

220 North Quince Street Senior Housing Project

PHG 17-0028, ENV 17-0008

Draft Mitigated Negative Declaration /
Initial Study Environmental Checklist

June 2019

Prepared for:

City of Escondido
201 N Broadway
Escondido, CA 92025

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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ACRONYMS

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADT	average daily trips
AMSL	above mean sea level
ATS	advanced treatment systems
BAT	best available technology
BCT	best conventional pollutant control technology
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emission Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CASQA	California Storm Water Quality Association
CBC	California Building Code
CCR	California Code of Regulations
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
CFS	cubic feet per second
CH ₄	methane
City	City of Escondido
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
County	San Diego County
CRHR	California Register of Historical Resources
CSMP	Construction Site Monitoring Program
cy	cubic yards
dB	decibel
dBA	A-weighted decibels
DPM	diesel particulate matter
Draft MHCP	Draft Escondido Multiple Habitat Conservation Program
E-CAP	City of Escondido Climate Action Plan
EDR	Environmental Data Resources, Inc.
EFD	Escondido Fire Department
EMT	Emergency Medical Technician
EPD	Escondido Police Department
EQR	Environmental Quality Regulations
ESA	Environmental Site Assessment
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency

General Plan GHG	City of Escondido General Plan greenhouse gas
HELIX	HELIX Environmental Planning
HFCs	hydrofluorocarbons
HIST	Hazardous Substance Storage Container Database
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IBC	International Building Code
JURMP	Jurisdictional Urban Runoff Management Plan
LCFS	Low Carbon Fuel Standard
LEQ	one-hour average equivalent sound level
LID	low-impact development
LLG	Linscott, Law & Greenspan, Engineers
LOS	Level of Service
MBCE	Marc Boogay Consulting Engineer
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MEI	maximally exposed individual
MLD	Most Likely Descendant
mph	miles per hour
MS4	Municipal Separate Storm Sewer Systems
MT	metric ton
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCTD	North County Transit District
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PCE	perchloroethylene
PDP	Priority Development Project
PFCs	perfluorocarbons
PM ₁₀	Particulate matter smaller than 10 microns in diameter
PM _{2.5}	Particulate matter smaller than 2.5 microns in diameter
PRC	Public Resources Code
RAQS	Regional Air Quality Strategy
RCNM	Road Construction Noise Model
REAP	Rain Event Action Plan
ROG	reactive organic gases
RWQCB	San Diego Regional Water Quality Control Board

SANDAG	San Diego Association of Governments
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDG&E	San Diego Gas and Electric Company
sf	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SCAQMD	South Coast Air Quality Management District
SCST, Inc.	SCST
SR-	State Route
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Program
SWRCB	State Water Resources Control Board
SUSMP	Standard Urban Storm Water Mitigation Plan
TAC	Toxic Air Contaminant
TCA Tribes	Native American tribes that are traditionally and culturally affiliated with the project location (Kumeyaay and Luiseño tribes)
TIA	Transportation Impact Analysis
UST	underground storage tank
VdB	vibration decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds

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CITY OF ESCONDIDO
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201 North Broadway
Escondido, CA 92025-2798
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DRAFT MITIGATED NEGATIVE DECLARATION

220 North Quince Street Senior Housing Project
City File Nos. ENV 17-0008 and PHG 17-0028

An Initial Study Environmental Checklist was prepared for this project and is included with this Draft Mitigated Negative Declaration (MND). The information contained in the Initial Study Environmental Checklist will be used by the City of Escondido to assess this project as required by the California Environmental Quality Act (CEQA) and State CEQA Guidelines, as well as related City Ordinances and Regulations.

This MND assesses the environmental effects of the proposed 220 North Quince Street Senior Housing Project located at 220 North Quince Street, Escondido, CA 92025 (Assessor's Parcel Number 229-331-10-00). The approximately 1.47-net-acre project site is located at the northeast corner of West Valley Parkway and North Quince Street within the Downtown Specific Plan – Gateway Transit District. The project proposes to construct a five-story, affordable senior housing development with ground-floor parking and four stories of residences above. The residential building would include 145 dwelling units at a density of 97.9 units/gross acre (98.3 units/net acre) and 142 parking spaces. The project would include an amendment to the Downtown Specific Plan to remove the requirement for ground-floor retail or office uses and to change the open space requirement for senior housing projects.

As mandated by State CEQA Guidelines Section 15105, affected public agencies and the interested public may submit comments on the Draft MND in writing before the end of the 30-day public review period starting on June 7, 2019 and ending on July 8, 2019. Written comments on the Draft MND should be submitted to the following address by 5:00 p.m., July 8, 2019.

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

Contact: Adam Finestone, AICP, Principal Planner
Telephone: (760) 839-6203
Fax: (760) 839-4313
Email: afinestone@escondido.org

All comments received will be considered with the Final MND in determining whether to approve the project. A printed copy of this document and associated plans and/or documents are available for review during normal operation hours for the duration of the public review period at the City of Escondido Planning Division at the address shown above, and also available on the City's Website at: <https://www.escondido.org/planning.aspx>. The City of Escondido General Plan Update (2012); Final Environmental Impact Report (2012); and Climate Action Plan are incorporated by reference pursuant to Section 15150 of the State CEQA Guidelines. These documents are available for review at, or can be obtained through, the City of Escondido Planning Division or on the City of Escondido website.

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ENVIRONMENTAL CHECKLIST FORM

1. Project title and case file number: 220 North Quince Street Senior Housing – PHG17-0028, ENV17-0008
2. Lead agency name and address: City of Escondido, 201 North Broadway, Escondido, CA 92025
3. Lead agency contact person name, title, phone number and email: Adam Finestone, Principal Planner, (760) 839-6203, afinestone@escondido.org
4. Project location: 220 North Quince Street, Escondido, CA 92025
5. Project applicant's name, address, phone number and email: Matthew Jumper, San Diego Interfaith Housing Foundation, 7956 Lester Avenue, Lemon Grove, CA 91945, 619-668-1532 ext. 313, mjumper@sdihf.org
6. General Plan designation: Specific Planning Area
7. Zoning: Downtown Specific Plan – Gateway Transit District (S-P)
8. Description of project:

The 220 North Quince Street Senior Housing project site is located in the City of Escondido (City), east of Interstate (I-) 15 at the northeast corner of West Valley Parkway and North Quince Street (Figure 1, *Regional Location*; Figure 2, *Project Vicinity*). The project site is approximately 1.47 net acres (1.488 gross acres) and is developed with three approximately 10,000-square-foot (sf) warehouse buildings and one approximately 2,000-sf building formerly used as a maintenance and repair facility for a moving and storage company. A small paved and striped parking area, as well as driveways and other parking areas formerly utilized for outdoor storage are located within the site. The project site consists of one parcel that is relatively flat in topography with a slight downward slope toward the northeast. On-site elevations range from approximately 635 to 647 feet above mean sea level (AMSL).

The project proposes to construct a five-story, affordable senior housing development with ground-floor parking and four stories of residences above (Figures 3a, *Site Plan – Podium Level*, and 3b, *Site Plan – Ground Level*). The project would construct 145 residential units (97.9 units/gross acreage, or 98.3 units/net acreage density) and provide 142 parking spaces. The entrance lobby would be located at the street (parking) level facing North Quince Street. Two courtyards would be provided at the podium (second) level and would be open to the northeastern edge of the property. An overlook plaza would be provided in the southwest corner of the podium level, facing the intersection of North Quince Street and West Valley Parkway. A leasing area and a 4,800-sf community room with a kitchen, office, and laundry facilities also would be provided at the podium level. New curbs, gutters, sidewalks, and street trees would be provided along the project's western and southern frontages along North Quince Street and West Valley Parkway, respectively. The driveway entry into the ground-level parking would be located near the northwestern corner of the

project from North Quince Street. Storm drain improvements, upsizing of water and sewer mains, and connections to existing public utility and upsized water and sewer lines would be required (Figure 4, *Preliminary Grading and Utility Plan*).

Project construction would begin in January 2020 and is expected to last two years. Construction activities include site preparation, demolition, grading, installation of underground infrastructure and utilities, construction of structures, paving of the site, and architectural coating. Site preparation would include removal of existing improvements, topsoil, vegetation, and debris. The top five feet of existing soil would be excavated, backfilled, and compacted. Remedial grading is anticipated to require approximately 1,000 cubic yards (cy) of soil movement (cut/fill).

9. Surrounding land uses and setting:

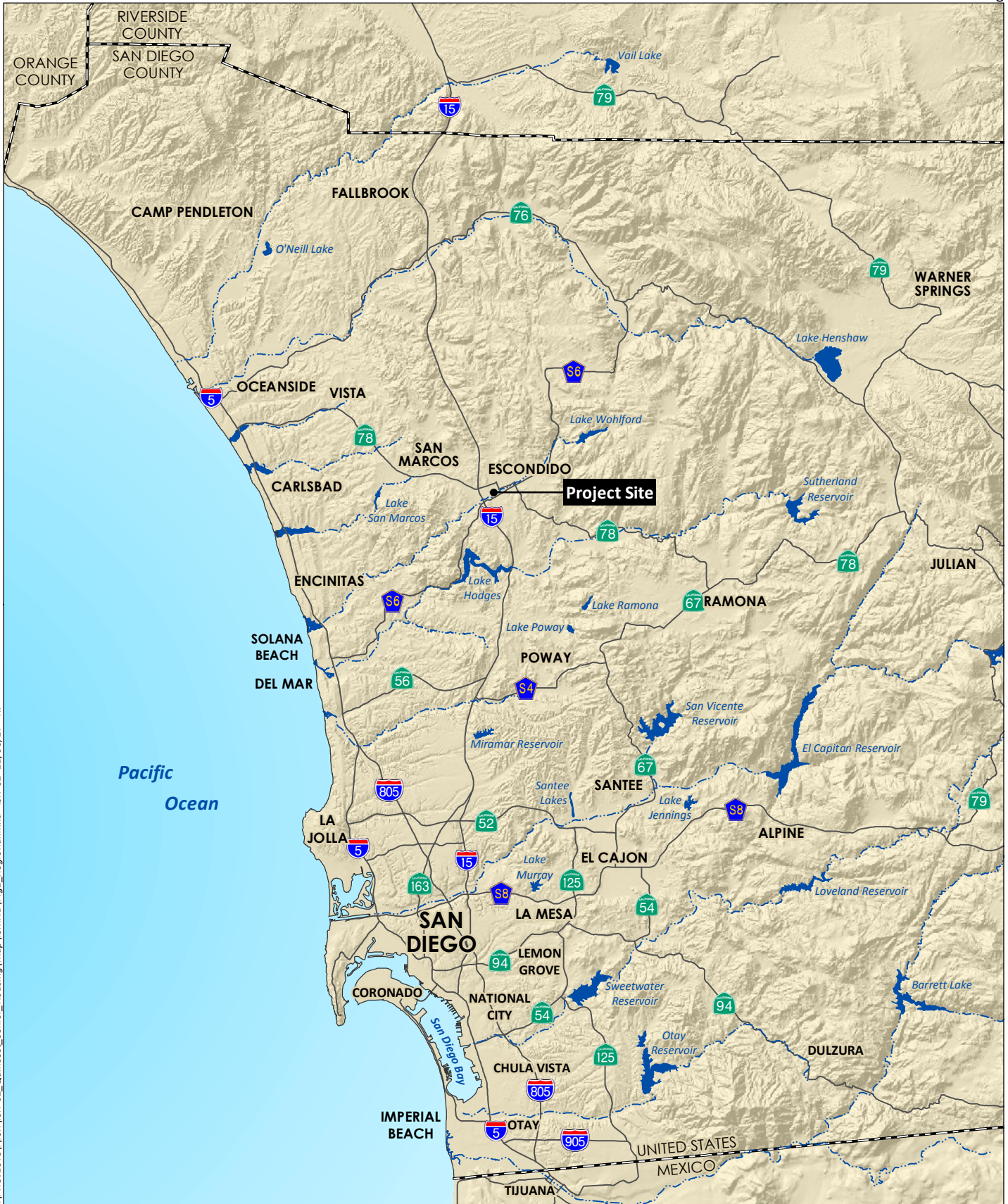
The area surrounding the project site is primarily developed with commercial and industrial uses. The channelized Escondido Creek runs north of the project site, beyond which is the Escondido Fire Department Station 1, located at 310 North Quince Street #1. East of the project site is a storage facility and commercial offices. A new bank is currently under construction across West Valley Parkway to the south of the project site. Directly across the street of the project to the west is the North County Transit District (NCTD) Escondido Transit Center and Sprinter Station.

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

The project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction of Land Disturbance Activities (State Water Resources Control Board [SWRCB] Order No. 2009-0009-DWQ, NPDES No. CA2000002), as well as related City requirements for storm water and erosion control.

11. Have California Native American tribes traditionally or culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Assembly Bill (AB) 52, the City sent notification to four Native American Tribes traditionally and culturally affiliated with the project area on December 18, 2017. Both the Rincon Band of Luiseño Indians and San Luis Rey Band of Mission Indians responded within the 30-day period requesting consultation and additional information. No response was received from the Soboba Band of Luiseño Indians or the Mesa Grande Band of Mission Indians. Consultation concluded on January 24, 2018 with the Rincon Band and on March 1, 2018 with the San Luis Rey Band. Please see Section XVIII of the Initial Study Environmental Checklist for more detail.



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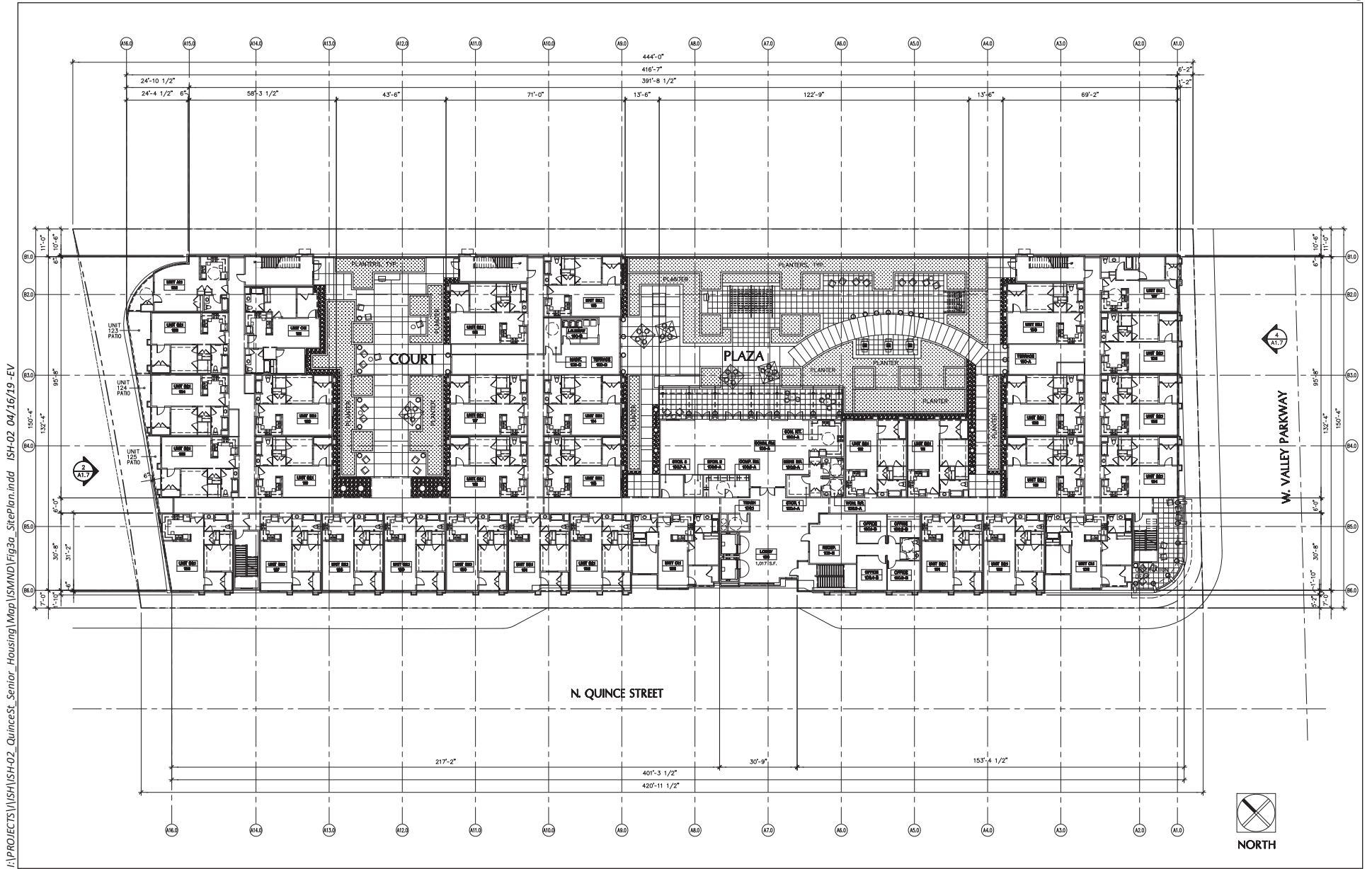
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Source: Aerial (SanGIS, 2014)

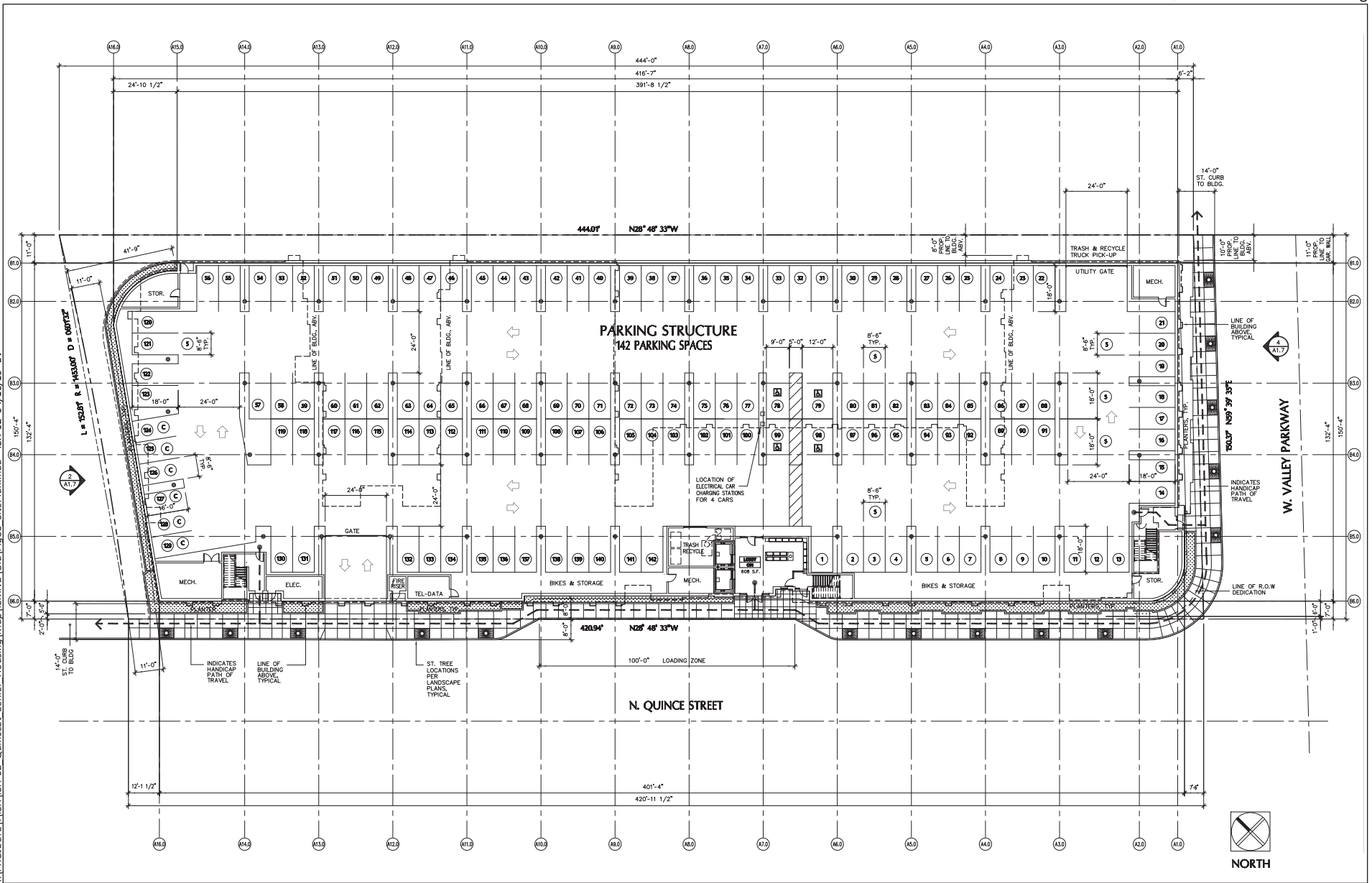




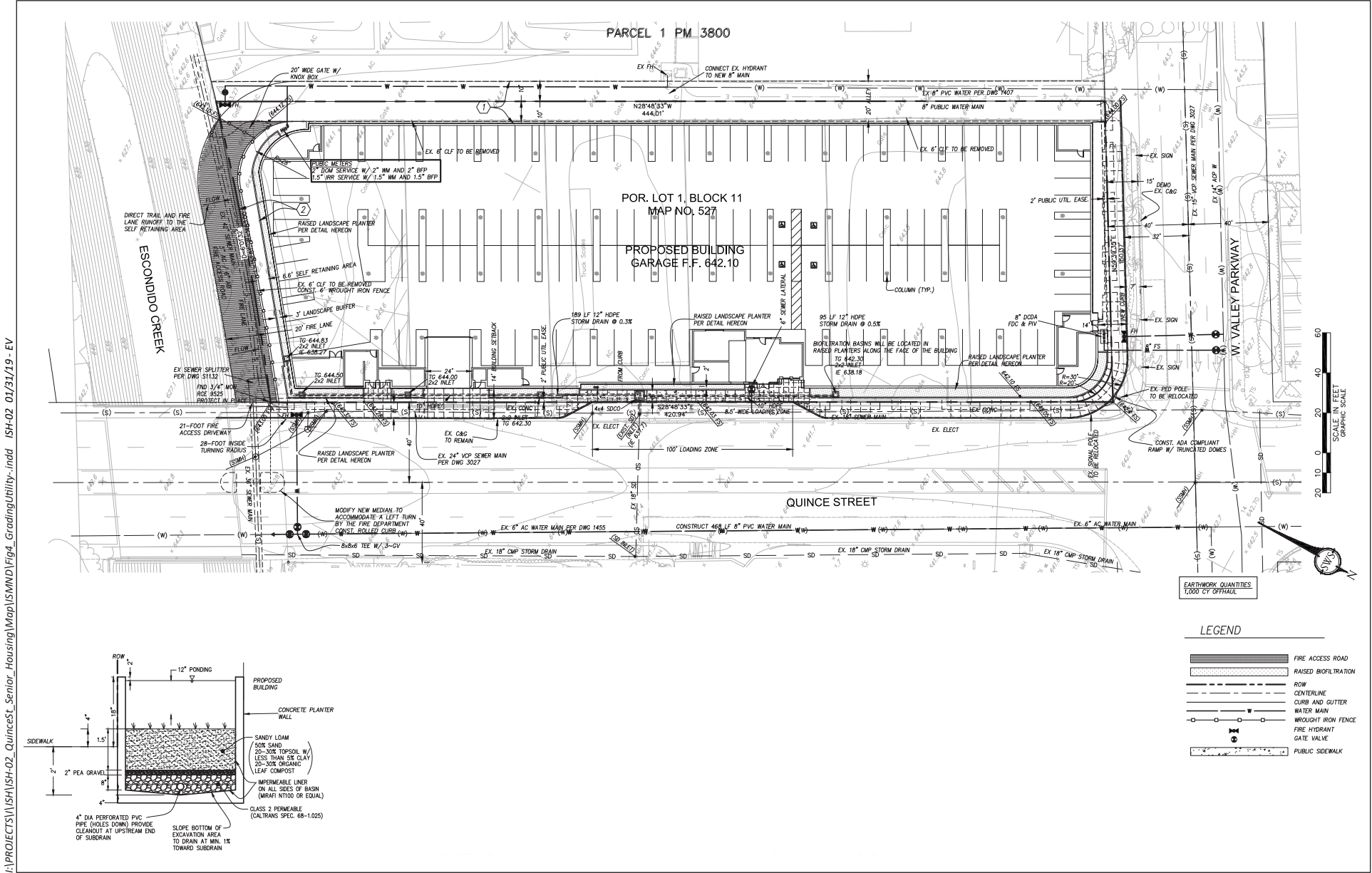
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Source: Rodriguez Associates Architects & Planners, Inc. 2019

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Source: Rodriguez Associates Architects & Planners, Inc. 2019



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Source: SWS Engineering Inc., 2019

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED


The environmental factors checked below potentially would be affected by this project involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages:

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

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there would 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/or deficiencies exist relative to the City's General Plan Quality of Life Standards, and the extent of the deficiency exceeds the levels identified in the City's Environmental Quality Regulations pursuant to Zoning Code Article 47, Section 33-924 (b), and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" 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.



6-3-19

Signature

Date

Adam Finestone, AICP

Principal Planner

Printed Name and Title

EVALUATION OF ENVIRONMENTAL IMPACTS

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
<ul style="list-style-type: none"> 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? 				
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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:				
<ul style="list-style-type: none"> 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 conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? 				
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:				
<ul style="list-style-type: none"> 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? 				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
<ul style="list-style-type: none"> 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 Wildlife 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 Wildlife 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 established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? 				
V. CULTURAL RESOURCES. Would the project:				
<ul style="list-style-type: none"> 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 dedicated cemeteries? 				
VI. ENERGY. Would the project:				
<ul style="list-style-type: none"> 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? 				
VII. GEOLOGY AND SOILS. Would the project:				
<ul style="list-style-type: none"> a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> 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? 				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
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 waste water disposal systems where sewers are not available for the disposal of waste water?				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

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 emissions of greenhouse gases?

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 § 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?

X. HYDROLOGY AND WATER QUALITY. Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- 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:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) result in a substantial erosion or siltation on- or off-site;				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
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?				

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?

XII. MINERAL RESOURCES. Would the project:

- a) Result in the loss of availability of a known mineral resource that would be a 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?

XIII. NOISE. Would the project result in:

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

XIV. POPULATION AND HOUSING. Would the project:

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

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:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?				
Police protection?				
Schools?				
Parks?				
Other public facilities?				

XVI. RECREATION.

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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 § 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?

XVIII. TRIBAL CULTURAL RESOURCES.

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul style="list-style-type: none"> 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 waste water 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? 				

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 to 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?

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

ISSUES DISCUSSION

I. Aesthetics

Would the project:

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

Less Than Significant Impact. The City of Escondido General Plan (General Plan) Resource Conservation Element (City 2012a), recognizes that views to and from hillsides and prominent ridgelines, unique landforms, and visual gateways are important visual resources for the community. According to Figure VII-5, Slopes and Ridgelines, of the General Plan Resource Conservation Element, prominent ridgelines and slopes surround the city, but the project site is not located within the immediate vicinity of notable ridgelines or a sensitive area regarding viewsheds. Public views from the project vicinity and surrounding roadways toward scenic ridgelines and hillsides are limited due to the existing built environment and distance to the nearest scenic vistas. The proposed project would not result in a substantial adverse effect on scenic vistas, and impacts would be less than significant.

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

No Impact. State scenic highways are those highways that are either eligible for designation or officially designated as State Scenic Highways by the California Department of Transportation (Caltrans). There are no officially designated or eligible state scenic highways within the vicinity of the project; the two closest eligible state scenic highways (not officially designated) are I-5, located approximately 12.5 miles west of the project site, and State Route (SR-) 76, located approximately 15 miles to the north. Additionally, the project would not damage scenic resources, as it would be constructed within a developed site that currently has no scenic resources. No impact to scenic resources would occur.

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

Less Than Significant Impact. The proposed project is located within the Gateway Transit District as designated in the Downtown Specific Plan. The site is zoned as S-P, Downtown Specific Plan – Gateway Transit District. The project would require a Specific Plan Amendment (SPA) to remove the requirement for ground-floor retail or office uses and to change the open space requirement for senior housing projects. Although the project would be taller than most structures in the area, it would be consistent with the Downtown Specific Plan building height limits for the Gateway Transit District (up to 75 feet and 5 stories). The net density of the proposed project is 98.6 dwelling units per acre, below the allowable 100 dwelling units per acre density for the project site. Additionally, the proposed building would add visual interest to the site through its architectural style, and the provision of new curbs, gutters, sidewalks, and street trees along the project's western and southern frontages of North Quince Street and West Valley Parkway, respectively. The proposed structure would not conflict with the applicable zoning or other regulations governing scenic quality, and impacts would be less than significant.

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

Less Than Significant Impact. The most prominent light sources from the proposed project would be interior lighting for the residential units and common areas, parking area lighting, and exterior and landscaping lighting. The project proposes color and material enhancements on all sides of the building, as well as a light feature on the building façade at the corner of West Valley Parkway and Quince Street. All new lighting would be compatible with existing lighting in the project vicinity and would comply with the Escondido Outdoor Lighting Ordinance (Escondido Municipal Code, Chapter 33, Article 35), which is intended to minimize glare, light, and artificial sky glow for the benefit of the community, as well as astronomical research at Palomar Observatory. Such measures include use of dark sky compliance certified lighting, shielded outdoor lighting fixtures, and automatic timing devices to turn lights off when not necessary. Based on these considerations, project lighting would not contribute to a substantial new source of light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

II. Agricultural and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department 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 or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to nonagricultural use?

No Impact. The California Department of Conservation's Farmland Mapping and Monitoring Program maps identify the project area as "Farmland of Local Importance" (CDC 2017). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs on site. The project site has been developed and used as a moving and storage facility since the 1960s and does not contain active agricultural uses or resources. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is not zoned for agricultural use and no Williamson Act Contract lands are located on or near the site. No impact would occur.

- 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))?

No Impact. The project site is currently developed and located in an urban industrial and commercial area. The project would not conflict with zoning for, or cause rezoning of, forest land or timberland or result in the conversion of forest land to non-forest use. No impact would occur.

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

No Impact. See Response II(c). No impact would occur.

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

No Impact. See Response II(a). No impact would occur.

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?

No Impact. The project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the Ambient Air Quality Standards (AAQS) in the SDAB. The SDAPCD has developed a series of policies and guidelines collectively known as the Regional Air Quality Strategy (RAQS). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards, including applicable portions of the California State Implementation Plan (SIP).

Included in the RAQS are short- and long-term goals for those pollutants that the SDAB is designated as a "nonattainment" area because the SDAPCD does not meet the NAAQS or CAAQS. Criteria pollutants of primary concern include ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter (including both respirable particulate matter 10 microns or less in diameter [PM₁₀] and fine particulate matter 2.5 microns or less in diameter [PM_{2.5}]), sulfur dioxide (SO₂), and lead. The SDAB is currently designated as a basic nonattainment area for the 8-hour NAAQS for ozone. The SDAB is designated as being in attainment for all other applicable criteria pollutants under the NAAQS. The SDAB is currently classified as a nonattainment area under the CAAQS for ozone, PM₁₀, and PM_{2.5}. It is in attainment for CO, NO₂, SO₂, and lead relative to state air standards.

The RAQS rely on SANDAG's growth projections, which are based in part on 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. In the event that a project proposes development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS.

The City of Escondido General Plan Final Environmental Impact Report ([FEIR] City 2012b) assessed whether development consistent with the General Plan would conflict with or obstruct implementation of the RAQS and SIP. The FEIR concluded that the overall increase in housing units and corresponding population increase associated with the General Plan would be consistent with the SANDAG growth projections identified for the City in the 2009 RAQS and concluded that development consistent with the General Plan would be consistent with the RAQS and SIP.

The project proposes a development intensity of 98.6 dwelling units per net acreage, which would comply with the property designation of 100 dwelling unit per acre established in the Gateway Transit District of the Downtown Specific Plan. As such, the proposed project would be in conformance with the General Plan and would therefore be consistent with the RAQS and applicable portion of the SIP. Therefore, the project would not conflict with implementation of applicable air quality plans and no impact would occur.

- 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. The screening thresholds for air quality impacts are established in the Escondido Municipal Code Chapter 33, Article 47, specifically Section 33-924(G) (City 2013). If a project proposes development in excess of the screening threshold, a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of potential impacts. A project that would not exceed the screening level criteria would have less than significant impacts related to air quality violations. Table 4.3-12 of the General Plan FEIR identifies the trigger level for apartment uses with a density of greater than 20 dwelling units/acre as 420 dwelling units (City 2012b). The project proposes a total of 145 units, and would be smaller than the significance threshold that would trigger the need for an air quality assessment. Nevertheless, anticipated project emissions were quantified to further demonstrate consistency with the City's Environmental Quality Regulations (EQR).

The project's criteria pollutant emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 (South Coast Air Quality Management District [SCAQMD] 2016). CalEEMod is a computer program developed by the SCAQMD that can be used to estimate anticipated emissions associated with land development projects in California. For this analysis, the results are expressed in pounds per day (lbs/day), and are compared with the mass daily emissions thresholds that were established by the APCD. The emission sources include construction (off-road vehicles and fugitive dust), mobile (on-road vehicles), area (consumer products and landscape maintenance equipment), and energy (on-site natural gas usage) sources. Consistent with the General Plan FEIR, emissions associated with the project were compared to the City's Daily Emissions Screening Level Criteria as contained within Article 47 of the Escondido Municipal Code (City 2013).

Construction Emissions

Construction activities associated with the project would generate short-term emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_x), CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}. Criteria pollutant emissions would be generated by stationary and mobile equipment, including off-road diesel equipment exhaust, employee and material delivery vehicle exhaust, re-entrained paved road dust, fugitive dust from land clearing/grading, and off-gassing from paving activities. Short-term air pollutant emissions would be generated during all phases of construction, including demolition, site preparation, grading, construction of the building and parking garage. Construction is expected to begin September 2018 and require approximately two years to complete. Construction activity is subject to the requirements established in Regulation 4, Rules 52, 54, 55, and 67, of the SDAPCD's rules and regulations.

Construction emissions calculated using CalEEMod Version 2016.3.1 are provided in Appendix A of the Greenhouse Gas Emissions Technical Report prepared for the project, included as Appendix A to this MND (HELIX Environmental Planning [HELIX] 2017a). The results of the calculations for project construction are shown in Table 1, *Estimated Maximum Daily Construction Emissions*. The modeling assumes that all construction equipment and vehicles would be required to be equipped with state-mandated emission control devices. The modeling also assumes that construction best management practices (BMPs) for dust control would be incorporated as a matter of project design and in accordance with the EQR.

Construction Activity	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	3	26	16	<0.5	2	2
Site Preparation	3	21	8	<0.5	4	2
Grading	2	17	7	<0.5	3	2
Underground Utilities	1	7	6	<0.5	<0.5	<0.5
Building Construction	3	19	18	<0.5	2	1
Paving	2	9	9	<0.5	1	<0.5
Architectural Coatings	15	2	3	<0.5	<0.5	<0.5
Maximum Daily Emissions	18	21	21	<0.5	2	1
EQR Screening Level Criteria	55	250	550	250	150	150

Source: CalEEMod (model output data is provided in Appendix A; HELIX 2017a); significance thresholds based on the Escondido Municipal Code (City 2013).

VOC = volatile organic gases; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = 10 microns or less particulate matter; PM_{2.5} = 2.5 microns or less particulate matter

As shown in Table 1, emissions of all criteria pollutants would be below the maximum daily thresholds during construction. Maximum daily emissions would occur when Building Construction and Architectural Coating Activities overlap. The project would be required to adhere to standard dust control procedures to reduce construction-related particulate emissions. Construction dust control measures would be included on all project construction contracts, grading permits, improvement plans, and final maps. During grading activities for development within the City's planning area boundary, the on-site construction superintendent is required to ensure implementation of standard BMPs to reduce the emissions of fugitive dust. Such measures may include:

- Water exposed soil areas a minimum of twice per day, or as allowed under imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, apply additional water at a frequency to be determined by the on-site construction superintendent.
- Operate all vehicles on the construction site at speeds less than 15 miles per hour (mph).
- Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer.
- If a street sweeper is used to remove track-out/carry-out soils, only PM₁₀-efficient street sweepers certified to meet the most current SCAQMD Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

The project would not violate federal or state air quality standards or contribute to an existing air quality violation in the SDAB. Short-term, temporary construction impacts would cease upon completion of construction, and impacts would be less than significant.

Long-term Operational Emissions

Long-term air quality impacts consist of mobile source emissions generated from project-related traffic and stationary source emissions. CalEEMod defaults for trip length, distribution, and purpose were utilized (refer to Appendix A to this MND). Average daily trips (ADT) were used from the *220 N. Quince Street Senior Housing Project Transportation Impact Analysis* (TIA; Linscott, Law & Greenspan, Engineers [LLG] 2017, as updated 2019). Operational area source emissions would result from on-site activities such as use of consumer products and landscaping maintenance activities. Operational energy source emissions would result from on-site electricity and natural gas usage.

The main operational emissions sources are associated with traffic and area sources such as consumer product use and landscaping. Table 2, *Estimated Maximum Daily Operational Emissions*, presents a summary of maximum daily operational emissions for the proposed project at full buildout, and compares these emissions with the City’s EQR screening level criteria.

Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	5	<0.5	12	<0.5	<0.5	<0.5
Energy	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Mobile	1	3	8	<0.5	2	0.5
Total Daily Emissions	6	4	20	<0.5	2	1
EQR Screening Level Criteria	55	55	550	250	150	150

Source: CalEEMod (model output data is provided in Appendix A; HELIX 2017a); significance thresholds based on the Escondido Municipal Code (City 2013).

VOC = volatile organic gases; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = 10 microns or less particulate matter; PM_{2.5} = 2.5 microns or less particulate matter

As shown in Table 2, operational emissions for the proposed project would be substantially below the significance threshold for all criteria pollutants. Therefore, operation of the project would not violate an air quality standard or result in a cumulatively considerable net increase of a criteria pollutant for which the region is in non-attainment. Impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive populations (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than are the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. Impacts to sensitive receptors are typically analyzed for operational CO hotspots and exposure to diesel particulate matter (DPM). An analysis of the project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hotspots

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at Level of Service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. According to the project TIA, intersections are calculated to continue to operate at acceptable LOS once the project is occupied (LLG 2017, as updated 2019). There would be no potential for a CO hotspot or exposure of sensitive receptors to substantial project-generated local CO emissions. Associated hotspot impacts would be less than significant.

Exposure to Diesel Particulates

Construction activities would result in short-term, project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment. The California Air Resources Board (CARB) identified DPM as a Toxic Air Contaminant (TAC) in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. Health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, are typically based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project.

Maximum daily particulate emissions, which include DPM, would be relatively low when compared to the SDAPCD Air Quality Impact Assessment Trigger Levels provided in Regulation II, Rule 20.2, Table 20-2-1. Additionally, the construction period would be relatively short (less than 2 years), especially when compared to 70 years. Combined with the highly dispersive properties of DPM, construction-related emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. Based on these considerations, the proposed project would not have the potential to expose sensitive receptors to TACs from mobile sources to an extent that health risks could result, and associated impacts would be less than significant.

As the proposed project would involve the development of senior residential uses, project operation would not introduce new stationary sources of TACs such as diesel-fueled backup generators that are more commonly associated with large commercial and industrial uses. In addition, the project is sited more than 3,000 feet away from the nearest freeway, well over the 500-foot threshold set by CARB to avoid exposure of residents to TACs. The project site is not located within buffer distances included in the General Plan FEIR that would require preparation of a Health Risk Assessment (HRA). Specific locations of facilities located within the City that could potentially result in substantial sources of TACs are listed in the General Plan FEIR as follows:

- Palomar Medical Center located at 2185 Citracado Parkway (approximately 1.8 miles northwest of project)
- Palomar Energy Center located at 1968 Don Lee Place (approximately 1.9 miles northwest of project)
- Goal Line Operations electronic power supply company located at 555 North Tulip Street (approximately 0.5 mile west of project site)
- Escondido Disposal, Inc. transfer station located at 1044 West Washington Avenue (approximately 1.9 miles northwest of project)

The only facility located within one mile of the project site is Goal Line Operations, a power supply facility that sells electricity to San Diego Gas & Electric Company (SDG&E) and thermal energy to the adjacent ICEOPLEX Ice Arena. An HRA prepared for the facility in 2003 determined that the facility would not exceed the standards for cancer or non-cancer risk as determined by the SDAPCD (City 2012); therefore, no potential impacts associated with TACs are expected to be experienced by the proposed project.

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

Less Than Significant Impact. Minor amounts of odor compounds associated with diesel heavy equipment exhaust and VOCs would be emitted during construction of the project. The odors of these emissions may be considered objectionable; however, emissions would disperse rapidly from the project site and therefore should not be at a level that would affect a substantial number of people. Further, the project is anticipated to be constructed within two years, and emissions of objectionable odors would be temporary. As a result, impacts associated with odors during construction would be less than significant.

Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The proposed senior housing project is not a use that would create objectional odors, nor would the project place residences within close proximity to the listed odor sources. Impacts associated with operational odor sources would be less than significant.

IV. Biological Resources

Would the project:

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

No Impact. The project site is completely developed and located in an urban industrial and commercial area of the City. Escondido Creek runs immediately to the north of the project site, but is channelized with concrete and is not regarded as significant biological habitat. Wildlife species with the potential to use the site are expected to be limited to common, non-sensitive species typical of urbanized areas. Also, there are no trees on site that could serve as nesting habitat for sensitive raptors protected under the Migratory Bird Treaty Act (MBTA) or California Fish and Game Code. No species identified as a candidate, sensitive, or special status species would be affected directly or through habitat modifications, and no impacts would occur.

- 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. According to the General Plan Resource Conservation Element Vegetation Categories Map (City 2012a), no riparian habitat or other sensitive natural community is located at or near the project site. The project site is completely developed and located in an urban industrial and commercial area of the City. Escondido Creek runs immediately to the north of the project site, but is channelized with concrete and is not regarded as riparian habitat. No impact to riparian habitat or other sensitive natural communities would occur.

- 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?

No Impact. According to the General Plan Resource Conservation Element Vegetation Categories Map (City 2012a), the project site is approximately one mile south of a disturbed wetland, which is part of a water channel that connects to Escondido Creek. The project site does not support wetlands, nor would the project propose activities that could result in substantially adverse effects on wetlands. No impact would occur.

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

No Impact. The construction and operation of the project would not impede the movement of fish or other wildlife species that could be present in Escondido Creek, since no direct or indirect impacts to Escondido Creek that could adversely affect wildlife movement would occur. Since the project site is located within an urbanized area, it is not considered a wildlife corridor. There are no trees on site that could serve as nesting habitat for migratory birds. No impact would occur.

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

No Impact. The Escondido Municipal Code Grading and Erosion Control Ordinance (Chapter 33, Article 55, Sections 33-1068 and 33-1069) places restrictions on the removal of vegetation, and includes vegetation and replacement standards for impacts to mature and/or protected trees. The project site is entirely developed, with only ornamental planter boxes located adjacent to the sidewalks along North Quince Street and West Valley Parkway. There are no trees or other sensitive vegetation on site that would be removed during demolition or grading activities. Therefore, no impact would occur.

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

No Impact. The project site is located within the boundaries of the Draft Escondido Multiple Habitat Conservation Program (Draft MHCP) Subarea Plan; however, this plan has not yet been approved or adopted. The project site occurs entirely within an urbanized area and is not located within any of the Focused Planning Areas or other areas of biological importance identified in the Draft MHCP. Therefore, the project would not conflict with a Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. Cultural Resources

Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (or conflict with applicable historic thresholds specified in City of Escondido Zoning Code Article 47)?

Less Than Significant Impact. Under the California Environmental Quality Act (CEQA), a resource is considered “historically significant” if it meets the criteria for listing on the California Register of Historical Resources (CRHR) (Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations [CCR] Section 4852) including the following:

- A. Is associated with events that have made a significant contribution to the broad pattern of California’s history and cultural heritage;
- B. Is associated with the lives of persons important in our past;
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- D. Has yielded or may be likely to yield information important in prehistory or history.

According to Section 15064.5 of the State CEQA Guidelines, a substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired.

The City policies regulating impacts to cultural resources are provided in the General Plan. Procedures and criteria for register listing or local landmark designation are provided in the Escondido Municipal Code, Article 40, Section 33-794.

The project proposes to demolish the existing intact warehouse complex, which has been used as a moving and storage facility since its construction on the project site in the 1960s. The structures do not meet significance criteria A, B, C, or D, as set forth by CEQA, or criteria for local register listing, as set forth by the City. Therefore, the existing structures are not considered as historically significant and impacts would be less than significant. A detailed analysis can be found in the Cultural Resources Study (HELIX 2019a) included as Appendix B to this MND.

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

Less Than Significant with Mitigation Incorporated. A HELIX archaeologist visited the project site on June 27, 2017 to assess the site for cultural resources. However, the property is entirely developed and no bare ground is visible or accessible. A record search revealed four archaeological sites within a one-mile radius of the project site, none of which are recorded within or adjacent to the site. Based on the absence of recorded resources within or adjacent to the project site, no adverse changes in the significance of an archaeological resource are anticipated; however, because of the overlaying pavement on site and alluvial soils beneath, it is possible that unrecognized archaeological resources may be discovered during grading and other ground-disturbing activities. Therefore, the following mitigation measures are required to ensure that impacts to unidentified cultural resources are less than significant.

CUL-1 The City of Escondido Planning Division (“City”) recommends the applicant 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”) prior to issuance of a grading permit. 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 them. 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 proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

CUL-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.

- CUL-3** The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.
- CUL-4** During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. 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. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.
- CUL-5** In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.
- CUL-6** If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.
- CUL-7** The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then 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. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. 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.
- CUL-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 they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an 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. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

CUL-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or 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 and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe 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.

CUL-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion 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 California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

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

Less Than Significant Impact. No cemeteries, formal or informal, have been identified or are known to be present on site or within the project vicinity; however, it is possible for human remains to be discovered during certain construction activities, such as grading. In the event that remains are identified on site, the project would proceed in accordance with the procedures of PRC Section 5097.98, California Government Code Section 27491, and Health and Safety Code Section 7050.5. These regulations detail specific procedures to follow in the event of a discovery of human remains. Mitigation measure **CUL-4**, above, requires that an archaeologist and Native American monitor(s) are on site to monitor all ground-disturbing activities to ensure that buried human remains uncovered during grading are identified and handled in compliance with these regulations. Health and Safety Code Section 7050.5 requires that no further disturbance occurs until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendant (MLD). The MLD may inspect the site of the discovery of the Native American

remains and may recommend means for treating, with appropriate dignity, the human remains and any associated grave goods. Compliance with these regulations would ensure that potential impacts to human remains would be less than significant.

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?

Less Than Significant Impact. Construction of the project is anticipated to last approximately two years. During construction of the project, temporary electric power for as-necessary lighting and electricity-powered tools would be provided by SDG&E. The electricity used for construction activities would be temporary and minimal and would have a negligible contribution to the project's overall energy consumption. Natural gas use may be consumed as a result of project construction; however, its use would be temporary and negligible. Fuels used for construction would primarily consist of diesel and gasoline. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction and would include the transportation of construction materials and construction worker commutes. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in the removal of construction and demolition materials, would consume petroleum-based fuel. Construction workers would travel to and from the project site throughout the duration of construction, presumably in gasoline-powered vehicles. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. However, the petroleum consumed during project construction would be typical of similar construction projects and would not require the use of new petroleum resources beyond what are typically consumed in California. Based on these considerations, construction of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Once the building is operational, electricity and natural gas would be required for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, and electronics. Project electricity and natural gas would be supplied by SDG&E. Solar panels are proposed to be installed to cover energy associated with common areas. The project has been designed to exceed the 2016 Title 24 Energy Code; the 2016 California Green Building Standards Code (CALGreen) by at least 15 percent and would involve the installation of Energy Star Appliances and efficient lighting to reduce on-site energy consumption. Implementation of the project would not result in a substantial increase in demand of local or regional energy supplies compared to existing conditions, and would not result in wasteful, inefficient, or unnecessary consumption of energy.

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by residents. It should be noted that over the lifetime of the project, the fuel efficiency of vehicles is expected to increase. As such, the amount of gasoline consumed as a result of vehicular trips to and from the project site during operation is expected to decrease over time. Additionally, due to the proximity of the Escondido Transit Center to the project site across the street, it is expected that residents and visitors of the proposed housing development may use transit or non-vehicular modes of transportation to travel to and from the project. When viewed on a regional scale, the proposed project is an

urban infill project that would generally involve fewer vehicle miles traveled compared with new development projects sited on previously undeveloped land and away from population centers. Based on these considerations, petroleum consumption associated with the proposed project would not be considered inefficient or wasteful, and impacts would be less than significant.

b. Conflict with or obstruct state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The project would be built and operated in accordance with all existing, applicable regulations. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for residential and non-residential buildings constructed in California in order to reduce energy demand and consumption. The project design would exceed the California code requirements for energy efficiency by 15 percent. Accordingly, the project would not conflict with existing energy standards or regulations, and impacts would be less than significant.

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.

Less Than Significant Impact. A Geotechnical Report was prepared by SCST, Inc. (SCST; 2017; Appendix C) to document geologic conditions for the project site. No active faults (i.e., faults that exhibit evidence of ground displacement during the last 11,000 years) are known to underlie the project site. The closest known active fault is within the Elsinore fault zone located approximately 15.7 miles northeast of the project site. The project site is not located in an Alquist-Priolo Earthquake Fault Zone. As such, the probability of fault rupture is low. In addition, all earthwork would be conducted in accordance with the City's Grading and Erosion Control Ordinance and the recommendations set forth in the Geotechnical Report. The proposed building would be designed in accordance with the 2016 California Building Code (CBC) seismic design parameters. Accordingly, the project would result in less than significant impacts related to the exposure of people or structures to geologic hazards associated with rupture of a known earthquake fault.

- ii. Strong seismic ground shaking?

Less Than Significant Impact. The Geotechnical Report prepared by SCST (2017) determined that ground shaking as a result of movement along an active fault in the vicinity of the project site has the potential to affect the project. However, construction of the proposed project would incorporate measures to accommodate projected seismic loading, pursuant to existing guidelines such as the International Building Code (IBC; International Code Council 2015) and CBC (CCR Title 24, Part 2). The CBC is based on the IBC, with appropriate amendments and modifications to reflect site-specific conditions in California. Based on the incorporation of

applicable measures into design and construction of the proposed project, the potential impacts associated with strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact with Mitigation Incorporated. Liquefaction is a process in which strong ground shaking causes soils in a saturated deposit to temporarily lose their strength and behave as a viscous fluid. Liquefiable soils typically consist of cohesionless sands and silts that are loose to medium dense and saturated. Ground failure associated with liquefaction can result in severe damage to structures. The geotechnical analysis performed by SCST (2017) determined that there is a potential for liquefaction to occur within the very loose to medium dense alluvial sands and silts underlying the project site. To mitigate the liquefaction hazard and the resulting settlements to acceptable levels, ground improvements consisting of rammed aggregate piers extending down to the underlying granodiorite mapped at between 15 and 25 feet below grade would be installed in order to provide support for the building. Once the ground improvements are installed and post-treatment verification that liquefaction potential has been reduced to acceptable levels has been completed, shallow spread footings with bottoms levels would be placed on the rammed aggregate piers to support the building.

Potential impacts related to liquefaction would be addressed through the recommendations of the Geotechnical Report (SCST 2017), outlined in mitigation measure GEO-1, below. Installation of the appropriate ground improvements and implementation of the applicable recommendations identified in the Geotechnical Investigation would reduce potential liquefaction impacts to less than significant.

GEO-1 Implementation of Geotechnical Recommendations. General and specific recommendations identified in Section 8.0 of the project Geotechnical Investigation prepared by SCST (2017) shall be implemented in the design and construction of the proposed project to address the presence of potentially compressible and potentially liquefiable soils. To mitigate the potentially compressible soils and reduce the potential for static settlement and distress to the planned building and improvements, remedial grading of the existing upper soil shall be performed. To mitigate the liquefaction hazard and the resulting settlements to acceptable levels, ground improvement consisting of rammed aggregate piers extending down to the underlying granodiorite shall be performed. A qualified geotechnical consultant shall observe the ground improvement operations and verify that hazards related to compressible soils and liquefaction have been mitigated to acceptable levels. All applicable recommendations, including those identified in the Geotechnical Investigation (SCST 2017) located in Appendix C to this MND, shall be included on the grading and site plans prepared for the project and shall be implemented during project design and construction. Project grading plans shall be reviewed by a qualified geotechnical consultant prior to final design submittal to determine if additional analysis and recommendations beyond those summarized above (and listed in full in the Geotechnical Investigation) are required. All geotechnical recommendations shall be fully implemented in accordance with applicable industry/regulatory standards (e.g., CBC requirements).

iv. Landslides?

No Impact. The project site and vicinity exhibit relatively flat topography; no steep slopes are located within or adjacent to the project site. Additionally, evidence of landslides and slope

instabilities was not observed by SCST, Inc. (2017) in an analysis of the project site. The potential for landslides or slope instabilities to occur at the site is considered low and no impact would occur.

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

Less Than Significant Impact. Erosion and sedimentation are not considered to be significant long-term concerns for the proposed project as developed areas would be stabilized through the installation of pavement, or groundcover in landscaped areas. Construction activities associated with grading or other ground disturbance could, however, result in temporary erosion or sedimentation during construction. Short-term, construction-related erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City storm water program and related NPDES standards. Specifically, this would entail implementing appropriate measures to comply with requirements of the following regulations: (1) Section 33 of Article 55 (Grading and Erosion Control) of the Escondido Municipal Code; (2) the City Jurisdictional Urban Runoff Management Plan (JURMP, 2008) and related storm water standards; and (3) the NPDES Construction General Permit (NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ, as amended).

Conformance with the noted NPDES and City standards is required prior to development of applicable sites exceeding one acre, and typically includes measures such as implementing an approved Storm Water Pollution Prevention Plan (SWPPP), an associated Construction Site Monitoring Program (CSMP), employee training, and minimum BMPs, as well as a Rain Event Action Plan (REAP) for applicable projects (i.e., those in Risk Categories 2 or 3 outlined below). Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., erosion potential and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the off-site discharge of pollutants (including sediment). Depending on the risk level, these may include mandatory technology-based action levels, effluent limitations, and advanced treatment systems (ATS). Specific pollution control measures require the use of best available technology (BAT) economically achievable and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through applicable BMPs. While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the Construction General Permit, as well as additional sources including the City of Escondido Standard Urban Storm Water Mitigation Plan (SUSMP; City 2011), and the California Storm Water Quality Association (CASQA) Storm Water Best Management Practices Handbooks (CASQA 2009). Specific requirements for the proposed project under this permit would be determined during SWPPP development, after completion of project plans and application submittal to the SWRCB.

Typical erosion and sediment control measures that may be required in the project SWPPP include the following: (1) seasonal grading restrictions during the rainy season (October 1 to April 30) for applicable areas; (2) preparation and implementation of a CSMP and, if applicable, a REAP to provide enhanced erosion and sediment control measures prior to predicted storm events; (3) use of erosion control/stabilizing measures such as geotextiles, mats, fiber rolls, or soil binders; (4) use of sediment controls to protect the site perimeter and prevent off-site sediment transport, including measures such as silt fencing, fiber rolls, gravel bags, temporary sediment basins, street sweeping, stabilized construction access points and sediment stockpiles, and use of properly fitted covers for sediment transport vehicles; (5) compliance with

local dust control measures, and (6) implementation of additional BMPs as necessary to ensure adequate erosion/sediment control and regulatory conformance.

Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, the project SWPPP and related City and NPDES requirements, associated potential erosion and sedimentation impacts would be avoided or reduced to a less than significant level.

- 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?

Less Than Significant Impact with Mitigation Incorporated. As discussed above in Response VII(a)iv., the project would not be subject to landslide-related risks, as the site and surrounding area are topographically level and no evidence of landslides or slope instabilities were observed within or adjacent to the project site. The site is, however, susceptible to liquefaction events, as discussed in Response VII(a)iii.

The project site is also susceptible to compressible soils, through the process of hydro-consolidation, because of the presence of fill and alluvial soils on site. Hydro-consolidation occurs when pore space between particle grains re-adjusts when inundated by groundwater, causing the material to consolidate. The proposed ground improvements included in the recommendations of the Geotechnical Investigation (SCST 2017) would be implemented as part of the project design and would effectively mitigate this hazard.

Potential impacts related to subsidence would be less than significant, based on the following considerations: (1) subsidence is typically associated with conditions such as groundwater (or other fluid) withdrawal, with such activities not proposed as part of the project and shallow groundwater was not observed or expected to occur on site; (2) while the noted effects can also be associated with loading related to placement of larger surface structures, the project site is underlain by dense alluvium and granodiorite, which are generally not subject to subsidence; and (3) potentially less stable materials present within the project area (fill and surficial alluvium) would be addressed through the required inclusion of geotechnical recommendations and conformance with applicable regulatory requirements. Such measures would include provisions related to the removal of unsuitable materials; composition and placement methodology (e.g., compaction) of materials used as backfill; and appropriate seismic, retaining wall, drainage, structure, foundation, and pavement design, pursuant to standards from regulatory/industry sources including the City and CBC. Conformance with the described geotechnical recommendations and regulatory/industry standards as a matter of project design would effectively avoid or reduce potential subsidence impacts below a level of significance.

As described in Response VII(a)iii, above, potential impacts related to unstable soils would be addressed through the recommendations of the Geotechnical Report (SCST 2017), outlined in mitigation measure **GEO-1**, above. Installation of the appropriate ground improvements and implementation of the applicable recommendations identified in the Geotechnical Investigation would reduce potential impacts related to unstable soils to less than significant.

- 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?

No Impact. Expansive (or shrink-swell) behavior in surface or near-surface materials is attributable to the water holding capacity of clay materials. Such behavior can adversely affect structural integrity through the shifting of foundations or supporting materials during the shrink-swell process. On-site soils were found to have a very low expansion potential based on soil testing conducted by SCST as a part of the Geotechnical Investigation (2017). No impacts related to risks to life or property as a result of expansive soil would occur.

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

No Impact. The proposed project would include connections to the existing municipal sewer system, and would not involve the use of septic tanks or alternative wastewater disposal systems. No related impacts would result from implementation of the project.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The project site is underlain by artificial fill, old alluvial flood-plain deposits, and granodiorite (SCST 2017). Artificial fill has no potential for paleontological resources and granodiorite is found at depths below 30 feet (SCST 2017) and would not be affected by development of the project. Old alluvial deposits have a moderate potential for paleontological resources (General Plan FEIR), as fossils have been collected from Pleistocene-age alluvial deposits in various locations around the County from sediments unearthed during construction-related activities. As such, construction of the proposed project would have the potential to directly or indirectly destroy a unique paleontological resource. There are existing regulations and General Plan goals and policies in place to protect unique paleontological resources, including PRC Section 5097, the County Grading Ordinance, the Escondido Municipal Code Grading and Erosion Control Ordinance, and Goal 5 of the General Plan Resource Conservation Element. Compliance and implementation of these regulations and policies allow impacts to paleontological resources to be less than significant.

Unique geological features generally are defined to include geologic structures, formations, or other features that exhibit unusual or important characteristics in the context of scientific information (e.g., rare geologic/mineral assemblages or structural features), economic considerations (e.g., economically valuable mineral deposits), or cultural perception (e.g., prominent, unusual, and/or aesthetically pleasing rock outcrops or exposures). Because the project site is generally level and does not encompass any distinct or unique geologic characteristics, information or features as described, no associated impacts would result from proposed development.

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 (or conflict with applicable greenhouse gas emissions thresholds specified in City of Escondido Zoning Code Article 47)?

Less Than Significant Impact. A project-specific Greenhouse Gas Emissions Technical Report was prepared by HELIX (2017a) and is included as Appendix A to this MND. GHGs are emitted by natural processes and human activities primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. Emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the greenhouse effect and contributing to what is termed “global warming,” the trend of warming of the Earth’s climate from anthropogenic activities. Global climate change impacts are by nature cumulative; direct impacts cannot be evaluated because the impacts themselves are global rather than localized impacts.

The GHGs defined under California’s AB 32 include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). As individual GHGs have varying heat-trapping properties and atmospheric lifetimes, GHG emissions are converted to carbon dioxide equivalent (CO₂e) units for comparison. The CO₂e is a consistent methodology for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure.

The City of Escondido Climate Action Plan (E-CAP) was adopted in December 2013 (City 2013a). A lead agency may conclude that a project’s GHG impact is not cumulatively significant if the project demonstrates consistency with the E-CAP, which is a qualified GHG reduction plan under CEQA (CEQA Guidelines Section 15183.5[h][3]). Following the state’s adopted AB 32 GHG reduction target, the City has set a goal to reduce GHG emissions back to 1990 levels by the year 2020. The estimated community-wide emissions for the year 2020, based on population and housing growth projections associated with the assumptions used in the proposed General Plan Update, are 992,583 metric tons (MT) of CO₂e. To reach the reduction target, the City must offset this growth in emissions and reduce community-wide emissions to 788,176 MT CO₂e by the year 2020. To reach the reduction target, the City of Escondido has included additional local reduction measures in the CAP which encourage energy efficiency and renewable energy in buildings, transit-oriented planning, water conservation, and increased waste diversion. For development projects, the E-CAP established a 2,500 MT CO₂e per year screening level threshold to determine whether projects would potentially result in a significant impact related to GHG emissions. City guidance also recommends including construction emissions (amortized over a typical duration of 30 years) in the comparison to the screening threshold. Annual project CO₂e emissions less than the threshold would be considered to have less than significant impact.

The project would result in emissions of GHGs during construction and operation. Construction sources of GHG emissions include heavy construction equipment, worker vehicle miles traveled (VMT), and water use. The project’s construction GHG emissions were estimated using the same assumptions and methods as the air quality analysis (using CalEEMod Version 2016.3.1) and are shown in Table 3, *Estimated Project-related GHG Emissions*. Construction activities would include demolition, site preparation, grading, underground utility installation, building

construction, paving, and architectural coating. As shown in Table 3, the total GHG emissions that are anticipated from construction of the proposed project would be approximately 764 MT CO₂e. Amortized over an estimated 30-year project lifetime, construction emissions would be approximately 25 MT CO₂e per year.

Emission Sources	Emissions (MT CO₂e)
Construction	
Total	764
<i>Construction (amortized over 30 years)</i>	25
Operations	
Area Sources	2
Energy Sources	356
Mobile Sources	379
Waste Sources	9
Water Sources	61
<i>Operational Subtotal</i>	807
Total Annual Project Emissions	832
City Screening Threshold	2,500
Significant Impact?	No

Source: CalEEMod (model output data is provided in Appendix A; HELIX 2017a); significance thresholds based on the Escondido Municipal Code (City 2013).

Note: Totals may not add up exactly due to rounding.

During operations, area and indirect emissions sources associated with the proposed project would primarily result from electricity and natural gas consumption, water and wastewater transport, and solid waste generation. GHG emissions from electricity consumed on site by the proposed project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport are also indirect emissions resulting from the energy required to transport water from its source, and the energy required to treat wastewater and transport it to its treated discharge point. In addition, the residential uses at the project site would also generate mobile source emissions from motor vehicle trips generated by residents and visitors. The various operational GHG emissions associated with the proposed project are shown in Table 3. Overall, the proposed project's total annual GHG emissions resulting from construction and operational activities would be 832 MT CO₂e per year.

As shown in Table 3, the project's construction and operational GHG emissions would not exceed the City's threshold of 2,500 MT CO₂e per year. Thus, the proposed project would not result in the generation of substantial levels of GHG emissions and would not result in emissions that would adversely affect the statewide attainment of GHG emission reduction goals of AB 32. Moreover, the project would be required to comply with the 2016 Title 24 Energy Code; the 2016 California Green Building Standards Code (CALGreen); the AB 341 solid waste diversion target of 75 percent; reduction of potable water use by 20 percent when compared to the statewide average; low-flow water and bathroom fixtures; reduction of wastewater generation by 20 percent; weather-based irrigation systems; provide areas for storage and collection of recyclables and yard waste to reduce generation of GHG emissions. Impacts would be less than significant.

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

No Impact. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the project's operational year in 2022, the project aims to reach the quantitative goals set by AB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard (LCFS), and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project does not conflict with those plans and regulations.

Because development of the proposed project would be consistent with the land use designation for the project site identified in the General Plan Land Use and Community Form Element that allows for residential and commercial development, the GHG emissions associated with the project would have already been accounted for in the City's future emissions forecast. As such, implementation of the proposed project would be consistent with the E-CAP. As discussed above, the GHG emissions generated by the proposed project would not exceed the City's 2,500 MT CO₂e per year screening threshold. As the threshold has been developed as part of the E-CAP development review process, the project would not interfere with implementation of the E-CAP. Consequently, the implementation of the project would not hinder the ability of the State to achieve AB 32's goal of achieving 1990 levels of GHG emissions by 2020. In addition, once the energy and water consumption reductions from compliance with the mandatory requirements of CALGreen are accounted for, the GHG emissions associated with the proposed project would be even lower. Implementation of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and no impact would occur.

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?

Less Than Significant Impact. The proposed project entails development of a residential site, and would generally not involve the transport, use, release, or disposal of hazardous materials. Long-term project operations would potentially involve the use of chemical pesticides in certain instances (e.g., landscape maintenance), although the project includes measures to minimize and control such use, as outlined below in Section X.

Project construction and demolition would involve the on-site use and storage of hazardous materials such as vehicle/equipment fuels, oils, and lubricants; paints; and solvents. Applicable regulatory requirements associated with the routine transport, use, and/or disposal of hazardous materials during construction- and demolition-related activities would be met through implementation of a SWPPP and related BMPs as described below in Section X. Although no hazardous materials such as asbestos or lead-based paint are known to occur on site, there is the potential for these hazardous materials to be identified during demolition of the existing structures. As required by the Development Standards of the Escondido Municipal Code

(Section 33-694(d)(4)), a protocol for the handling of hazardous waste (e.g., oil, batteries, solvents, asbestos, and lead-based products) would be prepared to detail the procedures for the screening and exclusion, identification, segregation, handling, storage, personnel training, emergency procedures, and disposal of any hazardous waste. An inspection for asbestos and lead-based paint would be conducted prior to demolition of the existing on-site structures; should asbestos and/or lead-based paint be discovered, remediation would be conducted pursuant to the applicable local, state, and federal regulatory requirements. Therefore, impacts would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. Residual impact from diesel fuel, gasoline, and waste oil were detected in soil on the site during the Phase I Environmental Site Assessment (ESA) conducted in 2015 by Marc Boogay Consulting Engineer (MBCE). The Phase I ESA is included as Appendix D to this MND. The steel building used for automotive repair and maintenance and two previously removed underground fuel and waste oil storage tanks are the most probable sources of this residual impact in the soil. Soil vapor sampling identified two chemicals relating to automotive service and fuel, perchloroethylene (PCE) and benzene. Considering the known site history, it is likely that solvents (e.g., PCE) and/or minor/occasional fuel spillage residues accumulated only in the top several feet of soil beneath the sampled areas. During redevelopment of the site, it is possible that excavation and grading activities could expose these substances found in the soil underlying the site. Backfill activities would most likely mix the contaminated soil found in the first few feet underground with deeper, uncontaminated soil to non-detectable levels. Additionally, paving over the area would decrease risk for human exposure below thresholds of concern. However, because of the possibility of the release of adverse soil vapors during grading, mitigation measure **HAZ-1** would be required to ensure that potential impacts related to the release of hazardous materials would be less than significant.

HAZ-1 Soils Testing. Testing for soil contamination shall be conducted by an individual licensed in the State of California to assess soil conditions for the potential presence of contaminated soils following the completion of grading activities, but prior to construction of on-site structures. Soil sampling shall be performed in areas deemed most likely to have had residual impact from previously released diesel fuel, gasoline, or waste oil associated with the historical recognized environmental condition at the property. In the event that contaminated soils are encountered, these soils shall be properly tested, managed, and disposed of at a licensed facility in accordance with the County Department of Environmental Health requirements.

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

Less Than Significant Impact with Mitigation Incorporated. Diego Valley Charter School – Escondido is located within one-quarter mile of the project site. Because of the risk of soil vapor emission from residual impact from diesel fuel, gasoline, and waste oil in the soil, as discussed in Response IX(b), impacts would be potentially significant. Implementation of mitigation measure **HAZ-1**, which requires soils testing to ensure that impacts related to the release of soil vapors would be mitigated, would ensure that potential impacts related to the release of hazardous materials within one-quarter mile of a school would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. The Phase I ESA included a computerized, environmental information database search performed by Environmental Data Resources, Inc. (EDR) on October 8, 2016. Searches of the project area and surrounding vicinity were performed through federal, state, and locally listed sites identifying the location and type of known hazardous materials. The review was conducted to evaluate whether the site or properties within the site vicinity have been documented as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects. The project site was identified on the following listings: San Diego County Hazardous Materials Management Division under the name Pack & Crate Service, Inc.; Statewide Environmental Evaluation and Planning System (SWEEPS) underground storage tank (UST) entry under the name ACE Storage Company; Hazardous Substance Storage Container Database (HIST) UST entry under the name Escondido STG Co; and California Department of Toxic Waste Substances HAZNET database under the name Pack and Crate Services. All four of the listings from past uses of the project site were related to diesel fuel, gasoline, oil wastes, or other vehicle maintenance substances. Implementation of mitigation measure **HAZ-1** would ensure that potential impacts related to the release of hazardous materials associated with the previous uses would be less than significant.

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

No Impact. As noted in the General Plan FEIR, the two nearest public airports to the City are the McClellan-Palomar Airport and Ramona Airport, both located approximately 11 miles from the project site. Additionally, portions of the City are subject to periodic flyovers from Marine Corps Air Station (MCAS) Miramar. However, the entire City is outside of the 60 community equivalent noise level (CNEL) noise contours for these airports. Therefore, the project would not expose people residing or working in the project area to safety hazards or excessive noise levels associated with public airports. No impact would occur.

- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Pertinent information regarding emergency response in the project site vicinity is provided in the County of San Diego General Plan (2011) and related documents, and in the General Plan Community Protection Element (2012a). The County General Plan includes information on emergency evacuation in the Mobility and Safety elements, with reference to the Office of Emergency Services *Unified San Diego County Emergency Services Organization Operational Area Emergency Plan* (County 2010). Specifically, Annex Q (Evacuation) of the plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County..." with I-15 and SR-78 identified in the project site vicinity. The County plan also notes that "Local jurisdictions will work with...applicable agencies/departments to identify evacuation points and transportation routes."

The City General Plan Community Protection Element identifies information related to emergency response in association with vehicular and aircraft (helicopter) access for police, fire

and ambulance/Emergency Medical Technician (EMT) services, with no specific “emergency response or evacuation plans” included (City 2012a). In addition, the Community Protection Element includes policies related to emergency response for the noted services, including provision of adequate staffing, equipment and response times, and also identifies a number of designated emergency evacuation routes “...to aid in the orderly and rapid movement of people away from a threat or actual occurrence of a hazard.” Several of these designated routes are in the vicinity of the proposed project, and may be utilized by project-related traffic, including I-15, West Valley Parkway, and Center City Parkway.

From the above information and the proposed project design, potential impacts to emergency response or evacuation plans would be less than significant, based on the following considerations: (1) as described below in Section XVII, operational project traffic would not result in significant impacts to local roadways or intersections, with no associated effects to emergency response or evacuation plans; (2) project construction would not involve off-site roadway (or other applicable) improvements that would result in associated roadway/lane closures or related impacts to emergency response or evacuation plans; (3) indirect effects to regional and local roadways (including I-15 and the designated emergency evacuation routes noted above) from project-related construction traffic would be minor, due to the low ADT levels anticipated for this type of residential project and the temporary nature of project construction; and (4) primary access to all major roadways from local properties would be maintained during construction and operation activities. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site is located in an urbanized area, surrounded by commercial and industrial land uses. According to the General Plan Community Protection Element, the project site and surrounding area are located in a moderate fire hazard zone. Conformance with current fire and building codes would ensure that long term-operational fire hazards would be less than significant.

The construction phase of the project could potentially increase the risk of fires on a short-term basis, if, for example, equipment-related fires were accidentally started at the site. The probability for such fires to occur is low, however, and construction equipment would be outfitted with spark arrestors and other fire protection features such as on-board fire extinguishers. As a result, potential impacts associated with short-term fire hazards from project construction would be less than significant.

X. Hydrology and Water Quality

Would the project:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A Drainage Study and a Preliminary Storm Water Quality Management Program (SWQMP) have been prepared for the proposed project by SWS Engineering, Inc. (SWS; 2018 and 2019, respectively). These documents are summarized below along with other applicable data, and the complete technical reports are included in Appendices E and F, respectively. As outlined in the following analysis, potential project-related water quality impacts are associated with both short-term construction activities and long-term

operation and maintenance. Construction and operation of the project would potentially result in the release of sediments, nutrients, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, pesticides, and heavy metals into runoff from the project site. The short- and long-term discharge of pollutants from the project site could potentially result in significant water quality impacts to downstream receiving waters, including Escondido Creek. The project site currently drains east to west; surface drainage leaves the site onto Quince Street and enters into the City-maintained storm drain system through an inlet located near the middle of the site.

To address potential water quality impacts, the project would comply with NPDES Municipal Separate Storm Sewer Systems (MS4) permit requirements to develop a SWQMP which would outline construction and permanent BMPs to be implemented, pursuant to the Escondido Storm Water Design Manual (City 2016). The project would employ source control, low-impact development (LID), and treatment control BMPs. Source control BMPs are site planning practices or structures that aim to prevent urban runoff pollution by reducing the potential for contamination at the source. All development projects within the city must implement source control BMPs 4.2.1 through 4.2.6 of the Escondido Storm Water Design Manual, where applicable and feasible. Source control BMPs would be designed to prevent illicit discharges and potential sources of runoff pollutants and would include posting storm water information and signage for construction personnel and protecting outdoor materials and trash storage areas from rainfall, runoff, and wind dispersal. Specific BMPs would be identified during preparation of the project's final SWQMP. Construction storm water BMPs are required to be shown on the project grading plan and would be provided in the SWPPP for the project.

LID BMPs are storm water management and land development strategies that emphasize conservation and the use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely reflect pre-development hydrologic conditions. LID BMPs include optimizing the site layout, minimizing the impervious footprint, dispersing runoff to adjacent landscaping, and draining impervious surfaces to bioretention facilities, planter boxes, cisterns, or dry wells.

Structural treatment BMPs are designed to infiltrate, filter, and/or treat runoff from the project footprint. Bioretention facilities, self-retaining and self-treated landscaping areas, and pervious pavement would be employed for the project. The project would construct a series of biofiltration basins both on the podium structure and within the parking garage to provide for the storm water treatment requirements.

Implementation of these BMPs, along with regulatory compliance, would preclude violations of applicable standards and discharge regulations. Project impacts related to water quality would be less than significant.

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

Less Than Significant Impact. The project site is completely developed and paved. Although the proposed project would include landscaping and other areas of pervious surfaces to capture rainwater, a substantial change in the rate of groundwater recharge is not expected compared to existing conditions. As noted in the project-specific Geotechnical Investigation (SCST 2017), groundwater was encountered at depths between 14 and 18.5 feet below the existing ground surface. Shallow groundwater could potentially be encountered during remedial excavation and

installation of the foundation/footings. Potential dewatering activities associated with construction would be short-term in nature, and would not substantially affect the groundwater table. Based on the described conditions, implementation of the project would result in less than significant impacts related to groundwater supplies or recharge.

- 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;

Less Than Significant Impact. The project site currently has an east to west drainage pattern. Surface drainage flows from the site onto North Quince Street and into the City-maintained storm drain system through an inlet located near the middle of the site. According to the Drainage Study prepared for the project (SWS 2018; Appendix E), the proposed project would not alter the existing drainage pattern of the site. Runoff would be minimized to the extent practicable through on-site biofiltration basins and landscaped areas that would be designed to filter pollutants and decrease flow velocity before the runoff leaves the site. Implementation of the project would reduce the peak runoff flow rate for a 100-year storm event from 10.9 cubic feet per second (cfs) to 9.6 cfs, a nine percent reduction from existing conditions. As described in Response X(b), construction and operational BMPs would be implemented in compliance with applicable stormwater regulations to reduce potential water quality impacts, including those associated with increased erosion and siltation. As a result, impacts would be less than significant.

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

No Impact. Refer to Response X(c)(i). The proposed project would not alter the existing drainage of the site. The use of biofiltration basins and landscaped areas throughout the site would decrease surface runoff velocities, reducing the chances of flooding on- or off-site. No impact would occur.

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

No Impact. Refer to Responses X(a) through X(c)(i-ii). Runoff from the site would be reduced with the development of the proposed project. Runoff would not exceed the capacity of the existing storm water drainage system or provide additional sources of polluted runoff. No impact would occur.

- iv) Impede or redirect flood flows?

Less Than Significant Impact. Lake Wohlford and Lake Dixon are located approximately 6 miles and 3.5 miles, respectively, northeast of the project site. If either dam were to fail, portions of Escondido Creek, which runs to the north of the project site, would experience substantial flooding. These dams, however, are highly regulated and inspected regularly, and are identified as having a low failure risk by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan (County 2010). The project would be consistent with the General Plan, which zones the project area for residential development, and would implement the Lake Dixon and

Lake Wohlford Dam Emergency Action Plans should a dam failure occur. The project would not impede or redirect flood flows, and impacts would be less than significant.

- d. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A seiche, defined as a standing wave in an enclosed body of water, has the potential to occur at Lake Wohlford or Lake Dixon. Areas surrounding the shoreline of the two lakes would be at risk from inundation by seiche. Because the project site is located over three miles from either lake, it is not at substantial risk of inundation or risk of release of pollutants.

The project site is located approximately 13 miles inland from the Pacific Ocean. Due to this distance, the proposed project would not be at risk of inundation from a tsunami.

No impacts related to release of pollutants as a result of inundation by flood waters, seiche, or tsunami would occur.

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

Less Than Significant Impact. Refer to Responses X(a) through X(d). The project would comply with all storm water quality standards during construction and operation, and appropriate BMPs would be implemented to address potential water quality impacts and reduce them to less than significant.

XI. Land Use and Planning

Would the project:

- a. Physically divide an established community?

No Impact. The project proposes the development of 145 dwelling units within an established community consisting primarily of commercial and industrial uses. The project would not prohibit access to, or otherwise physically divide, an established community. No associated impacts would occur.

- 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?

No Impact. The proposed project is located within the Gateway Transit District as designated in the Downtown Specific Plan. Residential development is permitted in this area; however, retail or office uses are required on the ground floor. The project proposes a SPA in order to develop residential units on levels two through five of the building, with parking and the lobby on the ground floor. Additionally, this site is permitted to have a maximum of 100 dwelling units per acre. The density of the proposed project is 98.6 dwelling units per acre, below the allowable density for the project site.

As described in Response IV(f), the proposed project is located in an urban commercial and industrial area and is not located within any of the Focused Planning Areas or other areas of biological importance identified in the City's Draft MHCP. As such, the project would not conflict

with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and no impact would occur.

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?

No Impact. According to Figure 4-11-1 of the General Plan FEIR, no existing or past mineral extraction facilities are located on the project site (City 2012b). The site has not been associated with mineral mining or excavation and is located in an urbanized area of the City where mineral extraction is not feasible. Therefore, no impacts to the loss of a known mineral resource or locally-important mineral resource recovery site would occur.

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

No Impact. Refer to Response XII(a).

XIII. Noise

Would the project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (or conflict with applicable noise thresholds specified in City of Escondido Zoning Code Article 47)?

Less Than Significant Impact with Mitigation Incorporated. An Acoustical Analysis Report was prepared for the project by HELIX (2017b); this document is summarized in the following analysis and included as Appendix G to this MND. The acoustical analysis was conducted to assess potential construction and operational noise impacts associated with the proposed project.

Construction Noise Sources

Construction-noise impacts from the project would include noise generated from equipment involved with demolition and excavation. Construction activities would comply with Section 17-234 and 17-238 of the Escondido Municipal Code, which prohibits construction on Sundays and holidays and allows construction between 7:00 AM and 6:00 PM on weekdays and between 8:00 AM and 5:00 PM on Saturdays. The code also prohibits construction noise levels in excess of a 75 decibels (dB) one-hour average sound level ($L_{EQ}[1 \text{ hour}]$).

Project construction noise was analyzed using the Roadway Construction Noise Model (RCNM; USDOT 2008), which utilizes estimates of sound levels from standard construction equipment. Equipment used during demolition would include a dozer or a medium-sized excavator and a front-end loader. Following demolition, the site would be excavated to the subgrade level for the foundation using a medium size excavator and a loader. For modeling purposes, these pieces of equipment were assumed to operate at 75 feet from the nearest adjacent property line (the

commercial offices at 520 West Valley Parkway). RCNM lists a loader as generating 75 A-weighted decibels (dBA) at 50 feet. RCNM does not list the noise level of a medium size excavator; therefore, a typical value of 78 dBA at 50 feet was used for modeling. These pieces of equipment were assumed to operate for 40 percent of a typical construction hour. For an excavator and a loader at 75 feet, this would equate to a 74 dBA L_{EQ} noise level (refer to the Construction Noise Model Outputs provided in Appendix B of the Acoustical Analysis Report). Given that construction noise levels from demolition and excavation would not exceed the City's noise limit of 75 dBA L_{EQ} (1 hour), impacts from construction noise would be less than significant.

Operational Noise Sources

The primary project operational noise sources that would result in a permanent increase in ambient noise levels in the vicinity of the project include the heating, ventilation, and air conditioning (HVAC) equipment located on the rooftop and vehicular traffic. The HVAC equipment would involve the use of a rooftop water cooling tower or similar rooftop-mounted cooling systems. A five-foot parapet barrier would be installed around the outer rooftop edge to visually shield the HVAC equipment from typical ground level views in the surrounding area. The proposed project design for the HVAC units would result in noise levels from a single cooling tower below 45 dBA L_{EQ} , which is below the City noise limits for noise from multi-family residential uses (55 dBA L_{EQ} from 7:00 AM to 10:00 PM and 50 dBA L_{EQ} from 10:00 PM to 7:00 AM). As a result, impacts related to permanent increases in ambient noise levels resulting from the proposed HVAC equipment would be less than significant.

Project-generated traffic may increase ambient noise levels on adjacent roadways. A significant noise increase is considered to be an increase greater than 3 dBA CNEL, which would occur with a doubling of traffic volumes. Using the traffic volumes provided in the project TIA, the project would result in an increase of traffic on North Quince Street by approximately six percent and on West Valley Parkway by approximately three percent (LLG 2017, as updated 2019). These increases in traffic would generate less than a 1 dBA CNEL increase in noise levels. Therefore, impacts to ambient noise levels from project-generated traffic would be less than significant.

The anticipated primary project operational noise sources include vehicular traffic and HVAC systems. As stated in the General Plan Community Protection Element, the noise level goal for multi-family residential uses is 65 CNEL at exterior use areas. In addition, Title 24 of the California Code of Regulations establishes an interior noise standard of 45 CNEL. Potential impacts from operational sources relative to these standards are discussed below.

Transportation Noise

Exterior Noise Levels. A significant direct impact would occur from project-generated traffic if buildings where people normally sleep, and institutional land uses with primarily daytime and evening uses are exposed to noise level increases in excess of the incremental noise standards in Figure VI-14 of the General Plan Community Protection Element (City 2012a). The Acoustical Analysis Report analyzed future traffic noise impacts to the project's on-site uses based on the forecasted (Near-term Plus Project) traffic volumes for North Quince Street and West Valley Parkway provided in the project TIA (LLG 2017, as updated 2019) and the forecasted (2035) traffic volumes for Centre City Parkway provided by the SANDAG Series 13 Traffic Volume Forecasts. Noise levels include the modeled transportation noise levels, plus 3 dBA to account for the nearby transportation center noise and other background noise.

The project does not propose ground level exterior or interior residential use areas; all exterior residential uses, the project's courtyards, start at the podium level (first floor over ground level parking). The Acoustical Analysis Report calculated a maximum of 51.6 CNEL for the exterior use areas (courtyard) resulting from traffic noise, which would be below the City's Community Protection Element exterior 65 CNEL limit for multi-family residential. Therefore, impacts from off-site transportation noise would be less than significant.

Interior Noise Levels. Traditional architectural materials are expected to attenuate noise levels by 15 CNEL. If noise levels exceed 60 CNEL, interior noise levels may exceed the Title 24 interior noise standard of 45 CNEL. The Acoustical Analysis Report determined that building façade noise levels would exceed 60 CNEL for all of the residential areas with a view (including partial) of North Quince Street or West Valley Parkway. Therefore, interior noise levels are likely to exceed the Title 24 interior noise standard of 45 CNEL, resulting in a potentially significant impact. Mitigation Measure **NOI-1** would be implemented to ensure that potential interior noise levels would be compatible with the General Plan Community Protection Element and Title 24 standards, and impacts would be less than significant.

NOI-1 Interior Noise Reduction. For the project's habitable areas (both living rooms and bedrooms) with a view (including partial) of North Quince Street or West Valley Parkway, which are likely to exceed an interior noise level of 45 CNEL, the following measures shall be incorporated to provide the required noise control to ensure that noise levels at interior habitable areas are 45 CNEL or less:

- Exterior wall requirement of standard 0.875-inch stucco over 0.5-inch shearwall on 2x6 studs with 0.625-inch Type "X" Drywall.
- Minimum window requirement of STC 28.
- Window construction of dual glazing window thickness 0.125-inch and 0.5-inch air gap.
- Appropriate means of air circulation and provision of fresh air must be present to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior.
- The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2013 CBC) to ensure that windows would be able to remain permanently closed.

Heating, Ventilation, and Air Conditioning Systems

Stationary operational noise sources are regulated by the limits within City Municipal Code Section 17-229, which states that noise from multi-family residential uses shall not exceed 55 dBA L_{EQ} from 7:00 AM to 10:00 PM and 50 dBA L_{EQ} from 10:00 PM to 7:00 AM. The project would likely use a rooftop water cooling tower or similar rooftop mounted cooling systems. With a cooling tower mounted within the rooftop area, and a five-foot parapet barrier around the outer rooftop edge shielding the equipment from normal ground level off-site views, the predicted noise impact from a single cooling tower would be below 45 dBA L_{EQ} . This would be less than the applicable City noise limits identified above for a multi-family residential zone. Therefore, impacts related to permanent increases in ambient noise levels resulting from the on-site HVAC unit would be less than significant.

- b. Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The primary potential for generation of groundborne vibration would occur during project construction. Per Federal Transit Administration vibration levels provided in the General Plan FEIR, an impact would occur if construction would generate vibration levels greater than 65 vibration decibels (VdB) at buildings where vibration could interfere with interior operations, 80 VdB at the nearest residence or building where people sleep, or 83 VdB at the nearest institutional land use with primarily daytime uses. No uses such as medical offices, research and development facilities, or industrial land uses where vibration could interfere with interior operations are located in proximity to the project. The nearest building where people sleep is Fire Station No. 1, located approximately 100 feet north of the property boundary.

A vibratory roller would be expected to create the highest vibration levels during fill compaction. Table 4.12-9 of the City General Plan FEIR provides vibration source levels for common construction equipment, which lists a vibratory roller as generating approximately 76 VdB at 100 feet, which would be below the 80 VdB threshold. Therefore, construction vibration impacts would be less than significant.

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

No Impact. As noted in the General Plan FEIR, the two nearest public airports to the City are the McClellan-Palomar Airport and Ramona Airport, both located approximately 11 miles from the project site. Additionally, portions of the City are subject to periodic flyovers from Marine Corps Air Station (MCAS) Miramar. However, the entire City is outside of the 60 CNEL noise contours for these airports. The project site is not within two miles of a public airport, airport land use plan, or private airstrip, would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

XIV. Population and Housing

Would the project:

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

Less Than Significant Impact. The proposed project would directly add to the City's population by providing additional housing. The proposed project would increase the number of dwelling units within the City by 145. According to SANDAG's 2014 population and housing estimates, the average household size in Escondido is 3.12 people. However, as a retirement home, it will be assumed that there would be a maximum of two people per unit. Applying this rate, an additional 145 units could result in a population increase of approximately 290 people.

Construction of 145 dwelling units would not result in substantial indirect growth inducement, however, because: (1) no obstacles to population growth would be removed, such as provision of an essential public service or access to a previously inaccessible area, (2) the project would not induce further growth through the expansion or extension of existing services, utilities, or infrastructure, and (3) this development would support General Plan Housing Policy 1.1 to

“expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.” In addition, the project site is located within a developed urbanized area served by existing proximate infrastructure. Therefore, growth-inducing impacts resulting from project implementation would be less than significant.

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

No Impact. The project proposes the construction of housing on a site that is currently developed with warehouses and a maintenance and repair facility, and would therefore not displace existing housing or substantial numbers of people. No impact would occur.

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 (or conflict with applicable fire and emergency response time thresholds specified in City of Escondido Zoning Code Article 47)?
 - i. Fire protection?

Less Than Significant Impact. The proposed project would be served by the Escondido Fire Department (EFD). The EFD maintains the standard emergency response time of 7.5 minutes 90 percent of the time for all structure fires and emergency Paramedic Assessment Units (General Plan Community Protection Element). The closest fire station to the project site is EFD Station 1, located approximately 150 feet north of the project site on North Quince Street. The proposed project would result in an increase of residents in the area, but this increase is accounted for in the General Plan and is expected to generate an incrementally increased demand for fire protection services. It is likely that some future residents of the proposed project are existing Escondido residents. The proposed project is not expected to result in levels of demand for fire protection that would cause response times to exceed the standard. Additionally, the increase would be offset by the payment of Public Facilities Fees, pursuant to the Citywide Facilities Plan. The project would also be subject to fire and building review to ensure compliance with access and safety standards. Therefore, there would be no need for new or altered fire protection facilities or related infrastructure that could result in significant adverse physical impacts. Impacts would be less than significant.

- ii. Police protection?

Less Than Significant Impact. The proposed project would be served by the Escondido Police Department (EPD). The EPD maintains the standard initial response times of less than 5 minutes for Priority 1 calls and less than 6.5 minutes for Priority 2 calls (General Plan Community Protection Element). The closest police station to the project site is approximately 1.25 miles north of the project site on Centre City Parkway. The proposed project would result in an increase of residents in the area, but this increase is accounted for in the General Plan and is expected to generate an incrementally increased demand for police protection services. It is likely that some future residents of the proposed project are existing Escondido residents. The

proposed project is not expected to result in levels of demand for police protection that would cause response times to exceed the standard. Additionally, the increase would be off-set by the payment of Public Facilities Fees, pursuant to the Citywide Facilities Plan. Therefore, there would be no need for new or altered police protection facilities or related infrastructure that could result in significant adverse physical impacts. Impacts would be less than significant.

iii. Schools?

No Impact. As a senior housing project, there would be no increase in the number of children and no increase in demand on local school facilities. No impact would occur.

iv. Parks?

Less Than Significant Impact. The project would incrementally increase the demand for park space and could increase usage at existing City parks. While the project includes two on-site courtyards, it would have approximately 15 percent less on-site open space (approximately 36,800 sf) than the open-space requirements identified in the Downtown Specific Plan for a “multi-family project” (43,500 sf for the proposed building size). The project would include an amendment to the Downtown Specific Plan to reduce the open space requirement for senior housing projects. The proposed age-restricted/ senior housing is expected to have a reduced average persons-per-household compared to a traditional multi-family housing project, and therefore, a reduced demand for open space/ recreational facilities. A study that was published in the American Journal of Preventative Medicine noted that based on a representative sample of 174 neighborhood parks in 25 major cities across the U.S. with populations greater than 100,000 people, seniors (age 60 or older) represented 4 percent of observed park users, but 20 percent of the general population (Cohen et al. 2016). Based on these considerations, the proposed project would not require the construction of new or expansion of existing park facilities, and impacts to parks would be less than significant.

v. Other public facilities?

Less Than Significant Impact. The construction of 145 senior housing units would result in a relatively small increase in population (approximately 290 people), creating minimal additional demand on other public facilities such as libraries within the City; however, this minor additional demand is not expected to require the construction of new or expanded public facilities and associated impacts would be less than significant.

XVI. Recreation

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

Less Than Significant Impact. The project proposes the development of 145 senior housing units that could cause an incremental increase in the use of existing neighborhood and regional parks and recreation facilities. Associated increases in the use of these facilities, however, would be minor and is not expected to lead to or accelerate substantial physical deterioration of such facilities. As described in Response XV(a)iv, a recent study of 174 neighborhood parks in 25 major cities across the U.S. indicated that although seniors (age 60 or older) represented approximately 20 percent of the general population, they only comprised 4 percent of observed park users (Cohen et al. 2016). As a senior housing development, public park use is expected

to be reduced compared to typical multi-family residential development based on the age of the residents. Furthermore, potential impacts would be offset by the project's payment of Park and Facilities Impact Fees, which are paid upon issuance of building permits. As such, associated impacts would be less than significant.

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

No Impact. The project does not propose the development of recreational facilities or the expansion of existing recreational facilities. No impact would occur.

XVII. Transportation

A TIA was prepared for the proposed project by LLG (2019). The study is summarized below, and the complete TIA is included in Appendix H to this MND.

Would the project:

- a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (or conflict with applicable traffic thresholds specified in City of Escondido Zoning Code Article 47)?

Less Than Significant Impact. Roadway segment and intersection operating conditions are typically described in terms of LOS. LOS is a scale used to indicate the quality of traffic flow on roadway segments and at intersections, with a range from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion). Based upon SANTEC/ITE guidelines and the City of Escondido Traffic Analysis Guideline, if roadway segments or intersections are operating at LOS D or better, impacts are not considered significant (refer to Appendix A of the TIA).

The traffic study area includes the following four street segments and four intersections:

Street Segments

- North Quince Street
 - West Washington Avenue to West Valley Parkway
 - South of West Valley Parkway
- West Valley Parkway
 - Centre City Parkway to North Quince Street
 - West of North Quince Street

Intersections

- West Washington Avenue/North Quince Street
- West Washington Avenue/Centre City Parkway
- West Valley Parkway/North Quince Street
- West Valley Parkway/Centre City Parkway

According to the TIA, the proposed addition of 145 senior residential dwelling units is expected to generate 590 daily trips with 30 trips (12 inbound/18 outbound) during AM peak hour and 41 trips (25 inbound/16 outbound) during PM peak hour.

Street segment capacities and corresponding LOS are provided in Table 4, *Near-term Street Segment Operations*. As shown in the table, all study area street segments are calculated to operate at LOS C or better with the addition of project traffic in the Existing Plus Project conditions. All study area street segments would continue to operate at acceptable levels during the AM and PM peak hours with implementation of the proposed project.

To analyze cumulative impacts, nine cumulative projects in the study area circulation network were identified, including three commercial, three mixed-use residential and commercial, one residential, one hotel, and one office project (refer to Section 8.0 of the TIA for more information). The trips from these cumulative projects in the vicinity of the project site were added to the project intersections and roadway segments. As shown in Table 4, the combined trips of the project and cumulative projects would not cause the LOS of study area street segments to decrease to an unacceptable level in the Near-term Future Plus Project scenario. Therefore, all roadway segments would continue to operate at acceptable levels with the proposed project in place. Associated street segment impacts would be less than significant.

Intersection delays and corresponding LOS are provided in Table 5, *Near-term Intersection Operations*. As shown in the table, all study area intersections are calculated to continue to operate at LOS D or better during the AM and PM peak hours with the addition of project traffic in the Existing Plus Project and Existing Plus Cumulative Plus Project conditions. All study area intersections would continue to operate at acceptable levels during the AM and PM peak hours with implementation of the proposed project. As such, direct impacts to study area intersections would be less than significant.

The TIA determined that no road network changes would be required for the project, and the proposed on-site circulation would be adequate based on the types of vehicles anticipated to frequently enter and exit the site. Based on the above considerations, the project would not conflict with applicable plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system.

Implementation of the project also would not conflict or interfere with policies contained in the General Plan Mobility and Infrastructure Element regarding alternative transportation modes. The Downtown Specific Plan designates the walkway on North Quince Street opposite the project site as part of the pedestrian pathway and linkage system of the downtown area. As it is on the opposite side of the road from the project site, it would not be affected by the project during construction or operation. During construction, the sidewalks adjacent to the project site along North Quince Street and West Valley Parkway would be closed. However, the closure will be temporary and new sidewalks would be provided along the project's western and southern frontages along North Quince Street and West Valley Parkway, respectively, for pedestrian access. The Escondido Creek Trail, commonly used for bicycle riding, begins at the Escondido Transit Center and extends over four miles to Daley Ranch. Access to the Escondido Creek Trail is available from the public right-of-way immediately north of the project site, within the area designated as a trail/fire lane on Figure 4. A new traffic signal would be installed at the trail crossing just south of the channel on N. Quince Street. As a result, implementation of the project would result in improved pedestrian circulation in the area, consistent with the goals of the General Plan Mobility and Infrastructure Element.

**Table 4
NEAR-TERM STREET SEGMENT OPERATIONS**

Street Segment	Capacity (LOS E) ^a	Existing			Existing Plus Project				Existing Plus Cumulative Projects			Existing Plus Cumulative Projects Plus Project			
		ADT	LOS	V/C	ADT	LOS	V/C	Δ	ADT	LOS	V/C	ADT	LOS	V/C	Δ
North Quince Street															
West Washington Avenue to West Valley Parkway	20,000	10,370	B	0.519	10,810	C	0.541	0.022	10,620	B	0.531	11,060	B	0.553	0.022
South of West Valley Parkway	20,000	9,780	B	0.489	10,016	B	0.501	0.012	9,950	B	0.498	10,186	B	0.509	0.011
West Valley Parkway															
Centre City Parkway to North Quince Street	34,200	18,020	B	0.527	18,138	B	0.530	0.003	18,620	C	0.544	18,738	C	0.548	0.004
West of Quince Street	34,200	18,670	C	0.546	18,760	C	0.549	0.005	19,170	C	0.561	19,260	C	0.563	0.002

Source: LLG 2019

^a Capacities based on the City of Escondido Roadway Classification Table

ADT = Average Daily Traffic Volumes; LOS = Level of Service; V/C = Volume to Capacity; "Δ" denotes the Project-induced increase in V/C

**Table 5
NEAR-TERM INTERSECTION OPERATIONS**

Intersection	Control Type	Peak Hour	Existing		Existing Plus Project			Existing Plus Cumulative Projects		Existing Plus Cumulative Projects Plus Project		
			Delay ^a	LOS	Delay	LOS	Δ	Delay	LOS	Delay	LOS	Δ
West Washington Avenue/ North Quince Street	Signal	AM	14.5	B	14.5	B	0.0	14.6	B	14.6	B	0.0
		PM	13.8	B	13.	B	0.0	13.9	B	14.0	B	0.1
West Washington Avenue/ Centre City Parkway	Signal	AM	26.6	C	26.8	C	0.2	30.1	C	30.4	C	0.3
		PM	37.8	D	37.8	D	0.0	41.4	D	41.8	D	0.4
West Valley Parkway/ North Quince Street	Signal	AM	20.9	C	21.0	C	0.1	21.3	C	21.4	C	0.1
		PM	22.8	C	22.8	C	0.0	23.3	C	23.3	C	0.0
West Valley Parkway/ Centre City Parkway	Signal	AM	19.7	B	19.7	B	0.0	20.5	B	20.5	B	0.0
		PM	17.7	B	17.8	B	0.1	17.7	B	18.3	B	0.6

Source: LLG 2019

^a Average delay expressed in seconds per vehicle

LOS = Level of Service; "Δ" denotes the Project-induced increase in Delay

Public transportation would be available through the Escondido Transit Center, located immediately to the west of the project site, across North Quince Street. The Escondido Transit Center serves as a station for the NCTD for the SPRINTER light rail and Breeze rapid bus. As a result, no conflicts associated with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities would occur.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3 subdivision (b) sets forth specific criteria for determining the significance of transportation impacts. Subdivision (b)(1) pertains to land use projects and describes factors that may indicate whether the amount of a land use project's vehicle miles traveled may be significant or not. Projects located within one half mile of transit are considered to have a less than significant transportation impact. As noted above in Response XVII(a), the Escondido Transit Center, which serves as a station for the NCTD for the SPRINTER light rail and Breeze rapid bus, is located immediately to the west of the project site, across North Quince Street. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be less than significant.

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

Less Than Significant Impact. The notable design feature of this project associated with transportation is the access to the ground-level parking lot, which would be provided by a gated driveway along the northwestern portion of the site along North Quince Street. The construction of the gated driveway is not expected to increase hazards as it would be located away from the North Quince Street and West Valley Parkway intersection. The driveway would include a one-to two-car internal queuing area for cars to wait while the gate is opening, in order to reduce the number of cars queuing on Quince Street (refer to Figure 3b). Additionally, the vehicle entrance would have a two-way-left-turn lane within North Quince Street to allow for inbound and outbound project traffic to turn left into and out of the project site and avoid conflicts with the North Quince Street through lanes (LLG 2019). The existing pedestrian median would be modified to accommodate a left turn into the fire lane/trail area for access by the fire department. A new traffic signal would be installed at the Escondido Creek Trail crossing just south of the channel on North Quince Street that would promote safe crossing of the roadway by pedestrians and bicyclists. Therefore, impacts related to increase in hazards from project design features would be less than significant.

d. Result in inadequate emergency access?

Less Than Significant Impact. Impacts to emergency vehicle access along North Quince Street and/or West Valley Parkway in the project site vicinity during construction are not expected to occur. Some construction activities (e.g., construction of new sidewalks, curbs, and gutters; modification of the existing pedestrian median on North Quince Street) may require temporary lane closures; a traffic control plan would be implemented to ensure that adequate access to public roadways by emergency vehicles would be maintained at all times. Accordingly, impacts associated with emergency access would be less than significant.

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 §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 Historic 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 Tribe.

Less Than Significant Impact with Mitigation Incorporated. The general vicinity of the project site is known to have been occupied/used by the Luiseño and Kumeyaay people for thousands of years. Five cultural resource sites have been recorded within a one-mile radius of the project; although none were identified within the project site, and no resources were identified during the field survey. As such, no impacts to known tribal cultural resources would occur.

HELIX contacted and received responses from five Native American tribes regarding ancestral territory within the project area. These responses indicated that the project area is within the ancestral territory of the Luiseño and the Kumeyaay/Diegueño people. Although no tribal cultural resources have been identified within the project site, because the project site is developed, there is potential for unrecognized resources to be discovered upon removal of the structures and pavement during grading and other ground-disturbing activities. The potential for unknown cultural resources is higher due to the presence of alluvial soils and the proximity of the site to Escondido Creek. Mitigation measures **CUL-1** through **CUL-10**, identified in Section V, above would be implemented to ensure that impacts to tribal cultural resources would be less than significant.

In accordance with the requirements of AB 52, the City sent notification to four Native American Tribes traditionally and culturally affiliated with the project area on December 18, 2017. Both the Rincon Band of Luiseño Indians and San Luis Rey Band of Mission Indians (SLR) responded within the 30-day period requesting consultation and additional information. No response was received from the Soboba Band of Luiseño Indians or the Mesa Grande Band of Mission Indians. The Rincon Band replied in two letters dated December 22, 2017 and January 24, 2018. The Rincon Band noted that the project is within the Luiseño Aboriginal Territory of the Luiseño people and within Rincon's area of historic interest. While they did not identify any cultural resources or Traditionally Used Places within the project area, due to the proximity and direct cultural historic ties to the area, they requested to provide the Luiseño Tribal monitoring for the project.

SLR replied in three letters dated January 11, February 26, and March 1, 2018. SLR shared concerns regarding the previous use of the project area, the potential for ground disturbances beyond the initial grade activity for the site (the depth that will be required for the preparation

and installation of wet and dry infrastructure) and the potential negative impact to subsurface tribal cultural resources. Upon review of the cultural resources and geotechnical reports for the project, SLR concluded that incorporation of the standard tribal cultural resource mitigation measures (CUL-1 through CUL-10) would be required to lessen potential negative impacts to subsurface Luiseño tribal cultural resources. Consultation concluded on January 24, 2017 with the Rincon Band and on March 1, 2018 with SLR.

XIX. Utilities and Service Systems

Would the project:

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

Less Than Significant Impact. The proposed project would result in the addition of approximately 290 residents to the area, which would generate a small increase in demand for water services and wastewater treatment. The proposed project would be served by the Hale Avenue Resource Recovery Facility (HARRF), which has a capacity of 18 million gallons per day (MGD) and an average daily flow of 12.7 MGD (City 2019). The relatively small residential project is not of a scale that would substantially increase the demand for wastewater treatment services and would not require the need for new or expanded water or wastewater treatment facilities. Adequate municipal services and utilities such as electric power, natural gas, and telecommunications services and infrastructure are available to serve the project. According to the Drainage Study prepared for the project site by SWS Engineers, Inc (SWS 2019; Appendix E), the proposed project would maintain the existing flow and drainage patterns of the project site, and would result in a decrease in runoff velocity compared to existing conditions. Implementation of the project would not require the construction or expansion of storm water drainage facilities. Impacts associated with these utilities would be less than significant.

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

Less Than Significant Impact. Water is supplied to the City by five water agencies: the City of Escondido Water Department, the Rincon del Diablo Municipal Water District (MWD), the Vallecitos MWD, the Valley Center MWD, and the Vista Irrigation District. The proposed project would result in an incremental increase in demand for water, but the demand would be an amount that the existing entitlements under these five agencies would be able to supply. The project would be consistent with the residential density allowed under the General Plan, and thus, the anticipated water use has been considered in the applicable water supply planning documents that plan for future water supplies. Therefore, no new entitlements or expanded entitlements would be necessary. Additionally, project landscaping would comply with the City's Water Efficient Landscape Regulations (Chapter 33, Article 62 of the Escondido Municipal Code) by installing water-efficient landscaping. As such, impacts would be less than significant.

- 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?

Less Than Significant Impact. As described in Response IXI(a), the proposed project would be served by the HARRF, which has a capacity of 18 MGD. The relatively small residential project is not of a scale that would substantially increase the demand for wastewater treatment services, and the wastewater treatment provider would have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, based on the consistency of the proposed project with planned land uses that are considered in the City's wastewater capacity planning. Therefore, impacts would be less than significant.

- 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?

Less Than Significant Impact. The proposed project would create solid waste that would be collected by Escondido Disposal, Inc. and disposed of at regional landfills. The 145-unit project is not of a scale that would significantly impact these services and facilities, since it would be consistent with the development intensity allowed in the General Plan, which accounted for the adequate provision of solid waste services. The project would comply with all applicable regulations related to solid waste, such as the California Integrated Waste Management Act and the City's recycling programs. As such, impacts would be less than significant.

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

Less Than Significant Impact. Both construction (including demolition) and operation of the proposed project would comply with applicable federal, state, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and the City's recycling programs. Associated impacts would be less than significant.

XX. Wildfire

Would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Refer to Response IX(f). Potential impacts to emergency response or evacuation plans would be less than significant.

- 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?

No Impact. The proposed project is an infill project located within an existing urban area that is not located on a site where slopes, prevailing winds, or other factors may exacerbate wildfire risks. The potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire is negligible and no impact would occur.

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

No Impact. The proposed project is an infill project located within an existing urban area that would not install infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. No impact would occur.

- 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?

No Impact. Refer to Response XX(b). As an infill development project within an urbanized area, the risk of people and structures from downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes is negligible. No impact would occur.

XXI. Mandatory Findings of Significance

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?

Less Than Significant with Mitigation Incorporated. Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of cultural resources (including tribal cultural resources), geology and soils, hazards and hazardous materials, and noise. The project would not degrade the quality of the environment for plant or animal communities, substantially reduce the habitat of a fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of endangered plants or animals.

The project is not expected to impact resources related to major periods of California history or prehistory. Based on the presence of cultural resources in the vicinity of the project site, however, the project would have the potential to impact unknown subsurface cultural resources. With implementation of mitigation measures **CUL-1** through **CUL-10**, however, impacts to unknown subsurface cultural resources would be reduced to below a level of significance.

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

Less than Significant Impact. Cumulative impacts are defined as two or more individual project effects that, when considered together or in concert with other projects, combine to result in a significant impact (CEQA Guidelines Section 15355). As described, project-related effects either would be avoided by incorporation of project design measures, or mitigated to levels below significance, and no cumulatively considerable impacts would occur. Air pollutant and GHG emissions would be less than significant, impacts to unknown buried cultural resources would be avoided through construction monitoring, and noise impacts would be reduced through implementation of project-specific noise abatement measures. Incremental increases in impacts to the environment are within the thresholds set by the General Plan and

supporting planning and regulatory documents. Therefore, the proposed project would not have a significant individual or cumulatively considerable impact on the environment.

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

Less than Significant With Mitigation Incorporated. The proposed project would adhere to regulatory codes, ordinances, regulations, standards, and guidelines applicable to each of the environmental issue areas analyzed herein. As described above, potentially significant impacts resulting from the proposed project with the potential to cause adverse effects on human beings have been identified for the areas of geology and soils, hazards and hazardous materials, and noise. With implementation of mitigation measures **GEO-1**, **HAZ-1**, and **NOI-1**, however, the project is not expected to result in significant long-term or short-term impacts, or result in substantial adverse effects on human beings, either directly or indirectly.

- d. Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a))?

Less Than Significant Impact. The General Plan Quality of Life Standards provide thresholds for potential impacts to air quality, schools, wastewater facilities, water supply, circulation, police and fire services, libraries, parks/open space, and economic prosperity within the City. As described above, the project would result in less than significant impacts related to air quality and would not adversely impact the services identified above. Moreover, the proposed project is consistent with designated land use and development density allowed under the General Plan, which accounted for the use and adequate provision of these services. As such, no deficiencies relative to the City's General Plan Quality of Life Standards or related conflicts with the City EQR would occur.

SOURCE OF INFORMATION/MATERIAL USED IN PREPARATION OF THIS ANALYSIS

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General References

Escondido Zoning Code and Land Use Maps

Escondido Municipal Code

California Department of Conservation San Diego County Important Farmland Map

Escondido Downtown Specific Plan

Escondido Creek Trail Master Plan Report

SANDAG Demographic and Socio Economic Estimates for Escondido

California Department of Transportation Scenic Highway Mapping System for San Diego County

USGS 7.5-Minute Topographic Quadrangle Map; Escondido

Site Visits and Field Inspections

Project Description and Preliminary Information

SUMMARY OF MITIGATION MEASURES

Cultural and Tribal Cultural Resources:

- CUL-1** The City of Escondido Planning Division (“City”) recommends the applicant 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”) prior to issuance of a grading permit. 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 them. 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 proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.
- CUL-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.
- CUL-3** The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.
- CUL-4** During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. 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. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.
- CUL-5** In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.
- CUL-6** If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the

significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

CUL-7 The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then 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. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. 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.

CUL-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 they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an 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. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

CUL-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or 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 and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe 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.

CUL-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion 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 California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

Geology and Soils:

GEO-1 Implementation of Geotechnical Recommendations. General and specific recommendations identified in Section 8.0 of the project Geotechnical Investigation prepared by SCST (2017) shall be implemented in the design and construction of the proposed project to address the presence of potentially compressible and potentially liquefiable soils. To mitigate the potentially compressible soils and reduce the potential for static settlement and distress to the planned building and improvements, remedial grading of the existing upper soil shall be performed. To mitigate the liquefaction hazard and the resulting settlements to acceptable levels, ground improvement consisting of rammed aggregate piers extending down to the underlying granodiorite shall be performed. A qualified geotechnical consultant shall observe the ground improvement operations and verify that hazards related to compressible soils and liquefaction have been mitigated to acceptable levels. All applicable recommendations, including those identified in the Geotechnical Investigation (SCST 2017) located in Appendix C to this MND, shall be included on the grading and site plans prepared for the project and shall be implemented during project design and construction. Project grading plans shall be reviewed by a qualified geotechnical consultant prior to final design submittal to determine if additional analysis and recommendations beyond those summarized above (and listed in full in the Geotechnical Investigation) are required. All geotechnical recommendations shall be fully implemented in accordance with applicable industry/regulatory standards (e.g., CBC requirements).

Hazards and Hazardous Materials:

HAZ-1 Soils Testing. Testing for soil contamination shall be conducted by an individual licensed in the State of California to assess soil conditions for the potential presence of contaminated soils following the completion of grading activities, but prior to construction of on-site structures. Soil sampling shall be performed in areas deemed most likely to have had residual impact from previously released diesel fuel, gasoline, or waste oil associated with the historical recognized environmental condition at the property. In the event that contaminated soils are encountered, these soils shall be properly tested, managed, and disposed of at a licensed facility in accordance with the County Department of Environmental Health requirements.

Noise:

NOI-1 Interior Noise Reduction. For the project's habitable areas (both living rooms and bedrooms) with a view (including partial) of North Quince Street or West Valley Parkway, which are likely to exceed an interior noise level of 45 CNEL, the following

measures shall be incorporated to provide the required noise control to ensure that noise levels at interior habitable areas are 45 CNEL or less:

- Exterior wall requirement of standard 0.875-inch stucco over 0.5-inch shearwall on 2x6 studs with 0.625-inch Type “X” Drywall.
- Minimum window requirement of STC 28.
- Window construction of dual glazing window thickness 0.125-inch and 0.5-inch air gap.
- Appropriate means of air circulation and provision of fresh air must be present to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior.
- The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2013 CBC) to ensure that windows would be able to remain permanently closed.

MITIGATION MONITORING AND REPORTING PROGRAM

PROJECT NAME: 220 North Quince Street Senior Housing Project
CITY FILE NO.: ENV 17-0008
APPROVAL BODY: Planning Commission

PROJECT DESCRIPTION: The project proposes a five-story, affordable senior housing development with ground-floor parking and four stories of residences above. The project would construct 145 residential units (97.9 units/gross acreage, or 98.3 units/net acreage density) and provide 142 parking spaces. The entrance lobby would be located at the street (parking) level facing North Quince Street. Two courtyards would be provided at the podium (second) level and would be open to the northeastern edge of the property. An overlook plaza would be provided in the southwest corner of the podium level, facing the intersection of North Quince Street and West Valley Parkway. A leasing area and a 4,800-sf community room with a kitchen, office, and laundry facilities also would be provided at the podium level. New curbs, gutters, sidewalks, and street trees would be provided along the project's western and southern frontages along North Quince Street and West Valley Parkway, respectively. The driveway entry into the ground-level parking would be located near the northwestern corner of the project from North Quince Street. Storm drain improvements, upsizing of water and sewer mains, and connections to existing public utility and upsized water and sewer lines would be required.

PROJECT LOCATION: The proposed project is located in the City of Escondido (City) at the northeast corner of West Valley Parkway and North Quince Street. The project site is approximately 1.47 net acres (1.488 gross acres) and is developed with three approximately 10,000-square-foot (sf) warehouse buildings and one approximately 2,000-sf building formerly used as a maintenance and repair facility for a moving and storage company. A small paved and striped parking area, as well as driveways and other parking areas formerly utilized for outdoor storage are located within the site.

PROJECT MANAGER: Adam Finestone, Principal Planner
PHONE NUMBER: (760)839-6203
EMAIL: afinestone@escondido.org

Mitigation Monitoring and Reporting Program for the 220 North Quince Street Senior Housing Project

Mitigated Negative Declaration/Initial Study Environmental Checklist

City File No. ENV 17-0008

The City of Escondido adopts this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the 220 North Quince Street Senior Housing Project (proposed project), which is the subject of the Draft Mitigated Negative Declaration (MND) and Initial Study Environmental Checklist, complies with all applicable environmental mitigation requirements. The mitigation described in the MND and summarized below provides a broad purpose and overview of actions that will occur in order to reduce identified environmental impacts.

For each project that is subject to CEQA, PRC Section 21081.6 requires the Lead Agency to monitor performance of the mitigation measures included in any environmental document to ensure that the specified mitigation is implemented. The City of Escondido is the designated Lead Agency for the proposed project. The City is responsible for review of all monitoring reports, enforcement actions, and document disposition related to implementation of the MMRP.

After review and approval by the Lead Agency, minor changes to the MMRP are permitted but can only be made by the City of Escondido. No deviations from this MMRP shall be permitted unless it continues to satisfy the requirements of PRC Section 21081.6, as determined by the City of Escondido.

The organization of the MMRP follows the subsection formatting style presented within the MND and Initial Study Environmental Checklist. Only those subsections of the environmental issues presented in the Initial Study Environmental Checklist that have mitigation measures are provided below in the MMRP table. All other subsections do not contain mitigation measures. For each mitigation measure, the MMRP table identifies the following: (1) mitigation measure, (2) implementation action, (3) responsible agency/party, (4) monitoring schedule, and (5) verification date.

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
Cultural Resources						
<p>CUL-1: The City of Escondido Planning Division (“City”) recommends the applicant 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”) prior to issuance of a grading permit. 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 them. 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 proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.</p>	<ul style="list-style-type: none"> Applicant should enter into a Tribal Cultural Resource Treatment and Monitoring Agreement. 	Applicant; City of Escondido Community Development Department Planning Division	X			
<p>CUL-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.</p>	<ul style="list-style-type: none"> Require verification and approval of qualified archaeologist. 	Applicant; City of Escondido Community Development Department Planning Division	X			

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
CUL-3: The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.	<ul style="list-style-type: none"> Require monitoring program coordination. 	City of Escondido Community Development Department Planning Division; Qualified Archaeologist; Grading Contractor	X			
CUL-4: During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. 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. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.	<ul style="list-style-type: none"> Require on-site archaeological monitor and Native American Monitor. 	City of Escondido Community Development Department Planning Division; Archaeological Monitor; Field Engineering Division		X		
CUL-5: In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.	<ul style="list-style-type: none"> Require identification and preservation of any unidentified cultural resources. 	City of Escondido Community Development Department Planning Division; Project Archaeologist; County Coroner; Native American Monitor		X		
CUL-6: If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered	<ul style="list-style-type: none"> Require identification and preservation of any significant tribal resource. Consultation with Native American Monitor. 	City of Escondido Community Development Department Planning Division; Project		X		

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.		Archaeologist; Native American Monitor; TCA Tribe				
CUL-7: The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then 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. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. 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.	<ul style="list-style-type: none"> Require research design and data recovery program. Consultation with Native American Monitor. 	City of Escondido Community Development Department Planning Division; Project Archaeologist; TCA Tribe		X		
CUL-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 they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any	<ul style="list-style-type: none"> Require identification and preservation of any undiscovered cultural resources or human remains. 	City of Escondido Community Development Department Planning Division; Project Archaeologist; County Coroner		X		

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
<p>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. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.</p>						
<p>CUL-9: If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or 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 and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe’s cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe 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.</p>	<ul style="list-style-type: none"> Require that a Native American monitor is present during any testing or cataloging. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Any tribal cultural resources collected by the qualified archaeologist that are denied collection by the TCA Tribe shall be curated at the San Diego Archaeological Center. Any resource determined not to be a tribal cultural resource shall be curated at the San Diego Archaeological Center. 	<p>City of Escondido Community Development Department Planning Division; Project Archaeologist</p>		X	X	

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
<p>CUL-10: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion 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 California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.</p>	<ul style="list-style-type: none"> Require documentation of analysis and data by the qualified archaeologist. Consultation with Native American Monitor. 	<p>Qualified Archaeologist; Native American Monitor</p>			X	
Geology and Soils						
<p>GEO-1: General and specific recommendations identified in Section 8.0 of the project Geotechnical Investigation prepared by SCST (2017) shall be implemented in the design and construction of the proposed project to address the presence of potentially compressible and potentially liquefiable soils. To mitigate the potentially compressible soils and reduce the potential for static settlement and distress to the planned building and improvements, remedial grading of the existing upper soil shall be performed. To mitigate the liquefaction hazard and the resulting settlements to acceptable levels, ground improvement consisting of rammed aggregate piers extending down to the underlying granodiorite shall be performed. A qualified geotechnical consultant shall observe the ground improvement operations and verify that hazards related to compressible soils and liquefaction have been mitigated to acceptable levels. All applicable recommendations, including those identified in the Geotechnical Investigation (SCST 2017) located in Appendix C of the MND, shall be included on the grading and site plans prepared for the project and shall be implemented during project design and construction. Project grading plans shall be reviewed by a qualified</p>	<ul style="list-style-type: none"> Require remedial grading of existing upper soil. Require ground improvement consisting of rammed aggregate piers extending down to the underlying granodiorite. Require a qualified geotechnical consultant to observe the ground improvement operations and grading. Require a qualified geotechnical consultant to review final design submittal. 	<p>Qualified Geotechnical Consultant; Construction Contractor</p>	X	X		

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
geotechnical consultant prior to final design submittal to determine if additional analysis and recommendations beyond those summarized above (and listed in full in the Geotechnical Investigation) are required. All geotechnical recommendations shall be fully implemented in accordance with applicable industry/regulatory standards (e.g., CBC requirements).						
Hazards and Hazardous Materials						
HAZ-1: Testing for soil contamination shall be conducted by an individual licensed in the State of California to assess soil conditions for the potential presence of contaminated soils following the completion of grading activities, but prior to construction of on-site structures. Soil sampling shall be performed in areas deemed most likely to have had residual impact from previously released diesel fuel, gasoline, or waste oil associated with the historical recognized environmental condition at the property. In the event that contaminated soils are encountered, these soils shall be properly tested, managed, and disposed of at a licensed facility in accordance with the County Department of Environmental Health requirements.	<ul style="list-style-type: none"> Require testing for soil contamination in areas most likely to have had residual impact from previously released hazardous materials. Require testing, managing, and disposal of contaminated soils. 	Applicant/ Construction Contractor	X			
Noise						
NOI-1: For the project's habitable areas (both living rooms and bedrooms) with a view (including partial) of North Quince Street or West Valley Parkway, which are likely to exceed an interior noise level of 45 CNEL, the following measures shall be incorporated to provide the required noise control to ensure that noise levels at interior habitable areas are 45 CNEL or less: <ul style="list-style-type: none"> Exterior wall requirement of standard 0.875-inch stucco over 0.5-inch shearwall on 2x6 studs with 0.625-inch Type "X" Drywall. Minimum window requirement of STC 28. Window construction of dual glazing window thickness 0.125-inch and 0.5-inch air gap. 	<ul style="list-style-type: none"> Require incorporation of noise minimization measures into the construction of exterior walls and windows. Require appropriate air circulation. Require the inclusion of a mechanical ventilation system into the building design. 	Applicant/ Construction Contractor	X	X		

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule			Verification Date
			Before Construction	During Construction	After Construction	
<ul style="list-style-type: none"> Appropriate means of air circulation and provision of fresh air must be present to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior. The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2013 CBC) to ensure that windows would be able to remain permanently closed. 						

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