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?***

***Less Than Significant With Mitigation*.** Implementation of City requirements to replace the 51 mature trees that would be removed by the Development at a 1:1 ratio (at a 2:1 ratio for the protected tree) with a minimum size of 24-inch box would reduce the impacts from loss of this resource (**MM BIO-1a**). Future development on the Additional Annexation Area that would impact mature or protected trees would also be mitigated at these ratios (**MM BIO-1b**). The Development and future development on the Additional Annexation Area would result in potential impacts to raptors and nesting birds. Any Project activity that has a potential to directly adversely affect raptors and nesting birds (e.g., removal of a nest) would implement **MM BIO-2 and MM Bio-3** to ensure no impact would occur to raptors or nesting birds. The Additional Annexation Area supports approximately 1.27 acres of NNG; impacts to the NNG from future development on the Additional Annexation Area would be offset by the implementation of **MM BIO-4** which requires the purchase of credits at a reduced ratio of 0.5:1 from the Daley Ranch Mitigation Bank or other acceptable banking program. Construction of the Development and future development of the Additional Annexation Area will increase the amount of impervious surface. Implementation of **MM HYD-1a** will ensure adequate drainage improvements are constructed to handle storm water to the City's satisfaction.

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)?***

Less Than Significant With Mitigation**.** No impacts were identified as potentially cumulatively significant except for traffic impacts associated with a potential decrease in LOS at the intersections of N. Ash Street / Lehner Avenue and N. Ash Street / Vista Avenue as discussed in the Transportation and Traffic section above (LLG, Traffic Impact Analysis, 2014, Appendix G). Therefore, mitigation measure **MM T-1 through 5** will be implemented to ensure this impact is reduced below significance. Incremental increases in impacts to the environment (e.g., air, biological resources, land use, etc.) are within the thresholds set by the City's General Plan and supporting planning documents.

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

Less Than Significant With Mitigation**.** Potential significant impacts associated with construction noise have been identified. Implementation of **MM N-1 through 8** will reduce these potential adverse effects on human beings to below significance. In addition, project activities that have a potential to adversely affect human beings (e.g., potential for spill during construction) would implement BMPs to ensure no impact would occur.

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