

# Escondido Disposal Inc. Master Plan

## Final Mitigated Negative Declaration

SCH #2015061066  
City Project # PHG 15-0010/ENV 15-0005

August 2015

**Prepared for:**



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

**Prepared by:**



RECON Environmental  
1927 Fifth Avenue  
San Diego, CA 92101

## Comments Received on the Draft MND and Responses

All comments received on the Draft MND have been coded to facilitate identification and tracking. Each of the comment letters, forms, and emails received during the public comment period was assigned an identification number. These documents were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid the readers and each commenter, the comment letters and responses have been reproduced together on a single sheet of paper, with the numbered comment letter on the left side of the page and the corresponding numbered response on the right side of the page.

<b>Letter</b>	<b>Commenter</b>	<b>Date</b>
A	Scott Morgan, Director, State Clearinghouse	July 23, 2015
B	Megan Emslander, Environmental Scientist, CalRecycle	July 22, 2015
C	KariLyn A. Merlos, Supervisor, Local Enforcement Agency	July 23, 2015

Letter A



EDMUND G. BROWN JR.  
GOVERNOR

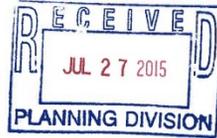
STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

July 23, 2015

Rozanne Cherry  
City of Escondido  
201 North Broadway  
Escondido, CA 92025-2798



Subject: CUP for Escondido Disposal Inc (EDI) Transfer Station / MRF Master Plan Expansion (City File No. ENV15-0005)  
SCH#: 2015061066

Dear Rozanne Cherry:

A-1

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 22, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1

This letter acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. Comment noted.

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2015061066  
**Project Title** CUP for Escondido Disposal Inc (EDI) Transfer Station / MRF Master Plan Expansion (City File No.  
**Lead Agency** ENV15-0005  
 Escondido, City of

**Type** MND Mitigated Negative Declaration  
**Description** A Conditional use Permit for the master planned expansion of the existing transfer station/materials recovery facility (TS/MRF) into the adjacent parcel to the north and reconfiguration of uses to provide additional sorting & improve recovery of recyclable material for more efficient operations. The project would provide a total of 216,476 sf of TS/MRF building area. No change to the current approved throughput capacity is proposed. The project would include renovation of several structures, a well as demolition & new construction of buildings, off-site storm drain improvements and construction of an anaerobic digester that would produce biogas to generate electricity for the facilities and/or provide CNG fuel for collection vehicles. The project would be constructed in 4 phases.

**Lead Agency Contact**

**Name** Rozanne Cherry  
**Agency** City of Escondido  
**Phone** 760 839 4536 **Fax**  
**email**  
**Address** 201 North Broadway  
**City** Escondido **State** CA **Zip** 92025-2798

**Project Location**

**County** San Diego  
**City** Escondido  
**Region**  
**Lat / Long**  
**Cross Streets** W. Washington Ave. between Metcalf St. and Rock Springs Road  
**Parcel No.** 228-250-1600, -1700, -7700, -7800  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** Hwy 78 & I-15  
**Airports**  
**Railways** NCTD Sprinter  
**Waterways**  
**Schools**  
**Land Use** Solid waste transfer station & materials recovery facilities / M-1 & M-2 / Light & General industrial

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Noise; Solid Waste; Toxic/Hazardous

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission

**Date Received** 06/23/2015 **Start of Review** 06/23/2015 **End of Review** 07/22/2015

Note: State to Date Fields are for informational purposes only and do not constitute a commitment by the State.

Letter B

California Environmental Protection Agency Edmund G. Brown, Jr., Governor  
**CalRecycle**  **DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**  
 1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027  
 P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

July 22, 2015

CLEAR  
7-22-15  
E

**RECEIVED**  
 JUL 21 2015  
 STATE CLEARING HOUSE

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

**Subject:** SCH No. 2015061066 - Draft Mitigated Negative Declaration for the Proposed Master Planned Expansion and Renovation of the Existing Escondido Disposal Inc. (EDI) Transfer Station and Materials Recovery Facility [SANCO Recycling, Facility No. 37-AA-0965 and Escondido Resource Recovery, Facility No. 37-AA-0906], San Diego County

Dear Ms. Cherry:

B-1 Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

**Project Description**

The City of Escondido Planning Division, acting as Lead Agency, has prepared and circulated an Initial Study and Mitigated Negative Declaration (IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed project is an expansion of the existing Escondido Resource Recovery facility located at 1044 W. Washington Avenue in the industrial area of Escondido in San Diego County. With the expansion the project site will increase from 6 acres to 11.1 acres. The two transfer processing facilities of Escondido Resource Recovery (37-AA-0906) and SANCO Recycling (37-AA-0965) will ultimately be combined into one solid waste permit facility through this project. The project does not propose any increase of tonnage in daily or annual allowances.

The proposed project consists of the following: Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI Transfer Station and Materials Recovery Facility (MRF) into the adjacent Mission Avenue parcel to the north and a reconfiguration of uses for more efficient operations. The overall throughput capacity of the facility would not change. The project would include renovation of several structures, as well as demolition and new construction. These improvements would be completed in phases, as follows:

Phase 1: Renovate a warehouse into bale storage, demolish a warehouse and rebuild a single stream MRF/self-haul/construction and demolition (C&D) area, construct a new maintenance canopy, and revise internal traffic flow.

  
ORIGINAL PRINTED ON 100% POST-CONSUMER CONTENT, PROCESSED CHLORINE FREE PAPER

B-1 This comment is an introduction to the comment letter and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

LETTER

RESPONSE

Ms. Cherry  
 EDI Transfer Station & Materials Recovery Facility  
 July 22, 2015  
 Page 2 of 3

Phase 2: Renovate the existing transfer station into mixed tipping, renovate the existing MRF, and add a new visitor entry.

Phase 3: Renovate the Mission Avenue office.

Phase 4: Demolish the Washington Avenue office and storage, and construct an Anaerobic Digester (AD). The AD would generate natural gas that would be utilized to convert the EDI fleet from diesel to compressed natural gas (CNG)-fueled vehicles.

The proposed parking would provide 106 parking spaces. At nighttime 24 parking spaces would be used for overnight truck parking.

Comments

B-2 CalRecycle's comments on the IS/MND and proposed project are listed in the table below. Specific section, page number and location of comments on issues of concern or items needing clarification are included in the table.

Section	Page and Location	Comment
B-3 Project Purpose	Pg. 3 3 <sup>rd</sup> paragraph	It is stated that "the processing capacity of the facility would remain the same as the existing conditions". Please explain exactly what conditions you are referring to.
B-4 Operations	Pg. 6 5 <sup>th</sup> paragraph	It is stated that "The Solid Waste Facility Permits (SWFP) for Escondido Resource Recovery & SANCO Services would be ultimately combined into one through this project". Please explain how both permits will be combined? How will the tonnage amounts of each facility be combined? How will this project affect the design capacity? State exact measurements and calculations of how separate permitted amounts will be combined.

B-5 Solid Waste Facilities Permits  
 The San Diego County Department of Environmental Health (as the Local Enforcement Agency (LEA) for San Diego County and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities such as transfer processing, including permitting and inspections. The permitting and regulatory requirements for transfer processing facilities are contained in Title 14 and Title 27 of the California Code of Regulations (14 or 27CCR). Please contact the LEA at 858-495-5799 to discuss the permitting requirements for this proposed project.

Conclusion

B-6 CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

B-2 Responses to specific concerns are addressed in response to comments B-3 and B-4 that follow.

B-3 The "existing condition" is that which is described in the Environmental Checklist Supplemental Comments (page 2) and comprises the facility as it is currently operating. Specifically, the ERR permit (for standard municipal waste) allows a maximum throughput of 2,500 tons per day; while the SANCO permit (for comingled/source separated materials) allows a maximum throughput of 723 tons per day.

B-4 The procedures for combining the permits would be determined by the LEA, in accordance with state guidelines. The applicant and City shall continue to consult with the LEA and acknowledge that close coordination will be required during this process. Additionally, for clarification, the MND contains strikeout/underline revisions which state that the combined permits would allow a maximum throughput of 3,223 tons per day (see MND page 7). While the increase area would increase the size of the facility, the intent is to allow for more efficient separation of materials and greater diversion from landfilling and not to increase the overall maximum daily throughput of 3,223 tons per day. The design capacity of the remodeled facilities will be developed as part of the Transfer Processing Report, which is required as part of the Solid Waste Facility Permit revision through the LEA.

B-5 Comment noted.

B-6 Comment noted. CalRecycle shall be included on the distribution list for copies of any subsequent environmental documents, public notices, or Notice of Determination (NOD) for this project. The NOD will also be sent to the State Clearinghouse.

LETTER

RESPONSE

Ms. Cherry  
EDI Transfer Station & Materials Recovery Facility  
July 22, 2015  
Page 3 of 3

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this project. Refer to 14 CCR, Section 15094(d) that states in part:

If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].

If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at [Megan.Emslander@calrecycle.ca.gov](mailto:Megan.Emslander@calrecycle.ca.gov).

Sincerely,



Megan Emslander, Environmental Scientist  
Permitting and Assistance Branch – South Unit  
Waste Permitting, Compliance, and Mitigation Division  
CalRecycle

cc: Virginia Rosales, CalRecycle

Anthony Torres, LEA  
San Diego County Department of Environmental Health  
[anthony.torres@sdcounty.ca.gov](mailto:anthony.torres@sdcounty.ca.gov)

Kari Lyn Merlos, Supervisor  
San Diego County Department of Environmental Health  
[karylkn.merlos@sdcounty.ca.gov](mailto:karylkn.merlos@sdcounty.ca.gov)



## County of San Diego

ELIZABETH A. POZZEBON  
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
SOLID WASTE LOCAL ENFORCEMENT AGENCY  
5500 OVERLAND AVENUE, SUITE 170, SAN DIEGO, CA 92123  
Phone: (858) 694-2888 Fax: (858) 495-5004  
www.sdcdeh.org

AMY HARBERT  
ASSISTANT DIRECTOR

Letter C

July 23, 2015

Rozanne Cherry, Principal Planner  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025  
[rcherry@ci.escondido.ca.us](mailto:rcherry@ci.escondido.ca.us)

RE: DRAFT MITIGATED NEGATIVE DECLARATION FOR ESCONDIDO DISPOSAL  
INCORPORATED MASTER PLAN CONDITIONAL USE PERMIT (ENV 15-0005/SCH NO: 2015081066)

Dear Ms. Cherry:

- C-1 The County of San Diego Department of Environmental Health Solid Waste Local Enforcement Agency (LEA) appreciates the opportunity to review and comment on the Draft Mitigated Negative Declaration (DMND) for the above project.
- C-2 The proposed project includes the expansion and reorganization of the footprint of the existing Escondido Disposal Inc. (EDI) Materials Recovery Facilities which include the Escondido Resource Recovery Transfer/Processing Facility and SANCO Recycling co-located at 1044 W. Washington Avenue, Escondido, CA 92025. EDI currently operates the site activities under two Solid Waste Facility Permits issued by the LEA and concurred upon by the California Department of Resources Recycling and Recovery. The combined maximum permitted throughput of the two facilities is 3,223 tons per day. This project does not include an increase to total throughput. Upon approval of this project by the City of Escondido, the applicant will need to submit an application to the LEA for a SWFP revision.
- C-3 The applicant should continue to consult with the LEA prior to submission to discuss the scope of the permit revision. Please note, although an Odor Impact Minimization Plan dated December 3, 2014 is included in Attachment 2 to the DMND, this document has not yet been submitted to the LEA for review.
- C-4 The LEA offers the following specific comment on the DMND for your consideration:  
Page 11 of the Preliminary Water Quality Technical Report (Attachment 6) states that: "Hazardous materials are not expected to be generated on-site..." However pages 3 and 4 of the DMND Environmental Checklist/Supplemental Comments refer to the construction of a Vehicle Maintenance Canopy and page 22 discusses the use of regulated hazardous materials in the operations and maintenance of the site and acknowledges the requirements for a Hazardous Materials Business Plan and related hazardous materials permit. It is also common for some hazardous wastes (oil, batteries,

1

- C-1 Comment noted.
- C-2 This comment is an introduction to the comment letter and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft MND. The applicant acknowledges the need to submit an application to the LEA for a Solid Waste Facility Permit (SWFP) revision, and clarification of this requirement has been added to the MND on page 8.
- C-3 The applicant acknowledges this comment and will continue to coordinate and consult with the LEA regarding the permit revision and combining. The applicant shall provide the Odor Impact Minimization Plan directly to the LEA for review.
- C-4 Although, the Preliminary Water Quality Technical Report states that "Hazardous materials are not expected to be generated on-site; . . ." it goes on to acknowledge that hazardous materials may be encountered on-site. Section VIII of the Environmental Checklist Supplemental Comments discusses the handling of the various hazardous materials.

The existing Household Hazardous Waste (HHW) canopy would remain on-site and unchanged. Further, the use of regulated hazardous materials in routine operations and maintenance of the site and fleet is an existing condition that would continue upon approval of the proposed project. However, the applicant acknowledges that hazardous waste such as oil or batteries occasionally enter the site as part of the waste load check process. The MND contains strikeout/underline revisions on page 22 which provide clarification of these items and discusses the handling, temporary storage, and disposal procedures that are currently in place and which would continue to be implemented by the proposed project.

LETTER

RESPONSE

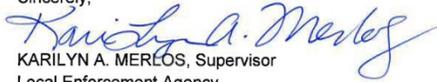
Ms. Rozanne Cherry

July 23, 2015

paint, etc.) to be discovered during the waste load check process. Ensure handling, temporary storage and disposal of hazardous wastes/hazardous materials are adequately described in environmental documents and site facility plans.

C-5 Please continue to include the LEA on the distribution list for copies of subsequent environmental documents, public notices and Notices of Determination for this project. If you should have any questions regarding this letter or the LEA permitting process and requirements, please feel free to contact me at (858) 495-5799 or by e-mail at: [karilyn.merlos@sdcounty.ca.gov](mailto:karilyn.merlos@sdcounty.ca.gov).

Sincerely,



KARILYN A. MERLOS, Supervisor  
Local Enforcement Agency

Cc: Virginia Rosales, CalRecycle  
Steve South, EDCC  
Rebecca Lafreniere, DEH

C-5 The LEA shall be included on the distribution list for copies of any subsequent environmental documents, public notices, or NODs for this project.



Environmental Checklist Form (Initial Study Part II)

- 1. Project title and case file number: Escondido Disposal Inc. (EDI) Materials Recovery Facility (MRF) Master Plan
2. Lead agency name and address: City of Escondido, 201 N. Broadway, Escondido, CA 92025
3. Lead agency contact person name, title, phone number and email: Rozanne Cherry, Principal Planner, 760-839-4557, Rcherry@ci.escondido.ca.us
4. Project location: 1044 W. Washington Avenue, Escondido, CA 92033 (APN 228-250-77 & APN 228-250-16)
5. Project applicant's name, address, phone number and email: Steve South, 1044 W. Washington Avenue, Escondido, CA 92033, 760.744.5615 x155, ssouth@edcodisposal.com
6. General Plan designation: General Industrial (GI)
7. Zoning: M-2
8. Description of project: (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
The proposed project includes a Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI materials recovery facility (MRF) into the adjacent Mission Avenue parcel to the north and a reconfiguration of uses for more efficient operations. The overall throughput capacity of the facility would not change. The project would include renovation of several structures, as well as demolition and new construction. These improvements would be completed in phases, as follows:
Phase 1- renovate a warehouse into bale storage, demolish a warehouse and rebuild a single stream MRF/self-haul/construction and demolition (C&D) area, construct a new maintenance canopy, and revise internal traffic flow.
Phase 2 - renovate the existing transfer station into mixed tipping, renovate the existing MRF, add a new visitor entry.
Phase 3 - renovate the Mission Avenue office.
Phase 4 - demolish the Washington Avenue office and storage, and construct an Anaerobic Digester (AD). The AD would generate natural gas that would be utilized to convert the EDI fleet from diesel to compressed natural gas (CNG)-fueled vehicles.
The proposed parking would provide 106 parking spaces. At nighttime 24 parking spaces would be used for overnight truck parking.
9. Surrounding land uses and setting (briefly describe the project's surroundings):
The project site includes the 1044 Washington Avenue parcel which contains the existing MRF, in addition to the 1021 W. Mission Avenue parcel with the Golfcraft building. Both parcels are occupied by industrial buildings, parking, and landscaping. There are no notable biological, cultural, or scenic aspects with the exception of the Golfcraft building as denoted in the RECON report.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement).
Local Enforcement Agency, Air Pollution Control District, County of San Diego Department of Health

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**DETERMINATION: (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

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

Rozanne Cherry  
Signature

6-19-15  
Date

Rozanne Cherry, Principal Planner  
Printed Name and Title

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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

**ISSUES:**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. <u>AESTHETICS.</u> Would the project:</b>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>II. <u>AGRICULTURAL RESOURCES.</u> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:</b>				
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 or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>III. <u>AIR QUALITY.</u> 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. Would the project:</b>				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IV. BIOLOGICAL RESOURCES: Would the project:**

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**V. CULTURAL RESOURCES.** Would the project:

- |   |                          |                                     |                                     |                                     |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?    | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?       | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                          | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**VI. GEOLOGY AND SOILS.** Would the project:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii. Strong seismic ground shaking?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii. Seismic-related ground failure, including liquefaction?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv. Landslides?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**VII. GREENHOUSE GAS EMISSIONS.** Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**VIII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IX. HYDROLOGY AND WATER QUALITY. Would the project:**

a. Violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters (Consider temperature, dissolved oxygen, turbidity and other typical storm water pollutants)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have potentially significant adverse impacts on ground water quality, including but not limited to, substantially depleting groundwater supplies or substantially interfering with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial/increased erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 and/or significant adverse environmental impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Cause significant alteration of receiving water quality during or following construction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Cause an increase of impervious surfaces and associated run-off?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Cause potentially significant adverse impact on ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Cause or contribute to an exceedance of applicable surface or ground water receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k. Create or exacerbate already existing environmentally sensitive areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
l. Create potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
m. Impact aquatic, wetland or riparian habitat?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
n. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
p. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
q. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
r. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>X. <u>LAND USE PLANNING.</u> Would the project:</b>				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XI. MINERAL RESOURCES.** Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land-use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XII. NOISE.** Would the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIII. POPULATION AND HOUSING.** Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XIV. PUBLIC SERVICES.** Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: |                          |                          |                          |                                     |
| i. Fire protection?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii. Police protection?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii. Schools?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv. Parks?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| v. Other public facilities?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XV. RECREATION.** Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVI. TRANSPORTATION/TRAFFIC.** Would the project:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**XVII. UTILITIES AND SERVICE SYSTEMS.** Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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?        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.** Would the project:

a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations {Zoning Code Section 33-924 (a) }?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Source of Information/Material Used in Preparation of this Analysis**

### **Attachments**

- Attachment 1: Air Quality Analysis (RECON 2015)
- Attachment 2: Odor Minimization Plan
- Attachment 3: Historic Building Survey of Golfcraft Building at 1021 West Mission Avenue, Escondido, California (RECON 2014)
- Attachment 4: Greenhouse Gas Analysis (RECON 2015)
- Attachment 5: Preliminary Drainage Report (April 2015)
- Attachment 6: Preliminary Water Quality Technical Report (April 2015)

### **Figures**

- Figure 1: Regional Location
- Figure 2: Project Location on an Aerial Photograph
- Figure 3: Existing Site
- Figure 4: Proposed Site Plan
- Figure 5: Anaerobic Digestion of Organic Waste
- Figure 6: Circulation Plan
- Figure 7: Grading Plan
- Figure 8: Landscape Plan
- Figure 9: Locations and Dates of Additions

### **Sources of Information**

1. Plan Set (Existing Site Plan, Existing Aerial Site Plan, Area Analysis, Overall Site Circulation, Truck Overnight Parking, Landscape Plan, Grading Plan, Building Elevations, and Overall Site Plan), JRM&A Architects, Engineers, Planners, 2014
2. Historic Building Survey of the Golfcraft Building
3. Preliminary Drainage Report
4. Water Quality Technical Report,
5. Odor Impact Minimization Plan for EDI, Edgar & Associates, December 4, 2014.
6. Air Quality Report, RECON 2015a
7. Historic Building Survey of Golfcraft Building at 1021 West Mission Avenue, Escondido, CA, RECON 2015b
8. Greenhouse Gas Report, RECON 2015c
9. Climate Action Plan, City of Escondido 2013
10. SanGIS, Soils Map. Access 2015 at <http://www.sangis.org/>
11. Solid Waste Information System, 2014  
SANCO Permit. Available at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0965/Detail/>  
Escondido Resource Recovery Permit. Available at:  
<http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0906/Detail/>  
Escondido Disposal, Inc. Permit. Available at:  
<http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0970/Detail/>
12. Escondido General Plan, City of Escondido 2012a
13. Escondido General Plan, Downtown Specific Plan and Climate Action Plan EIR, City of Escondido 2012b
14. Escondido Zoning Code and Land Use Map, City of Escondido
15. GEOTRACKER, RWQCB 2014
16. Ramona Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority 2011a
17. McClellan-Palomar Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority 2011b
18. Site Visit - Noise Measurements 2014
19. Site Visit – Photo Survey 2015
20. Project Description and Preliminary Information

# Acronyms

AD	Anaerobic Digestion
AB	Assembly Bill
ADT	average daily trips
BMP	Best Management Practices
CAP	Climate Action Plan
CalEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
City	City of Escondido
CNG	compressed natural gas
CO	carbon monoxide
CRHR	California Register of Historic Resources
C&D	construction and demolition
CUP	Conditional Use Permit
dB(A)	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
EDI	Escondido Disposal Incorporated
EPA	Environmental Protection Agency
ERR	Escondido Resource Recovery
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
HHW	household hazardous waste
L <sub>eq</sub>	hourly equivalent sound level
LID	Low Impact Development
LOS	level of service
MMRP	Mitigation Monitoring and Reporting Program
MTCO <sub>2</sub> E	metric tons of CO <sub>2</sub> equivalent
MRF	Material Recovery Facility
MSW	municipal solid waste
MTCO <sub>2</sub> E	metric tons of CO <sub>2</sub> equivalent
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrous oxide
OCC	Old Corrugated Container
OSHA	Occupational Safety and Health Administration
PI	Planned Industrial
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	particulates 2.5 microns or less in diameter
RAQS	Regional Air Quality Strategy
SANDAG	San Diego Association of Governments
SDG&E	San Diego Gas and Electric
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SO <sub>2</sub>	sulfur dioxide
TCM	Transportation Control Measure
TMDLs	Total Maximum Daily Loads
TPY	tons per year
V/C	volume to capacity
WQTR	Water Quality Technical Report

# MITIGATED NEGATIVE DECLARATION

(Draft)

## For Escondido Disposal Incorporated Master Plan

### CONDITIONAL USE PERMIT

(City File No. ENV 15-0005/PHG 15-0010)

## ENVIRONMENTAL CHECKLIST SUPPLEMENTAL COMMENTS

This Mitigated Negative Declaration (MND) consists of the attached Initial Study Environmental Checklist as well as the Environmental Checklist Supplemental Comments below. These documents will be used by the City of Escondido (City) to determine potential impacts associated with the Escondido Disposal Incorporated (EDI) Master Plan project (proposed project).

### INTRODUCTION

The proposed project includes a Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI facility (1044 W. Washington Avenue; assessor's parcel numbers [APNs] 228-250-1600, -1700, -7700) into the Golfcraft site (1021 W. Mission Avenue; APN 228-250-7800) located within the City of Escondido, California (Figures 1 through 4) and a reconfiguration of uses for more efficient operations. With the expansion into the Golfcraft site, the project site would increase from 6 acres to 11.1 acres. The master plan improvements include both renovation of existing buildings as well as demolition and reconstruction of buildings, off-site storm drain improvements, and construction of an anaerobic digester. The project would be completed over four phases.

As required by California Environmental Quality Act (CEQA) Guidelines Section 15105, public review comments from public agencies and the other interested parties may submit comments on the MND in writing during the 30-day public review period. The public review period for this project starts on **June 24, 2015** and ends on **July 23, 2015**. Comments shall be submitted to the following address by 5:00 on July 23, 2015:

City of Escondido  
Attn: Rozanne Cherry  
City of Escondido, Planning Division  
201 North Broadway  
Escondido, CA 92025-2798

Contact: Rozanne Cherry  
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A printed copy of this document and associated plans and/or documents are also available for review during the public review period at the address above during normal operation hours or online at [www.escondido.org](http://www.escondido.org). The City of Escondido General Plan Update (2012); Final Environmental Impact Report (2012); and Climate Action Plan are incorporated by reference. These documents are available for review at or can be contained through the City of Escondido Planning Division or on the City's website. The City will consider all comments received in conjunction with the MND in determining the approval or denial of the proposed project.

## EXISTING CONDITIONS

As indicated in Table 1, the project site is currently developed with a total of 175,743 square feet (see Figure 3). The northern parcel (Mission Parcel) (1021 W. Mission Avenue) currently includes the former Golfcraft office building and manufacturing plant building. The southern parcel (Washington Parcel) contains the existing EDI transfer station and materials recovery facility (MRF) (1044 W. Washington Avenue), which includes Escondido Resource Recovery (ERR) and SANCO Recycling. The facilities on the Washington Parcel include a mixed tipping floor, a self-haul area, and a mixed MRF line area in the warehouse portion, an office and bale storage building, and a household hazardous waste (HHW) canopy. Both parcels are almost entirely comprised of hardscape, with the exception of small strips of grass with streetscape trees along the street frontages and parking lot islands with trees and grass. The Mission Parcel is currently accessed from two driveways on Mission Avenue and the Washington parcel is accessed by three driveways on Washington Avenue.

**TABLE 1  
EXISTING ON-SITE USES**

Identified Space	Existing (square feet)
<b>Mission Parcel</b>	
Office	10,372
Manufacturing Plant Building	58,850
<i>Original Plant</i>	18,330
<i>Plant Addition</i>	40,520
Subtotal	69,222
<b>Washington Parcel</b>	
Transfer Station/MRF	104,955
<i>Mixed Tipping Floor</i>	36,798
<i>Self-Haul Area</i>	17,455
<i>Materials Recovery line/area</i>	34,040
Office	5,862
<i>Bale Facility and Bale Storage Area</i>	10,800
HHW Canopy	1,566
Subtotal	106,521
<b>TOTAL</b>	<b>175,743</b>

The site currently operates under two Solid Waste Facility Permits issued by the County of San Diego Department of Environmental Health in its role as the Solid Waste Local Enforcement Agency—the SANCO Recycling Permit and the ERR Permit. The ERR and SANCO permits are both for Large Volume Transfer/Processing Facilities. The current SANCO permit allows a maximum throughput of 723 tons per day and a maximum capacity of 960 tons per day. The Escondido Resource Recovery Permit allows maximum throughput of 2,500 tons per day and a maximum capacity of 5,249 tons per day. The ERR permit is intended to allow for standard municipal waste and the SANCO permit is intended to allow for comingle/source separated materials.

The area surrounding (see Figure 2) the project site is completely developed, and includes industrial and commercial uses. A Sprinter Operations Yard and EDI's collection truck fueling and maintenance yard are located south of Washington Avenue; an asphalt paving business (G. W. Weir) and an auto parts business (Fix Auto) are located directly west of the site; RCP Block and Brick, Mission Paint and Body auto repair, and a U-Haul truck rental business are located to the north of Mission Avenue; and another Mission auto repair lot and an AT&T telephone company office with truck yard are located directly east of the site.

## Project Purpose

The purpose of the project is to reorganize and expand the existing facility to provide for a more efficient and effective operations to achieve current state recycling objectives. The redesign, as shown in Figure 4, will allow for separation of self-haulers, i.e., private citizens dumping at the transfer station, from contracted haulers. The addition of a scale off

Mission Avenue would eliminate the current self-hauler “go-backs,” which is when a self-hauler is required to exit the site on Washington Avenue and reenter the site at the same point they originally entered to be weighed.

The additional floor space provided would not only separate the different types of users it would provide area needed to separate the various streams of materials, e.g., construction and demolition (C&D), green waste, recyclables, and municipal solid waste (MSW), and increase diversion. The project would also incorporate an anaerobic digester (AD), which would be capable of reducing green waste and MSW mass by 30 percent and creating biogas that can be used in power generation or in compressed natural gas fueled trucks. As discussed below, the diversion requirements are necessary to achieve current state recycling objectives.

As part of the reorganization of the site, the existing EDI facility would be expanded to include the site to the north. While this would increase the footprint of the facility, the processing capacity of the facility would remain the same as the existing conditions (see above). Specifically, the facility footprint is being expanded to meet the following state objectives:

- Assembly Bill (AB) 939: Requires each city or county plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities.
- AB 32: The Mandatory Commercial Recycling Measure included in this bill focuses on increased commercial waste diversion as a method to reduce greenhouse gas (GHG) emissions. It is designed to achieve a reduction in GHG emissions of 5 million metric tons of carbon dioxide equivalents. To achieve the measure’s objective, an additional 2 to 3 million tons of materials annually will need to be recycled from the commercial sector by the year 2020 and beyond.
- AB 341: The Commercial Recycling Requirements mandate that businesses (including public entities) that generate 4 cubic yards or more of commercial solid waste per week and multi-family residential with five units or more arrange for recycling services. Businesses can take one or any combination of the following in order to reuse, recycle, compost, or otherwise divert solid waste from disposal: self-haul, arrange for collection of source-separated recyclables, or subscribe to a recycling service.
- AB 1826: This measure requires businesses that generate 8 cubic yards or more of organic waste to start recycling it by April 2016, and also requires that local jurisdictions implement an organic waste recycling program to receive organic waste from businesses and multi-family developments. This measure includes a scaled approach that increases the organic waste recycling requirements for businesses in 2017, 2019, and 2020. This bill is intended to achieve the GHG reduction goals of AB 32.

## **Proposed Project**

The project proposes to expand the footprint of the existing transfer station to accommodate additional sorting and improve recovery of recyclable material in order to increase diversion of waste from landfills, as required by state regulations. The project does not propose any increase in permitted daily and annual throughput allowances. The project is planned to be constructed in four phases (see Figure 4 and Table 2) as discussed below. However, this phasing plan may ultimately be adjusted to address the future needs and priorities of the recycling facility.

Based on the plans (see Figure 4), Phase 1 would include, but not necessarily in this order: the demolition of approximately 40,520 square feet of the former Golfcraft manufacturing plant building, the renovation and reconfiguration of the original manufacturing building, construction of on-site circulation improvements, installation of new scales at the W. Mission Avenue and W. Washington Avenue access points, and construction of a maintenance canopy. The original Golfcraft manufacturing building would be used to house a 14,977-square-foot baling facility and temporary storage warehouse for bales. The demolished portion of the manufacturing plant would be replaced with a 74,436-square-foot building connected to the baling facility. This building would house a single stream MRF line, a commercial and recyclable tipping area, and a self-haul/C&D materials receiving area. A 4,615-foot maintenance canopy would also be constructed between the new building and the existing transfer station building.

Phase 2 would involve the renovation of the existing transfer station including the existing mixed MRF line and tipping area. While the activities occurring within these buildings would largely remain the same as the existing operation, the removal of the self-haulers and separation of the commercial waste and recyclables would allow for the existing tipping floor and mixed MRF line area to be expanded. The existing mixed tipping area would be expanded to 36,798 square feet and the mixed MRF line area would be expanded to 43,150 square feet. The existing Household Hazardous Waste (HHW) canopy would remain on-site and unchanged. Additionally, as part of Phase 2, an employee break room and visitors center would be constructed inside the existing transfer station.

During Phase 3, the project would renovate the former Golfcraft office building and reconfigure part of the manufacturing plant to provide 10,372 square feet of office space. During Phase 3, the existing EDI offices would be relocated to the former Golfcraft office building.

Phase 4 would include the demolition of the existing baling and bale storage area and EDI office building and construction of a 30,037-square-foot anaerobic digester (AD) facility.

The proposed project would provide for a total of 216,476 square feet of transfer station/MRF building area. As stated, the facility would not increase throughput; rather the increased footprint is necessary to accommodate the separate sorting lines required to meet the increasing state level diversion requirements.

**TABLE 2  
PROPOSED ON-SITE CHANGES**

Identified Space	Existing Area (square feet)	Proposed Change	Proposed Use	Proposed Area (square feet)	Phase
<i>W. Mission Avenue Parcel</i>					
Office	10,372	Renovate	Office	10,372	3
Golfcraft Plant	58,580	Renovate	Bale Storage	14,977	1
Original Plant	18,330	Demolish & Rebuild	Single-Stream MRF/ Self-Haul/C&D	74,436	1
Plant Addition	40,520				
		Build	Vehicle Maintenance Canopy	4,615	1
<i>W. Washington Avenue Parcel</i>					
Tipping Floor Area	36,798	Renovate	Mixed Tipping	36,798	2
Self-Haul Area	17,455	Build	Break Room/ Visitor Center*	4,420	2
		Build	Visitor Entry	525	2
MRF Line	34,040	Renovate	Mixed MRF	43,150	2
Bale Storage Area	10,800	Build	Future AD	30,037	4
Office	5,862				
HHW Canopy	1,566	No Change	HHW	1,566	-
<b>TOTAL</b>	<b>175,743</b>	<b>-</b>	<b>-</b>	<b>216,476</b>	<b>-</b>

AD = anaerobic digester

HHW = hazardous household waste

MRF = material recovery facility

C&D = construction and demolition

\*Not counted in the total building area as it is included within existing transfer station

The AD facility would also be a key component in meeting the state's waste diversion goals as well as supporting efforts of the state to reduce GHG emissions as the solid waste and recycling industry is at the nexus of increasing landfill diversion of food waste with mandated commercial recycling programs starting in 2016 in order to reduce GHG with the development of anaerobic digestion projects and increased compost use, while producing a carbon negative fuel to run their fleets. Other advantages of AD technology include: increased diversion of waste from disposal, reduced GHG

emissions from waste and operations, and energy production. The state has a goal to have 100 of these facilities operating in the state by 2020 and CalRecycle prepared and certified a program level EIR in 2011 (SCH No. 2010042100). Subsequent to the certification of the Final EIR, CalRecycle prepared *Guidance Document for CEQA Review of Municipal Organic Waste Anaerobic Digester Facilities in California*, August 2011, to provide guidance for tiering off the Final EIR.

The AD facility would be designed to process up to 31,200 tons of food waste and green waste per year. The processed waste would be converted into biogas (a gaseous product generated by the degradation of organic matter under anaerobic conditions). The biogas, a renewable energy source, would be cleaned and converted into biogenic compressed natural gas (CNG) to be used in the generation of power or for fueling vehicles. The undigested waste material (digestate) left over from the AD process would be reduced 30 percent by volume and would be compostable. The biogas from the AD facility is expected to be capable of generating 5.0 million kilowatt hours (kw/hr) per year, enough to power the entire EDI facility, or produce 420,000 diesel gallons equivalent (dge) per year of CNG, which could fuel 40 to 50 collection vehicles annually.

Various equipment would be used to process incoming waste and recyclables and to recover the recyclable materials at every opportunity. The vast majority of the equipment would be located within the buildings and be shielded from public view.

### Proposed Equipment

- Conveyor Systems – The reconfiguration of the mixed tipping and materials recovery operations would require additional conveyor systems some of which will carry material between buildings. The conveyor systems used for this application are fairly universal and are designed to handle single stream, C&D, municipal solid waste, compost, secondary plastic, and green/food waste.
- Drum Separator – The drum separator includes a recirculation fan, a separator with a rotating drum, and a connecting expansion chamber. In processing mixed waste, a drum separator is able to use controlled airflow to separate from heavy to very light materials in the waste stream. The separated material (up to 100 tons per hour) is separated automatically by the machine into bins for further processing or transport.
- Old Corrugated Container (OCC) Separator – An OCC separator uses triangular rotating discs to separate corrugated containers from other fiber, plastic and metal containers, and other debris via a bouncing wavelike action. The smaller material falls through while OCCs continue to travel up to another conveyor for recovery.
- Portable Mechanical Grinder – A portable mechanical grinder would be used to process smaller C&D material, green waste, stumps, and other materials. The portable mechanical grinder would likely be of the sort that is mounted upon a semi-tractor trailer. The grinders of the sort considered for this application typically consists of a 650 to 860 horse power hammer mill (up to 60 inches) which can process up to 85 tons of ground material per hour. The purpose of a hammer mill is to shred or crush aggregate material into smaller pieces by the repeated blows of spinning hammers. The mechanical grinder would be used on the transfer floor for processing green waste.
- Size Reducer – Similar to the OCC Separator, the size reducer utilizes triangular discs on a series of shafts that mesh together to shred single stream, municipal solid waste, C&D waste, wood waste, compost, and other materials. Size reducers would be included in the mixed MRF line.

## Operations

While the receiving of material is limited between the hours of 7:00 A.M. and 4:30 P.M., the existing facility currently operates 24 hours day 7 days a week and would continue to in the future under the project. The facility essentially operates in two 10-hour shift with cleaning and maintenance activities occurring in the hours between shifts. Table 3 provides a summary of the number of employees working on each shift to operate the facility.

The existing facility includes a mixed MRF line, which would continue operations at its current location within the existing facility. A mixed MRF line accepts a mixed solid waste stream and then proceeds to separate out designated recyclable materials through a combination of manual and mechanical sorting. The sorted recyclable materials may undergo further processing required to meet specifications established by end-markets while the balance of the mixed waste stream would be sent to the AD facility of a disposal facility such as a landfill. A mixed MRF subjects 100 percent of the waste stream to the sorting process, and can target a greater number of materials for recovery than can usually be accommodated by sorting at the source.

**TABLE 3  
EMPLOYEE SUMMARY**

Shift	Employees
<i>Day Shift</i>	
Commingled Recycling	30
Administrative	5
Transfer Drivers	30
Mixed Processing / C&D	25
Anaerobic Digestion	7
Transfer Facility	15
<b>Total</b>	<b>112</b>
<i>Night Shift</i>	
Commingled Recycling	30
Administrative	5
Transfer Drivers	0
Mixed Processing / C&D	25
Anaerobic Digestion	7
Transfer Facility	15
<b>Total</b>	<b>82</b>

A new single stream MRF line would be installed within the new building on the Mission Parcel. A single stream MRF line refers to a system in which all paper fibers, plastics, metals, and other containers are mixed in a collection truck, instead of being sorted by the depositor into separate commodities and handled separately throughout the collection process. In single stream, both the collection and processing systems are designed to handle this fully commingled mixture of recyclables, with materials being separated for reuse and baling.

In general the MRF line process involves dumping the incoming materials on a large tipping floor where a wheel loader is used to move the mixed recyclables to an inclined conveyor which feeds a presort conveyor. The loader also mixes incoming loads in order to help provide a consistent feed down the line. Sorting personnel then remove bulky items, garbage, and other throw-outs and open and remove plastic bags. From there, materials pass over a disk screen which separates OCC and then pass over a series of screens which separate out the containers and direct streams of material to sorting decks. On these decks, sorting personnel remove mixed paper and residues. The conveyors are equipped with variable speed controls to optimize the depth of material on the conveyors and the sorting speed. Approximately 25 to 30 sorters would work each shift, depending on the sorting line, along with a number of equipment operators. After sorting, the recyclable materials are usually baled and loaded onto trucks for transport to businesses which manufacture new products.

As with the MRF, the digester would use similar equipment to sort and transport organic materials into the digester. Within the digester, decomposition occurs in four phases: hydrolysis, acidogenesis, acetogenesis, and methanogenesis resulting in methane, carbon dioxide, water and digestate/residuals. The AD process is shown in Figure 5.

The Solid Waste Facility Permits (SWFP) for Escondido Resource Recovery & SANCO Services (which are issued by the San Diego County Department of Environmental Health (DEH) in its role as the Local Enforcement Agency (LEA)) would be ultimately combined into one through this project. Combining the SANCO existing permitted maximum throughput of 723 tons per day and the ERR maximum throughput of 2,500 tons per day will result in a total of 3,223 tons per day maximum throughput for the combined permit. The intent of the increased area is to allow for more efficient separation of materials and greater diversion from landfilling and not to increase the maximum throughput. The design capacity of the remodeled facilities will be developed as part of the Transfer Processing Report during the revision to the SWFP through the DEH-LEA.

### Circulation and Parking

The site includes three driveways on Mission Avenue and three driveways on W. Washington Avenue. The new internal circulation improvements would be a major component of the project to improve the efficiency of the recycling facility operations. Internal routes have been designed for transfer, shipping, HHW, collection, self-haul/C&D and employee/visitor traffic. Refer to Figure 6 for a detailed diagram of internal traffic flow.

As shown on Figure 6, each proposed area would have a dedicated parking lot to reduce internal traffic back-ups and blockages as well. The standard parking stalls would be focused on the northern and southern sides of the site near the driveways. Truck parking, including overnight truck parking, would be provided near the shipping dock, mixed tipping, mixed MRF, and along the internal HHW roadway loop. The total site parking would include 82 standard-size parking stalls and 40 semi-truck parking stalls.

### Grading and Utilities

The project would involve disturbance of 8.62 acres of the 11.1-acre site (Figure 7); however, very little actual grading would occur as the proposed site grades closely match the existing grade. The grading that would occur is primarily the result of the demolition of existing surface improvements which are a maximum of approximately 12 inches thick. The AD facility would require an 8-foot-deep percolate basement below the facility to collect and temporarily hold the digestate. Based on these estimates a maximum of 7,000 cubic yards of material would be removed from the site. This quantity includes both soils and demolished asphalt/concrete. Sliver cuts would occur along the western boundary in order to install the bioretention area; these cuts would be a maximum of 2 feet deep. No cut or fill slopes or retaining walls are proposed and the site grade is less than 10 percent slope.

Off-site improvements would include the removal of the current EDI office driveway and widening of the other two existing driveways along W. Washington Avenue. In addition, the project would install a 36-inch reinforced concrete pipe (RCP) for storm water conveyance in W. Washington Avenue. The RCP would extend along the right-of-way to connect downstream of Metcalf Street. Along the W. Mission Avenue frontage, the project would improve the existing driveway and construct a new driveway south of the existing driveway on W. Mission Avenue.

The City has water, sewer, and storm drain lines within the local roadways surrounding the project site. As with the existing development, the proposed project would include an on-site system that would connect to these existing off-site City utilities.

### Landscaping

The proposed Master Plan reorganizes the site, including the circulation, parking, and landscaping such that very little of the existing landscaping would remain. Existing turf along W. Mission Avenue would remain as shown on the Landscaping Plan (Figure 8). New xeric accent plantings (Mexican grass tree and red yucca) with pervious cobble and crushed gravel would be installed along the site entrances on W. Washington Avenue. Bioswale plantings would be provided along the western perimeter, interspersed with eastern redbud and acacia trees for screening purposes. Low water use plantings (deer grass, coral aloe, and trailing rosemary) would be included throughout the parking area. Overall, Master Plan improvements would decrease the impervious area by 29,991 square feet and increase the landscaped area by the same amount.

### Demolition and Construction

The project would be implemented over four primary phases. The project would be phased over a period of approximately 5 years. The initial phases would be focused on improving the recycling facility drop-off, sorting areas and

internal circulation first, then the office area and future AD area. This phasing may ultimately be adjusted to address the future needs and priorities of the recycling facility. The phases are summarized below:

*Phase 1*

- Renovate the original Golfcraft manufacturing plant into a bale storage facility
- Demolish the southern additions to the former Golfcraft manufacturing plant
- Construct a new building to house the single-stream MRF, self-haul and C&D tipping and processing areas
- Revise the internal circulation and install scales
- Construct the vehicle maintenance canopy
- Off-site storm water improvements

*Phase 2*

- Renovate the existing transfer station into a mixed tipping area
- Renovate the existing MRF (also includes construction of a break room/education room)

*Phase 3*

- Renovate the former Golfcraft office building

*Phase 4*

- Demolish the existing storage and office building on Washington Avenue
- Construct a new building and canopy for future AD
- Construct facilities for power generation or CNG fueling

Other Required Permits

- Revised SWFP through the LEA, including a Transfer Process Report
- Hazardous Materials Business Plan

## ISSUES:

### I. AESTHETICS

*a. Have a substantial adverse effect on a scenic vista?*

**No Impact.** The project site is visible from I-15 and the adjacent local streets, which consist of W. Washington Avenue and Mission Avenue. Due to the flat topography of the area and the intervening buildings, the site is not highly visible from other local roadways such as Metcalf Street or Rock Springs Road.

The General Plan (Resource Conservation Chapter; City of Escondido 2012a) identifies scenic vistas as views of “ridgelines, unique landforms, visual gateways and edges of the community.” The adjacent local roadways do not have scenic vistas due to topography and intervening structures. Motorists on Interstate 15 (I-15) have a more expansive view due to the raised I-15 elevation. Views from the I-15 area that include the project site have mountains and ridgelines in the distance. Redevelopment of the project site would not affect those views. The site is already developed with buildings that are partially visible from the I-15, and the proposed redevelopment would not significantly alter the site characteristic or affect the distant view of the mountains. Thus, the project would have no impact to a scenic vista.

*b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**No Impact.** The site is currently developed (see Figure 3), and scenic resources on-site consist of landscaping trees (palms, eucalyptus, etc.) and the original Golfcraft building (see Section V, Cultural Resources). Article 55, Section 33-1068 of the City’s Zoning Ordinance protects mature trees, and requires their preservation or, in the event that trees are to be removed, their replacement. Per this regulation, the project would be required to replace significant mature trees at a one-to-one ratio. The project would retain and repurpose the Golfcraft building. The site does not include any other scenic resources that are identified as significant by the General Plan (2012), such as “ridgelines, unique landforms, visual gateways and edges of the community.” The site is located approximately 1,000 feet east of I-15, but this segment of I-15 is not a state scenic highway.

*c. Substantially degrade the existing visual character or quality of the site and its surroundings?*

**No Impact.** The site is located in the urbanized, industrial area of the City and is completely developed with commercial and industrial uses. The project would reorganize the site, but the industrial character would remain similar to the existing conditions. Both the existing and proposed conditions include large warehouse-sized buildings with surface parking lots full of semi-trucks, trash trucks, and standard size vehicles. The project would include a decorative screen wall along W. Washington Avenue and the view of the office area along Mission Avenue would not substantially change from the existing conditions. Overall, the project would have no impact to visual character or quality.

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

**No Impact.** Article 35 of the City’s Zoning Ordinance, referred to as the Escondido Outdoor Lighting Ordinance, is intended to minimize unnecessary nighttime lighting and glare for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. In Section 33-713, the ordinance defines requirements for outdoor lighting, such as shielding and automatic timing devices. Shielding would also minimize nuisance light to neighboring land uses. The proposed project would comply with this ordinance and shield and direct light downward and away from property line to prevent light spillage onto neighboring properties and the night sky. Considering this and the fact that the site is currently developed with lighting, the overall change in lighting at the site would be minimal.

As the project would orient light down ward and would reduce lighting in non-work areas at night, potential glare impact along this Washington Avenue would not be substantial. The project would renovate the existing office, but no major changes in window area would occur. Thus, the project would have no impact related to substantial glare.

## II. AGRICULTURAL RESOURCES

*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:*

- a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?*
- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c. *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

**No Impact.** The project site is developed and does not include any active agricultural uses or agricultural resources. The site is not zoned for agricultural uses and is not adjacent to areas zoned for or in agricultural use. Therefore, the project would have no direct or indirect agricultural resource impact.

## III. AIR QUALITY

*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.*

*Would the project:*

- a. *Conflict with or obstruct implementation of the applicable air quality plan?*

**Less than Significant Impact.** The California Clean Air Act requires areas that are designated nonattainment of state ambient air quality standards for ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and nitrogen dioxide (NO<sub>2</sub>) to prepare and implement plans to attain the standards by the earliest practicable date. The San Diego Air Basin (SDAB) is designated nonattainment for ozone. Accordingly, the Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state standard for ozone particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) (but as noted, the California Clean Air Act only requires, in this case, a plan for ozone). The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the Transportation Control Measures (TCM), were most recently adopted in 2009 as the air quality plan for the region.

The stationary source control measures identified in the RAQS include maximum daily operational emission limits. RECON prepared an air quality analysis (RECON 2015a; Attachment 1) to determine the operational emissions generated by the project. Table 4 displays air quality emission generated by operation of the proposed project. Operational emissions shown in the Table 4 are the worst-case scenario (electricity or CNG production) for each individual criteria pollutant. As shown in the table, project emissions would be less than

the significance thresholds for all criteria pollutants including ROG and NO<sub>x</sub>. As such, the project would not affect the RAQs implementation and impacts would be less than significant.

**TABLE 4  
MAXIMUM DAILY OPERATIONAL EMISSIONS  
(pounds per day)**

Source	ROG <sup>1</sup>	NO <sub>x</sub>	CO	SO <sub>x</sub> <sup>2</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	1.4	2.9	13.7	<0.1	2.6	0.7
Area	5.6	0.7	0.6	<0.1	36.2	36.2
AD Facility	15.0	58.1	132.1	32.9	0.2	0.2
Total	22.0	61.6	146.3	32.9	38.9	37.0
Significance Threshold	55	250	550	250	100	55
Significant?	No	No	No	No	No	No

SOURCE: RECON 2015a.

<sup>1</sup>ROG and VOC are interchangeable in this context.

<sup>2</sup>Emissions calculated by CalEEMod 2013.2.2 are for SO<sub>2</sub>.

*b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

**Less than Significant Impact.** The project would generate air pollutants during both construction and operation. Thus, an air quality analysis of both of these project phases is provided below.

*Construction*

While the project construction may be phased, this construction air quality emission analysis is based on the worst-case immediate buildout of the project. Construction would include the proposed demolition, grading, renovation and construction as described in the project description. The project's construction emissions are presented in Table 5. As shown, worst-case emissions would be less than the thresholds for all criteria pollutants. Since construction would be phased, actual emissions would be less than those calculated. Construction impacts would be less than significant.

**TABLE 5  
WORST-CASE CONSTRUCTION EMISSIONS  
(pounds per day)**

Pollutant	Construction Emissions	Significance Thresholds
ROG	11.7	75
NO <sub>x</sub>	72.2	250
CO	57.8	550
SO <sub>2</sub>	0.1	250
PM <sub>10</sub>	7.5	100
PM <sub>2.5</sub>	4.1	55

*Operation*

The existing site is currently a source of operational pollutant emissions. The completion of the proposed project would increase daily operational emissions, as discussed under "Air Quality Plans" above. However, as the operational emissions would be less than the applicable threshold for all criteria pollutant, operational emissions would be less than significant.

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

**Less than Significant Impact.** The region is classified as attainment for all criterion pollutants except ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Nitrogen oxides and hydrocarbons (ROG) are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone. As discussed in Sections III(a) and III(b) above, project-emissions would be less than the significance threshold for ROG and NO<sub>x</sub>. Thus, impacts would be less than significant.

d. *Expose sensitive receptors to substantial pollutant concentrations?*

**No Impact.** A sensitive receptor is a person who is particularly susceptible to health effects due to exposure to an air contaminant. Examples of land uses which may have sensitive receptors include residences, schools, playgrounds, child care centers, churches, athletic facilities, retirement homes, and long-term health care facilities. As the site is located in an industrial/commercial area, the area adjacent to the site does not include sensitive receptors.

Operational emissions include CO and diesel particulate matter (DPM) emissions associated with vehicle traffic. The project would not change the throughput of existing EDI Recycling Facility. Thus, the project would not substantially affect the amount of traffic or the number of heavy trucks associated with the project. Therefore, CO and DPM would not increase compared to the existing condition. No impacts would occur.

The project AD facility may produce up to 420,000 diesel gallon equivalent (dge) of CNG per year. Under this scenario, the AD facility would fuel 40 CNG-fueled collection vehicles that would otherwise remain diesel fueled. Overall, the proposed project change from diesel to CNG vehicles would reduce vehicular CO emissions by 70 to 90 percent relative to the existing conditions. Thus, the project would result in beneficial air quality impacts, and would have no impact to sensitive receptors.

e. *Create objectionable odors affecting a substantial number of people?*

**Less than Significant Impact.** The existing EDI Recycling Facility currently collects mixed solid waste (MSW), recyclables, and green waste for processing and transfer. To reduce potential odors from organics, the maximum allowable hold time for all MSW, green waste, and food waste is restricted to 48 hours. If an odor is detected, the site operator investigates the source of the odor and determines whether the odor is travelling beyond the site and whether on-site practices could remedy the problem. Roll-up doors to waste handling and separation areas are closed when the facility is not in operation. The project would reorganize the EDI Recycling Facility. All existing odor minimization measures would remain in place at the existing facility and would be applied at the new facility. As such, the project would not result in increased odor from waste handling and separation areas.

The project would be operated in compliance with an Odor Impact Minimization Plan (Edgar & Associates 2014; Attachment 2). The AD facility would be completely enclosed and placed on a negative air flow to draw any potential odors inward. All exhaust air generated from AD operations would be treated using a biofilter system to control odors. Thus, the AD facility would not generate substantial odors and impacts would be less than significant.

CNG-fueled collection vehicles would replace diesel-powered collection vehicles. Thus, the project would reduce odors from diesel exhaust but potentially increase CNG exhaust odors. In the scenario where natural gas is compressed for use as a fuel for collection vehicles, CNG fuel would be treated by two air pre-treatment technologies prior to distribution to vehicles. First, an acid scrubber would remove ammonia from exhaust air generated from digester shutdown operations and in-vessel composting tunnels that would be optimized for the

removal of ammonia. After air is treated in the acid scrubber it would be moisturized in an automated humidifier to assure proper process conditions are maintained for biological oxidation. Thus, the CNG fuel would not be odorous and CNG fueled vehicles would not generate odors. Thus, under CEQA definitions the project operational emissions to sensitive receptors would be considered less than significant.

#### IV. BIOLOGICAL RESOURCES

*Would the project:*

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

**Less than significant with mitigation.** The mature trees on-site have potential biological value, as they may provide nesting opportunities. Raptor breeding is protected by the California Department of Fish and Wildlife Code, and migratory bird nesting is protected by the Migratory Bird Treaty Act. In accordance with these regulations, the following mitigation would be placed on any construction permits issued by the City for this project:

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

**BIO-2** If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

Implementation of these measures would ensure avoidance of nesting raptor and migratory bird impacts. Thus, biological resource impact would be less than significant with mitigation.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- 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?*
- d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

- e. *Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?*
- f. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**No impact.** The site is currently developed and includes buildings, hardscape, and landscaping. No native habitats or wetlands exist on-site.

## **V. CULTURAL RESOURCES**

*Would the project:*

- a. *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

**Less than Significant.** The site was previously graded and is currently developed. The existing buildings on-site were constructed between 1952 and 1995. Considering some structures are over 50 years old, a Historic Building Survey Report (RECON 2015b; Attachment 3) was conducted for the existing Mission Avenue building. The analysis below is based on that report, which determines resource significance based on California Register of Historical Resources (CRHR) evaluative criteria and the seven applicable City's Historic Resources Code (Article 40, sec. 33-794, Escondido Zoning Ordinances) criteria. In summary, the Golfcraft building is a significant historical resource but the project would have a less than significant impact because it would retain and reuse the original office building. The plant additions (Figure 9) added in between 1964 and 1980 are not a significant historical resource.

### Building History

The Mission Avenue building includes an original 1952 structure, as well as various add-ons completed throughout the years (see Figure 3). The original structure housed the Golfcraft plant that manufactured and sold golf equipment. The office portion of the original building is currently contemporary commercial concrete block with stucco exterior, flat roof, with two horizontal window bands and a door. Features include glass blocks, pilasters, and a red brick planter. The original warehouse is enclosed by additions with the exception of the northeast wall. The curved composition roof is supported by wooden bowstring trusses, and the original wall is concrete block with seven large windows.

The 2001 Escondido Historic Architecture Update Survey identifies the Golfcraft building as individually significant because of its association with the relocation of Golfcraft from the Midwest to the west coast. The site is also associated with Edward Woolley, who was a professional golfer. He owned and managed the Escondido Golfcraft facility since its opening and grew the business into 167 workers by 1965. The business was also responsible for technological advances; it was the first to develop fiberglass club shafts, a machine that analyzed golfers swing to determine the appropriate club, and a machine that replicates swings to test balls and clubs. Woolley retired in 1971.

### Significance Determination

CEQA

The Golfcraft building was determined to meet two of the four CRHR criteria. The site was considered to be associated with the lives of persons important to the nation or to California's past (Criterion B), as it is associated with Mr. Woolley who made a significant contribution to the development of the golf industry in the U.S. and California. The site also embodies a distinctive construction characteristic (Criteria C) since it represents Contemporary Commercial through its strong roofline, windows, and concrete construction. The site is not associated with events significant to Californian or U.S. history (Criterion A) and does not have significant prehistory or history information (Criterion D). Overall, the Golfcraft building is eligible for California

Register of Historical Places listing under Criteria B and C, and is therefore a significant historical resource under CEQA.

### City

Of the 13 City historical significance criteria, the seven potentially applicable to the building are analyzed below. A historic property must meet at least two of these criteria to be eligible for inclusion on the local register of historic places or be given historic landmark status. The Golfcraft building is eligible for listing on the Local Register of Historic Places under Criteria 1, 2, 4, and 5, as discussed below and detailed in the Historic Building Survey Report (RECON 2014b).

- 1 Resources that are strongly identified with a person or persons who significantly contributed to the culture, history, pre-history, or development of the city of Escondido, region, state, or nation.
  - The site meets criterion 1, as it was associated with Mr. Wooley between 1952 and 1971, the plant made significant golf-related technological advances on a national level, and brought the golf industry to Escondido.
- 2 Building or buildings that embody distinguishing characteristics of architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered.
  - While no information could be found regarding an architect associated with the design of the Golfcraft building, the original building and the two subsequent additions are prime examples of Contemporary Commercial style of the 1950s to 1960s time period. Thus, the site meets this criterion.
- 3 Historical resources that are connected with a business or use that was once common but is now rare.
  - There are no features of the building specific to the golf industry and the site does not meet this criterion.
- 4 Historical resources that are the site of significant historical events.
  - Woolley Manufacturing developed three important innovations in the golf industry at the site, which are considered significant historical events.
- 5 Historical resources that are 50 years old or have achieved historical significance within the past 50 years.
  - The majority of the building is over 50 years old, and so does meet this criterion.
- 6 Historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, or district.
  - The Golfcraft building is not a key focal point in the visual quality or character of its surrounding neighborhood.
- 7 Historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type.
  - The Golfcraft building does not qualify under this criterion. There are numerous other buildings in the Contemporary Commercial architectural style in Escondido.

## Current Integrity

The site has been modified since its original construction, and therefore an integrity analysis is important to determine if the site currently qualifies for listing and, as analyzed below, if the project would affect the integrity significantly. Integrity is necessary for the property to convey its proposed significance. There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. While the first two additions changed the exterior of the original structure, they were completed consistent with the original design and did not affect the integrity of the building significantly. However, the plant additions did not match the original design features such as the multi-light, metal-framed windows. The building is located at its original site, and the current surrounding commercial and industrial is similar to the 1950s setting. The stucco-faced additions do not match the original block structure building materials or workmanship, which reduces integrity. The office portion of the building retains its original feel, while the plant portion has more of a monolithic feel. Since most the additions occurred when Mr. Woolley was operating the facility, the building's association with him is still intact. Overall, the office has more remaining integrity than the plant portion, but both have sufficient integrity to support its eligibility under CEQA and City of Escondido criteria.

## Project Impacts

The project proposes to renovate the office and retain the core components for reuse. The most current plans for the utilization of the Golfcraft building by Escondido Disposal, Incorporated call for the retention of the core components of the building for reuse. The plans for remodeling of the office exterior to alter the front door, remove the pilasters, and modify the parapet roofline have been dropped, and the office portion of the building façade will be retained in its current configuration. The only modification will be covering the existing block above the front entrance area between the two pilasters with a wide metal facing. This metal facing will not extend above the existing roofline, so the pilasters will continue to extend above the main roofline. The metal facing will set less than four inches away from the wall so the area between the pilasters will still be inset. The metal facing will be capped with a metal strip set flush with the current roofline. The metal covering will continue the horizontal feel and the basic horizontal massing of the façade. Signage is planned to be attached to the metal facing, which will not need alterations of the building to install. As currently designed, the proposed alterations to the façade will not have a significant impact to the integrity of the Golfcraft building.

Plans also call for demolishing the majority of the additions to the plant portion of the building. As currently proposed, the two additions constructed between 1964 and 1980 will be demolished, as well as the small 1952–1964 addition. The 1964–1980 additions may be associated with the period of Woolley's ownership of Golfcraft between 1952 and 1971. The 210 feet by 24 feet flat-roofed building along the southwest side of the original plant has only a single exterior wall which displays no unique architectural design features. This wall does not contribute to the Contemporary Commercial architectural style of the building. The second addition, the largest, also displays no Contemporary Commercial design elements. It is strictly a utilitarian, industrial design addition. It also does not have the banks of multi-light metal frame windows present on the 1964–1980 addition exterior wall. The loss of these two additions would not significantly alter the integrity of the original plant building.

The southwest wall of the original plant building will be exposed when the 1964–1980 additions are removed. Current plans call for a complete demolition of the existing wall and construction of a new wall with shipping dock, ramps, and access doors. The wall currently has four large rectangular holes which were probably originally banks of windows. There are also two doors on the southeastern end of the wall. Since no photographs or drawings of the original plant configuration were found it is difficult to know if these openings were part of the original design, especially the doors.

The northeast wall of the original plant building will remain an exterior wall. Current plans call for retention of the existing shed roof, wood patio cover, windows, and doors.

The small 1953–1964 addition is mostly surrounded by building and only a single northeast-facing exterior wall is visible. This wall has no architectural detail, and its loss would not be a significant impact to the integrity of the plant building.

In summary, the current plans for the reuse of part of the Golfcraft building and demolition of some of the additions to the plant portion of the building will not have a significant adverse impact on the integrity of the Golfcraft building. The office portion of the building would be retained in its current condition, with no significant exterior structural alterations. The addition of a metal strip above the door and windows will not alter the design of the office façade and is not an irreversible alteration. The demolition of one wall of the original plant building area will not have a significant impact on the integrity of the plant building. The Golfcraft building will remain eligible for listing on the CRHR and the City of Escondido Local Register of Historic Places. Impacts would be less than significant.

*b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**Less than Significant with Mitigation.** Since substantial subsurface excavation was not previously required to construct the existing development and the site is located in a flat valley area that was near a river, there is potential that subsurface archaeological resources could exist. Proposed grading would involve cuts up to 9 feet in depth and up to approximately 7,000 cubic yards of total earthwork. Thus, the proposed grading could impact significant archaeological resources and mitigation would be required to reduce this potential impact to below a level of significance. Mitigation would consist of grading monitoring by qualified archaeology and Native American monitors as follows:

**ARC-1:** A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.

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

**Less than Significant with Mitigation.** Underlying geology includes Old Alluvial Valley Deposits (late to middle Pleistocene), which is a formation with a moderate potential to yield paleontological resources (City of Escondido 2012b). Given that the site was previously graded to complete the existing development on-site, the site is also underlain by fill. The site does not contain any unique geologic features.

If earthwork extends into the underlying Old Alluvial Valley Deposits, it could potentially damage or destroy significant fossils. Destruction or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. The project involves grading cuts up to 2 feet within a narrow swath along the western project boundary in order to construct the bio-swales; this grading is not anticipated to extend into the Old Alluvial Valley Deposits and would be less than significant. Further, the majority of the cut is located within previously disturbed soils where no potential for significant paleontological resources exists. However, there is a limited area within the southern portion of the site, adjacent to Washington Avenue building in which there would be grading up to 9 feet in depth to construct a basement. The basement would catch percolate from the anaerobic digester proposed as part of Phase 4. The impact associated with grading for the percolate basement would be potentially significant and would require mitigation. Mitigation would consist of grading monitoring by a qualified paleontological monitor as follows:

**PAL-1** Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:

- A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).
- In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.
- A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

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

**No Impact.** If any remains are encountered, the project would proceed in accordance with CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5). Thus, the project would have no impact to human remains.

## **VI. GEOLOGY AND SOILS**

*Would the project:*

*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?*

**Less than Significant Impact.** The site is located within the southern California seismically active region. No known active faults are located on-site or within 15 miles of site vicinity (City of Escondido 2012b). Nonetheless, the site could be subject to significant shaking during a major earthquake on any regional fault. Compliance with the State Uniform Building Code ensures that the risk of seismic ground shaking project impacts would be less than significant.

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

**Less than Significant Impact.** According to the General Plan (Figure VI-9), the southern area of the site may be subject to liquefaction. As required by the State Uniform Building Code, the project would be required to

implement standard engineering measures to ensure that impacts would be less than significant impact related to liquefaction.

*iv. Landslides?*

**No Impact.** As with the surrounding area, the site is relatively flat. Per the General Plan (Figure VI-9), the site is not located in an area with slopes over 25 percent or in a potential landslide area. Thus, the project would have no impact related to landslides.

*b. Result in substantial soil erosion or the loss of topsoil?*

**Less than Significant Impact.** As indicated under Section IX, Hydrology and Water Quality, the project would implement best management practices (BMPs) during construction and operation in compliance with regulations. Project impacts related to soil erosion would be less than significant.

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

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

**Less than Significant Impact.** As indicated above, the project site may be subject to liquefaction (General Plan Figure VI-9). The soils on-site consist of Ramona sandy loam and Placentia sandy loam (SANGIS 2015), which are not expansive soils (City of Escondido 2012b). The underlying geologic formations in the City are mostly granitic and have a very low potential of subsidence (City of Escondido 2012b). As a part of the grading permit process, the project will complete a geotechnical report. Ultimately, compliance with the State Uniform Building Code ensures that the risk of geologic impacts would be less than significant.

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

**No Impact.** The project is connected to the City's wastewater system and would not utilize septic tanks or an alternative wastewater disposal system.

## **VII. GREENHOUSE GAS EMISSIONS**

*Would the project:*

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

**Less than Significant Impact.** The City of Escondido has prepared a Climate Action Plan (E-CAP, City of Escondido 2013) demonstrating how the City would reduce GHG emissions. Local GHG reductions would come from improvements to residential and commercial building energy efficiency (45.8 percent), revised land use policies and increased public transportation (33.9 percent), and implementation of a Waste Disposal Program (18.1 percent). The E-CAP establishes a threshold level of 2,500 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>E) per year for identifying projects that require a project-specific technical analysis to quantify and mitigate project emissions.

Emissions due to the project were calculated using CalEEMod, and the associated data are included in the GHG analysis prepared by RECON (RECON 2015c; Attachment 4). The emissions sources include

construction (amortized over 30 years), mobile (on-road vehicles), energy use, water use, and solid waste sources, as shown in Table 6.

**TABLE 6  
PROPOSED FACILITY EMISSIONS IN 2020  
(MTCO<sub>2</sub>E per year)**

Emission Source	Facility Emissions
Vehicles	434
Energy Use	775
Area Sources	482
Water Use	266
Solid Waste Disposal	119
Construction	12
<b>Total Emissions</b>	<b>2,088</b>

SOURCE: RECON 2015c.

The project would generate 2,088 MTCO<sub>2</sub>E. This conservatively includes all emissions associated with the entire EDI Recycling Facility even though the project would only renovate and construct part of the EDI Recycling Facility. According to the City’s CEQA Thresholds and Screening Tables, projects that generate less than 2,500 MTCO<sub>2</sub>E per year would not have a significant impact on the environment as a result of GHG emissions. Therefore, project emissions would result in less than significant impacts.

*b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?*

**Less than Significant Impact.** The E-CAP Reduction Measure R2-S1 is implementation of a Waste Disposal Program. The measure sets target disposal rates of 5 pounds per resident and 14 pounds per employee in Escondido. The measure identifies potential methods of achieving this goal as “expanded recycling facilities and increased recycling pickups.” Consistent with the measure, this project would expand the EDI Recycling Facility. Additionally, the project would generate less than 2,500 MTCO<sub>2</sub>E per year. According to the E-CAP, projects that generate less than 2,500 MTCO<sub>2</sub>E would be considered to have a “less than significant GHG emissions impact because of the low amount of GHG emissions generated” (City of Escondido 2013). Thus, the project would be consistent with local plans to reduce GHG emissions.

The project would support the CARB Scoping Plan’s Key Recommended Actions for the waste and energy sectors. The Scoping Plan states “meeting the AB 341 mandate 75 percent recycling goal is the best path forward to maximizing GHG emissions reductions from the waste management sector. The purpose of the project is to accommodate the separate sorting lines required to meet the state-level diversion requirements (AB 341). Thus, the project supports AB 341 and the Scoping Plan waste reduction goals.

The Scoping Plan promotes diversification of the state’s electricity supply and decreased reliance on fossil fuel energy sources. The project would incorporate an AD facility capable of converting 31,200 tons of organic waste into 5.0 gigawatts per hour per year of renewable energy or 420,000 dge per year of CNG, a renewable vehicle fuel source. As discussed in Section 6.4, Assessment Methodology, this analysis conservatively assumes natural gas from the AD facility would be used for generation of electricity. This generation of electricity would offset GHGs that would have been generated by the San Diego Gas & Electric (SDG&E) to produce this amount of energy.

Emissions offsets were modeled using CalEEMod, which calculates emissions based on current SDG&E intensity factors. The project would potentially offset annual emission of 1,637 MTCO<sub>2</sub>E from SDG&E using

fossil fuel energy sources. Therefore, as the project would support SDG&E's efforts to achieve RPS requirements, the project is consistent with the Scoping Plan. Overall, the project would reduce GHG emissions generated at the site, and would comply with the E-CAP and associated GHG policies. The project would result in less than significant impacts to applicable plans, policies, and regulations.

## VIII. HAZARDS AND HAZARDOUS MATERIALS

*Would the project:*

- a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

### **Less than Significant Impact with Mitigation.**

#### Asbestos and Lead

The U.S. Environmental Protection Agency (EPA), California Environmental Protection Agency (CalEPA) and the Occupational Health and Safety Administration (OSHA) regulate hazardous materials, including asbestos- and lead-containing materials. EPA banned several asbestos-containing products in the 1970s (see 40 Code of Federal Regulations [CFR] Part 61, Subpart M; 16 CFR Part 1305; and 16 CFR 1304). Per OSHA (29 CFR 1926.1101 and 29 CFR 1910.1001), insulation, surfacing, asphalt, and vinyl flooring materials prior to 1980 should be assumed to be asbestos-containing materials and handled accordingly. EPA and OSHA require proper abatement and disposal of asbestos- and lead-containing materials to protect human health and safety. If the abatement activities involve over 100 square feet of asbestos-containing materials, then the asbestos abatement is required to be completed or overseen by a certified consultant (Title 8, California Code of Regulations [CCR], Article 2.6, Section 341.15). On a local level, these regulations are implemented through County of San Diego Air Pollution Control District (APCD) and the County of San Diego Department of Environmental Health.

Most of the existing structures on-site have potential to contain asbestos and lead, as they were constructed prior to 1980. As such, the proposed demolition and renovation could result in lead- and asbestos-containing materials becoming airborne and inhalable. The exposure of workers to lead- or asbestos-containing dust would result in a potentially significant hazardous material impact.

To mitigate these potential impacts to below a level of significance, the following shall be implemented:

**HAZ-1:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.

**HAZ-2:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based

paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

- 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?*

**Less than Significant Impact.** The project would include typical construction activities, which may involve the use of lubricating oils, paints, solvents, and other materials. Operations and maintenance of the proposed project would also involve the use of pesticides, herbicides, cleaning solvents, oils, paints, and other regulated common hazardous materials. ~~As in the existing conditions, the site would include a household hazardous waste drop-off facility and a recycling center that would involve hazardous materials.~~ The project activities would be completed in compliance with regulations, including the proper use, transport, and disposal of hazardous materials. The project would comply with the County DEH requirements, including the requirement to prepare and comply with a Hazardous Materials Business Plan. As in the existing conditions, the site would include an HHW drop-off and a recycling center that would involve hazardous materials. The use of regulated hazardous materials in routine operations and maintenance of the site and fleet vehicles is an existing condition that would continue upon approval of the proposed project. While hazardous wastes such as oil or batteries occasionally enter the site as part of the waste load check process, the handling, temporary storage, and disposal procedures that are currently in place pursuant to an approved Hazardous Materials Business Plan would continue to be implemented by the proposed project. When the Solid Waste Facility Permit is revised, the Hazardous Materials Business Plan will be updated. The site currently is covered by three DEH permits, including the SANCO Recycling permit, the Escondido Resource Recovery Permit, and the Escondido Disposal, Inc. Permit. Compliance with regulations would ensure potential hazardous material use impacts of the project would be below a level of significance.

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

**No Impact.** The project is not located within one-quarter mile of a 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?*

**Less than Significant Impact.** According to GEOTRACKER (RWQCB 2014), the project site is identified as having a former leaking underground storage tank (LUST; RWQCB Case #9UT3802; Local Case #H29584-001) that resulted in the release of diesel fuel. The site was also a former manufacturing center. In addition, the site is currently used as a recycling center and includes a household hazardous waste drop-off facility.

As the LUST was cleaned up in 1999 and the case was closed, grading activities are not expected to encounter contaminated soils that could potentially create a hazard to the public or environment. Considering the proposed project would continue the use of the site as a recycling facility and would not include any sensitive receptors, the project would not expose the public or environment to hazards associated with a listed hazardous material site during operations and the project would have a less than significant impact.

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

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

**No Impact.** The site is not located within 2 miles of a private or public airstrip. The nearest airports are McClellan-Palomar Airport located over 9 miles to the west and Ramona Airport located over 11.5 miles to the southeast. The project is not located within an Airport Influence Area for either of these airports (San Diego County Regional Airport Authority 2011a and 2011b) or any other airport land use compatibility plan.

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

**No Impact.** The Escondido General Plan (City of Escondido 2012a) Figure VI-1 illustrates the evacuation routes for the City. In the project vicinity, W. Washington Avenue, Valley Parkway, Rock Springs Road, Quince Street, Centre City Parkway, Highway 78/Lincoln Avenue, and I-15 are identified as evacuation routes. The project site is already developed, and the proposed site reorganization would not impair the use of these roadways for evacuation purposes. Thus, the project would have no impact to emergency response or evacuation plans.

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?*

**Less than Significant Impact.** The Escondido General Plan (City of Escondido 2012a) Figure VI-6 illustrates the wildfire risk within the City. Per that map, the site is identified as having a moderate wildland fire risk, which is the lowest risk category in the City. The site is not adjacent to wildlands, is currently developed, and the project would comply with Fire Code regulations. Considering this, the project's reorganization of an existing recycling facility would result in a less than significant impact associated with the increased exposure of people or structures to a wildfire risk.

## **IX. HYDROLOGY AND WATER QUALITY**

*Would the project:*

a. *Violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters (Consider temperature, dissolved oxygen, turbidity and other typical storm water pollutants)?*

b. *Have potentially significant adverse impacts on ground water quality, including but not limited to, substantially depleting groundwater supplies or substantially interfering with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of 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 and/or significant adverse environmental impacts?*

e. *Cause significant alteration of receiving water quality during or following construction?*

f. *Cause an increase of impervious surfaces and associated run-off?*

- g. *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?*
- h. *Cause potentially significant adverse impact on ground water quality?*
- i. *Cause or contribute to an exceedance of applicable surface or ground water receiving water quality objectives or degradation of beneficial uses?*
- j. *Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?*
- k. *Create or exacerbate already existing environmentally sensitive areas?*
- l. *Create potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?*
- m. *Impact aquatic, wetland or riparian habitat?*
- n. *Otherwise substantially degrade water quality?*
- o. *Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*
- p. *Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

**Less than Significant Impact.** The site is currently developed and no existing flooding issues exist on-site or in the immediate vicinity. The site is not located within a 100-year floodplain (SANGIS and City of Escondido 2012b).

A Preliminary Drainage Report (Chang Consultants 2015a; Attachment 5) and a Preliminary Water Quality Technical Report (WQTR; Chang Consultants 2015b; Attachment 6) have been prepared to address water quality and drainage for the proposed project. The following analysis is based on those reports.

### Drainage

As discussed in the drainage report, under existing pre-project conditions, the northerly site runoff is tributary to a storm drain system approximately mid-way up the site that extends west to Metcalf Street. There is an off-site area to the east that is tributary to the northerly half of the site. The off-site runoff is conveyed through the site with the northerly on-site runoff to the existing storm drain system. The southerly site runoff is tributary to an existing storm drain system in W. Washington Avenue. The two storm drain systems confluence at the intersection of Metcalf Street and W. Washington Avenue. Under proposed post-project conditions, the entire on- and tributary off-site runoff would be directed towards W. Washington Avenue where it would be conveyed towards the storm drain confluence location. An additional storm drain would be constructed in W. Washington Avenue from the site to the confluence location to handle the added runoff at the south end of the site.

The 100-year rational method was used during preparation of the drainage report and the results of the analysis indicated that the existing condition 100-year runoff from the northerly and southerly portions of the site are 34.7 and 17.6 cubic feet per second (cfs), respectively, or 52.3 cfs total. The proposed condition 100-year runoff is 51.0 cfs and 1.3 cfs (respectively) or 52.3 cfs total. Therefore, the project would not increase the runoff or the 100-year flow rate. This result is to be expected because the land use is not changing and the grading is minimal. In addition, as discussed in the project description, the project would increase the landscaping from 31,280 square feet to 61,271 square feet. Therefore, when considering the increased amount of landscaping and the proposed bio-swales, the overall runoff would actually be slightly less after

implementation of the master plan improvements. Further, the project is exempt from hydromodification requirements.

The site is within Zone X per the Federal Emergency Management Agency (FEMA). Zone X is outside of the 500-year floodplain (FIRM Panels 06073C1076G and 06073C0813G). As such, the project would not place any structures or alter areas within a flood hazard. Also, the project would not increase drainage discharge rates and would therefore not exacerbate any downstream flooding issue. Overall, the project would have less than significant impacts related to drainage and flooding.

### Water Quality

As discussed in the WQTR, the project is located within the Escondido Hydrologic Subarea (904.62) of the Escondido Creek Hydrologic Area (904.60), which is within the Carlsbad Hydrologic Unit (904.00). The total drainage area of the hydrologic unit is approximately 210 square miles. Runoff from the site and portions of the hydrologic subarea ultimately drain to Escondido Creek, which is approximately 1,500 feet south of the site. Escondido Creek extends west to San Elijo Lagoon, then the Pacific Ocean. The project site represents less than one percent of the overall watershed. Inland surface water beneficial uses listed for the Escondido Creek Hydrologic Area are municipal, agricultural, industrial, contact recreation, non-contact recreation, warm freshwater habitat, cold freshwater habitat, and wildlife habitat.

The receiving waters for the site include Escondido Creek and the San Elijo Lagoon. According to the 2010 303(d) list approved by the State Water Resources Control Board (and by the EPA in November 2010), Escondido Creek is 303(d) listed for dichlorodiphenyltrichloroethane (DDT), enterococcus, fecal coliform, manganese, phosphate, selenium, sulfates, total dissolved solids, total nitrogen and toxicity. San Elijo Lagoon is 303(d) listed for eutrophic, indicator bacteria, and sedimentation/siltation. Neither of the two water bodies is subject to total maximum daily loads (TMDLs). Pollutants of concern that are anticipated or can potentially exist for this project type (included within the Heavy Industry, parking lot, and streets, roads, highways and freeways categories) are: sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, and pesticides.

As indicated above, the additional storm drain that would be constructed within W. Washington Avenue as part of the proposed project, as well as the on-site improvements, would ensure that the on-site and off-site runoff would continue to confluence at the same location and that the project would not increase the overall runoff. The proposed storm drain system would collect the off-site runoff at the easterly edge of the site in order to prevent commingling of the on- and off-site runoff until the on-site runoff is treated. Treatment would occur via the installation of on-site basins throughout the landscaped areas which treat the runoff through contact and bio-filtration by vegetation.

To address the potential pollutants of concern, the project would implement construction and post-construction BMPs in compliance with the City and Regional Water Quality Control Board regulations. These BMPs are identified briefly below and listed in their entirety within the WQTR appended to this document:

- Construction BMPs are anticipated to include silt fencing, gravel bag barriers, street sweeping, solid waste management, stabilized construction entrance/exits, water conservation practices, and spill prevention and control.
- Operational BMPs would include BMPs Low Impact Development (LID) design practices, source control, and treatment control:
  - Site design BMPs include the landscaping and bio-retention areas mentioned previously which serve to increase the pervious surfaces within the site. Other site design BMPs would include

provisions for roof drains which discharge to the landscaped areas; and using water efficient irrigation systems (with rain shutoffs) for the landscaping.

- Source control BMPs are measures used to prevent polluted runoff and include items such as marking the storm drain inlets, designing landscaping to minimize the need for fertilizers and pesticides, and plumbing interior floor drains to the sewer system.
- LID site design BMPs are required to meet the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and include optimizing the site layout to preserve natural drainage features and minimizing roofs and paving, utilizing pervious surfaces, dispersing runoff from impervious to pervious surfaces, and/or draining impervious surfaces to bio-retention facilities.

The use of these BMPs (listed in detail within the WQTR) would reduce potential water quality impacts to below a level of significance.

*q. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

**Less than significant.** Per the General Plan Dam Failure Inundation Areas Figure VI-8, the site is located within both the Lake Wohlford Dam Failure and the Dixon Lake Inundation Areas. To address such potential issues, the Multi-Jurisdictional Hazard Mitigation Plan and Lake Dixon and Lake Wohlford Dam Emergency Action Plans were prepared by the City, County and various jurisdictions. These Emergency Action Plans identify these dams as having a low dam failure risk. These plans provide the proper planning to address potential dam failure, including evacuation and emergency response planning.

The project would not attract additional people to the site or include any new "unique institution" uses (e.g., hospitals, schools, jails/ detention facilities, stadiums) that would result in a high density of people at the site. Considering the emergency plans in place and the nature of the proposed project, the potential flooding impact related to failure of a dam would be less than significant.

No levees are located near the project. Thus, the project would have no impact related to inundation by levee failure.

*r. Inundation by seiche, tsunami, or mudflow?*

**No Impact.** The site is not located near a significant body of water that is not protected by a dam. The project site is over 13 miles inland from the Pacific Ocean and is over 600 feet above sea level. The site is not located on or near an unstable hillside that could result in mudflow. Thus, the project would have no impact related to inundation by seiche tsunami or mudflow.

## **X. LAND USE PLANNING**

*Would the project:*

- a. Physically divide an established community?*
- b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*
- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?*

**No Impact.** The site is already developed and the proposed recycling facility reorganization would not divide the established central Escondido community. The site is designated as General Industrial and Light Industrial by the General Plan (2012a), and zoned M-1 and M-2 by the City Zoning Code. The recycling facility would be consistent with this designation, and the zoning code allows for a recycling transfer station as a conditional use. The recycling center currently has a conditional use permit, and the project includes obtaining an updated conditional use permit to cover the proposed reorganized facility.

The site is within the Downtown Transit Station Target Area identified in the General Plan (2012a), which calls for a regional attraction north of the transit center, incentives for increased densities and employment, and continuation of existing construction material manufacturing, trash transfer, and agricultural supply land uses west of Reidy Creek and prohibition of similar new uses. The project would be consistent with these goals, as it would continue the operations of the trash transfer facility and would not interfere with the implementation of the other goals.

The site is not located within an area designated for conservation and does not include any native habitat covered by a natural community conservation plan. The site is not located in a specific plan area per the General Plan (2012).

For the reasons described above, the project would have no environmental impact related to land use planning.

## **XI. MINERAL RESOURCES**

*Would the project:*

- a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land-use plan?*

**No Impact.** Regardless of underlying geology, it would not be feasible to utilize the site for mining operations due to the site's size and adjacency to existing structures and roadways. The implementation of the project would, therefore, result in no impact related to the loss of a local, regional, or state mineral resource.

## **XII. NOISE**

*Would the project 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?*

**Less than Significant Impact.** The site is partially developed with a recycling facility and a manufacturing plant within an industrial area. Existing noise at the site is primarily generated by large trucks. Existing noise

in the vicinity is generated by local vehicular traffic, I-15 traffic, and the railroad (Site Visit - Noise Measurements 2014). There are no existing on-site or surrounding land uses that are noise-sensitive.

The project construction and renovation activities would comply with the Noise Ordinance construction limits of 75 average equivalent A-weighted decibels (dB(A)  $L_{eq}$ ), between the hours of 7:00 A.M. and 6:00 P.M. on weekdays and between the hours of 9:00 A.M. and 5:00 P.M. on Saturdays. Construction noise impacts would thus be less than significant.

The proposed project would not significantly alter on-site noise generation, as future uses would be similar to the existing uses, would use similar controls, and the project would not increase through-put capacity which could require more collections transfer trucks. The project would rearrange internal uses, and most of the noise-generating uses and equipment would be enclosed within structures. The only exceptions would include the new conveyor systems that would pass outside under a canopy between buildings, the new CNG compressors used for fueling, and the combined heat and power unit, with associated flare. The buildings would attenuate on-site noise sources from the adjacent uses to the east and north.

Two conveyor lines would extend between the new buildings and the existing transfer station under the maintenance canopy a distance of approximately 71 feet. Conveyor noise levels can range from 80 to 85 dB(A)  $L_{eq}$  at 3 feet depending on the material being transported and the speed of the conveyor. The conveyors used in the material recovery process move at relatively slow speed and would likely generate noise levels on the lower end. The two conveyor lines are 260 and 285 feet from the western property. At this distance the conveyor noise would attenuate to less than 50 dB(A)  $L_{eq}$  or less at the property line.

The combined heat and power unit, the biogas chiller, and the bio-filer would be located at the southwest corner of the existing mixed MRF area. A biogas combustion flare would be located approximately 50 feet north of the biogas chiller. The primary noise source in this equipment package would be the combined heat and power unit, which is estimated to generate approximately 81 db(A)  $L_{eq}$  at 50 feet under constant operation. The combined heat and power unit would be approximately 255 feet from the western property line; however, unlike the conveyor, the combined heat and power unit would be shielded from the western property line by an 8-foot-high concrete/masonry wall. Thus, with consideration of the wall and distance the noise level from the power generation equipment would attenuate to 60 dB(A)  $L_{eq}$  or less at the property line.

The project would also comply with the Noise Ordinance that establishes noise regulations to prohibit disturbing, excessive, or offensive noise. The surrounding properties are zoned light industrial and general industrial, which are not noise-sensitive uses. The light industrial noise limit is 70 dB(A)  $L_{eq}$  and the general industrial zone noise limit is 75 dB(A)  $L_{eq}$ . Therefore, on-site stationary noise of the project would be less than significant.

As described in the traffic analysis, the project would not generate additional traffic and would not significantly affect the distribution of traffic. In addition, the uses adjacent to the roadways primarily utilized by the site traffic are not sensitive to noise. The project's recycling center use is not noise-sensitive as well. Thus, the project would have less than significant impact related to traffic noise.

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

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

**No Impact.** The site is not a noise-sensitive receptor, would not attract additional people to the site, and is not within an airport noise contour. The project would have no impact related to placing a noise-sensitive receptor or additional people within an excessive airport noise area.

### **XIII. POPULATION AND HOUSING**

#### ***Would the project:***

- a. *Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*
- c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

**No Impact.** The project involves the redevelopment of an existing industrial site. As such, it would not displace any housing or directly or indirectly alter population and/or housing. The project would not increase the capacity of the recycling facility and would not increase infrastructure capacity or draw additional residents to the area. All infrastructure improvements included as a part of the project are intended to serve the project only and would not promote additional development in the area. Thus, the project would have no impact to population and housing.

### **XIV. PUBLIC SERVICES**

#### ***Would the project:***

- a. *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*
  - i. *Fire protection?*
  - ii. *Police protection?*
  - iii. *Schools?*
  - iv. *Parks?*
  - v. *Other public facilities?*

**No Impact.** As indicated above, the project would not induce growth either directly or indirectly. Thus, the project would not result in additional demand for schools, parks, libraries, police, or fire protection. The project would have no impact to public services.

### **XV. RECREATION**

#### ***Would the project:***

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

**No Impact.** The project involves redevelopment of an industrial site. As such, it would not result in a need for additional recreational facilities or affect any existing recreational facility. Thus, the project would result in no impact to recreational facilities.

**XVI. TRANSPORTATION/TRAFFIC**

*Would the project:*

- a. *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?*
- b. *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

**Less than Significant Impact.** The proposed project would retain the existing permitted capacities of the facility and would not generate additional truck traffic. Additionally, even with the addition of the visitor center, which is not anticipated to generate any trips during peak hours as it is intended for school programs or small organizational tours by appointment, the project would likely decrease traffic generation from the overall site when considering the removal of the existing commercial business on W. Mission Avenue. While the project would slightly alter the distribution of the traffic from W. Washington Avenue to W. Mission Avenue, the redistribution would likely improve conditions on W. Washington Avenue and have little effect on W. Mission Avenue.

This is supported by the existing conditions, as the City determines the level of service (LOS) on roadway based on the volume-to-capacity ratio. The LOS and associated volumes are presented in Table 7. As shown in Table 8, the existing average daily traffic (ADT) volumes of on W. Mission Avenue are currently 21,400 ADT. Thus, it would require approximately 6,000 additional ADT on W. Mission Avenue to worsen the LOS. Thus, even with a very conservative estimate for project related traffic, the project is not anticipated to result in the addition of 6,000 ADT to W. Missions Avenue. Furthermore, the overall change in traffic is anticipated be negligible when considering (1) the elimination of the commercial sales and warehouse traffic from the former Golfcraft plant, (2) the use of the northern W. Mission Avenue driveways for office and self-haulers traffic only, (3) the fact that self-haulers are more active on weekends and would not affect weekday peak hour conditions at intersections, and (4) the continuation of the southern W. Washington Avenue driveways use for the majority of site truck traffic. Additionally, the project would not alter transit, pedestrian or bicycle usage or access. Therefore, the project would have a less than significant impact the performance of the circulation system or conflict with the City’s traffic operations standards.

**TABLE 7  
CITY OF ESCONDIDO LEVEL OF SERVICE STANDARDS STREET SEGMENT ADT THRESHOLDS**

Street Classification	Lanes	Cross Sections	Level of Service						
			A	B	Mid C	C	Mid D	D	E
Major Road	(6 Lanes)	90/110	17,000	2,700	32,000	37,000	40,750	44,500	50,000
	(4 Lanes)	82/102	12,600	20,000	23,700	27,400	30,150	32,900	37,000

**TABLE 8  
CITY OF ESCONDIDO LEVEL OF SERVICE STANDARDS STREET SEGMENT ADT THRESHOLDS**

Roadway	Roadway Characteristics			General Plan Roadway Classification	Existing ADT	Existing LOS
	Number of Lanes	Parking	Cross-Section Width			
W. Mission Avenue						
Andreasen Drive to Rock Springs Road	4	No	64	Major Road	21,400	C

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

**No Impact.** As indicated above, the project is not located within an Airport Influence Area and would not affect air traffic patterns.

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

**No Impact.** The project would not include improvements to roadways, but would modify existing driveways. Driveway changes would not increase hazardous conditions, as driveways already exist on these roadways and driveways would be designed to accommodate large trucks.

e. *Result in inadequate emergency access?*

**No Impact.** As the project access driveways are designed for large vehicles, they would also adequately accommodate emergency vehicle access. Similar, internal circulation is also geared towards large vehicles and would provide adequate turn-around areas and overall emergency access.

f. *Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

**No Impact.** The project would retain the existing sidewalks along the perimeter and would not alter any public transit or bicycle facilities. Therefore, the project would have no impact to public transit, bicycle, or pedestrian facilities.

**XVII. UTILITIES AND SERVICE SYSTEMS**

*Would the project:*

a. *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

b. *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**No Impact.** Dry AD technologies have limited requirement for process water. Water is introduced into the dry AD system via the organic waste itself. Depending on the moisture content of the organic waste processed in the dry digesters, there may be periods when additional percolate water makeup is required (in the case of lower moisture content feedstocks), or when excess percolate is generated (in the case of higher moisture content feedstocks). When there are periods with wetter organics, this percolate is sanitized and held to be

applied later when the incoming organic waste material is dryer. There would be no need for discharges to the waste water system.

Additionally, considering the project would not increase the permitted capacity of the recycling center and would eliminate the existing commercial uses at the site, the project would decrease the water demand and wastewater treatment demand at the site. The project would include all on-site wastewater and water system improvements necessary to serve the project. No new or expanded water or wastewater-related facilities would be required.

*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?*

**No Impact.** The project would install a 36-inch RCP for storm water conveyance in W. Washington Avenue; the RCP would extend along the right-of-way to connect downstream of Metcalf Street. Additionally, implementation of the project would decrease the impervious area on-site, and the project would include all necessary storm water drainage facility upgrades necessary to meet the current storm water requirements. See Section IX, Hydrology and Water Quality, for additional information. Therefore, the project would have no impact related to storm-drain facilities.

*d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

**No Impact.** As indicated above, the project would not generate an additional demand for water. Further, regional water planning documents utilize zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate water supply. The project would not alter the zoning or land use of the site and, therefore, would not result in a need to revise estimated regional water demands or alter existing entitlements. Also, the existing Conditional Use Permit allows for a recycling facility of the same capacity as the project. Therefore, the project would not result in a need to alter existing water entitlements and would have no impact related to water supply entitlements.

*e. Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**No Impact.** As indicated above, the project includes all on-site wastewater improvements necessary to serve the project, and no off-site improvements would be required to provide wastewater treatment for the project. The project would not increase wastewater generated at the site. Thus, the project would have no impact related to wastewater treatment capacity.

*f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

**Less than Significant Impact.** The project would involve demolition and construction that would generate solid waste. Construction and demolition waste would be disposed of at regional landfills, green waste centers, and recycling centers, as appropriate. The project would minimize construction waste by reusing existing buildings as possible, and recycling construction and demolition waste as possible. The project would not result in a need for new or expanded solid waste facilities off-site. Thus, project impacts related to solid waste would be less than significant

*g. Comply with federal, state, and local statutes and regulations related to solid waste?*

**Less than Significant Impact.** The proposed project would expand the physical size of the existing recyclable materials sorting facility, but would retain the same solid waste through-put capacity as the existing

facility. The project would comply with its existing solid waste permits (SANCO Recycling Permit, the Escondido Resource Recovery Permit, and the Escondido Disposal, Inc. Permit). Thus, the project would comply with solid waste regulations.

## **XVIII. MANDATORY FINDINGS OF SIGNIFICANCE**

*Would the project:*

- a. *Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*
- c. *Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?*

**Less than Significant Impact with Mitigation.** The project would have no significant impact to biological resources with the exception that monitoring and avoidance (**BIO-1** and **BIO-2**, Section IVa) would be required to ensure that impacts would not occur to raptor or migratory bird nests (if present). Monitoring during grading activities would be required by an archaeological and Native American monitor (**CUL-1**, Section Vb) to ensure that there would be no impacts to subsurface cultural resources. A paleontological monitor (**PAL-1**, Section Vc) would be required during excavation for the percolate basement proposed as part of Phase 4 in order to ensure that potential impacts to subsurface paleontological resources would not occur. The project would result in significant hazards impacts related to potential asbestos and lead within existing structures, but would mitigate these impacts to below a level of significance through **HAZ-1** and **HAZ-2** (Section VIIIa).

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*
- d. *Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations {Zoning Code Section 33-924 (a)}?*

**Less than Significant Impact.** As described previously, cumulative impacts of the project would be less than significant. No deficiencies related to the City's General Plan Quality of Life Standards would occur.

## **MANDATORY FINDINGS OF SIGNIFICANCE**

The project would have potential impacts related to biological resources, cultural (archaeological) resources, paleontological resources, and hazards and hazardous materials. With the implementation of the mitigation measures and conditions of approval, the project is not expected to have any significant impacts, either short-term or long-term, nor would it cause substantial adverse effects on human beings, either directly or indirectly. The project would not degrade the quality of the environment for plant or animal communities since the project would 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 would not materially degrade levels of service of the adjacent streets, intersections, or utilities. Therefore, in the City of Escondido staff's opinion, the proposed project would not have a significant individual or cumulative impact to the environment.

## SUMMARY OF MITIGATION MEASURES

### Biological Resource Mitigation:

- BIO-1:** A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.
- BIO-2:** If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

### Cultural Resource Mitigation:

- ARC-1:** A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented

### Paleontological Resources Mitigation:

**PAL-1** Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:

- A qualified paleontologist or a paleontological monitor shall be on site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).
- In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be

cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.

- A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

**Hazardous Materials Mitigation:**

**HAZ-1:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that would be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that would be taken to remediate the hazard.

**HAZ-2:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).



**\*** Project Location

FIGURE 1

Regional Location



 Project Boundary

FIGURE 2  
Project Location  
on Aerial Photograph

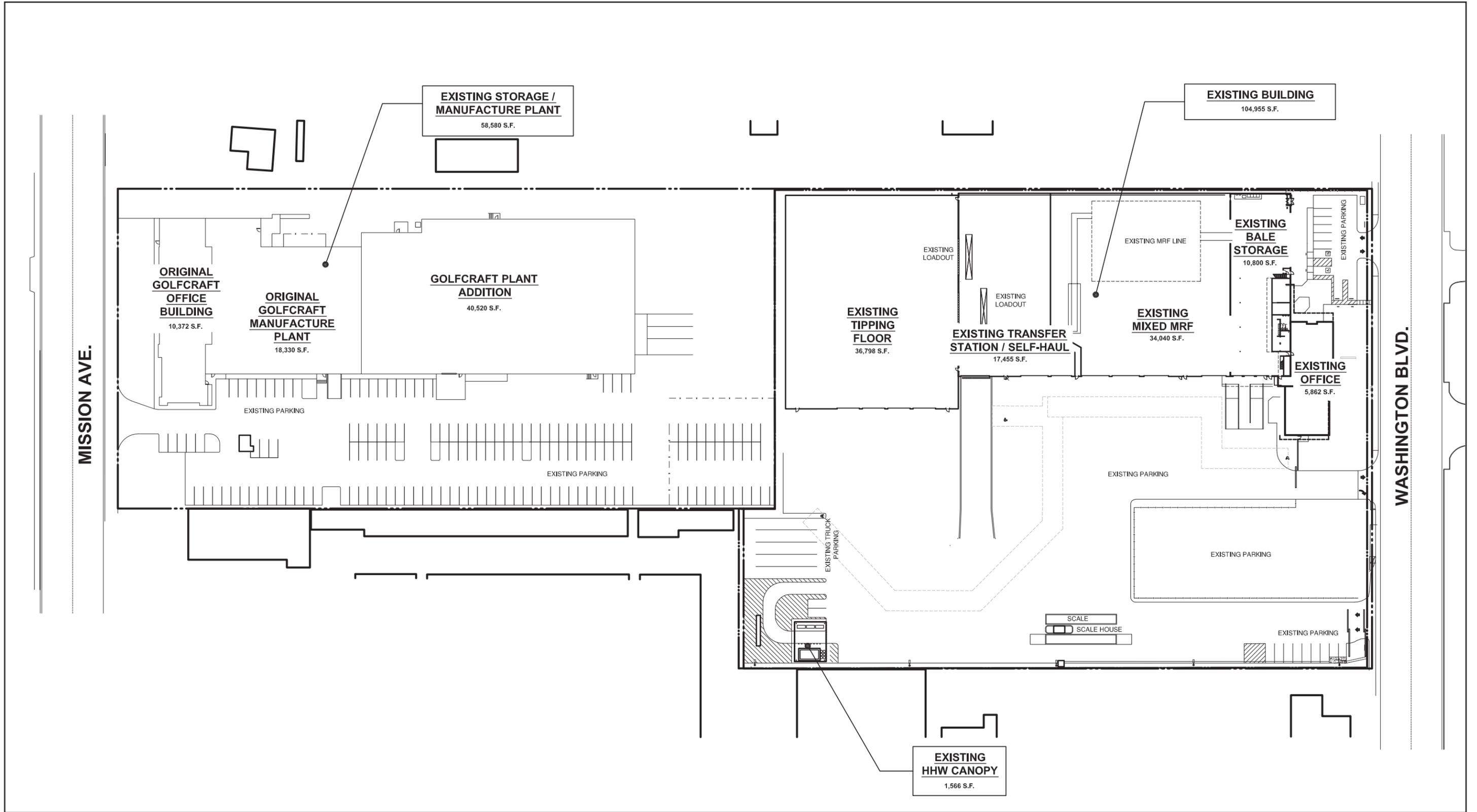
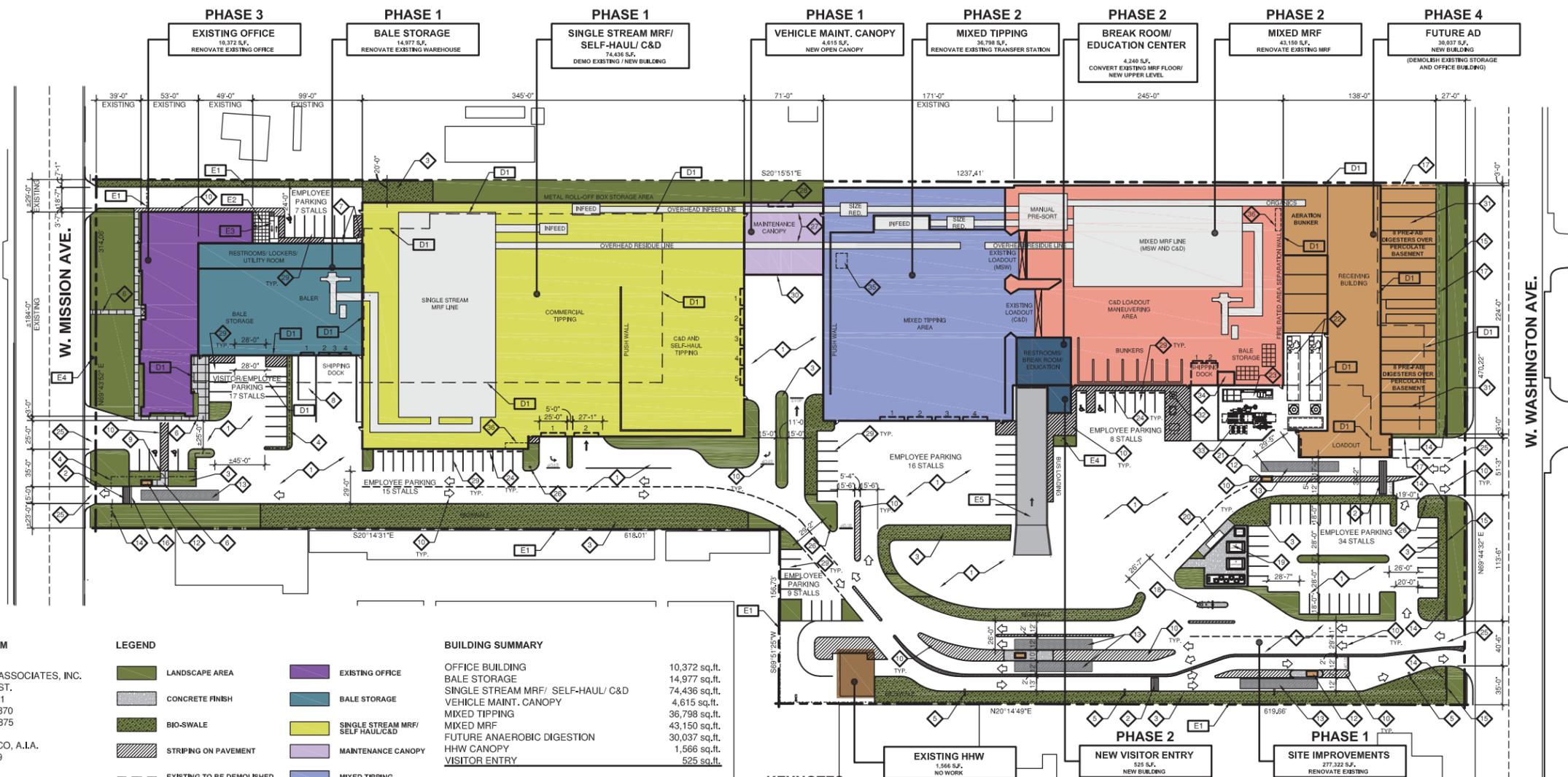


FIGURE 3  
Existing Site Plan



**PROJECT TEAM**

**ARCHITECT**  
 J.R. MILLER & ASSOCIATES, INC.  
 2700 SATURN ST.  
 BREA, CA 92821  
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 FAX: 714.524.1875

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 12721 POWAY RD.  
 POWAY, CA 92064  
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 FAX: 858.679.3416

ALBERT CHERRY  
 CA CE #37980

**LANDSCAPE ARCHITECT**  
 ARCHITERRA DESIGN GROUP, INC.  
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 RANCHO CUCAMONGA, CA 91730  
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 FAX: 909.484.2802

RICHARD KRUMWIEDE  
 CA RLA #2834

**LEGEND**

- LANDSCAPE AREA
- CONCRETE FINISH
- BIO-SWALE
- STRIPING ON PAVEMENT
- EXISTING TO BE DEMOLISHED
- EXISTING OFFICE
- BALE STORAGE
- SINGLE STREAM MRF/ SELF-HAUL/C&D
- MAINTENANCE CANOPY
- MIXED TIPPING
- MIXED MRF
- FUTURE AD
- VISITOR ENTRY
- EXISTING HHW

**SITE COVERAGE**

TOTAL LOT SITE	495,469 sq.ft.
TOTAL BUILDING COVERAGE	214,910 sq.ft.
TOTAL LANDSCAPE COVERAGE	61,335 sq.ft.
TOTAL HARDSCAPE COVERAGE	219,224 sq.ft.
PERCENTAGE BUILDING COVERAGE	43.4%
PERCENTAGE LANDSCAPE COVERAGE	12.3%
PERCENTAGE HARDSCAPE COVERAGE	44.3%

**BUILDING SUMMARY**

OFFICE BUILDING	10,372 sq.ft.
BALE STORAGE	14,977 sq.ft.
SINGLE STREAM MRF/ SELF-HAUL/ C&D	74,436 sq.ft.
VEHICLE MAINT. CANOPY	4,615 sq.ft.
MIXED TIPPING	36,798 sq.ft.
MIXED MRF	43,150 sq.ft.
FUTURE ANAEROBIC DIGESTION	30,037 sq.ft.
HHW CANOPY	1,566 sq.ft.
VISITOR ENTRY	525 sq.ft.
<b>TOTAL</b>	<b>216,476 sq.ft.</b>

**PARKING ANALYSIS**

OFFICE BUILDING	(1:300)	35 STALLS
BALE STORAGE	(1:3,000)	5 STALLS
SINGLE STREAM MRF/ SELF-HAUL / C&D	(1:3,000)	25 STALLS
VEHICLE MAINT. CANOPY	(1:3,000)	2 STALLS
MIXED TIPPING FLOOR	(1:3,000)	12 STALLS
MIXED MRF	(1:3,000)	15 STALLS
FUTURE ANAEROBIC DIGESTION	(1:3,000)	10 STALLS
<b>TOTAL REQUIRED</b>		<b>104 STALLS</b>
<b>PROVIDED</b>		<b>106 STALLS</b>

**KEYNOTES**

- ◆ CONCRETE PAVING
- ◆ STEEL TRENCH COVER CONCRETE PIT
- ◆ BIO-SWALE/LANDSCAPE AREA. SEE CIVIL & LANDSCAPE PLANS
- ◆ 8'-0" HIGH CHAIN LINK FENCE
- ◆ 25'-0" HIGH LIGHT POLE
- ◆ DECORATIVE PEDESTRIAN CONCRETE WALK
- ◆ ACCESSIBILITY CONCRETE STAIR & RAMP
- ◆ VEHICLE CONCRETE RAMP
- ◆ CHAIN LINK SWING GATE
- ◆ PAVEMENT MARKING PAINT CAUTION YELLOW
- ◆ CHAIN LINK SLIDING GATE
- ◆ PRE-FABRICATED SCALE HOUSE
- ◆ TRUCK SCALE OVER CONCRETE PIT. SEE CIVIL PLANS
- ◆ 8'-0" HIGH WROUGHT IRON SLIDING GATE
- ◆ 8'-0" HIGH DECORATIVE CMU WALL
- ◆ MOTORIZED SECURITY ARM GATE
- ◆ METAL SCREEN WALL ABOVE. SEE ELEVATIONS
- ◆ CNG FUELING AREA
- ◆ CNG EQUIPMENT AREA
- ◆ AT GROUND DIESEL STORAGE TANK (CAPACITY: 1,500 GALLONS)
- ◆ EQUIPMENT CMU SCREEN WALL
- ◆ BIO-FILTER
- ◆ BIO-GAS/CHILLER SKID
- ◆ CONCRETE WHEEL STOP
- ◆ DRIVEWAY APPROACH
- ◆ FIRE HYDRANT
- ◆ OVERHEAD CONVEYOR WITH 17' MIN CLEARANCE BELOW CONVEYOR
- ◆ 20' WIDE X 17' HIGH ROLL-UP DOOR FOR EASEMENT ACCESS
- ◆ 9' X 18' PARKING SPACE
- ◆ 30' CLEAR AT UNDERSIDE OF CANOPY
- ◆ PERCOLATE BASEMENT (APPROXIMATELY 8'-0" DEEP)
- ◆ BIOGAS COMBUSTION FLARE
- ◆ COMBINE HEAT & POWER UNIT
- ◆ ELECTRICAL ROOM
- ◆ MOBILE GRINDER
- ◆ HAZARDOUS WASTE STORAGE W/ INTEGRAL CONTAINMENT

**EXISTING KEYNOTES**

(EXISTING ITEMS TO REMAIN, UNLESS OTHERWISE NOTED)

- ◆ E1 CHAIN LINK FENCE/GATE
- ◆ E2 RAISED COVER PATIO
- ◆ E3 WOOD STAIR & RAMP
- ◆ E4 FIRE HYDRANT
- ◆ E5 CONCRETE RAMP

**DEMOLITION KEYNOTES**

◆ D1 DASHED LINES INDICATE EXISTING BUILDING/AREA TO BE DEMOLISHED PRIOR TO START CONSTRUCTION PHASES



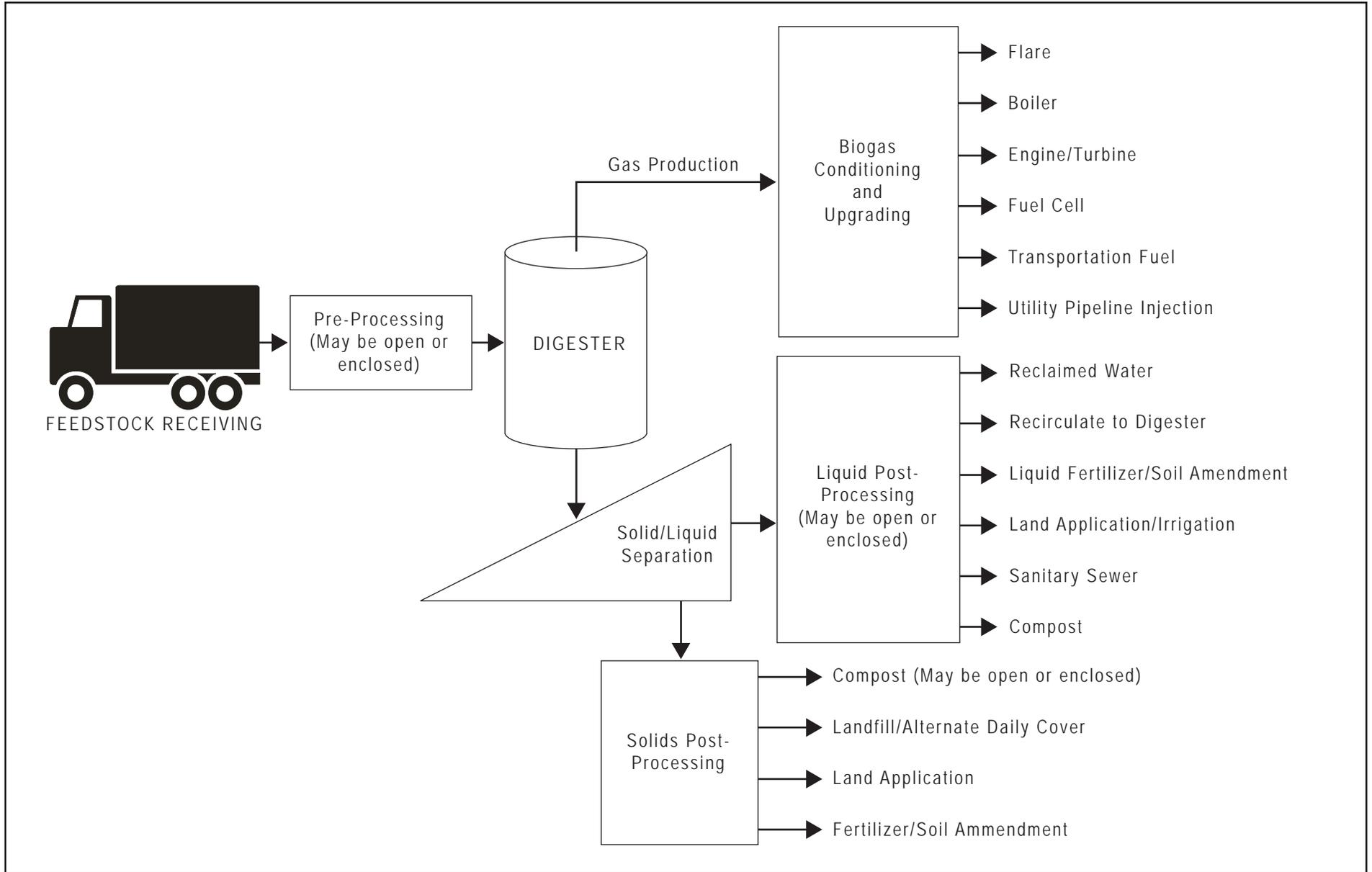


FIGURE 5

Anaerobic Digestion of Organic Waste

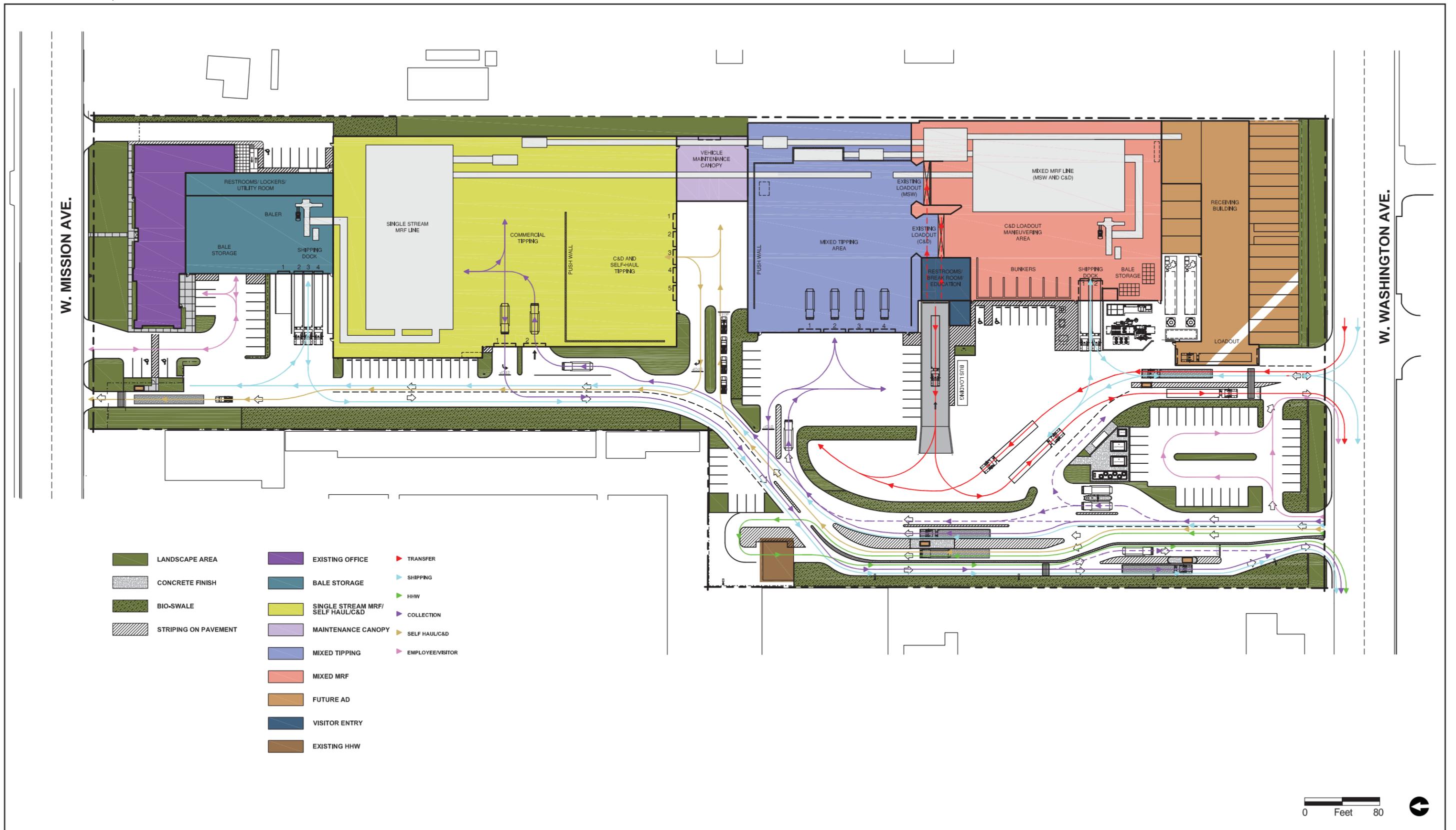


FIGURE 6  
Circulation Plan

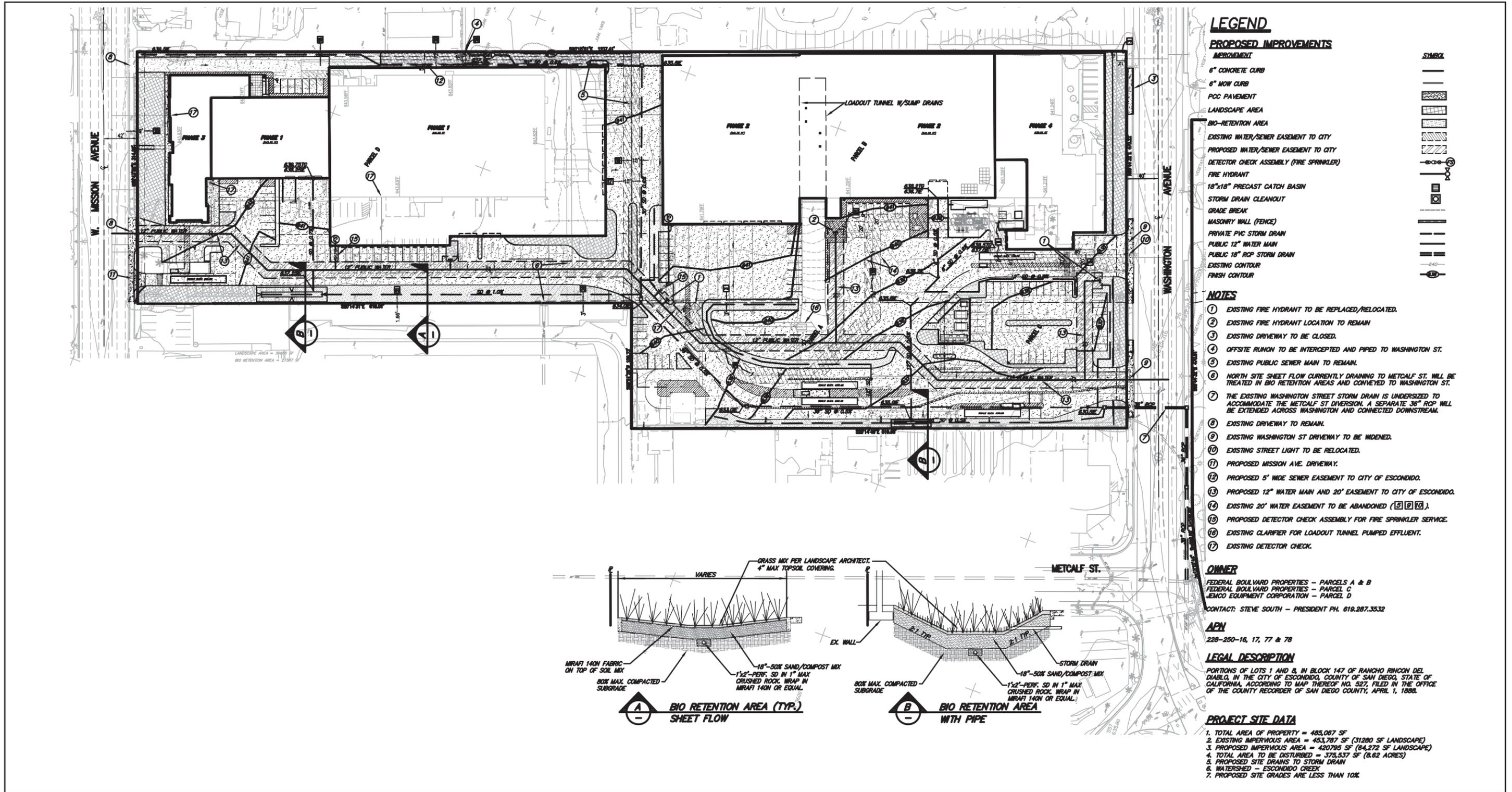






FIGURE 9  
Locations and Dates of Additions

## MITIGATION MONITORING PROGRAM

PROJECT NAME: Escondido Disposal Incorporated Master Plan

PROJECT LOCATION: 1044 W. Washington Avenue and 1021 W. Mission Avenue

PROJECT DESCRIPTION: Conditional Use Permit (to reconfigure the existing waste facility and add an anaerobic digester)

APPROVAL BODY/DATE: City Council

CONTACT: Rozanne Cherry, City Planning Division

PHONE NUMBER: 760.839.4536

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Potential impact to raptors protected by the California Department of Fish and Wildlife, and potential impact to nesting birds protected by the Migratory Bird Treaty Act	<b>BIO-1:</b> A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.	Section IVa, Biological Resources	Applicant		
	<b>BIO-2:</b> If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.	Section IVa, Biological Resources	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Potential impact to unknown subsurface archaeological resources	<p><b>ARC-1:</b> A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.</p>	Section Vb, Cultural Resources	Applicant		
Potential impact to unknown subsurface paleontological resources	<p><b>PAL-1:</b> Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:</p> <ul style="list-style-type: none"> <li>• A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).</li> <li>• In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil</li> </ul>	Section Vc, Cultural Resources	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
	<p>remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.</p> <ul style="list-style-type: none"> <li>• A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.</li> </ul>				
Disturbance of asbestos-containing materials during demolition and renovation activities.	<p><b>HAZ-1:</b> Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.</p>	Section VIIIa, Hazards and Hazardous Materials	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Disturbance of lead-containing materials during demolition and renovation activities.	<b>HAZ-2:</b> Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services-certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).	Section VIIIa, Hazards and Hazardous Materials	Applicant		