VIAWEST GROUP
2351 MEYERS AVENUE

City of Escondido

Draft

Initial Study/Mitigated Negative Declaration
City File No. PL20-0654

August 2022

McKENNA LANIER GROUP, INC. DBE, WBE, SB Micro
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McKENNA LANIER GROUP, INC.

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A. Project Case Number(s):

PL20-0654

B. Project Title:

ViaWest Group – 2351 Meyers Avenue

C. Public Comment Period:

August 19, 2022 – September 19, 2022

D. Lead Agency:

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F. Project Sponsor:

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G. Project Location:

The 4.26-acre vacant property is located within the westerly portion of the City of Escondido, County of San Diego, addressed at 2351 Meyers Avenue and between E. Barham Drive to the north and Corporate Drive to the south. The project site comprises Tax Assessor parcel numbers – APNs 228-312-05-00 and 228-312-06-00.

H. General Plan:

The General Plan land-use designation for the site is Light Industrial (LI), which accommodates various activities in an industrial environment. The LI designation allows a maximum intensity/floor area ratio (FAR) of 1.0, no maximum lot size, and building heights of one (1) to four (4) stories. Per the Escondido General Plan Land Use and Community Form Element, page II-27, land uses include "*Manufacturing, warehousing, distributing, assembling, and wholesaling in a setting more restrictive than the General Industrial land use designation. This includes sites for lighter industrial and office uses which can comply with the stricter development requirements of the Light Industrial (M-1) and Industrial Park (I-P) zone*."

I. Zoning:

The site is zoned P-D – Planned Development – Industrial Zones, with a previous zoning designation of Light Industrial (M-1). Per Article 26 – Industrial Zones Section 33-560 – Purpose of this Chapter of the Municipal Code, the Light Industrial (M-1) Zone is intended "*to provide for a variety of light industrial firms engaged in processing, assembling, manufacturing, storage warehousing and distribution, research and development, and other light industrial uses not typically suited to commercial zones by virtue of operational characteristics and space needs. Necessary support and service uses are also permitted. In order to ensure compatibility among a variety of uses, M-1 development standards are more restrictive than the general industrial zone. Outdoor storage is permitted as an accessory use, but is limited in scale.*"

Per Article 19 – Planned Development (P-D) Zone Section 33-400 – Purpose, "*the planned development (P-D) zone designation has the following purposes:*

(a) Encouraging the development of parcels with comprehensive site planning and building design;

(b) Providing a more flexible regulatory procedure by which the basic public purposes of the Escondido general plan and development policies may be accomplished for specific parcels;

(c) Encouraging creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of several land uses and the design of facilities;

(d) Promoting and creating public and private open space as an integral part of land development design;

(e) Encouraging private development of older areas of the city or areas which are not conducive to development under traditional zoning designations;

(f) Enhancing and preserving property with unique features, such as historical significance, sensitive biological resources, or unusual topography and landscape features."

J. Surrounding Land Uses and Setting:

	Land Use	General Plan	Zoning
Project Site	**Vacant**	**Light Industrial**	**M-1 PD-1**
North	Private Storage System – Self-Storage	Light Industrial	M-1/M-2 – Light Industrial and General Industrial
South	AGM – Products Motor-sports & PAR Electrical Contractors	Light Industrial	M-1 – Light Industrial
East	Lennox Stores HMT Electric, Inc & Industrial Office Complex	Light Industrial	M-1 – Light Industrial
West	Casitas Del Sol Mobile Home Park, Lennar at Amber and Jade at Sunrise Homes in San Marcos	City of San Marcos Low-Density Residential – LDR Sunrise Specific Plan	City of San Marcos Mobile Home Park – R-MHP Multi-Family Residential

K. Description of the Site and Project:

Environmental Setting

In general, the property is located in a light industrial area. Access to the site is provided by Meyers Avenue along the eastern boundary of the site. Meyers Avenue is a non-classified street (60' existing right-of-way). To the north, the property is bounded by a self-storage facility with recreational vehicle (RV) storage, Barham Drive, and State Route 78 (SR-78) beyond. To the south, the subject property is bounded by light industrial development. Meyers Avenue bounds the subject property to the east, with light industrial and some commercial development beyond. The subject property is bounded by a new residential community (under construction) and a mobile home park to the west.

Per the Phase I Environmental Site Assessment (Appendix 12), the site has historically been vacant. Adjacent properties have predominately consisted of residential and light industrial/commercial uses from as early as 1967, increasing over time. The southern half of the site has previously been disturbed and is currently being used as a construction staging area.

It is noted that the northwest quadrant of the site was an orchard from approximately 1964 until the trees deteriorated and were removed around 2018. The property generally slopes from the southwest to the northeast and ranges from approximately 732 to 700 feet above average mean sea level.

"*Modern climate conditions within the project area consist of a Mediterranean climate, with average rainfall of nine to ten inches a year, generally from January through March. Soils within the project area consist of Tujunga sand at 0 to 5% slopes, Terrace escarpments, and lagoon water (USDA 2020)"* page 2, Cultural Resources Study (Appendix 5).

The existing drainage condition consists of a high point located at the property's southwest corner. Runoff from the site sheet flows to the northeast toward Meyers Avenue. Stormwater is collected in the existing curb and gutter along the west side of Meyers Avenue. It flows north to an existing curb inlet located at the intersection of Meyers Avenue and E. Barham Drive. The existing City storm drain infrastructure drains north to an

existing open channel that ultimately discharges to San Marcos Creek and then into Lake San Marcos.

A residential condominium project is currently under construction on the adjacent property to the southwest of the existing site. The residential project has been approved by the Cities of San Marcos and Escondido. As part of the residential condominium project, the proposed grading includes new access drives along the southern and western property boundaries. Existing off-site drainage will be intercepted by curb, gutters, and proposed storm drains within these access drives and will not flow onto the project site. All off-site drainage from the south is intercepted and conveyed to a 36" RCP storm drain proposed in Meyers Avenue per Grading and Improvement Plan GP19-0016 and P19-0014. All off-site drainage from the west is intercepted and conveyed to a proposed storm drain in (Future) Sunrise View and Barham Drive per Improvement Plan Numbers IP20-00007 and P19-0014.

Project Description

The project is the development of a 67,300-square-foot industrial building on a 4.26-acre vacant site. The building includes 6,000 square feet of office on the first floor and 6,000 square feet of office space on the mezzanine. The other 55,300 square feet are divided into 33,650 square feet of manufacturing area and 21,650 square feet of warehousing area. The building is not anticipated to be used for refrigerated warehousing; therefore, Transport Refrigeration Unit (TRUs) trucks would not be expected at the site.

The project will take access from a single ingress/egress driveway off Meyers Avenue with a two-way driveway that loops around the building for cars and light-duty trucks. Larger trucks will enter and exit the site in a single one-way design.

The following project design considerations are also being proposed.

- One hundred and fifty-one (151) parking spaces, including:
  - Eight (8) accessible spaces.
- Eighteen future electric vehicle charging spaces, including:
  - One (1) standard accessible space
  - One (1) van accessible space.
- Twenty-one (21) clean air/vanpool/electric vehicle spaces
- Seven (7) short-term bicycle parking spaces
- Eleven at-grade overhead doors are proposed for loading
- Roof-top exterior equipment is shielded from view with solid parapets that are taller than the equipment constructed with material with a density of at least 4lb/ft$_2$
- Two (2) trash enclosures
- One (1) monument sign
- Split Face CMU Six (6) foot high Sound/Screen Wall
- Retaining Wall
- Seat Wall
- Table/Chairs/Umbrellas

Construction Characteristics

Construction is estimated to last between 16 to 20 months. Grading is anticipated to include 28,000 cubic yards of cut to depths of 21 feet, 14,000 cubic yards of fill to depths of 11 feet, and 14,000 cubic yards of export. The export will require approximately 1,000 truckloads.

Grading in the southwest corner of the project area will require cuts to the maximum depths of 21 feet. Geology on the site is listed as tonalite, a granite-like igneous rock. Surficial soils consist of the underlying rock's colluvial and residual weathering products and transition into weathered rock and bedrock. "Bedrock" is considered impractical to excavate if it cannot be ripped for mass grading effectively using a Caterpillar D-9 Dozer with a single shank ripper or equivalent. For trenching, it can be identified with a Caterpillar 375 Excavator equipped with a 24-inch bucket and rock teeth (page 1, Supplemental Geotechnical Report (Appendix 7)). It is expected that this project will not be able to excavate all of the bedrock without blasting. A Blasting Noise and Vibration Evaluation has been prepared (Appendix 10).

The following project grading considerations (project design features) are also required:

- Per Municipal Code Section 17.324, construction will only occur during the permissible hours of 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. and 5:00 p.m. on Saturdays. No construction is permitted on Federal, state, or City holidays.
- The contractors shall ensure all equipment will have the appropriate noise attenuating devices.
- The contractors shall locate the equipment staging areas to create the greatest distance between the construction-related noise/vibration sources and the residential (sensitive receptors) nearest the project site.
- Idling equipment will be turned off when not in use.
- Equipment shall be maintained to secure vehicles and their loads from rattling and banging.

Off-Site Improvements

Wherever necessary, roadways adjacent to the proposed project site and site access point will be constructed in compliance with recommended roadway classifications and respective cross-sections in the City of Escondido General Plan or as directed by the City Engineer.

Sight distance at the project access point will be reviewed with respect to standard City sight distance standards at the time of final grading, landscaping, and street improvement plans. Meyers Avenue will be striped red "No Parking" at the corner radius opposite the driveway entrance (along the street frontage of APN 228-312-17-00) to ensure appropriate sight distance at the project driveway. Signing/striping will be implemented in conjunction with detailed construction plans for the project site.

The project includes preliminary grading, drainage, and best management practices (BMPs) for water quality.

L. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to AB 52 (Gatto, 2014) and Public Resources Code § 21080.3.1, the City of Escondido sent a 30-day notification letter on May 19, 2022, to the following tribes:

- San Luis Rey Band of Mission Indians
- Soboba Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Mesa Grande Band of Diegueño Mission Indians
- San Pasqual Band of Mission Indians

The Rincon Band of Luiseño Indians responded on June 5, 2022, requesting a consultation with the City. The San Luis Rey Band of Mission Indians responded on June 6, 2022, requesting a consultation with the City. The City consulted with the Rincon Band of Luiseño Indians representative on July 5, 2022, and with the San Luis Rey Band of Mission Indians representative on June 30, 2022. Through the consultation process, mitigation measures were prepared for inclusion within this environmental analysis, as noted in Section XVIII – Tribal Cultural Resources.

M. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

1. Statewide Construction General Permit
2. Regional Water Quality Control Board
3. Rincon del Diablo Municipal Water District
4. City of Escondido - Sewer
5. San Diego Gas and Electric
6. AT&T
7. Cox Communications
8. San Diego County Air Pollution Control District

N. Appendices (Found as Separate Documents and Incorporated by Reference into this IS/MND Pursuant to CEQA Guidelines Section 15150):

1. Architectural Drawings
2. Civil Drawings
3. Meyers Avenue Industrial Project – Air Quality, Greenhouse Gas (GHG), and Energy Impact Evaluation, City of Escondido, CA, prepared by MD Acoustics LLC, June 2, 2022

4. Biological Resources Technical Report for 2351 Meyers Avenue, Escondido, California, prepared by Dudek, July 2021
5. Cultural Resources Study for 2351 Meyers Avenue Project (Tentative Parcel Map P18-00011), Escondido, California, prepared by Red Tail Environmental, December 2, 2020
6. Geotechnical Evaluation, Proposed Meyers Avenue Industrial Building Meyers Avenue South of Barham Drive, Assessor's Parcel Number (APN) 228-312-05-00, City of Escondido, County of San Diego, California, prepared by EEI Engineering Solutions, November 02, 2020
7. Supplemental Geotechnical Report, New Industrial Building, 2351 Meyers Avenue, Escondido, California, Partner Project No. 21-345508.1, prepared by Partner, November 18, 2021
8. Preliminary Hydrology and Hydraulics Study, for Meyers Industrial PL20-0654, Meyers Avenue, Escondido, CA 92029. APN: 228-312-05-00, prepared by Pasco Laret Suiter & Associates, Inc., April 10, 2022
9. Meyers Industrial Facility Noise Impact Study City of Escondido, CA, prepared by MD Acoustics LLC, August 5, 2022
10. Meyers Avenue Industrial Warehouse Project – Blasting Noise and Vibration Evaluation, prepared by MD Acoustics LLC, June 2, 2022
11. Paleontological Resources Desktop Review: Orix-Sunrise Due Diligence Project, Prepared by Dudek, August 7, 2017
12. Phase I Environmental Site Assessment, 4.94-acre Undeveloped Property, Assessor's Parcel Number 228-312-05-00, 2351 Meyers Avenue, City of Escondido, San Diego County, California 92029, prepared by TA-Group DD, LLC, November 23, 2021
13. City of Escondido Priority Development (PDP) SWQMP, Meyers Industrial Record ID (Permit) Numbers: PL20-0654, prepared by Pasco Laret Suiter & Associates, Inc., April 10, 2022
14. Transportation Impact Analysis & Local Mobility Analysis Meyers Industrial Escondido, California, prepared by Linscott Law & Greenspan Engineers, April 7, 2022

O. Acronyms:

ACM -	Asbestos Containing Materials
ACCM -	Asbestos Construction Containing Materials
ADA -	American with Disabilities Act
ALUC -	Airport Land Use Commission
ALUCP -	Airport Land Use Compatibility Plan
AQMP -	Air Quality Management Plan
BMP -	Best Management Practice
CAP -	Climate Action Plan
CAPCOA -	California Air Pollution Officers Association
CARB -	California Air Resources Board
CEQA -	California Environmental Quality Act
CIWMD -	California Integrated Waste Management District
CMP -	Congestion Management Plan
CNEL -	Community Noise Equivalent Level
CUP -	Conditional Use Permit
dB -	Decibel
dBA -	A weighted sound level

DOSH - Division of Occupational Safety and Health Administration
DOT - Department of Transportation
DP - Development Plan
DTSC - Department of Toxic Substance Control
DWR - Department of Water Resources
EFD - Escondido Fire Department
EIR - Environmental Impact Report
EPD - Escondido Police Department
EOP - Emergency Operations Plan
EUSD - Escondido Union School District
FAA - Federal Aviation Agency
FEMA - Federal Emergency Management Agency
FHWA - Federal Highway Administration
FMMP - Farmland Mapping and Monitoring Program
GIS - Geographic Information System
GHG - Greenhouse Gas
GP - General Plan
GPU - General Plan Update
HARRF - Hale Avenue Resources Recovery Facility
HCM - Highway Capacity Manual
HCOC - Hydrologic Conditions of Concern
HCP - Habitat Conservation Plan
HRA - Health Risk Assessment
IS - Initial Study
LBP - Lead-Based Paint
LEQ - Equivalent Sound Level
LHMP - Local Hazard Mitigation Plan
LID - Low Impact Development
LOS - Level of Service
LST - Localized Significance Threshold
MBTA - Migratory Bird Treaty Act
MCUP - Minor Conditional Use Permit
MM - Mitigation Measure
MHCP - Multiple Habitat Conservation Plan
MSCP - Multiple Species Conservation Plan
MWD - Metropolitan Water District
NAHC - Native American Heritage Commission
NCCP - Natural Communities Conservation Plan
NOI - Notice of Intent
NPDES - National Pollutant Discharge Elimination System
OEM - Office of Emergency Services
OSHA - Occupational Health and Safety Administration
OPR - Office of Planning & Research, State
PEIR - Program Environmental Impact Report
PPV - Peak Particle Velocity
PW - Public Works
PWQMP - Preliminary Water Quality Management Plan
RAQS - Regional Air Quality Strategy
RCP - Regional Comprehensive Plan

RDD -	Rincon del Diablo Municipal Water District
RMS -	Root Mean Squared
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RWQCB -	Regional Water Quality Control Board
SANDAG -	San Diego Association of Governments
SCAG -	Southern California Association of Governments
SCH -	State Clearinghouse
SCS -	Sustainable Community Strategy
SDAB -	San Diego Air Basin
SDAPCD -	San Diego Air Pollution Control District
SDG&E -	San Diego Gas & Electric
SEIR -	Supplemental Environmental Impact Report
SWPPP -	Storm Water Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
TAC -	Toxic Air Contaminant
UBC -	Uniform Building Code
USFWS -	United States Fish and Wildlife
USGS -	United States Geologic Survey
UWMP -	Urban Water Management Plan
VdB -	Vibration Level for a Vibration Source
VMT -	Vehicle Miles Traveled
WQMP -	Water Quality Management Plan

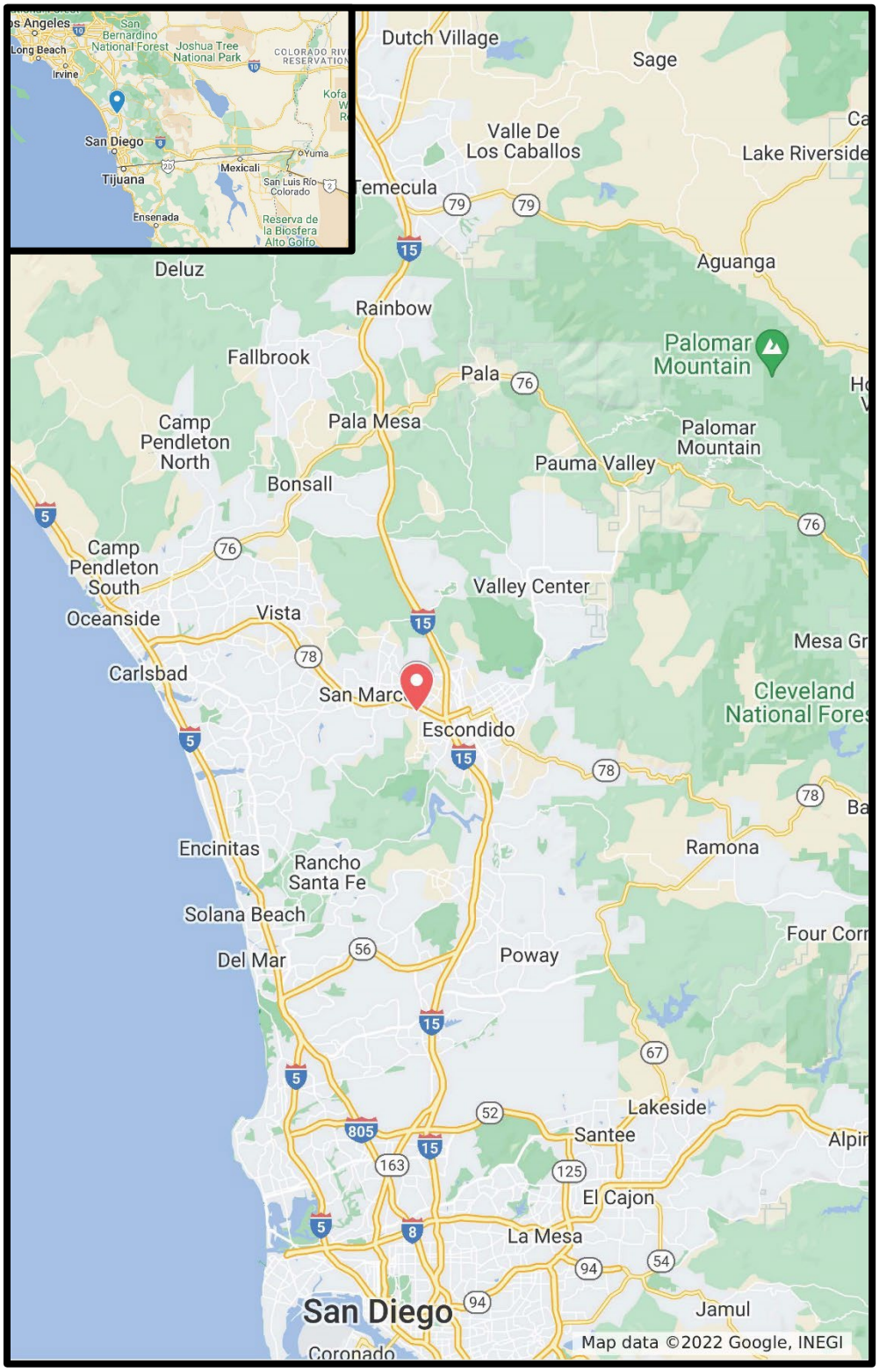


Figure 1 - Location Map

Figure 2 - Aerial

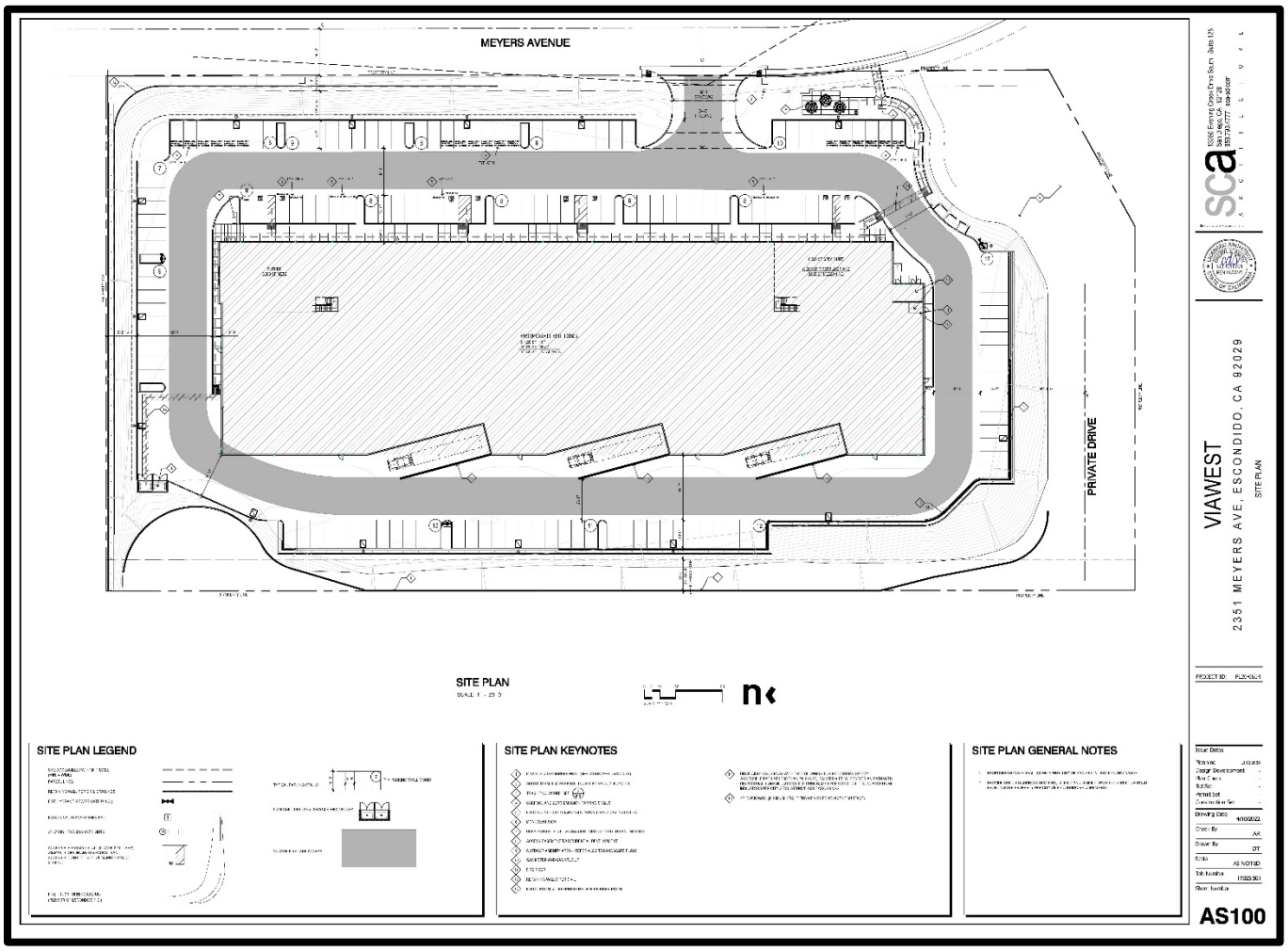


Figure 3 - Site Plan

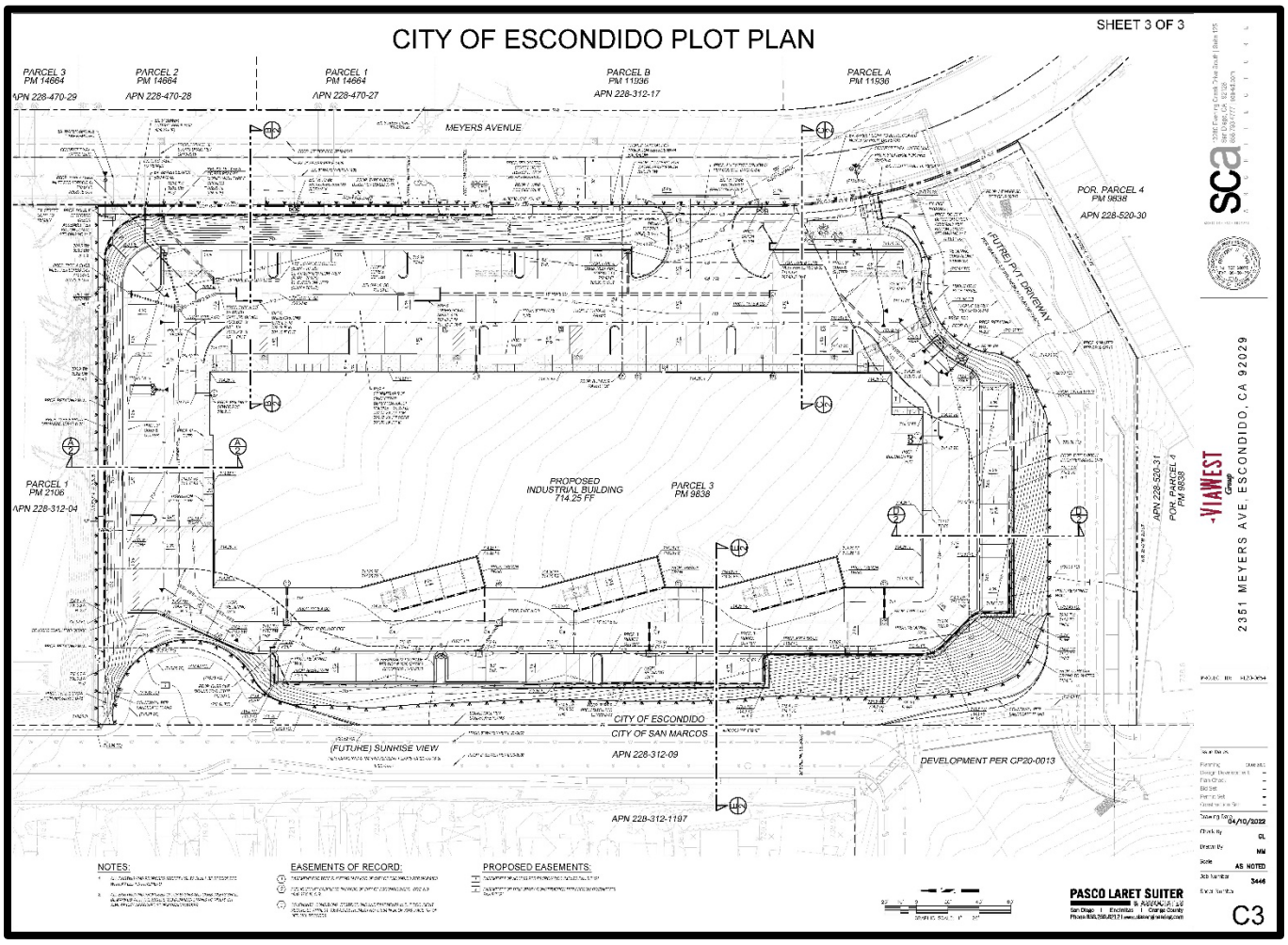


Figure 4 - Grading Plan

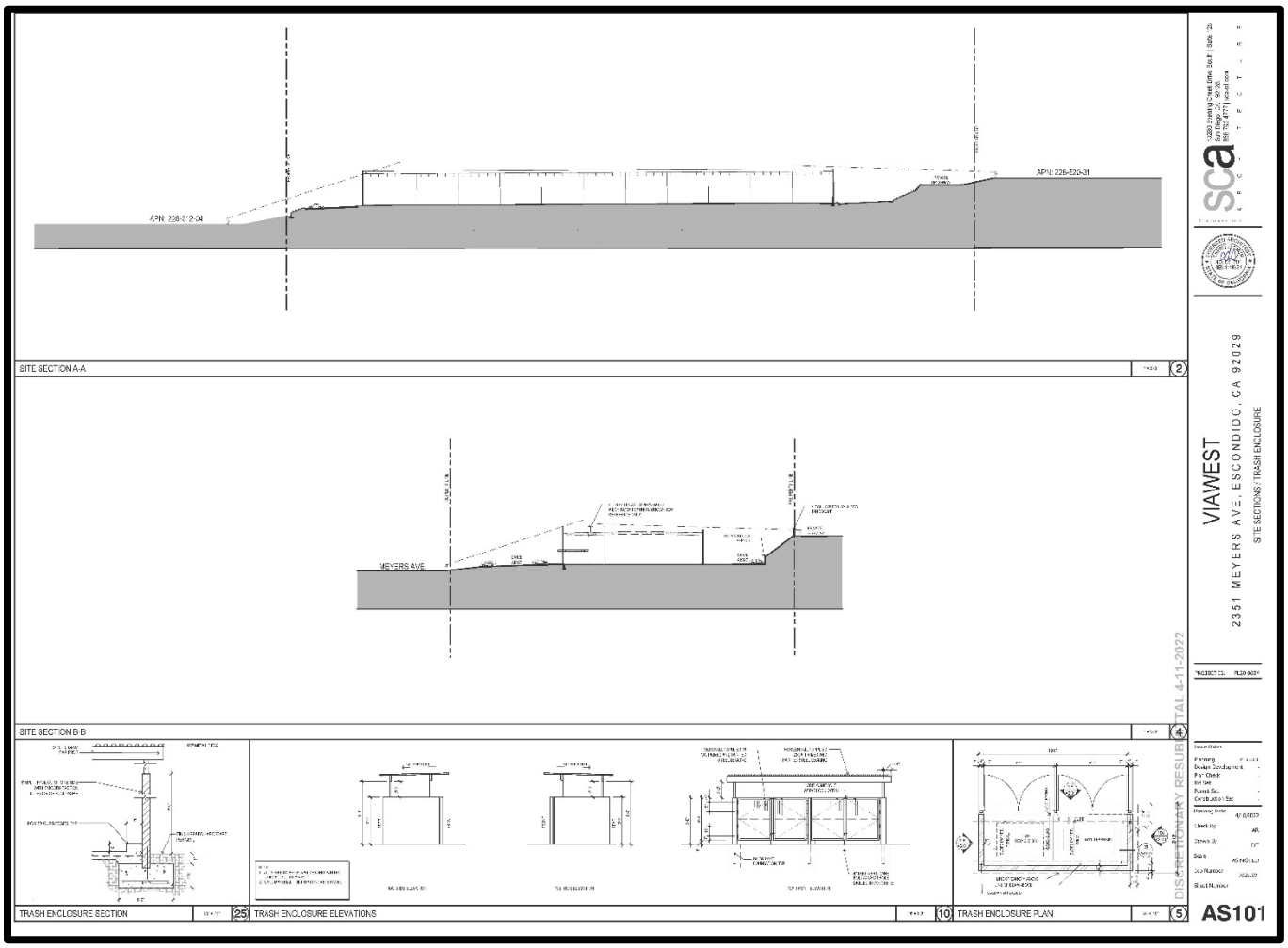


Figure 5 - Cross Sections

Figure 6 - Elevations

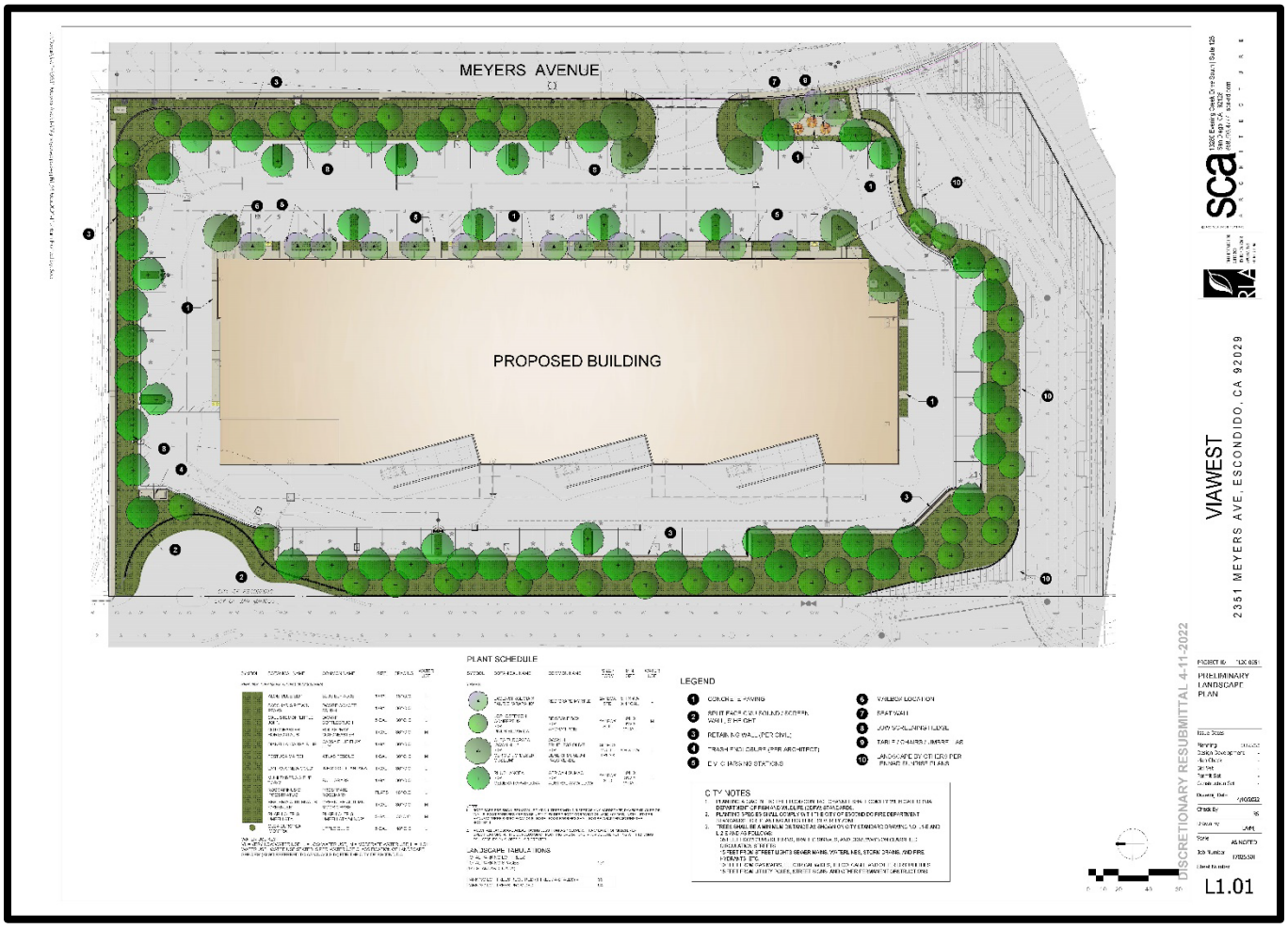


Figure 7 - Preliminary Landscape Plan

Figure 8 - Photos

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

V. DETERMINATION (To be completed by the Lead Agency):

Based on this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, 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, nothing further is required.

Signature: *JPaul*	Date: August 19, 2022
Printed Name: Jay Paul, Senior Planner	For

VI. EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation 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. A "No Impact" answer is adequately supported if the referenced information sources 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) 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 XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another 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 Analyses Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an 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.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (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.

7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

A. Issues & Supporting Information Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – **Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Aesthetics 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones ➢ Article 5 – Open Space Development Standards ➢ Article 35 – Outdoor Lighting 4. CalTrans Scenic Highways – Accessed May 22, 2022				

a) Have a substantial adverse effect on a scenic vista?

The City of Escondido is set in a series of valleys surrounded by visually distinctive hillsides and ridgelines. The hillsides and ridges are considered visually prominent in views from the valley floor. The area's natural setting provides many opportunities for views from surrounding higher elevations. The project site is undeveloped and located within an urban area developed with industrial development to the north, south, and east and residential development to the west in the City of San Marcos. Due to the surrounding development, landscaping (mature trees), and varying topography throughout the area, the proposed project site is generally concealed from views from area roadways and the surrounding neighborhoods, except for immediately adjacent development and the residential properties to the west, that are situated at a higher elevation.

As discussed under the environmental setting, the project site is vacant, and the topography of the project site is gently sloping and generally is situated at a similar or slightly higher elevation than adjacent Meyers Avenue on the east. Any potential

scenic vistas in the proposed project viewshed would consist of distant views of mountains and ridgelines generally located towards the east and northern areas of the City and County. Views of the proposed project primarily would be from travelers along Meyers Avenue and existing adjacent development. The area's setting/topography generally only provides opportunities for views from surrounding higher elevations.

The proposed project would develop the existing vacant site with an industrial building that would be constructed to conform to the site topography per the City's Grading Ordinance and design criteria. The industrial development has the potential to impact views of distant mountains and ridgelines with the development of industrial buildings along with the installation of associated landscaping. The industrial development would not affect scenic vistas from Meyers Avenue looking north and east because distant views from this vantage point are already limited by existing buildings and mature trees in the foreground. Development of the industrial building would be subject to the height requirements, lot coverage, and setbacks for the M-1 zone. For these reasons, the proposed project would not significantly impact scenic vistas of distant ridgelines and hilltops, unique landforms, visual gateways, edges of the community, or scenic resources identified as significant in the General Plan (2012). Therefore, the project would have a **less than significant impact** on any valuable scenic vista. It would not result in a substantial change in the scenic views available in the surrounding area.

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

A CalTrans Scenic Highways Program review found no state scenic highways designated in the City of Escondido. In addition, none of the City identified scenic roadways are close to the project area. Therefore, the project will have **no impact** directly, indirectly, or cumulatively on scenic resources within a state or City designated scenic highway/corridor.

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

The project site is located in an urbanized area and does not conflict with the zoning or other regulations governing scenic quality.

Construction Impacts

The City does not have specific regulations to mitigate visual construction impacts. However, construction-related impacts would be short-term and temporary as construction activity would not be continuous.

Operational Impacts

The project site is in an urbanized area within the M-1 – Light Industrial and P-D – Planned Development – Industrial Zones. Meyers Avenue and parcels to the north, south, and east are developed with various industrial/commercial type structures and uses. The project site is visible from the residential uses to the west, as the residential sites are at a higher elevation than the subject site. The proposed project involves the development of the property with an industrial building, surface parking, grading, right-of-way improvements, screen walls along the western property boundary, and landscaping that would be consistent in size and character with other industrial development throughout the industrial area. The proposed industrial development would replace an existing vacant property with limited vegetation cover.

The property is subject to compliance with the general development and design standards and parameters outlined in Chapter 33 – Zoning of the Municipal Code. The development standards of the Industrial Zone (Section 33-569 Development Standards) address development factors that would influence the visual character/quality of the development site and its surroundings. Namely, setbacks, lot area, landscaping, building height, and lighting, to name a few. Overall, the industrial development would improve the site's visual quality relative to the existing condition and would be consistent with the character of surrounding developments. In summary, the project will comply with the applicable zoning and other regulations governing scenic quality. In addition, both indirectly and cumulatively, the project would not conflict with appropriate zoning and other regulations governing scenic quality. As designed and conditioned, the project will have a **less than significant impact,** directly, indirectly, or cumulatively, on the existing visual character.

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

Existing lighting sources in the surrounding area generally consist of streetlights, industrial/commercial and residential structure lights, and vehicle headlights. Development of the site with an industrial building/use and infrastructure typically would include exterior lighting for safety, security, and circulation purposes. Various exterior lighting fixtures, including pole-mounted streetlights and wall-mounted lights, would be used. However, these lighting sources and the proposed land use would not be inconsistent with existing surrounding developments. The project will be required to comply with Article 35 – Outdoor Lighting of the Municipal Code. These standards require lighting to be shielded and directed away from neighboring properties. All proposed exterior lighting would be designed, arranged, directed, or shielded in such a manner as to contain direct illumination on-site, in accordance with the development standards for light and glare control in the Municipal Code. Focusing lights where they are needed for public safety and direction reduces potential light pollution and glare.

Adherence to the City's provisions and other existing regulations and implementation of the policies of the General Plan will ensure that nighttime light and daytime

glare from the project will be minimized and no significant impacts will occur. As designed and conditioned, the impacts of lighting and glare will be **less than significant,** directly, indirectly, and cumulatively.

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

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Agricultural Resources
   - Figure 4.2-1 – FMMP Resources
   - Figure 4.2-2 – Prime Agricultural Soils
   - Figure 4.2-3 – Williamson Act Contract Lands
   - Figure 4.2-4 – Potential Forest Resources
   - Figure 4.2-5 – Agricultural Resources
   - Figure 4.2-6 – Sensitive Agricultural and Biological Resources
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Farmland Mapping and Monitoring Program – Accessed May 22, 2022
5. California Department of Fish and Wildlife, Timberland Conservation Program

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

A review of the Department of Conservation, California Farmland Mapping and Monitoring Program (FMMP) mapping system has found the project site designated as Other Land. Other Land is defined as:

Other Land (X): Land which does not meet the criteria of any other category. Typical uses include low-density rural development, heavily forested land, mined land, or government land with restrictions on use.

The property surrounding the site is mapped as Urban and Built-Up, which is defined as:

Urban and Built-Up land is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water.

Therefore, the project would not affect any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and **no impact,** directly, indirectly, or cumulatively, would occur to farmland.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

The property is zoned M-1 – Light Industrial and P-D – Planned Development – Industrial Zones, which are not intended for agricultural uses and are not under a Williamson Act contract. The project will have **no impact,** directly, indirectly, or cumulatively, on zoning for agricultural use or on a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

As shown in Figure 4.2-4 – Potential Forest Resources of the Escondido General Plan EIR, the project site is not located in a potential forestry resource area. Therefore, the project would not conflict with the existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. The project will have **no impact,** directly, indirectly, or cumulatively.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

There is no commercial forestry or timber production industry on the project site. Therefore, the project would not result in the loss of forest land or the conversion

of forest land to non-forest use. The project will have **no impact,** directly, indirectly, or cumulatively.

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

The northwest quadrant of the site was an orchard from approximately 1964 until the trees deteriorated and were removed around 2018. Due to the adjacent residential and commercial uses, agricultural uses on this site would be problematic. Therefore, the project would not result in the conversion of farmland to non-agricultural use, and it will have **no impact** directly, indirectly, or cumulatively.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Air Quality
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Meyers Avenue Industrial Project – Air Quality, Greenhouse Gas (GHG), and Energy Impact Evaluation, City of Escondido, CA, prepared by MD Acoustics LLC, June 2, 2022 (Appendix 3)

The Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3) that MD Acoustics, LLC prepared on June 2, 2022, has been used to prepare and is quoted throughout this Section.

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

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the San Diego Regional Air Quality Strategy

(RAQS). Therefore, this section discusses any potential inconsistencies of the proposed project with the RAQS.

This discussion aims to set forth the issues regarding consistency with the assumptions and objectives of the RAQS and discuss whether the proposed project would interfere with the region's ability to comply with federal and state air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or the inclusion of mitigation to eliminate the inconsistency.

The RAQS relies on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth in the County, mobile, area, and all other source emissions, to project future emissions and determine strategies necessary for the reduction of stationary source emissions. Those projects that propose development consistent with the City's General Plan are consistent with the RAQS.

According to demographic and socioeconomic estimates provided by the SANDAG Fast Facts, the City of Escondido is forecast to increase the number of jobs by 109 percent between 2000 and 2050, from 49,716 jobs to 74,915 jobs (SANDAG 2011).[1] The project is an industrial use that would include additional employees in the area, and these positions would be expected to be filled by Escondido residents. Because the project is not residential, it would not generate direct population or housing growth. The relatively small employment growth associated with the project would be consistent with SANDAG's employment forecast and the City's General Plan. Therefore, the project is consistent with the RAQS and would have **no impact** on conflicting with or obstructing the applicable air quality plan implementation.

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

Cumulative projects include local development and general growth within the project area. For cumulative impacts from the project, the analysis must specifically evaluate the contribution to the cumulative increase in pollutants for which the San Diego Air Basin (SDAB) is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). If the project does not exceed thresholds and is determined to have less than-significant project-specific impacts, it may still contribute to a significant cumulative air quality impact if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the project would only be considered to have a significant cumulative impact if its contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

[1] https://www.sandag.org/resources/demographics_and_other_data/demographics/fastfacts/esco.htm

The project area is out of attainment for O_3 for federal standards and O_3, PM_{10}, and $PM_{2.5}$ for state standards. Construction and operation of cumulative projects will further degrade the local air quality and the air quality of the SDAB. The construction-related emissions will be below the San Diego Air Pollution Control District's (SDAPCD) significance levels and would not significantly impact air quality. Construction would be short-term and temporary in nature. Once construction is completed, construction-related emissions will cease. Operational emissions generated by the project would not exceed the significance thresholds established by the SDAPCD. Therefore, the proposed project would result in no impacts related to criteria pollutant emission from construction and operation.

The San Diego County Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP) rely on San Diego Association of Government (SANDAG) growth projections, which are based in part on the city and San Diego County (County) general plans. As such, projects that propose development consistent with the growth anticipated by the applicable general plan(s) are consistent with the RAQS and applicable portions of the SIP. It is assumed that a project which conforms to the City's General Plan and does not have emissions exceeding operational thresholds will not create a cumulatively considerable net increase in ozone since the emissions were accounted for in the RAQS. The project proposes to construct a 68,900 square foot industrial building including 51,750 square feet of manufacturing/warehouse use and 17,150 square feet of office use on an approximately 5 -acre site with a land use designation of Light Industrial (LI) and a zoning designation of Planned Development – Industrial (PD-I). Per the General Plan, the LI designation typically provides for a variety of uses in an industrial environment, including light manufacturing, warehouse, distribution, assembly, and wholesale uses; lighter industrial and office type uses are intended as well as industries that generate moderate daytime and minimum nighttime noise levels and require limited or no outside storage and uses that provide supporting products or services for the primary businesses.[2] Therefore, the project would be consistent with the existing general plan and zoning for the City of Escondido; therefore, the project would be considered consistent with the RAQS.

Furthermore, operational emissions generated by the project would be below the established significance thresholds for criteria pollutants. The project's operational emissions would not significantly contribute to the region's poor air quality. Therefore, cumulative air quality impacts would be considered to have a **less than significant impact**.

CO Hot Spot Emissions

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. A sensitivity analysis is typically conducted to determine if the proposed project could cause emission levels in excess of the CO standards. The analysis determines the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume

[2] https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUpdate/GeneralPlanChapterII.pdf

intersections with a Level of Service E or worse. The SDAB is in attainment of state and federal CO standards. Nonetheless, the county requires a CO hotspot analysis if a proposed development would cause road intersections to operate at or below LOS E while exceeding 3,000 peak-hour trips.

The project would generate approximately 602 total trips with 82 morning peak hour trips and 84 evening peak hour trips, as Linscott Law and Greenspan Engineers (2021) estimated. Per the City of Escondido General Plan, Downtown Specific Plan, and Climate Action Plan EIR (2012),[3] the intersection of Nordahl Road/Auto Park Way/Mission Road already operates at LOS E under both the Existing Year 2011 conditions and the Year 2035 conditions for both morning and evening peak hours. In addition, the intersections of Nordahl Road/SR-78 Westbound Ramps and Nordahl Road/SR-78 Eastbound Ramps were identified as operating at LOS C under both the Existing Year 2011 conditions and the Year 2035 conditions during the morning peak hour. During the evening peak hour, the Nordahl Road/SR-78 Westbound Ramps operated at LOS C during Existing Year 2011 conditions and LOS D during the Year 2035 conditions, while the Nordahl Road/SR-78 Eastbound Ramps operated at LOS D during Existing Year 2011 conditions and LOS D during the Year 2035 conditions. Therefore, no signalized intersection near the project site is anticipated to operate at LOS E or worse as a result of the project. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and the project is considered to have a **less than significant impact**.

c) **Expose sensitive receptors to substantial pollutant concentrations?**

Sensitive Receptors

Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution than others due to their exposure. The California Air Resources Board (CARB) identified sensitive population groups, including children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, a sensitive receptor would be a location where a sensitive individual could remain for 24 hours or longer, such as residencies, hospitals, schools (etc.).

The closest existing sensitive receptors (to the site area) are the mobile home park located approximately 50 feet west and the single-family residential uses located approximately 0.18 miles southwest and 0.19 miles southeast.

CalEEMod

Typical emission rates from construction activities were obtained from CalEEMod Version 2020.4.0. The CalEEMod program uses the EMFAC2017 computer program to calculate the emission rates specific for the southwestern portion of San Diego County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck

[3] https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUpdate/Vol1Traffic.pdf

operations. EMFAC2017 and OFFROAD2011 are computer programs generated by CARB that calculate composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Using CalEEMod, the peak daily air pollutant emissions were calculated. These emissions represent the highest level of emissions for each construction phase in terms of air pollutant emissions.

The analysis assesses the emissions associated with the construction of the proposed project. Using CalEEMod default timelines for construction phases and the proposed operational date, the proposed project was modeled as beginning construction in November 2022 with completion by December 2023. However, after a change to the project schedule, construction is now anticipated to begin in March 2023. This does not pose an issue as CalEEMod utilizes EMFAC emission factors which estimate emission rates to decrease over time due to increased efficiencies of equipment and vehicles. The phases of the construction activities which have been analyzed below are 1) grading, 2) building, 3) paving, and 4) architectural coating. For details on construction modeling and construction equipment for each phase, see Appendix A of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3).

The project would be required to comply with SDAPCD Rules 52, 54, and 55, which identify measures to reduce fugitive dust and are required to be implemented at all construction sites located within the SDAB. The requirements to reduce fugitive dust in compliance with SDAPCD Rules 52, 54, and 55 were included in CalEEMod for the grading phase of construction.

The architectural coating phase involves the greatest release of VOCs. The emissions modeling for the project includes the use of low-VOC paint (50 grams per liter [g/L] for not flat coatings for the buildings and 100 [g/L] for parking lot striping) as required by SDAPCD Rule 67.0.1.

Air Quality Thresholds

The SDAPCD has established thresholds in Rule 20.2 for new or modified stationary sources. The County's Guidelines for Determining Significance and Report Format and Content Requirements include screening level thresholds for all County-related Air Quality Impact Assessments (AQIA) and for determining CEQA air quality impacts.[4] These daily screening thresholds for construction and operations are shown in Table 9 below.

Table 9: SDAPCD Air Quality Significance Thresholds

Pollutant	Total Emissions		
	Pounds per Hour	Pounds Per Day	Pounds Per Year
VOCs	-	100	15
NOx	-	55	10*
CO	25	250	40
SOx	25	250	40
PM10	100	550	100

[4] https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf

Table 9: SDAPCD Air Quality Significance Thresholds			
Pollutant	**Total Emissions**		
	Pounds per Hour	**Pounds Per Day**	**Pounds Per Year**
PM2.5	-	3.2	0.6
Lead*	-	75**	13.7***

Notes:
Source: San Diego County. March 2007. County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality. http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf
* EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
** Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2000 lbs/ton.

The thresholds listed above and in Table 9 represent screening-level thresholds that can be used to evaluate whether project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 9, the project could potentially result in a cumulatively considerable net increase in these pollutants. It thus could have a significant impact on the ambient air quality.

CONSTRUCTION EMISSIONS

Temporary Construction Emissions

The construction emissions for the project would not exceed the City's screening level thresholds during project construction, as demonstrated in Table 10, and therefore would be considered **less than significant**. Construction modeling parameters and assumptions can be found in Section 4.1 of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3).

Table 10: Estimated Maximum Daily Construction Criteria Air Pollutant Emissions						
Activity	**Pollutant Emissions[1]**					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Daily Construction Emissions (pounds/day)						
2022 Maximum	2.97	57.75	24.41	0.17	12.04	5.68
2023 Maximum	20.42	16.22	19.05	0.04	1.73	0.95
SDAPCD Screening Threshold	75	250	550	250	100	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**N0**	**No**
Annual Construction Emissions (tons/year)						
2022 Maximum	0.05	0.55	0.45	0.00	0.07	0.03
2023 Maximum	0.38	1.66	1.97	0.00	0.17	0.10
SDAPCD Screening Threshold	13.7	40	100	40	15	10
Exceeds Threshold?	**No**	**No**	**No**	**No**	**N0**	**No**

Notes:
Source: CalEEMod Version 2020.4.0
[1] Grading phases incorporate anticipated emissions reductions required by SDAPCD Rules 52, 54, and 55 to reduce fugitive dust. The architectural coating phases incorporate anticipated emissions reductions required by SDAPCD Rule 67.

Construction-Related Toxic Air Contaminant Impact

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during the

proposed project's construction. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015, to provide a description of the algorithms, recommended exposure variates, cancer, and noncancer health values. The air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances evaluated for cancer risk and/or noncancer acute, 8-hour, and chronic health impacts and identifying any multi-pathway substances that present a cancer risk or chronic noncancer hazard via non-inhalation routes of exposure.

CARB In-Use Off-Road Diesel-Fueled Fleets Regulation limits unnecessary idling to 5 minutes, requires all construction fleets to be labeled and reported to CARB, bans Tier 0 equipment, and phases out Tier 1 and 2 equipment thereby replacing fleets with cleaner equipment, and requires that fleets comply with Best Available Control Technology requirements.

The closest existing sensitive receptors (to the site area) are the existing mobile home park located approximately 50 feet to the west and the existing single-family detached residential dwelling units located approximately 0.18 miles (~290 meters) southwest and 0.19 miles (~305 meters) southeast of the project site.

Given the relatively limited number of heavy-duty construction equipment and construction schedule, the proposed project can qualitatively be determined to not result in a substantial long-term source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during the proposed project's construction, and the project would have a **less than significant impact**.

OPERATIONAL EMISSIONS

The operations-related criteria air quality impacts created by the proposed project have been analyzed using the CalEEMod model. The operating emissions were based on the year 2023, which is the anticipated opening year for the project. The summer and winter emissions created by the proposed project's long-term operations were calculated, and the highest emissions from either summer or winter are summarized in Table 10. Emissions were modeled according to the parameters and assumptions established in Section 4.2.

Table 10: Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)[1]					
	VOC	NOx	CO	SO2	PM10	PM2.5
Area Sources[2]	1.63	0.00	0.02	0.00	0.00	0.00
Energy Usage[3]	0.01	0.12	0.10	0.00	0.01	0.01
Mobile Sources[4]	1.74	1.90	15.62	0.03	3.34	0.91
Total Emissions	**3.38**	**2.01**	**15.74**	**0.03**	**3.35**	**0.92**
SDAPCD Screening Level Thresholds	**75**	**250**	**550**	**250**	**100**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Table 10: Estimated Maximum Daily Operational Criteria Air Pollutant Emissions						
	Pollutant Emissions (pounds/day)[1]					
Activity	VOC	NOx	CO	SO2	PM10	PM2.5

[1] Source: CalEEMod Version 2020.4.0
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from on-site natural gas usage.
[4] Mobile sources consist of emissions from vehicles and road dust.

The data in Table 10 shows that emissions from the operation of the proposed project do not exceed SDAPCD thresholds. Therefore, the impact is considered **less than significant**.

HEALTH RISK ASSESSMENT

The ongoing operation of the proposed project would generate toxic air contaminant (TAC) emissions from diesel truck emissions. The California Air Pollution Control Officers Association (CAPCOA) has developed TAC health risk assessment guidelines to provide consistent, statewide procedures for preparing the health risk assessments required under the Air Toxics "Hot Spots" Act. The title of these guidelines is CAPCOA Air Toxics "Hot Spots" Program Revised 1992 Risk Assessment Guidelines. The District recommends that lead agencies conduct TAC risk assessments in accordance with the CAPCOA Risk Assessment Guidelines, as supplemented by the District's supplemental guidelines. According to CAPCOA guidelines, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of the standard risk-assessment methodology.

The SDAPCD TAC threshold of 10 in one million is defined as the "maximum incremental cancer risk" and is used as the threshold for said project. The nearest sensitive receptors to the project site are the existing mobile home park located approximately 50 feet to the west and the existing single-family detached residential dwelling units located approximately 0.18 miles (~290 meters) southwest and 0.19 miles (~305 meters) southeast of the project site.

As stated previously, the proposed project is developing the site with a 68,900 square foot industrial building, including 51,750 square feet of manufacturing/warehouse use and 17,150 square feet of office use. It is anticipated to have approximately 602 daily vehicle trips. The evaluation of the project analyzes the potential of three (3) dock doors proposed for loading; however, the associated emissions from those loading docks would not exceed thresholds. Furthermore, truck idling is limited to 5-minutes per Rule 2485.[5]

Finally, the most recent Health Risk Assessment for Proposed Land Use Projects prepared by CAPCOA (July 2009) recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). A

[5] https://www.sandiegocounty.gov/content/sdc/apcd/en/compliance-programs/mobile_sources.html#:~:text=Commercial%20Vehicle%20and%20School%20Bus%20Idling&text=are%20prohibited%20from%20idling%20for,%22Cerified%20Clean%20Idle%22%20sticker

summary of the basis for the distance recommendations can be found in the ARB Handbook Air Quality and Land Use Handbook: A Community Health Perspective.

The project is an unrefrigerated warehouse spec building and would not include TRUs. In addition, at only 51,750 square feet of industrial use, the project does not propose any activity with 100 trucks or greater per day. Therefore, a quantitative health risk assessment **would not be required** for the said project as emissions are far below thresholds. Significant TAC impacts from the project-related operational diesel particulate matter (DPM) sources are not anticipated. No significant long-term operations-related TAC impacts from the proposed project on nearby sensitive receptors would occur.

d) **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a "considerable" number of persons in the area would be considered to be a significant, adverse odor impact.

Construction

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature. The odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Diesel exhaust and VOCs would be emitted during the project's construction, which is objectionable to some; however, emissions would disperse rapidly from the project site and should not reach an objectionable level at the nearest sensitive receptors. Furthermore, construction emissions would not exceed SDAPCD thresholds. Due to the short-term nature and limited amounts of odor-producing materials being utilized, **no significant impact** related to odors would occur during the proposed project's construction.

Operational

Land uses and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. The proposed project is a 68,900 square foot unrefrigerated warehouse spec building. The anticipated uses for the proposed industrial use are not typically associated with objectionable odors. Therefore, **no significant impact** related to odors would occur during the ongoing operations of the proposed project.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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 state or federally protected wetlands (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 an 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 another approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Biological Resources
   - Figure 4.4-1 – MHCP and MSCP Areas
   - Figure 4.4-2 – Vegetation Classes
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Section 33-1068.A – Clearing of Land & Vegetation Protection
5. Multiple Habitat Conservation Program (MHCP), prepared by SANDAG in March 2003
6. Multiple Species Conservation Program (MSCP)
7. US Fish and Wildlife Service National Wetlands Mapper, accessed May 2, 2022
8. Biological Resources Technical Report for 2351 Meyers Avenue, Escondido, California, prepared by Dudek, July 2021 (Appendix 4)

Biological Resources Technical Report for 2351 Meyers Avenue, Escondido, California, prepared by Dudek, July 2021 (Appendix 4), has been used to prepare and is quoted throughout this Section.

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?**

Special-Status Plant Species

The entire site will be impacted, resulting in a net loss of 4.80 acres of wild oats grassland and 0.15 acres of ornamental plantings. The City requires mitigation for impacts to wild oats grassland at a 0.5:1 mitigation ratio. No mitigation is required for impacts on ornamental plantings. Mitigation credits were previously purchased in 2008 at Daley Ranch Mitigation Bank (2.21 acres of grassland and 0.06 acres of coastal sage scrub) for impacts to 4.80 acres of wild oats grassland. The coastal sage scrub credits are much higher value than non-native grassland and fulfill the remaining mitigation requirements. The purchase of mitigation credits was done in accordance with a previously approved industrial planned development on the project site (City Case No. 2005-24-PD and 2005-06-VRP) and adopted Mitigated Negative Declaration (City File No. ER 2005-16). The project never was constructed, and the project subsequently expired, but all required biological mitigation has been satisfied. Due to the previous purchase of mitigation credits and the current disturbed nature of the site, the project site has no value as habitat for endangered, rare, or threatened plant species. No special-status plants have moderate or high potential to occur on the project site due to a lack of suitable vegetation, soil, or microhabitats; or the project site is outside of their known range (Appendix B of the Biological Resources Technical Report (Appendix 4)); therefore, the project would result in a **less than significant impact** to special-status plants.

Special-Status Wildlife Species

The project site has no value as habitat for endangered, rare, or threatened wildlife species. No special-status wildlife species have moderate or high potential to occur on the project site due to a lack of suitable vegetation or microhabitats, or the project site is outside of their known range (Appendix C of the Biological Resources Technical Report (Appendix 4)); therefore, there are **no impacts** to special-status wildlife species.

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?**

There are no riparian habitats or other sensitive natural communities on-site; therefore, there are **no impacts** on these features.

c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

There are no jurisdictional waters or wetlands on-site; therefore, there are **no impacts** on these features.

d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The site is located within an urban area with development and/or developed streets on all sides. There are no wildlife corridors or habitat linkages on-site; therefore, there are **no impacts** on these resources.

Raptors and/or any migratory birds are protected under the Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) and the Fish and Game Code (3503 and 3503.5). The MBTA provides protection for birds by prohibiting the destruction of active nests for most native birds. The MBTA protects over 800 species of birds, including species such as house finch, mourning dove, and California towhee, which could nest in the grassland or ornamental plantings. These birds are not endangered, rare, or threatened species; as described above, the project has no value as a habitat for endangered, rare, or threatened species. The project will include a condition of approval as a compliance measure (**CM-1**) requiring nesting bird surveys to be completed if clearing and grubbing occur during the nesting season (typically February 15 through August 31). Local governments have the land use authority to protect bird nests during clearing and grubbing activities as a standard and typical permit condition for any property in the state and western region due to the wide range of the Pacific Flyway.

e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

There are no trees on the property to preserve. However, the City has an ordinance covering land and vegetation clearing. Section 33-1068.A regulates the removal of mature trees on private property and protects sensitive biological species and habitats. As noted in this section, there are no trees or sensitive biological species to protect on the property, so the project will have **no impact**.

f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan?**

The project will have **no impact** on the North County Multiple Habitat Conservation Plan (MHCP).

Mitigation: None

Compliance Measure:

CM-1: To avoid any direct impacts on raptors and/or any migratory birds protected under the Migratory Bird Treaty Act (16 USC 703 et seq.) and Fish and Game Code (3503 and 3503.5), removal of habitat shall occur outside of the nesting season for these species (i.e., outside of February 15 through August 31, annually). If habitat removal must occur during the nesting period, the project applicant or designee shall retain a biologist to conduct a pre-construction survey to determine the presence or absence of nesting birds in the area of disturbance. The pre-construction survey must be conducted within 72 hours prior to construction and shall be repeated if construction activities discontinue for more than three (3) consecutive days.

Impacts to active nests are typically avoided as follows. Clearing and construction shall be postponed or halted within the following buffers established by the biologist: (1) no work within 50 feet of a non-listed and non-raptor avifauna nest; and (2) no work within 500 feet of a raptor nest. Raptor nests are not anticipated due to a lack of suitable nesting habitat. The construction avoidance area shall be clearly demarcated in the field with highly visible construction fencing or flagging, and construction personnel shall be instructed on the sensitivity of nest areas. To the extent possible, the no-construction buffer zones shall be avoided until the nesting cycle is complete. However, it may be reasonable for the City to reduce these buffer widths depending on site conditions. If construction-related activities must take place within an active nest buffer area, the proposed project applicant or its designee shall present a plan to the City with measures to monitor and minimize impacts on nesting birds. No ground-disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active, and the young are not dependent on the nest.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	☐	☐	☒	☐
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Cultural and Paleontological Resources ➢ Figure 4.5-1 – Significant Historical Sites ➢ Figure 4.5-2 – Geological Formations				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones ➢ Article 40 – Historical Resources 4. Cultural Resources Study for 2351 Meyers Avenue Project (Tentative Parcel Map P18-00011), Escondido, California, prepared by Red Tail Environmental, December 2, 2020 (Appendix 5)				

Cultural Resources Study for 2351 Meyers Avenue Project (Tentative Parcel Map P18-00011), Escondido, California, prepared by Red Tail Environmental, December 2, 2020 (Appendix 5), has been used to prepare and is quoted throughout this Section.

a) **Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

A cultural resources study was prepared by Red Tail Environmental consisting of a review of all relevant site records and reports on file with the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University within a 1-mile search radius, a pedestrian survey of the project area by an archaeologist and Native American monitor, and a review of the Sacred Lands File held by the Native American Heritage Commission (NAHC). The report includes the study results, a brief historic background sketch for the area, and archaeological recommendations.

No archaeological resources were identified during the archaeological survey. The record search of the Sacred Lands File was negative. Twenty-nine cultural resources were identified within one mile of the project area. No resources were previously recorded within the project area. Due to the negative Sacred Lands File record search and the lack of resources within the project area, no further archaeological work is recommended (page 1, Appendix 5).

The study was negative for cultural resources. No archaeological resources were identified within the project area during the survey. Archival research performed at the SCIC indicated no previously recorded resources within the project area. Research of historic topographic maps and aerial imagery also indicated that the parcel had not been previously developed. Due to the lack of archaeological resources and indicators of intact subsurface deposits observed during the survey effort, the lack of previous development, and the negative Sacred Lands File search, no further archaeological work is recommended (page 16 (Appendix 5). Therefore, the project will have a **less than significant impact** on a historic or archaeological resource.

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

See response a) above.

c) **Disturb any human remains, including those interred outside of formally dedicated cemeteries?**

No cemeteries or human remains are known to occur on-site, and it is unlikely that human remains will be uncovered during project development. Pursuant to Public Resources Code §5097.98 and Health and Safety Code §7050.5, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the steps laid out in Public Resources Code §5097.98 and Health and Safety Code §7050.5 shall be followed. Following the requirements of Public Resources Code §5097.98 and Health and Safety Code §7050.5 will ensure that if human remains are discovered, they will be handled appropriately. Therefore, the project will have a **less than significant impact** on human remains.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones 4. Meyers Avenue Industrial Project – Air Quality, Greenhouse Gas (GHG), and Energy Impact Evaluation, City of Escondido, CA, prepared by MD Acoustics LLC, June 2, 2022 (Appendix 3)				

The Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3) that MD Acoustics, LLC prepared on June 2, 2022, has been used to prepare and is quoted throughout this Section.

a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?**

Construction Energy Demand

Construction Equipment Electricity Usage Estimates

Electrical service will be provided by San Diego Gas & Electric (SDG&E). Based on the 2017 National Construction Estimator, Richard Pray (2017)[6], the typical power cost per 1,000 square feet of building construction per month is estimated to be $2.32. The project proposes to develop the approximately 5-acre site with an approximately 68,900 square foot unrefrigerated warehouse spec building. Based on Table 16, the total power cost of the on-site electricity usage during the proposed project's construction is estimated to be approximately $1,918.18. As shown in Table 16, the total electricity usage from Project construction-related activities is estimated to be approximately 34,876 kWh.[7]

Table 16: Project Construction Power Cost and Electricity Usage

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot)[1]	Construction Duration (months)	Total Project Construction Power Cost
$2.32	68.900	12	$1,918.18

Cost per kWh	Total Project Construction Electricity Usage (kWh)
$0.06	34,876

*Assumes the project will be under the A-1 Small Commercial & Multi-Family Service rate under LADWP. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-financesandreports/a-fr-electricrates/a-fr-er-stcommindrates?_adf.ctrl-state=4uqberzct_4&_afrLoop=958662023680086

Construction Equipment Fuel Estimates

Using the CalEEMod data input, the project's construction phase would consume electricity and fossil fuels as a single energy demand. That is, once construction is completed, their use would cease. CARB's 2017 Emissions Factors Tables show that aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal.[8] As presented in Table 17 below, project construction activities would consume an estimated 31,435 gallons of diesel fuel.

6 Pray, Richard. 2017 National Construction Estimator. Carlsbad : Craftsman Book Company, 2017.

7 LADWP's Small Commercial & Multi-Family Service (A-1) is approximately $0.06 per kWh of electricity Southern California Edison (SCE). Rates & Pricing Choices: General Service/Industrial Rates. https://library.sce.com/content/dam/sce-doclib/public/regulatory/historical/electric/2020/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1_2020.pdf

8 Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines: (https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf).

Table 17: Construction Equipment Fuel Consumption Estimates								
Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Fac-tor	HP hrs/day	Total Fuel Consumption (gal diesel fuel)[1]
Grading	8	Excavators	1	8	158	0.38	480	208
	8	Graders	1	8	187	0.41	613	265
	8	Rubber Tired Dozers	1	8	247	0.4	790	342
	8	Tractors/Load-ers/Backhoes	3	8	97	0.37	861	372
Building Construction	230	Cranes	1	7	231	0.29	469	5,830
	230	Forklifts	3	8	89	0.2	427	5,311
	230	Generator Sets	1	8	84	0.74	497	6,182
	230	Tractors/Load-ers/Backhoes	3	7	97	0.37	754	9,370
	230	Welders	1	8	46	0.45	166	2,059
Paving	18	Cement and Mortar Mixers	4	6	9	0.56	121	118
	18	Pavers	1	8	130	0.42	437	425
	18	Paving Equipment	1	6	132	0.36	285	277
	18	Rollers	1	6	80	0.38	182	177
	18	Tractors/Load-ers/Backhoes	1	8	97	0.37	287	279
Architectural Coating	18	Air Compressors	1	6	78	0.48	225	219
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								**31,435**

Notes:
[1] Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp. (Source: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf)

Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light-duty autos (LDA) along area roadways. Concerning estimated VMT, the construction worker trips would generate an estimated 326,516 VMT. Construction workers' vehicle fuel efficiencies were estimated using information generated from CARB's EMFAC model (see Appendix C of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3) for details). Table 18 shows that an estimated 10,550 gallons of fuel would be consumed for construction worker trips.

Table 18: Construction Worker Fuel Consumption Estimates						
Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	8	15	14.7	1,764	30.95	57
Building Construction	230	93	14.7	314,433	30.95	10,159
Paving	18	20	14.7	5,292	30.95	171
Architectural Coating	18	19	14.7	5,027	30.95	162
Total Construction Worker Fuel Consumption						**10,550**

Notes:
[1] Assumption for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2020.4.0 defaults.

Construction Vendor/Hauling Fuel Estimates

Tables 19 and 20 show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. Concerning estimated VMT,

the vendor and hauling trips would generate an estimated 93,719 VMT. It is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light-duty vehicles for the architectural coatings.[9] Tables 19 and 20 show that an estimated 11,562 gallons of fuel would be consumed for vendor and hauling trips.

Table 19: Construction Vendor Fuel Consumption Estimates (MHD Trucks)[1]

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	8	0	6.9	0	9.22	0
Building Construction	230	37	6.9	58,719	9.22	6,369
Paving	18	0	6.9	0	9.22	0
Architectural Coating	18	0	6.9	0	9.22	0
Total Vendor Fuel Consumption						**6,369**

Notes:
[1] Assumption for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2020.4.0 defaults.

Table 20: Construction Hauling Fuel Consumption Estimates (HHD Trucks)[1]

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	8	218.8	20	35,000	6.74	5,193
Building Construction	230	0	20	0	6.74	0
Paving	18	0	20	0	6.74	0
Architectural Coating	18	0	20	0	6.74	0
Total Construction Hauling Fuel Consumption						**5,193**

Notes:
[1]Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod 2020.40 defaults.

Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately eighteen-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. In addition, the CARB Airborne Toxic Control Measure limits the idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Furthermore, the project has been designed in compliance with California's Energy Efficiency Standards and 2019 CALGreen Standards.

Construction of the industrial development would require the typical use of energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in the

[9] Vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 9.22 mpg for medium heavy-duty trucks and 6.74 mpg for heavy heavy-duty trucks (see Appendix C of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3) for details).

project's construction would therefore not result in inefficient, wasteful, or unnecessary fuel consumption and would be **less than significant**.

Operational Energy Demand

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Fuel Consumption

The largest source of operational energy use would be the vehicle operation of customers. The site is located in an urbanized area within the City of Escondido.

Using the VMT Analysis provided in the Transportation Assessment prepared for the proposed project (Linscott Law & Greenspan Engineers, 2021), it is assumed that the average vehicle miles traveled was 6.9 miles for all vehicle categories[10]. As the proposed project is a residential project, it was assumed that vehicles would operate 365 days per year. Table 21 shows the worst-case estimated annual fuel consumption for all classes of vehicles, from autos to heavy-heavy trucks, which would be an estimated 57,505 gallons for the operation of the proposed project.[11]

Table 21: Estimated Vehicle Operations Fuel Consumption

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles)[1]	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	346	6.9	2,387	31.82	75.00	27,375
Light Truck	Automobile	39	6.9	271	27.16	9.97	3,638
Light Truck	Automobile	113	6.9	781	25.6	30.49	11,130
Medium Truck	Automobile	75	6.9	521	20.81	25.02	9,131
Light Heavy Truck	2-Axle Truck	15	6.9	105	13.81	7.62	2,783
Light Heavy Truck 10,000 lbs +	2-Axle Truck	4	6.9	27	14.18	1.89	690
Medium Heavy Truck	3-Axle Truck	5	6.9	37	9.58	3.82	1,395
Heavy Heavy Truck	4-Axle Truck	4	6.9	27	7.14	3.73	1,363
Total		602	--	4,154	18.76	157.55	--
Total Annual Fuel Consumption							**57,505**

Notes:
[1]Based on the size of the site and relative location, trips were assumed to be local rather than regional.

Trip generation and VMT generated by the proposed project are consistent with other similar residential uses of similar scale and configuration, as reflected in the Transportation Assessment (Linscott Law & Greenspan Engineers, 2021). The proposed project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Therefore, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

[10] The trip distance of 7.44 miles was calculated by the use of the VMT Analysis provided in the Transportation Assessment Chatsworth Street Assisted Living prepared by Overland Traffic Consultants, Inc. May 2021.

[11] Average fuel economy based on aggregate mileage calculated in EMFAC 2017 for opening year (2023). See Appendix A for EMFAC output.

Facility Energy Demands (Electricity and Natural Gas)

The annual natural gas and electricity demands were provided per the CalEEMod output and are provided in Table 22.

Table 22: Project Mitigated Annual Operational Energy Demand Summary[1]	
Natural Gas Demand	**kBTU/year**
General Office Building	343,515
Unrefrigerated Warehouse	85,388
Total	428,903
Electricity Demand	**kWh/year**
General Office Building	221,921
Unrefrigerated Warehouse	23,660
Parking Lot	183,713
Total	429,294
Notes: [1]Taken from the CalEEMod 2020.4.0 annual output.	

As shown in Table 22, the estimated electricity demand for the proposed project is approximately 429,294 kWh per year. In 2020, the non-residential sector consumed approximately 11,658 kWh of electricity.[12] In addition, the estimated natural gas consumption for the proposed project is approximately 428,903 kBTU per year. In 2020, the non-residential sector of the County of San Diego consumed approximately 202 million therms of gas.[13] Therefore, the proposed project's electricity and natural gas demand increase are **less than significant** compared to the County's 2020 demand.

b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Access to/from the project site is from existing roads. These roads are already in place, so the project would not interfere with nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SANDAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant must comply with the California Green Building Standard Code requirements for energy-efficient buildings and appliances and utility energy efficiency programs implemented by SDG&E.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, use LED lighting, and install low pollutant-emitting finish materials.

[12] California Energy Commission, Electricity Consumption by County. https://ecdms.energy.ca.gov/elecbycounty.aspx
[13] California Energy Commission, Gas Consumption by County. http://ecdms.energy.ca.gov/gasbycounty.aspx

As shown in the Air Quality/Greenhouse Gas/ Energy Impact Study (Appendix 3) – Section 7.3 – Greenhouse Gas Plan Consistency, the project is also consistent with the reduction strategies of the City of Escondido Climate Action Plan (CAP).

Therefore, the project **will not** conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Geology and Soils
   - Figure 4.6-1 – Regional Faults
   - Figure 4.6-2 – Soil Types
   - Figure 4.6-3 – Liquefactions Hazard Areas

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				

- Figure 4.6-4 – Landslide Hazard Areas
- Figure 4.6-5 – Expansive Soils
- Volume I Final EIR – Cultural and Paleontological Resources

3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. California Department of Conservation EQ Zapp – California Earthquake Hazards Zone Application, accessed May 3, 2022
5. USGS Interactive Fault Map application, accessed May 3, 2022
6. Geotechnical Evaluation, Proposed Meyers Avenue Industrial Building Meyers Avenue South of Barham Drive, Assessor's Parcel Number (APN) 228-312-05-00, City of Escondido, County of San Diego, California, prepared by EEI Engineering Solutions, November 02, 2020 (Appendix 6)
7. Supplemental Geotechnical Report, New Industrial Building, 2351 Meyers Avenue, Escondido, California, Partner Project No. 21-345508.1, prepared by Partner, November 18, 2021 (Appendix 7)
8. Paleontological Resources Desktop Review: Orix-Sunrise Due Diligence Project, Prepared by Dudek, August 7, 2017 (Appendix 11)

The Geotechnical Evaluation (Appendix 6), prepared by EEI Engineering Solutions on November 2, 2020, and the Supplemental Geotechnical Report (Appendix 7), prepared by Partner on November 18, 2021, have been used to prepare and are quoted throughout this Section.

a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

As noted on page 5 of the Geotechnical Evaluation (Appendix 6), "*The subject property is located within an area of California known to contain a number of active and potentially active faults. There are no known active faults crossing the property (Jennings and Bryant, 2010) and the property is not within a State of California Earthquake Fault Zone (Hart and Bryant, 1997; CDMG, 2000). The closest known active fault is the Rose Canyon Fault Zone, located offshore approximately 13.2 miles west of the property (USGS, 2008). Therefore, the potential for surface rupture at the property is considered low. Three of the closest faults along with their distance from the property and Maximum Magnitude are shown in Table 2.*"

Table 2 Nearby Active Faults		
Fault	**Distance in Miles (Kilometers)[1]**	**Maximum Magnitude[1]**
Rose Canyon Fault	13.67 (22.0)	6.9
Newport Inglewood Connected Alt 1	13.67 (22.0)	7.5
Newport Inglewood Connected Alt 2	13.67 (22.0)	7.5

1. USGS Online Fault Search (2008)

Therefore, the project will have a **less than significant impact** on potential hazards associated with fault rupture directly, indirectly, and cumulatively.

ii) **Strong seismic ground shaking?**

Ground shaking hazards caused by earthquakes along active regional faults exists. The California Building Code requires use-modified spectral accelerations and velocities for most structural designs. Based on this analysis, compliance with an approved geotechnical report, the California Building Code, and the City of Escondido Municipal Code will ensure that risks associated with ground shaking are considered **less than significant,** directly, indirectly, and cumulatively.

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

Page 6 of the Geotechnical Evaluation (Appendix 6) states, "*Liquefaction occurs when loose, saturated, generally fine sands and silts are subjected to strong ground shaking. The soils lose shear strength and become liquid; potentially resulting in large total and differential ground surface settlements as well as possible lateral spreading during an earthquake. Seismically induced settlement can occur in response to liquefaction of saturated loose granular soils, as well as the reorientation of soil particles during strong shaking of loose, unsaturated sands. Due to the lack of shallow groundwater and the relatively dense granitic bedrock (tonalite) material at the subject property the potential for liquefaction and dynamic settlement to occur is considered very low.*"

Implementation of existing state and local laws and regulations concerning soil liquefaction and ground failure is required for all projects in the City. Therefore, **no impacts** related to liquefaction and ground failure will occur directly, indirectly, and cumulatively**.**

iv) **Landslides?**

Page 6 of the Geotechnical Evaluation (Appendix 6) states, "*The subject property and surrounding areas are slightly too moderately sloping. However, the property is underlain at shallow depths by hard/very dense granitic bedrock (tonalite) that is considered to be massive. As a result, we consider the potential for landslides or slope instabilities to occur at the property to be negligible.*"

All proposed retaining walls will be designed in compliance with an approved geotechnical report, the California Building Code, and the City of Escondido Municipal Code. Therefore, there will be **less than significant impacts** related to landslides**,** directly, indirectly, and cumulatively**.**

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

Project construction would be subject to local and state codes, erosion control, and grading requirements. Because construction activities would disturb one or more acres, the project must adhere to the NPDES Construction General Permit provisions. Construction activities subject to this permit include clearing, grading, and other soil disturbances, such as stockpiling and excavating. The NPDES Construction General Permit requires implementing a Storm Water Pollution Prevent Plan (SWPPP), including temporary project construction features (i.e., BMPs) designed to prevent erosion and protect the quality of stormwater runoff. Sediment-control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent.

In addition, grading activities would be required to conform to the most current version of the California Building Code, the City Code, the approved grading plans, and BMP's engineering practices. The project must also comply with San Diego Air Pollution Control District Rules 51 (Nuisance) and Rule 55 (Fugitive Dust), as noted under Section 2.1.2 in the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3). Compliance with these federal, regional, and local requirements would reduce the potential for on-site and off-site erosion effects to accepted levels during project construction.

Upon completion of construction activities, ground surfaces would be stabilized by project structures, paving, and landscaping. Therefore, impacts associated with soil erosion and the loss of topsoil would be **less than significant,** directly, indirectly, or cumulatively.

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?**

Landslides

A landslide is a movement of surface material down a slope. As noted in Section VII a) iv) above and in Figure 4.6-4 – Landslide Hazard Areas of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report, impacts related to landsliding and slope failure would be **less than significant,** directly, indirectly, or cumulatively through compliance with the Geotechnical Evaluation (Appendix 6) and the California Building Code.

Lateral Spreading

Lateral spread refers to landslides that commonly form on gentle slopes with rapid fluid-like flow movement, like water. As noted in Section VII a) iv) above, and as noted in Figure 4.6-4 – Landslide Hazard Areas of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report, impacts related to landsliding and slope failure would be **less than significant,** directly, indirectly, or cumulatively through compliance with the Geotechnical Evaluation (Appendix 6) and the California Building Code.

Subsidence

Subsidence is the sinking of the land surface. Evidence of subsidence includes ground cracking and damage to roadways, aqueducts, and structures. Subsidence caused by excessive groundwater pumping is a common occurrence in areas of California where groundwater is pumped for agricultural and municipal wells. Some shrinkage and subsidence are expected during the project grading activities as the pad is prepared for the project. Adherence to the recommendations of the Geotechnical Evaluation (Appendix 6) will ensure that the project site meets all City Code requirements, and the effect of subsidence will be **less than significant**, directly, indirectly, and cumulatively.

Liquefaction

Liquefaction is when strong earthquake shaking causes sediment layers saturated with groundwater to lose strength and behave as a fluid. This sub-surface process can lead to near-surface or surface ground failure resulting in property damage and structural failure. If surface ground failure does occur, it is usually expressed as lateral spreading, flow failures, ground oscillation, and/or general loss of bearing strength. Sand boils (injections of fluidized sediment) can commonly accompany these different types of failure.

As noted in Response VII a) iii) above, Figure 4.6-3 – Liquefaction Hazard Areas of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report indicates that the property is not within a liquefaction area and the project will have **no impact** related to liquefaction**.**

Collapsible Soils

Collapsible Soils are low-density, silty to very fine-grained, predominantly granular soils containing minute pores and voids. When saturated, these soils undergo a rearrangement of their grains and a loss of cementation, causing substantial, rapid settlement under even relatively light loads. A rise in the groundwater table or an increase in surface water infiltration, combined with the weight of a building or structure, can cause rapid settlement and consequent cracking of foundations and walls. Collapsible soils generally result from rapid deposition close to the source of the sediment where the materials have not been sufficiently moistened to form a compact soil.

Adherence to the recommendations of the Geotechnical Evaluation (Appendix 6) will ensure that the project site meets all City Code requirements, and the effect of project grading will be **less than significant**, directly, indirectly, and cumulatively.

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

Expansive soils contain certain clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semi-arid areas with seasonal soil moisture changes experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture.

Table 18-1 -B of the Uniform Building code read as follows:

TABLE 18-1-B – CLASSIFICATION OF EXPANSIVE SOILS	
EXPANSION INDEX	**POTENTIAL EXPANSION**
0 – 20	Very Low
21 – 50	Low
51 – 90	Medium
91 – 130	High
Above 130	Very High

Page 6 of the Geotechnical Evaluation (Appendix 6) states, "*Laboratory test results indicate the near surface onsite soils have a very low expansion potential. The expansion potential of these materials is not considered to pose a hazard for the proposed development.*"

By adhering to state and local seismic and structural regulations (i.e., California Seismic Hazards Mapping Act, California Building Code, and City of Escondido Municipal Code), the impacts of expansive soils will be **less than significant** directly, indirectly, or cumulatively.

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?**

Not applicable as the City of Escondido Sewer Service provides sewer to the project area, and the project must connect to the sewer. **No impact.**

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

The Paleontological Resources Desktop Review: Orix-Sunrise Due Diligence Project (Appendix 11), prepared by Dudek on August 7, has been used to prepare and is quoted throughout this Section.

The project site is relatively undeveloped and is underlain by Cretaceous age tonalite (Kt) and Mesozoic undifferentiated metasedimentary and metavolcanic bedrock (Mzu) according to published geological mapping (Kennedy et al., 2007; see attached Geology Map). A dirt access road extends south from Barham Drive through mapped metamorphic bedrock, and the two rectangular portions of the project area are underlain by igneous bedrock (Kennedy et al., 2007). According to the San Diego County Guidelines for Paleontology (2007), the Cretaceous age igneous bedrock underlying the majority of the project area has no potential (or no sensitivity), and the metamorphic bedrock mapped along the access road has marginal potential (or marginal sensitivity).

According to records searches conducted for nearby properties at the San Diego Natural History Museum (SDNHM), no paleontological localities are documented in this area (Siren, 2016). While it is unknown the full extent of the planned ground disturbance related to the project, based on the mapped geological units within the project area, a paleontological resources mitigation program is not recommended at this time. However, in the unlikely event that paleontological resources are encountered or impacted, a qualified paleontologist should be retained to evaluate any inadvertent discoveries.

Ground-disturbing activities have the potential to unearth previously unidentified paleontological resources. However, as identified above, the project site is underlain by igneous bedrock, which has no potential to yield paleontological resources. The project is not expected to directly or indirectly destroy a unique paleontological resource. The Geotechnical Evaluation (Appendix 6) did not identify any unique geologic features on the project site, and the project would have a **less than significant impact** on unique paleontological resources.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Greenhouse Gas Emissions
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Meyers Avenue Industrial Project – Air Quality, Greenhouse Gas (GHG), and Energy Impact Evaluation, City of Escondido, CA, prepared by MD Acoustics LLC, June 2, 2022 (Appendix 3)

The Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3) that MD Acoustics, LLC prepared on June 2, 2022, has been used to prepare and is quoted throughout this Section.

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

A GHG emissions screening threshold was developed as part of the City of Escondido Climate Action Plan (E-CAP) development review process.[14] Following the state's adopted AB 32 GHG reduction target, the E-CAP sets a goal to reduce its GHG emissions back to 1990 levels by the year 2020. This target was calculated as a 15-percent decrease from 2005 levels, as recommended in the AB 32 Scoping Plan.

The City of Escondido Greenhouse Gas Emissions Adopted CEQA Thresholds and Screening Tables document identifies a threshold level of 2,500 metric tons (MT) of carbon dioxide equivalents (CO2e) per year to identify individual land use development projects that may be required to quantify and mitigate project emissions.[15] Projects that would emit less than 2,500 MT CO2e per year are considered to have no impact.

As a land-use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the SANDAG's Regional Plan, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the state's long-term climate goals. This analysis also considers consistency with regulations and requirements adopted by the Scoping Plan and the City's CAP. Furthermore, the Governor's Office of Planning and Research (OPR) has noted that lead agencies should make a good-faith effort to calculate or estimate GHG emissions from a project.[16] Therefore, the GHG emissions have also been quantified below, consistent with OPR guidelines. As the Association of Environmental Professionals recommended in the 2016 Final White Paper, construction-related emissions are amortized over a 30-year period in conjunction with the proposed project's operational emissions (AEP 2016).

Construction Greenhouse Gas Emissions Impact

The greenhouse gas emissions from project construction equipment and worker vehicles are shown in Table 12. The emissions are from all phases of construction. Construction-related emissions are amortized over a 30-year period in conjunction with the proposed project's operational emissions, as the Association of Environmental Professionals (AEP 2016) recommended.

The total construction emissions amortized over a period of 30 years are estimated at 17.18 metric tons of CO_2e per year. Annual CalEEMod output calculations are provided in Appendix B of the Air Quality/Greenhouse Gas/Energy Impact study (Appendix 3).

[14] https://www.escondido.org/climate-action-plan-documents.aspx
[15] https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/CEQAThresholdsAndScreeningTables.pdf
[16] OPR Technical Advisory, page 5.

Table 12: Estimated Annual Construction Greenhouse Gas Emissions						
Year	Metric Tons Per Year					
	Bio-CO2	NBio-CO2	Total CO2	CH4	N20	CO2e (MT)
2022	0.00	132.30	132.30	0.02	0.01	136.02
2023	0.00	374.12	374.12	0.06	0.01	379.28
Total	0.00	522.15	522.15	0.09	0.02	531.20
					Annualized Construction Emissions	17.18

Notes:
1. $MTCO_2e$=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, and nitrous oxide).
2. The emissions are averaged over 30 years.
* CalEEMod output (Appendix B)

Operational Greenhouse Gas Emissions Impact

Operational emissions occur over the life of the project. Table 13 shows that the total for the proposed project's emissions (baseline emissions without credit for any reductions from sustainable design and/or regulatory requirements) would be 793.67 metric tons of CO_2e per year. Therefore, the proposed project's total annual GHG emissions resulting from construction and operational activities would not exceed the City's threshold of 2,500 MT CO2e per year. There would be a **less than significant impacts**.

Table 13: Opening Year Project-Related Greenhouse Gas Emissions						
Category	Greenhouse Gas Emissions (Metric Tons/Year)[1]					
	Bio-CO2	NonBio-CO_2	CO_2	CH_4	N_2O	CO_2e
Area Sources[2]	0.00	0.00	0.00	0.00	0.00	0.00
Energy Usage[3]	0.00	128.04	128.04	0.01	0.00	128.56
Mobile Sources[4]	0.00	533.51	533.51	0.04	0.02	541.83
Solid Waste[5]	13.11	0.00	13.11	0.77	0.00	32.48
Water[6]	4.76	52.97	57.73	0.49	0.01	73.61
Subtotal Emissions	17.87	714.52	732.40	1.31	0.04	**776.49**
					Amortized Construction Emissions	**17.18**
					Total Emissions	**793.67**
					City of Escondido Threshold	**2,500**
					Exceeds Threshold?	**No**

Notes:
[1] Source: CalEEMod Version 2020.4.0
[2] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
[3] Energy usage consists of GHG emissions from electricity and natural gas usage.
[4] Mobile sources consist of GHG emissions from vehicles.
[5] Solid waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[6] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[7] Construction GHG emissions based on a 30-year amortization rate.

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

The proposed project could have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted to reduce greenhouse gas emissions. The project's GHG impacts are evaluated by assessing the project's consistency with applicable statewide, regional, and local GHG reduction plans and strategies.

The Office of Planning and Research (OPR) encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City has adopted the City of Escondido

CAP, which encourages and requires applicable projects to implement energy efficiency measures. In addition, the California Climate Action Team (CAT) Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05. The 2008 Climate Change Scoping Plan provides measures to achieve AB 32 targets on a statewide level. On a regional level, the SANDAG's Regional Plan contains measures to achieve VMT reductions required under SB 375. Thus, if the project complies with these plans, policies, regulations, and requirements, the project would result in a less than significant impact because it would be consistent with the overarching state, regional, and local plans for GHG reduction.

A consistency analysis is provided below and describes the project's compliance with or exceedance of performance-based standards included in the regulations outlined in the applicable portions of the City of Escondido CAP, 2008 and 2017 Climate Change Scoping Plan, and SANDAG's Regional Plan.

City of Escondido CAP Consistency Analysis

As previously discussed, the E-CAP applies a screening threshold of 2,500 MT CO2e per year to comply with the reduction goals of AB 32. The proposed project's increase in GHG emissions would be less than the City's screening threshold and be consistent with the E-CAP. Implementation of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and would represent a **less than significant impact**.

Additionally, the City of Escondido CAP checklist has been completed showing the project will have no impact and is included in Appendix D of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3).

Consistency with SANDAG's San Diego Forward: The Regional Plan

Regarding consistency with SANDAG's Regional Plan, the proposed project would include site design elements and project design features developed to support the policy objectives of the RTP and SB 375.

Table 14 illustrates the proposed project's consistency with all applicable goals and policies of the Regional Plan (SANDAG 2015).

Table 14: Project Consistency with San Diego Forward: The Regional Plan[1]

Category	Policy Objective or Strategy	Consistency Analysis
The Regional Plan - Policy Objectives		
Mobility Choices	Provide safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play.	**Consistent**. The proposed project is to be located near bus stops and CA-78.
Mobility Choices	Take advantage of new technologies to make the transportation system more efficient and environmentally friendly.	**Not applicable.** The proposed project would not impair SANDAG's ability to employ new technologies to make travel more reliable and convenient.
Habitat and Open Space Preservation	Focus growth in areas that are already urbanized, allowing the region	**Consistent.** The proposed project is surrounded by existing residential

Table 14: Project Consistency with San Diego Forward: The Regional Plan[1]		
Category	**Policy Objective or Strategy**	**Consistency Analysis**
	to set aside and restore more open space in our less developed areas.	and commercial development and would be located close to major urban centers. Furthermore, the proposed project would also be a source of employment.
Habitat and Open Space Preservation	Protect and restore our region's urban canyons, coastlines, beaches, and water resources.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to protect and restore urban canyons, coastlines, beaches, and water resources. Furthermore, the proposed project is located in an already developed area.
Regional Economic Prosperity	Invest in transportation projects that provide access for all communities to a variety of jobs with competitive wages.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to invest in transportation projects available to all members of the Community.
Regional Economic Prosperity	Build infrastructure that makes the movement of freight in our community more efficient and environmentally friendly.	**Consistent**. The project proposes the development of the site with a warehouse building, and the site is located near CA-78.
Partnerships/Collaboration	Collaborate with Native American tribes, Mexico, military bases, neighboring counties, infrastructure providers, the private sector, and local communities to design a transportation system that connects to the mega-region and national network, works for everyone, and fosters a high quality of life for all.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to provide transportation choices to better connect the San Diego region with Mexico, neighboring counties, and tribal nations.
Partnerships/Collaboration	As we plan for our region, recognize the vital economic, environmental, cultural, and community linkages between the San Diego region and Baja California.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to provide transportation choices to connect the San Diego region with Mexico better.
Healthy and Complete Communities	Create great places for everyone to live, work, and play.	**Consistent.** According to the City of Escondido General Plan, the proposed project is an industrial project with a current land use designation of Light Industrial (LI). The proposed industrial project is located near bus stops and CA-78. Existing residential and commercial uses also surround the project site.
Healthy and Complete Communities	Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.	**Consistent.** The proposed project is to be located near bus stops and CA-78. Existing residential and commercial uses also surround the project site.
Environmental Stewardship	Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.	**Consistent.** The proposed project is to be located near bus stops and CA-78.
Environmental Stewardship	Support energy programs that promote sustainability.	**Consistent**. The proposed project would comply with the current building standards.
Sustainable Communities Strategy - Strategies		
Strategy Number 1	Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit.	**Consistent**. The proposed project would be close to major urban centers near bus stops and CA-78 and surrounded by existing commercial and residential development. Furthermore, the proposed project

Table 14: Project Consistency with San Diego Forward: The Regional Plan[1]		
Category	**Policy Objective or Strategy**	**Consistency Analysis**
		would also be a source of employment.
Strategy Number 2	Protect the environment and help ensure the success of smart growth land-use policies by preserving sensitive habitat, open space, cultural resources, and farmland.	**Consistent.** The proposed project would be close to major urban centers near bus stops and CA-78 and surrounded by existing commercial and residential development.
Strategy Number 3	Invest in a transportation network that gives people transportation choices and reduces greenhouse gas emissions.	**Consistent.** The proposed project is an industrial project located near bus stops and CA-78.
Strategy Number 4	Address the housing needs of all economic segments of the population.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to address the housing needs of all economic segments of the population.
Strategy Number 5	Implement the Regional Plan through incentives and collaboration.	**Not Applicable.** The proposed project would not impair the ability of SANDAG to implement the Regional Transportation Plan through incentives and collaborations.
Notes: MTS = San Diego Metropolitan Transit System; SANDAG = San Diego Association of Governments. [1] Source: SANDAG, 2015.		

As shown in Table 14, the proposed project is consistent with all applicable Regional Plan Policy Objectives or Strategies. Impacts would be **less than significan**t.

CARB Scoping Plan Consistency

The ARB Board approved a Climate Change Scoping Plan in December 2008. The Scoping Plan outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. The Scoping Plan "proposes a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (California Air Resources Board 2008). The measures in the Scoping Plan have been in place since 2012.

In November 2017, CARB released the 2017 Scoping Plan. This Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts, identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the State's 2030 GHG limit. In addition, Chapter 4 provides a broader description of the many actions and proposals being explored across the sectors, including the natural resources sector, to achieve the State's mid and long-term climate goals.

Guided by legislative direction, the actions identified in the 2017 Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low-carbon economy. The 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a

way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Plan includes policies requiring direct GHG reductions at some of the State's largest stationary and mobile sources. These policies include using lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources.

As the latest 2017 Scoping Plan builds upon previous versions, project consistency with applicable strategies of the 2008 and 2017 Plan is assessed in Table 15. As shown in Table 15, the project is consistent with the applicable strategies and would result in a **less than significant impact**.

Table 15: Project Consistency with CARB Scoping Plan Policies and Measures[1]

2008 Scoping Plan Measures to Reduce Greenhouse Gas Emissions	Project Compliance with Measure
California Light-Duty Vehicle Greenhouse Gas Standards – Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Energy Efficiency – Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The project will be compliant with the current Title 24 standards.
Low Carbon Fuel Standard – Develop and adopt the Low Carbon Fuel Standard.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Vehicle Efficiency Measures – Implement light-duty vehicle efficiency measures.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Medium/Heavy-Duty Vehicles – Adopt medium and heavy-duty vehicle efficiency measures.	**Consistent**. These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Green Building Strategy – Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes mandatory, voluntary standards in the 2019 edition of the Code on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The project will be subject to these mandatory standards.
High Global Warming Potential Gases – Adopt measures to reduce high global warming potential gases.	**Consistent.** CARB identified five measures that reduce HFC emissions from vehicular and commercial refrigeration systems; vehicles that access the project must comply with the standards and comply with the strategy.

Table 15: Project Consistency with CARB Scoping Plan Policies and Measures[1]	
2008 Scoping Plan Measures to Reduce Greenhouse Gas Emissions	**Project Compliance with Measure**
Recycling and Waste – Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The state is currently developing a regulation to reduce methane emissions from municipal solid waste landfills. The project will be required to comply with City programs, such as any City recycling and waste reduction programs, which comply with the 75 percent reduction required by 2020 per AB 341.
Water – Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The project will comply with all applicable City ordinances and CAL Green requirements.
2017 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	**Project Compliance with Recommended Action**
Implement Mobile Source Strategy: Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Car regulations.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Implement Mobile Source Strategy: At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025 and at least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Implement Mobile Source Strategy: Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Implement Mobile Source Strategy: Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	**Consistent.** These are CARB-enforced standards; vehicles that access the project must comply with the standards and comply with the strategy.
Implement SB 350 by 2030: Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Consistent.** The project will be compliant with the current Title 24 standards.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Consistent**. The project will be required to comply with City programs, such as any City recycling and waste reduction programs, which comply with the 75 percent reduction required by 2020 per AB 341.
Notes: [1] Source: CARB Scoping Plan (2008 and 2017)	

Therefore, the project will not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce greenhouse gas emissions. Impacts are considered to be **less than significant**.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Hazards and Hazardous Materials
   - Figure 4.8-1 – Existing Hazardous Materials Sites
   - Figure 4.8-2 – Wildfire Risk
   - Figure 4.8-4 – Emergency Evacuation Routes
   - Figure 4.8-5 – Land Uses within ¼ Mile of Schools
   - Figure 4.8-6 – Land Uses Near Airports
3. Chapter 7 – Local Emergency

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				

4. Chapter 33 Zoning
   - Article 26 – Industrial Zones
5. CalFire FHSZ Viewer, accessed May 29, 2022
6. Department of Toxic Substances Control EnviroStor database, accessed May 29, 2022
7. State Water Resources Control Board GeoTracker, accessed May 29, 2022
8. San Diego County Multi-Jurisdictional Hazard Mitigation Plan – City of Escondido
9. San Diego County Operational Area Emergency Plan (OAEP)
10. Phase I Environmental Site Assessment, 4.94-acre Undeveloped Property, Assessor's Parcel Number 228-312-05-00, 2351 Meyers Avenue, City of Escondido, San Diego County, California 92029, prepared by TA-Group DD, LLC, November 23, 2021 (Appendix 12)
11. Meyers Avenue Industrial Warehouse Project – Blasting Noise and Vibration Evaluation, prepared by MD Acoustics LLC, June 2, 2022 (Appendix 10)

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

The Blasting Noise and Vibration Evaluation (Appendix 10) that MD Acoustics, LLC prepared on March 31, 2022, has been used to prepare and is quoted throughout this Section.

Construction

Various hazardous substances and wastes would be transported, stored, used, and generated during construction. These would include fuels for machinery and vehicles, new and used motor oils, and storage containers and applicators containing such materials. Handling hazardous materials would be a temporary activity and coincide with the short-term construction phase of the project. Only the amounts of hazardous materials needed would be expected to be kept on-site, and handling such materials will be limited in both quantities and concentrations. Accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. Hazardous materials shall not be disposed of or released onto the ground, the underlying groundwater, or surface water. An enclosed containment shall be provided for all trash. All construction waste, including trash and litter, garbage, other solid debris, petroleum products, and other potentially hazardous materials, shall be removed to a waste facility permitted to treat, store, or dispose of such materials.

Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), San Diego County Air Pollution Control District (APCD), San Diego County Department of Environmental Health, and San Diego Regional Water Quality Control Board (RWQCB). With mandatory compliance with applicable hazardous materials regulations, the project would not create a

significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during construction.

Grading in the southwest corner of the project area will require cuts to the maximum depths of 21 feet. Geology on the site is listed as tonalite, a granite-like igneous rock. Surficial soils consist of the underlying rock's colluvial and residual weathering products and transition into weathered rock and bedrock. “Bedrock” is considered impractical to excavate if it cannot be ripped for mass grading effectively using a Caterpillar D-9 Dozer with a single shank ripper or equivalent. For trenching, it can be identified with a Caterpillar 375 Excavator equipped with a 24-inch bucket and rock teeth (page 1, Supplemental Geotechnical Report (Appendix 7)). It is expected that this project will not be able to excavate all of the bedrock without blasting.

Per the Blasting Noise and Vibration Evaluation (Appendix 10), the noise and vibration levels associated with blasting for this project would be within the Office of Surface Mining and Reclamation Enforcement’s (OSMRE’s) guidelines and the City of Escondido’s and San Marcos’ Municipal Codes with the implementation of mitigation measures **MM HAZ-1** through **MM HAZ-4**.

In addition, the implementation of the SWQMP, which contains construction BMPs for handling hazardous materials, such as requiring stockpiles and other sources of pollutants to be covered when there is a chance of rain, will reduce impacts on water quality hazards. With the implementation of applicable health and safety laws and the BMPs of the SWQMP, impacts related to hazardous materials during construction would be **less than significant with mitigation,** directly, indirectly, and cumulatively.

Operation

The buildings’ future occupant(s) is not yet identified. However, the project is designed to house a warehouse/distribution occupant, and hazardous materials could be transported and used during daily operations. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws are in place requiring businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the project site and handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require an Escondido Fire Department permit to register the business as a hazardous materials handler. Such businesses also are required to comply with California’s Hazardous Materials Release Response Plans and Inventory Law. This law requires immediate reporting to the Hazardous Materials Division of the County of San Diego’s Environmental Health and Quality Department and the State Office of Emergency Services regarding any release or threatened release of hazardous material, regardless of the amount handled by the business. The plan must include pre-emergency planning of emergency response procedures, notifications, coordination of affected government agencies and responsible parties, training, and follow-up.

In addition, any business handling at any one time greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of hazardous material. The HMBEP intends to satisfy federal and state Community Right-To-Know laws and provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the project, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above).

The closest existing sensitive receptors to the project are the mobile home park located approximately 50 feet to the west and the single-family residential uses located approximately 0.18 miles southwest and 0.19 miles southeast of the project site.

Any tenant will prepare and submit an acceptable Business Plan and Risk Management Prevention Program to the County Department of Environmental Health, as applicable, and obtain all other necessary licenses and permits.

In addition to the above, the proposed land use will also have the typical use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The project's operation would be required to comply with relevant federal, state, and local health and safety laws intended to minimize the health risk to the public associated with hazardous materials. Lastly, the project would implement the PDP SWQMP, which includes structural BMPs that ensure compliance with pollutant control requirements. With mandatory regulatory compliance, potentially hazardous materials impacts associated with the long-term operation of the project are determined to **be less than significant**, directly, indirectly, and cumulatively.

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?**

Construction

The transport, use, and handling of hazardous materials on the project site during construction will be handled according to all regulations to ensure the risk is **less than significant**, directly, indirectly, or cumulatively.

Operation

The project site would operate as a warehouse/distribution center upon buildout. Based on the operational characteristics of warehouse/distribution centers, hazardous materials could be used during a future occupant’s daily operations.

However, as discussed above under Section IX a), the project applicant must comply with all applicable local, state, and federal regulations concerning hazardous materials' transport, handling, and usage. Accordingly, impacts associated with the accidental release of hazardous materials would be **less than significant** during the long-term operation of the project, directly, indirectly, and cumulatively.

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

The closest school is Knob Hill Elementary School, located 0.62 miles or 3,284 feet northeast of the project site on the north side of Highway 78.

The project will require blasting during construction; however, no schools are within one-quarter mile of the site. The regular operation of the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a one-quarter mile of an existing or proposed school. Therefore, **no impacts** will occur directly, indirectly, or cumulatively on schools during construction or operation.

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?**

The Phase I Environmental Site Assessment (Appendix 12), prepared by TA Group DD, LLC on November 23, 2021, has been used to prepare and is quoted throughout this Section.

Reviewing the EnviroStor database and the State Water Resources Control Board, GeoTracker found the duplicate listings as noted in Phase 1 Environmental Site Assessment (Appendix 12).

However, no listings were found within the project area that would impact the project. The project would not create a significant hazard to the public or environment due to being a hazardous materials site. Therefore, there will be **no 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 a safety hazard or excessive noise for people residing or working in the project area?**

As noted on page 4.8-39 of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report (EIR), "*As shown in Figure 4.8-6 – Proposed Land Uses Near Airports, there is a heliport located at Palomar Medical Center which allows patients to be flown in or out of the hospital by helicopter. A second helipad is currently proposed, as shown in the figure, as part of the Palomar Medical Center West project within the ERTC North SPA. The operation of helipads is regulated by federal, state, and local laws intended to reduce risks of accidents associated with helicopters. In order to receive approvals from*

the FAA and Caltrans DOA, the existing and proposed helicopter flight paths are required to comply with standard obstruction-clearance criteria to ensure an obstruction-free volume of airspace for pilots using the facility. Compliance with all regulations would ensure that land uses proposed under the proposed project and within the vicinity of these helipads would not pose a risk to public health and safety from helicopter accidents and, therefore, impacts would be less than significant."

The project site is within the area of these helipads. No other airports are within two miles of the project site. However, as stated in the EIR, projects within the vicinity of these helipads would not pose a risk to public health and safety from helicopter accidents and, therefore, impacts would be **less than significan**t.

f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The project will have access off Meyers Avenue which is not one of the streets on Figure 4.8-4 – Emergency Evacuation Routes of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report. It is one of the existing streets within the City's established street system. The project will not alter the current circulation pattern in the project area. Therefore, emergency access and evacuation routes will be unaffected by the project.

Construction activities may temporarily restrict vehicular traffic. During blasting, it may be necessary to temporarily prevent vehicles from traveling on Meyers Avenue until it is safe. Temporary changes to the existing roadway network require the approval of the City of Escondido and notification to all emergency responders. Pursuant to **MM HAZ-5,** preparing a construction management plan to the specifications and approval of the City of Escondido will ensure temporary traffic impacts from construction will maintain adequate access for emergency vehicles and evacuation procedures during construction.

The project provides adequate emergency vehicle access, including street widths and vertical clearance on new streets. Implementing federal, state, and local laws and regulations in the project's construction will ensure a **less than significant impact with mitigation** on adopted emergency response or evacuation plans.

g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

See the responses under Section XX below for further information on wildfire impacts.

The project site is located in an urbanized area of the City. The site is not located in a Fire Hazard Severity Zone, as noted on the CalFire Fire Hazard Severity Zone Viewer. The project will include a new industrial building to be built to the latest Building and Fire Codes. The project will have **no impact** on exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Mitigation:

MM HAZ-1: The Permittee/Owner shall have a noise and vibration monitoring plan (NVMP) prepared by a qualified noise and vibration expert prior to grading permit issuance. The NVMP shall provide locations where monitoring would occur over the duration of the blasting and/or removal of rock debris. The plan will outline noise and vibration monitoring methodology, equipment, duration, notification process, reporting process, vibration limits, exceedance protocol, and complaint resolution process.

MM HAZ-2: The qualified noise and vibration expert shall monitor all blasting events. The blasting operator shall design the charge such that the overpressure noise level does not exceed 136 dB before mitigation or 130 dB when unmitigated, and the vibration level does not exceed 0.5 PPV in/sec at the nearest sensitive receptor. Blasts shall not occur closer than 50 feet from a sensitive receptor.

MM HAZ-3: Sound barriers shall be used if the unmitigated max charge weights are exceeded. The sound barriers shall be at least 8 feet tall and shall block any line of sight between the blasting area and adjacent buildings. The qualified noise and vibration expert shall ensure the sound barriers are appropriately installed.

MM HAZ-4: In locations where removal of rock is required when closer than 100 feet to an existing building, the project should use a nonexplosive option such as an excavator or nonexplosive agent for the removal of the large rock. The following links provide options for a nonexplosive agent. The blasting operator and the qualified noise and vibration expert shall determine the best option at the time of monitoring plan preparation (NVMP).

http://www.ecobust.com/

http://www.dexpan.com/dexpan-non-explosive-controlled-demolition-agent-silent-cracking-breaking.aspx

MM HAZ-5: Prior to finalizing plans and specifications, a construction management plan (CMP) shall be prepared for the City of Escondido's approval by the Permittee/Owner and/or their construction contractor for any construction activities encroaching into the public right-of-way. The CMP shall include measures designed to reduce the impact of temporary construction traffic and any necessary lane closures. In addition, all truck traffic shall use the City's truck routes. Such measures may include, but are not limited to, providing early notification of closures to the Escondido/San Marcos Fire Departments and Escondido/San Marcos Police Departments, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around lane closures; and flaggers to direct traffic in the vicinity of the closure.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Hydrology and Water Quality
   - Figure 4.9-1 – Watersheds
   - Figure 4.9-2 – Dam Inundation Areas
   - Figure 4.9-3 – Development in Flood Zones
3. Chapter 22 – Wastewater, Stormwaters, and Related Matters
4. Chapter 31 – Water
5. Chapter 33 Zoning
   - Article 26 – Industrial Zones
   - Article 55 – Grading and Erosion Control
6. City of Escondido Storm Water Design Manual
7. FEMA Flood Map Service Center: Search By Address website, accessed May 30, 2022
8. California Dam Breach Inundation Maps, Dam Breach Inundation Map Web Publisher – Accessed May 30, 2022
9. Preliminary Hydrology and Hydraulics Study, for Meyers Industrial PL20-0654, Meyers Avenue, Escondido, CA 92029. APN: 228-312-05-00, prepared by Pasco Laret Suiter & Associates, Inc., April 10, 2022 (Appendix 8)
10. City of Escondido Priority Development (PDP) SWQMP, Meyers Industrial Record ID (Permit) Numbers: PL20-0654, prepared by Pasco Laret Suiter & Associates, Inc., April 10, 2022 (Appendix 13)

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

See responses in Section XVX below for further information on water and wastewater.

National Pollutant Discharge Elimination System (NPDES)

The project site is in the Carlsbad Watershed, draining the Pacific Ocean. The City is a member permittee of the San Diego Regional Water Quality Control Board (RWQCB) MS4 Permit by Order No. R9-2013-0001 as amended by R9-2015-001 and R9-2015-0100.

The National Pollutant Discharge Elimination System (NPDES) program is administered by the Environmental Protection Agency (U.S. EPA), which provides oversight in California to the Regional Water Quality Control Boards. The CWA established the NPDES permit system to regulate discharges to surface waters of the U.S. from municipal and industrial sources. The NPDES permit is required to identify limits on allowable concentrations and mass emissions of pollutants contained in discharges.

The two basic types of NPDES permits issued are individual and general permits. An individual permit is a permit specifically tailored to an individual facility. Once a facility submits the appropriate application(s), the permitting authority develops a permit for that facility based on the information contained in the permit application (e.g., type of activity, nature of discharge, receiving water quality). The authority issues the permit to the facility for a specific time period (not to exceed five years) with a requirement that the facility reapplies prior to the expiration date.

The General Construction Permit requires that construction sites with 1.0 acre or greater soil disturbance or less than 1.0 acre, but part of a greater common plan of development, apply for coverage for discharges under the General Construction Permit. By submitting a Notice of Intent (NOI) for coverage, developing a Stormwater Pollution Prevention Plan (SWPPP), and implementing Best Management Practices (BMPs) to address construction site pollutants, the General Construction permit requirements are met. Since the project is greater than one acre, these requirements are in place. The applicant shall abide by all the provisions outlined in the SWRCB NPDES general permit for construction activities. The Permittee/Owner will prepare a Storm Water Pollution Prevention Plan (SWPPP) with a Notice of Intent prior to grading permit issuance in compliance with the requirements of the NPDES.

Water Quality Management Plan (WQMP)

The Priority Development (PDP) SWQMP (Appendix 13) prepared by Pasco Laret Suiter & Associates, Inc on April 10, 2022, has been used to prepare and is quoted throughout this Section.

A high point is located at the property's southwest corner in the existing condition. Stormwater from the undeveloped land located southwest of the subject property drains onto the subject property at the site's southwest corner. Runoff from the site sheet flows to the northeast toward Meyers Avenue. Stormwater is collected in the existing curb and gutter along the west side of Meyers Avenue. It flows north to an existing curb inlet located at the intersection of Meyers Avenue and E. Barham Drive. The existing City storm drain infrastructure drains north to an existing open channel that ultimately discharges to San Marcos Creek and then into Lake San Marcos.

A residential condominium project is proposed south and west of the existing site. As part of the residential condominium project, the proposed grading includes new access drives along the southern and western property boundaries. Existing off-site drainage will be intercepted by curb and gutters, and proposed storm drains within these access drives. All existing off-site drainage from the south is intercepted and conveyed to a 36” Reinforced Concrete Pipe (RCP) storm drain proposed in Meyers Avenue per Grading and Improvement Plan GP19-0016 and P19-0014. All existing off-site drainage from the west is intercepted and conveyed to a proposed storm drain in (Future) Sunrise View and Barham Drive per Improvement Plan IP20-00007 and P19-0014.

Drainage improvements will include curb inlets, catch basins, ribbon gutters, brow ditches, and storm drain pipes. An underground detention vault is proposed near the northeast corner to handle hydromodification requirements. Two (2) Modular Wetland Systems (MWS) are proposed upstream of the underground detention vault to provide stormwater treatment.

Hydrology

The Preliminary Hydrology and Hydraulic Study (Appendix 8), prepared by Pasco Laret Suiter & Associates, Inc on April 10, 2022, has been used to prepare and is quoted throughout this Section.

Drainage improvements will include curb inlets, catch basins, ribbon gutters, brow ditches, storm drain pipes, and an underground detention vault near the site's northeast corner. The proposed site will consist of one (1) major drainage basin with one (1) outfall to mimic existing conditions. The site grading and on-site storm drain system have been designed to avoid drainage diversion. Stormwater runoff from the project site is routed to POC-1 near the site's northeast corner, at a Type A cleanout and 18” storm drain lateral proposed per Improvement Plan P19-0014. The storm drain lateral connects to a proposed 36” RCP public storm drain pipe (per P19-0014) in Meyers Avenue, where flow travels north to the existing public storm drain system under Barham Drive.

Prior to discharging from the project site, developed site runoff is drained to one (1) proposed underground detention vault (BMP-1) for peak flow attenuation. The detention vault is also responsible for handling hydromodification requirements for the project site; however, the volume of the BMP is controlled by the 50-year peak flow detention requirement to meet the pre-development peak flow runoff rate. Two

(2) Modular Wetland Systems (MWS) are proposed upstream of the underground detention vault to provide stormwater treatment. Treatment of stormwater runoff from the site has been addressed in a separate report, "Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Meyers Industrial" (Appendix 13). Hydromodification (HMP) analysis has also been presented within the SWQMP.

The underground detention vault has been designed to provide flow control in the form of peak flow attenuation. The vault has been modified to include low-flow and mid-flow orifice outlets and an overflow weir to control peak flows. Overflow relief for the 50-year storm event is provided with a partition weir installed in the vault and discharged directly to the proposed Type A cleanout and proposed 18" storm drain lateral (per P19-0014). The storm drain lateral will discharge into the proposed 36" RCP storm drain pipe per P19-0014 located in Meyers Avenue.

Runoff from disturbed slopes along the northerly and easterly boundaries of the proposed development will drain to a proposed Type B brow ditch along the top of the proposed wall at the site's northeast corner. The brow ditch will discharge into the modified Type A cleanout (proposed per P16-0014) with a Type F opening at the site's northeast corner, where the flow will discharge into the existing 18" storm drain at POC-1.

The associated fill slopes and landscape areas along the northerly and easterly boundaries of the proposed development will drain directly off-site. For peak flow attenuation, these areas do not drain to the stormwater treatment BMPs or underground detention facility.

Conclusion

The project must comply with Article 55 – Grading and Erosion Control, Chapter 22 – Wastewaters, Stormwaters, and Related Matters of the City's Municipal Code, City of Escondido Storm Water Design Manual, and the MS4 permit. Therefore, the project will be designed to comply with existing federal, state, and local water quality laws and regulations pertaining to water quality standards, ensuring a **less than significant impact,** directly, indirectly, or cumulatively, on water quality and discharge.

b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

See responses in Section XVX below for further information on water.

Implementation of the project would not utilize groundwater for any purpose, such as for potable water or landscape irrigation. Rincon del Diablo Municipal Water District provides water service through an existing water infrastructure system. The project would not construct wells or propose other means of extracting groundwater. Therefore, the project would not deplete groundwater supplies.

The project will install water quality bio-filtration to expand and improve groundwater quality. Consequently, the project's development would not result in a net deficit in aquifer volume or a lowering of the groundwater table. The project will be designed to comply with existing federal, state, and local water quality laws and regulations related to groundwater. Therefore, the project will have a **less than significant impact** on groundwater supplies, directly, indirectly, or cumulatively.

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

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

Project construction would be subject to local and state codes, erosion control, and grading requirements. Because construction activities would disturb one or more acres, the project must adhere to the NPDES Construction General Permit provisions to prevent sediment from leaving the project site. Construction activities subject to this permit include clearing, grading, and other soil disturbances, such as stockpiling and excavating. The NPDES Construction General Permit requires implementing a Storm Water Pollution Prevent Plan (SWPPP), including temporary project construction features (i.e., BMPs) designed to prevent erosion and sediment, leaving the project site protecting the quality of stormwater runoff. Sediment-control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent.

Pursuant to NPDES regulations, the City will require that the project complies with existing San Diego RWQCB and City stormwater controls, including compliance with NPDES construction and operation measures to prevent erosion siltation and transport of urban pollutants. In addition, the City is a Co-Permittee and is required to comply with the MS4 Permit by Order No. R9-2013-0001 as amended by R9-2015-001 and R9-2015-0100. In conformance with the MS4 permit and the Water Quality Management Plan (WQMP), the project is required to implement structural and non-structural Best Management Practices (BMPs) to retain and treat pollutants of concern (in dry-weather runoff and first-flush stormwater runoff) and minimize hydrologic conditions of concern (HCOCs), both during and post-construction.

In addition, grading activities would be required to conform to the most current version of the California Building Code, the City Code, the approved grading plans, and good engineering practices. The project must also comply with SDAPCD Rule 51 (Nuisance) and Rule 55 (Fugitive Dust), as noted under the Air Quality Section 2.1.2 of the Air Quality/Greenhouse Gas/Energy Impact Study (Appendix 3), which would reduce construction erosion impacts. Compliance with these federal, regional, and local requirements would reduce the potential for on-site and off-site erosion effects to accepted levels during project construction.

Ground surfaces would be stabilized by project structures, paving, and landscaping for project operation upon completion of construction activities. Therefore, impacts associated with soil erosion and the loss of topsoil would be **less than significant**.

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

In addition to response Section X c) i) above, the City Engineer will review and approve the design and implementation of these facilities to assure compliance with all applicable local, state, and federal standards.

Implementation of the required NPDES and WQMP requirements discussed above and other applicable requirements will ensure that drainage and stormwater will not create or contribute water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the project will have a **less than significant impact**, directly, indirectly, or cumulatively, on the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

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

See Response Section X c) i) & ii above. Implementation of the required NPDES and WQMP requirements discussed above and other applicable requirements will ensure that runoff water will not exceed the capacity of existing or planned stormwater drainage systems. These regulations will also ensure the project will not provide additional sources of polluted runoff. Therefore, the project will have a **less than significant impact** directly, indirectly, and cumulatively.

iv) **Impede or redirect flood flows?**

The Preliminary Hydrology and Hydraulic Study (Appendix 8), prepared by Pasco Laret Suiter & Associates, Inc on April 10, 2022, has been used to prepare and is quoted throughout this Section.

Flood flows are being redirected. A high point is located at the property's southwest corner in the existing condition. Runoff from the site sheet flows to the northeast toward Meyers Avenue. Stormwater is collected in the existing curb and gutter along the west side of Meyers Avenue. It flows north to an existing curb inlet located at the intersection of Meyers Avenue and E. Barham Drive. The existing City storm drain infrastructure drains north to an existing open channel that ultimately discharges to San Marcos Creek and then into Lake San Marcos.

A residential condominium project has been approved by the City of San Marcos and the City of Escondido, and grading has commenced. As part of the residential condominium project, the proposed grading includes new access drives along the southern and western property boundaries. Existing off-site drainage will be intercepted by curb and gutters, and proposed storm drains within these access drives. All existing off-site drainage from the south is intercepted and conveyed to a 36" Reinforced Concrete Pipe (RCP) storm drain proposed in Meyers Avenue per Grading and Improvement Plan GP19-0016 and P19-0014. All existing off-site drainage from the west is intercepted and conveyed to a proposed storm drain in (Future) Sunrise View and Barham Drive per Improvement Plan IP20-00007 and P19-0014.

Drainage improvements will consist of curb inlets, catch basins, ribbon gutters, brow ditches, storm drain pipes, and an underground detention vault near the site's northeast corner. The proposed site will consist of one (1) major drainage basin with one (1) outfall to mimic existing conditions. The site grading and on-site storm drain system have been designed to avoid drainage diversion. Stormwater runoff from the project site is routed to POC-1 near the site's northeast corner, at a Type A cleanout and 18" storm drain lateral proposed per Improvement Plan P19-0014. The storm drain lateral connects to a proposed 36" RCP public storm drain pipe (per P19-0014) in Meyers Avenue, where flow travels north to the existing public storm drain system under Barham Drive.

Prior to discharging from the project site, developed site runoff is drained to one (1) proposed underground detention vault (BMP-1) for peak flow attenuation. The detention vault is also responsible for handling hydromodification requirements for the project site; however, the volume of the BMP is controlled by the 50-year peak flow detention requirement to meet the pre-development peak flow runoff rate. Two (2) Modular Wetland Systems (MWS) are proposed upstream of the underground detention vault to provide stormwater treatment. Treatment of stormwater runoff from the site has been addressed in a separate report, "Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Meyers Industrial" (Appendix 13). Hydromodification (HMP) analysis has also been presented within the SWQMP.

The underground detention vault has been designed to provide flow control in the form of peak flow attenuation. The vault has been modified to include low-flow and mid-flow orifice outlets and an overflow weir to control peak flows. Overflow relief for the 50-year storm event is provided with a partition weir installed in the vault and discharged directly to the proposed Type A cleanout and proposed 18" storm drain lateral (per P19-0014). The storm drain lateral will discharge into the proposed 36" RCP storm drain pipe per P19-0014 located in Meyers Avenue.

Runoff from disturbed slopes along the northerly and easterly boundaries of the proposed development will drain to a proposed Type B brow ditch along the top of the proposed wall at the site's northeast corner. The brow

ditch will discharge into the modified Type A cleanout (proposed per P16-0014) with a Type F opening at the site's northeast corner, where the flow will discharge into the existing 18" storm drain at POC-1.

The associated fill slopes and landscape areas along the northerly and easterly boundaries of the proposed development will drain directly off-site. For peak flow attenuation, these areas do not drain to the stormwater treatment BMPs or underground detention facility.

As described throughout this Response X), the project will be required to comply with all applicable water quality standards. The project re-direction of on-site stormwater will be **less than significant**, directly, indirectly cumulatively.

d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

Seiche is a temporary disturbance or oscillation in the water level of a lake or partially enclosed body of water, especially one caused by changes in atmospheric pressure.

A tsunami is a long high sea wave caused by an earthquake, submarine landslide, or other disturbance.

As noted in the Geotechnical evaluation (Appendix 6), the subject property is not located immediately adjacent to any lakes or confined bodies of water; therefore, the potential for a seiche to affect the site is considered low. The subject property is not located within a Tsunami Evacuation Area. Therefore, damage due to tsunamis is considered low.

The project site is located within a minimal flood hazard zone (Zone X) as mapped by FEMA (FEMA Flood Insurance Rate Map No. 06073C0794G). Figures 4.9-2 – Dam Inundation Areas and 4.9-3 – Development of Flood Zones of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report indicate that the subject site is not located near any sources of potential flood impacts.

The project location as well as compliance with existing federal, state, and local flood hazard laws and regulations pertaining to the project's design will ensure **no impact** on flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation, directly, indirectly, or cumulatively.

e) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

As described throughout this Section and Section X of this review, the project is required to comply with Article 55 – Grading and Erosion Control, Chapter 22 – Wastewaters, Stormwaters, and Related Matters of the City's Municipal Code, City of Escondido Storm Water Design Manual, and the MS4 permit. Therefore, the

project will be designed to comply with existing federal, state, and local water quality laws and regulations pertaining to water quality standards, ensuring a **less than significant impact**, directly, indirectly, or cumulatively, on the water quality control and groundwater management plan.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Land Use 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones				

a) **Physically divide an established community?**

The project is the development of the last vacant light industrial property in this area. To the north, the property is bounded by a self-storage facility with recreational vehicle (RV) storage, Barham Drive, and State Route 78 (SR-78) beyond. To the south, the subject property is bounded by light industrial development. Meyers Avenue bounds the subject property to the east, with light industrial and some commercial development beyond. The subject property is bounded by a new residential community (under construction) and a mobile home park to the west.

The project will not divide an existing community but rather will expand an existing community as planned by the General Plan. Therefore, **no impact** either directly, indirectly, or cumulatively will occur on an established community.

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

The project is consistent with the applicable general plan designation, policies, zoning designation, and regulations. The City's General Plan land-use designation for the project site is Light Industrial (LI), with an underlying zoning designation of M-1 – Light Industrial and P-D – Planned Development.

The General Plan Light Industrial (LI) designation and the M-1 – Light Industrial and P-D – Planned Development Zones are intended for light manufacturing,

warehouse, distribution, assembly, and wholesale uses in a more restrictive setting than the General Industrial designation. Lighter industrial and office type uses are intended and industries that generate moderate daytime and minimum nighttime noise levels and require limited or no outside storage. Uses that provide supporting products or services for the primary businesses are also allowed. M-1 development standards are more restrictive than the General Industrial (M-2) Zone to ensure compatibility among various uses.

The project helps implement General Plan Goal 10 and has been designed to meet the appropriate associated policies.

GOAL10: A variety of industrial uses located and designed to assure compatibility with adjoining land uses offering diverse jobs for the community.

Industrial Land Use Policy 10.1
Establish Industrial Office, Light Industrial, and General Industrial land use designations as described in Figure II-6 to accommodate the need for the various types of industrial uses.

Industrial Land Use Policy 10.2
Encourage the development of industrial buildings in planned, group concentrations and incorporate features that minimize impacts on adjacent sensitive uses associated with noise, property maintenance, product deliveries, trash service and other potentially incompatible issues.

Industrial Land Use Policy 10.3
Require that projects located within the Industrial Office classification be designed to be aesthetically attractive and compatible with adjoining land uses addressing such elements as land use, building architecture, landscaping, screening of outside storage, and outbuilding uses. Scale the amount of required improvements to the size of the project for businesses expanding their operations.

Industrial Land Use Policy 10.4
Encourage the development of “Safety Uses” (e.g., police station, fire department, city related uses etc.), support commercial, and industrial-related office uses (e.g., architects, data processing, engineering, contractor, government services, corporate headquarters) in the Industrial Office land use designation as an incentive to transition from M2 and M1 zones to the IO zone.

Industrial Land Use Policy 10.5
Accommodate industries that generate moderate daytime and minimum nighttime noise levels and require limited or no outside storage in Light Industrial designated properties.

Industrial Land Use Policy 10.6
Require development on properties located in designated Light Industrial areas to incorporate stricter standards than comparable General Industrial designated sites for building architecture, landscaping, and screening of outside storage, property setbacks, and open land use.

Industrial Land Use Policy 10.7
Correlate the scale and amount of required improvements with the size of the project for businesses expanding their operations.

Industrial Land Use Policy 10.8
Maintain building intensity standards for Industrial designated properties as required by law.

Industrial Land Use Policy 10.9
Allow more flexible requirements affecting building architecture, landscaping, screening of outside storage, or outbuilding use depending on location and visibility from off-site areas on properties designated General Industrial. Scale the amount of required improvements to the size of the project for businesses expanding their operations.

In summary, the project is consistent with the City's General Plan. The City's General Plan is the basis for the City's portion of the Southern California Association of Governments (SCAG) 2016 -2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the project is also consistent with the RTP/SCS. Therefore, a **less than significant impact** will occur directly, indirectly, or cumulatively on causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Mineral Resources ➢ Figure 4.11-1 – Existing and Past Extraction Facilities 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones 4. California Department of Conservation California Geologic Survey CGS Information Warehouse: Mineral Land Classification, accessed May 30, 2022				

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?**

The project site is in an urban setting and unsuitable for mineral resource land uses. The project will have **no impact,** directly, indirectly, or cumulatively on mineral resources.

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?**

Response XII) a) above noted that the project site is not delineated on a local general plan, specific plan, or other land-use plans for mineral resources. Therefore, the project will have **no impact**, directly, indirectly, or cumulatively on the availability of important mineral resources.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Noise
   - Figure 4.12-1 – Existing Noise Contours
   - Figure 4.12-2 – Future (2035) Noise Contours
   - Figure 4.12-3 – Significantly Impacted Roadway Segments
3. Article 12 – Noise Abatement and Control
   - Section 17-234 – Construction Equipment
   - Section 17-237 – Landscape Equipment
   - Section 17-238 – Grading
4. Chapter 33 Zoning
   - Article 26 – Industrial Zones
5. Meyers Industrial Facility Noise Impact Study City of Escondido, CA, prepared by MD Acoustics LLC, August 5, 2022 (Appendix 9)

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project:				
6. Meyers Avenue Industrial Warehouse Project – Blasting Noise and Vibration Evaluation, prepared by MD Acoustics LLC, June 2, 2022 (Appendix 10)				

The Noise Impact Study (Appendix 9), prepared on August 5, 2022, and the Blasting Noise and Vibration Evaluation (Appendix 10), prepared on June 2, 2022, by MD Acoustics, LLC, have been used to prepare and are quoted throughout this Section.

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

Study Method and Procedure

The following section describes the noise modeling procedures and assumptions used for this assessment.

Noise Measurement Procedure and Criteria

Noise measurements are taken to determine the existing noise levels. A noise receiver or receptor is any location in the noise analysis in which noise might produce an impact. The following criteria are used to select measurement locations and receptors:

- Locations expected to receive the highest noise impacts, such as the first row of houses
- Locations that are acoustically representative and equivalent to the area of concern
- Human land usage
- Sites clear of major obstruction and contamination

MD conducted the sound level measurements according to Federal Highway Transportation (FHWA) and Caltrans (TeNS) technical noise specifications. All measurement equipment meets American National Standards Institute (ANSI) specifications for sound level meters (S1.4-1983 identified in Chapter 19.68.020.AA). The following gives a brief description of the Caltrans Technical Noise Supplement procedures for sound level measurements:

- Microphones for sound level meters were placed 5 feet above the ground for all measurements
- Sound level meters were calibrated (Larson Davis CAL 200) before and after each measurement
- Following the calibration of equipment, a windscreen was placed over the microphone

- Frequency weighting was set on “A” and slow response
- Results of the long-term noise measurements were recorded on field data sheets
- During any short-term noise measurements, any noise contaminations such as barking dogs, local traffic, lawn mowers, or aircraft flyovers were noted
- Temperature and sky conditions were observed and documented

Noise Measurement Locations

Noise monitoring locations were selected based on the nearest sensitive receptors relative to the proposed onsite noise sources. One (1) long-term 24-hour noise measurement was conducted at or near the project site and is illustrated in Exhibit E. Appendix A of the Noise Impact Study (Appendix 9) includes photos, a field sheet, and measured noise data.

Stationary Noise Modeling

SoundPLAN (SP) acoustical modeling software was utilized to model future worst-case stationary noise impacts on the adjacent land uses. SP can evaluate multiple stationary noise source impacts at various receiver locations. SP’s software utilizes algorithms (based on the inverse square law and reference equipment noise level data) to calculate noise level projections. The software allows the user to input specific noise sources, spectral content, sound barriers, building placement, topography, and sensitive receptor locations.

The future worst-case noise level projections were modeled using referenced sound level data for the various stationary on-site sources (parking spaces, truck loading dock with an idling semi-truck). The model assumes approximately 151 parking spots and three (3) truck loading docks, a proposed six (6) foot sound wall, and an existing eight (8) foot CMU wall at the west property line.

The loading dock was calibrated with a reference level of 74 dBA at 10 feet. The reference sound level data is provided in Appendix B of the Noise Impact Study (Appendix 9).

The SP model assumes that all noise sources are operating simultaneously (worst-case scenario) when in actuality, the noise will be intermittent and lower in noise level. SP modeling inputs and outputs are provided in Appendix C of the Noise Impact Study (Appendix 9).

FHWA Traffic Noise Prediction Model

Traffic noise from vehicular traffic was projected using a computer program replicating the FHWA Traffic Noise Prediction Model (FHWA-RD-77-108). The FHWA model arrives at the predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). Roadway volumes and percentages correspond to the project's Average Daily Trips (ADT) provided by Linscott, Law & Greenspan, Engineers, the City's traffic counts, and roadway classification. The referenced traffic data was applied to the model and is in Appendix B of the Noise Impact Study (Appendix 9). The following outlines the key adjustments made to the REMEL for the roadway inputs:

- Roadway classification – (e.g., freeway, major arterial, arterial, secondary, collector, etc.),
- Roadway Active Width – (distance between the center of the outermost travel lanes on each side of the roadway)
- Average Daily Traffic Volumes (ADT), Travel Speeds, Percentages of automobiles, medium trucks, and heavy trucks
- Roadway grade and angle of view
- Site Conditions (e.g., soft vs. hard)
- Percentage of total ADT which flows each hour throughout a 24-hour period

Table 2 indicates the roadway parameters and vehicle distribution utilized for this study.

Table 2: Roadway Parameters and Vehicle Distribution

Roadway	Segment	Existing ADT	Existing Plus Project ADT	Speed (MPH)	Site Conditions
Mission Road	Barham Dr to Nordahl Rd	20,600	21,269	45	Soft
Vehicle Distribution (Truck Mix)[1]					

Table 2: Roadway Parameters and Vehicle Distribution					
Roadway	**Segment**	**Existing ADT**	**Existing Plus Project ADT**	**Speed (MPH)**	**Site Conditions**
Motor-Vehicle Type		**Daytime % (7 AM to 7 PM)**	**Evening % (7 PM to 10 PM)**	**Night % (10 PM to 7 AM)**	**Total % of Traffic Flow**
Automobiles		75.5	14.0	10.5	97.42
Medium Trucks		48.9	2.2	48.9	1.84
Heavy Trucks		47.3	5.4	47.3	0.74
Notes: [1] Traffic counts provided by SANDAG City of Escondido Appendix D of the Noise Impact Study (Appendix 9).					

The following outlines key adjustments to the REMEL for project site parameter inputs:

- Vertical and horizontal distances (Sensitive receptor distance from noise source)
- Noise barrier vertical and horizontal distances (Noise barrier distance from sound source and receptor).
- Traffic noise source spectra
- Topography

FHWA Roadway Construction Noise Model

The construction noise analysis utilizes the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RNCM) and several key construction parameters. Key inputs include distance to the sensitive receiver, equipment usage, percentage usage factor, and baseline parameters for the project site.

The project was analyzed based on the different construction phases. Construction noise is expected to be loudest during the grading, concrete, and building phases. The construction noise calculation output worksheet is in Appendix E of the Noise Impact Study (Appendix 9). The following assumption relevant to short-term construction noise impacts were used:

- It is estimated that construction will occur over a 6 to 8-month time period. Construction noise is expected to be the loudest during the grading, concrete, and building phases.

Existing Noise Environment

One (1) 24-hour ambient noise measurement was conducted at the project site. Noise measurements were taken to determine the existing ambient noise levels. Noise data indicates that traffic along Meyers Avenue and surrounding businesses is the primary noise source impacting the site and the surrounding area.

Long-Term Noise Measurement Results

The results of the long-term noise data are presented in Table 3.

Date	Time	dB(A)							
		L_{EQ}	L_{MAX}	L_{MIN}	L_2	L_8	L_{25}	L_{50}	L_{90}
11/11/2020	8AM-9AM	50.0	60.7	44.6	55.4	52.6	51.7	49.3	47.2
11/11/2020	9AM-10AM	49.0	59.7	43.6	54.4	51.6	50.7	48.3	46.2
11/11/2020	10AM-11AM	48.9	59.6	43.5	54.3	51.5	50.6	48.2	46.1
11/11/2020	11AM-12PM	49.1	59.8	43.7	54.5	51.7	50.8	48.4	46.3
11/11/2020	12PM-1PM	49.2	59.9	43.8	54.6	51.8	50.9	48.5	46.4
11/11/2020	1PM-2PM	49.3	60.0	43.9	54.7	51.9	51.0	48.6	46.5
11/11/2020	2PM-3PM	49.5	60.2	44.1	54.9	52.1	51.2	48.8	46.7
11/11/2020	3PM-4PM	50.7	61.4	45.3	56.1	53.3	52.4	50.0	47.9
11/11/2020	4PM-5PM	52.2	62.9	46.8	57.6	54.8	53.9	51.5	49.4
11/11/2020	5PM-6PM	51.9	62.6	46.5	57.3	54.5	53.6	51.2	49.1
11/11/2020	6PM-7PM	50.1	60.8	44.7	55.5	52.7	51.8	49.4	47.3
11/11/2020	7PM-8PM	48.8	59.5	43.4	54.2	51.4	50.5	48.1	46.0
11/11/2020	8PM-9PM	47.7	58.4	42.3	53.1	50.3	49.4	47.0	44.9
11/11/2020	9PM-10PM	47.0	57.7	41.6	52.4	49.6	48.7	46.3	44.2
11/11/2020	10PM-11PM	46.0	56.7	40.6	51.4	48.6	47.7	45.3	43.2
11/11/2020	11PM-12AM	45.4	56.1	40.0	50.8	48.0	47.1	44.7	42.6
11/12/2020	12AM-1AM	43.8	54.5	38.4	49.2	46.4	45.5	43.1	41.0
11/12/2020	1AM-2AM	41.4	52.1	36.0	46.8	44.0	43.1	40.7	38.6
11/12/2020	2AM-3AM	40.1	50.8	34.7	45.5	42.7	41.8	39.4	37.3
11/12/2020	3AM-4AM	38.4	49.1	33.0	43.8	41.0	40.1	37.7	35.6
11/12/2020	4AM-5AM	39.4	50.1	34.0	44.8	42.0	41.1	38.7	36.6
11/12/2020	5AM-6AM	43.2	53.9	37.8	48.6	45.8	44.9	42.5	40.4
11/12/2020	6AM-7AM	49.6	60.3	44.2	55.0	52.2	51.3	48.9	46.8
11/12/2020	7AM-8AM	51.9	62.6	46.5	57.3	54.5	53.6	51.2	49.1
CNEL		**52.6**							

Notes:
[1.] Long-term noise monitoring location (LT1) is illustrated in Exhibit E. The quietest hourly daytime noise interval is highlighted in Orange when project operations could occur.

Noise data indicates that the quietest daytime ambient noise level measured 47 dBA at the project site. Additional field notes and photographs are provided in Appendix A of the Noise Impact Study (Appendix 9).

For this evaluation, MD has utilized the measured Leq and has compared the project's projected noise levels to this level.

Future Noise Environment Impacts

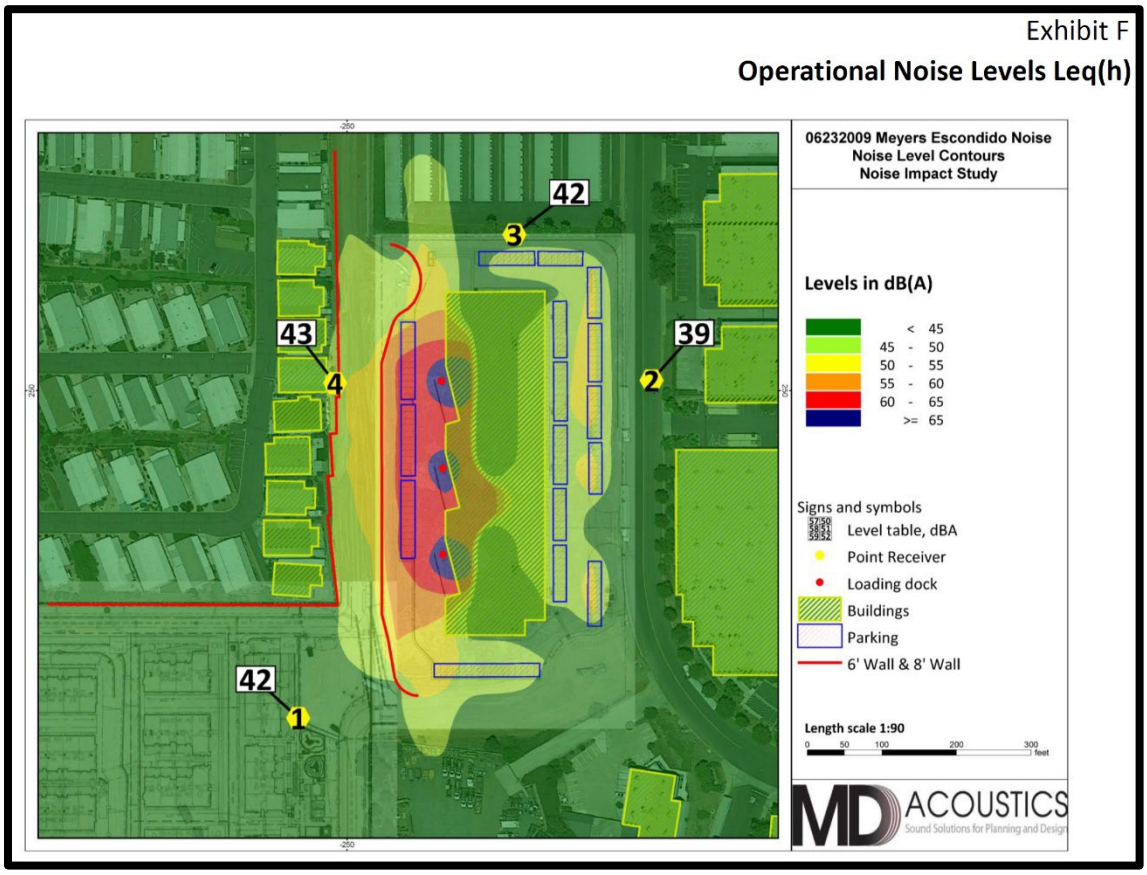
This assessment analyzes future noise impacts as a result of the project. The analysis details the estimated exterior noise levels. Stationary noise impacts are analyzed from the on-site noise sources such as parking and on-site operations.

Future Exterior Noise

The following analysis outlines the exterior noise levels associated with the proposed project.

Noise Impacts on Off-Site Receptors Due to Stationary Sources

Sensitive receptors that may be affected by project operational noise include residential uses to the west. The worst-case stationary noise was modeled using SoundPLAN acoustical modeling software. For this study, project activities are assumed always operational when the noise will be intermittent in reality. As a worst-case scenario, the project evaluates the loading dock noise for three (3) docks. Exhibit F provides the site plan with the three (3) loading docks.



A total of three (3) receptors were modeled to evaluate the proposed project's operational impact. A yellow dot denotes a receptor. All yellow dots represent either a property line or a sensitive receptor, such as a sensitive outdoor area (courtyard, patio, backyard, etc.).

This study compares the project's operational noise levels to two (2) different noise assessment scenarios: 1) Project Only operational noise level projections, and 2) Project plus ambient noise level projections.

Project Operational Noise Levels

Exhibit F shows the "project only" operational noise levels at the site and illustrates how the noise will propagate at the property lines and/or sensitive receptor area. Operational noise levels at the adjacent uses are anticipated to range between 39 dBA to 43 dBA Leq (depending on the location).

Project Plus Ambient Operational Noise Levels

Table 4 demonstrates the project plus the ambient noise levels. Project plus ambient noise level projections are anticipated measure 48 dBA Leq depending on location.

Table 4: Worst-case Predicted Operational Leq

Receptor[1]	Floor	Existing Ambient Noise Level (dBA, Leq)[2]	Project Noise Level (dBA, Leq)[3]	Total Combined Noise Level (dBA, Leq)	Nighttime (10 PM – 7 AM) Stationary Noise Limit (dBA, Leq)[4]	Change in Noise Level as Result of Project
1	1	47	42	48	**50**	1
2	1		39	48	**50**	1
3	1		42	48	**50**	1
4	1		43	50	**60**	1

Notes:
1. Receptors 2 – 3 represent commercial. Receptors 1 and 4 represent multi-family residential.
2. Existing ambient taken as a one-hour measurement.
3. See Exhibit F for the operational noise level projections at said receptors.
4. Sec 17-29 of the Escondido Municipal Code is used as it is the most restrictive noise ordinance.

As shown in Table 4, the project will increase the worst-case noise level by approximately 1 dBA Leq, depending on location. It takes a change of 3 dBA to hear a noticeable difference.

Table 5 provides the characteristics associated with changes in noise levels.

Table 5: Change in Noise Level Characteristics[1]

Changes in Intensity Level, dBA	Changes in Apparent Loudness
1	Not perceptible
3	Just perceptible
5	Clearly noticeable
10	Twice (or half) as loud

https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm

The change in noise level would fall within the “Not Perceptible” to “Just Perceptible” acoustic characteristic depending on location and only in a worst-case scenario with three semi-trucks idling simultaneously. Therefore, the change in noise level would be **less than significant** at the adjacent uses.

Noise Impacts to On/Off-Site Receptors Due to Project Generated Traffic

A worst-case project-generated traffic noise level was modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108. Traffic noise levels were calculated 50 feet from the centerline of the analyzed roadway. The modeling is theoretical and does not consider any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference with and without project conditions. In addition, the noise contours for 60, 65, and 70 dBA CNEL were calculated. The potential off-site noise impacts caused by an increase of traffic from the operation of the proposed project on the nearby roadways were calculated for the following scenarios:

Existing Year (without Project): This scenario refers to existing year traffic noise conditions.

Existing Year (Plus Project): This scenario refers to existing year + project traffic noise conditions.

Table 6 compares the without and with project scenario and shows the change in traffic noise levels due to the proposed project. It takes a change of 3 dB or more to hear a perceptible difference. As shown in Table 6, the project is anticipated to change the noise by 0.1 dBA CNEL.

Although there is an increase in traffic noise levels, the impact is considered to have **no impact** as the noise levels at or near any existing proposed sensitive receptor would be 73.0 dBA CNEL or less and the change in noise level is 3 dBA or less.

Table 6: Existing Scenario - Noise Levels Along Roadways (dBA CNEL)

Existing Without Project Exterior Noise Levels

Roadway	Segment	CNEL at 50 Ft (dBA)	Distance to Contour (Ft)			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
Mission Rd	Barham Dr to Nordahl Road	73.0	79	170	366	789

Existing With Project Exterior Noise Levels

Roadway	Segment	CNEL at 50 Ft (dBA)	Distance to Contour (Ft)			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
Mission Rd	Barham Dr to Nordahl Road	73.1	81	174	374	806

Change in Existing Noise Levels as a Result of Project

Roadway[1]	Segment	CNEL at 50 Feet dBA[2]			
		Existing Without Project	Existing With Project	Change in Noise Level	Potential Significant Impact
Mission Rd	Barham Dr to Nordahl Road	73.0	73.1	0.1	No

Notes:
[1] Exterior noise levels calculated at 5 feet above ground level.
[2] Noise levels were calculated from the centerline of the subject roadway.

Project Design Features

As noted in the project description, the following noise reduction measure has been implemented into the plan:

- All roof-top exterior equipment will be shielded from view with solid parapets that are taller than the equipment constructed with material with a density of at least 4 lb/ft$_2$.

Construction Noise Impact

The degree of construction noise may vary for different project site areas and depending on the construction activities. Noise levels associated with the construction will vary with the different construction phases.

Construction Noise

The Environmental Protection Agency (EPA) has compiled data regarding noise-generated characteristics of typical construction activities. The data is presented in Table 7.

Table 7: Typical Construction Equipment Noise Levels[1]

Type	Lmax (dBA) at 50 Feet
Backhoe	80
Truck	88
Concrete Mixer	85
Pneumatic Tool	85
Pump	76
Saw, Electric	76
Air Compressor	81
Generator	81
Paver	89
Roller	74

Notes:
[1] Referenced Noise Levels from the FTA noise and vibration manual.

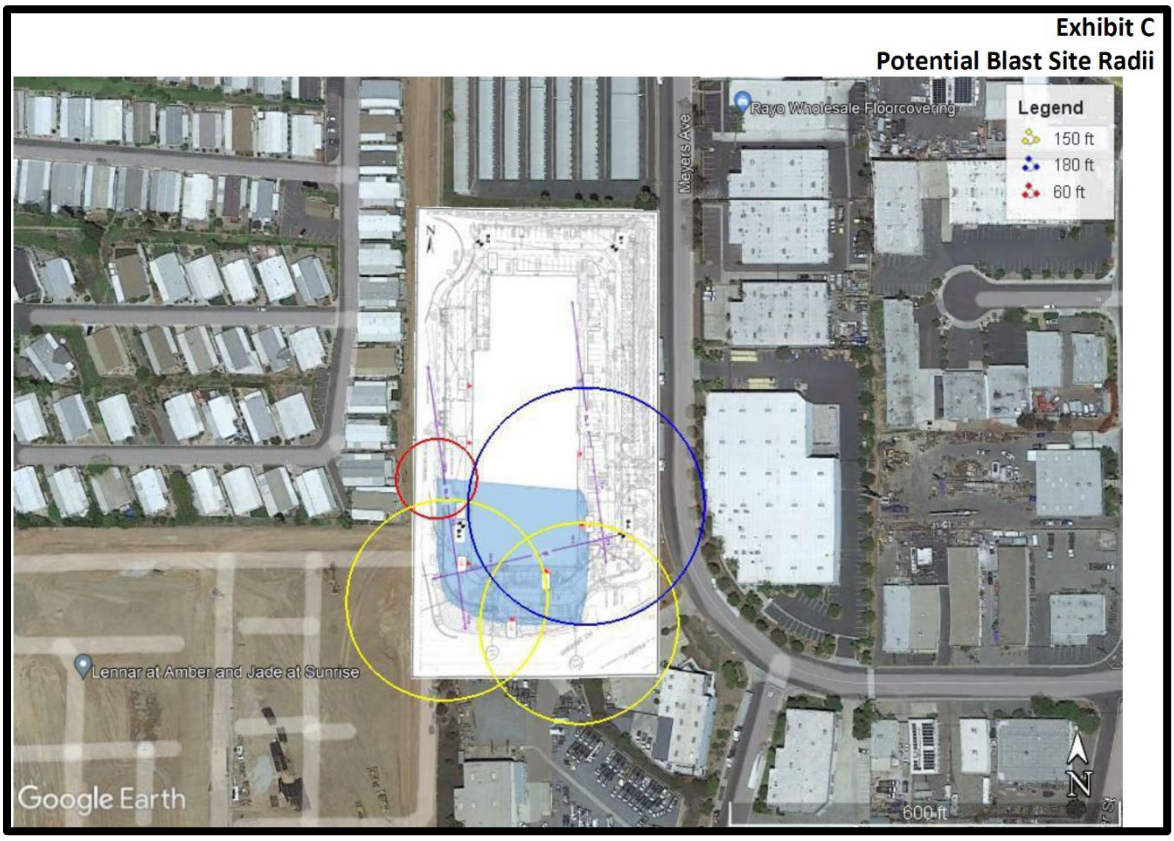
Construction noise is considered a short-term impact and would be considered significant if construction activities are taken outside the allowable times as described in the City's Municipal Code Section 17-234. Construction is anticipated to occur during the permissible hours according to the City's Municipal Code. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing within the project vicinity. Furthermore, noise reduction measures are provided to reduce construction noise further. The impact is considered to have no impact; however, construction noise level projections are provided.

Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be the loudest during the grading phase. During grading, a likely worst-case construction noise scenario assumes using 1-grader, 1-dozer, 1-excavators, 1-scrapers, and 3-backhoes operating at 225 feet from the nearest sensitive receptor.

Assuming a usage factor of 40 percent for each piece of equipment, unmitigated noise levels at 225 feet have the potential to reach 71 dBA Leq at the nearest sensitive receptors during building construction. Noise levels for the other construction phases would be lower, approximately 69 dBA. Therefore, the typical construction noise impact is considered **less than significant** at the surrounding uses.

Blasting During Construction

However, this project will require blasting during the grading phase of construction. MD utilized the calculation methodologies outlined in the 2013 Caltrans Transportation and Construction Vibration Manual, Chapter 11, Section 11.3 – Methods of Predicting Blast Vibration and Air Overpressures. The distance between each potential blast location and the nearest sensitive receptor was measured. The noise and vibration levels were calculated to the nearest sensitive receptors as close as 60 feet, 150 feet, and 180 feet from potential blast site locations (see Exhibit C).



As blasting activity will occur within 300 ft of existing buildings, seismic monitoring is mandatory for the project. Noise and vibration predictions are based upon distances of 60 feet, 150 feet, and 180 feet from the blast site and utilize charge weights ranging from 1 to 5 pounds. Input and output calculations are provided in Appendix B of the Blasting Noise and Vibration Evaluation (Appendix 10).

The project will require sound barriers, which provide a 15 dB reduction for the air blast noise if blasting occurs closer than 150 feet to an existing building. The barriers must block the line of sight from the blasting area to the adjacent buildings. MD recommends that barriers be as close to the blasting location as safely possible for maximum noise reduction.

As noted in the Blasting Noise and Vibration Evaluation (Appendix 10), when blasting occurs at the various locations needed, the noise level at the nearest sensitive receptors will range between 111 to 130 dB using the maximum charge weights and mitigation specified in Table 1 below. The distances in the table are the distances between a blast and a sensitive receptor.

Table 2: Maximum Charge Weights per Distance

Distance (ft)	Max Charge Weight, lbs.
60-150 w/ wall	1
150-180	3
180+	5

If blasting occurs within 150 ft of any building, sound barriers are required during blasting. A sound barrier must be constructed so that the line of sight to all existing windows is obstructed by the barrier, at least 8 feet tall. With the incorporation of sound barriers near the blasting location, the acoustic insertion loss is 15 dB. Therefore, the calculated mitigated noise level would range between 111 to 121 dB, which is approximately 12 dB below the Office of Surface Mining and Reclamation Enforcement's (OSMRE's) 133-dB limit.

Larger charge weights are permittable as long as they are designed, so the overpressure noise does not exceed 130 dB after mitigation. Therefore, the blasting construction noise through the implementation of **MM HAZ-1** through **MM HAZ -5** will be **less than significant with mitigation**.

Construction Noise Reduction Measures

Construction operations must follow the City's General Plan and the Noise Ordinance, which states that construction, repair, or excavation work performed must occur within the permissible hours. As noted in the project description, the following construction noise reduction measures will be implemented during construction:

- Per Municipal Code Section 17.324, construction will only occur during the permissible hours of 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. and 5:00 p.m. on Saturdays. No construction is permitted on Federal, state, or City holidays.
- The contractors shall ensure all equipment will have the appropriate noise attenuating devices.
- The contractors shall locate the equipment staging areas to create the greatest distance between the construction-related noise/vibration sources and the residential (sensitive receptors) nearest the project site.
- Idling equipment will be turned off when not in use.

- Equipment shall be maintained to secure vehicles and their loads from rattling and banging.

dBA = A-weighted sound level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter de-emphasizes the very low and very high-frequency components of the sound in a manner similar to the human ear's response. A numerical method of human rating judgment of loudness.

Leq = Equivalent Sound Level – the sound level corresponding to a steady noise level over a given sample period with the same acoustic energy as the actual time-varying noise level. The energy average noise level during the sample period.

CNEL = Community Noise Equivalent Level – the average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 p.m. and after the addition of ten (10) decibels to sound levels in the night before 7:00 a.m. and after 10:00 p.m.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

Construction activities can produce a vibration that may be felt by adjacent land uses. The proposed project's construction would not require equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is perceptible but below any risk of architectural damage.

The fundamental equation used to calculate vibration propagation through average soil conditions and distance is as follows:

$$PPV_{equipment} = PPV_{ref} (100/D_{rec})^{n}$$

Where: PPV_{ref} = reference PPV at 100ft.
D_{rec} = distance from equipment to receiver in ft.
n = 1.1 (the value related to the attenuation rate through ground)

The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual in Table 8 (below) provide general thresholds and guidelines for the vibration damage potential from vibratory impacts.

Table 8: Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3

Table 8: Guideline Vibration Damage Potential Threshold Criteria		
Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: Table 19, Transportation and Construction Vibration Guidance Manual, Caltrans, Sept. 2013. Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		

Table 9 gives approximate vibration levels for particular construction activities. This data provides a reasonable estimate for a wide range of soil conditions.

Table 9: Vibration Source Levels for Construction Equipment[1]		
Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
[1] Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.		

At a distance of 30 feet, a large bulldozer would yield a worst-case 0.073 PPV (in/sec) which may be perceptible for short periods of time during grading along the southern property line of the project site but is below any threshold of damage. The project will have **no impact,** and no mitigation is required.

Blasting During Construction

However, this project will require blasting during the grading phase of construction. As noted in the Blasting Noise and Vibration Evaluation (Appendix 10), when blasting occurs at the various locations needed, the noise level at the nearest sensitive receptors will range between 111 to 130 dB using the maximum charge weights and mitigation specified in Table 1 below. The distances in the table are the distances between a blast and a sensitive receptor.

Table 2: Maximum Charge Weights per Distance

Distance (ft)	Max Charge Weight, lbs.
60-150 w/ wall	1
150-180	3
180+	5

The predicted vibration level at the nearest sensitive receptors when blasting occurs at the various locations will range between 0.02 to 0.35 PPV in/sec using the maximum charge weights specified. The predicted levels are below OSMRE's limit of 1.25 PPV in/sec limit, 50 Ds. The weights also meet the requirements given in the San Marcos' Blasting Operations code.

If blasting occurs within 150 ft of any building, sound barriers are required during blasting. A sound barrier must be constructed so that the line of sight to all existing windows is obstructed by the barrier, at least 8 feet tall. With the incorporation of sound barriers near the blasting location, the acoustic insertion loss is 15 dB. Therefore, the calculated mitigated noise level would range between 111 to 121 dB, which is approximately 12 dB below the Office of Surface Mining and Reclamation Enforcement's (OSMRE's) 133-dB limit.

Larger charge weights are permittable as long as they are designed such that the overpressure noise does not exceed 130 dB after mitigation and the vibration level does not exceed 0.5 PPV in/sec at the nearest sensitive receptor. Therefore, the blasting construction noise will be **less than significant with mitigation**.

PPV – Known as the peak particle velocity (PPV), the maximum instantaneous peak in vibration velocity is typically given in inches per second.

RMS – Known as the root mean squared (RMS), can be used to denote vibration amplitude.

VdB – A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

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

As noted on page 4.8-39 of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report (EIR), "*As shown in Figure 4.8-6 – Proposed Land Uses Near Airports, there is a heliport located at Palomar Medical Center which allows patients to be flown in or out of the hospital by helicopter. A second helipad is currently proposed, as shown in the figure, as part of*

the Palomar Medical Center West project within the ERTC North SPA. The operation of helipads is regulated by federal, state, and local laws intended to reduce risks of accidents associated with helicopters. In order to receive approvals from the FAA and Caltrans DOA, the existing and proposed helicopter flight paths are required to comply with standard obstruction-clearance criteria to ensure an obstruction-free volume of airspace for pilots using the facility. Compliance with all regulations would ensure that land uses proposed under the proposed project and within the vicinity of these helipads would not pose a risk to public health and safety from helicopter accidents and, therefore, impacts would be less than significant."

The project site is within the area of these helipads. No other airports are within two miles of the project site. However, as stated in the EIR, projects within the vicinity of these helipads would not pose a risk to public health and safety from helicopter accidents and, therefore, impacts would be **less than significan**t.

Mitigation: See **MM HAZ-1** through **MM HAZ-5.**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Population and Housing 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones				

a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?**

The project does not propose new homes or infrastructure extensions. The development of the site will result in a new industrial building. The project site is on an existing street, and utilities and public facilities are all available in the immediate area. No new road or utility infrastructure is required. Therefore, project-related impacts are expected to be **less than significant**, directly, indirectly, or cumulatively.

b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The project site is vacant, and the site's development will not displace any persons or require the construction of replacement housing. Therefore, **no impact** on housing will occur directly, indirectly, or cumulatively.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. 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?	☐	☐	☒	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Public Services
   - Figure 4.14-1 – Fire Service Boundaries
   - Figure 4.14-2 – Police Service Boundaries
   - Figure 4.14-3 – School Service Boundaries
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones

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?**

The project will be served by the Escondido Fire Department (EFD). The fastest response provider is Fire Station #1, located at 310 N. Quince Street, with a response time of 7-minutes. It is located 3.7 miles away from the project site. Stations #3 and #6 are located three (3) miles away. However, their response times are 8-minutes. Station #3 is located at 1808 N. Nutmeg Street, and Station #6 is at 1735 Del Dios Road.

Through reciprocal agreements, the City of San Marcos Fire Station #3, located at 404 Woodland Parkway, can also serve this site and provide a response time of 5-minutes.

Like any development project, the project may increase the demand for fire service; however, the project would not increase the population beyond what was anticipated in the General Plan. Further, the project would be designed and constructed consistent with applicable codes and standards for access and fire suppression infrastructure. The Project will have a **less than significant impact** on fire services, directly, indirectly, or cumulatively.

ii) **Police protection?**

The project will be served by the Escondido Police Department (EPD). Like any development project, the project may increase the demand for police service; however, the project would not increase the population beyond what was anticipated in the General Plan. Escondido's Public Facility Development Fee Ordinance establishes public facility fees for the City, and this project will be required to pay this fee at the time of building permits. This fee is used for all public facilities, including police facilities. The proposed project is planned for under the General Plan and would have a **less than significant impact** on police protection.

iii) **Schools?**

The project is located in the Escondido Union School District. The project is required to pay the state-mandated school fees in place when development occurs. These fees are designed to mitigate impacts on schools by providing funds to construct new facilities. By implementing all regulations and City and School District policies for development projects, the project will have a **less than significant** impact on schools, directly, indirectly, and cumulatively.

iv) **Parks?**

The project will not increase the demand for public parks. The City imposes a fee for residential projects. This fee is designed to reduce the impacts of new development on City park facilities. By implementing all regulations and City policies for development projects, the project will have a **less than significant** impact on parks, directly, indirectly, and cumulatively.

v) **Other public facilities?**

Escondido's Public Facility Development Fee Ordinance establishes public facility fees for the City, and this project will be required to pay this fee at the time of building permits. This fee is used for all public facilities. The proposed project is planned for under the General Plan and would have a **less than significant impact** on other public facilities like libraries and trails.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION – Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that have an adverse physical effect on the environment?	☐	☐	☐	☒
Sources: 1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended 2. General Plan Update Environmental Documents ➢ Volume I Final EIR – Recreation ➢ Figure 4.15-1 – Parks and Recreational Facilities ➢ Figure 4.15-2 – Masters Plan for Park, Trails, and Open Space Trails 3. Chapter 33 Zoning ➢ Article 26 – Industrial Zones				

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

The City of Escondido maintains 20 parks encompassing 344 acres of developed parkland. The project will increase the demand for public parks in a minor way with employees who may use a park for lunch once in a while. However, it will not increase the demand over that planned under the General Plan. The City imposes a fee for residential projects as residential projects put the greatest demand on the need for parks. This fee is designed to reduce the impacts of new development on City park facilities. By implementing all regulations and City policies for development projects, the project will have a **less than significant** impact on parks, directly, indirectly, and cumulatively.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities that have an adverse physical effect on the environment?**

The project provides some landscape areas. It will not require the construction or expansion of recreational facilities as the site was planned for industrial development under the General Plan. Therefore, the project will have **no impact** on recreational facilities, causing an adverse effect on the environment.

Mitigation: None

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

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Transportation and Traffic
   - Figure 4.16-1 – Pedestrian Commuter Mode Share
   - Figure 4.16-2 – Bicycle Paths
   - Figure 4.16-3 – Rapid Bus and Rail Transit
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018
5. Transportation Impact Analysis & Local Mobility Analysis Meyers Industrial Escondido, California, prepared by Linscott Law & Greenspan Engineers, April 7, 2022 (Appendix 14)

a) **Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

The Transportation Impact Analysis & Local Mobility Analysis (Appendix 14), prepared on April 7, 2022, by Linscott Law & Greenspan Engineers, has been used to prepare and is quoted throughout this Section.

CITY OF ESCONDIDO GENERAL PLAN – MOBILITY AND INFRASTRUCTURE ELEMENT

The project is located at 2352 Meyers Avenue and will take access via a single driveway off Meyers Avenue.

The principal roadways analyzed under the project study are described below.

State Route 78 (SR-78) is an east/west freeway facility connecting Oceanside, Vista, San Marcos, and Escondido. SR-78 is generally built with three general-purpose lanes in each direction. The posted speed limit in the study area is 65 MPH. In the study area, local access is provided as follows:

- Westbound SR-78

    - Signalized on/off-ramps at the Nordahl Road diamond interchange
    - Unsignalized on/off ramps from/to Rancheros Drive
- Eastbound SR-78
    - Signalized on/off-ramps at the Nordahl Road diamond interchange
    - Signalized off-ramp to Barham Drive (west of Woodland Parkway)
    - Signalized on-ramp from Barham Drive (east of Woodland Parkway)

E. Barham Drive is an east/west facility classified within the study area on the City of San Marcos Mobility Element as a 4-Lane Arterial with Class II or III bicycle facilities from Woodland Parkway east to the San Marcos city limits with Escondido, just west of Meyers Avenue.

E. Barham Drive is currently built as a four-lane undivided roadway with a two-way left-turn lane median from Woodland Parkway to the east of La Moree Road, where it transitions to a two-lane undivided roadway with a two-lane undivided roadway a two-way left-turn lane median to the City limits. The posted speed limit is 35 mph. The four-lane section provides Class II bicycle lanes, while the two-lane section does not. Sidewalks are present on the south side of the roadway only, with gaps present intermittently. On-street parking is generally prohibited

La Moree Road is a two-lane local collector on the City of San Marcos Mobility Element. The posted speed limit is 25 mph, and curbside parking is prohibited in both directions. Paved sidewalks are provided on both sides of the roadway, and bicycle facilities are not provided.

Mission Road is an east/west facility with portions in San Marcos and Escondido in the study area. Within San Marcos, it is classified on the City of San Marcos General Plan Mobility Element as a Four-Lane Arterial with Enhanced Bicycle/Pedestrian Facilities from Woodland Parkway to the City limits at approximately Barham Drive. The City of San Marcos General Plan Mobility Element defines “Enhanced Bicycle/Pedestrian Facilities” as facilities that are key links for all modes of travel within the City.

Within Escondido, Mission Road is classified as a Major Road in the City of Escondido Circulation Element eastward from the City limits with San Marcos. In the study area, Mission Road is currently constructed as a four-lane roadway with a raised median to the eastern edge of the study area, where it transitions to a two-way left-turn lane. The posted speed limit is 45 mph. Curbside parking is prohibited. Class II bicycle lanes are provided on the San Marcos portion of the roadway within the study area but do not currently continue on the portions within Escondido. However, the Inland Rail Trail, a Class I Sidepath, is provided along E. Mission Road, extending from Barham Drive past the western study limits.

Nordahl Road is a north/south facility classified as a 4-Lane Arterial from SR-78 to the City limits in the City of San Marcos General Plan Mobility Element. It is

classified as a Major Road in the City of Escondido Circulation Element. It is currently constructed with 7 to 8 lanes of divided roadway, depending on the location, due to turn pockets and/or the extension of turn pockets. The posted speed limit is 40 mph. Class II bicycle lanes are provided, and on-street parking is not permitted. Sidewalks are present on both sides of the roadway within the study area.

Auto Park Way is a north/south facility classified as a Major Road on the City of Escondido Circulation Element southward from the City limits with San Marcos. Auto Park Way is currently constructed as a four-to-six-lane roadway with a raised median in the study area. The posted speed limit is 40 mph. Curbside parking is prohibited, and Class II buffered bicycle lanes are provided. Sidewalks are present on both sides of the roadway within the study area.

Meyers Avenue is a two-lane industrial road that is unclassified in the City of Escondido Circulation Element. Meyers Avenue is constructed as a 48-foot-wide two-lane roadway in the study area. There are no posted speed limits in the area, and curbside parking is provided in both directions. No sidewalks or bike lanes are provided.

These roadways are consistent with the General Plan, and the project will not cause a conflict with this plan.

ALTERNATIVE MODES OF TRANSPORTATION

Alternative modes of transportation mean any other way to commute other than driving alone. Examples include biking, walking, carpooling, and taking public transit.

Pedestrian

Pedestrian facilities are intermittently provided within the project study area. No pedestrian facilities are provided along Meyers Avenue.

Bicycles

There are currently Class II bike lanes in each direction of travel on E. Barham Drive, Woodland Parkway, Nordahl Road, and La Moree Road in the vicinity of the project site. Table 11–1 summarizes the existing and future bicycle facility classifications along E. Barham Drive within the study area.

TABLE 11–1
BICYCLE MOBILITY

Street Segment	Existing Condition	Future Classification [a]
Barham Drive		
Woodland Parkway to La Moree Road	Class II Bicycle Lane	Class II Bicycle Lane
East of La Moree Road	Class II Bicycle Lane	Class II Bicycle Lane
Nordahl Road		
North of SR-78 Ramps	Class II Bicycle Lane	Class II Bicycle Lane
La Moree Road		
South of Barham Drive	Class II Bicycle Lane	Class II Bicycle Lane

Source: City of San Marcos Bicycle and Pedestrian Master Plan.

Additionally, the Inland Rail Trail, a Class I Sidepath, is provided along E. Mission Road, extending from Barham Drive past the western study limits.

Public Transit Services

The project site is within 2 miles of the Cal State San Marcos Sprinter light rail station and within 1 mile of the Nordahl Road Sprinter light rail station. Bus stops serving the North County Transit District (NCTD) Routes 305, Route 347, and Route 353 are located approximately 0.5 miles from the project site. Employees will be able to utilize these public transit opportunities. A summary of the available transit service routes is provided below:

The SPRINTER hybrid rail line spans 22 miles and connects Oceanside, Vista, San Marcos, and Escondido – serving 15 stations along the Highway 78 corridor. The SPRINTER runs every 30 minutes in each direction Monday through Friday from approximately 4:00 AM to 9:00 PM. Saturday, Sunday, and holiday trains operate every 30 minutes between 10:00 AM and 6:00 PM and hourly before 10:00 AM and after 6:00 PM.

Route 305 runs from the Vista Transit Center to the Escondido Transit Center with destinations to Palomar College, San Marcos Civic Center, Mission Hills High School, San Marcos Middle School, Vista Transit Center Escondido Transit Center, Arc Enterprises, and DMV. There are 33 stops along this route. Route 305 currently operates Monday through Friday from 4:32 AM through 11:02 PM, departing eastbound from the Vista Transit Center and 4:19 AM through 10:16 PM departing westbound from the Escondido Transit Center. The weekend route schedule begins at 5:32 AM through 11:02 PM, departing eastbound from Vista Transit Center, and begins at 5:15 AM to 10:18 PM, departing westbound from the Escondido Transit Center. Route 305 travels at 30-minute headways on weekdays and 30-minute headways on weekends.

Route 347 runs from Cal State San Marcos to Palomar College with destinations to Cal State University San Marcos, Palomar College, Restaurant Row, Cal State San Marcos SPRINTER Station, and Edwards Cinemas. There are 24 stops along this route. Route 347 currently operates Monday through Friday from 5:20 AM through 7:12 PM, departing westbound from the CSUSM Sprinter Station and from 5:45 AM through 7:36 PM, departing eastbound from Palomar College Transit Center. Saturday route schedule begins at 7:51 AM through 7:12 PM, departing westbound from CSUSM Sprinter Station, and begins at 7:14 AM to 6:35 PM departing eastbound from Palomar College Transit Center. Route 347 does not operate on Sundays. Route 305 travels at 30-minute headways on weekdays and 60-minute headways on Saturdays.

Route 353 serves the Escondido Transit Center and Nordahl Marketplace via Citracado Parkway. Route 353 operates on weekdays, weekends, and holidays from approximately 6 AM to 8 PM. The closest stop to the project site is located at

the Nordahl Road SPRINTER station. Route 353 travels westbound to the Nordahl Marketplace and eastbound to the Escondido Transit Center.

CITY CAPITAL IMPROVEMENT PROGRAM (CIP)

No CIP projects are proposed for Meyers Avenue.

CONGESTION MANAGEMENT PLAN (CMP) & REGIONAL TRANSPORTATION PLAN (RTP)

The San Diego Association of Governments (SANDAG) meets the federal congestion management provisions through existing SANDAG planning and performance monitoring activities, such as the Regional Transportation Plan (RTP) and other multimodal performance monitoring efforts. Federal congestion management provisions are more flexible and utilize the RTP as the primary tool to solve congestion. The RTP includes identifying and evaluating anticipated performance and expected benefits of appropriate congestion management strategies (demand management, operational improvements, transit improvements, systems management improvements, etc.). Since the City and SANDAG work together for consistency between the City's General Plan and SANDAG's 2014 Regional Transportation Plan (RTP), and the project is consistent with the City's General Plan, it is also consistent with the CMP and RTP.

SUMMARY

The project will not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities as designed and conditioned. It will have a less **than significant impact**, directly, indirectly, or cumulatively.

b) **Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

To comply with the requirements of SB 743, the City of Escondido has prepared its *Transportation Impact Analysis Guidelines* (April 2021) to provide guidance on conducting transportation impact analyses in the City as follows:

- CEQA Analysis Requirements: Requirements for conducting CEQA analysis, which consists of SB 743-consistent VMT analysis and assessing impacts to pedestrians, bicyclists, transit, hazards, emergency access, and other impacts.
- Local Mobility Analysis Requirements: Requirements for conducting LOS analysis, site access assessments, and other local transportation analyses for non-CEQA purposes.

The Transportation Impact Analysis and Local Mobility Analysis (Appendix 14) presents an SB 743-consistent VMT analysis to determine and evaluate the potential impacts on the local roadway system due to the proposed project.

Based on the City of Escondido *Transportation Impact Analysis Guidelines,* the significant thresholds and specific VMT metrics used to measure VMT are described by land-use type below, as shown in *Table 4–1*. The project proposes an Industrial Employment land-use type. Therefore, a potentially significant impact would be identified if the project VMT per employee were greater than the regional average.

TABLE 4–1
VMT IMPACT THRESHOLDS BY LAND USE TYPE

Land Use Type	Impact Threshold
Residential	15% below regional average VMT/capita
Employment	15% below regional average VMT/employee
Industrial Employment	***At or below regional average VMT/employee***
Mixed-Use	Each project component evaluated per the appropriate metric based on land use type
Regional Retail, Regional Recreational, or Regional Public Facilities	A net increase in total regional VMT using the boundary method.

***Source**:* City of Escondido Transportation Impact Analysis Guidelines (April 2021)

The SANDAG ABM2+ Year 2016 Travel Demand Model (found here: https://sandag.maps.arcgis.com/apps/webappviewer/index.html?id=bb8f938b625c40cea14c825835519a2b) was used to calculate the Regional average baseline and the project-specific VMT per employee. The model generates a land use-specific average trip length as well as an average daily volume, which ultimately calculates the total VMT per employee. The SANDAG Series 14 Year 2016 Travel Demand Model results are included in *Appendix C* of the Transportation Impact Analysis and Local Mobility Analysis (Appendix 14).

Table 4–2 summarizes the Regional average baseline VMT results provided by SANDAG. Table 4–2 shows that the Regional average baseline VMT per employee is 18.9 miles. To determine the significance of VMT impacts, the project VMT per employee would need to be at or below the Regional average to result in a less-than-significant transportation impact.

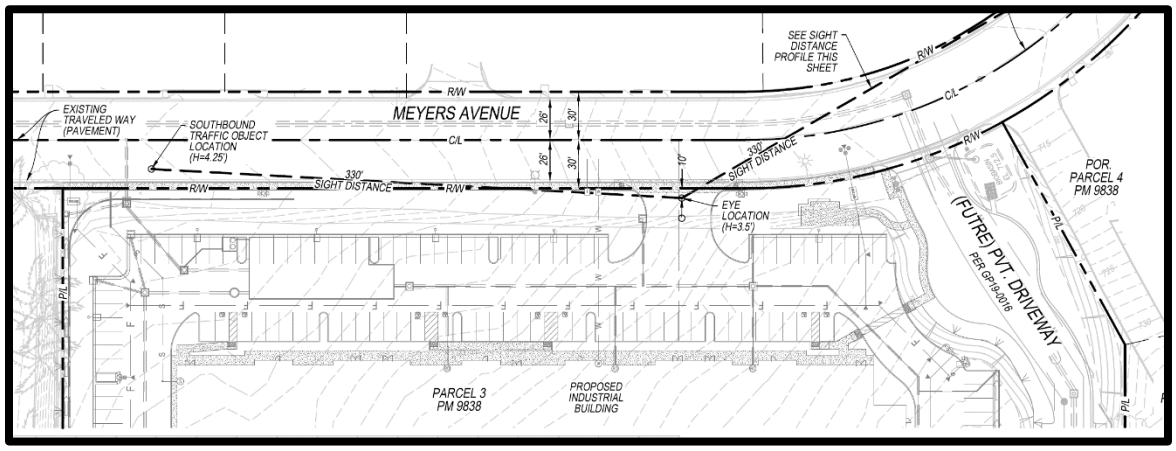
Similar to the Regional average baseline calculations, the project VMT per employee was determined. Table 6–1 shows that the project-specific VMT per employee is calculated at 18.6 VMT per employee per the SANDAG ABM2+ Year 2016 Travel Demand Model.

Since the project-specific VMT per employee is lower than the Regional average, the project is calculated to result in a **less-than-significant** transportation impact, and mitigation measures are not required.

TABLE 4–2 PROJECT VMT FINDINGS				
Scenario	**Regional Baseline VMT per Capita**	**Significance Threshold**	**Project VMT per Capita**	**Significant Transportation Impact? (Over Threshold)**
VMT per Employee	18.9	18.9	18.6	No

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

A driveway on Meyers Avenue will provide access to the project site. The driveway will be improved in compliance with recommended roadway classifications and respective cross-sections in the City of Escondido General Plan. The City Engineer has reviewed the project site plan for sight distance at the project access point concerning standard City sight distance standards. The driveway sight distance will meet City Design Standards for and Industrial Roadway classification design speed for Meyers Avenue of 35 miles per hour (mph) at 330 feet. A sight distance compliance measure would require Meyers Avenue to be striped red "No Parking" at the corner radius opposite the driveway entrance (along the street frontage of APN 228-312-17-00) to ensure appropriate sight distance at the project driveway.



In addition, further review will take place at the time of final grading, landscaping, and street improvement plans. Signing/striping will be implemented in conjunction with detailed construction plans for the project site.

The project will have a **less than significant** impact, directly, indirectly, or cumulatively, on creating or increasing hazards or incompatible uses with the above provisions.

d) **Result in inadequate emergency access?**

Emergency access to the site will be provided during the development's construction and operational phases. Construction activities may temporarily restrict vehicular traffic. Temporary changes to the existing roadway network require the approval of the City of Escondido and notification to all emergency responders. Pursuant to **MM HAZ-5,** preparing a construction management plan to the specifications and approval of the City of Escondido will ensure temporary traffic impacts from construction will maintain adequate access for emergency vehicles and evacuation procedures during construction.

As designed, the project has been reviewed for both on-site and off-site safety hazards by Engineering and Fire to ensure adequate emergency access. The project will have **less than significant impact with mitigation** on emergency access, directly, indirectly, or cumulatively.

Mitigation: See **MM HAZ-5**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Cultural and Paleontological Resources
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
   - Article 40 – Historical Resources
4. Cultural Resources Study for 2351 Meyers Avenue Project (Tentative Parcel Map P18-00011), Escondido, California, prepared by Red Tail Environmental, December 2, 2020 (Appendix 5)

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

i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**

Pursuant to AB 52 (Gatto, 2014) and Public Resources Code § 21080.3.1, the City sent formal notification letters on May 19, 2022, to the following tribes.

- San Luis Rey Band of Mission Indians
- Soboba Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Mesa Grande Band of Diegueño Mission Indians
- San Pasqual Band of Mission Indians

The Rincon Band of Luiseño Indians responded on June 5, 2022, requesting a consultation with the City. The San Luis Rey Band of Mission Indians responded on June 6, 2022, requesting a consultation with the City. The City consulted with the Rincon Band of Luiseño Indians representative on July 5, 2022, and with the San Luis Rey Band of Mission Indians representative on June 30, 2022. Through the consultation process, mitigation measures were prepared for inclusion within this environmental analysis.

Mitigation measures resulting from tribal consultation **MM TCR-1** – **MM TCR-10** will be applied to the project. Therefore, the Project will have a **less than significant impact with mitigation**, directly, indirectly, or cumulatively, on any cultural resource defined by Public Resources Code Section 5020.1(k).

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

See response Section XVIII a) above. As referenced, the consulting tribes requested the implementation of mitigation measures **MM TCR-1** – **MM TCR-10** to address significant resources that may be present on the site. Therefore, the project will have **less than significant impact with mitigation**, directly, indirectly, or cumulatively, on Tribal Historical Resources.

Mitigation:

MM TCR-1: Prior to the issuance of a grading permit, the Applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a Pre-Excavation Agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe"). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures **MM-TCR-1** through **MM-TCR-10** and the following information:

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

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

pre-construction meeting, shall approve all persons involved in the monitoring program.

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

MM TCR-4: During the initial grubbing, site grading, excavation, or disturbance of the ground surface (including both on- and off-site improvement areas), the qualified archaeologist and the Native American monitor shall be present full-time. If the full-time monitoring reveals that the topsoil throughout the Project impact area (both on and off-site) has been previously removed during the development of the roads and buildings within the Project area, then a decrease of monitoring to part-time monitoring or the termination of monitoring can be implemented, as deemed appropriate by the qualified archaeologist in consultation with the Native American monitor. The frequency of subsequent monitoring shall depend on the excavation rate, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. In consultation with the Native American monitor, the qualified archaeologist shall be responsible for determining the duration and frequency of monitoring considering these factors. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits (i.e., soil conditions are comprised solely of fill or granitic bedrock).

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

MM TCR-6: If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and

15064.5(c), the archaeologist shall immediately notify the City of said discovery. In consultation with the City, the qualified archaeologist, the consulting TCA Tribe(s), and the Native American monitor shall determine the significance of the discovered resource. The qualified archaeologist shall make a recommendation for the tribal cultural resource's treatment and disposition in consultation with the TCA Tribe(s) and be submitted to the City for review and approval. Appropriate treatment measures will be implemented if the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a)(c). Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

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

MM TCR-8: As specified by California Health and Safety Code section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where a forensic anthropologist discovered them unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No

further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning the treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on-site in the presence of the MLD unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.

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

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

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Utilities and Service Systems
   - Figure 4.17-1 – Water Service Boundaries
   - Figure 4.17-2 – Wastewater Service Area
3. Chapter 33 Zoning
   - Article 26 – Industrial Zones
4. Rincon del Diablo Municipal Water District 2020 Urban Water Management Plan June 2021

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Water

See also responses Section X above and XIX b) below for additional information.

The Rincon del Diablo Municipal Water District (RDD) will serve the project. RDD has provided a letter indicating the project is located in RDD's Improvement District 1 service area and is eligible to receive potable water for normal domestic and fire in accordance with all District Rules and Regulations. The project will connect to the existing 8-inch water line in Meyer Avenue.

RDD adopted its Urban Water Management Plan (UWMP) June 2021. The UWMP RDD demonstrates that that is can reliably meet current and future water demands for the District customers through 2045. In addition, it has been confirmed in San Diego County's Water Authority's 2020 UWMP and Metropolitan's 2020 UWMP.

The project will not require or result in the relocation or construction of new or expanded water lines or facilities that could cause significant environmental effects. Therefore, the project will have a **less than significant** effect on water facility expansion, directly, indirectly, or cumulatively.

Wastewater Treatment

See also response Section X above and XIX c) below for additional information.

The project is located in the Escondido Wastewater Division sewer service area. Per the letter dated December 16, 2021, from the City, the project is eligible for sewer service, and the City has the capacity to serve the project. The project will connect to the existing 8-inch sewer line in Meyers Avenue.

Wastewater is treated at the Hale Avenue Resource Recovery Facility (HARRF), an activated sludge secondary treatment facility. Escondido operates the HARRF to benefit the City and the Rancho Bernardo area of the City of San Diego. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day; the average daily flow is 12.7 MGD, comprised of Escondido's flow of 9.7 MGD and Rancho Bernardo's flow of 3.0 MGD.

The project will implement the General Plan and will have a **less than significant** effect on directly, indirectly, or cumulatively expanding wastewater facilities.

Storm Water Drainage

Per Response X) a), the project must comply with Article 55 – Grading and Erosion Control, Chapter 22 – Wastewaters, Stormwaters, and Related Matters of the City's Municipal Code, City of Escondido Storm Water Design Manual, and the MS4 permit. The storm drains will outlet into Meyers Avenue. Therefore, the project will be designed for compliance with existing federal, state, and local water quality laws and regulations pertaining to water quality standards, ensuring a **less than significant impact** on stormwater drainage facility expansion, directly, indirectly, or cumulatively.

Electric Power & Natural Gas

San Diego Gas and Electric (SDG&E) will provide electricity and gas to the project. Per the letter dated January 7, 2022, SDG&E has indicated that facilities can be made available at the project site.

The project is consistent with the City's General Plan, and SDG&E has committed to providing services to the General Plan buildout. The project will not require or

result in the relocation or construction of new or expanded electric or gas power facilities, which could cause significant environmental effects. Therefore, the project will have a **less than significant** effect on electric or gas power expansion.

Telecommunications Facilities

AT&T will provide telephone services, and Cox Communications will provide cable services for the project. Both providers have provided "will serve" letters. Connections to these providers' facilities will be made using existing facilities in Meyers Avenue. Therefore, the project will have a **less than significant** effect on telecommunication facility expansion.

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

See also response Section X above for additional information.

RDD does not use groundwater to supply water to its customers. Therefore, the project will have **no impact** on groundwater supplies.

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

See also response Section X and XIX a) above for additional information.

Wastewater is treated at the Hale Avenue Resource Recovery Facility (HARRF), an activated sludge secondary treatment facility. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day; the average daily flow is 12.7 MGD, comprised of Escondido's flow of 9.7 MGD and Rancho Bernardo's flow of 3.0 MGD.

The project will implement the General Plan and will have a **less than significant** effect on directly, indirectly, or cumulatively expanding wastewater facilities.

d) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Escondido Disposal, Inc. is responsible for collecting and disposing solid waste and recyclables from homes, businesses, and industries in the proposed project area. California requires that not less than 75 percent of solid waste generated be source reduced, recycled, or composted. Programs like green waste, glass, aluminum, paper, cardboard, and commercial organic recycling, will help the City, and this project will reduce the solid waste taken to the landfill.

The requirement for construction/demolition waste is one of the recycling programs mentioned above. The project will generate construction/demolition waste (CDW) as well as ongoing domestic waste from the residential uses on-site, creating an

incremental increase in demand for solid waste service systems and landfill capacity. It is presumed that construction waste would be comprised of concrete, metals, wood, landscape, and typical domestic material. The California Integrated Waste Management Act (CIWMA) of 1989 mandates that all cities and counties in California reduce solid waste disposed at landfills generated within their jurisdictions by 50% and has a long-term compliance goal of 70%. CDW associated with the project will be recycled to the extent practicable, with the remainder sent to a landfill.

The project will be required to reduce landfill waste by diverting a minimum of 50 percent of the construction and demolition debris resulting from that project from the landfill in compliance with state and local statutory goals and policies.

The project is consistent with the General Plan. Future project tenants would be required to pay solid waste collection fees to offset the project's incremental demand for solid waste services and facilities. Between the mandates for reductions in what is sent to the landfill and the fees to offset the demand on the landfill, landfill capacity is available now to accommodate this project and will be available in the future. The project will have a **less than significant impact** on landfills directly, indirectly, and cumulatively.

e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Federal, state, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to assure adequate landfill capacity through mandatory reductions in solid waste quantities (for example, through recycling and composting of green waste) and the safe and efficient transportation of solid waste. The project will comply with all regulatory requirements regarding solid waste, including AB 939 and AB 341. AB 939, administered by the California Department of Resources Recycling and Recovery, required local governments to achieve a landfill diversion rate of at least 50 percent by January 1, 2000, through source reduction, recycling, and composting activities. Moreover, AB 341 increased the minimum solid waste diversion rate to 75 percent in 2020. Such regulations will apply to this project, and compliance is mandatory. Further, mandates set forth by the CALGreen Code aim to reduce solid waste generation and promote recycling and diversion design and activities, to which this project is required to comply. There will be **no impacts,** directly, indirectly, or cumulatively, regarding compliance with federal, state, and local statutes and regulations related to solid waste.

Mitigation: None

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **Would the project:**				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk, or that may result in temporary or ongoing impacts on the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Sources:

1. City of Escondido General Plan, May 2012, Resolution 2012-52, as amended
2. General Plan Update Environmental Documents
   - Volume I Final EIR – Hazards and Hazardous Materials
   - Figure 4.8-2 – Wildfire Risk
   - Figure 4.8-4 – Emergency Evacuation Routes
3. Chapter 7 – Local Emergency
4. Chapter 33 Zoning
   - Article 26 – Industrial Zones
5. CalFire FHSZ Viewer, accessed May 29, 2022
6. San Diego County Multi-Jurisdictional Hazard Mitigation Plan – City of Escondido
7. San Diego County Operational Area Emergency Plan (OAEP)

a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

The project site is located within an urban area of the City and not within a very high fire severity zone. As stated in response Section IX f) above, the project will have access off Meyers Avenue which is not one of the streets on Figure 4.8-4 – Emergency Evacuation Routes of the Escondido General Plan, Downtown Specific Plan, and Climate Action Plan Environmental Impact Report. It is one of the existing streets within the City's established street system. The project will not alter the current circulation pattern in the project area. Therefore, emergency access and evacuation routes will be unaffected by the project.

Construction activities may temporarily restrict vehicular traffic. Temporary changes to the existing roadway network require the approval of the City of Escondido and notification to all emergency responders. Pursuant to **MM HAZ-5,**

preparing a construction management plan to the specifications and approval of the City of Escondido will ensure temporary traffic impacts from construction will maintain adequate access for emergency vehicles and evacuation procedures during construction.

The project provides adequate emergency vehicle access, including street widths and vertical clearance on new streets. Implementing federal, state, and local laws and regulations in the project's construction will ensure a **less than significant impact with mitigation** on adopted emergency response or evacuation plans.

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

In addition to response Section IX g) above,

The project site is located in an urbanized area of the City. The site is not located in a Fire Hazard Severity Zone, as noted on the CalFire Fire Hazard Severity Zone Viewer. The project will include a new industrial building to be built to the latest Building and Fire Codes. The project will have **no impact** on exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

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

The project site is fully developed in an urbanized area of the City. It will not require installing or maintaining associated infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts on the environment. As such, the project will have **no impact**, directly, indirectly, or cumulatively.

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

In addition to response IX g) above, it is noted that the project site is fully developed in an urbanized area of the City along Meyers Avenue. Therefore, the project will have **no impac**t directly, indirectly, or cumulatively, as it is not expected to have a wildland fire on-site and will not expose people or structures to significant risk from flooding or landslides as a result of a post-wildfire.

Mitigation: See **MM HAZ-5**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE – Would the project:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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 project, and the effects of probable future projects.)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

Biological Resources

In Section IV (Biological Resources), the analysis found that the project site had no endangered, rare, or threatened species had no value as habitat to endangered, rare, or threatened species, and would have **less than significant impact** on these resources. Where the City has land-use authority to impose biology-related standard conditions on the project, it may do so. Still, such conditions do not affect the conclusion that the project site has no value as a habitat for endangered, rare, or threatened species.

Cultural & Tribal Resources

As described in Section V (Cultural Resources) and Section XVIII (Tribal Cultural Resources), the project would not impact any known historic, archaeological, paleontological, or tribal cultural resources. Nevertheless, it is possible that resources would be encountered at subsurface levels during ground-disturbing construction activities. To reduce potential adverse effects to post-review discoveries during

project implementation, procedures for inadvertent discovery of resources will be implemented through mitigation measures **MM TCR-1** through **MM TCR-10**.

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 project, and the effects of probable future projects.)?**

The project cumulatively adds to the impacts of aesthetics, air quality, biological resources, cultural resources, energy, greenhouse gas emission, hazards & hazardous materials, hydrology/water quality, noise, paleontological resources, public services, recreation, transportation, tribal cultural resources, and utilities/service systems. However, the project is generally consistent with the City's General Plan 2030 Update. As such, cumulatively considerable impacts associated with the project would be **less than significant.** The project does not have impacts that are individually limited but cumulatively considerable.

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

Direct and indirect environmental effects on human beings were analyzed in the following sections: aesthetics, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use and planning, noise, population/housing, public services, recreation, transportation, and utilities/services systems. As found in the discussion of each relevant section, there are no potential impacts that cannot be fully mitigated to less-than-significant levels. Furthermore, the project would comply with all applicable federal, state, and local policies and regulations. The project would not result in environmental effects that would cause substantial adverse effects on human beings, and impacts would be **less than significant with mitigation**. With the implementation of **MM HAZ-1** – **MM HAZ-5,** impacts can be mitigated to less than significant.