

Eagle Scout Lake Bridge Replacement Project

Final Initial Study/Mitigated Negative Declaration

City File No. PL23-0033
State Clearinghouse No. 2023050625

Prepared for:
City of Escondido
201 N Broadway
Escondido, CA 92025

Prepared by:
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July 2023 | 01391.00026.001

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Table of Contents

<u>Section</u>	<u>Page</u>
Final Mitigated Negative Declaration	MND-Error! Bookmark not defined.
Notice of Intent to Adopt a Mitigated Negative Declaration	MND-Error! Bookmark not defined.
Comments Received on the Draft IS/MND and Responses	RTC-1
Comment Letters Received.....	RTC-1
Revisions to the Draft IS/MND.....	RTC-1
Responses to Comments	RTC-3
1.0 Introduction	1
1.1 Initial Study Information Sheet.....	1
1.2 Environmental Factors Potentially Affected.....	5
Determination.....	6
2.0 Environmental Initial Study Checklist	7
I. Aesthetics.....	9
II. Agriculture and Forestry Resources.....	11
III. Air Quality	12
IV. Biological Resources	17
V. Cultural Resources	26
VI. Energy	30
VII. Geology and Soils.....	31
VIII. Greenhouse Gas Emissions.....	36
IX. Hazards and Hazardous Materials	39
X. Hydrology and Water Quality	42
XI. Land Use and Planning.....	46
XII. Mineral Resources	47
XIII. Noise	48
XIV. Population and Housing.....	51
XV. Public Services.....	52
XVI. Recreation.....	53
XVII. Transportation	54
XVIII. Tribal Cultural Resources	56
XIX. Utilities and Service Systems	58
XX. Wildfire	60
XXI. Mandatory Findings of Significance.....	61

Table of Contents (cont.)

<u>Section</u>	<u>Page</u>
3.0	References 64
4.0	Preparers..... 67

LIST OF APPENDICES

A	Air Quality and Greenhouse Gas Modeling Results (CalEEMod)
B	Biological Resources Assessment
C	Cultural Resources Identification Report
D	Roadway Construction Noise Model Outputs
E	Mitigation Monitoring and Reporting Program

LIST OF FIGURES

<u>No.</u>	<u>Title</u>	<u>Follows Page</u>
1	Regional Location.....	2
2	USGS Topography.....	2
3	Aerial Photograph.....	2
4	Site Plan.....	2
5	Perspective View of Replacement Bridge.....	2
6	Vegetation Communities and Potentially Jurisdictional Features.....	18

LIST OF TABLES

<u>No.</u>	<u>Title</u>	<u>Page</u>
1	Estimated Maximum Daily Construction Emissions.....	14
2	Potentially Jurisdictional Aquatic Resources.....	24
3	Estimated Project-related GHG Emissions.....	38
4	Construction Equipment Noise Levels.....	49

Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADT	average daily trips
AMSL	above mean sea level
APE	area of potential effects
APN	Assessor's Parcel Number
BMPs	best management practices
BRA	Biological Resources Assessment
BSA	biological study area
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emission Estimator Model
Caltrans	California Department of Transportation
CAP	City of Escondido Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	methane
CHRIS	California Historical Resources Information System
City	City of Escondido
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
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
Draft MHCP	Draft Escondido Multiple Habitat Conservation Program
EFD	Escondido Fire Department
EPD	Escondido Police Department
EQR	Environmental Quality Regulations
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency

Acronyms and Abbreviations (cont.)

General Plan	City of Escondido General Plan
GHG	greenhouse gas
HELIX	HELIX Environmental Planning, Inc.
HFCs	hydrofluorocarbons
HFPA	Hardline Focused Planning Area
HRA	Health Risk Assessment
I-	Interstate
IBC	International Building Code
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
JURMP	Jurisdictional Urban Runoff Management Plan
L _{EQ}	one-hour average equivalent sound level
LID	low-impact development
LOS	Level of Service
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
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
OHWM	ordinary high water mark
Park	Kit Carson Park
PFCs	perfluorocarbons
PM ₁₀	Particulate matter 10 microns or less in diameter
PM _{2.5}	Particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PVC	polyvinyl chloride

Acronyms and Abbreviations (cont.)

RAQS	Regional Air Quality Strategy
RCNM	Road Construction Noise Model
REAP	Rain Event Action Plan
ROG	reactive organic gas
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	South Coast Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDG&E	San Diego Gas and Electric Company
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Program
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TCA Tribes	Native American tribes that are traditionally and culturally affiliated with the project location (Kumeyaay and Luiseño tribes)
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VdB	vibration decibel
VMT	vehicle miles traveled

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CITY OF ESCONDIDO
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FINAL MITIGATED NEGATIVE DECLARATION

Eagle Scout Lake Bridge Replacement Project
City File No. PL23-0033

An Initial Study (IS) Environmental Checklist was prepared for this Project and was included with the 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 IS/MND assesses the environmental effects of the proposed Eagle Scout Lake Bridge Replacement Project located at 3341 Bear Valley Parkway, Escondido, CA 92025 (Assessor's Parcel Number 271-030-12-00 / 760-170-44-00, 760-244-37-00 and others). The 0.33-acre Project site is located on the northeastern side of Eagle Scout Lake within the 285-acre Kit Carson Park. The Project proposes to design and construct a new bridge to replace the existing damaged crossing and address deficiencies with the current design. The existing damaged 72-inch by 44-inch corrugated steel oval "squash" pipe (measuring 17 feet in length) would be removed and a new cast-in-place, double wall, 34-foot long by 20-foot-wide concrete box culvert would be constructed. The Project additionally includes the relocation of a portion of an 18-inch-diameter reclaimed water line and a 4-inch-diameter fiber optic conduit located in the vicinity of the existing culvert.

The Draft IS/MND was submitted to the State Clearinghouse (SCH) and the Governor's Office of Planning and Research (OPR) on May 25, 2023 for a 30-day public review period (SCH No. 2023050625). As mandated by state CEQA Guidelines Section 15105, affected public agencies and the interested public were invited to submit comments on the Draft IS/MND during the 30-day public review period starting **May 25, 2023** and ending on **June 23, 2023**. The Final IS/MND includes and responds to comments received on the Draft IS/MND. All comments received will be considered with the Final IS/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/eagle-scout-lake-bridge-project>. 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.



CITY OF ESCONDIDO
PLANNING DIVISION
201 NORTH BROADWAY
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NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

CASE NO.: PL23-0033 Eagle Scout Lake Bridge Replacement Project

DATE ISSUED: May 25, 2023

PUBLIC REVIEW PERIOD: May 25, 2023 – June 23, 2023

LOCATION: The 0.33-acre Project site is located on the northeast side of Eagle Scout Lake within the 285-acre Kit Carson Park, in the City of Escondido, County of San Diego, addressed at 3341 Bear Valley Parkway, Escondido, CA 92025 (Assessor's Parcel Number 760-244-37-00).

PROJECT DESCRIPTION: The Project includes design and construction of a new bridge to replace the existing damaged crossing. The existing damaged 72-inch by 44-inch corrugated steel oval "squash" pipe (measuring 17 feet in length) would be removed and a new cast-in-place, double wall, 34-foot by 16-foot concrete box culvert would be constructed. The Project also includes relocation of a portion of an 18-inch-diameter reclaimed water line and a 4-inch-diameter fiber optic conduit located in the vicinity of the existing culvert.

APPLICANT: City of Escondido

An Initial Study has been prepared to assess this project as required by the California Environmental Quality Act and Guidelines, Ordinances and Regulations of the City of Escondido. The draft Initial Study/Mitigated Negative Declaration (IS/MND) are on file in the City of Escondido Planning Division and can be viewed on the City of Escondido web site (*Active Development Projects*) at: <https://www.escondido.org/eagle-scout-lake-bridge-project>. Further information may be obtained by contacting the Jay Paul, Senior Planner, telephone (760) 839-4537 or email at jpaul@escondido.org.

Findings: The findings of this review are that the Initial Study identified effects related to biological resources and cultural/tribal cultural resources, that might be potentially significant. Design and minimization measures, revisions in the project plans, and/or mitigation measures agreed to by the applicant would provide mitigation to a point where potential impacts are reduced to less than a significant level. The final IS/MND will require consideration and adoption by the Escondido Zoning Administrator. A public meeting for the adoption of the final IS/MND by the Zoning Administrator has not yet been scheduled.



Jay Paul
Senior Planner

Comments Received on the Draft IS/MND and Responses

COMMENT LETTERS RECEIVED

The following commenter submitted a written letter to the City during the 30-day public review period on the Draft IS/MND (May 25, 2023 – June 23, 2023):

- A. David Mayer, California Department of Fish and Wildlife (June 23, 2023)

The City has provided a written response to each numbered comment. The comment letter and responses are provided on the following pages in side-by-side format. The numbered comments are provided on the left side of the page and the City's response is provided on the right side of the page opposite each comment.

REVISIONS TO THE DRAFT IS/MND

Following the public review period of the Draft IS/MND, clarifications and corrections were incorporated into the Final IS/MND. Comments received during public review period of the Draft IS/MND resulted in modifications to Section 2.IV(a), *Biological Resources*, specifically mitigation measures BIO-1 and BIO-2. An additional clarification has been added regarding the size of the proposed replacement culvert. Revisions are summarized in the table below. Text changes in the Final IS/MND are indicated by ~~strikeout~~ (deleted text) and underline (inserted text) markings in the Environmental IS Checklist, including a line in the margin next to the modified text. Note that minor text changes (e.g., typographical corrections) are not reflected in this table or in underlined format of the Final IS/MND.

The Final IS/MND also includes the Mitigation Monitoring and Reporting Program, included as Appendix E.

No new information has been presented in the Final IS/MND that would require recirculation of the Draft IS/MND pursuant to CEQA Guidelines Section 15088.5(a). Specifically, no new significant environmental impacts would result from the project or from new mitigation measures proposed for implementation. The Draft IS/MND included adequate information for a meaningful public review and comment.

Summary of Revisions to the Draft IS/MND

Location in the Final IS/MND	Description of Change
Section 1.1, Item 7 – Description of Project	The project description was revised to clarify that the new concrete box culvert would be 34-foot long by 20-foot wide. The Draft IS/MND had stated that the box culvert would be 34-foot by 16-foot wide.
Section 2.IV(a), Mitigation Measure BIO-1	In response to the CDFW comment letter, the mitigation measure has been revised to include the following: <ul style="list-style-type: none"><li data-bbox="667 558 1357 695">• Pre-construction surveys shall include the presence of individual western pond turtles in addition to active western pond turtle nests to ensure that non-nesting turtles are avoided.<li data-bbox="667 737 1414 905">• Installment of exclusionary fencing prior to Project activities and daily biological monitoring to ensure that the exclusionary fencing is intact and that no turtles are within the exclusion area prior to construction activities for the duration of Project construction.<li data-bbox="667 947 1406 1010">• Required procedures if a western pond turtle individual or nest is observed within the impact area.
Section 2.IV(a), Mitigation Measure BIO-2	In response to the CDFW letter, the mitigation measure has been revised to state that pre-construction nesting bird surveys shall be conducted no more than three days prior to construction activities, including vegetation removal, instead of the one week that was previously included in the mitigation. Additionally, mitigation measure BIO-2 has been revised to delineate specific suitable avoidance buffers per the recommendations of CDFW.

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STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor
DEPARTMENT OF FISH AND WILDLIFE Chariton H. Bonham, Director
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3883 Ruffin Road | San Diego, CA 92123
wildlife.ca.gov

June 23, 2023

Jay Paul
Senior Planner
City of Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
JPaul@escondido.org

Subject: Eagle Scout lake Bridge Replacement Project (Project), Mitigated Negative Declaration (MND), SCH #2023050625

Dear Mr. Paul:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced MND for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

wildlife.ca.gov

1. This comment is introductory in nature and provides background information regarding the role of CDFW as a Responsible and Trustee Agency and the agency responsible for administering the Natural Community Conservation Planning program. The CDFW's jurisdiction is recognized. Because the comment does not address adequacy of the IS/MND under CEQA, no additional response is required.

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Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 2 of 9

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CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program. The Project is within the boundaries of the Draft Escondido Multiple Habitat Conservation Program Subarea Plan (Escondido Subarea Plan); however, this plan has not yet been approved or adopted. Nonetheless, the draft Escondido Subarea Plan identifies key biological resources and conservation objectives considered critical to address when in potential conflict with proposed development projects.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Escondido

Objective: The objective of the Project is to replace an existing bridge at Kit Carson Park that is damaged, is accumulating excess sediment, and has become a public safety issue. The project will involve the removal of the existing damaged 72-inch by 44-inch corrugated steel oval "squash" pipe (measuring 17 feet in length) and construction of a new, cast-in-place, double wall, 34-foot by 16-foot concrete box culvert. All existing concrete will be removed. Existing riprap on the north side of the bridge will be removed, salvaged, and re-installed after channel grading to improve flow. A portion of an existing 18-inch diameter reclaimed water line and a 4-inch-diameter PVC fiber optic conduit located in the vicinity of the existing culvert will be removed and relocated to the southern side of the new bridge. During construction, the Arroyo Del Oro Creek will be re-routed temporarily.

Location: The Project site is in Kit Carson Park, which is in the City of Escondido at 3341 Bear Valley Parkway. The park has three ponds, one of which is the centrally located Eagle Scout Lake. The Arroyo Del Oro tributary of Kit Carson Creek is an open channel drainage that conveys runoff from the north end of

2. This comment provides a summary of the Project description with emphasis on the biological conditions as background for the subsequent comments. The comment does not address adequacy of the IS/MND under CEQA, and no additional response is required.

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Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 3 of 9

the park and flows south, terminating at Eagle Scout Lake. The 0.33-acre Project site is located at the existing Arroyo Del Oro Creek culvert bridge.

Biological Setting: The Project is located within the San Dieguito River watershed. The Arroyo Del Oro tributary of Kit Carson Creek is an intermittent, seasonally flooded streambed that drains through the Project site into the northern portion of Eagle Scout Lake. In high water conditions, Eagle Scout Lake overflows into wetland areas in the southern portion of the park. Flow from the lake enters Lake Hodges from a tributary and associated wetlands approximately 2.5 miles southwest of the Project site, and then eventually to the San Dieguito River approximately 7 miles to the southwest of the Project site at Lake Hodges Dam.

Four vegetation communities were mapped within the Study Area, including southern cottonwood-willow riparian forest (1.64 acres), southern willow scrub (1.71 acres), coast live oak woodland (2.45 acres), and non-native grassland (0.57 acre). No direct impacts, e.g., vegetation removal, are planned for these areas. The majority of the Study Area (approximately 28.5 acres), including the 0.33-acre Project site, consists of developed or disturbed land cover, such as roads, parking lots, landscaped areas planted with ornamental vegetation, and the shore of Eagle Scout Lake. The northern edge of the Project site borders the southern cottonwood-willow riparian forest habitat.

Sensitive wildlife species with moderate-to-high potential to occur within the Study Area include western pond turtle (*Emys marmorata*; California Species of Special Concern (SSC)), southwestern willow flycatcher (*Empidonax traillii extimus*; CESA listed-endangered, Federal Endangered Species Act (ESA) listed-endangered), least Bell's vireo (*Vireo bellii pusillus*; CESA listed-endangered, ESA listed-endangered), coastal California gnatcatcher (*Poliophtila californica californica*; SSC, ESA listed-threatened), pallid bat (*Antrozous pallidus*; SSC), and western yellow bat (*Lasiurus xanthinus*; SSC).

No special status plant species are expected to occur on site. One coast live oak tree is located within the Project site footprint, but it will be preserved in place.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Escondido in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

- Each of the comments and recommendations provided by CDFW are addressed in the following responses. The comment that the proposed avoidance measure for western pond turtle may not be sufficient to lower impacts is discussed below.

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June 23, 2023
Page 4 of 9

COMMENT #1: Impacts to Western Pond Turtle

Issue: The proposed avoidance measure for western pond turtle may not be sufficient to lower impacts to less than significant.

Specific impact: Mitigation Measure (MM) BIO-1 states that if construction must occur during the breeding season for western pond turtle, preconstruction surveys shall be performed by a qualified biologist within the Project Area and staging area to determine whether active western pond turtle nests are present, and that construction shall not occur within 50 feet of an active nest site. However, no measure is in place for avoidance of non-nesting turtles, and no survey time frame is provided. Additionally, no western pond turtle exclusion or relocation plan is provided.

Why impact would occur: Western pond turtle is a Species of Special Concern known to be present within Eagle Scout Lake; per the MND, they have been observed on site as recently as 2021. This species uses both aquatic and terrestrial habitats and is known to nest up to 325 feet from suitable aquatic sites. Project activities could lead to trapping or crushing western pond turtles.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Mitigation Measure #1

To minimize significant impacts: CDFW recommends that MM BIO-1 be modified as follows (suggestions in ~~strikeout~~ and **bold**):

Construction ~~If construction must occur during the breeding season for western pond turtle (April through August), shall be avoided as feasible. Within one week prior to any construction activities, preconstruction surveys shall be performed by a qualified biologist within the Project Area and staging area (including a 50-foot buffer) to determine whether western pond turtles or active western pond turtle nests are present. If active nests are present, they shall be flagged and avoided until the eggs have hatched or they are no longer active, as determined by the qualified biologist. To avoid impacts to western pond turtle, construction shall not occur within 50 feet of an active nest site (burrow). Prior to Project activities, exclusionary fencing shall be used to ensure western pond turtles are kept out of the construction area. This fencing will be maintained throughout the duration of construction. The integrity of the~~

As indicated in Section 2.IV(a) of the Environmental Initial Study Checklist, western pond turtles are known to occur in the vicinity of the Project Area, upstream and downstream of Lake Hodges. Implementation of the Project has the potential to impact western pond turtle habitat and individuals during construction of the culvert bridge. As requested, mitigation measure BIO-1 has been revised in the Final IS/MND to ensure that pre-construction surveys include observance of individual western pond turtles in addition to active western pond turtle nests, to ensure that non-nesting turtles are avoided within the Project Area during the breeding season. Additionally, mitigation measure BIO-1 has been revised to include the installation of exclusionary fencing prior to Project activities, including daily biological monitoring to ensure that the exclusionary fencing is intact and that no turtles are within the exclusion area prior to construction activities each day for the duration of the Project construction. The mitigation measure has been revised to include required procedures if a western pond turtle individual or nest are observed within the impact area. Modifications to mitigation measure BIO-1 are provided in tracked changes below and incorporated into Section 2.IV(a) of the Final IS/MND and the MMRP:

BIO-1 ~~If~~ Construction must occur during the breeding season for western pond turtle (April through August) shall be avoided as feasible. Within one week prior to any construction activities that may occur during the breeding season, pre-construction surveys shall be performed by a qualified biologist within the Project Area and staging area (including a 50-foot buffer) to determine whether western pond turtles or active western pond turtle nests are present. If active nests are present, they shall be flagged and avoided until the eggs have hatched or

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Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 5 of 9

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exclusion fencing will be checked daily by a Biological Monitor. Additionally, a Biological Monitor will check the work area every morning before construction begins to ensure that no turtles are within the exclusion area. If a western pond turtle individual or nest is observed in the impact area, construction activities will stop until the Biological Monitor establishes an appropriate buffer, or the turtle is no longer in the impact area. A qualified biologist (with pond turtle trapping/handling experience and holding a CDFW Scientific Collecting Permit) may relocate western pond turtles to an appropriate nearby location if necessary. Relocation areas shall be approved by CDFW prior to relocation of any turtles.

COMMENT #2: Impacts to Nesting Birds

Issue: The MND may not adequately address impacts to nesting birds.

Specific impact: MM BIO-2 states that if construction activities must occur during the avian nesting season, a nesting bird survey shall be completed by a qualified biologist no earlier than one week prior to construction activity. This timeline may not be sufficient to avoid impacts to nesting birds. Additionally, specific buffer distances from nests are not discussed.

Why impact would occur: Areas directly adjacent to the Project site contain suitable habitat for a variety of sensitive avian species, including southwestern willow flycatcher, least Bell's vireo, and coastal California gnatcatcher. In addition to direct removal of habitat, construction noise, vibration, dust, or human disturbance could result in temporary or long-term disturbance of nesting birds on the Project site.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Recommendation #1

To minimize significant impacts: CDFW recommends that preconstruction nesting bird surveys be conducted no more than three days prior to construction activities, including vegetation removal. If nesting birds are detected during surveys, CDFW recommends that buffers be established around nest sites with the following distances: a minimum of 100 feet for general bird nests, 300 feet for sensitive bird species, 500 feet for raptors. Reductions in buffers may be appropriate based on screening vegetation, ambient levels of human activities, or other factors.

3. (cont.) they are no longer active, as determined by the qualified biologist. To avoid impacts to western pond turtle, construction shall not occur within 50 feet of an active nest site (burrow). Prior to project activities, exclusionary fencing shall be used to ensure western pond turtles are kept out of the construction area. This fencing will be maintained throughout the duration of construction. The integrity of the exclusion fencing will be checked daily by a Biological Monitor. Additionally, a Biological Monitor will check the work area every morning before construction begins to ensure that no turtles are within the exclusion area. If a western pond turtle individual or nest is observed within the impact area, construction activities will stop until the Biological Monitor establishes an appropriate buffer, or the turtle is no longer in the impact area. A qualified biologist (with pond turtle trapping/handling experience and holding a CDFW Scientific Collecting Permit) may relocate western pond turtles to an appropriate nearby location if necessary. Relocation areas shall be approved by CDFW prior to relocation of any turtles. Prior to construction upslope of or within an intermittent stream or pond area located within the BSA, BMPs shall be installed to prevent runoff, siltation, or hazardous materials from entering these aquatic features. These BMPs shall include, but are not limited to, biodegradable straw waddles free from weed seed, silt fencing, hydroseeding, and/or biodegradable erosion control mats/blankets. Specific BMPs shall be defined and approved by the City prior to construction to ensure adequate protection of these aquatic features. Spill kits shall be available during construction activities in the event of an accidental hazardous materials release.

4. As indicated in Section 2.IV(a) of the Environmental Initial Study Checklist, although no sensitive avian species were observed within the biological study area (BSA) of the Project, there is suitable riparian habitat for federally and state listed bird species adjacent to the Project Area, including southwestern willow flycatcher and least Bell's vireo, which are federally and state listed as endangered; and coastal California gnatcatcher, which is federally listed as threatened. In addition, critical habitat has been mapped for coastal California gnatcatcher within the BSA. A significant impact to these species may occur if removal of riparian habitat or construction during the breeding season would be required.

As requested in the comment letter, mitigation measure BIO-2 has been revised to state that pre-construction nesting bird surveys shall be conducted no more than three days prior to construction activities, including vegetation removal, instead of the one week that was previously included in the mitigation measure. Additionally, mitigation measure BIO-2 has been revised to delineate specific suitable avoidance buffers per the recommendations of CDFW. Modifications to mitigation measure BIO-2 are provided in tracked changes below and incorporated into Section 2.IV(a) of the Final IS/MND and the MMRP:

BIO-2 In order to avoid violation of the federal Migratory Bird Treaty Act and California Fish and Game Code, construction activities shall occur outside of the general avian breeding ~~bird~~ season (September 16 through January 31) to avoid impacts to native nesting birds. If construction must occur during the nesting season, a nesting bird survey shall be completed by a qualified biologist no earlier than ~~one week~~ three days prior to construction activity during the nesting season (February 1 through September 15) to determine if native birds are nesting on or near the Project Area and/or staging area (including a 100-foot buffer). If the surveys conclude no active nesting, work shall resume as planned. If project activities are delayed or suspended for more than seven days during the

4 (cont.) breeding season, surveys shall be repeated prior to re-initiating work. If active nests are observed during pre-construction surveys, a suitable avoidance buffer from the nests shall be established based on the following distances: a minimum of 100 feet for general bird nests, 300 feet for sensitive bird species, and 500 feet for raptors. Reductions in buffers may be appropriate based on screening vegetation, ambient levels of human activities, or other factors as determined by the qualified biologist based on species, location, and extent and type of planned construction activity. These nests would be avoided until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist. Should removal of suitable nesting habitat (i.e., trees and vegetation) be required, it shall be conducted outside of the breeding bird season to avoid impacts to nesting birds.

Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 6 of 9

COMMENT #3: Streambed Alteration Agreement

CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. Given that the proposed Project would require the temporary diversion of a creek to install the new concrete culvert bridge, we strongly encourage the City of Escondido to consider submittal of a streambed notification package to the Lake and Streambed Alteration Program. A Notification package for a LSAA may be obtained by accessing CDFW's web site at <http://www.wildlife.ca.gov/Conservation/LSA>.

5. The City is preparing a streambed notification package for submittal to the Lake and Streambed Alteration Program for this Project.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

6. Results of Project surveys would be reported to the California Natural Diversity Database, as applicable.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of

7. Information regarding filing fees is noted. Payment of the appropriate fee would occur upon filing of the Notice of Determination within five days of adoption of the Final IS/MND.

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Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 7 of 9

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environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the City of Escondido in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Brigid Moran at Brigid.Moran@wildlife.ca.gov.

Sincerely,

DocuSigned by:
David Mayer
0700B4520375406...

David Mayer
Environmental Program Manager
South Coast Region

8

ec: CDFW
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov

OPR
State Clearinghouse – State.Clearinghouse@opr.ca.gov

USFWS
Jonathan Snyder – Jonathan.d.Snyder@fws.gov

REFERENCES

California Environmental Quality Act (CEQA). California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

California Office of Planning and Research. 2009 or current version. CEQA: California Environmental Quality Act. Statutes and Guidelines, § 21081.6 and CEQA Guidelines, § 15097, §15126.4(2).

8. Contact information and references are noted.



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Jay Paul
 City of Escondido Planning Division
 June 23, 2023
 Page 8 of 9

ATTACHMENT A: Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) or Recommendation (REC) Description	Implementation Schedule	Responsible Party
<p>MM 1: CDFW recommends that MM BIO-1 be modified as follows (suggestions in strikeout and bold):</p> <p>Construction If construction must occur during the breeding season for western pond turtle (April through August), shall be avoided as feasible. Within one week prior to any construction activities, preconstruction surveys shall be performed by a qualified biologist within the Project Area and staging area (including a 50-foot buffer) to determine whether western pond turtles or active western pond turtle nests are present. If active nests are present, they shall be flagged and avoided until the eggs have hatched or they are no longer active, as determined by the qualified biologist. To avoid impacts to western pond turtle, construction shall not occur within 50 feet of an active nest site (burrow). Prior to Project activities, exclusionary fencing shall be used to ensure western pond turtles are kept out of the construction area. This fencing will be maintained throughout the duration of construction. The integrity of the exclusion fencing will be checked daily by a Biological Monitor. Additionally, a Biological Monitor will check the work area every morning before construction begins to ensure that no turtles are within the exclusion area. If a western pond turtle individual or nest is observed in the impact area, construction activities will stop until the Biological Monitor establishes an appropriate buffer, or the turtle is no longer in the impact area. A qualified biologist (with pond turtle</p>	<p>Before and during Project activities</p>	<p>City of Escondido</p>

9. As noted above in responses to comments 3 and 4, the MMRP includes the revised mitigation measures BIO-1 and BIO-2 as recommended by CDFW. The project MMRP is included as Appendix F to the Final IS/MND.

9

DocuSign Envelope ID: 90886F30-132D-4B2C-BEBC-5131B3D2762D

Jay Paul
City of Escondido Planning Division
June 23, 2023
Page 9 of 9

9
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<i>trapping/handling experience and holding a CDFW Scientific Collecting Permit) may relocate western pond turtles to an appropriate nearby location if necessary. Relocation areas shall be approved by CDFW prior to relocation of any turtles.</i>		
REC 1: CDFW recommends that preconstruction nesting bird surveys be conducted no more than three days prior to construction activities, including vegetation removal. If nesting birds are detected during surveys, CDFW recommends that buffers be established around nest sites with the following distances: a minimum of 100 feet for birds, 300 feet for sensitive bird species, 500 feet for raptors.	Before and during Project activities	City of Escondido



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1.0 Introduction

1.1 INITIAL STUDY INFORMATION SHEET

1. Project title: Eagle Scout Lake Bridge Replacement Project, City Case No. PL23-0033
2. Lead agency name and address: City of Escondido, 201 North Broadway, Escondido, CA 92025
3. Contact person and phone number: Jay Paul, Senior Planner, (760) 839-4537, jpaul@escondido.org
4. Project location: Kit Carson Park, 3341 Bear Valley Parkway Escondido, California 92025
5. General plan designation: Public Lands/Open Space
6. Zoning: Open Space/Parks (OS)

7. Description of project:

Kit Carson Park (Park) is located in the City of Escondido (City) at 3341 Bear Valley Parkway, within Assessor's Parcel Numbers (APNs) 271-030-12-00 / 760-170-44-00, 760-244-37-00 and others (see Figure 1, *Regional Location*, Figure 2, *USGS Topography*, and Figure 3, *Aerial Photograph*). The Park is approximately 285 acres, including open space, public amenities, and parking areas. The Park has three ponds, one of which is the centrally located Eagle Scout Lake. The Arroyo Del Oro tributary of Kit Carson Creek is an open channel drainage that conveys runoff from the north end of the Park and flows south through the Park terminating at Eagle Scout Lake. The existing culvert crossing bridge where Arroyo Del Oro Creek enters Eagle Scout Lake supports heavy pedestrian use and provides access for City maintenance trucks working in the Park. Over time, the existing culvert bridge has been undermined by heavy creek flows, exposing the existing culvert that transports water under the crossing to Eagle Scout Lake, as well as exposing the fiber optic and recycled water lines beneath the structure. Portions of the path adjacent to the channel have collapsed and consequently have been closed for use to ensure public safety.

Eagle Scout Lake (formerly named Sand Lake) was intended to function as a sedimentation (desilting) pond for the upstream watershed. To function properly, Eagle Scout Lake and the existing Arroyo Del Oro Creek culvert bridge crossing requires regular maintenance to remove accumulated sediment and debris to allow flow within the culvert to the lake. The purpose of the proposed Project is to design and construct a new culvert bridge to replace the existing damaged crossing and address hydraulic deficiencies with the current design. The new structure would improve safety for Park patrons by repairing the crossing and associated path for pedestrian use and incorporating handrails that complement existing handrails on nearby crossings. The design provides for City personnel to easily conduct maintenance activities for desilting and for access to the reclaimed water and fiber optic lines. The crossing's integrated maintenance features would improve safety for City operations personnel responsible for regular facility maintenance.

The Project is located within a 0.33-acre Project Area where replacement of the existing culvert bridge, relocation of existing utilities, regrading of the drainage channel, and repair/replacement of the pedestrian crossing over the culvert would occur. A site plan and perspective view of the proposed bridge, culvert, and relocated utilities are shown in Figure 4, *Site Plan*, and Figure 5, *Perspective View of Replacement Bridge*. The Project would remove the existing damaged 72-inch by 44-inch corrugated steel oval “squash” pipe (measuring 17 feet in length) and construct a new cast-in-place, double cell, 34-foot long by 1620-foot wide, 5-foot-tall concrete box culvert. All existing concrete would be removed. Existing riprap on the north side of the bridge would be removed, salvaged, and re-installed after channel grading to improve flow. A portion of an existing 18-inch-diameter reclaimed water line and a 4-inch-diameter polyvinyl chloride (PVC) fiber optic conduit located in the vicinity of the existing culvert would be removed and relocated to the southerly side of the new bridge.

During construction, the Arroyo Del Oro Creek would need to be re-routed. This may be accomplished by dewatering activities utilizing temporary berms (e.g., gravel bag or earthen berms) and gas-powered portable pump equipment. A dewatering plan would be prepared pursuant to the California Stormwater Best Management Practices (BMP) Handbook, as well as City and Regional Water Quality Control Board (RWQCB) requirements and would be submitted for approval by the City prior to construction. The plan would identify the dewatering methodology to be utilized, sediment controls and BMPs to be implemented, and inspection and maintenance requirements.

Construction staging and site access would be located largely within existing parking areas and along existing asphalt-paved roadways within the Park. The Construction Contractor would also be granted access along some existing earth roadways within the Park. The Project Area can be accessed via Casteneda Drive from Las Palmas Avenue and Entrance Drive from Bear Valley Parkway, with regional access from Interstate 15 (I-15) to the west of the Park. The Project location, extent, and access is displayed on Figures 2 and 3.

BMPs would be specified on construction plans and implemented during construction for stormwater pollution prevention and dust control, pursuant to the City’s Municipal Code and RWQCB standards. Stormwater and erosion control BMPs may include, but are not limited to:

- Use of biodegradable straw wattles free from weed seed, silt fencing, hydroseeding, and/or fiber blankets/bonded fiber matrix on slopes and/or exposed soil.
- Installation of storm drain inlet protection at on-site storm drain inlets and desiltation basins at drainage outlets during grading.
- Protection and stabilization of all active and inactive slopes and eroded areas prior to rain events.
- Implementation of erosion prevention measures such as lining and installing velocity check dams at regular intervals at unpaved channels.
- Street sweeping vehicles with vacuums and water tanks to keep paved areas free of dirt and/or construction debris.

During grading activities, the on-site construction superintendent would ensure implementation of standard BMPs to reduce the emissions of fugitive dust. Such measures may include, but are not limited:

- Utilize water trucks and other equipment to minimize airborne dust created from grading and hauling or excessive wind conditions. 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.
- Cover stockpiles at the end of each working day and prior to forecasted rain with plastic or equivalent material, to be determined by the on-site construction superintendent, or spray them with a non-toxic chemical stabilizer.
- Operate all vehicles on the construction site at speeds less than 15 miles per hour (mph).

Project construction is anticipated to begin in fall of 2023 with demolition of the existing damaged culvert. Construction of the Project is expected to occur over a period of nine months and is anticipated to be completed around Summer/Fall of 2024. Construction activities include demolition, riprap removal, grading, installation of underground infrastructure and utilities, and construction of the culvert. Grading is estimated to require approximately 50 cubic yards of cut and 40 cubic yards of fill; the 10 cubic yards of excess material is expected to be distributed within the Study Area. Construction equipment expected to be utilized during demolition and construction includes a backhoe, front-loader, excavator, concrete breaker, dump trucks, equipment trucks, air compressors, hydraulic pumps, concrete boom pump trucks, and concrete delivery trucks.

8. Surrounding land uses and setting:

The Project is located within Kit Carson Park in the City of Escondido within San Diego County (County). Eagle Scout Lake is centrally located within Kit Carson Park just west of the parking area and Castaneda Drive (see the Study Area delineated on Figure 3). Regional access to the Park is provided by I-15, which runs in a north-south direction approximately 0.5-mile west of the Project area. The Project is located within the San Dieguito River watershed. The Arroyo Del Oro tributary of Kit Carson Creek is an intermittent, seasonally flooded streambed that drains through the Project Area into the northern portion of Eagle Scout Lake. A second drainage, Kit Carson Creek, also flows into Eagle Scout Lake to the southeast. In high water conditions, Eagle Scout Lake overflows into wetland areas in the southern portion of the Park. Flow from the Lake enters Lake Hodges from a tributary and associated wetlands approximately 2.5 miles southwest of the Project Area, and then eventually to the San Dieguito River approximately 7 miles to the southwest of the Project Area at the Lake Hodges Dam.

Approximately 100 acres of Kit Carson Park are developed for recreational use, including playgrounds; picnic areas; baseball, softball and soccer fields; tennis courts; hiking trails; and a 17-hole frisbee golf course. Other amenities at the Park include an outdoor amphitheater and a 5-acre arboretum. The area immediately surrounding the Project Area is relatively undeveloped; however, it is subject to human disturbance on a regular basis, as the public has access to walking trails and Eagle Scout Lake. Four vegetation communities were mapped within the Study Area but

outside of the Project Area, including southern cottonwood-willow riparian forest, southern willow scrub, coast live oak woodland, and non-native grassland. The majority of the Study Area (approximately 28.5 acres), including the 0.33-acre Project Area, consists of developed or disturbed land cover, including roads, play structures, parking lots, picnic areas, landscaped areas planted with ornamental vegetation, frisbee golf course, and the shore of Eagle Scout Lake. Structures within the larger Study Area include two restrooms and a children's play area along Castaneda Drive, and several picnic shelters within the Park, including two near the proposed construction location. Elevations throughout the Study Area vary between approximately 380 and 425 feet above mean sea level (AMSL). The Study Area is situated within the 7.5-minute U.S. Geological Survey (USGS) Escondido quadrangle (see Figure 2).

The areas surrounding the Study Area are primarily urban and developed with residential, recreational, commercial, and institutional uses. Adjacent land uses include the Westfield North County commercial development to the southwest; the Vineyard at Escondido golf course to the southeast; San Pasqual High School, The Classical Academy charter school, church, and residential development to the east; Bear Valley Middle School, L.R. Green Elementary School, and residential development to the north; and residential development to the east.

9. 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; Construction General Permit), as well as related City requirements for storm water and erosion control.

A jurisdictional delineation of the Project Area concluded that two aquatic features within the Delineation Area would be jurisdictional per the California Department of Fish and Wildlife (CDFW) in the context of California Fish and Game Code Section 1602, the RWQCB in the context of Section 401 of the Clean Water Act (CWA), and the United States Army Corps of Engineers (USACE) in the context of Section 404 of the CWA. These two features, Arroyo Del Oro Creek and Eagle Scout Lake, are hydrologically connected to Lake Hodges and the San Dieguito River. Potential impacts to these aquatic resources would require authorization from these regulatory agencies via the following regulatory permits: CDFW Streambed Alteration Agreement permit (Section 1602), USACE Section 404 permit, and RWQCB 401 Water Quality Certification.

10. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with the requirements of Assembly Bill (AB) 52, the City sent notification to five Native American Tribes traditionally and culturally affiliated with the Project area on February 8, 2023. Please see Section XVIII of the Initial Study Environmental Checklist for more detail.

1.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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.

JPaul

Signature

Jay Paul, Senior Planner

Printed Name

May 22, 2023

Date

City of Escondido

For

2.0 Environmental Initial Study Checklist

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).

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.

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.

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

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.

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Scenic vistas are defined as views or vistas generally expansive or panoramic in nature, usually from an elevated point or open area, which possess visual and aesthetic qualities of high value to the community. For purposes of this analysis, a substantial adverse effect on a scenic vista or view would occur where the majority of an existing view would be blocked or substantially interrupted. 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. Views within the park may be affected during the approximately nine-month construction period; however, visual impacts would be temporary, limited to the area immediately surrounding the Project area, and would not substantially block or otherwise affect scenic views. The post-construction conditions would be consistent with, if not elevated from, the existing conditions. The proposed culvert bridge would be more aesthetically pleasing than the current collapsing culvert bridge and constructed within the same footprint. The trees surrounding the Project site would be protected in place and would not be removed. 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?

Less Than Significant Impact. State scenic highways are those highways that are either eligible for designation or officially listed by the California Department of Transportation (Caltrans) in the California Scenic Highway Program. There are no officially designated or eligible state scenic highways within the

vicinity of the Project (Caltrans 2011). The two closest eligible state scenic highways (not officially designated) are I-5, located approximately 14 miles west of the Project Area, and State Route (SR-) 76, located approximately 16 miles to the northwest.

There are no rock outcroppings or other such topographic features within the Project Area. The proposed Project would not impact historic buildings (see Section V for details on historical resources). The trees surrounding the Project Area would be protected in place and would not be removed. Therefore, no substantial damage to scenic resources with a state scenic highway would occur, and impacts would be less than significant.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?

Less Than Significant Impact. CEQA defines the term urbanized area to mean, among other things, an incorporated city that has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons (Public Resources Code Section 21071). The proposed Project is within Kit Carson Park, an approximately 285-acre City managed park, with 100 acres developed for recreational use. The Park is located within the City of Escondido, which is considered an urbanized area with a population of approximately 153,000 people based on 2020 population estimates (San Diego Association of Governments [SANDAG] 2021). The Park is zoned as Open Space/Parks (OS). The Project proposes to replace an existing culvert bridge within the Park and would not introduce new uses that would conflict with the underlying zoning or other regulations governing scenic quality. Impacts would be less than significant.

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

Less Than Significant Impact. The proposed Project does not include operational lighting. Construction of the Project would occur during the day when no lighting would be needed. Should it be determined that temporary construction lighting is needed, lighting 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. Temporary lighting would be required to be shielded and oriented downward to minimize light spill. 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. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 (CARB). Would the Project:

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

No Impact. The California Department of Conservation’s Farmland Mapping and Monitoring Program maps identify the Project Area as “Other Land” (CDC 2017). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs on or near the Project Area. The Project Area is within an existing public park and operations of the Project would be consistent with existing conditions. The Project Area 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 Area is not zoned for agricultural use and no Williamson Act Contract lands are located on or near the Area. 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. There is no land zoned as forest land or timberland within the Project Area or vicinity. Therefore, the Project would not conflict with existing zoning for forest land or timberland. No impact would occur.

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

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

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The Project Area 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 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 was initially adopted in 1992 and last updated in 2016. 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 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 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. If a project proposes development that is less dense than anticipated within the applicable general plan, the project would likewise be consistent with the RAQS.

The Project involves minor construction within Kit Carson Park and replaces an existing culvert bridge. The Project would not conflict with the current zoning of the Project Area (OS) and would be consistent with the General Plan and the SANDAG growth projections identified for the City in the 2016 RAQS. Development consistent with the General Plan would be consistent with the RAQS and 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?

Less Than Significant Impact. The screening thresholds for air quality impacts are established in the Escondido Municipal Code Chapter 33, Article 47, referred to as the Environmental Quality Regulations (EQR). The EQA implement CEQA and the CEQA Guidelines by applying the provisions and procedures contained in CEQA to projects proposed in Escondido (City 2013a). If a project proposes development that would exceed the City's Daily Emissions Screening Level Criteria identified in Section 33-924(a)(5) of the EQR, 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. The Project does not propose

habitable structures and is consistent with the current General Plan land use designation. Nevertheless, anticipated Project emissions were quantified to further demonstrate consistency with the EQR screening thresholds for air quality.

The Project’s criteria pollutant emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 (South Coast Air Quality Management District [SCAQMD] 2020). 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 published in the EQR, as derived from the SCAQMD’s thresholds. 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.

Construction Emissions

Construction activities associated with the Project would generate short-term emissions of reactive organic gasses (ROGs), 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, material delivery vehicle exhaust, re-entrained paved road dust, and fugitive dust from land clearing/grading. Short-term air pollutant emissions would be generated during the entirety of construction. Construction is expected to begin July 2023 and require approximately nine months 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 2020.4.0 are provided in Appendix A of this IS/MND. The results of the air pollutant emissions calculations for Project construction activities are shown in Table 1, *Estimated Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the City’s EQR Screening Level Criteria. 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 BMPs for dust control would be incorporated as a matter of Project design and in accordance with the EQR.

**Table 1
 ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**

Construction Activity	Pollutant Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grading 2023	0.95	7.29	10.47	0.02	0.46	0.35
Grading 2024	0.91	6.79	10.44	0.02	0.42	0.32
Maximum Daily Emissions	0.95	7.29	10.47	0.02	0.46	0.35
EQR Screening Level Criteria	75	250	550	250	100	55

Source: CalEEMod (model output data is provided in Appendix A; HELIX 2022a); significance thresholds based on the Escondido Municipal Code (City 2022).

ROG= reactive organic gases; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter; EQR = Environmental Quality Regulations

As shown in Table 1, emissions of all criteria pollutants would be below the maximum daily thresholds during construction. 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. As noted in the Project Description in Section 7 of this IS/MND, standard BMPs required for development within the City's planning area boundary would be implemented during grading activities to reduce the emissions of fugitive dust. Therefore, 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 emissions would cease upon completion of construction, and impacts would be less than significant.

Long-term Operational Emissions

Long-term air pollutant emissions would be attributed to mobile source emissions generated from Project-related traffic and stationary source emissions related to maintenance of the culvert bridge. Once operational, the new culvert bridge would have the same usage and function as the existing culvert bridge and would not result in an increase in traffic or associated changes to emissions compared to existing conditions. 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 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). The closest sensitive receptors to the Project Area include San Pasqual High School and single-family residences located approximately 0.3 mile east of the Project Area and L.R. Green Elementary School and Bear Valley Middle School located approximately 0.4 mile north of the Project area. An analysis of the Project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hotspots

Localized air quality effects can occur when emissions from vehicular traffic increase in local areas. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle idling time and, thus, traffic flow conditions. CO transport is extremely limited—it disperses rapidly with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. If a project generates vehicular traffic that 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, the project could result in significant CO hotspot-related effects to sensitive receptors.

Due to the proposed Project being a replacement culvert bridge within a City park, Project operations would have the same usage and function as existing conditions. As a result, the Project is not anticipated to generate a substantial number of trips such that the local roadway network would be adversely affected, and a Local Mobility analysis was deemed not necessary for the proposed Project (see Section XVII). Therefore, the Project would not have the potential to result in a CO hotspot. Impacts would be less than significant.

Exposure to Diesel Particulates

Diesel engines emit a complex mixture of air pollutants, including gaseous material and DPM. DPM emissions would be released from operation of the on-site construction equipment used for Project construction. CARB has declared that DPM from diesel engine exhaust is a toxic air contaminant (TAC). Additionally, the Office of Environmental Health Hazard Assessment has determined that chronic exposure to DPM can cause carcinogenic and non-carcinogenic health effects. For this reason, although other pollutants would be generated, DPM would be the primary pollutant of concern.

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 are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment, health risk assessments (HRAs), which determine the exposure of sensitive receptors to TAC emissions, should be based on a 30-year exposure period. However, such assessments should be limited to the period/duration of activities associated with a project.

There would be few pieces of off-road, heavy-duty diesel equipment operating at a given time during Project construction, and the construction period would be relatively short, especially when compared to 30 years. In addition, as shown above in Table 1, the highest daily emission of PM₁₀ (which includes equipment emissions of DPM) during construction is estimated to be approximately 0.46 pounds per day, which would be well below the 100 pounds per day significance level threshold. As discussed above in Section III(b), these significance level thresholds were developed with the purpose of attaining the NAAQS and CAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Combined with the highly dispersive properties of DPM, construction-related emissions would not expose sensitive receptors to substantial emissions of TACs. Impacts would be less than significant.

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

Less Than Significant Impact. The Project could produce odors during construction activities resulting from minor amounts of odor compounds associated with heavy diesel equipment exhaust and ROG. Emissions would disperse rapidly from the Project Area, reducing the effects of odors to the immediate vicinity. Standard BMPs to minimize equipment idling and maintain equipment would minimize the odor emissions from equipment exhaust and their associated impacts. Odors emitted during construction activities would be temporary, short-term, and intermittent in nature, and would cease upon completion of construction. Operation of the Project is not anticipated to result in emissions of objectionable odors. Therefore, odor impacts from implementation of the Project would be less than significant.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Biological Resources Assessment (BRA) for the Eagle Scout Lake Bridge Project prepared by Kleinfelder (Kleinfelder 2021a) and included as Appendix B to this IS/MND. The BRA evaluates a biological study area (BSA) that includes the approximately 0.33-acre Project Area, 0.54-acre staging area, and 4.91 acres of access roads (all of which are existing in the Park), including an area of potential effect (APE) buffer extending 100 feet around these areas. Within the Project Area, a total of 0.02-acre of permanent impacts would occur due to removal and replacement of the old culvert, and a total of 0.31-acre of temporary impacts would occur due to removal of excess sediment around the culvert, contractor equipment access, and removal and replacement of rip rap within the creek. The extent of the BSA can be found in Figure 6, *Vegetation Communities and Potentially Jurisdictional Features*. 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?

Less Than Significant Impact with Mitigation Incorporated. The BRA investigated the potential impacts to special status plant and wildlife species in the vicinity of the Project Area resulting from implementation of the Project. Special status species include those that have been afforded special status and/or recognition by federal or state resource agencies, as well as the California Native Plant Society (CNPS) for plant species (CNPS 2021). In general, the principal reason an individual taxon (species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution resulting in most cases from habitat loss. Although threatened and endangered species are protected by specific federal and state statutes, CEQA Guidelines Section 15380(b) provides that a species not listed on the federal or state list of protected species may be considered rare or endangered if the species can be shown to meet certain criteria. These criteria have been modeled after the definition in the federal Endangered Species Act and the section of the California Fish and Game Code dealing with rare or endangered plants and animals, and allows a public agency to undertake a review to determine if a significant effect on a species that has not yet been listed by either the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW) (i.e., species of special concern) would occur. A summary of the status of sensitive species within the Project Area and vicinity, as well as potential impacts to these species, is presented below.

Special-status Wildlife Species

Special-status wildlife species include taxa designated as follows:

- Threatened, endangered, or candidate for listing under federal Endangered Species Act;
- Threatened, endangered, or rare under the California Endangered Species Act; and/or
- CDFW species of special concern or fully protected species.

As documented in the BRA prepared for the Project (Appendix B), there are 30 special-status wildlife species known to occur within a two-mile search radius of the BSA (CDFW 2021; USFWS 2021). Of these 30 species, 24 species are not expected to occur or have a low potential to occur within the Project BSA due to a lack of suitable habitat, or the site is outside of the species' known range. The remaining six special-status wildlife species were determined to have a moderate or greater potential to occur within the Project Area. These species include the western pond turtle (*Emys marmorata*), southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's vireo (*Vireo bellii pusillus*), coastal California gnatcatcher (*Polioptila californica californica*), pallid bat (*Antrozous pallidus*), and the western yellow bat (*Lasiurus xanthinus*). Additional details on each of these species, such as their typical habitats and observed occurrences within the Project vicinity, are provided in the BRA (Kleinfelder 2021a).

Only one sensitive wildlife species is known to be present within Eagle Scout Lake and was observed during the surveys conducted in 2021—a western pond turtle was observed basking on the shore of Eagle Scout Lake (Kleinfelder 2021a). Western pond turtles are also known to occur in the vicinity of the Project Area, upstream and downstream of Lake Hodges. They are known to nest up to 325 feet from suitable aquatic sites. The Project has the potential to impact western pond turtle habitat and individuals during construction of the culvert bridge; impacts occurring during the breeding season

would be significant. With the implementation of mitigation measure **BIO-1**, potential impacts to western pond turtle would be avoided or reduced to below a level of significance.

No other sensitive wildlife species were found to be present within the BSA during Project surveys. Four common bird species were detected during the field survey competed by Kleinfelder (Appendix B), including American crow (*Corvus brachyrhynchos*), acorn woodpecker (*Melanerpes formicivorus*), mourning dove (*Zenaida macroura*), and a possible audible detection of coastal cactus wren (*Campylorhynchus brunneicapillus*). In addition, several California ground squirrels (*Otospermophilus beecheyi*) and associated burrows were observed during the field survey. No common or special-status amphibians were detected during the field survey. Red-eared sliders (*Trachemys scripta elegans*) and painted turtles (*Chrysemys picta*) were also observed during the biological and jurisdictional field surveys.

As noted above, although no sensitive avian species were observed within the BSA, there is suitable riparian habitat for federally and state listed bird species adjacent to the Project Area, including southwestern willow flycatcher and least Bell's vireo, which are federally and state listed as endangered; and coastal California gnatcatcher, which is federally listed as threatened. In addition, critical habitat has been mapped for coastal California gnatcatcher within the BSA. A significant impact to these species may occur if removal of riparian habitat or construction during the breeding season would be required. All native birds in California are protected by the federal Migratory Bird Treaty Act (MBTA) and provisions of the California Fish and Game Code. Section 3503.5 of the California Fish and Game Code specifically protects raptors. Ground disturbance, noise, or removal of vegetation that would result in destruction of active bird nests or disruption of breeding/nesting activity could be a violation of the MBTA and the California Fish and Game Code, as well as a significant impact. The Project does not require removal of riparian habitat, therefore, no direct impacts to suitable habitat of sensitive avian species would occur. Implementation of mitigation measure **BIO-2**, which details breeding season avoidance measures, would reduce potential impacts associated with nesting birds to below a level of significance.

Another potential impact to special-status species may occur due to increased predation resulting from construction activities. Predators such as raccoons and American crows may be attracted to trash at the construction site, increasing the likelihood of impacts to sensitive wildlife species they may prey upon. Implementation of mitigation measure **BIO-3**, which requires the use of covered trash receptacles, would reduce potential impacts to below a level of significance.

Finally, suitable roosting and foraging habitat for two special-status bat species—pallid bat and western yellow bat—occurs within the BSA. Foraging habitat for western yellow bat includes open areas within and adjacent to the BSA; roosting could potentially occur within coast live oak woodlands and buildings within the BSA. For pallid bat, foraging and roosting habitat includes southern cottonwood-willow riparian forest and palm trees within the southern willow scrub in the BSA. Current plans do not require removal of trees within or adjacent to the Project Area. Should removal of trees be required to construct the Project, implementation of mitigation measure **BIO-4** would be required to reduce potential impacts to special-status bat species to below a level of significance.

Special-status Plant Species

Special-status plant species include taxa designated as follows:

- Threatened, endangered, or candidate for listing under the Federal Endangered Species Act (FESA);
- Threatened, endangered, or rare under the California Endangered Species Act; and/or
- Species with California Rare Plant Rankings as described below (CNPS 2021):
 - 1A – Plants presumed extinct in California;
 - 1B – Plants considered rare, threatened, or endangered in California and elsewhere; or
 - 2 – Plants considered rare, threatened, or endangered in California, but more common elsewhere.

As documented in the BRA (Appendix B), there are 19 special-status plant species known to occur within the two-mile search radius of the BSA (CDFW 2021, USFWS 2021, and CNPS 2021). Although there is potentially suitable habitat for three of these species in the marshy areas on the eastern side of the staging area, none of these species are expected to occur within the Project Area, staging area, or access roads due to the developed nature of these areas. Similarly, the remaining 16 species have a low potential to occur or are not expected to occur due to a lack of suitable habitat, a lack of occurrences in the vicinity of the Project Area, or the Project Area is outside of the species' known range. Therefore, impacts to special-status plant species would be less than significant.

Mitigation Measures

- BIO-1** ~~If construction must occur during the breeding season for western pond turtle (April through August) shall be avoided as feasible. Within one week prior to any construction activities that may occur during the breeding season, pre-construction surveys shall be performed by a qualified biologist within the Project Area and staging area (including a 50-foot buffer) to determine whether western pond turtles or active western pond turtle nests are present. If active nests are present, they shall be flagged and avoided until the eggs have hatched or they are no longer active, as determined by the qualified biologist. To avoid impacts to western pond turtle, construction shall not occur within 50 feet of an active nest site (burrow). Prior to project activities, exclusionary fencing shall be used to ensure western pond turtles are kept out of the construction area. This fencing will be maintained throughout the duration of construction. The integrity of the exclusion fencing will be checked daily by a Biological Monitor. Additionally, a Biological Monitor will check the work area every morning before construction begins to ensure that no turtles are within the exclusion area. If a western pond turtle individual or nest is observed within the impact area, construction activities will stop until the Biological Monitor establishes an appropriate buffer, or the turtle is no longer in the impact area. A qualified biologist (with pond turtle trapping/handling experience and holding a CDFW Scientific Collecting Permit) may relocate western pond turtles to an appropriate nearby location if necessary. Relocation areas shall be approved by CDFW prior to relocation of any turtles. Prior to construction upslope of or within an intermittent stream or pond area located within the BSA, BMPs shall be installed to prevent runoff, siltation, or hazardous materials from entering these aquatic features. These BMPs shall include, but are not limited to, biodegradable straw waddles free from~~

~~weed seed, silt fencing, hydroseeding, and/or biodegradable erosion control mats/blankets. Specific BMPs shall be defined and approved by the City prior to construction to ensure adequate protection of these aquatic features. Spill kits shall be available during construction activities in the event of an accidental hazardous materials release.~~

- BIO-2** In order to avoid violation of the federal Migratory Bird Treaty Act and California Fish and Game Code, construction activities shall occur outside of the general avian breeding bird season (September 16 through January 31) to avoid impacts to native nesting birds. If construction must occur during the nesting season, a nesting bird survey shall be completed by a qualified biologist no earlier than ~~one week~~ three days prior to construction activity during the nesting season (February 1 through September 15) to determine if native birds are nesting on or near the Project Area and/or staging area (including a 100-foot buffer). If the surveys conclude no active nesting, work shall resume as planned. If project activities are delayed or suspended for more than seven days during the breeding season, surveys shall be repeated prior to re-initiating work. If active nests are observed during pre-construction surveys, a suitable avoidance buffer from the nests shall be established based on the following distances: a minimum of 100 feet for general bird nests, 300 feet for sensitive bird species, and 500 feet for raptors. Reductions in buffers may be appropriate based on screening vegetation, ambient levels of human activities, or other factors as determined by the qualified biologist based on species, location, and extent and type of planned construction activity. These nests would be avoided until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist. Should removal of suitable nesting habitat (i.e., trees and vegetation) be required, it shall be conducted outside of the breeding bird season to avoid impacts to nesting birds.
- BIO-3** To reduce predation activities during Project construction, all trash and waste items generated by construction activities shall be properly contained in a covered trash receptacle and removed from the Project Area and staging area daily.
- BIO-4** To avoid impacts to foraging and roosting pallid bats or western yellow bats, construction activities shall be limited to daylight hours (one hour after sunrise to one hour before sunset). No more than three days (72 hours) prior to removal or trimming of trees with the potential to support roosting bats, qualified biologist shall conduct a pre-construction survey to determine if there is appropriate roosting habitat within them (e.g., cavities, crevices, peeling bark, canopy) and roosting bats are present. If bats are not detected during the pre-construction survey or determined to be absent from the proposed impact area, construction activities shall be allowed to proceed, and no additional measures would be necessary. If an active maternity roost is detected during the bat maternity season (April 15 through August 15), the biologist shall flag the active roost site and construction activities shall avoid the roost site until after the maternity season (August 16), or until the qualified biologist has determined young are self-sufficiently volant (able to fly). If bats are detected and determined to be roosting within the proposed impact area outside of the bat maternity season (August 16 through April 14), the biologist shall flag the active roost site and construction activities shall avoid roost sites until bats are no longer determined to be roosting as determined by the qualified biologist. Exclusion of roost sites, where feasible, outside of the bat maternity season may be conducted with approval of CDFW. Methods of roost exclusion shall be determined in consultation with CDFW.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. Using the classifications described in *Preliminary Descriptions of the Natural Communities of California* (Holland 1986), five vegetation communities or land cover types were mapped within the Project BSA (see Figure 6). These are described in more detail below.

Southern Cottonwood-Willow Riparian Forest (1.64 acres). The areas of the BSA that are mapped as southern cottonwood-willow riparian scrub border the northern edge of the Project Area and extend northeast to Casteneda Drive along Arroyo Del Oro Creek. Dominant plant species found in the BSA that are indicative of this vegetation community include willow (*Salix* spp.), wild cucumber (*Echinocystis lobata*), wild grape (*Vitis* sp.), Fremont's cottonwood (*Populus fremontii*), giant reed (*Arundo donax*), and California mugwort (*Artemisia douglasiana*), along with mule fat (*Baccharis salicifolia*), perennial ragweed (*Ambrosia psilostachya*), and sacred datura (*Datura wrightii*). Some coast live oaks (*Quercus agrifolia*) are found along the edges of this vegetation community. Riparian habitat is typically associated with stream channels and other aquatic features such as rivers and wetlands.

Riparian habitat within the BSA is considered sensitive by CDFW in the context of California Fish and Game Code Section 1602. Impacts to riparian habitat, including trimming or removal of vegetation, would be considered potentially significant. Impacts to these features would prompt the need for regulatory authorizations and mitigation in the form of establishment, re-establishment, and/or rehabilitation or preservation of similar habitat.

Southern Willow Scrub (1.71 acres). The areas of the BSA that are mapped as southern willow scrub are found primarily adjacent to the eastern edge of the staging area and in the southeastern portion of Casteneda Drive. This vegetation community within the BSA is generally dominated by willow and Mexican palm (*Washingtonia robusta*), also mule fat, date palm (*Phoenix dactylifera*), Fremont's cottonwood, eucalyptus (*Eucalyptus* sp.), perennial ragweed, coyote bush (*Baccharis pilularis*), telegraphweed (*Heterotheca grandiflora*), bristly oxtongue (*Helminthotheca echioides*), bull thistle (*Cirsium vulgare*), wild cucumber, and saltgrass (*Distichlis spicata*). The areas mapped as southern willow scrub within the BSA had standing water at the time of the survey.

Coast Live Oak Woodland (2.45 acres). The areas of the BSA that are mapped as coast live oak (*Quercus agrifolia*) woodland are composed of dense assemblages of coast live oak, mixed in with American sycamore (*Platanus occidentalis*), perennial ragweed, and Mexican elderberry (*Sambucus mexicanus*). Non-native grasses are typically found in the understory within this vegetation community within the BSA.

Non-Native Annual Grassland (0.57 acre). The area of the BSA mapped as non-native annual grassland is adjacent to the west side of the staging area and is comprised of non-native annual grasses such as brome (*Bromus* sp.) and wild oat (*Avena* sp.).

Developed/Disturbed Land Cover (28.48 acres). The areas of the BSA that are mapped as developed/disturbed are composed of developed park facilities that provide little to no habitat value for special-status plant and wildlife species and are commonly urbanized areas that experience regular human disturbance. These areas include roads, play structures, parking lots, picnic areas, landscaped

areas planted with ornamental vegetation, a frisbee golf course, and the shore of Eagle Scout Lake (which lacks vegetation and is highly impacted by human disturbance within the Project Area).

The Project Area occurs entirely within developed/disturbed land; however, the northern edge abuts southern cottonwood-willow riparian forest habitat (Figure 6). Riparian habitat within the site is considered sensitive by CDFW in the context of California Fish and Game Code Section 1602. Although the Project has been designed to avoid and minimize impacts to jurisdictional resources to the extent practicable, potential impacts to riparian habitat, including trimming or removal of vegetation, may occur. Such impacts would be temporary, and avoidance of riparian communities would be implemented to the extent practicable while also accommodating adequate replacement of the existing culvert bridge. If avoidance is not possible, impacts to these features would prompt the need for regulatory authorizations and mitigation in the form of establishment, re-establishment, and/or rehabilitation or preservation of similar habitat. It is expected that the Project would utilize the Kit Carson Park Mitigation Area to fulfill these requirements, if necessary. Implementation of mitigation measure **BIO-5** would ensure that potential impacts to jurisdictional riparian habitat (as well as jurisdictional resources described in Section IV(c)) would be less than significant.

Mitigation Measures

BIO-5 Prior to Project impacts to potentially jurisdictional resources, demonstration that regulatory permits from the United States Army Corps of Engineers (USACE), CDFW, and San Diego Regional Water Quality Control Board (RWQCB) have been issued or that no such permits are required shall be provided to the City. Implementation of permit requirements, including additional mitigation, shall be required.

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?

Less Than Significant Impact with Mitigation Incorporated. A formal wetland delineation was performed by Kleinfelder biologist Wayne Vogler on August 25, 2021. Three aquatic features were mapped within the BSA during the field delineation that are likely under jurisdiction of the United States Army Corps of Engineers (USACE), CDFW, and the San Diego Regional Water Quality Control Board (RWQCB). Jurisdictional resources included intermittent drainages Arroyo Del Oro Creek and Kit Carson Creek and Eagle Scout Lake (a freshwater pond). These features were wet during the field survey, an ordinary high-water mark was present within the two intermittent streams, and riparian vegetation was observed along the banks of the streams.

Two features, Arroyo Del Oro Creek and Eagle Scout Lake, defined by the ordinary high water mark (OHWM) totaling 0.050 acre are potential waters of the U.S. subject to USACE jurisdiction under Section 404 of the CWA. The creek drains to Eagle Scout Lake and the lake is hydrologically connected to a tributary that flows to Lake Hodges that eventually enters the Pacific Ocean via the San Dieguito River.

Both Arroyo Del Oro Creek and Eagle Scout Lake as defined by the OHWM (0.050 acre) are subject to RWQCB jurisdiction under Section 401 of the CWA. Additional boundaries of Arroyo Del Oro Creek and Eagle Scout Lake, totaling 0.096 acre, are under state jurisdiction (CDFW) under Section 1602 of the California Fish and Game Code. This jurisdiction extends to the top of bank for both features and includes the riparian area associated with Arroyo Del Oro Creek. Table 2, *Potentially Jurisdictional Aquatic Resources*, provides details on these features.

Table 2
POTENTIALLY JURISDICTIONAL AQUATIC RESOURCES

Feature	Lat/Long Location	USACE/RWQCB Jurisdiction (acres/linear feet)	CDFW Jurisdiction (acres/linear feet)
Eagle Scout Lake – Palustrine Unconsolidated Bottom, Excavated	33°04'44.11" N; 117°03'41.35" W	0.040/ -	0.050/ -
Arroyo Del Oro Creek – Riverine Streambed, Intermittent	33°04'44.40" N; 117°03'41.13" W	0.010 / 40	0.046 / 40
Total:		0.050 / 40	0.096 / 40

Source: Kleinfelder 2021b

A project design that avoids and/or minimizes impacts to these aquatic resources under jurisdiction of USACE, RWQCB, and/or CDFW can avoid/minimize the need for compensatory mitigation requirements and resource agency permits. If avoidance is not possible, impacts to aquatic resources would require authorization from the regulatory agencies listed above in the form of regulatory permits (e.g., CWA Section 404 Nationwide Permit, CWA Section 401 Water Quality Certification, and CFGC Section 1602 Lake and Streambed Alteration Agreement). Such permits typically include measures to avoid and minimize or mitigate impacts.

Prior to construction activity occurring upslope of or within the intermittent streams and pond located in the BSA, BMPs should be installed to prevent runoff and siltation from entering these features. Such BMPs may include, but are not limited to, biodegradable straw wattles free from weed seed, silt fencing, hydroseeding, or biodegradable erosion control mats/blankets. Specific BMPs should be defined prior to construction to protect streams within the Project Area, and spill kits should be available to all workers during construction activities. Depending on the type and extent of Project activities, impacts to these resources would be considered significant. Potentially significant impacts would include removal or degradation of these habitats, as well as temporary disturbances due to dewatering activities or fill being placed into these habitats. If construction of the Project involves dewatering, a dewatering plan would also be prepared per City and RWQCB requirements and reviewed by the City. Implementation of mitigation measure **BIO-5** would ensure that potential impacts to jurisdictional resources would be less than significant.

- 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?

Less Than Significant Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as steppingstones for wildlife dispersal.

The BSA is not recognized as an important wildlife corridor by any regional or state agency or jurisdiction and is not considered critical to the ecological functioning of adjoining open space areas. However, because the BSA includes a portion of Arroyo Del Oro and Kit Carson creeks that are bordered by riparian habitat, it does provide value as a corridor that supports movement between similar patches of riparian habitat north and south of the BSA. The creek corridor likely supports local movement patterns of riparian wildlife species for foraging, cover, and shelter areas. No raptor nests or wildlife dens were

observed during the field surveys (Kleinfelder 2021a). Common wildlife species adapted to life in proximity to human development, such as raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*) are likely to move through the BSA on a regular basis for food and cover. Common native and non-native bird species also are likely to use the BSA for nesting and foraging. Temporary effects due to noise and increased human activity during Project construction activities would not adversely interfere with these local movement patterns or affect the ability of these species to forage or reproduce in the long term. Impacts would be less than significant.

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

Less Than Significant 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 would not remove any existing trees; one tree located within the Project footprint would be protected in place. In the unexpected event that trees would be required to be removed or pruned, the regulations in the Escondido Municipal Code would be adhered to by the Construction Contractor, as stipulated in the Project plans. Compliance with the requirements set forth in the Municipal Code would ensure significant impacts to ordinances protecting biological resources would not occur. Impacts would be less than significant.

- 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?

Less Than Significant Impact. The Project Area 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 Area occurs entirely within a public park. Impacts to sensitive biological resources would be avoided as part of the Project or mitigated if avoidance is not feasible, as discussed in Sections IV(a) through IV(e). Kit Carson Park is located within the Hardline Focused Planning Area (HFPA) according to the Draft MHCP. For projects within the HFPA, the area that has been developed or is approved for development is outside the preserve, while the open space area is in the preserve and is conserved at 90 to 100 percent (depending on the types of approved activities). Although this Project would have minor impacts to biological resources, Project operations would be consistent with existing conditions, and the current zoning and usage of the Project Area. 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. Impacts would be less than significant.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Cultural Resources Identification Report (CRIR) completed by Kleinfelder in September of 2021 (Kleinfelder 2021c) and included as Appendix C to this ISMND. Would the Project:

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

Less Than Significant Impact. Under 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 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 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.

According to the CRIR completed by Kleinfelder (Appendix C), cultural resources literature search through the California Historical Resources Information System (CHRIS) records search of the area of potential effect (APE) and a 0.25-mile buffer was conducted by the South Coast Information Center (SCIC) on July 6, 2021. Six previously recorded cultural resources on file with the SCIC were identified within a quarter of a mile of the APE, no resources were found to be located within the APE. The results also identified two previously recorded archaeological sites that were mapped outside the APE, which

include P-37-000571/CA-SDI-000571 (habitation debris) and P-37-018684 (chimney). Additionally, Kleinfelder reviewed historical maps from the United States Geological Survey (USGS) repository, Historical Aerials, and the Library of Congress, and Old Maps Online to provide additional information regarding the potential for the presence of historic-era cultural resources within the APE. No significant historical resources were identified within the Project Area.

The APE has been disturbed by development of Kit Carson Park, periodic maintenance activities, and on-going recreational use of the Park. The pedestrian survey completed on August 4, 2021, reviewed the entire APE for new and/or previously recorded cultural resources; specifically, sites P-37-000571/CA-SDI-000571(habitation debris) and P-37-018684 (chimney), which were reported outside and adjacent to the APE (based on record search results). Both resources were investigated and there was no evidence these resources exist as they were not relocated during the survey (presumably destroyed). As such, sites P-37-000571/CA-SDI-000571 and P-37-018684 are recommended not eligible for listing on the National Register of Historic Places and/or CRHR under any criteria. Additionally, the location in which both resources were previously plotted occurs outside the APE and would be avoided during Project construction. Impacts to historical resources would be less than significant.

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

Less Than Significant with Mitigation Incorporated. On August 4, 2021, Kleinfelder archaeologist, Darryl Dang, B.A., completed an intensive pedestrian survey in search of cultural resources (new and previously recorded) within the APE. The ground visibility varied between 0 and 100 percent, with the overall average being about 60 percent due to the presence of vegetation and gravel/rock in some areas of the APE. The survey resulted in no (new or previously recorded) prehistoric or historic-period cultural resources within the APE. A record search also revealed no archeological sites recorded within the Project Area. Based on the absence of recorded or observed resources within or adjacent to the Project Area, no adverse changes in the significance of an archaeological resource are anticipated; however, due to the proposed ground disturbance on site and alluvial soils beneath, it is possible that unrecognized archaeological resources may be discovered during grading and other ground-disturbing activities. Implementation of mitigation measures **CUL-1** through **CUL-10** are required to ensure that impacts to unidentified cultural resources are less than significant.

CUL-1 The City of Escondido shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Area (“TCA Tribe”) prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the City with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the City 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 City shall verify 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 Construction Contractor 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 shall 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 dedicated cemeteries?

Less Than Significant Impact with Mitigation Incorporated. No cemeteries, formal or informal, have been identified or are known to be present within the Project Area or 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 Public Resources Code 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 Public Resources Code 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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 nine months. During construction, temporary electric power for lighting (if necessary) and electric-powered tools would be provided by San Diego Gas and Electric (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 may be consumed as a result of Project construction; however, its use also would be temporary and negligible given the short construction duration and limited use. 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 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. 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 operational, the new culvert bridge would have the same usage and function as the existing culvert bridge, and therefore, would not have substantial operational emissions outside existing park maintenance. Based on these considerations, petroleum consumption associated with the Project would not be considered inefficient or wasteful, and impacts would be less than significant.

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

Less Than Significant Impact. The Project would be built in accordance with all applicable regulations governing energy usage and efficiency. State plans for renewable energy and energy efficiency include CARB’s 2017 Climate Change Scoping Plan, the 2019 California Energy Efficiency Action Plan, and the California Renewables Portfolio Standard Program. These state plans do not include regulations that would apply to a culvert bridge replacement project; therefore, the Project would not conflict with or obstruct a state plan for renewable energy or energy efficiency.

The Escondido Municipal Code contains provisions for energy efficiency, primarily focused on energy-efficient lighting, water efficient landscaping, etc. Construction activities associated with the Project would be required to comply with applicable regulations, including applicable requirements for diversion of construction and demolition debris. Accordingly, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant. Once operational, the new culvert bridge would have the same usage and function as the existing culvert bridge, and therefore would not result in new sources of energy use beyond the existing park maintenance. Accordingly, the Project would not conflict with existing energy standards or regulations, and impacts would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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. No active faults (i.e., faults that exhibit evidence of ground displacement during the last 11,000 years) are known to underlie the Project Area. The closest known active fault is the Warner’s Ranch quadrant within the Elsinore fault zone located approximately 20 miles northeast of the Project Area. The Project Area 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. The proposed culvert bridge would be designed in accordance with the minimum seismic design parameters of the California Building Code (CBC; latest edition) and applicable ASTM International specifications upon which the CBC standards are based. Accordingly, the potential for ground rupture is very low and impacts related to the exposure of people or structures to geologic hazards associated with rupture of a known earthquake fault would be less than significant.

- ii. Strong seismic ground shaking?

Less Than Significant Impact. The City, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. Ground shaking as a result of movement along an active fault in the vicinity of the Project Area has the potential to affect the integrity of the Project components. The closest known active fault is the Warner’s Ranch quadrant within the Elsinore fault zone located approximately 20 miles northeast of the Project Area. Construction of the 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. As noted on the Project plans, a Special Inspection Program would be implemented to the satisfaction of the City to provide special inspection and testing for seismic resistance as required by CBC Sections 1704 and 1705. Based on the incorporation of applicable measures into design and construction of the proposed Project, potential impacts associated with strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a process in which strong ground shaking causes soils in a saturated deposit to temporarily lose their strength and behave like a heavy fluid. This phenomenon generally occurs in areas of high seismicity where groundwater is shallow and loose granular soils or hydraulic fill soils subject to liquefaction are present. The factors known to influence liquefaction potential include soil type, relative density, grain size, confinement, depth to groundwater, and the intensity and duration of the seismic ground shaking. For liquefaction to occur, loose granular sediments below the groundwater table must be present and shaking of sufficient magnitude and duration must occur. Ground failure associated with liquefaction can result in severe damage to structures. According to the Community Protection Chapter (VI) of the Escondido General Plan, the Project Area is located within an area of potential Liquefaction Hazard (City 2012a).

Provisions to address potential impacts resulting from seismic related ground failure are included in the Project plans. As noted in Section VII(a)ii, a Special Inspection Program would be implemented to the satisfaction of the City as required by CBC Sections 1704 and 1705. A geotechnical engineer would perform an inspection to approve the footing excavations prior to construction. Findings would be submitted by the geotechnical engineer to the City. Soils removal, backfilling, and recompaction would be performed per soils report recommendations under the supervision of the geotechnical engineer's supervision and inspection. Therefore, impacts would be less than significant.

iv. Landslides?

No Impact. Landslide activity generally occurs in areas where slopes are steep (typically 30 percent or more) and lack vegetation. The Project Area and vicinity exhibit relatively flat topography; no steep slopes are located within or adjacent to the Project Area. Additionally, evidence of landslides and slope instabilities were not mapped within Figure VI-9 of the Community Protection Chapter (VI) of the Escondido General Plan (City 2012a). The potential for landslides or slope instabilities to occur within the Project Area is considered low and no impact would occur.

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

Less Than Significant Impact. Construction activities associated with grading or other ground disturbance has the potential to result in temporary erosion or sedimentation during construction. Potential short-term erosion and sedimentation impacts would be addressed through compliance with applicable regulations as specified by the RWQCB. As discussed in Section X, below, to address potential water quality impacts, the Project would comply with NPDES Municipal Separate Storm Sewer Systems (MS4) permit requirements to develop a Stormwater Quality Management Program (SWQMP), which would outline construction and permanent BMPs to be implemented, pursuant to the Escondido Storm Water Design Manual (City 2016). 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) and related storm water standards; and (3) the NPDES Construction General Permit (NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ, as amended). Specific BMPs would be identified during preparation of the Project's final SWQMP. Construction stormwater BMPs are required to be shown on the Project grading plan and would be provided in the Storm Water Pollution Prevention Plan (SWPPP) for the Project.

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 Construction Site Monitoring Program (CSMP), and, if applicable, a Rain Event Action Plan (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.

Construction of the proposed Project would require the temporary diversion of the active creek to install the concrete culvert bridge. Methods to divert the creek may include temporary gravel bag berms, portable pump equipment, temporary pipe siphons, and earthen berms. Prior to construction, a creek diversion plan would be prepared in accordance with RWQCB requirements and submitted to the City for review. If construction of the Project involves dewatering, a dewatering plan would also be prepared per City and RWQCB requirements and reviewed by the City. The plan would include sediment controls and BMPs to address sedimentation, as well inspection and maintenance requirements.

The proposed Project design would include structural BMPs to manage operational and construction erosion. The Project would include storm drain inlet protection that would be installed at on-site storm drain inlets. This would prevent sediment from entering the storm drain system. Desiltation basins would also be included at drainage outlets from the graded site, where feasible. Additionally, erosion control measures would be implemented on slopes and exposed soil utilizing BMPs. These BMPs include installing fiber blankets and bonded fiber matrix, installing new vegetation, and/or maintaining existing vegetation. Eroded areas would be immediately repaired and stabilized, while inactive slopes would be protected and stabilized. All exposed soils including active and inactive slopes would be protected prior to rain events. Unpaved gravel channels would implement erosion prevention measures such as lining and installing velocity check dams at regular intervals. As described in Section X(a), below, 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.

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 less than significant.

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

Less Than Significant Impact. As discussed above in Section 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 Area. The site is, however, susceptible to liquefaction events, as discussed in Section VII(a)iii. To avoid potential impacts resulting from seismic related ground failure or other possible geologic impacts, a geotechnical engineer would perform an inspection to approve the footing excavations prior to construction. Findings would be submitted by the geotechnical engineer to the City. The Project would implement all necessary recommendations contained in the soils report. 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, 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 effects from unstable soils. Impacts would be 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?

Less than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or pavements supported on grade. The Project Area is underlain mostly by Chino silt loam, as well as a small portion of Ramona sandy loam on the northwestern side of the Project Area (Kleinfelder 2021b). Chino silt loam is a moderately well-drained, slightly to moderately saline alluvium derived from granite, found on alluvial fans. Ramona sandy loam is a well-drained alluvium derived from granite, also found on alluvial fans. Loam and sandy loam soils typically have a low clay content (below 30 percent). Accordingly, on-site soils are expected to have a very low expansion potential based on low clay content. The geotechnical engineer would perform an evaluation of on-site soils and submit the findings to the City. The Project would implement all necessary recommendations contained in the soils report. Therefore, impacts would be less than significant.

- 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?

No Impact. The Project 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?

No Impact. Impacts to paleontological resources generally occur from the physical destruction of fossil remains by excavation operations that cut into geologic formations. The potential for significant impacts to paleontological resources to occur is based on the extent that a geologic formation would be

disturbed and the potential for those geologic formations to contain fossils. The Project Area is underlain by artificial fill and undifferentiated surficial deposits. The surrounding areas are underlain by mid-Cretaceous granitic rock (Escondido 2012b). According to the County of San Diego Guidelines for Determining Significance for Paleontological Resources (County 2007) and Chapter 4.5, *Cultural and Paleontological Resources*, of the Escondido General Plan, Downtown Specific Plan and Climate Action Plan EIR, no resource potential for producing fossil remains is assigned to geologic formations that are composed entirely of volcanic or plutonic igneous rock, such as basalt or granite. These formations have no paleontological resource potential. Based on the Project grading plans, it is anticipated that grading would extend up to eight feet below the existing ground surface elevation. At this depth in the mapped geologic unit, grading for the Project would be unlikely to yield intact fossil resources. The Project Area has been highly disturbed by prior grading construct the existing culvert bridge and Eagle Scout Lake. Ground disturbance would be relatively shallow and may primarily encounter fill material. Therefore, the impact on paleontological resources would 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 Area does not encompass any distinct or unique geologic characteristics, information or features as described, no associated impacts would occur.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Project-specific greenhouse gas (GHG) emissions modeling was performed by HELIX Environmental Planning Inc. (HELIX) and is included as Appendix A to this IS/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 unit for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure.

The City’s 2021 CAP was adopted on March 10, 2021 (City 2021). The 2021 CAP provides an update to the inventories, projections, and GHG reduction measures identified in the 2013 CAP (City 2013b). A lead agency may conclude that a project’s GHG impact is not cumulatively significant if the project demonstrates consistency with the CAP, which is a qualified GHG reduction plan under CEQA (CEQA Guidelines Section 15183.5[h][3]). The CAP sets GHG reduction targets and proposes achievable, locally based strategies to reduce GHG emissions from both municipal and community activities. The state’s GHG reduction targets established in Senate Bill (SB) 32 set a goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Utilizing the previous citywide GHG emissions inventory from 2012 and following the state’s GHG reduction targets, estimated equivalent reductions at the local level would need to reduce emissions to 42 percent below 2012 levels by 2030 and 52 percent below 2012 levels by 2035.

The City has established a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [MT CO₂e] per year) for new development projects to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Review Checklist (included as Appendix E to the CAP). New development projects that are consistent with the General Plan and are expected to generate fewer than 500 MTCO₂e annually would not have a cumulative impact and would not be required to provide additional analysis. The Project would be consistent with the citywide emissions projections because it would replace an existing structure and is consistent with the land use designation and existing uses.

Construction of the Project would result in GHG emissions generated by vehicle engine exhaust from heavy construction equipment and worker commuter trips, as well as water use. The Project’s construction GHG emissions were estimated using the same assumptions and methods as the air quality analysis (using CalEEMod Version 2020.4.0) and are shown in Table 3, *Estimated Project-related GHG Emissions*. Construction activities would include grading and construction, which are combined into one phase for modeling purposes. As shown in Table 3 GHG emissions estimated to occur during construction of the Project total approximately 187.61 MT CO₂e. Amortized over an estimated 30-year Project lifetime, construction emissions would be approximately 6.25 MT CO₂e per year.

Table 3
ESTIMATED PROJECT-RELATED GHG EMISSIONS

Emission Sources	Emissions (MT CO₂e)
Construction	
2023	123.25
2024	64.36
Total	187.61
<i>Construction (amortized over 30 years)</i>	6.25
Total Annual Project Emissions	6.25
City Screening Threshold	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 2022).

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

Once operational, the new culvert bridge would have the same usage and function as the existing culvert bridge and would not result in changes to emissions from traffic on public roadways or from bridge maintenance activities compared to existing conditions. As a culvert for water conveyance and stormwater runoff within Kit Carson Park, the completed Project would not create a unique use that would attract more visitors to the park, nor would it require increased maintenance over what is already performed within the Park. Emissions resulting from implementation of the Project would not exceed the screening threshold of 500 MT CO₂e. Therefore, the implementation of the Project would not generate GHG 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?

Less Than Significant Impact. The Project would replace an existing culvert bridge that is deteriorating. The Project would not generate growth in population or employment or require the alteration of an existing land use designation through amendment(s) to the City’s General Plan or changes to zoning. Long-term operation of the culvert bridge would not result in changes to GHG emissions from maintenance activities, compared to the existing condition. Furthermore, as shown in Table 3, Project construction would not result in a significant increase in GHG emissions. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the City’s 2021 CAP. The impact would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

- 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 Project proposes to replace an existing culvert bridge, 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. The Construction Contractor would be required to use standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment. 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. As discussed above, the Project would not result in the introduction of new hazardous materials within the Project Area. Construction would involve typical construction equipment and on-site use and storage of hazardous materials. Operation of the new culvert bridge would entail the same usage/maintenance as the existing conditions. The level of risk associated with the accidental release of other hazardous substances is not considered significant, due to the small volume and low concentration of these hazardous materials anticipated to be present on site. Applicable regulatory requirements associated with the possible release 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. Construction Contractor would be required to use standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment. Therefore, impacts would be less than significant.

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

No Impact. The Project Area is not located within one-quarter mile of an existing or proposed school. The nearest schools are San Pasqual High School, located approximately 0.3 mile east of the Project Area; and L.R. Green Elementary School and Bear Valley Middle School, located approximately 0.4 mile north of the Project Area. Nonetheless, the Project would adhere to necessary regulatory requirements regarding hazardous materials. Impacts related to the handling of acutely hazardous materials are not anticipated, and no impacts would occur.

- 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?

No Impact. Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the State Water Resource Control Board (SWRCB) GeoTracker database (SWRCB 2022) and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2022) were searched for hazardous materials sites within 0.25 mile of the Project Area. Based on a review of these databases, there are no hazardous materials sites located within the Project Area. However, there is a leaking underground storage tank (LUST) site located approximately 1,400 feet east of the Project Area. The LUST site is associated with San Pasqual High School, and the potential contaminant of concern was gasoline. The site was restored, and the case has been closed as of June of 2006. Therefore, the Project would not cause a significant hazard to the public or the environment related to a hazardous materials site, and no impact would occur.

- 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?

No Impact. The Project is not located within an airport influence area or within two miles of a public or public use airport and is not subject to the requirements of any airport land use compatibility plan. The two nearest public airports to the City are the McClellan-Palomar Airport and Ramona Airport, located approximately 12.7 miles and 8.5 miles from the Project Area, respectively. Although portions of the City are subject to periodic flyovers from Marine Corps Air Station (MCAS) Miramar, which is located approximately 14 miles southwest of the Project Area, the mapped noise and safety hazard locations associated with these three airports are not located within the City. Therefore, the Project would not result in a noise or safety hazard for people residing or working in the project area. 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 Area vicinity is provided in the County of San Diego General Plan and related documents, and in the General Plan Community Protection Element. 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 Area 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 Project and may be utilized by the minimal Project-related construction traffic, including I-15, Bear Valley Parkway, Via Rancho Parkway and San Pasqual Road.

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 negligible average daily trips (ADT) anticipated for this type of 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 operational activities. Therefore, impacts related to impairment of an emergency response or evacuation plan 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 is located in an urbanized area, surrounded by commercial and residential land uses. According to the General Plan Community Protection Element, the Project Area and vicinity is located in a high fire hazard zone. 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.

The proposed project would not involve the placement of new structures, nor would it be inconsistent with policies and regulations governing fire safety, including the Escondido Fire Code (found in the Escondido Municipal Code, Chapter 11, Article 2, Division 1), 2019 California Fire Code, and County of San Diego 2020 Consolidated Fire Code. Conformance with current fire codes would ensure that long-term operational fire hazards would be less than significant.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Escondido is within the jurisdiction of the SDRWQCB, which is tasked with protecting the region’s water quality objectives that meet the standards set forth in the Section 303 of the federal Clean Water Act as well as the state’s Porter-Cologne Water Quality Act. The SDRWQCB designates beneficial uses of surface water and groundwater, sets qualitative and quantitative water quality objectives that must be met to protect designated beneficial uses, and develops implementation programs to protect the regional water resources through its Water Quality Control Plan for the San Diego Basin (the Basin Plan).

As outlined in the following analysis, potential Project related water quality impacts are associated with short-term construction activities. Construction 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 Area. The short- and long-term discharge of pollutants from the Project Area could potentially result in significant water quality impacts to downstream receiving waters. In high water conditions, Eagle Scout Lake overflows to wetland areas in the southern portion of the Park. Flow eventually enters Lake Hodges and then the San Dieguito River.

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 stormwater 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.

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 Area is within the Del Dios sub area of the San Dieguito Hydrologic Unit. According to the California Department of Water Resources Basin Boundaries Data Viewer, the Project is not underlain by a groundwater basin, but it is within the vicinity of the San Pasqual Valley Groundwater basin (California Department of Water Resources 2022). The Project would not require the use of groundwater or deplete groundwater supplies from the area. The culvert bridge and relocated utilities would not require the use of water, nor would the Project interfere with sustainable groundwater recharge as it would replace the existing facilities in kind. If construction of the Project involves dewatering, a dewatering plan would be prepared per City and RWQCB requirements and submitted for review and approval by the City. 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 decrease groundwater supplies or inhibit recharge. Impacts would be less than significant.

- 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 Kit Carson Panhandle drainage is an open channel that conveys runoff from the north end of Kit Carson Park and flows south towards Eagle Scout Lake. Eagle Scout Lake was originally built to function as a sediment basin, indicating that there may have been high levels of sediment transported through the Park within the drainage. In high water conditions, Eagle Scout Lake overflows to wetland areas in south Kit Carson Park (Kleinfelder 2018).

Construction of the Project would require the temporary diversion of the active creek to install the concrete culvert bridge. Methods to divert the creek may include temporary gravel bag berms, portable pump equipment, temporary pipe siphons and earthen berms. Prior to construction, a creek diversion plan would be prepared in accordance with RWQCB requirements and submitted to the City for review and approval. If construction of the Project involves dewatering, a dewatering plan would also be prepared per City and RWQCB requirements and reviewed by the City.

As described above in Sections VII(b) and X(a), Project design would include structural BMPs to manage erosion. The Project would include storm drain inlet protection that would be installed at on-site storm drain inlets. This would prevent sediment from entering the storm drain system. Desiltation basins would also be included at drainage outlets from the graded site where feasible. Additionally, erosion control measures would be implemented on slopes and exposed soil utilizing BMPs described in the sections referenced above. To further address potential water quality impacts, the Project would comply with NPDES 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). 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. 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?

Less Than Significant Impact. Refer to Section X(c)i. The Project would temporarily alter the existing drainage of the site. The use of BMPs throughout the site would decrease surface runoff velocities, reducing the chances of flooding on or off site. Impacts would be less than significant.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

No Impact. Refer to Sections X(a) through X(c)i-ii. Runoff from the site would be channeled through the Project Area, similar to existing conditions. Runoff would not exceed the capacity of the proposed replacement stormwater drainage system or provide additional sources of polluted runoff with implementation of BMPs. Impacts would be less than significant.

- iv. Impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency (FEMA) flood map the Project Area is within the Regulatory Floodway in Zone AE (FEMA 2016). Zone AE is the flood insurance rate zone used for the one-percent-annual-chance floodplains subject to inundation by a 100-year flood. The Project proposes to replace the existing culvert bridge that is currently used to convey flows from Arroyo Del Oro Creek to Eagle Scout Lake. The replacement culvert bridge would continue to facilitate flood flows within the Project area. As discussed above, construction of the Project would require the temporary diversion of the active creek to install the concrete culvert bridge. Prior to construction, a creek diversion plan would be prepared and submitted to the City for review and approval. If construction of the Project involves dewatering, a dewatering plan would also be prepared per City and RWQCB requirements and reviewed by the City. The Project would temporarily redirect flood flows during construction, but would not impede flows once operational. With the incorporation of BMPs and implementation of the creek diversion plan, impacts would be less than significant.

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

No Impact. As described in Section X(c)iv, the Project Area is within a 100-year floodplain (FEMA 2016) and would implement BMPs and a creek diversion plan during construction to reduce potential effects related to release of pollutants during flooding. Tsunamis are usually caused by displacement of the

ocean flood causing large waves and are typically generated by seismic activity. Since the Project is located approximately 14 miles from the Pacific Ocean, a tsunami hazard is not present. A seiche is a standing wave in an enclosed or partly enclosed body of water and is normally caused by earthquake activity. The nearest body of water, Lake Hodges, is approximately 2.5 miles away, which is too far to present flood hazards by a seiche event. The Project would not be subject to flood hazards, tsunamis, or seiches and therefore would not release pollutants due to Project inundations. No impact 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 Sections X(a) through X(d). The Project would comply with all stormwater quality standards during construction and operation, and appropriate BMPs would be implemented to address potential water quality impacts. Impacts would be less than significant.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) Physically divide an established community?

No Impact. The Project would replace an existing culvert bridge utilized for water conveyance and stormwater runoff within Kit Carson Park. The Project would not prohibit access to, or otherwise physically divide, an established community. No impact would occur.

- b) Cause 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?

Less Than Significant Impact. The Project is located within Kit Carson Park, an approximately 285-acre City-managed park, with 100 acres developed for recreational use. The Project Area is zoned as Open Space/Parks (OS) and is also designated in the General Plan as OpenSpace/Parks. The Project is not located within one of the City’s Focused Planning Areas. The Project would be consistent with the underlying land use designations, as it would replace an existing culvert bridge and utility infrastructure in kind and would not introduce a more intensive use than existing conditions. As discussed throughout this Initial Study, the Project would mitigate potentially significant environmental effects to below a level of significance.

The Project Area is located within the boundaries of the Draft MHCP Subarea Plan; however, this plan has not yet been approved or adopted. The Project Area occurs entirely within a public park. Impacts to

sensitive biological resources would be avoided as part of the Project or mitigated if avoidance is not feasible as discussed in Sections IV(a) through IV(e). Kit Carson Park is located within the HFPAs according to the Draft MHCP. For Projects within the HFPAs, the area that has been developed or is approved for development is outside the preserve, while the open space area is in the preserve and conserved at 90 to 100 percent (depending on the types of approved activities). Although this Project would have minor impacts to biological resources, Project operations would be consistent with existing conditions, and the current zoning and usage of the Project Area. 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. Implementation of the Project would not cause significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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. The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZ), according to known or inferred mineral resource potential. The process was based solely on geology, without regard to existing land use or land ownership. The Project is located in an area designated as MRZ-1 and MRZ-3, which includes areas where there are no significant mineral deposits present or likely to be present, as well as areas where mineral resource significance is undetermined, respectively (DOC 2015). According to Figure 4.11-1 of the General Plan FEIR, no existing or past mineral extraction facilities are located within the Project Area (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 related 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. There are no known mineral resources as designated by a local general plan, specific plan, or other land use plan within the Project Area. As described in Section XII(a), no existing or planned mining operations occur within the Project Area or immediate vicinity. Therefore, implementation of the

Project would not result in the loss of availability of a locally important mineral resource recovery site.
 No impact would occur.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

Less Than Significant Impact. The Project is anticipated to generate construction noise in the short-term. No new operational noise sources or increases in ambient noise are anticipated as a result of the Project.

Construction Noise

Construction noise in the City is regulated by Escondido Municipal Code Section 17-234. For grading activities specifically, Escondido Municipal Code Section 17-238 applies. The code prohibits construction on Sundays and holidays and allows construction between 7:00 AM and 6:00 PM on weekdays and between 9:00 AM and 5:00 PM on Saturdays. Grading activities are specifically restricted to the listed weekday hours, unless otherwise allowed by the City Manager. Section 17-234 also prohibits operation of construction equipment or combinations of construction equipment that generate noise levels in excess of 75 decibels (dB) one-hour average sound level ($L_{EQ}[1 \text{ hour}]$). For grading activities, a sound level of 75 dB L_{EQ} is not to be exceeded at the property line of a residential property.

Construction activities would comply with the work hours permitted by Sections 17-234 and 17-238 of the Escondido Municipal Code. Construction noise related to the Project would be generated by equipment involved with demolition of the existing culvert bridge and installation of the new culvert bridge.

Project construction noise was analyzed using the Roadway Construction Noise Model (RCNM; USDOT 2008), which estimates sound levels from standard construction equipment. The full RCNM outputs are provided in Appendix D. During the typical 8-hour work day, not all construction equipment would be in constant use. The equipment analyzed for the Project included an excavator, loader, and dump truck. They were analyzed together for construction noise impacts due to their likelihood of being used in conjunction with one another. The nearest receptors during construction would be located at Kit Carson Park approximately 500 feet away and the nearest residential property line is located approximately 1,100 feet north of the Project Area. As a result, the noise level generated by the anticipated construction equipment was modeled at 50 feet, 500 feet, and 1,100 feet. Table 4, *Construction Equipment Noise Levels*, provides the noise levels for expected construction equipment at these distances.

**Table 4
 CONSTRUCTION EQUIPMENT NOISE LEVELS**

Equipment	Usage (percent)	Noise Level at 50 feet (dBA L _{EQ}) ¹	Noise Level at 500 feet (dBA L _{EQ})	Noise Level at 1,100 feet (dBA L _{EQ})
Air Compressor	40	73.7	53.7	46.8
Backhoe	40	73.6	53.6	46.7
Concrete Mixer Truck	40	74.8	54.8	48.0
Concrete Pump Truck	20	74.4	54.4	47.6
Dump Truck	40	72.5	52.5	45.6
Excavator	40	76.7	56.7	49.9
Front End Loader	40	75.1	55.1	48.3
Jackhammer	20	81.9	61.9	55.1
Pumps	50	77.9	57.9	51.1
Excavator/Loader/ Dump Truck	40	79.9	66.2	59.4

Source: RCNM; Appendix D

¹ Noise modeled at a distance of 50 feet is presented for informational purposes.

dBA = A-weighted decibel; L_{EQ} = one-hour average sound level

As shown in Table 4, the highest anticipated noise level at 500 feet (Kit Carson Park) resulting from the use of an excavator, loader, and dump truck would be 66.2 dBA L_{EQ}. At the nearest residential property located approximately 1,100 feet north of the Project Area, the maximum anticipated noise level would be 59.4 dBA L_{EQ}. Construction noise levels would not exceed the City's hourly noise limit of 75 dBA L_{EQ} at any human receptor and construction would occur during the permitted hours.

Additionally, debris is anticipated to be limited to two hauling trips (Appendix A), which would not result in a perceptible increase in traffic noise on nearby roadways. Given that construction activities would not exceed the City's hourly noise limit of 75 dBA L_{EQ} at any human receptor and Project construction would occur during the permitted hours, impacts related to construction noise would be less than significant.

Operational Noise

After construction of the Project is complete, operational activities that occurred under the pre-Project conditions would resume. These activities include occasional park maintenance and recreational use of the Project Area. Occasional vehicle trips associated with park maintenance would not result in

perceptible changes to traffic noise in the Project Area. No new operational noise sources would be introduced to the Project Area and no increase in operational noise at the Project Area is anticipated. As a result, operational noise would not conflict with local policies and impacts 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 criteria provided in the General Plan FEIR, an impact would occur if construction would generate vibration levels greater than 65 vibration decibels (VdB) at a vibration-sensitive land use, 80 VdB at the nearest residence or building where people sleep, or 83 VdB at the nearest institutional land use with primarily daytime uses (City 2012b). The thresholds further indicate structural damage to buildings could occur if peak particle velocity (PPV) between 0.2 and 0.5 inches per second (in/sec) would occur at a structure. No vibration-sensitive buildings, such as medical offices or research facilities, or known structurally sensitive buildings are located in close proximity to the Project Area. As stated above, the nearest residence to the Project Area is approximately 1,100 feet to the north. Fire Station 4, another building where people sleep, is located approximately 1,100 feet east of the Project Area and the nearest daytime institutional land use is San Pasqual High School, located approximately 1,400 feet east of the Project Area. Loaded dump trucks may pass residences at a distance of approximately 200 feet when hauling debris off-site via the contractor access paths (see Figure 3).

Of the anticipated construction equipment, loaded dump trucks are anticipated to generate the highest vibration levels. According to Table 4.12-9 of the General Plan FEIR, a loaded dump truck could generate 68 VdB and 0.01 in/sec PPV at a distance of 100 feet. At a distance of 200 feet, (the nearest anticipated distance to residences during hauling trips), the loaded dump truck could generate 59 VdB and 0.003 in/sec PPV. However, these levels of vibration would not exceed the threshold of 80 VdB for residential uses or 0.2 in/sec PPV for structural damage. The levels of vibration at the school located 1,100 feet to the east would therefore also be below the daytime threshold of 83 VdB. Therefore, vibration as a result of construction of the proposed Project would be below the City's thresholds. No operational sources of vibration would result from the Project. Impacts would be less than significant.

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?

No Impact. The two nearest public airports to the City are McClellan-Palomar Airport and Ramona Airport, which are located approximately 12.7 miles and 8.5 miles from the Project Area, respectively. Additionally, portions of the City are subject to periodic flyovers from MCAS Miramar. However, the entire City is outside of the 60 community noise equivalent level (CNEL) noise contours for these airports and no significant airport noise would affect the Project Area. As the Project Area is not within 2 miles of a public airport, two miles of a private airstrip, or the noise contours of an airport land use plan, the Project would not expose people residing or working in the Project area to excessive noise levels, and no impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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)?

No Impact. The Project does not include the development of housing or businesses. Construction activities would be generally minor occurring over a nine-month period, and workers would be assumed to be supplied from the surrounding region. Operation of the Project would be consistent with existing conditions and would not introduce a new or expanded use or create an attraction that would bring people to the area. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. No impact would occur.

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

No Impact. The Project does not include housing, nor does the Project Area currently support housing as a public park. Operation of the Project would be consistent with existing conditions and would not introduce a new or expanded use from the existing culvert bridge. Therefore, the Project would not displace substantial numbers of existing people or housing. No Impact would occur.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Fire protection?

No Impact. The 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 (City 2012a). The closest fire station to the Project Area is Station 4, located approximately 1,100 feet (0.25 mile) east of the Project Area on Bear Valley Parkway. Operation of the Project would be consistent with existing conditions and would not introduce a new or expanded use from the existing culvert bridge. Therefore, there would be no need for new or altered fire protection facilities or related infrastructure that could result in significant adverse physical impacts. No impact would occur.

b) Police protection?

No Impact. The 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 (City 2012a). The closest police station to the Project Area is approximately 4.26 miles north of the Project Area on Centre City Parkway. Operation of the Project would be consistent with existing conditions and would not introduce a new or expanded use from the existing culvert bridge. Therefore, there would be no need for new or altered police protection facilities or related infrastructure that could result in significant adverse physical impacts. No impact would occur.

c) Schools?

No Impact. The nearest schools to the Project Area are San Pasqual High School, located approximately 0.3 mile east of the Project Area; and L.R. Green Elementary School and Bear Valley Middle School, located approximately 0.4 mile north of the Project Area. Operation of the Project would be consistent with existing conditions and would not introduce a new or expanded use from the existing culvert

bridge. Additionally, the Project would not introduce a new population to the area or include any residential. Therefore, there would not be a need for new school facilities, nor would there be an increase in demand on the existing facilities. No impact would occur.

d) Parks?

Less Than Significant Impact. The Project would not increase the demand for park space and nor would it increase usage at existing City parks. According to the Community Health and Services Element of the City’s General Plan, Escondido has 32 parks comprising 6,556.3 acres in the City, including the 285-acre Kit Carson Park within which the Project is located (City 2012a). The Project involves the removal of an existing damaged corrugated steel oval “squash” pipe and construction of a new cast-in-place double cell concrete culvert bridge at the inlet of Eagle Scout Lake within Kit Carson Park. Temporary use of the Project Area would be restricted during construction; however, the area is not currently accessible to the public due to safety concerns. Once construction has been completed, the area would be accessible to the public, improving upon the existing condition. The Project would not create an increased demand on the park itself, as the replacement of the culvert bridge would not be an attraction that would cause additional visitation of the park. Impacts related to parks would be less than significant.

e) Other public facilities?

No Impact. The Project would not increase the population of the area, nor would it cause increased demand on Kit Carson Park or other public facilities. The Project would not require the construction of new or expanded public facilities and no impact would occur.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The Project would replace a damaged culvert bridge at the inlet of Eagle Scout Lake within Kit Carson Park. The Project also includes the relocation of a portion of existing reclaimed water line and a fiber optic conduit located in the vicinity of the existing culvert bridge. As noted in Section XV(iv), temporary use of the Project Area would be restricted during construction;

however, the area is not currently accessible to the public due to safety concerns. Once construction has been completed, the area would be accessible to the public, improving upon the existing condition. The Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project would improve a public facility, and therefore 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?

Less Than Significant Impact. The Project does not propose the development of recreational facilities or the expansion of existing recreational facilities. The Project would replace a damaged culvert bridge within Kit Carson Park. As described throughout this document, the Project would not have a substantial adverse physical effect on the environment. Impacts would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. According to Escondido Zoning Code Article 47, while changes in level of service (LOS) at street intersections or segments may not be used to determine whether a Project would cause traffic impacts for purposes of CEQA analysis, they may be used to determine if the Project is consistent with the General Plan's Street Network Policy 7.3. The operations of the Project would not increase the amount of travel to and from the Project Area. The replacement of the culvert bridge would not act as an attraction for additional park visitors, and maintenance of the Project Area would be performed by existing park maintenance staff. As such, once operational, the Project would be consistent with existing conditions, would not result in changes in LOS at street intersections and segments, and would not conflict with the General Plan's Street Network Policy 7.3.

Project construction activities would generate a short-term, temporary increase in construction-related traffic. The main access point for Project construction would be off Casteneda Drive, with additional site

access available off Entrance Drive. The construction staging area would be located at an internal parking lot north of the Project Area (see Figure 3). Temporary Project-generated traffic would primarily include construction workers commuting to and from the site. Based on the relatively small size of the Project work area (0.09 acre) and associated limited intensity of construction activities, the Project is not expected to generate worker commute trips that would change the LOS of nearby street intersections and segments. Similarly, the Project would not require high levels of import or export of materials and would not generate truck traffic that would change the LOS of nearby street intersections and segments. Project construction would therefore not conflict with the General Plan's Street Network Policy 7.3.

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. Transit service in the Project Area is provided by North County Transit District (NCTD) and is serviced by bus route 350. The closest 350 route stop to the Project Area is the Bear Valley Parkway and Kit Carson Park stop, located 0.25 mile east of the Project Area. The 350 route connects the Project Area to the Escondido Transit Center, located approximately 3 miles north of the Project Area. The Escondido transit center connects most Escondido bus routes, along with connections to the SPRINTER line and the Greyhound Bus Routes. The Project Area is also accessible by several public trails, including the Kit Carson Loop trail. Class 2 bicycle lanes are provided on both sides of Bear Valley parkway. The Project would not conflict with bicycle access to the Project Area as it would be constructed internally within the Park. Alternative transportation modes would not be impacted by the Project and would be available for use during construction and operation of the Project, consistent with the General Plan Mobility and Infrastructure Element.

The Project would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b) provides criteria to evaluate a project's potential impact on transportation and traffic depending on the type of project. Section 15064.3(b) establishes vehicle miles traveled (VMT) as the appropriate measure for transportation impacts and eliminates automobile delay as appropriate for the determination of potentially significant transportation and traffic impacts. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. For projects that reduce or have no impact on VMT (meaning there is no increase in demand for additional trips to be generated), CEQA Guidelines Section 15064.3 suggests that these projects be concluded to cause a less than significant impact. Additionally, the Office of Planning and Research (OPR) technical advisory regarding transportation impacts indicates that small projects generating fewer than 110 trips per day can be assumed to cause a less than significant transportation impact (OPR 2018). Traffic impacts associated with the Project would be mainly limited to the construction period of the Project. As stated above, the Project would not contribute to an increase in operational ADT compared to existing conditions, since operation of the Project would be consistent with existing conditions. Therefore, the Project would not exceed the 110-trip threshold and no conflicts with CEQA Guidelines Section 15064.3 subdivision (b) would occur. 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 Project would not increase hazards due to a geometric design feature. The purpose of the Project is to improve safety for the public and facilitate regular maintenance of the drainage structure by replacing the existing deteriorating culvert bridge. The new structure would improve safety for Park patrons by repairing the crossing and associated path for pedestrian use and incorporating handrails that complement existing handrails on nearby crossings. The crossing's integrated maintenance features would improve safety for City operations personnel responsible for regular facility maintenance. The Project would not include incompatible uses of the Project Area or surrounding areas. 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. Please see Section IX(f). 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 above, 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 negligible 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. Accordingly, impacts associated with emergency access would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact with Mitigation Incorporated. As detailed in Section V(b), the general vicinity of the Project Area is known to have been occupied/used by the Luiseño and Kumeyaay people for thousands of years. No cultural resource sites were identified within the Project Area during the archaeological survey. record search of the NAHC Sacred Lands File (SLF) was completed for the Project by Kleinfelder (2021c). The results were positive and indicated that the Project Area is within the ancestral territory of the Kwaaymii Laguna Band of Mission Indians and the San Luis Rey Band of Mission Indians. Although no tribal cultural resources have been identified within the Project Area, there is potential for unrecognized resources to be discovered upon removal of the existing culvert bridge structure and/or utilities, 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 Arroyo Del Oro 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.

Native American/Tribal Consultation - In accordance with the requirements of AB 52, the City sent notification to five Native American Tribes traditionally and culturally affiliated with the Project Area on February 8, 2023. The City received requests for formal consultation from three Tribes: San Pasqual Band of Mission Indians, San Luis Rey Band of Mission Indians, and Rincon Band of Luiseño Indians. The City conducted formal consultation with the San Luis Rey (Carmen Mojado and Banning Taylor) on May 4, 2023; San Pasqual (Angelina Guterrez and Desiree Morales Whitman) on April 20, 2023; and Rincon (Cheryl Madrigal) on April 6, 2023. The Tribes recommended that Native American monitors be

present during ground disturbing activities and appropriate mitigation measures be incorporated into the project conditions to address potential discovery of cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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. In addition to replacement of the existing culvert bridge, the Project includes the relocation of a portion of reclaimed water line and a fiber optic conduit located in the vicinity of the existing facility.

Additionally, the proposed Project is part of a storm water drainage. In high water conditions, Eagle Scout Lake overflows to wetland areas in the southern portion of the Park. Flow eventually enters Lake Hodges and then the San Dieguito River. Over time the existing culvert bridge transporting water to Eagle Scout Lake has been damaged by large flow events. The replacement of the culvert bridge would restore this water transport and ensure appropriate capacity to convey stormwater to Eagle Scout Lake. As stated throughout this document, the proposed Project would not cause significant environmental effects. 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. The Urban Water Management Planning Act, adopted in 1983, requires water suppliers in California to conduct long-term water resources planning and specifically, Section 10620(a) of this Act, identifies that urban water suppliers shall prepare and adopt an urban water management plan (UWMP) and that these plans are to be updated every five years. The project site is within the service area of the City of Escondido Water District. The water service reliability assessment results in the 2020 UWMP indicate that no water shortages are anticipated within the next 25 years under normal, single-dry, and multiple dry years conditions, including a five-year drought extending through 2025 (City 2021d). The City of Escondido Water District imports water from the San Diego County Water Authority and Metropolitan Water District, both of which have sufficient portfolios to accommodate changes to the City's water needs and anticipate the ability to meet projected imported water demands under normal, single-dry year, and multiple dry year conditions. Operation of the Project would not require water supply. A negligible, short-term increase in demand for water during construction, including implementation of construction BMPs, would occur. The temporary nature of the required water and the relatively minor amount required during construction would not create a considerable demand for water or new water services. Therefore, sufficient water supply would be available for construction of the Project, and 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. Construction and operation of the Project would not require wastewater treatment. The Project proposes the replacement of a culvert bridge and relocation of existing utilities; the ultimate condition would be similar to existing conditions and would not affect the capacity of the City's wastewater treatment system. 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. During construction, the Project would create solid waste that would be collected by Escondido Disposal, Inc. and disposed of at a regional landfill. Construction debris is anticipated to be limited to two hauling trips, which would not contribute to a substantial increase in waste disposal beyond the existing regional landfill capacity. The estimated 10 cubic yards of excess graded material is anticipated to be distributed within the Project Area instead of hauled off site. As discussed below in item XIX(d), construction activities associated with the Project would be required to comply with state and local standards related to solid waste, including applicable requirements for diversion of construction and demolition debris to reduce waste deposited at the landfill, the California Integrated Waste Management Act, and the City's solid waste reduction 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. The Project would comply with the City's solid waste reduction programs, which are designed to comply with federal, state, and local statutes and regulations related to solid

waste. These statues and regulations include the California Integrated Waste Management Act and the City’s solid waste disposal policies and practices. Associated impacts would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Refer to Section 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?

Less Than Significant Impact. According to the General Plan Community Protection Element, the Project Area and vicinity is located in a high fire hazard zone. However, the Project would not introduce new occupied structures, and would adhere to the Escondido Fire Code (found in the Escondido Municipal Code, Chapter 11, Article 2, Division 1), 2019 California Fire Code, and County of San Diego 2020 Consolidated Fire Code. Conformance with current fire codes would ensure that wildfire risks within the Project Area would not be exacerbated as a result of Project implementation. Accordingly, there are no factors that would expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

- 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 Project involves the removal of an existing damaged corrugated steel oval “squash” pipe and construction of a new cast-in-place double cell concrete culvert bridge at the inlet of Eagle Scout Lake situated within Kit Carson Park. The Project also includes the relocation of a portion of reclaimed water line and a fiber optic conduit located in the vicinity of the existing culvert bridge. The proposed Project 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?

Less Than Significant Impact. Refer to Section XX(b). The risk to people and structures from downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes is negligible. Impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Where deficiencies exist relative to the City’s General Plan Quality of Life Standards, does the Project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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?

Less Than Significant with Mitigation Incorporated. Potentially significant impacts to the environment resulting from the Project have been identified for the areas of biological resources and cultural resources (including tribal cultural resources). With the incorporation of mitigation measures **BIO-1** through **BIO-4**, the Project would reduce potential impacts to biological resources to below a level of significance.

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 Area, however, the Project would have the potential to impact unknown subsurface cultural resources during ground-disturbing construction activities. 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.

Therefore, the Project would not have the potential to degrade the quality of the environment for sensitive or special-status plant or animal communities, 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. Impacts would be less than significant through implementation of mitigation measures.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and 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, biological impacts would be reduced through monitoring and avoidance mitigation measures, and impacts to unknown buried cultural resources would be avoided through construction monitoring and associated mitigation 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 Project would not have a significant individual or cumulatively considerable impact on the environment.

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

Less than Significant With Mitigation Incorporated. The Project would adhere to regulatory codes, ordinances, regulations, standards, and guidelines applicable to each of the environmental issue areas analyzed herein. As described above, adverse impacts on human beings resulting from implementation

of the Project would be less than significant. With the adherence to applicable regulations and the implementation of BMPs and applicable Project design features, the Project would not result in significant long- 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 (City 2009). As described throughout this IS/MND, the Project would result in less than significant impacts related to air quality and would not adversely impact the services identified above. Moreover, the Project is consistent with designated land use and does not propose development of a new or expanded use compared to existing conditions. As such, no deficiencies relative to the City's General Plan Quality of Life Standards or related conflicts with the City EQR would occur.

3.0 References

Project-specific Technical Reports

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Escondido Municipal Code, as amended June 2022
California Department of Conservation San Diego County Important Farmland Map
SANDAG Demographic and Socioeconomic Estimates for Escondido
San Diego County General Plan
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

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