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

NEGATIVE DECLARATION

Classical Academy High School Relocation
(Case No.: PHG 12-0023)
ENVIRONMENTAL CHECKLIST
SUPPLEMENTAL COMMENTS

INTRODUCTION

This Negative Declaration (ND) assesses the environmental effects that may result from the proposed re-use of an approximately 3.87 acre site from an existing office and former newspaper printing facility to a public charter high school. The site proposed for the school campus is addressed at 207 East Pennsylvania Ave in the City of Escondido Downtown Specific Plan Area (Figure 1, Regional Location Map and Figure 2, Project Location Map). As depicted on Figure 3, Aerial Site Photograph, the property includes two existing structures currently used by the North County Times, parking and landscaping. The school intends to obtain a Conditional Use Permit (CUP) from the City of Escondido allowing the existing buildings to be used for a public charter high school for a maximum of 700 full-time students. No new buildings are being proposed for the school (Figure 4, Proposed Site Plan). The only proposed modification to the existing building footprints is an approximately 54-foot square foot one-story hallway connecting the two existing buildings. The existing two-story south structure is proposed to be expanded by a total of approximately 3,198 square feet by: (1) internally inserting a second floor of approximately 1,618 square feet into an existing high ceiling space at the southeast end of the building, and (2) fully enclosing an already enclosed on three sides and roofed exterior loading dock on the east end of the building which adds approximately 1,580 square feet of floor area. An open air student court is proposed at the southeast corner of the site. The school proposes to use the existing north structure without increasing square footage. A total of 201 parking spaces will be provided on four separate surface lots. A limited amount of earthwork (330 cubic yards) is proposed for the project to provide surface parking spaces on an approximately 0.32 acre previously graded level vacant lot. Other proposed improvements include interior modifications, a new canopy structure on the west side of the northerly building, facade improvements, painting the two buildings, new signage (which will be subject to a separate signage permit), new landscaping/hardscape in the expanded parking lot and implementation of project features including a stacking zone and signage to ensure efficient drop-off/pick-ups.

An Initial Study Environmental Checklist was prepared for this project and is included as a separate attachment to the Supplemental Comments within this report. The information contained in the Initial Study Environmental Checklist and the Supplemental Comments will be used by the City to determine potential impacts associated with the proposed development. The City of Escondido General Plan Update Final Environmental Impact Report (April 2012) is incorporated by reference.

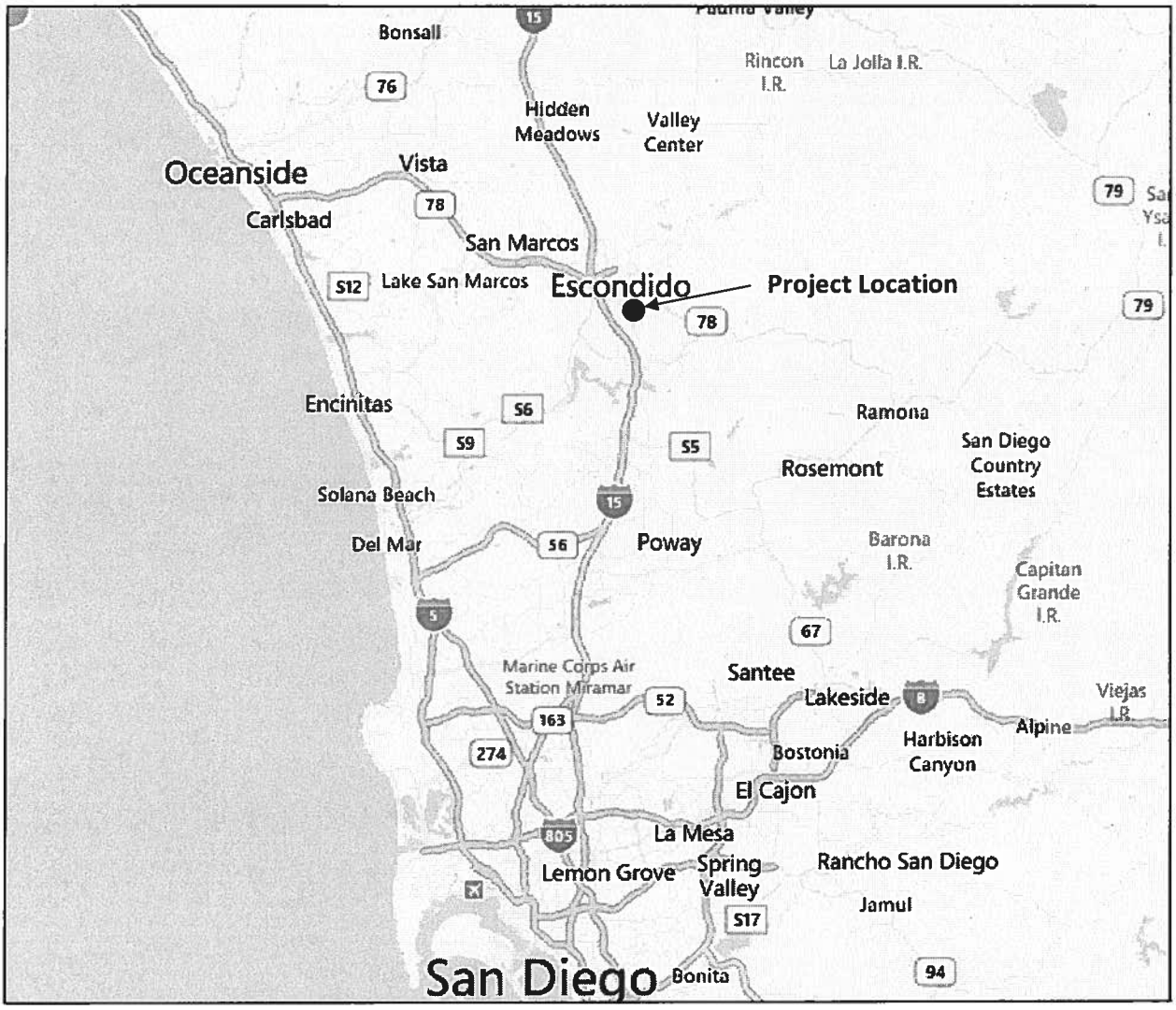


Figure 1 - **Regional Location Map**

NORTH

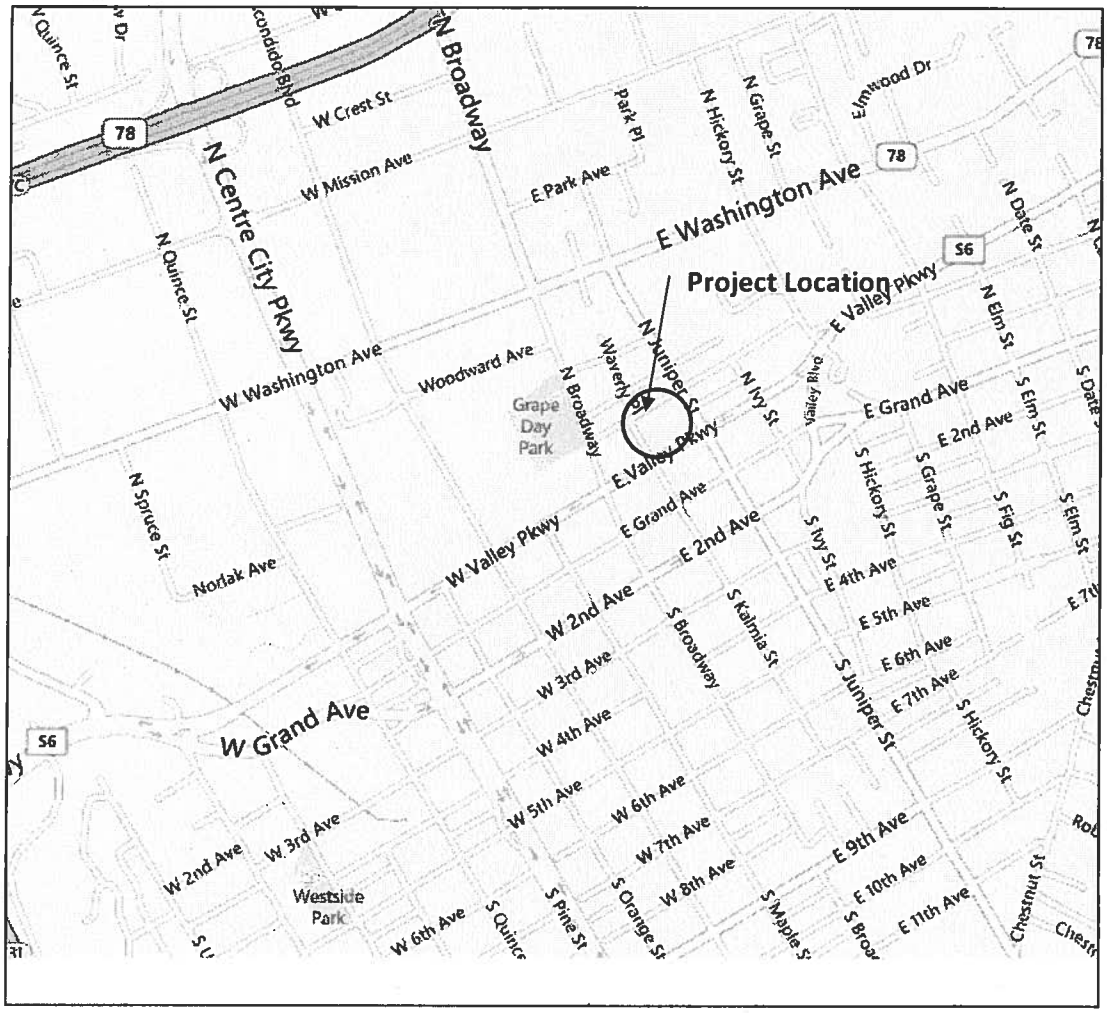


Figure 2 - **Project Location Map**

NORTH

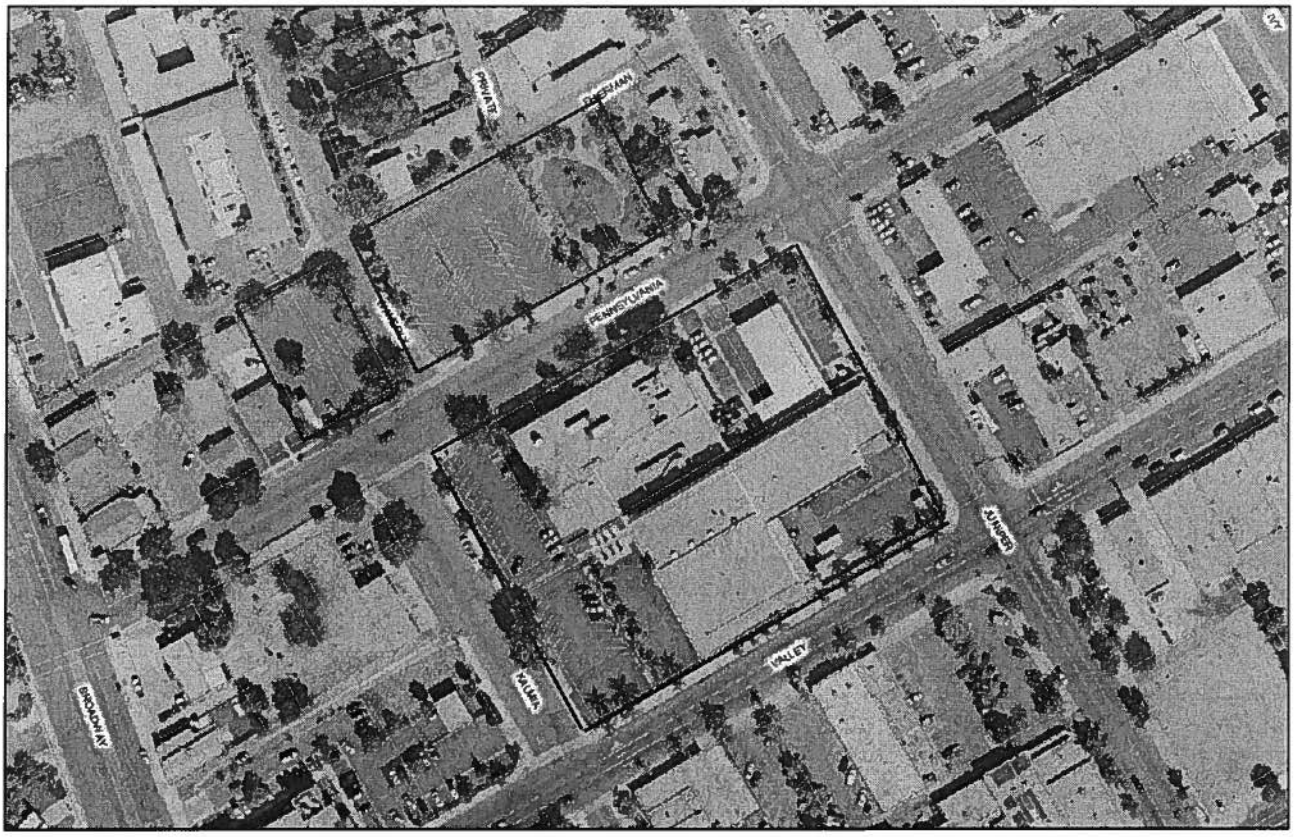
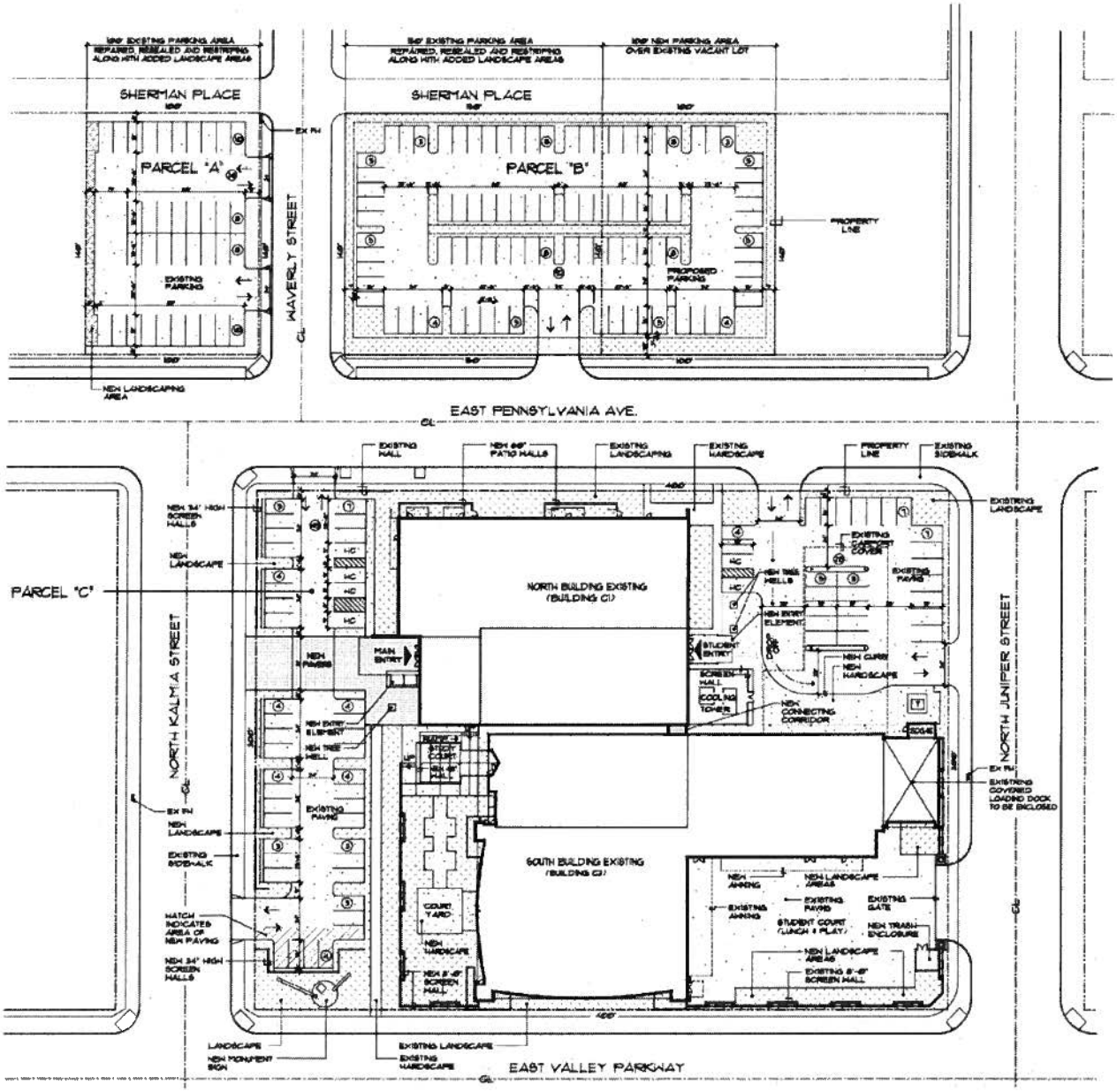


Figure 3 - **Aerial Photo of Site**

NORTH



NORTH

Figure 4 - Site Plan

The detailed Supplemental Comments included in this document identifies and evaluates physical impacts to the environment associated with developing or implementing the proposed project based on preliminary review of a variety of environmental factors identified in the attached Environmental Checklist. Based on information and documentation incorporated in the analysis, it has been concluded that this Initial Study warrants issuing a Negative Declaration (ND), which is a determination that no negative environmental impacts that rise to a level of significance will occur upon developing or implementing the project. The City of Escondido is the lead agency for the project in accordance with the California Environmental Quality Act (CEQA).

As mandated by CEQA Guidelines Section 15105, affected public agencies and the interested public may submit comments on the Negative Declaration (ND) in writing before the end of the *20*-day public review period starting on February 15, 2013 and ending on March 7, 2013. Written comments on this environmental document shall be submitted to the following address by 5:00 p.m., March 7, 2013. Following the close of the public comment review period, the City of Escondido will consider this Negative Declaration (ND) and all received comments in determining the approval of this project.

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025-2798

Contact: Bill Martin, Principal Planner
Telephone: (760) 839-4557
Fax: (760) 839-4313
e-mail: bmartin@escondido.org

A hard copy of this document and any associated plans and/or documentation are available for review during normal operation hours for the duration of the public review period at the City of Escondido Planning Division

DETAILED PROJECT DESCRIPTION / LOCATION

Existing Conditions

The subject property is primarily addressed at 207 East Pennsylvania Ave in the City of Escondido Downtown Specific Plan Area (Figure 1, Regional Location Map and Figure 2, Project Location Map). Classical Academy High School is currently operating at 144 North Woodward Ave., approximately one-third of a mile from the proposed site.

The project site, which includes three separate non-contiguous areas, contains approximately 3.87 acres. The site is divided into three distinct sub-areas for planning purposes (Figure 5, Sub-Areas A, B & C). The following description and the Aerial Photograph, previously referenced as Figure 3 provides information regarding existing uses:

- Sub-Area A - This 0.32 acre portion of the site is currently a parking lot containing 38 parking spaces. It is located at the northwest corner of East Pennsylvania Ave and Waverly Place. No structures are located in Sub-Area A.

- Sub-Area B - The second of the three sub-areas includes approximately .80 acres and is located at the northeast corner of East Pennsylvania Ave and Waverly Place. The existing use of the

property includes 54 parking spaces and a vacant landscaped lot with several Palm trees. No structures are located in Area B.

- Sub-Area C - Encompassing approximately 2.75 acres, this sub-area is bounded on four sides by public streets: East Pennsylvania Ave to the north, North Kalmia Street to the west, North Juniper Street to the east and East Valley Parkway to the south. This portion of the site is further divided into C1 (all lots north of a former alley that has been vacated) and C2 (all lots south of and including the former alley). Sub-Area C includes two buildings: an approximately 30,699 square foot two-story office building in C1 and an approximately 31,836 square foot two-story building which was formerly used as a newspaper printing facility in C2. This portion of the site also includes 42 parking spaces at the northeast corner of C1, 19 of which are under a carport structure. An additional 41 diagonal parking spaces are located on the west side of C1 and C2 and 4 parking spaces are located in a large asphalt paved loading area at the southeast corner of C2.

Figures 6, Site Photographs: Sub-Area A & Sub-Area B and Figure 7, Site Photographs: Sub-Area C, show existing conditions within the various subareas.

Existing Access/Parking

Access to Sub-Area A, an existing parking lot, can be made from two driveways off Waverly Place. Access is not available from Sherman Place which borders the parking lot to the North.

Access to Sub-Area B is from East Pennsylvania Ave. While Waverly Place and Sherman Place also border this portion of the project site, neither of the roads provides ingress nor egress to the existing parking lot.

Current access to Sub-Area C is from two driveways on East Pennsylvania Ave, two driveways on North Kalmia Street and one driveway on North Juniper Street. This site is not directly accessed from East Valley Parkway.

At present, a total of 179 parking spaces can be found within four separate surface lots:

- The parking lot in Sub-Area A currently includes 38 spaces.
- The parking lot in Sub-Area B currently includes 54 spaces.
- The two parking lots in Sub-Area C currently include 87 spaces (divided between 4 spaces on the southeast side, 41 spaces at the west side and 42 spaces at the northeast corner; 19 of which are under a carport structure).

Proposed Project

School Program

The Classical Academy High School (CAHS) is a public charter high school which first offered enrollment in 2006. CAHS is open to any high school student free of charge. The school is accredited by the Western Association of Schools and Colleges. The objective of Classical Academy High School is to prepare all students for college, career, and citizenship by teaching a rigorous and relevant curriculum that meets California state content standards as well as the University of California A-G requirements. The curriculum offered by the school includes a wide range of college prep, honors, Advanced Placement, and elective classes. Current Advanced Placement courses include: US History, Calculus AB, English Language and Composition, English Literature and Composition, Biology, World History and Government. Elective choices at CAHS include: Art,

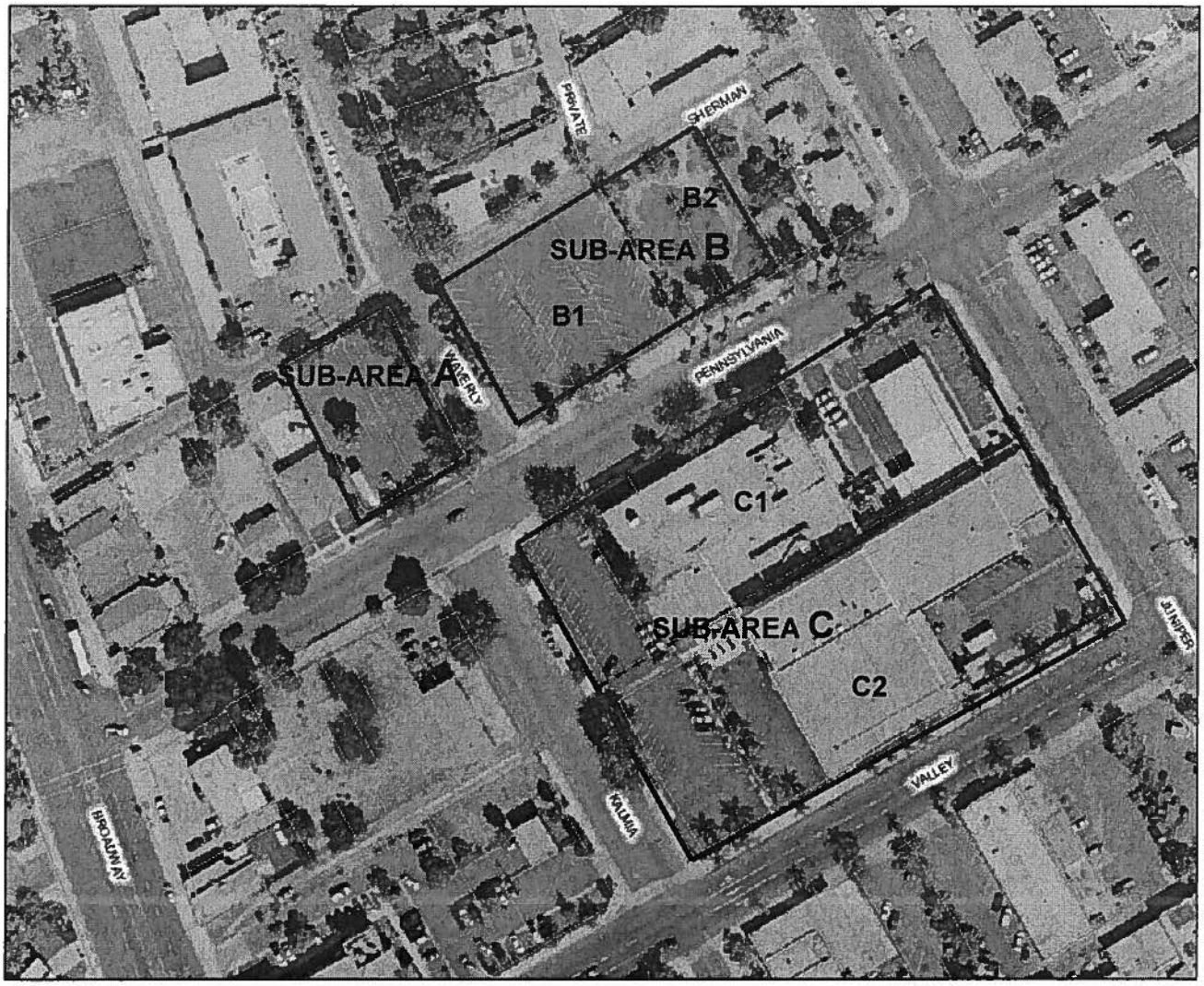
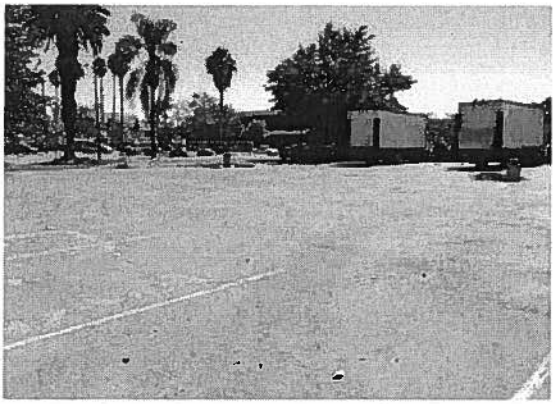


Figure 5 - **Land Parcels Diagram**

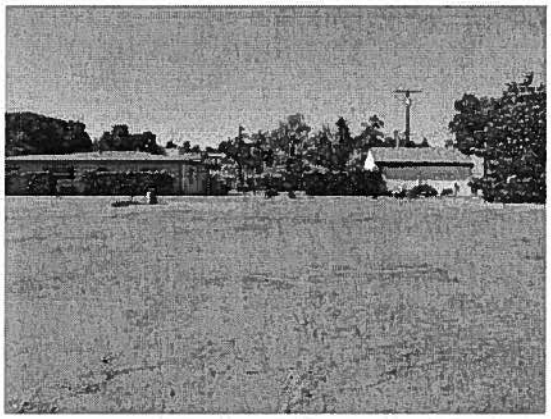
(Sub-Areas/Parcels A, B and C are designated for ease of reference only in the planning process.)



View of parking lot at Sub-Area A looking to the southeast

View of parking lot at Sub-Area B looking east

View of the eastern side Sub-Area B looking north

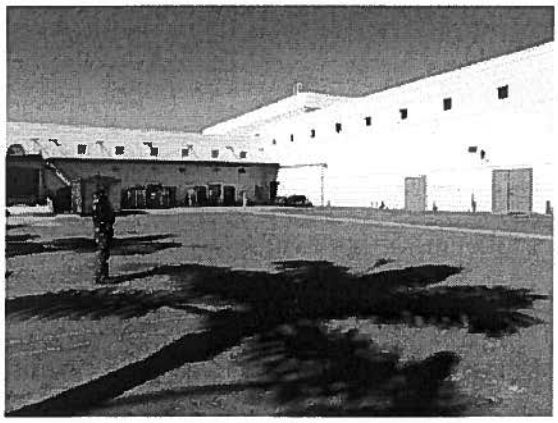


View of parking lot at Sub-Area A looking to the west

Figure 6 - **Site Photographs of Sub-Areas A and B**

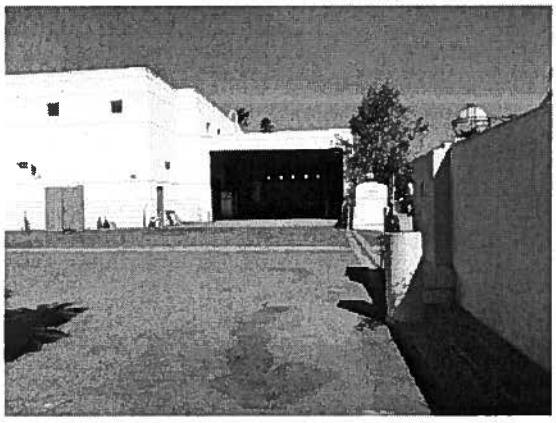
View of the office building looking east from the western portion of Sub-Area C

View of the southern portion of Sub-Area C looking north



View of Sub-Area C looking west from the eastern portion

View of the car canopy located on the northern portion of Sub-Area C



View of Sub-Area C looking northwest from the southeast corner of Sub-Area C

Figure 7 - **Site Photographs of Sub-Area C**

Digital Art, Photography, Speech, Yearbook, Drama, Music Appreciation, Choir, Play Production, Robotics, ASB Leadership, Work Experience, and Teacher's Aide. Students also have the ability to take elective classes at a local community college or through the local Regional Occupation Program.

Sub-Area C of the project site is proposed for a high school campus (Grades 9-12); while Sub-Areas A and B will be limited to associated parking. Although the enrollment for the independent study aspect of the school will fluctuate because this is a non-classroom based educational program, maximum enrollment is projected to be 700 full-time students. Traditional program students attend classes Tuesday-Friday from 8:00 am to 3:00 pm. Students in the independent study program will use the facility on Mondays. As shown in Table 1, it is anticipated that class start times for traditional students will be staggered between 7:30 am-1:40 pm.

TABLE 1
Class Start Times
(Tuesday-Friday)

Period	Class Start Time	Anticipated Arrival Time	Percentage of Students*
0	7:30 AM	7:15-7:30 AM	23%
1	8:50 AM	8:30-8:50 AM	46%
2	10:15 AM	10:00-10:15 AM	23%
3	12:15 PM	12:00-12:15 PM	4%
4	1:40 PM	1:30-1:40 PM	4%

*Based on current student population/class schedules (Source: Classical Academy)

As shown in Table 2, student times departing the school vary, depending if students remain on campus for after-school activities.

TABLE 2
Class Finish Times

Period	Class Finish Times	Percentage of Students*
0	8:45 AM	4%
1	10:10 AM	4%
2	11:35 AM	15%
3	1:35 PM	23%
4	3:00 PM	46%

Period	Class Finish Times	Percentage of Students*
After School Activities	5:00 PM	8%

*Based on current student population/class schedules (Source: Classical Academy)

The school anticipates having a staff consisting of approximately 50 teachers, administrators and other support personnel who typically arrive at 7:00 am and leave at 5:00 pm. The campus may be used for special events or other organized activities on weekends. As discussed in Section XVI Transportation/Traffic, a number of students carpool or use public transportation including the Sprinter and/or North County Transit buses.

Proposed Improvements

As illustrated by the Proposed Site Plan, no new buildings are being proposed. The only proposed modification to the existing building footprints is an approximately 54-foot square foot one-story hallway connecting the two existing buildings. The south structure (Building C2) is proposed for expansion to a total of approximately 3,198 square feet by: (1) internally inserting a second floor of approximately 1,618 square feet into an existing high ceiling space at the southeast end of the building, and (2) fully enclosing an already enclosed on three sides and roofed exterior loading dock on the east end of the building which adds approximately 1,580 square feet of floor area.

The school proposes to use the north structure without increasing the square footage. An open air student court is proposed at the northwest corner of East Valley Parkway and North Juniper Street. A total of 201 parking spaces will be divided into four separate surface lots. A minor amount of earthwork (330 cubic yards) is proposed for the project to provide surface parking spaces on an approximately 0.32 acre previously graded level vacant lot. Other proposed improvements include interior modifications, a new canopy structure on the west side of the northerly building, facade improvements, new masonry courtyard walls, painting the two buildings, new signage (which will be subject to a separate signage permit), and new landscaping/hardscape in the parking lots.

Proposed Access/Parking

The main part of the campus (Sub-Area C) will be served by one vehicle access point on North Kalmia Street, two vehicle access points on East Pennsylvania Ave. and two vehicle access points on North Juniper Street. One of the current driveways on North Kalmia Street (northernmost) which serves the office, and former newspaper printing facility will be eliminated. The southernmost driveway on North Juniper Street is proposed primarily for services such as trash collection and deliveries. Student pick-up and drop-off will occur in the parking area located on the northeastern corner of the campus site. Queuing for vehicles to deliver and pickup students will occur in that parking area and on eastbound East Pennsylvania Avenue, as needed.

No changes are being proposed for the two driveways on Waverly Place that provide access to the parking lot on Sub-Area A. At present, three driveway cuts on East Pennsylvania Ave. serve Sub-Area B. The proposed site plan consolidates the three driveways into a single, more centrally located driveway on East Pennsylvania Ave.

Reconfiguring and re-striping of the parking lots will result in the following:

TABLE 3
Proposed Parking Spaces

Sub-Area	Existing Parking Spaces	Proposed Parking Spaces
Sub-Area A	38	36
Sub-Area B	54	92
Sub-Area C	83	45
Total	179	201

As illustrated on Figure 8 (Vehicle Parking District No. 1), portions of the site are within Vehicle Parking District No. 1. Property owners within Vehicle Parking District No. 1 have paid special assessments for establishing and financing public parking spaces. For the purpose of calculating parking requirements for non-residential use, a property shall be deemed to have the number of spaces required by the City for the most intensive land use permitted for such property. Developers of vacant or underdeveloped parcels are encouraged to provide a number of parking spaces commensurate with their demand, but there is no minimum requirement. The Traffic Impact Study prepared by Linscott, Law & Greenspan dated December 18, 2012, which is included as Appendix D and Section XVI (Transportation/Traffic) of this document provides additional information about existing and proposed vehicular access, queuing and parking.

ANICIPATED PUBLIC MEETINGS/HEARINGS:

-Planning Commission:
It is anticipated that the Planning Commission will consider the proposed Conditional Use Permit and adoption of the Negative Declaration on March 26, 2013. A public hearing notice will be mailed regarding the Planning Commission time and date. Please contact the City of Escondido Planning Division to confirm that date.

PROJECT ENVIRONMENTAL SETTING

The City of Escondido General Plan designates the site as Specific Planning Area #9, which is the area encompassed by the Downtown Specific Plan. The site has a similar SP (Specific Plan) zoning designation that also refers to the Downtown Specific Plan. In March 2008, the City of Escondido adopted the Downtown Specific Plan which envisions the area as "...a dynamic, attractive, economically vital city center providing social, cultural, economic, and residential focus while respecting its historic character. The environment is pedestrian oriented, attracting local and non-local visitors to experience an atmosphere that is entertaining and vibrant with activity occurring throughout the day, evening and weekend hours."

The Downtown Specific Plan area includes seven separate districts. As illustrated by Figure 9, Downtown District Map, the proposed site falls within the following districts: Park View (PV), Creekside Neighborhood (CN) and Historic Downtown (HD). Figure II-2 of the 2012 Specific Plan (Permitted Matrix Use) (as amended by City Council) provides that high schools (Grades 9-12) are allowed in all three districts with approval of a Conditional Use Permit (CUP). Within the HD district, high schools are only allowed on either side of the alley between East

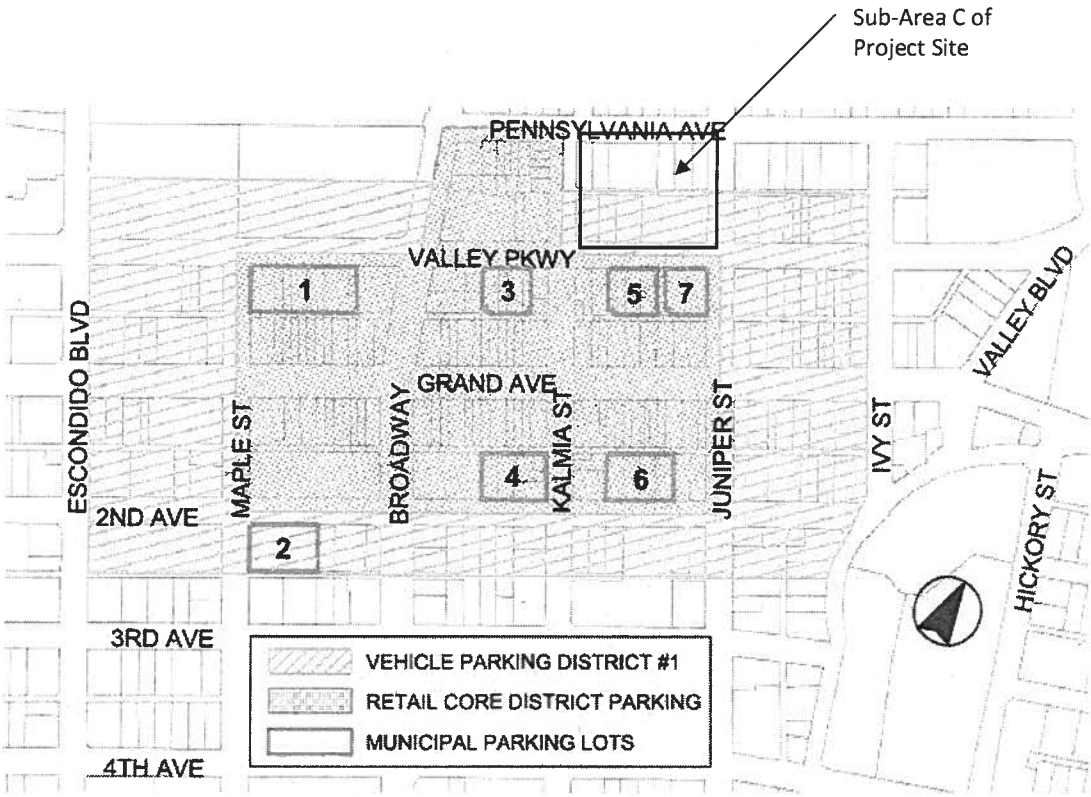
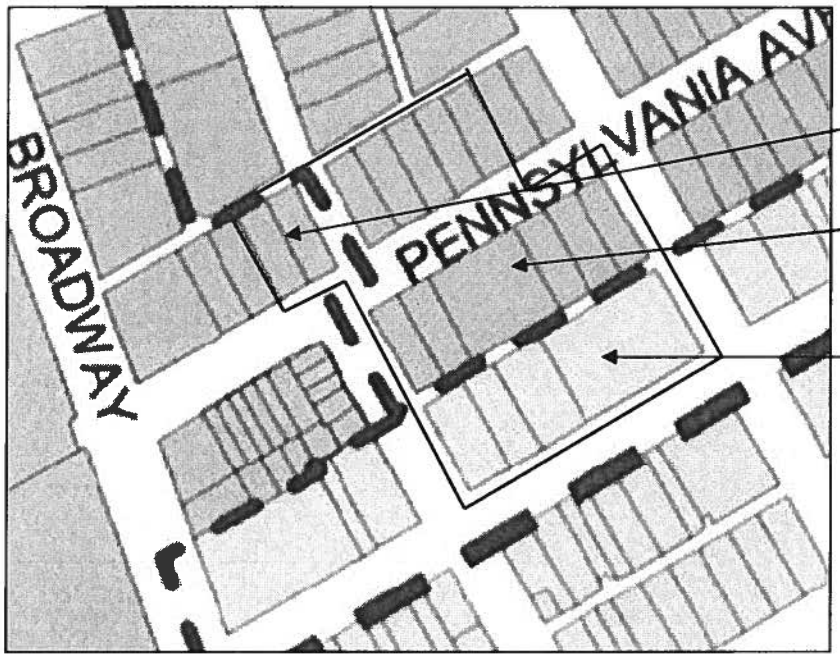


Figure 8 - **Vehicle Parking District No. 1** Source: Downtown Specific Plan, Figure III-2



Park View District (orange)

Creekside Neighborhood District (green)

Historic Downtown District (yellow)

Subject site bounded by red lines.

SITE – See Enlargement above

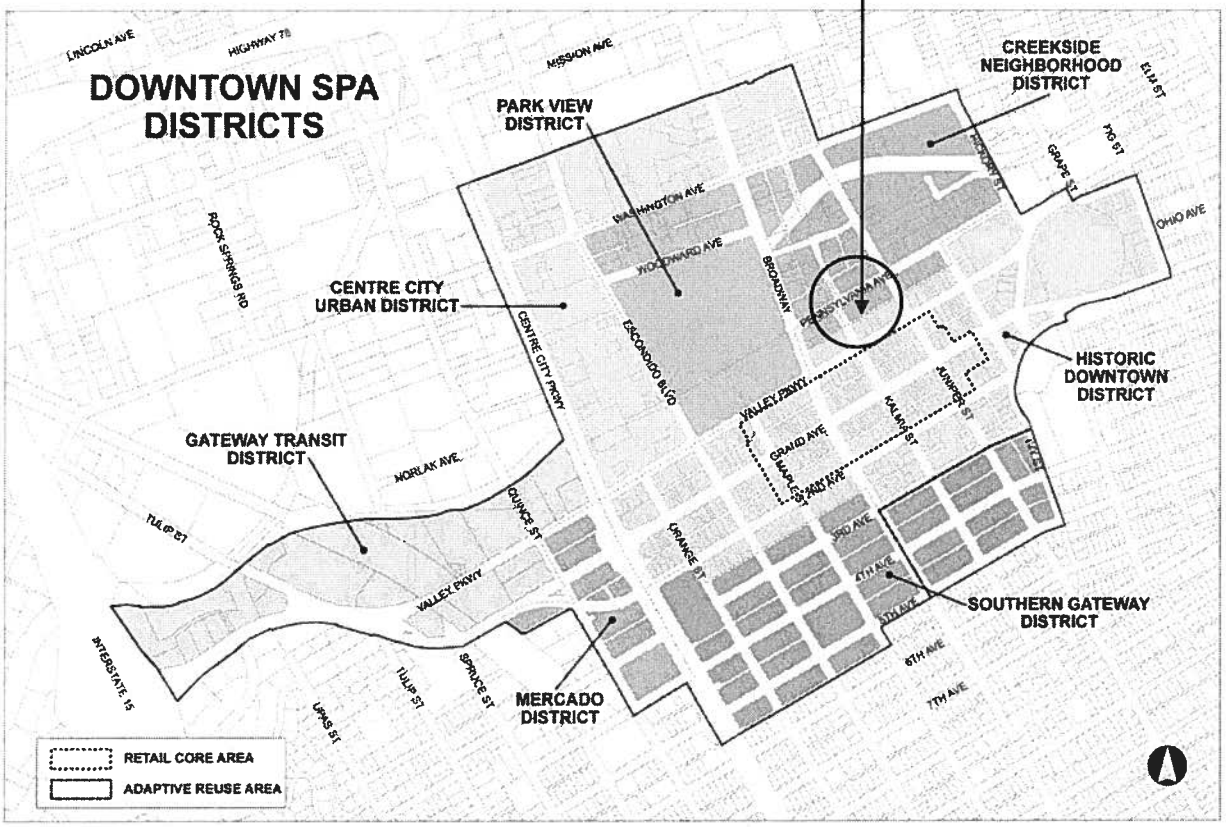


Figure 9 - **Downtown Specific Plan - SPA Area 9** Source: Figure II-1

Pennsylvania Ave and East Valley Parkway. As previously discussed, portions of the site are also within Vehicle Parking District No. 1. The proposed school project does not require a General Plan Amendment, Specific Plan Amendment or rezoning to accommodate the proposed high school.

Existing land uses, General Plan land use designations and zoning for areas surrounding the site are described in Table 3:

TABLE 3
Surrounding Land Uses

	Existing Land Use	**General Plan Land Use Designation**	**Zoning**
North	Multi-Family Housing/Single-Family Housing	SPA #9	SP/ Creekside Neighborhood District
South	Commercial/Auto Repair	SPA #9	SP/ Historic Downtown District
East	Single-Family Uses/Auto Repair/Parking Lot	SPA #9	SP/ Historic Downtown District
West	Multi-Family Housing/ATM & Parking Lot	SPA #9	SP/ Park View District &Historic Downtown District

I. AESTHETICS

Significance Criteria and Impact Analysis

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 that would adversely affect day or nighttime views in the area.

a. b. c. Scenic Vistas/Scenic Resources/Visual Character or Quality

No Impact. As identified by the Open Space/Conservation Element of the City of Escondido General Plan, the project site and immediately surrounding area does not contain significant scenic vistas or significantly prominent topographical features. The property is not located on a ridgeline and does not include trees, rock outcroppings or historic buildings within a state scenic highway. The proposed school would not block views toward any prominent topographical features or affect a ridgeline. The existing visual character of the site would

be maintained because the high school proposes to occupy existing buildings without modifying the existing scale, mass or height of the two buildings.

d. Light and Glare

Less than Significant Impact. The primary sources of light would be from on-site parking, building and security lighting. The proposed school will utilize existing outdoor lighting fixtures with some potential modifications as well as additional lighting within all three sub-areas. Newly proposed lighting would be required to minimize the overflow of light onto off-site properties. Any changes in outdoor lighting would be subject to City of Escondido Zoning Code regulations. Section 33-713 of the Zoning Code includes the following regulations which would apply to the proposed project:

(a) Outdoor light fixtures installed after the effective date of this article and thereafter maintained upon private commercial, industrial or multiple family (over six (6) dwelling units) and other nonresidential uses (including churches, day care, convalescent use, schools, etc.) shall comply with the following:

(1) Only shielded low-pressure sodium outdoor light fixtures shall be utilized except as listed under subsection (b) of this section and Section 33-714 of this article;
(2) Low-pressure sodium fixtures within one hundred (100) feet of any signalized intersection shall be shielded and/or directed in such a manner so that the lighting from such fixtures does not interfere with established traffic signals.

(b) Time controls: all outdoor light fixtures which are not low-pressure sodium and searchlights installed and maintained after the effective date of this article upon new commercial, industrial or multi-family (over six (6) units) developments and other nonresidential uses shall be equipped with automatic timing devices so that such lighting is turned off between the hours of 11:00 PM and sunrise except when used for:

(1) Industrial uses where color rendition is required such as in assembly and repair areas, where such uses continue after 11:00 PM but only for so long as such operation continues.
(2) Recreational uses that are in progress at 11:00 PM but only for so long as such uses continue in operation.
(3) Signs and billboards of business facilities which are open to the public between the hours of 11:00 PM and sunrise but only for so long as the facility is open. (c) In addition to the provisions of this article, all outdoor light fixtures shall be installed in conformity with all other applicable provisions of the Escondido municipal code, this chapter and applicable Uniform Building and National Electrical Codes. (Zoning Code, Ch. 107, § 1072.20)

An exemption is provided in Section 33-714 of the Zoning Code for all shielded luminous fixtures and other types of lighting producing 4,050 lumens or less. Examples of lamp types that would comply with this limit generally include: 200 watt standard incandescent and less, 150 watt halogen (quartz) and less, 75 watt mercury vapor and less, 50 watt high pressure sodium and less, and 40 watt fluorescent and less. Compliance with the City's Outdoor Lighting Ordinance would ensure that impacts related to light and glare, resulting from the proposed project would be less than significant. Therefore, no mitigation is necessary.

II. AGRICULTURE AND FORESTRY RESOURCES

Significance Criteria and Impact Analysis

In determining if project impacts to agricultural resources are significant environmental effects, the City consults the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation.

The City refers to information compiled by the California Department of Forestry and Fire Protection concerning 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.

The effects of a project on agricultural and forestry resources including timberland are considered significant if the proposed project would:

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 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 12220(g)), timberland (as defined by Public Resources Code Section4526), 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; or*

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 forestland to non-forest use.*

a. Farmland Conversion

No Impact. The project site and surrounding areas have been established with urban uses for over a century. The property is mapped as Urban and Built-up Land by the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (SANGIS 2010) and the City of Escondido General Plan Update EIR (City of Escondido, 2012). Urban and Built-up Land is generally defined to include areas occupied by urban development categories such as residential, industrial, commercial, institutional, public administration, transportation, landfill and water/wastewater treatment facilities (CDC 2010).

As shown on Figure 4.2-1 (FMMP Resources) of the General Plan Update EIR, the project site is not considered to be Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance or Grazing Land (City of Escondido, April 2012).

Based on the described conditions, implementation of the proposed project would not have an impact of converting farmland to non-agricultural uses.

b. Agricultural Zoning/Williamson Act Contracts

No Impact. The proposed site is zoned as SP (Downtown Specific Plan). Figure II-2 (Permitted Use Matrix) of the Downtown Specific Plan does not list agriculture as a permitted use in any of the seven downtown districts. As illustrated on Figure 4.2-3 (Williamson Act Contract Lands) of the General Plan Update EIR, the site is not subject to a Williamson Act or other agricultural land contracts. Accordingly, no impacts to agricultural-related zoning or contract lands would result from project implementation

c. d. Forest Lands

No Impact. The proposed site is within an urbanized portion of the City of Escondido which does not support Forest Lands. As illustrated on Figure 4.2-4 (Potential Forest Resources) of the General Plan Update EIR, the site is not designated as having the "Potential for Forest Resources." Existing zoning does not provide for use of the site for Forest Lands including timberlands. No impacts to Forest Lands would result from project implementation.

e. Other Affects to Farmland

No Impact. Pursuant to the information described above under items a., b., c., d., the proposed project would not involve any changes to the existing environment that would result in the conversion of farmland to non-agricultural uses.

III. AIR QUALITY

Significance Criteria and Impact Analysis

Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Impacts would be significant if the project:

a. Conflicts with or obstructs implementation of the applicable air quality plan;

b. Violates any air quality standard or contributes substantially to an existing or projected air quality violation;

c. Results 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. Exposes sensitive receptors to substantial pollutant concentrations; or

e. Creates objectionable odors affecting a substantial number of people.

a. b. c. Conflicts with Air Quality Plans, Violation of Standards or Increase Pollutants

Less than Significant Impact. The project area is within the San Diego Air Basin (SDAB). Air quality at a particular location is a function of the kinds and amounts of pollutants being emitted into the air locally, and throughout the basin, and the dispersal rates of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by

inversions) and the local topography. The air basin currently is designated a state and federal non-attainment area for ozone and particulate matter. However, in the SDAB, part of the ozone contamination is derived from the South Coast Air Basin (located in the Los Angeles area). This occurs during periods of westerly winds (Santa Ana condition) when air pollutants are windborne over the ocean, drift to the south and then, when the westerly winds cease, are blown easterly into the SDAB. Local agencies can control neither the source nor transportation of pollutants from outside the basin. The Air Pollution Control District (APCD) policy therefore, has been to control local sources effectively enough to reduce locally produced contamination to clean air standards.

For long-term emissions, the direct impacts of a project can be measured by the project's consistency with regional plans to improve and maintain air quality. Local air-quality impacts are directly related to the number of vehicle trips and operation levels on adjacent streets and intersections. For planning purposes, the APCD assumed the City's General Plan designation of Urban in calculating the air quality impacts. Growth which is consistent with the General Plan Update such as the proposed school would not exceed the growth projections in the Regional Air Quality Strategy or California's State Implementation Plan (SIP). According to CEQA Guidelines, a project normally is considered to have a significant air quality impact if it violates any ambient air quality standard, contributes substantially to an existing or projected air-quality violation, or exposes sensitive receptors to substantial pollution concentrations.

Project-Related Impacts – Long-term emissions are related to the amount of vehicular traffic generated by the project. Based on the Classical Academy Charter High School Traffic Impact Analysis prepared by LLG, dated December 18, 2012, the Engineering Department indicated the anticipated additional trips generated from the project would not significantly impact the existing Levels of Service on the adjacent streets or intersections. Therefore, the anticipated daily emissions would not exceed local or SDAPCD daily emissions criteria. Since the project would not deteriorate the level of service on adjacent streets and intersections, and is not anticipated to exceed SDAPCD thresholds of significance, the project would not result in a significant impact to local or regional air quality. While the proposed project would have an incremental impact to basin-wide air-quality, the individual impacts attributed to the project are immeasurably small on a regional scale and would not cause ambient air-quality standards to be exceeded on a regional scale. Therefore, the project will not have a significant impact on air quality and no mitigation measures are required.

Construction-Related Emissions - Construction-related activities are temporary, short-term sources of air emissions. Sources of construction- related air emission include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by worker, delivery trucks and material-hauling trucks; and
- Construction-related power consumption.

Limited earthwork operations on a previously graded and level vacant lot to expand parking within Sub-Area C would include clearing, grubbing, and final pad formation. Proposed finished grading consists of approximately 330 cubic yards of cut and 10 cubic yards of fill with an export condition of 320 cubic yards. Construction equipment would be utilized for a very limited duration. Due to the relatively small amount of grading anticipated, no significant earthwork or diesel truck impacts are anticipated. Maximum daily emissions of NOx during construction periods are not projected to exceed City thresholds or APCD standards based on similar studies performed for similar size grading operations.

Construction activities also are a source of fugitive dust emissions which are a temporary impact on local air quality. Dust from grading within the proposed expanded parking lot and other site preparation would generate particulate matter emission. With appropriate use of grading and operation procedures (in conformance with APCD Best Management Practice for dust control), the project would not generate significant particulate matter or dust. The City of Escondido Grading Ordinance and erosion control requirements include provisions for dust control to reduce impacts to air quality during grading and construction activities. At a minimum, these ordinances and provisions require projects to perform regular watering and timely revegetation of disturbed areas to minimize the dust and airborne nuisance impacts to off-site receptors.

Emissions from construction equipment, worker and delivery and material-hauling trucks, and construction-related power consumption would be temporary and would result in an extremely small contribution to the SDAB and therefore would not result in a significant impact. Operations emissions come from area sources, including natural gas for space and water heating, and gasoline-powered landscaping and maintenance equipment, and from vehicle operations associated with the project. The proposed project would not significantly increase traffic volumes on local streets and intersections, as indicated in the Traffic/Transportation Section XVI, and the proposed project would not result in a substantial increase in the number of vehicles operating in cold start mode or substantially increase the number of vehicles on local roadways. Therefore, the project would not cause an unacceptable concentration of CO at any project-affected intersection.

Since the project would not adversely impact area roadways and intersections, the development of the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would have a less than significant impact on local and regional air quality. Individual impacts attributed to the proposed project are small on a regional scale and will not cause ambient air-quality standards to be exceeded, nor contribute to any adverse cumulative impacts.

d. Sensitive Receptors

No Impact. Sensitive receptors include day care centers, schools, retirement homes, hospitals, and medical patients in residential homes or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The two primary emissions of concern regarding health are carbon monoxide and TACs.

The California State Air Resources Board Land Use and Air Quality Handbook (2005) describes a number of air pollution source categories that should be sited away from sensitive receptors or mitigated. The recommendations of the handbook are considered advisory. As stated on Page 4, "Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, including housing and transportation needs, economic development priorities, and other quality of life issues." Several auto repair shops are located near the proposed school. The handbook does not recommend a separation distance between sensitive receptors and auto repair facilities. The City's General Plan Update Resource Conservation Element includes recommendations for sensitive receptors:

1. Avoid siting new sensitive land uses within 500 feet of a freeway,
2. Avoid siting new sensitive land uses within 300 feet of any dry cleaning operations that use perchloroethylene.
3. Avoid siting new sensitive uses within 300 feet of a large gas station.

The proposed school will not be in conflict with State or local policies governing sources of air pollution and sensitive receptors as the proposed school would not be located within the identified radius for the referenced uses.

e. Odors

Less than Significant Impact. During construction, diesel equipment operating at the site may generate some nuisance odors. However, due to the temporary and limited nature of the proposed construction and conformance with the General Plan Update, odors associated with project construction would not be considered significant.

IV. BIOLOGICAL RESOURCES

Significance Criteria and Impact Analysis

The effects of a project on biological resources are considered to be significant if the proposed project would:

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 (CDFG) or United States Fish and Wildlife Service (USFWS);

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 CDFG or USFWS;

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; Vegetation Communities and Sensitive Plant and Animal Species;

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native wildlife nursery sites;

e. Conflict with any local policies/ordinances that protect biological resources (e.g. tree preservation policy or ordinance) or;

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Naturally Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

a. Listed/Sensitive Species

No Impact. The entire site has been previously disturbed by urban uses and all native plant cover has been removed from these areas through past uses. As a result, no plant or animal species recognized as threatened or endangered by the U.S Fish and Wildlife Service or California Department of Fish and Game, or other sensitive species, as identified in local/regional plans/policies or regulations are known, or anticipated to occur within the proposed project site. In addition, no Resource Agency permits would be required for the proposed development since the project would not affect or remove any protected/endangered species.

A number of mature street trees are within the right-of-way adjacent to the property. These trees will not be removed as part of the project. Several non-native Palm trees will be removed on the vacant lot to expand the

number of parking spaces for students, faculty, teachers, parents and other visitors. These trees will be replaced in accordance with the requirements of the City's Tree Preservation Ordinance.

No listed/sensitive species will be impacted by implementation of the proposed project.

b. c. Riparian Habitats/Natural Communities and Federally Protected Wetlands

No Impact. The proposed site does not contain any riparian habitats, federally protected wetlands or other recognized sensitive natural communities. No riparian habitats/sensitive natural communities or federally protected wetlands will be directly or indirectly impacted by implementation of the proposed project.

d. e. f. Wildlife Movement, Local Policies & Habitat Conservation Plans/Natural Community Conservation Plans

No Impact. The urban/developed nature of the site and surrounding areas do not support wildlife movement or conflict with biological objectives contained in a Habitat Conservation Plan or Natural Community Conservation Plans or related local policy documents. As illustrated on Figure 4.4-1 (MHCP and MSCP Areas) of the General Plan Update EIR, the Downtown Specific Plan Area and the project site are not included in the City of Escondido MHCP Focused Planning Area or the County of San Diego MSCP Area.

The re-use of the site for the proposed school will not directly or indirectly impact wildlife movement or conflict with conservation planning efforts.

V. CULTURAL RESOURCES

Significance Criteria and Impact Analysis

The effects of a project on cultural resources are considered to be significant if the proposed project would:

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; or

d. Disturb any human remains, including those interred outside of formal cemeteries.

a. b. c. d. Historical Resources, Archaeological Resources, Paleontological Resources/Unique Geologic Features, Human Remains

No Impact. Based on a review of historical information, Sub-Areas A and B of the project site consisted of single-family homes from as early as 1892 through the late 1970's until the existing asphalt-parking lots were developed. Sub-Area C was developed with residential, commercial and retail buildings as early as 1892 through the late 1970's, when the existing office/warehousing building was developed. By the late 1980's, the existing production building was developed and has remained relatively unchanged to the present. According to Sanborn Records, a "Chinese Laundry" was identified on the western portion of Sub-Area C from at least 1892 through 1911. The southwest corner of Sub-Area C was labeled as "Car Sales" with three buildings labeled for "auto repair, machine shop and auto wrecking" from 1949 through 1962. Other former uses of the site include

John's Automotive from 1967-1977, Conley R Auto Specialists, Ogden Auto Repair, Lesley's Boat Center and the Times-Advocate, printing facility from 1963-1968. The current office building was built in 1979 with the production facility built in 1988.

Historical properties are generally considered to be at least 45 years old and have an integrity of setting, location, design, materials, feelings and association. Both of the existing structures are less than 45 years old. Neither of the two building are proposed for extensive alterations to the exterior elevations or demolition.

While the site is within the Commercial Core Historic District, the existing structures on the site: 1) do not have historical value because of their age and 2) will be retained with limited exterior modifications. As referenced in Table 4.52, of the General Plan Update EIR, the property is not included in a list of historic sites.

The previously graded/developed property is within an urbanized area. No known archaeological sites occur on the subject property. The site is not adjacent to a water source and there are no bedrock formations or rock outcropping that could have been used as milling surfaces. All native vegetation has been removed from the site and all sub-areas have been disturbed by prior grading activities. The developed project site is not characterized by unique paleontological resources or site or unique geologic feature. Lastly, the property does not have the potential to disturb human remains as records do not show past use of the site for the burial of human remains.

VI. GEOLOGY AND SOILS

Significance Criteria and Impact Analysis

The effects of a project on geology and soils are considered to be significant if the proposed project would:

a. Expose people or structures to potentially 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; or
    iv. Landslides.

b. Result in soil erosion or the loss of topsoil;

c. Be located on a geologic unit or soil that is unstable, or that is unstable, or that would become unstable as a result of the project; and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse;

d. Be located on expansive soil, as defined in Section 1802.3.2 of the International Building Code, creating substantial risks to life or property; or

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available to the disposal of wastewater.

a. Seismic Hazards

Less than Significant Impact. All of San Diego County is located within a Seismic Zone 4 designation. Zone 4 is the highest of four seismic risk zones, and is generally interpreted as an area with a 1 in 10 chance of experiencing a 0.4g peak ground acceleration level within the next 50 years. The project site is not located within or adjacent to any mapped State of California Fault-Rupture Hazard Zone (formerly known as Alquist-Priolo Special Studies Zone) or other known fault hazard designation. No known faults are located in the project site, with the closest active faults being an offshore segment of the Rose Canyon Fault Zone (approximately 15 miles west) and the Elsinore Fault (approximately 18 miles northeast). Based on the described conditions, the probability of seismic ground rupture and related effects occurring on site is considered low, and associated potential impacts would be less than significant. The previously graded site would not be subject to risk of landslides or liquefaction

b. Soil Erosion or Topsoil

Less than Significant Impact. As a previously graded site, topsoil (the top six to eight includes below the ground surface) has already been disturbed. Compliance with existing regulation such as the CBC and NPDES permit program would reduce potential impacts to soil erosion or the loss of topsoils from implementation of the proposed project to below a level of significance.

c. Soil Stability

No Impact. An insignificant amount of earthwork is being proposed in an area which is not associated with landslides or liquefaction. The proposed project would not result in a significant direct or cumulative impact associated with soil stability. Therefore, no mitigation is necessary.

d. Expansive Soils

No Impact. As shown on Figure 4.6-5, Expansive Soils, of the General Plan Update EIR, the site, does not contain expansive soils so no direct or cumulative impacts are anticipated.

e. Wastewater Disposal Systems

No Impact. Since the proposed project is not proposing to use septic systems or alternative wastewater disposal systems which would conflict with existing soil types, no significant impacts are anticipated. The proposed project would not result in a significant direct or cumulative impact associated with wastewater disposal systems.

VII. GREENHOUSE GAS EMISSIONS

Significance Criteria and Impact Analysis

The effects of a project on greenhouse gases are considered significant if the proposed project would:

a. Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

a. b. Generate Greenhouse Gas Emissions/Conflicts with Applicable Plan, Policy or Regulations

Less than Significant Impact. The proposed school would generate GHG emissions that would contribute directly and cumulatively to global climate change by short-term use of construction equipment and long-term as a result of automobile trips, water and energy consumption and solid waste generation. Global climate change refers to changes in average climatic conditions on Earth, as a whole, including temperature, wind patterns, precipitation and storms. Global temperatures are moderated by naturally occurring gases. These gases are referred to as greenhouse gases because they function like a greenhouse by allowing light in while preventing heat from escaping.

The State of California has not published thresholds of significance for measuring the impact of GHG from specific projects. CEQA Guidelines Section 15065.7 provides that "each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects." In August 2012, the City of Escondido prepared "Greenhouse Gases Emissions CEQA Thresholds and Screening Tables" which targets reducing GHG emissions within Escondido by 15% below existing levels by 2020.

Although the City's Climate Action Plan is still under review and has not yet been adopted, a standard of 2,500 MT CO2e emissions per year value can be used as a guide to define small projects. According to Appendix B (Sample Project Sizes by Land Use Category That Generate Less Than 2,500 MT CO2 E Per Year), a newly constructed high school consisting of 103,000 square feet of interior space would reach this threshold. The contribution to GHG emissions from the proposed public charter high school would be negligible because: (1) existing buildings are being re-used with limited improvements, (2) the school is currently operating in proximity to the site and (3) the potential amount of MT CO2 E per year would be far below the City's threshold for small projects.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The site was the subject of a Phase I Environmental Site Assessment prepared by EnviroApplications, dated December 14, 2012. A copy of the report can be found in the project case file (PHG 12-0023) located at the City of Escondido Planning Division. The objective of the study was to perform appropriate inquiry into the past ownership and uses of the subject property consistent with good commercial or customary practice as outlined by the ASTM in Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-05. The purpose of the study was to identify, to the extent feasible, adverse environmental conditions (including RECs) of the subject property that potentially have and/or may cause an adverse environmental impact to the subject property. The term recognized environmental condition (REC) is defined by ASTM E 1527-05 as:

> "The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum product into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws."

The term does not include de minimis conditions, which generally do not present a material risk to human health and would not likely be subject to enforcement action if brought to the attention of governmental agencies. An example of such a de minimis condition would be the engine oil stains typically present on the pavement surfaces of parking spaces due to various types of minor leaks from parked vehicles.

The ESA consisted of a visual reconnaissance of the subject property, collection of a current set of photographs; review of historical aerial photographs, maps and city directories, interviews, obtaining and reviewing available agency records, and review of a current Environmental Data Resources, Inc. Radius Map Report (EDR Report).

Significance Criteria and Impact Analysis

The effects of a project on hazards and hazardous materials are considered to be significant if the proposed project would:

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, substance, or waste within on-quarter mile of an existing or proposed school;

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

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 impacts would occur if the project results n safety hazard for people residing or working in the project area;

f. For a project within the vicinity of a private airstrip, the project results in a safety hazard for people residing or working in the project areas;

g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or

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.

a. Transport, Use and Disposal of Hazardous Materials

Less than Significant Impacts. Historical research indicates that the subject property was originally rural, residential land in an agricultural setting (cultivation of row crops and nursery plants) until approximately 1947 when a machine shop was constructed in the southwest corner area. A used car lot, wrecking yard and shop and an auto repair shop were subsequently constructed adjacent to the machine shop building. The machine shop and auto repair shop buildings were present until at least as recently as 1980 (based on historical aerial photos). They were subsequently demolished to make way for an asphalt-paved parking lot. During the demolition of the buildings and ensuing grading for the parking lot, no subsurface release of engine oil or other

automotive fluids was discovered in that portion of the subject property. Based on the available evidence, the former presence of the laundry shop, automotive related businesses and nursery in the western portion of the subject property along South Kalmia Street and Valley Parkway do not qualify as a REC of the subject property.

The site has operated as a newspaper office, printing press and distribution facility since the mid- 1970s. Printing press operations can have the potential for surface and subsurface exposure to petroleum-based hydrocarbons present in the cleaning solutions, blanket washes and coolant solutions. Inks made prior to the late 1980s were petroleum based-materials. Most inks in use today at newspaper printing operations are soy-based inks, which were reportedly used at the subject site.

The site is listed as a Resource Conservation and Recovery Act (RCRA) small quantity hazardous waste generator (SQG) for D001, D018, D039, and D040 hazardous wastes used in the printing press operations. The site is listed with the San Diego County HMMD as having a Commercial Print Shops business category permit for a parts washer, waste oil and mixed oil (press), black ink, sodium metasilicate pentahydrate 10% mita chem, unspecified oil-containing waste (absorbent pads), paint sludge, propane gas (fork lift), surfactant solution, lube oil, potassium hydroxide Kodak developer, and press room blanket wash spirits. At the time of the site reconnaissance, the printing operations had ceased and the printing press had been removed from the site, along with most of the other production-related equipment. The remaining equipment was in the process of being dismantled.

The results presented in this ESA Report indicate that:

- No evidence of any potential adverse environmental conditions, including RECs per ASTM International Standard E1527-05, was found to exist in association with the subject property.

- Investment Motorcars and Brecht BMW, formerly located on the northern portion of the subject property, was listed on the HIST UST, LUST, HMMD and SWEEPS facility databases. Based on a review of the HIST UST, HMMD and SWEEPS listings, the facility was equipped with three 550-gallon USTs containing unleaded motor vehicle fuel, diesel, and waste oil, respectively. The USTs were installed in 1964 and were single-walled steel types. The USTs were reportedly removed in 1986 and 1987. Based on a review of the LUST database listing, a waste oil release was discovered on June 8, 1987, which reportedly impacted the subject property's soils only. The status of the LUST release case is closed as of October 4, 1988. Based on the closed-LUST case listing, the waste oil release associated with the former Investment Motorcars and Brecht facility represents a historic REC of the subject property.

No known environmental release sites located either hydrogeologically up or immediately cross- gradient of the subject property that qualify as a potential adverse environmental contaminant impact source condition to the subject property were identified in the EDR Report that was obtained and reviewed during the preparation of this ESA. No issues associated with the possible presence of lead-based paints or asbestos containing material (ACM) were identified. Building materials that were observed appeared to be in good condition. No additional environmental assessment is recommended by the Phase I Study prepared for the site.

The proposed secondary school will not require the routine transport, use, or disposal of hazardous materials.

Federal and state regulations exist to reduce hazardous emissions and hazardous material handling within one-quarter of an existing or proposed school. These include but are not limited to California Human Health

Screening Levels (CHHSL), which evaluates sites with potential human health concerns, and the California Energy Commission (CEC), which requires the preparation of environmental assessments prior to school siting.

In addition, Section 15186 of the CEQA Guidelines establishes requirements for school projects, as well as projects near schools to ensure that potential health impacts resulting from exposure to hazardous materials, wastes and substances are examined and disclosed in an environmental document. The same section notes that hazardous materials must also be considered a risk for those who attend or would be employed at the school. When a project is located within one-quarter mile of a school and involves the construction or alteration of a facility that might emit hazardous or acutely hazardous materials in a quantity equal to or greater than that specified in Section 25536(a) of the Health and Safety Code, the lead agency must consult with the affected school district regarding the potential impact of the project when circulating the environmental document and notify the affected school district in writing prior to approval of and certification of the environmental document.

The Department of Environmental Health (DEH) is also required to regulate Hazardous Materials Business Plan (HMBP) and chemical inventory, hazardous waste and tiered permitting, USTs and RMPs. If proposed developments would handle regulated substances subject to California Accidental Release Prevention (CalARP) requirements within one-quarter mile of an existing or proposed school, then the DEH requires completion of an off-site consequence analysis to determine, whether in the event of an accidental release, a potentially significant hazard would occur.

The City of Escondido General Plan Update addresses schools and hazardous materials. Adopted policies require the development of strict land use controls, performance controls, performance standards and structural design standards to protect the health and safety of the general public consistent with regional, state, and federal requirements. Compliance with the General Plan Update policies and federal and state regulations pertaining to hazardous materials within one-quarter mile of the school would ensure that direct and cumulative impacts would be below a level of significance.

b. Release of Hazardous Materials

No Impact. The proposed public charter school will not be emitting hazardous emissions or involve the handling of hazardous materials, substances or wastes in a significant quantity during site preparation, construction or site occupancy.

c. Emit Hazardous Waste Within One-Quarter Mile of a School

Less than Significant Impact. The proposed project will not emit hazardous waste. However, a number of sites which have a potential for hazardous materials usage are located within one-quarter mile of the proposed high school site. Compliance with federal and state regulations pertaining to hazardous waste including the City's CEQA Guidelines would ensure the proposed project's risk associated with exposure to hazardous emissions would remain below a level of significance.

d. Hazardous Materials Site

No Impact. The proposed project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the Cortese List). The sites for this list are designated by the State Water Resources Control Board (LUST) the Integrated Waste Board (SWF/LS) and the Department of Toxic Substances Control. There are 21 CORTESE/HIST CORTESE facilities listed within a 1/2-mile search radius of the subject property:

Six sites are located at an equal or higher elevation than the target property:

- AAMCO Transmissions 260 North Juniper, NE 0.046 mi., is a former LUST Cleanup Site with a status of Completed - Case Closed (2008). The site had a RCRA-SQG violation in 1992 that they achieved compliance for in 1997 and had a permit (General Auto Repair Wastes) with the San Diego County HMMD that is listed as inactive, but had several violations for labeling and recordkeeping. In addition, the site is also listed on FINDS, SLIC, HIST UST, SWEEPS UST, and HAZNET because of these site activities.

- Action Car Wash, 410 E Valley Pkwy, ENE 0.153 mi., is a former gasoline LUST Cleanup Site that was closed by San Diego County SAM in 2011. In addition, the site is also listed on HIST UST and HAZNET because of these site activities.

- San Diego Glass & Paint Company, 404 E Grand Ave, E 0.177 mi., is a former LUST site (Stoddard solvent/mineral spirits) that was closed by San Diego County SAM in 1993. The site is also listed on HIST UST and SWEEPS UST for a 1,000-gallon UST.

- Proposed Parking Lot/City of Escondido, 137 Valley Parkway, E 0.220 mi., is a former gasoline LUST site closed by San Diego County SAM in 1998.

- Palomar Pomerado Health Care, 100 Valley Blvd., E 0.220 mi., is a former LUST Cleanup Site (soils-only kerosene release) with a status of Completed - Case Closed (1990).

- Madison Square Partnership, 488 Valley, ENE 0.253 mi., is a gasoline LUST site that was assessed in 1988, with monitoring started in 1997. No more recent regulatory information is provided.

Fourteen sites are located at a lower elevation than the target property, seven of which are listed as closed cases:

- City of Escondido, 208 N. Broadway, WSW 0.120 mi., Status: Completed – LUST Case Closed.

- Unocal SS#0099 (Former), 120-128 Broadway, SW 0.131 mi., is an open gasoline LUST site listed with the San Diego County SAM in 1998.

- Pacific Bell, 146 South Broadway, S 0.213 mi., is a former diesel LUST site closed in 2000 and is also listed on FINDS, HAZNET for waste oil, mixed oil, solvent mixtures, and other inorganic solid waste, and RCRA-SQG for D001 and D018 wastes.

- Battery Specialists, 551 Broadway, NW 0.244 mi., is a former gasoline LUST site closed in 1998.

- Dept. of Public Works, 101 Maple, SW 0.256 mi., is former gasoline LUST site closed in 2010.

- H.E. Barnthouse, 300 Grand Ave., SW 0.346 mi., is former gasoline LUST site closed in 1998. A soils-only release was closed under the San Diego County Voluntary Action Program (VAP) in 2002. The site is also listed on San Diego County SAM (VAP), HAZNET for waste oil, mixed oil, and aqueous

solution with total organic residues less than 10 percent, SLIC, and San Diego County HMMD with an inactive permit (UST removal only).

- Texaco, 209 Escondido, SSW 0.375 mi., is an open gasoline LUST site with the San Diego County SAM. The site is also listed on San Diego County HMMD with an inactive permit.

- Golden State Gasoline Inc., 225 W. Washington Ave., WNW 0.378 mi., is an open gasoline and diesel LUST site with the San Diego County SAM. The site is also listed on San Diego County HMMD with an active permit for service-station related wastes.

- City of Escondido, 470 Escondido, W 0.387 mi., is an open gasoline LUST site with the San Diego County SAM.

- United Oil Co., 303 S Escondido Blvd., SSW 0.417 mi., is a former gasoline and waste oil LUST site with cases closed under different responsible parties in 1986 and 1995. The site is also listed on HAZNET for soil from the site clean-up, hydrocarbon solvents, and unspecified organic liquid mixtures.

- Escondido Lincoln Mercury, 328 S. Escondido, SSW 0.438 mi., is a former gasoline LUST site closed in 2002 by San Diego County SAM. The site is also listed on FINDS, UST, SWEEPS UST, and San Diego County HMMD.

- U.S. Postal Service, 203 Orange, SW 0.454 mi., is a former gasoline LUST site closed in 1993 by San Diego County SAM. The site is also listed on SWEEPS UST, HIST UST, and San Diego County HMMD.

- Chevron/N Escondido Blvd/Sun Valley Fuel., 550 North Escondido Blvd., WNW 0.461 mi., is an active gasoline LUST site as of 1993, with no more recent regulatory information reported. The site is also listed on RCRA-SQG and FINDS.

- USA Gasoline, 411 S. Escondido, SSW 0.472 mi., is an active gasoline LUST site with San Diego County SAM (listed as TESORO #68134). The site is also listed on HAZNET.

The closed release case status, relative location, cross-gradient groundwater position, and distance of the CORTESE/HIST CORTESE listed facilities make it unlikely that they represent a potential environmental impact concern to the subject property.

e.f. Airports/Private Landing Strips

No Impact. The proposed project site is not located within two miles of a public airport or private landing strip. The closest public airports are located approximately 12 miles to the west (McCellan-Palomar Airport in the City of Carlsbad) and 12 miles to the east (Ramona Airport). A landing strip near Lake Wohlford is located approximately six miles northeast of the site. Implementation of the proposed school would not result in any impacts associated with airport-related safety hazards for students and employees at the proposed high school.

g. Emergency Response Plans

No Impact. The proposed project would not impact Emergency Response and Evacuation Plans. East Valley Parkway, which borders the site, is designated as an evacuation route. The proposed school would not include activities or structures that would impair implementation or interfere with any adopted emergency response or evacuation plans and no impacts would result.

h. Wildland Fire Risk

No Impact. The proposed site of the school is not adjacent to any wildlands. As noted on Figure 4.8-2, Wildlife Fire Risk, of the General Plan Update EIR, the property is within an area that is considered a moderate fire hazard. Based on the physical condition of the site, the proposed project would not result in any impacts related to wildland fire hazards.

IX. HYDROLOGY AND WATER QUALITY

Significance Criteria and Impact Analysis

A project specific Water Quality Technical Report (WQTR) dated December 19, 2012 was prepared by K & S Engineering, Inc. to assess potential water quality impacts pursuant to applicable NPDES and related City storm water standards. A copy of the full report can be viewed in the project case file (PHG 12-0023) located at the City of Escondido Planning Division. The project WQTR also includes evaluation of hydrologic issues including drainage patterns/directions, runoff rates/amount and hydromodification. The project WQTR is summarized below with other applicable information from the Preliminary Hydrology Study which also can be viewed in the project case file (PHG 12-0023) located at the City of Escondido Planning Division.

The effects of a project on hydrology and water quality are considered to be significant if the proposed project would:

a. Violate any 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 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 the course of a stream or river in a manner which would result in substantial increased 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 storm water 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 a federal Flood Hazard Boundary Map or Flood Insurance Rate Map or other flood hazard delineation map;

h. Place structures 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 as a result of the failure of a levee or dam; or

j. Inundation by seiche, tsunami or mudflow

a. Violations of Water Quality Standards,.

Less than Significant Impact. The California State Water Quality Control Board approved Order Number 2007-01 on January 24, 2007. The Order outlines the stormwater discharge requirements for municipal stormwater systems which drain development areas from watersheds within the County of San Diego, incorporated cities of San Diego County and the San Diego Unified Port District. The City of Escondido is one of the municipal co-permittees identified in the order and therefore subject to its requirements.

According to City of Escondido SUSMP Applicability Form included in the project's Water Quality Technical Report, the proposed project because of the limited improvements is only subject to Standard Stormwater Requirements.

Low Impact Development (LID) site design denotes a stormwater management and land development strategy that emphasizes conservation and the use of on-site natural features with engineered, small-scale hydrologic controls that closely reflect pre-development hydrologic functions. Projects address SUSMP objectives through the creation of a hydrologically functional project design that attempts to mimic the natural hydrological regime.

The following actions will be taken to maintain pre-development rainfall characteristics:

- Minimize Impervious Surfaces - Impervious areas are minimized by limiting the number of vehicular parking spaces and utilizing minimum driveway and aisle widths while maintaining sufficient space for vehicles and pedestrian maneuvering safety.

- Disconnect Discharges - This objective will be accomplished by having the parking lots drain to landscape strip areas.

- Conserve Natural Areas - The site contains no natural resources or areas to be conserved. Earlier disturbance of the site altered natural drainage courses.

- Landscape Design - Landscape irrigation systems shall be of an efficient design with respect to each landscaped area's specific water requirements. Maintenance of system installations on a regular and timely basis prevents over-watering and transport of silts, sediments, fertilizers and pesticides into the storm drain system. Rain shut-off devices or moisture sensors shall be integral to the operation of the irrigation system to avoid unnecessary irrigation during wet weather conditions. Installing flow reducers on shut-off valves controls loss of water due to unexpected pressure drops or other type of system compromise. Pest resistant, drought tolerant or native plans (per landscape architect plans) are used throughout the area to be graded.

- Water Efficient Irrigation - New irrigation systems shall comply with the Municipal Code and City Landscape Manual to reduce over-irrigation.

According to the City of Escondido SUSMP Applicability form, the proposed project is only subject to Standard Stormwater Requirements.

The proposed development will incorporate Low Impact Design (LID) by adding landscape strips throughout the site, disconnecting the runoff generated by the project.

b. Depletion of Groundwater

No Impact. Existing and future water service to the site is provided by the City of Escondido and the project would not withdraw groundwater, interfere with long-term groundwater recharge, acquifer levels or existing wells. No groundwater impacts from project implementation are anticipated.

c. d. e. f. Alteration of Drainage Patterns, Contribute Runoff, Degrade Water Quality

Less than Significant Impact. Grading associated with the proposed project is limited primarily to Sub-Area B where an existing parking lot will be redeveloped and new parking will be added. The reconstructed parking lot on Sub-Area B will include 0.57 acres (24,829.80 square feet) of impervious area and 0.23 acres (10,018.80 square feet) of landscape area. The proposed project will add 4,356 square feet of impervious area over the amount currently existing; therefore the project will be a standard project and hydromodification will not be required. Furthermore, the soils engineer has performed infiltration testing that indicates this project will infiltrate 3 inches/hr. helping to reduce the runoff that will be leaving the site.

The existing condition on Sub-Area B includes two basin areas that surface flow towards the north and southerly side of the property. Basin 1 consists of 0.07 acres that surface flow from an approximate ridge elevation of 653.30 towards the north side of the property to an elevation of 653.20; that will confluence with the runoff on Sherman Place. Basin 2 consists of 0.25 acres that surface flow from an approximate ridge level of 654.30 towards the south side of the property to an elevation of 652.80; that will confluence with the runoff on East Pennsylvania Ave. The total runoff produced from the on-site project 0.38 CFS for the 50 year storm event.

The proposed condition will have the same two basin areas. Basin 1 will consist of 0.03 acres; and Basin 2 will consist of 0.29 acres. Runoff produced by the proposed condition will sheet flow through landscape areas as a LID to mitigate the first flush and allow for some infiltration to reduce runoff before entering the public right-of-way. The total runoff generated before any infiltration happens is 0.93 CFS for the 50 year storm event.

The increase in runoff from the existing to the proposed condition is due to the different runoff coefficient. Furthermore an on-site soil testing has been performed to demonstrate the site will allow 3 inches/hr. of infiltration, reducing the amount of runoff leaving the site.

As described in the prior section, the proposed project with not substantially degrade water quality.

g. h. Flood Hazard Area

No Impact. The proposed project is not within a 100-year flood hazard area, consequently neither housing nor other structures will be subject to any impact.

i. Levee or Dam Failure

Less than Significant Impact. As shown in the Escondido General Plan Update FEIR, Figure 4.9-2 (Dam Inundation Areas), the project site has the potential to be impacted by the failure of dams at Lake Wohlford and Lake Dixon. However, both dams are subject to extensive design and maintenance requirements of the California Division of Safety of Dams, with the potential for a catastrophic failure at either site being extremely low. The two dams are inspected and maintained on a regular basis. Compliance with the County's Multi-Jurisdictional Hazard Mitigation Plan, the Lake Dixon and Lake Wohlford Emergency Action Plans, and implementation of General Plan policies would reduce impacts associated with dam inundation and flood hazards to a less than significant level.

j. Inundation from Seiche, Tsunami or Mudflow

No Impact. Due to the inland nature of the site, people or structures would not be exposed to hazards from a seiche or tsunami. Mudflow would not occur as grading is not proposed on steep slopes of 25% of greater. Therefore, no impacts are anticipated.

X. LAND USE AND PLANNING

Significance Criteria and Impact Analysis

The effects of a project on existing or planned land uses are considered significant if the proposed project would:

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; or

c. Conflict with any applicable habitat conservation plan or natural community conservation plan;

a. Physically Divide the Community

No Impact. The proposed school site is located in the 460-acre Downtown Specific Plan area. The Specific Plan illustrates the site as currently being situated within three districts: Park View (PV), Creekside Neighborhood (CN) and Historic Downtown (HD). The re-use of the existing buildings would not create any physical barriers between existing neighborhoods or otherwise divide or disrupt the community.

b. Conflict with Applicable Plans or Policies

No Impact. The City of Escondido General Plan designates the site as SPA #9 (Downtown Specific Plan). The Specific Plan zoning includes standards and regulations adopted as part of the Downtown Specific Plan which allows for a secondary school on the site with the approval of a Conditional Use Permit. From a land use perspective, no adverse impacts from the project are anticipated because the school would not conflict with the existing policies and objectives contained in the Land Use Element of the City's General Plan pertaining to the

intensity of development. Similarly, the proposed use would be consistent with the Land Use Matrix of the Downtown Specific Plan.

c. Conflict with Habitat Conservation Plan

No Impact. The proposed project would not conflict with applicable environmental plans since the subject site does not contain any sensitive species/habitat, or an area designated for preservation (as indicated on the MHCP/MSCP maps) or any other conservation planning area.

XI. MINERAL RESOURCES

Significance Criteria and Impact Analysis

The effects of a project on mineral resources are considered to be significant if the proposed project would:

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; or

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.

a. Regional or State Resources

No Impact. The project site, which has been previously developed as offices, a newspaper printing facility and associated parking, does not contain known mineral deposits of value. This conclusion is based on the described existing land uses, as well as review of the following sources: (1) the City General Plan (2012); (2) the CGS (formerly the California Department of Mines and Geology [CDMG]) Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region (1996); and (3) the CGS Mines and Mineral Resources of San Diego County, California (1963). Specifically, the General Plan designates the project site for urban uses but does not identify any related land use or zoning categories associated with mineral extraction or processing. As depicted on Figure 4.11-1 of the General Plan Update FEIR, Existing and Past Extraction Facilities, the site is not an active extraction facility nor is known to possess mineral resources. The project site and associated off-site areas are located within a Mineral Resource Zone (MRZ) designation of MRZ-4 in the referenced 1996 CGS report, which is defined as "Areas of no known mineral occurrences where geologic information does not rule out either the presence or absence of significant mineral resources." Finally, the referenced CGS San Diego County Report does not identify any known mineral deposits or mining activities within the project site and associated off-site areas. Therefore, the proposed project would not result in the loss of known valuable mineral resources or change the existing availability of such mineral resources, and no associated impacts would occur from project implementation.

b. Locally Important Resources

No Impact. Pursuant to the discussion above under Item a, no known locally important mineral resource recovery sites are delineated for the property on a local general plan, specific plan, or other land-use plans. Accordingly, no impacts would result from project implementation.

XII. NOISE

Significance Criteria and Impact Analysis

The noise-related effects of a project are considered to be significant if the proposed project would result in:

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 groundborne vibration or groundborne 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, significant impact would occur if the project exposed people residing or working in the project area to excessive noise levels; or

f. For a project within the vicinity of a private airstrip, if the project exposed people residing or working in the project area to excessive noise levels.

a. b. c. d. e. f. Noise Level Standards, Excessive Noise/Vibration Level and Ambient Noise Levels/Public Airport & Private Landing Strips

Less than Significant Impact (a, d)/ No Impact (b, c, e, f). Noise is generally defined as loud, unpleasant, unexpected or undesired sound that is typically associated with human activity and that interferes with or disrupts normal activities. The human environment is characterized by a certain noise level which varies by location and is referred to as ambient noise. As noted on General Plan Update FEIR Table 4.12-4, Existing City of Escondido Noise Compatibility Guidelines, an exterior noise level of 60-70 CNEL is conditionally acceptable for schools. "New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design." An exterior noise level of 70-80 CNEL is normally unacceptable for schools, and above that standard is clearly unacceptable. The General Plan table also provides exterior noise standards for playgrounds which indicate that up to 70 CNEL is normally acceptable.

Figure 4.12-2, Future (2035) Noise Contours, contained in the General Plan Update FEIR illustrates Valley Parkway from Via Rancho Parkway to El Norte Parkway having an exterior noise exposure of 70-76 (dbA CNEL) at a distance of 25-55 feet. Appendix B to the General Plan Noise Report states the existing noise level at the nearest receptor is 71 (dbA CNEL) on the portion of Valley Parkway that is between Escondido Blvd to Juniper Street. In 2035, the noise is projected to increase to 76 (dbA CNEL). Neither existing nor projected noise contours shown in the General Plan EIR considers mitigation such as walls, berms or setbacks which decrease noise levels.

The proposed public charter high school includes an outdoor student court on the southeastern corner of the site near the intersection of East Valley Parkway and North Juniper Street. An eight-foot high solid wall, which

exists along East Valley Parkway, is proposed to remain with the re-use of the site for a school. The location and height of the wall is expected to reduce exterior noise levels in the courtyard by at least 10 dbA CNEL. This project feature results in the outdoor student court complying with exterior noise standards of the General Plan. A new courtyard area on the western side of Building C2 adjacent to East Valley Parkway would be enclosed by a new eight-foot high solid wall that would provide similar attenuation benefits for this outdoor gathering area.

Policy E. 14 of the General Plan Noise Element states that projects which increase noise levels by five dB or more should be considered as generating significant impacts noise impacts and should require mitigation. Noise from the normal daily activities associated with school within the campus and parking lots (such as vehicle traffic, outdoor recreation, school bells/exterior speaker systems and general parking lot noise from car doors and conversations) would intermittently occur during daylight hours, when there is typically less sensitivity to noise. While some noise may be audible to neighboring single-family and multi-family residents, the level would not increase to reach the noise element standard because the duration is rarely sustained long enough to affect one-hour averages. Implementation of the proposed project would not significantly increase noise levels in the project area.

Noise impacts from construction are a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses and the timing and duration of noise-generating activities. The most extensive construction activities will be conducted inside the south building. Construction on the site would not cause long-term impacts since it would be temporary; and noise levels generated by daily construction activities are expected to be consistent with the limitations established in the Noise Ordinance (Sections 17-234 and 17-238).

No pile driving or blasting with explosives is proposed. Therefore, no significant vibrations or groundborne noise would be associated with the proposed project.

No public airports or private airstrips are located within 2 miles of the proposed project site; thus, the project site would not be exposed to excessive noise from airport operations.

XIII. POPULATION AND HOUSING

Significance Criteria and Impact Analysis

The effects of a project on population and housing are considered to be significant if the proposed project would:

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; or

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

a. b. c. Induce Growth, Displace Housing or Population

No Impact. Re-use of the existing commercial buildings for a secondary school will not directly or indirectly induce population growth in the area nor cause a displacement of existing housing or people. The student population is already dispersed in residential areas throughout North San Diego County while attending the

existing school facility approximately one-third of a mile away. The site does not contain any existing dwelling units that would be displaced; and the proposal would not include new housing opportunities on the site.

XIV. PUBLIC SERVICES

Significance Criteria and Impact Analysis

The effects of a project on public services are considered to be significant if the proposed project would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 public services:

1. Fire Protection
2. Police Protection
3. Schools
4. Parks
5. Gas/Electric

a.1 Fire Protection

No Impact. The Escondido Fire Department has indicated their ability to continue adequately serving the proposed project site with respect to day-to-day fire suppression and EMS facilities/services. The area currently is served by Fire Station No 1, located at 310 N. Quince Street less than 0.75 mile from the project site. This places the site within the 7.5 minute initial response time for fire service established in the Quality of Life Standards for the Escondido General Plan. The change from offices/newspaper printing facility to a school would not create significant impacts for fire and/or emergency medical personnel.

a.2 Police Protection

No Impact. The Escondido Police Department currently responds to requests for police services at the project site. The Escondido Police Department has indicated their ability to adequately provide both normal and emergency response to both existing and new development within the Downtown Specific Plan Area. The proposed project would not affect emergency response times and evacuation plans.

a.3 Schools

No Impact. The proposed project would not increase demand for new school facilities by adding a new student population through construction of additional residential units. The proposed public charter high school expands educational facilities and services in the community.

a.4 Libraries

No Impact. The project would not result in an increase in population, and thus, would not generate an increased demand for library facilities. Therefore, no significant impacts to the City's library resources would result from the proposed project.

a.5 Gas/Electric

No Impact. SDG&E is currently providing gas and electric facilities to the project site. SDG&E expects to be able to serve the project without a major expansion of their existing power transmission facilities. Therefore, no impacts would occur from the proposed project.

XV. RECREATION

Significance Criteria and Impact Analysis

The effects of a project on recreational facilities and services are considered to be significant if the proposed project would:

a. 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; or

b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

a. Deterioration of Existing Park and Recreational Facilities

Less than Significant Impact. The nearest park to the site is the historic Grape Park located one block to the west of the project site. The proposed project does not include housing that would create additional demand for parkland from an increase in population. The school includes an outdoor student court and indoor physical education facilities. It is not anticipated the proposed project would result in a significant impact to existing recreational facilities.

b. Construction of New Recreational Facilities

No Impact. Implementation of the proposed project will not create additional demand requiring the construction of recreational facilities.

XVI. TRANSPORTATION/TRAFFIC

A Traffic Impact Analysis for Classical Academy Charter School, prepared by Linscott, Law and Greenspan, December 18, 2012, assessed the potential transportation/traffic impacts of the proposed re-use of the site for a secondary school. Included in this traffic analysis are:

- Project Description
- Study Area and Existing Conditions
- Analysis Methodology
- Significance Criteria
- Analysis of Existing Conditions
- Trip Generation, Distribution and Assignment
- Cumulative Projects Description
- Analysis of Near-Term Scenarios
- Analysis of Year 2035 Scenarios

- Access Assessment
- Parking Assessment
- Significance of Impacts and Mitigation Measures

A copy of the full report is included in the project case file (PHG 12-0023) located at the City of Escondido Planning Division.

Significance Criteria and Impact Analysis

According to the City of Escondido Environmental Quality Regulation (Article 47, Sec. 33-924, impacts are considered significant if the project:

a. Causes the level of service (LOS) of a circulation element street to fall below a mid-range of LOS "D" and/or adds more than 200 ADT to a circulation element street with a LOS below the mid-range "D" yet above LOS "F."
b. Exceeds, either individually or cumulatively, a level of service established by the county congestion management agency for designated roads and highways;
c. Results in a change of air traffic patterns, including either an increase in traffic levels or in a location that results in substantial safety risks;
d. Substantially increases hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);
e. Results inadequate emergency access; or
f. Results in inadequate parking capacity.

a. b. Levels of Service

Less than Significant Impact

Study Area

The following intersections and segments were included in the study area:

Intersections

1. Broadway (SR 78) / State Route 78 (Lincoln Parkway) (signalized)
2. Broadway (SR 78) / Pennsylvania Avenue (unsignalized)
3. Pennsylvania Avenue / Kalmia Street / Waverly Place (unsignalized)
4. Pennsylvania Avenue / Juniper Street (unsignalized)
5. Valley Parkway / Centre City Pkwy (signalized)
6. Valley Parkway / Broadway (SR 78) (signalized)
7. Valley Parkway / Kalmia Street (unsignalized)
8. Valley Parkway / Juniper Street (signalized)
9. 2nd Avenue / Centre City Pkwy (signalized)
10. 2nd Avenue / Broadway (SR 78) (signalized)

Street Segments

Broadway (SR 78)

1. Mission Avenue to Washington Avenue
2. Washington Avenue to Pennsylvania Avenue

3. Valley Parkway to 2nd Avenue

Pennsylvania Avenue

4. Kalmia Street to Juniper Street

Kalmia Street

5. Pennsylvania Avenue to Valley Parkway

Juniper Street

6. Pennsylvania Avenue to Valley Parkway

Valley Parkway

7. Escondido Boulevard to Broadway (SR 78)
8. Broadway (SR 78) to Juniper Street

2nd Avenue

9. Escondido Boulevard to Broadway (SR 78)

Existing Conditions

Street Network

The following is a description of the existing street network in the study area.

Broadway (SR-78) is classified as a Four-Lane Major Arterial on the City of Escondido General Plan Update Mobility Element. It is currently built as a four-lane roadway with a TWLTL median between Washington Avenue and Valley Parkway and south of Valley Parkway to 2nd Avenue there is no TWLTL within the study area. Bike lanes are not provided and parallel and angled parking is generally permitted along both sides of the roadway. Sidewalks, curbs and gutters are provided and the posted speed limit ranges between 30-35 mph.

Pennsylvania Avenue is an unclassified roadway on the City of Escondido General Plan Update Mobility Element. It is currently built as two-lane undivided roadway within the study area. Bike lanes are not provided and parallel parking is permitted intermittently along both sides of the roadway. Sidewalks, curbs and gutters are provided and no posted speed limit was observed in the study area.

Kalmia Street is an unclassified roadway on the City of Escondido General Plan Update Mobility Element. It is currently built as two-lane undivided roadway within the study area. Bike lanes are not provided and parallel parking is permitted intermittently along both sides of the roadway. Sidewalks, curbs and gutters are provided and no posted speed limit was observed in the study area.

Juniper Street is classified as a Four-Lane Collector on the City of Escondido General Plan Update Mobility Element. It is currently built as a two-lane undivided roadway within the study area. South of Valley Parkway, a TWLTL median is provided. Bike lanes are not provided and parking is permitted along both sides of the roadway. Sidewalks, curbs and gutters are provided and the posted speed limit is 30 mph.

Valley Parkway is classified as a Four-Lane Collector on the City of Escondido General Plan Update Mobility Element. It is currently built as three-lane one-way roadway in the westbound direction between Escondido Boulevard and Juniper Street within the study area. Bike lanes are not provided and parallel parking is permitted intermittently along both sides of the roadway. Sidewalks, curbs and gutters are provided and the posted speed limit is 35 mph.

2nd Avenue is classified as a Four-Lane Collector on the City of Escondido General Plan Update Mobility Element. It is currently built as a three-lane one-way roadway in the eastbound direction between Escondido

Boulevard and Juniper Street within the study area. Bike lanes are not provided and parking is permitted intermittently along both sides of the roadway. Sidewalks, curbs and gutters are provided and the posted speed limit is 35 mph.

Valley Parkway and 2nd Avenue serve as a bi-directional couplet surrounding the Downtown Core commercial district within the City.

Transit

In addition to staggered start and end times, approximately 25% of Classical Academy's students either use public transit or walk/bike. Another 20-40% of the student population carpool to the existing Woodward Ave site.

The Escondido Transit Center Station is located on West Valley Parkway just west of Quince Street, located less than one mile west of the Project site. The Escondido Transit Center Station is served by the light rail Sprinter system connecting Escondido to all westerly jurisdictions along the SR 78 corridor (San Marcos, Vista, and Oceanside). The Sprinter runs every 30 minutes in each direction Monday through Friday from approximately 4:00 AM to 9:00 PM with later trains on Fridays and Saturdays.

MTS Express Bus Route 810 (Escondido to Downtown) connects at the Escondido Transit Center Station. Route 810 runs as a home-to-work/work-to-home commuter service on weekdays only. NCTD Breeze local bus service Routes 305, 308, 350, 351/352, 353, 354, 353/357, 356, 358/359, 371, 388/389 all connect at the Escondido Transit Center Station.

A number of local bus routes serve the proposed site.

Proposed Trip Generation

The project is calculated to generate approximately 972 net daily trips with 59 inbound / 38 outbound net trips during the AM peak hour and 29 inbound / 58 outbound net trips during the mid-day peak-hour. Since the existing North County Times building is currently generating traffic onto the roadway system (225 ADT with 32 AM peak hour trips), these trips have been removed from the expected charter school trip generation to reflect a net increase in traffic with the development of the Project site.

PROJECT TRIP GENERATION

Land Use	Size	Daily Trip Ends (ADTs) [a]		AM Peak Hour				Mid-Day Peak Hour			
		Rate	Volume	Rate	In:Out Split %	Volume In	Volume Out	Rate	In:Out Split %	Volume In	Volume Out
Charter High School	700students [b]	1.71/student	1197	—	—	—	—	—	—	—	—
	300students [c]	—	—	0.43	68:32	88	41	0.29	33:67	29	58

Existing Site Land Use [d]	100employees	2.25/employee	(225)	14%	9:1	(29)	(3)	—	—	—	—
Net Trip Generation			972	—	—	59	38	—	—	29	58

Footnotes:

a. ADT = Average Daily Traffic.
b. Total enrollment consists of 700 students throughout the day. Therefore, 700 students was used to develop the daily traffic generated by the Project using the ITE rate for "high school" of 1.71 ADT/student. Rate accounts for students, staff, and visitors, and various transportation modes.
c. During the AM peak hour and Mid-Day peak hour, 300 students arrive and depart the school, respectively. ITE rates for "high school" land use during the AM peak hour and Mid-Day peak hour of the generator (between 2:00-4:00 PM) were used in the trip generation calculations.
d. Daily trips for 100 employees include bi-directional daily trips plus an additional 25 two-way trips for employees leaving for lunch/errands. AM peak hour trips as a percentage of ADT calculated using SANDAG rate for "standard commercial office". No mid-day trip reductions were taken.

The trip distribution was based on zip code information provided by the applicant showing the distribution of students attending the existing Classical Academy Charter High School campus on Woodward Avenue.
Using the information from the zip code data, approximately 13% of students would be oriented from the north on I-15, 41% of students would be oriented to/from the west on SR 78, 7% would be travel via W. Valley Parkway to/from the southwest, 8% would be distributed to/from the south on I-15, and the remaining 31% would be east of I-15 traveling through the City of Escondido.

Cumulative Projects

Based on discussions with City Staff, nine projects were considered as part of the cumulative analysis:

- Springhill Suites by Marriott
- 350 La Terraza Blvd
- City Square Residential
- City Plaza Mixed Use
- Del Lago Academy
- Escondido Research and Technology Center
- Harmony Grove Village
- Harmony Grove Industrial Park
- Wal-Mart

Cumulative projects are estimated to generate approximately 45,977 ADT with 3,821 peak hour trips (2,352 inbound / 1,469 outbound) during the AM peak hour and 5,023 peak hour trips (2,311 inbound / 2,712 outbound) during the PM peak hour.

Significance Criteria

The City of Escondido uses the following criteria to evaluate if a traffic impact should be considered as significant:

- Significant impact is determined on a roadway segment or intersection with the addition of project traffic, in accordance with SANTEC guidelines.
    - Decrease in LOS to LOS Mid-D or worse.
    - Greater than 2% V/C (Volume / Capacity) ratio at roadway segments operating at LOS Mid-D or worse.
    - Greater than 2 seconds of delay at intersections operating at LOS Mid-D or worse.

- Mitigation measures are required when a roadway segment or an intersection is operating at a LOS Mid-D or worse and the project has a significant impact.

- The Quality of Life standards set out under the City of Escondido General Plan Update indicates that any project that adds 200 ADT or more to a roadway segment or intersection that operates at an LOS Mid-D, E or F should mitigate the impact or prepare an EIR for the City Council to approve over-riding findings.

- Based on the City of Escondido Zoning Ordinance, Section 33-924, "Coordination of CEQA, Quality of Life Standards and Growth Management Provisions," if the project adds more than two hundred (200) trips to a Mobility Element street with an LOS below LOS Mid-D, yet above LOS F, the project has a significant impact.

It should be noted that under Year 2035 conditions, the street segments analysis was performed using LOS "D" ((V/C ≥ 0.89) as the threshold for measuring the Project's significance. This methodology is consistent with the Escondido General Plan Update Final Environmental Impact Report (FEIR), adopted May 2012. LOS D is a threshold of acceptability utilized by other agencies and jurisdictions in the San Diego Region, and is supported by the regional SANTEC/ITE Guidelines. Thus, Year 2035 street segment LOS worse than LOS D (i.e., a V/C threshold greater than 0.89) is considered a significant impact. However, the V/C ratio used to quantify the change in roadway functions between pre- and post-project scenarios is calculated using the theoretical roadway capacity (LOS E/F value) in the denominator.

Analysis of Near-Term Scenarios

Existing + Project

All intersections are calculated to continue to operate at an acceptable LOS D or better with the addition of traffic from the project.

As stated in the full report, the study area segments are calculated to continue to operate at LOS C or better.

Existing +Cumulative Projects

With the addition of cumulative projects traffic, all intersections are calculated to continue to operate at an acceptable LOS D or better.

The study area segments are calculated to continue to operate at LOS C or better with the addition of cumulative projects traffic.

Existing + Cumulative Projects + Project

As described in the full traffic report, with the addition of cumulative projects and Project traffic, all intersections are calculated to continue to operate at an acceptable LOS D or better.

The study area segments are calculated to continue to operate at LOS C or better with the addition of cumulative projects and project traffic.

Analysis of 2035 Scenarios

The future regional traffic volumes were developed using the SANDAG Series 11 Regional Traffic Model. This model was used since it has been accepted by the City Council of Escondido as part of the Final Environmental Impact Report (FEIR) for the *Escondido General Plan Update*, adopted May 2012 and voter approved November 6, 2012, and it provides the most up-to-date land use and network assumptions information used to produce the North County San Diego Sub-Area Traffic Model. The scenario included in the Year 2035 SANDAG Series 11 traffic model contains the *General Plan Update* mobility network and land use.

Year 2035 Without Project

Study area segments are calculated to continue to operate at LOS D or better except for the following:

- Broadway between Valley Parkway and 2nd Avenue – LOS F
- Valley Parkway between Escondido Boulevard and Broadway – LOS E
- Valley Parkway between Broadway and Juniper Street – LOS E

Year 2035 With Project

With the addition of project traffic, the study area segments are calculated to continue to operate at LOS D or better except for the following:

- Broadway between Valley Parkway and 2nd Avenue – LOS F
- Valley Parkway between Escondido Boulevard and Broadway – LOS E
- Valley Parkway between Broadway and Juniper Street – LOS E

Since the Project does not increase the V/C on the LOS E segments by> 0.02 nor the LOS F segment by > 0.01, **no significant impacts** are calculated with the addition of Project traffic.

School Drop-off/Pick-up

Based on both the conservative drop-off/pick-up queuing assessment for 300 private vehicles and the more practical assessment of 144 private vehicles that would arrive at and depart from the site during the peak drop-off and pick-up periods, no significant vehicular queuing issues would arise due to the adequate stacking space of 500 feet proposed by the project. In order to ensure and enforce the adequate flow of traffic during these periods, it is recommended that the Traffic Management Plan contained in the traffic impact analysis be implemented.

Consistent with the Traffic Management Plan, the project includes:

- Creating a designated 250-foot stacking zone on the south side of Pennsylvania Avenue. This zone would occupy the existing curbside parking lane which would allow the continued flow of vehicles traveling on Pennsylvania Avenue in the eastbound direction past the project site.

- Posting "No Parking – Student Loading Only – Weekdays from 7AM-4PM" signs along Pennsylvania Avenue.

- Directing the flow of drop-off/pick-up traffic from the stacking zone to the entrance-only driveway on Pennsylvania Avenue exiting onto Juniper Street. Two lanes will be provided on-site.

- Complying with the Federal Highway Administration Manual on Uniform Traffic Control Devices (MUTCD) standards for all site and regulatory signage and markings.

- Establishing teacher/staff-attended drop-off/pick-up stations within the property to expedite the unloading and loading of students and enforce the constant flow of traffic.

- Requiring enforcement of the TMP during the peak periods for school traffic.

c. Air Traffic Patterns

No Impact. The proposed public charter high school does not have any responsibility for airport operations or is in proximity to an airport. Implementation of the project will not change air traffic patterns, increase air traffic levels or create substantial safety risks.

d. Hazardous Design Features

Less than Significant Impact. The proposed project is not proposing to re-design any of the existing roadways (East Pennsylvania Ave, North Juniper Street, Valley Parkway or North Kalmia Street). As described in the Section XVI, Transportation/Traffic, a Traffic Management Plan will be implemented to ensure that drop-off/pickup traffic does not interfere with traffic movement. Features included in the Traffic Management Plan include designated stacking zones, signage, management of vehicles entering and exiting parking lots and enforcing peak-hour management conditions.

The proposed school will not be introducing any new uses such as farm equipment that would be incompatible with the existing circulation network.

e. Emergency Access

No Impact. The main portion of the campus is surrounded by city streets on four sides which facilitates emergency vehicle response. No significant effects are anticipated from the proposed re-use of the existing buildings.

f. Inadequate Parking Capacity

Less than Significant Impact. The Project proposes to provide 201 parking spaces for the 700-student charter high school. In order to confirm the proposed parking supply would efficiently serve the Project, a review of the City of Escondido's parking code and parking codes for other nearby jurisdictions was conducted for comparison purposes.

The City of Escondido Municipal Code provides parking ratios for various land use types in order to provide a unified set of standards for public and private parking requirements throughout the City. The parking ratio for a high school is 0.33 spaces per student (or 1 space for every 3 students) plus 1 space per employee. Using the City's code, the Project would need to provide 284 parking spaces. As mentioned earlier in this report, a charter high school operates differently from a typical high school. Particularly, the Project offers staggered start and end times and is within close proximity to public transit with approximately 25% of students using transit or

walking/biking. In addition, it is expected that 20-40% of students would continue to carpool to school as they currently do at the existing Woodward Avenue site.

In order to confirm the parking rate required by the City of Escondido is comparable to those required of other similar jurisdictions, the traffic study reviewed the parking rates for the cities of Escondido, Irvine, Chula Vista, La Mesa, San Marcos, and San Diego. As shown in the parking assessment for the project, the project proposes to provide in excess of the average parking spaces required by several other jurisdictions. Although a deficit in parking spaces is calculated when compared solely to City of Escondido requirements, the City's requirements are 120 spaces more than the average indicating that the parking ratio required by Escondido is high as compared to other cities. It could therefore be concluded that adequate parking would be provided by the Project.

XVII. Utilities and Service Systems

Significance Criteria and Impact Analysis

The effects of a project on utilities and service systems are considered to be significant if the proposed project would:

a. Exceed wastewater treatment requirements of the applicable 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 storm water 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 resource or new or expanded entitlements needed;

e. Result in a determination by the wastewater treatment provides 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 capacity to accommodate the project's solid waste disposal needs; or

g. Comply with federal, state and local statues and regulations related to solid waste.

a, b, e. Sewer Service

Less than Significant Impact. Existing 10-inch Escondido Wastewater Division sewer mains are located in East Pennsylvania Ave. and North Juniper Street. Service to the proposed secondary school would be from an existing 6-inch lateral. According to calculations for projected fixture counts, a secondary school of 700 full-time students and faculty would only require the need for a 4-inch sewer lateral. Wastewater from the project site is treated at the Hale Ave Resource Recovery Facility (HARRF), which has a treatment capacity of 18 million gallons per day. At present, HARRF receives an average daily flow of 15.6 mgd or approximately 75% of capacity. Peak flows from the new use would not require the installation of new or upgraded conveyance or

treatment facilities or exceed the wastewater treatment requirements of the San Diego Regional Water Quality Control Board.

Numerous federal, state and local regulations exist that reduce the potential for development to exceed the capacity of the wastewater treatment plant. These include: Federal Water Pollution Control Act, California Water Code, Porter-Cologne Water Quality Control Act, Water Conservation Projects Act, the City of Escondido Water Reclamation Plan, Escondido Local Drainage and Sanitary Sewer Fees and Escondido SSMP and SPRP. Additionally numerous policies of the City of Escondido General Plan Update promote water conservation efforts which reduces wastewater demand while also requiring that future growth be related to the adequacy and timing of wastewater treatment expansion.

b. d. Water Service

Less than Significant Impact. The site receives water services from the City of Escondido Utilities/Water Division. An existing 8-inch water main is located in North Juniper Street. An existing 4-inch water lateral provides service to the proposed school campus. According to projected fixture counts, a secondary school of 700 full-time students and faculty would only require the need for a 3-inch lateral. The use of the property for a school site would not require the construction or upgrade of existing water facilities.

The City of Escondido is a member of the San Diego County Water Authority which receives potable water from the Metropolitan Water District of Southern California. Growth such as the proposed secondary school which is consistent with the Downtown Specific Plan would not increase the demand for potable water beyond the adopted 2010 Escondido Wastewater and Water Department and MWD's Urban Water Management Plan projections.

c. Stormwater Drainage Facilities

Less than Significant Impact. See analysis contained with Hydrology-Water Quality, Section No. VIII.

f. g. Solid Waste

Less than Significant Impact. Escondido Disposal, Inc. (EDI) currently provides solid waste removal services for the Escondido area. EDI also operates a solid waste transfer station at their W. Washington Ave site where solid waste is consolidated into larger trucks and taken to a Class III landfill for disposal. Both landfill sites (Otay and Sycamore) are outside the City of Escondido. The project would include recyclable material collection bins to reduce waste transported to local landfills. Less than significant impacts would occur since EDI will continue to serve the site, the project will limit waste through recycling efforts and adequate capacity exists at landfills.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

The proposed project would not have a significant individual or cumulative impact to the environment. No significant biological resources exist on the site. Therefore, there will be no adverse effect on any animal or plant species. The project will not degrade the quality of the environment for plant or animal communities since the project will not cause fish and wildlife populations to drop below self-sustaining levels nor reduce the number or restrict the range of endangered plants or animals. The project will not materially degrade levels of service on the adjacent streets or utilities. Consequently, the project is not expected to have any significant impacts, either long-term or short-term, nor will it cause substantial adverse effect on human beings, either directly or indirectly.

MATERIALS USED IN PREPARATION OF THIS ANALYSIS

The following materials were used during the preparation of this document. The project-specific technical reports listed below are on file with the City of Escondido Planning Division.

Project Technical Reports

Phase I Report Environmental Site Assessment for Commercial Property 207 E. Pennsylvania Ave (EnviroApplications, Inc. - December 14, 2012)

Water Quality Technical Report For A Standard Project for Classical Academy High School (K& S Engineering, Inc. - December 18, 2012)

Preliminary Hydrology Study for Classical Academy High School (K&S Engineering - December 18, 2012)

Classical Academy High School Traffic Impact Analysis (Linscott, Law, Greenspan - December 18, 2012)

General References

1. City of Escondido General Plan, 2012
2. Escondido General Plan Update Environmental Impact Report, 2012
3. Escondido Zoning Code and Land Use Maps
4. Escondido Municipal Code
5. SANDAG Summary of Trip Generation Rates
6. City of Escondido:
    a. Public Works Department
    b. Engineering Division
    c. Traffic Division
    d. Building Division
    e. Fire Department
    f. Police Department
    g. Planning Division
7. Site Visits/Field Inspections
8. Project Description & Preliminary Information