California Environmental Quality Act

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

East Valley Parkway and Midway Drive Drainage Improvement Project

Escondido, CA

October 2025

Lead Agency:

City of Escondido
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Engineering Division
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List of Acronyms and Abbreviations

AB	Assembly Bill
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CAP Consistency Checklist	Climate Action Plan Consistency Review Checklist
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH4	Methane
CHRIS	California Historical Resources Inventory System
City	City of Escondido
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
Construction General Permit	National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order WQ 2022-0057-DWQ
DDT	Dichlorodiphenyltrichloroethane
DPM	Diesel particulate matter
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FCC	Flood Control Channel
FEMA	Federal Emergency Management Agency
GHG	Greenhouse gas

in/sec	Inches per second
IS	Initial Study
L_{dn}	Day-Night Sound Level
L_{eq}	Equivalent sound level
L_{max}	Maximum sound level
Michael Baker	Michael Baker International
$MMTCO_2e$	Million metric tons of carbon dioxide equivalents
MND	Mitigated Negative Declaration
$MTCO_2e$	Metric tons of carbon dioxide equivalents
N_2O	Nitrous oxide
NAHC	Native American Heritage Commission
NCTD	North County Transit District
ND	Negative Declaration
NEPA	National Environmental Policy Act
NO_X	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	Ozone
PCE	Perchloroethylene
PM_{10}	Particulate matter up to 10 microns
$PM_{2.5}$	Particulate matter up to 2.5 microns
ppm	parts per million
PPV	Peak particle velocity
PRMP	Paleontological Resources Mitigation Program
project	East Valley Parkway and Midway Drive Drainage Improvement Project
proposed project	East Valley Parkway and Midway Drive Drainage Improvement Project
RAQS	San Diego County Regional Air Quality Strategy
RMS	Root mean square

ROG .....Reactive Organic Gases

RWQCB .....San Diego Regional Water Quality Control Board

SANDAG.....San Diego Association of Governments

SCAQMD .....South Coast Air Quality Management District

SCIC .....South Coastal Information Center

SCS .....Sustainable communities strategy

SDAB .....San Diego Air Basin

SIP.....State Implementation Plan

SO_2 .....Sulfur dioxide

SO_X.....Sulfur oxides

SVP .....Society of Vertebrate Paleontology

SWPPP.....Storm Water Pollution Prevention Plan

SWRCB .....State Water Resources Control Board

TAC.....Toxic air contaminants

TCE .....Trichloroethylene

U.S.....United States

USACE .....U.S. Army Corps of Engineers

VMT .....Vehicle miles traveled

VMT Guidelines .....City of Escondido Transportation Impact Analysis Guidelines

PROJECT INFORMATION SHEET

1.	Project Title:	East Valley Parkway and Midway Drive Drainage Improvement Project
2.	Lead Agency Name and Address:	City of Escondido Development Services Department, Engineering Division 201 North Broadway City Hall, First Floor Escondido, CA 92025
3.	Contact Person and Phone Number:	Matt Souttere Project Manager 760-214-4718 matt.souttere@escondido.gov
4.	Project Location:	The project site is in the central portion of the City of Escondido (City) in northern San Diego County. The linear project site is generally bounded by East El Norte Parkway to the north, Bear Valley Parkway to the east, South Rose Street and Glenridge Road to the south, and North Rose Street to the west.
5.	Project Sponsor's Name and Address:	City of Escondido Development Services Department, Engineering Division 201 North Broadway City Hall, First Floor Escondido, CA 92025
6.	General Plan Designation:	The project site is located within public rights-of-way associated with existing roadway corridors and the concrete-lined Escondido Creek. Roadway corridors in the city do not have a General Plan designation. Escondido Creek has a General Plan designation of "Flood."
7.	Zoning:	The project site is located within public rights-of-way associated with existing roadway corridors and the concrete-lined Escondido Creek. Roadway corridors in the city do not have a

zoning designation. Escondido Creek is zoned as “Flood Control Channel” (FCC).

8. Description of Project:

The proposed East Valley Parkway and Midway Drive Drainage Improvement Project (hereafter referred to as “proposed project” or “project”) would involve increasing the capacity of the storm water drainage systems in the central portion of the city. The existing storm water drainage systems in the project area are undersized and unable to collect and convey anticipated flow rates, resulting in more than 1,600 properties being completely or partially within a Federal Emergency Management Agency (FEMA) 100-year floodplain. Localized flooding occurs within the project area and has triggered deployment of sandbags and road closures an average of five times per year since 2019.

The proposed project would involve the construction of:

- Approximately 16,700 linear feet of reinforced concrete box culverts beneath existing roadways and adjacent public rights-of-way (e.g., sidewalks),
- Approximately 4,400 linear feet of reinforced concrete pipelines beneath existing roadways and adjacent public rights-of-way (e.g., sidewalks), and
- Four new points of connection for storm water to enter Escondido Creek within the project site.

The culverts would range in size from a single 6-foot by 4-foot culvert (24 square feet in area) to a dual 12-foot by 10-foot culvert (240 square feet in area). The pipelines would be 36 inches in diameter (approximately 7 square feet in area) and 54 inches in diameter (about 16 square feet in area). The project would require relocation of some existing underground utility lines to accommodate the proposed storm water drainage culverts. After relocation of existing utilities and installation of the proposed storm water drainage culverts and pipes, the affected roadways/sidewalks would be resurfaced. Road resurfacing would include the provision of storm water drainage inlets along both sides of the roads to collect runoff. The proposed storm water drainage improvements would provide filtration and treatment of runoff before discharging into Escondido Creek pursuant to state and regional water quality requirements. The proposed culverts/pipes would be installed beneath existing public rights-of-way primarily associated with roadways and sidewalks, including segments of North Midway Drive, South Midway Drive, East Lincoln Avenue, East Mission Avenue, North Citrus Avenue, North Rose Street, East Grand Avenue, East Washington Avenue, Daisy Street, and an unnamed alley immediately south of East Washington Avenue and north of Escondido Creek, between North Rose Street and Begonia Street.

Construction of the proposed project is anticipated to commence in the first quarter of 2026 and be completed in approximately 24 months.

9. Surrounding Land Uses and Setting:

   The project site is in an urbanized area, and surrounding land uses include single- and multi-family residences, commercial uses, schools, religious institutions, a self-storage center, a fire station, and a public park. Sidewalks, bike lanes, and bus stops are located along some of the roadway segments within the project site.

10. Other Public Agencies Whose Approval is Required:

    - FEMA
    - United States Army Corps of Engineers
    - San Diego Regional Water Quality Control Board
    - California Department of Fish and Wildlife

11. Have California Native American tribes traditionally and culturally affiliated with the project 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.?[1]

    On October 28, 2024, the City initiated the tribal consultation process in accordance with Assembly Bill (AB) 52. Tribes that have requested to receive notification from the City pursuant to AB 52 or were included on a list provided by the Native American Heritage Commission (NAHC) were notified in writing on October 28, 2024 via U.S. Certified Mail. As part of this process, the City provided each of the tribes the opportunity to consult with the City regarding the proposed project. Consultation request letters were received from the San Luis Rey Band of Mission Indians, dated November 8, 2024, and the Rincon Band of Luiseño Indians, dated November 26, 2024. The City initiated consultation with the San Luis Rey Band of Mission Indians on February 6, 2025 and the Rincon Band of Luiseño Indians on March 5, 2025. As detailed in Section 3.18, Tribal Cultural Resources, tribal consultation has been concluded with Rincon Band of Luiseño Indians but is ongoing with San Luis Rey Band of Mission Indians as of the date of publication of this IS/MND.

[1] NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

1.0 INTRODUCTION

1.1 Document Overview

Michael Baker International prepared this Initial Study (IS) for the City of Escondido (City) pursuant to the California Environmental Quality Act (CEQA) to assess whether there may be significant environmental impacts from implementation of the proposed East Valley Parkway and Midway Drive Drainage Improvement Project (hereafter referred to as "proposed project" or "project"). Based on the responses to the IS checklist questions, the Lead Agency finds a Mitigated Negative Declaration (MND) is the appropriate level of CEQA environmental documentation. This MND concludes that there is no substantial evidence that there may be significant environmental impacts, or, if there is a potentially significant impact, feasible mitigation measures have been identified that would avoid or mitigate the potential impact(s) to a less than significant level.

1.2 Lead Agency

The City of Escondido is the Lead Agency for the proposed project pursuant to CEQA and implementing regulations.[2] The Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment. The Lead Agency is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the project and subsequent construction and operation would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an IS is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration (ND), or MND would be appropriate as the necessary environmental documentation and clearance for the proposed project.

The purpose of an IS under Section 15063(c) of the CEQA Guidelines is to:

- Provide the Lead Agency with information necessary to decide if an EIR, ND, or MND should be prepared.
- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND or MND.
- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects determined to be significant, identifying the adverse effects determined not to be significant, explaining the reasons for determining that potentially significant adverse effects would not be significant, and identifying whether a program EIR, or other process, can be used to analyze adverse environmental effects of the project.
- Facilitate an environmental assessment early during project design.
- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.

[2] Public Resources Code Sections 21000–21177 and California Code of Regulations Title 14, Division 6, Chapter 3.

- Eliminate unnecessary EIRs.
- Determine if a previously prepared EIR could be used for the project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue an ND, and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare an MND for the proposed project. If the Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, the Lead Agency would require an EIR to further analyze these impacts.

1.3 Other Agencies

Other public agencies are provided the opportunity to review and comment on the IS/MND. Other public agencies could include:

- A Responsible Agency (CEQA Guidelines Section 15381) is a public agency, other than the Lead Agency, that has discretionary approval power over the project, such as permit issuance or plan approval authority.
- A Trustee Agency (CEQA Guidelines Section 15386) is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California.[3]
- Agencies with Jurisdiction by Law (CEQA Guidelines Section 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the project. Furthermore, a city or county will have jurisdiction by law with respect to a project when the city or county having primary jurisdiction over the area involved is: (1) the site of the project; (2) the area in which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

Responsible Agencies for the proposed project include FEMA, U.S. Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (RWQCB), and San Diego County Air Quality Management District. California Department of Fish and Wildlife (CDFW) is a Trustee Agency for the project.

1.4 Contents

CEQA Guidelines Section 15063(d) identifies the following specific contents of an IS:

- A description and the location of the project.
- An identification of the environmental setting.

[3] The four Trustee Agencies in California listed in CEQA Guidelines Section 15386 are the California Department of Fish and Wildlife, State Lands Commission, State Department of Parks and Recreation, and University of California.

- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR, ND, or MND. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.
- A discussion of measures to mitigate significant adverse environmental effects, if any.
- An examination of existing zoning, plans, and other land use controls that apply to the project.
- The names of persons that participated in the document preparation.

1.5 Organization of Initial Study/Mitigated Negative Declaration

This IS/MND is organized to satisfy CEQA requirements and includes the following sections:

- Section 1, Introduction, identifies the purpose and scope of the IS/MND.
- Section 2, Project Setting and Project Description, describes the existing environmental conditions of the project area and surroundings, and the proposed project activities.
- Section 3, Environmental Checklist, presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes mitigation measures, where needed, to render potential environmental impacts less than significant, where feasible.
- Section 4, References, includes a list of documents cited in the IS/MND.
- Section 5, List of Preparers, identifies the persons who contributed to preparation of the IS/MND.

1.6 Findings from the Initial Study

No Impact or Impacts Considered Less than Significant

The project would have no impact or a less than significant impact on the following environmental categories listed from Appendix G of the CEQA Guidelines:

- Aesthetics
- Agriculture/Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hydrology/Water Quality
- Hazards & Hazardous Materials
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Recreation
- Utilities/Service Systems
- Wildfire

Impacts Considered Less than Significant with Mitigation Measures

Based on the IS findings, the project would have a less than significant impact on the following environmental categories listed in Appendix G of the CEQA Guidelines when proposed mitigation measures are implemented:

- Biological Resources
- Cultural Resources
- Geology/Soils
- Public Services
- Transportation/Traffic
- Tribal Cultural Resources

Supporting Documents

Documents with supporting information or analyses used to prepare the IS/MND are included in the following appendices:

- Appendix A Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum
- Appendix B Biological Technical Report, Aquatic Resources Delineation Report, and Supplemental Memo
- Appendix C Cultural Resources Assessment
- Appendix D Preliminary Geotechnical Evaluation
- Appendix E Noise and Vibration Assessment

2.0 PROJECT SETTING AND PROJECT DESCRIPTION

2.1 Project Location

The approximately 57.5-acre project site is located in the City of Escondido in northern San Diego County, approximately 29 miles north of the downtown area of the City of San Diego and 15 miles east of the Pacific Ocean (see Figure 1, ***Regional Location***). The project site is an approximately five-mile-long corridor within public rights-of-way along existing roadways and Escondido Creek in the central portion of the city. The roadways within the project site include segments of North Midway Drive, South Midway Drive, Bear Valley Parkway, East Lincoln Avenue, East Mission Avenue, North Citrus Avenue, North Rose Street, East Grand Avenue, East Washington Avenue, Daisy Street, and an unnamed alley immediately south of East Washington Avenue and north of Escondido Creek, between North Rose Street and Begonia Street. Figure 2, ***Project Site and Vicinity***, shows the project site and general project area.

2.2 Project Setting

The City of Escondido consists of approximately 37.5 square miles. Surrounding jurisdictions include unincorporated San Diego County to the north and east, the City of San Diego to the south, and the City of San Marcos to the west.

The project site is in an urbanized area and surrounding land uses include single- and multi-family residences, commercial uses, schools, religious institutions, a self-storage center, a fire station, and a public park. Sidewalks, bike lanes, and bus stops are located along some of the roadway segments within the project site.

Escondido Creek is a concrete-lined channel in the project area that has been improved to convey runoff from a 100-year storm event.

2.3 Project Characteristics

The proposed project would involve increasing the capacity of the storm water drainage systems in three separate drainage basins (Maywood, Midway, and Citrus Washes) to collect and convey flows up to a 100-year storm event downstream to Escondido Creek. The existing storm water drainage systems in the Maywood, Midway, and Citrus Washes are undersized and unable to collect and convey anticipated flow rates, resulting in more than 1,600 properties being completely or partially within a FEMA 100-year floodplain. Localized flooding occurs within the project area and has triggered deployment of sandbags and road closures an average of five times per year since 2019.

The proposed project would involve the construction of:

- Approximately 16,700 linear feet of reinforced concrete box culverts beneath existing roadways and adjacent public rights-of-way (e.g., sidewalks),
- Approximately 4,400 linear feet of reinforced concrete pipelines beneath existing roadways and adjacent public rights-of-way (e.g., sidewalks), and
- Four new points of connection for stormwater to enter Escondido Creek within the project site.

The culverts would range in size from a single 6-foot by 4-foot culvert (24 square feet in area) to a dual 12-foot by 10-foot culvert (240 square feet in area). The pipelines would be 36 inches in diameter (approximately 7 square feet in area) and 54 inches in diameter (about 16 square feet in area). The project would require relocation of some of the existing underground utility lines to accommodate the proposed storm water drainage culverts. After relocation of existing utilities and installation of the proposed storm water drainage culverts and pipes, the affected roadways/sidewalks would be resurfaced. Road resurfacing would include the provision of storm water drainage inlets along both sides of the roads to collect runoff. The proposed culverts/pipes would be installed beneath existing public rights-of-way primarily associated with roadways and sidewalks. Table 1, *Proposed Culvert/Pipeline Characteristics*, details the roadway segments in which the proposed culverts/pipes would be installed, as well as culvert/pipeline dimensions and any existing utility lines that would require relocation or removal to install the proposed culverts/pipes.

After relocation of existing utility lines and installation of the proposed culverts and pipes, the affected roadways/sidewalks would be resurfaced. Road resurfacing would include the provision of storm water drainage inlets along both sides of the roads to collect runoff. The proposed storm water drainage improvements would provide filtration and treatment of runoff before discharging into Escondido Creek pursuant to state and regional water quality requirements.

Table 1. Proposed Culvert/Pipeline Characteristics

Roadway	Segment	Approximate Culvert/ Pipeline Length (linear feet)[1]	Culvert Dimensions/ Pipeline Diameter	Existing Utility Lines Requiring Relocation, Adjustment, or Removal
North Midway Drive/South Midway Drive	Approx. 150 feet north of Washington Avenue to approx. 250 feet north of Via Veneto	950	Dual 8-foot by 5-foot culvert	Removal of 72-inch-diameter storm water drainage pipeline
	Approx. 250 feet north of Via Veneto to East Lincoln Avenue	1,550	7-foot by 9-foot culvert	Removal of 72-inch-diameter storm water drainage pipeline
	East Lincoln Avenue to approx. 50 feet north of East Lincoln Avenue	100	7-foot by 4-foot culvert	Removal of 60-inch-diameter storm water drainage pipeline Adjustment of 24-inch-diameter storm water drainage pipeline
	Southern connection point into Escondido Creek channel to approx. 50 feet north of East Valley Parkway	1,150	Two 12-foot by 7-foot culverts	Relocation of communications line Removal of 78-inch corrugated metal pipe arch
	Approx. 50 feet north of East Valley Parkway to approx. 550 feet north of Grand Avenue	900	Dual 7-foot by 4-foot culvert and a 8-foot by 4-foot culvert	Adjustment of 6-inch-diameter gas pipeline Adjustment of 10-inch-diameter water pipeline Adjustment of 2-inch-diameter gas pipeline
	Approx. 550 feet north of Grand Avenue to approx. 50 feet south of Oak Hill Drive	1,900	Dual 10-foot by 4-foot culvert	Removal of 48-inch-diameter storm water drainage pipeline Relocation of 2-inch-diameter gas line Removal of two 65-inch by 40-inch corrugated metal pipe arch Relocation of 10-inch-diameter water pipeline
East Lincoln Avenue	North Midway Drive to approx. 50 feet north of Paula Street	1,150	12-foot by 5-foot culvert	Removal of 72-inch-diameter storm water drainage pipeline Relocation of 8-inch-diameter water pipeline Adjustment of 8-inch-diameter water pipeline
	Approx. 50 feet north of Paula Street to approx. 100 feet south of Nightingale Place	300	10-foot by 5-foot culvert	Removal of 72-inch-diameter storm water drainage pipeline

Table 1, continued

Roadway	Segment	Approximate Culvert/ Pipeline Length (linear feet)[1]	Culvert Dimensions/ Pipeline Diameter	Existing Utility Lines Requiring Relocation, Adjustment, or Removal
East Mission Avenue	North Midway Drive to Daisy Street	1,000	36-inch diameter pipe	None
North Citrus Avenue	Escondido Creek to approx. 50 feet south of Escondido Creek bridge crossing	100	Dual 8-foot by 9-foot culvert	Removal of 7.5-foot by 5-foot culvert
	Approx. 50 feet south of Escondido Creek bridge crossing to approx. 100 feet north of Prescott Glen	900	7-foot by 7-foot culvert	Removal of 66-inch-diameter sewer pipeline
	Approx. 50 feet south of bridge crossing Escondido Creek to approx. 100 feet north of East Valley Parkway centerline	1,600	10-foot by 7-foot culvert	Adjustment of 24-inch-diameter ductile iron blended water pipeline
	Approx. 100 feet north of East Valley Parkway centerline to approx. 100 feet south of East Valley Parkway centerline	200	8-foot by 6-foot culvert	Relocation of 8-inch-diameter sewer pipeline Adjustment of 4-inch-diameter natural gas line Relocation of 24-inch-diameter ductile iron blended water pipeline Adjustment of 10-inch-diameter water pipeline
	Approx. 100 feet south of East Valley Parkway centerline to approx. 100 feet north of Bear Valley Parkway	1,100	Two 6-foot by 4-foot culverts	Removal of 8-inch-diameter abandoned water pipeline Relocation of 10-inch-diameter water pipeline Relocation of 24-inch-diameter ductile iron blended water pipeline

Table 1, continued

Roadway	Segment	Approximate Culvert/ Pipeline Length (linear feet)[1]	Culvert Dimensions/ Pipeline Diameter	Existing Utility Lines Requiring Relocation, Adjustment, or Removal
North Rose Street	Escondido Creek to approx. 50 feet south of Escondido Creek bridge crossing	100	Dual 12-foot by 10-foot culvert	None
	Approx. 50 feet south of Escondido Creek bridge crossing to approx. 50 feet north of Valley Parkway centerline	400	8-foot by 8-foot culvert	Relocation of 12-inch-diameter water pipeline
	Approx. 50 feet north of Valley Parkway centerline to approx. 50 feet south of Valley Parkway centerline	100	11-foot by 3-foot culvert	Relocation of 12-inch-diameter water pipeline
	Approx. 50 feet south of Valley Parkway centerline to Grand Avenue	1,300	8-foot by 4-foot culvert	Relocation of 12-inch-diameter water pipeline
East Grand Avenue	Rose Street to an existing concrete storm drainage channel between South Rose Street and Fernwood Avenue	650	Dual 8-foot by 4-foot culvert	None
East Washington Avenue	Approx. 50 feet west of Fern Street centerline to Daisy Street	450	36-inch diameter pipe	None
	Daisy Street to unnamed alley	700	54-inch-diameter pipe	None
Daisy Street	East Washington Avenue to East Mission Avenue	1,300	36-inch diameter pipe	None
Unnamed alley[2]	East Washington Avenue to Escondido Creek	950	54-inch-diameter pipe	None

1 Approximate lengths rounded to the nearest 50 linear feet. Totals may differ due to rounding.
2 Unnamed alley immediately south of East Washington Avenue and north of Escondido Creek, between North Rose Street and Begonia Street.

2.4 Project Construction

Proposed culvert/pipeline construction would entail conventional, open-trench excavation within existing roadways and adjacent sidewalks and rights-of-way. This construction method is typically utilized to install culverts/pipes and their appurtenant structures, which include blow-offs, meters, valves, and vaults. Materials required for culvert/pipeline construction include culverts/pipes; fittings and appurtenances; sand, cement slurry, and natural earth material for backfill; and paving materials. Culvert/pipeline construction using open-trench methods requires the use of concrete/industrial saws, excavators, pavers, compactors, pressure washers, pumps, rollers, rough terrain forklifts, rubber-tired loaders/skid teer loaders, surfacing equipment, tractors/loaders/backhoes, and welders.

In general, the process of culvert/pipeline construction in a roadway would consist of site preparation, excavation and shoring, culvert/pipe installation and backfilling, and street restoration. These construction phases are described as follows:

- **Site Preparation.** The existing pavement along the culvert/pipeline alignment would be cut with a concrete saw or otherwise broken and removed mechanically. The pavement would be transported from the project site to an appropriate facility for recycling or disposal.
- **Excavation and Shoring.** A trench would be excavated along the alignment using backhoes, excavators, or other types of excavation equipment. Portions of the trench adjacent to existing utilities may be manually excavated. Approximately 90,000 cubic yards of soil would be excavated during project construction, which would be hauled off-site for reuse elsewhere in the city or hauled to Miramar Landfill for disposal.[4]
- **Culvert/Pipe Installation and Backfilling.** Once the trench is excavated and shored (if necessary), the culverts/pipes and backfill material would be placed in the trench. Backfill material surrounding the culverts/pipes would include sand bedding, imported aggregate material, or a sand-cement slurry and would buffer the culverts/pipes and soil backfill. The trench would then be backfilled with imported soil (approximately 31,000 cubic yards of soil would be imported during project construction). At the end of each workday, the trench would be covered with steel plates for public safety and so vehicular traffic can resume use of the roadway in both directions.
- **Street Restoration.** Roadway and sidewalk resurfacing would be performed once the entire culvert/pipeline segment is installed. Once the pavement is restored, traffic delineation (striping) would be completed.

Construction of the project is anticipated to commence in the first quarter of 2026 and take approximately 24 months to complete. Given the linear nature of the project, the active construction area would continuously move along the project site at a rate of approximately 50 to 80 linear feet per day.

[4] For purposes of this environmental impact analysis, the reasonable worst-case scenario was used, which would entail hauling all excavated soil to Miramar Landfill, which would require haul trucks to commute approximately 30 miles per one-way trip (or 60 miles per round trip).

Project construction activities would generally occur during the City's allowable construction hours, from 7:00 a.m. to 6:00 p.m. Monday through Friday, excluding federal, state, and City public holidays, pursuant to the City's Noise Ordinance (City of Escondido Municipal Code, Chapter 17, Article 12, Sections 17-234 and 17-238).

Construction would likely result in temporary closures of roadway segments, including vehicular travel lanes, bicycle lanes, and sidewalks on both sides of the road, to ensure public safety in the construction area. Traffic would be detoured around the active construction area using detour signs and/or flag-persons, as appropriate.

2.5 Project Operations

Once construction of the project is completed, the new culverts/pipelines and new points of connection for storm water to enter Escondido Creek would be maintained in a manner similar to existing City drainage infrastructure. Upon completion of this project, more than 1,600 parcels that are currently completely or partially located within the FEMA 100-year floodplain could be redesignated as outside the 100-year floodplain (the City would submit a Conditional Letter of Map Revision to FEMA). Implementation of the project would eliminate the localized flooding within the project area.

2.6 Required Approvals/Entitlements

The proposed project would require the following approvals and permits:

- Adoption of the MND for the purpose of CEQA compliance
- National Environmental Policy Act (NEPA) compliance documentation/approval from FEMA
- Clean Water Act Section 404 Nationwide Permit from USACE
- Clean Water Act Section 401 Water Quality Certification from RWQCB
- California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement from CDFW

FIGURE 1. REGIONAL LOCATION

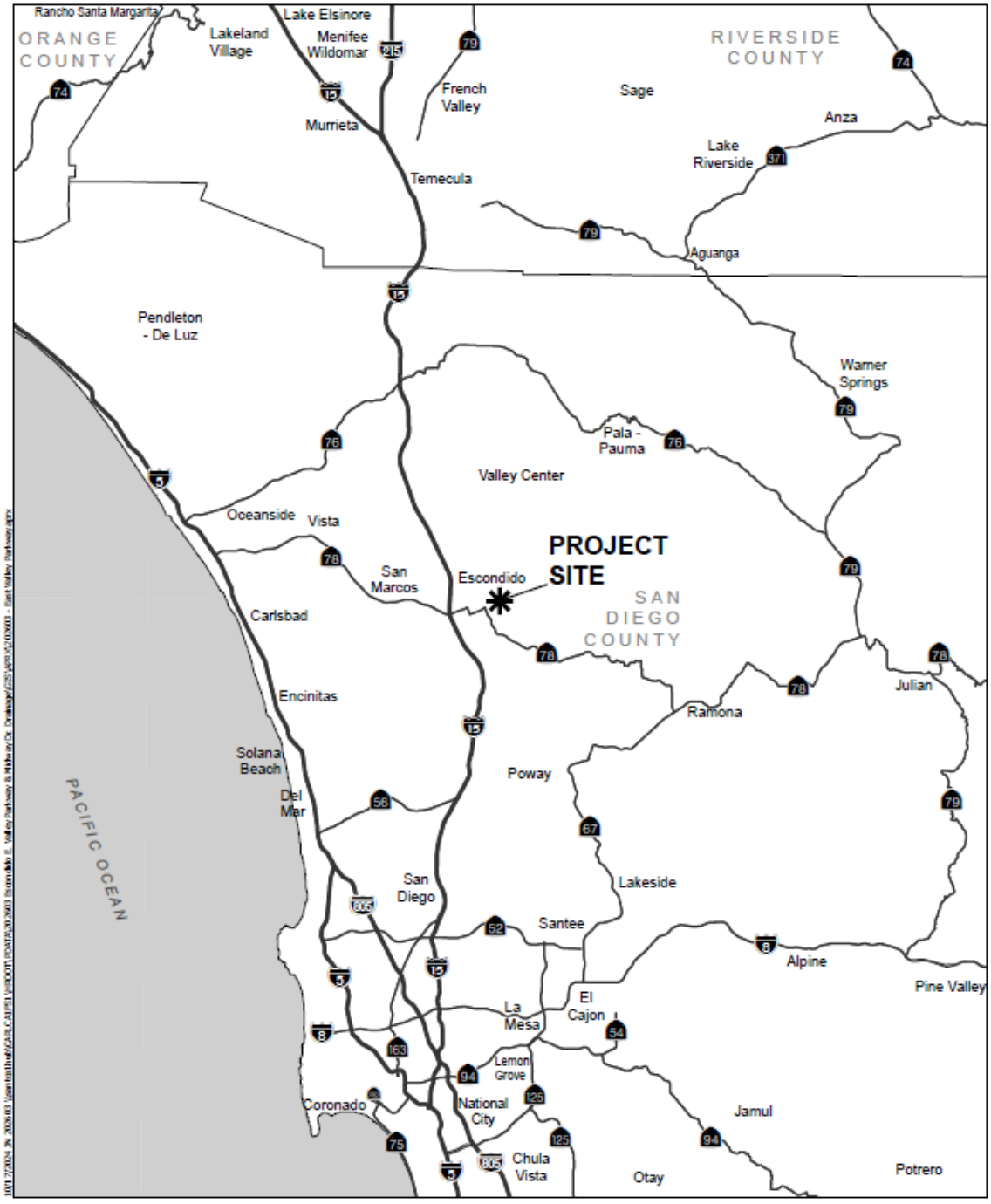
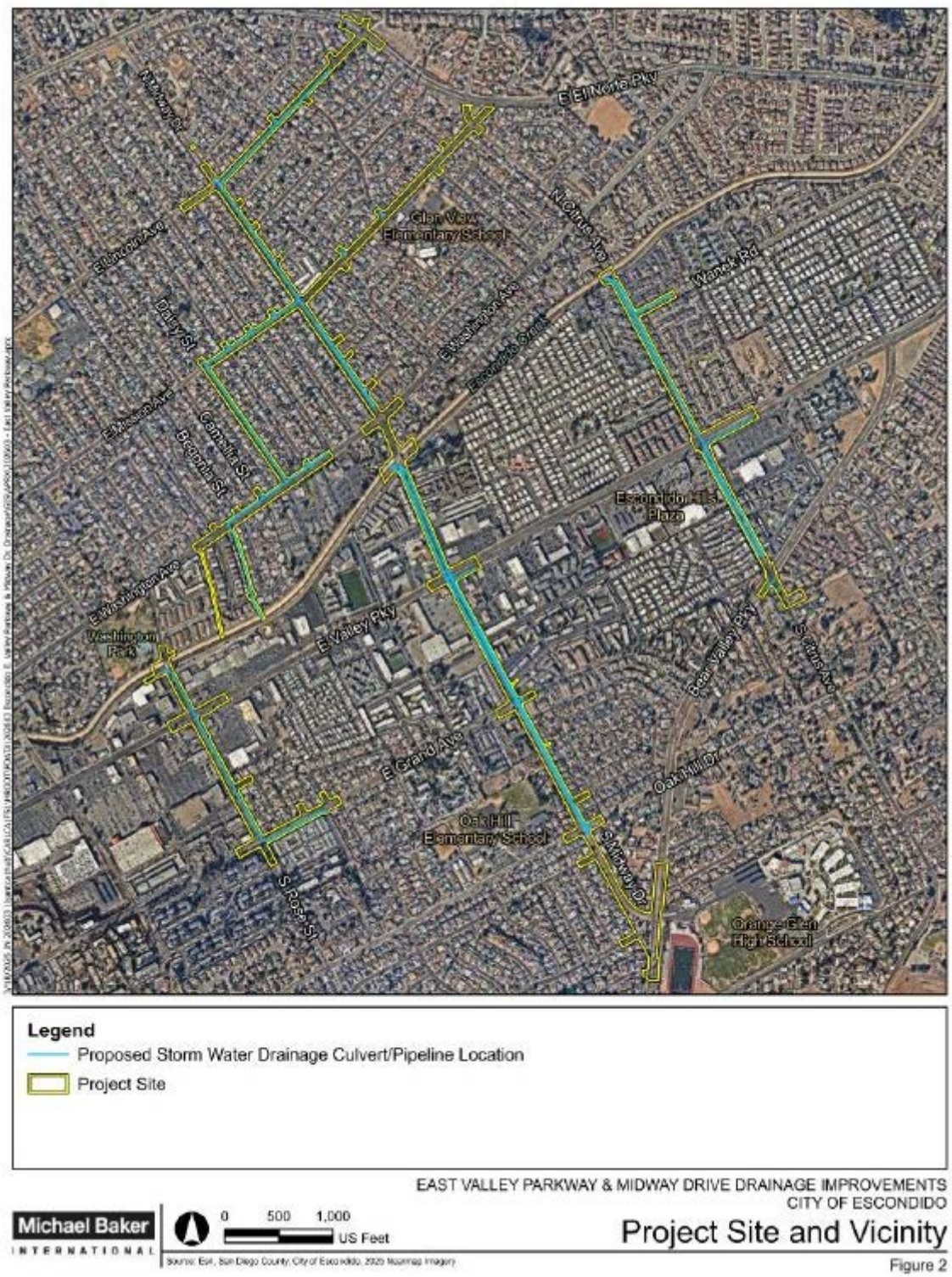


FIGURE 2. PROJECT SITE AND VICINITY



3.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

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

☒ NONE

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

For the evaluation of potential impacts, the questions in the IS Checklist are stated and an answer is provided according to the analysis undertaken as part of the IS. The analysis considers the long-term, direct, indirect, and cumulative impacts of the project. To each question, there are four possible responses:

- **No Impact**. The project would not have any measurable environmental impact on the environment.
- **Less Than Significant Impact**. The project would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant Impact with Mitigation Incorporated**. The project would have the potential to generate impacts which may be considered a significant effect on the environment, although measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- **Potentially Significant Impact**. The project would have impacts which are considered significant, and additional analysis is required to identify measures that could reduce these impacts to less than significant levels.

Determination

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Ivan Flores Digitally signed by Ivan Flores
Date: 2025.09.25 14:21:13 -07'00'

Signature

September 25th, 2025

Date

Evaluation of Environmental Impacts

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS: *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion

a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

No Impact. No scenic vistas occur within the city (City of Escondido 2012a and 2012b). Additionally, the project site, which is located in an urbanized portion of central Escondido, is not visible from a scenic vista. Therefore, construction and operation of the proposed project would not result in a substantial adverse effect on a scenic vista, and no impact would occur.

b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the California Department of Transportation's *State Scenic Highway System Map*, no officially designated or eligible state scenic highways are in the vicinity of the project site. The nearest officially designated state scenic highway to the project site is a segment of State Route 52 located approximately 20 miles to the south (California Department of

Transportation 2024). Additionally, the project involves improvements to an underground storm water drainage system in an urbanized portion of Escondido. Construction of the project may result in removal of some ornamental landscaping trees within public rights-of-way; however, potentially affected trees are not considered to be scenic resources by the City (City of Escondido 2012a). Therefore, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, and no impact would occur.

c) Except as provided in Public Resources Code Section 21099, would the project, 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?

No Impact. The project site is located within public rights-of-way associated with existing roadway corridors and the concrete-lined Escondido Creek in an urbanized portion of Escondido. Roadway corridors in the city do not have a zoning designation, and Escondido Creek is zoned as "Flood Control Channel" (FCC). The proposed project is a drainage improvement project and would therefore not conflict with applicable zoning regulations. Additionally, the project would not conflict with the City's goals and policies regarding visual resources in the Resource Conservation Element of the General Plan, which require the preservation of significant visual resources such as ridgelines, hilltops, steep slopes, rock outcroppings, natural creek areas, lakes, and natural open space areas, as well as the avoidance and minimization of obstructing views of significant visual resources; no such resources are present within or immediately adjacent to the affected alignments. As such, the project would not conflict with applicable zoning and other regulations regarding scenic quality, and no impact would occur.

d) Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. Construction activities associated with the proposed project would be limited to daytime and would not result in a new source of substantial light or glare that would adversely affect views in the project area. No nighttime construction would occur; therefore, nighttime views would not be affected by the project. As described above, the project consists of subterranean drainage infrastructure improvements within an urbanized portion of the city. As such, the operational phase of the project would not introduce any new sources of substantial light or glare. Therefore, no impact would occur.

3.2 Agriculture and Forestry Resources

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

Discussion

a) Would the project 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 project site is located in an urbanized portion of the city, and project construction would be limited to previously developed areas (i.e., existing roadways adjacent to residential, commercial, and institutional uses). According to the California Department of Conservation, the project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The closest Farmland is located more than one mile from the project site (California Department of Conservation 2024a). Additionally, according to the City of Escondido General Plan, no Farmland is present in the project vicinity (City of Escondido 2012a). As such, project implementation would not convert Farmland to a non-agricultural use, and no impact would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is located in an urbanized portion of the city, and project construction would be limited to previously developed areas. The project site is not zoned for agricultural use, and no Williamson Act contract lands occur onsite (California Department of Conservation 2024b). Therefore, project implementation would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

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

No Impact. The project site is located in an urbanized portion of the city, and project construction would be limited to previously developed areas. The project site is not zoned for forest land, timberland, or timberland production (City of Escondido 2024). Thus, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production. No impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Response 3.2(c). Project implementation would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Would the project 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. Refer to Responses 3.2(a) through 3.2(d). Project implementation would not result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

3.3 Air Quality

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

Discussion

This section is primarily based on Appendix A, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. Air quality plans describe air pollution control strategies to be implemented by a city, county, or regional air district. The primary purpose of an air quality plan is to bring an area that does not attain national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) into compliance pursuant to the Clean Air Act and California Clean Air Act. NAAQS and CAAQS have been established for the following criteria pollutants: ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), and lead. O_3 is a photochemical pollutant and needs volatile organic compounds (VOCs), NO_X, and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. Similar to VOCs, ROGs are also precursors in forming O_3. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Also, SO_2 is often used interchangeably with sulfur oxide (SO_X).

The project site is located within the San Diego Air Basin (SDAB), which is governed by the SDAPCD. The SDAPCD and San Diego Association of Governments (SANDAG) are responsible

for developing and implementing air quality management plans for the SDAB, specifically the State Implementation Plan (SIP) and the San Diego County Regional Air Quality Strategy (RAQS). The SIP and RAQS rely on information from the California Air Resources Board (CARB) and SANDAG, including mobile source emissions, area source emissions, and projected growth (CARB 2018, SDAPCD 2016).

The proposed project would not conflict with City land use and zoning designations and would not directly or indirectly generate population or employment growth. Additionally, operation of the project would not generate mobile source or area source emissions. Furthermore, as discussed in Response 3.3(b), below, project-generated air pollutant emissions during construction would be well below the maximum emissions allowed by SDAPCD's significance thresholds. Therefore, the project would not conflict with or obstruct implementation of the SIP or RAQS, and impacts would be less than significant.

b) Would the project 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 SDAPCD has adopted numerical thresholds to analyze the significance of a project's construction and operational emissions. These thresholds are designed such that a project consistent with the thresholds would not have an individually or cumulatively significant impact to the SDAB's air quality. These thresholds are also used by planning agencies and local jurisdictions for comparative purposes when evaluating projects under CEQA. Table 2, *San Diego County Air Pollution Control District Emissions Thresholds*, lists the significance thresholds for temporary construction and long-term operational emissions in the SDAB.

Table 2. San Diego County Air Pollution Control District Emissions Thresholds

Phase	ROG[1] (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_2 (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$[2] (lbs/day)
Construction	75	250	550	250	100	55
Operation	55	250	550	250	100	55

Notes: ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter up to 10 microns; $PM_{2.5}$ = particulate matter up to 2.5 microns; lbs = pounds
1. According to SDAPCD, threshold of significance for ROG is from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley. ROGs are precursors in forming O_3.
2. Based on EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
Source: City of Escondido, *Municipal Code, Chapter 33, Article 47, Environmental Quality*, accessed October 22, 2024.

The thresholds for criteria pollutants listed in Table 2 are used to evaluate whether project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. In the event that emissions exceed these thresholds, modeling would be required to demonstrate that the project's total air quality impacts result in ground-level concentrations below the CAAQS and NAAQS, including appropriate background levels. The SDAB is in nonattainment with federal O_3 (8-hour) standards and state O_3 (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$ standards. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 2, the project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant

impact on the ambient air quality. If project emissions are found to be below the screening-level thresholds, it can be concluded that the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Short-term Construction

The project would be constructed in one phase over a period approximately 24 months, beginning in the first quarter of 2026. As discussed in Appendix A, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*, earthwork would require soil export of approximately 90,000 cubic yards and soil import of approximately 31,000 cubic yards, for a total of 75,000 cubic yards of soil hauling to or from the project site. Exhaust emission factors for typical diesel-powered heavy equipment are based on California Emissions Estimator Model (CalEEMod) version 2022.1 program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site.

The analysis of daily construction emissions has been prepared using CalEEMod. Refer to Appendix A (Air Quality/Greenhouse Gas Emissions/Energy Data) of Appendix A to this IS/MND, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*, for the CalEEMod outputs and results. Table 3, *Short-term Construction Emissions*, presents the anticipated daily short-term construction emissions.

Table 3. Short-term Construction Emissions

Emissions Source	ROG (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_2 (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Year 1 (2026) Construction-Related Emissions[2]	2.76	27.30	32.40	0.08	2.91	1.27
Year 2 (2027) Construction-Related Emissions[2]	2.65	26.30	32.10	0.08	2.84	1.21
Year 3 (2028) Construction-Related Emissions[2]	1.23	8.77	11.70	0.02	0.59	0.37
Maximum Daily Emissions	***2.76***	***27.30***	***32.40***	***0.08***	***2.91***	***1.27***
SDAPCD Thresholds	*75*	*250*	*550*	*250*	*100*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter up to 10 microns; $PM_{2.5}$ = particulate matter up to 2.5 microns; lbs = pounds

1. Emissions were calculated using CalEEMod, version 2022.1. Worst-case scenario between summer and winter conditions is presented as a conservative analysis.
2. Modeling assumptions include compliance with SDAPCD Rule 55, *Fugitive Dust Control*, which requires: properly maintained mobile and other construction equipment; sweeping street more than three times per day; maximum speed limit of 15 miles per hour on unpaved roads, etc., and is included in CalEEMod version 2022.1 as default data.

Source: Refer to Appendix A (Air Quality/Greenhouse Gas Emissions/Energy Data) of Appendix A to this IS/MND, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*, for detailed model data.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions (comprised of coarse particulate matter [particulate matter 10 microns in diameter or less; PM_{10}] and fine particulate matter [particulate matter 2.5 microns in diameter or less; $PM_{2.5}$]) that may have a substantial, temporary

impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways. Fugitive dust from grading and construction would be short-term and would cease upon the completion of project construction.

Construction activities associated with the proposed project would be required to implement emissions control measures detailed in SDAPCD's Rule 55, *Fugitive Dust Control*, which restricts construction activities from creating visible dust emissions at the property line that lasts more than three minutes in any hour and requires the removal of all track-out from the nearby roadways. As depicted in Table 3, with implementation of the emissions control measures included in SDAPCD's Rule 55, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SDAPCD thresholds during project construction. Thus, construction-related impacts associated with fugitive dust would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions (e.g., nitrogen oxides [NO_X], carbon monoxide [CO], and sulfur dioxide [SO_2]) from construction activities include emissions associated with the transport of equipment and materials to and from the project site, emissions produced on-site as the construction equipment is used, and emissions from construction worker vehicles driving to and from the project site. As depicted in Table 3, NO_X, CO, and SO_2 levels generated during project construction would be below the established SDAPCD thresholds. Therefore, air quality impacts from construction equipment and worker vehicle exhaust emissions would be less than significant.

Reactive Organic Gases Emissions

In addition to gaseous and particulate emissions, the application of asphalt and paint creates reactive organic gases (ROG) emissions, which are ozone (O_3) precursors. The project does not propose any buildings and would not require architectural coatings. As depicted in Table 3, ROG would be below the established SDAPCD thresholds. Therefore, construction-related air quality impacts from ROG emissions would be less than significant.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. According to the California Department of Conservation Division of Mines and Geology's *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, serpentinite and ultramafic rocks are not known to occur within the project area (CDCDMG 2000). Additionally, the project would not involve the demolition of buildings that contain asbestos materials. No impact related to asbestos would occur.

Long-term (Operational) Emissions

The project proposes storm water drainage improvements and would not generate vehicle trips after construction is completed, which is a predominant source of air pollutant emissions during the operational phase of a project. Additionally, the project would not include any pump stations or occupied buildings and would not introduce new stationary source emissions; minimal GHG

emissions would be generated from vehicle operation associated with ongoing routine maintenance activities, similar to that which occurs under existing conditions. As the project would not include new mobile sources of emissions or permanent stationary sources, it would not have the potential to generate significant criteria air pollutants emissions from project operation. Therefore, operational impacts associated with criteria pollutants would be less than significant.

Cumulative Impacts

As previously discussed, if emissions exceed the thresholds shown in Table 2 for nonattainment pollutants in the SDAB (O_3, with O_3 precursors NO_X and ROG; PM_{10}; and $PM_{2.5}$), the project could have the potential to result in a cumulatively considerable net increase in these pollutants and, thus, could have a significant cumulative impact on the ambient air quality. However, as shown in Table 3, project emissions would not exceed the significance thresholds and, therefore, would not result in a cumulatively significant increase of nonattainment criteria pollutant emissions. As such, the project's contribution to cumulative air quality impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Toxic Air Contaminants

Construction

If a project has the potential to result in toxic air contaminants (TAC) emissions with a cancer risk greater than 10 in 1 million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. Project construction activities are anticipated to involve the operation of diesel-powered equipment, which would emit diesel particulate matter (DPM). In 1998, CARB identified diesel exhaust as a TAC. Cancer health risks associated with exposure to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed. The project would construct storm water drainage improvements while complying with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimize the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. Implementation of these regulations would reduce the amount of DPM emissions during construction of the proposed project.

The nearest sensitive receptors to the project site are adjacent residential uses, schools, and religious institutions located along the affected roadway alignments. However, health impacts on sensitive receptors associated with exposure to DPM from project construction are anticipated to be less than significant because emissions would be well below the SDAPCD established construction thresholds (refer to Response 3.3[b]). The proposed project would also comply with mandatory regulations, such as SDAPCD Rule 55, *Fugitive Dust Control*. Additionally, emissions would be short-term and intermittent in nature, and construction activities would only occur for a few days adjacent to each sensitive receptor, as the active construction area would progress at a rate of approximately 50 to 80 linear feet per day. Therefore, construction activities would not generate TAC emissions at exposure concentrations high enough to represent a health hazard, and construction-related impacts would be less than significant.

Operational

The project would involve underground storm water drainage improvements to accommodate flood flows and would, therefore, not result in operational activities that would cause potential health risks. Operation of the proposed project is not anticipated to result in TAC emissions to nearby sensitive receptors, and impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). The SDAB is designated as an attainment area for the federal and state CO standards. The federal and state ambient air quality standard for CO is 35 and 20 parts per million (ppm) for one hour, respectively. A potential CO hotspot may occur at any location where the background CO concentration already exceeds 20 ppm.

The closest monitoring station to the project site that monitors CO concentration is the Rancho Carmel Drive Monitoring Site, located approximately 10 miles south of the project site at 11403 Rancho Carmel Drive in San Diego, and the maximum CO concentration in recent years was 2.200 ppm in 2022 (CARB 2024a and 2024b). Because the background maximum CO concentration of 2.200 ppm does not exceed 20 ppm and the proposed project would not generate new vehicle trips during operation, a project-related CO hotspot would not occur. Therefore, no impact associated with a CO hotspot would occur.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Refer to Response 3.3(b) for potential impacts associated with fugitive dust; impacts related to fugitive dust would be less than significant.

Project construction could result in minor amounts of odor associated with diesel exhaust from heavy equipment. This odor would be emitted in various amounts and at various locations along the linear project corridor during construction. The nearest sensitive receptors to the project site are adjacent residential uses, schools, and religious institutions. Odors are highest near the source and would quickly dissipate off-site. Any odors associated with construction would be temporary. Because of the linear nature of the project site, the active construction area would progress at a rate of approximately 50 to 80 linear feet per day, which would limit odor exposure at any given sensitive receptor to no more than a few days. In addition, as previously stated, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimize the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. Therefore, impacts from construction-related odorous emissions would be less than significant. Operation of the proposed project would not be a source of odors. Thus, the potential for odor impacts associated with project operation would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES: *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

This section is based on the project-specific Biological Technical Report and Aquatic Resources Delineation Report dated December 2024 and supplemental memorandum dated March 7, 2025

(Appendix B, *Biological Technical Report, Aquatic Resources Delineation Report, and Supplemental Memo*, Balk Biological, Inc.). The below impact analysis is based on a review of federal and state special-status species databases, a literature review, and field surveys of the biological study area (which includes the project site and a 100-foot-wide buffer area). Biological surveys included general vegetation mapping and general floral and wildlife surveys conducted on September 16, 2024, and an aquatic resources delineation conducted on September 18, 2024.

a) Would the project 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 biological study area is in an urbanized portion of the city, and project construction would be limited to previously developed areas (i.e., existing roadways adjacent to residential, commercial, and institutional uses). No special-status plant species were observed during the general plant survey conducted on September 16, 2024 in the biological study area. Additionally, there are no special-status plant species with a moderate to high potential to occur within the biological study area, which is consistent with the highly urbanized and developed landscape of the project area. As such, special-status plant species are not expected to be present in the project site, and no impact to special-status plant species is anticipated.

One special-status wildlife species, white-faced ibis (*Plegadis chihi*; a CDFW Watch List species [for nesting colonies]), was observed within the biological study area during the general biological survey conducted on September 16, 2024. Three individuals of this species were observed foraging within the shallow freshwater marsh habitat located in the concrete-lined channel of Escondido Creek just outside the project construction area near North Rose Street. White-faced ibis nest in freshwater marsh and forage in shallow water and wet grass (Unitt 2004). No suitable foraging or nesting habitat for white-faced ibis occurs within the project site (i.e., project construction area) and only 0.02 acres of suitable foraging habitat (freshwater marsh) occur within the 100-foot-wide buffer area of the biological study area. The 0.02-acre patch of freshwater marsh within the biological study area is associated with a sediment deposit but because the freshwater marsh occurs below the ordinary high water mark, it is likely a temporary as a storm event or routine maintenance will likely remove it. White-faced ibis nest in colonies and the 0.02-acre patch of freshwater marsh within the biological study area is not suitable for a nesting colony. Two white-faced ibis nesting colonies occur in northern San Diego County at Guajome Lake and in the San Luis River Valley at the mouth of Keys Canyon, and white-faced ibis are frequently observed wintering throughout San Diego County (Unitt 2004). Because no suitable nesting habitat occurs within the biological study area, construction and operation of the proposed project would not significantly impact any nesting colonies of the white-faced ibis. Although a small patch of foraging habitat is present adjacent to the project site, the freshwater marsh located within the concrete-lined channel of Escondido Creek is likely temporary and will be removed with a storm event or routine maintenance. Accordingly, project construction would result in less than significant impacts to white-faced ibis nesting colonies.

Most native nesting birds are protected under the Migratory Bird Treaty Act (16 U.S. Code 703-712), and nesting raptors are afforded additional protection under California Fish and Game Code Section 3503.5. Direct impacts to active nests protected under the Migratory Bird Treaty Act

and/or California Fish and Game Code Section 3503.5 would be considered significant. However, with implementation of the following mitigation measure, potential impacts to nesting birds would be reduced to less than significant levels:

BIO-1: **Preconstruction Nesting Bird Surveys.** If construction activity occurs during the bird nesting season (typically January 1 through August 31), a nesting bird survey shall be conducted within the project construction footprint and a 100-foot-wide buffer within 72 hours prior to construction. Preconstruction nesting bird surveys shall be required anytime construction begins in a new area outside a previously surveyed area. If any active nests are detected, the area shall be flagged and an appropriate buffer will be placed around the nest, as determined by the project biologist, and monitored throughout the nesting cycle. If the project biologist determines that project construction is causing a disturbance to the nest (e.g., adult birds appear agitated and are not returning to nest to incubate or feed young), the biologist may halt construction in the vicinity of the nest until the young have fledged or the nest has failed (is no longer active).

No other special-status wildlife species were determined to have moderate or high potential to occur within the biological study area. The potential for special-status wildlife species to utilize the biological study area is low due to the lack of available native habitat and connectivity to other undeveloped areas.

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

Less Than Significant Impact. The biological study area includes six vegetation communities/land cover types: freshwater marsh, coast live oak woodland, concrete-lined channel, landscaping/ornamental, developed land, and bare ground. However, the project site (i.e., project construction area) includes only three land cover types (0.3 acres of concrete-lined channel, 0.5 acres of landscaping/ornamental, and 55.7 acres of developed land) and does not contain any riparian habitat or sensitive natural communities. Therefore, no direct impacts would occur to riparian habitat or sensitive natural communities.

Project construction could result in indirect effects to nearby sensitive natural communities (i.e., freshwater marsh and coast live oak woodland), such as from fugitive dust and increased human activities. However, with compliance with applicable SDAPCD regulations (e.g., watering of exposed soil and limiting vehicle speeds on exposed soils) would ensure project-related fugitive dust would not interfere with photosynthesis, respiration, and transpiration of plants within nearby riparian habitat or sensitive natural communities. Additionally, the temporary increase in human activity on the project site would cease once construction is completed. As such potential indirect impacts to riparian habitat and sensitive natural communities would be less than significant.

c) Would the project 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. The project site does not contain any federal or state wetlands; however, the project site includes 0.18 acres (585 liner feet) of

potential non-wetland waters of the U.S. under the jurisdiction of USACE and RWQCB and 0.976 acres (602 linear feet) of potential non-wetland waters of the state under the jurisdiction of CDFW within the concrete-lined channel of Escondido Creek. Construction of the four new points of connection for storm water to enter Escondido Creek may impact potential aquatic resources although the project would result in no loss of jurisdictional waters as the concrete-lined channel would be restored to its original function during project construction. If construction of the project would result in direct removal, fill, and/or hydrological interruption of potential aquatic resources, such a temporary impact could potentially be significant. However, with implementation of the following mitigation measure, potential impacts to aquatic resources would be reduced to less than significant levels:

BIO-2: **Potential Aquatic Resources Permitting.** Impacts to potential aquatic resources requires notification to the relevant federal and state agencies. The City of Escondido shall obtain the required federal and/or state permits from the USACE, RWQCB, and/or CDFW, pursuant to Sections 404 and 401 of the Clean Water Act and Section 1600 et seq. of the California Fish and Game Code, respectively. Permits are required to be obtained by the City of Escondido before the impact to the resources. Permits may include additional conditions of approval.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. The Escondido Subarea Plan for the San Diego Multiple Habitat Conservation Program (MHCP) identifies five large areas of natural habitats located in the northeastern, eastern, southern, southwestern, and northwestern portions of the city (Ogden Environmental and Energy Services Company, Inc. and Conservation Biology Institute 2001).

The project site is in an urbanized portion of the city, and project construction would be limited to previously developed areas (i.e., existing roadways adjacent to residential, commercial, and institutional uses). The project site is not located within a designated Biological Core Linkage Area. According to the Escondido Subarea Plan, the Biological Core Linkage Area is equivalent to a biologically preferred preserve alternative because it identifies all large, contiguous areas of habitat and important functional linkages and movement corridors between them (Ogden Environmental and Energy Services Company, Inc. and Conservation Biology Institute 2001). Human activity and substantial vehicular traffic within and surrounding the project site inhibit wildlife movement through the project site. Escondido Creek, which traverses the project site, may allow some terrestrial wildlife to move through the city; however, the urban development that occurs on either side of Escondido Creek is a deterrent to wildlife mobility and it is expected that wildlife movement most likely occurs in the areas identified in the Biological Core Linkage Area, and not within the project site and adjacent areas.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. Escondido Municipal Code Section 33-1068.B, *Restrictions on Removal of Vegetation*, requires a vegetation removal permit for the removal of vegetation (i.e., mature trees, protected trees, and sensitive biological habitat) on developed and undeveloped lots of less than two acres in size, prior to clearing, pruning, or destroying of sensitive biological species, sensitive biological habitat, protected trees, and/or required landscaping. The project site is in an urbanized portion of the city and does not contain any sensitive biological habitat. Furthermore, project construction would be limited to previously developed areas (i.e., existing roadways adjacent to residential, commercial, and institutional uses) and would not result in the removal of protected or mature trees. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site is located within the Escondido Subarea of the MHCP. The MHCP was adopted and certified by the San Diego Association of Governments in March 2003 with the intent that each participating northern San Diego County jurisdiction would implement its respective portions of the MHCP through citywide subarea plans. However, the Draft Escondido Subarea Plan has yet to be adopted. Nonetheless, the project site and surrounding areas are not located within any City MHCP Focused Planning Areas. Therefore, the project would not conflict with the MHCP or the Draft Escondido Subarea Plan. No other approved local, regional, or state habitat conversation plan is applicable to the project site. No impact would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES: *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion

This section is based on the project-specific Cultural Resource Assessment (Appendix C, *Cultural Resources Assessment*, Michael Baker International, dated December 2, 2024). The below impact analysis is based on a California Historical Resources Inventory System (CHRIS) records search conducted at the South Coastal Information Center (SCIC) on August 30, 2024; literature and historical map review; historical society consultation; field survey conducted on October 8, 2024; historical resource evaluation; and buried archaeological site sensitivity analysis. The CHRIS records search at the SCIC was conducted to identify previous cultural resources studies and previously recorded cultural resources within a 0.5-mile radius of the project site. The CHRIS search results provided a review of the Built Environment Directory, California Inventory of Historic Resources, California Points of Historical Interest, California Historical Landmarks, and Archaeological Determinations of Eligibility for San Diego County.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Based on the records search results, literature review, historical map review, and pedestrian field survey, no historic resources were identified within the project limits. While the literature review found that seven built environment resources have been documented within the vicinity of the project limits during previous studies, they would not be directly or indirectly impacted with project implementation, as they are located outside the limits of disturbance. Given that the project would not require removal of any existing buildings, and based on the distance of known historical resources from the project site and lack of identified historical resources onsite, project development would not result in a substantial adverse change to the significance of a historical resource. No impact would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the Cultural Resource Assessment for the proposed project, no archaeological resources have been recorded within the project site or within the vicinity. Despite having low archaeological sensitivity due to the built-out nature of the project area, the potential remains for discovery of undocumented archaeological resources during earth-moving activities (i.e., trenching). However, with implementation of the following mitigation measures, potential impacts to archaeological resources would be reduced to less than significant levels:

CUL-1: **Archaeological and Native American Monitoring.** An archaeological monitor meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738) and a Native American monitor representing one of the consulting tribes shall be present during ground-disturbing activities for project construction, including, but not limited to, site clearing, grubbing, demolition, boring, trenching, and excavation.

Because soil underlying the construction area has been previously disturbed during the development of the roads and utility infrastructure, the archaeological monitor, in consultation with the Native American monitor, may determine that soils are sterile for resources. Upon such determination, monitoring frequency may be reduced or halted.

The archaeological and Native American monitors shall log all monitoring activity and provide monitoring logs to the City on a minimum bi-weekly basis. If a discovery is made, the archaeological monitor shall notify the City within 24 hours.

A final compiled monitoring report shall be submitted to the City that documents monitoring activities conducted by the archaeological and Native American monitors within 60 days of completion of monitoring. The report shall document impacts to any known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; and, in a confidential appendix, include the monitoring logs. The final monitoring report shall be submitted to the City, the South Coastal Information Center, and any consulting tribes.

CUL-2: **Unanticipated Discoveries.** If a potentially significant archaeological resource is unearthed during excavation activities, work shall stop immediately within 100 feet of the find and the discovery shall be evaluated by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738), pursuant to the procedures set forth at California Environmental Quality Act Guidelines Section 15064.5. If the resource is determined not significant, no further work is needed. If the find is deemed to be potentially significant, the City shall make a determination of significance on the basis of the recommendations of the qualified archaeologist and submit this determination of significance to the consulting tribe(s) for review and comment. The consulting tribe(s) shall be notified within 24 hours of the discovery via email and phone. The consulting tribe(s) shall be allowed access to the discovery, in order to assist with the significance evaluation. Depending on the nature of the find, the determination of significance may

require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan and excavation. Repatriation (i.e., re-bury resources) shall be the preferred method of resource treatment for any tribal cultural resources. The City shall consult with the consulting tribe(s) to determine culturally appropriate repatriation locations and practices. The contents and location of repatriated resources shall be recorded to avoid future disturbance, but kept confidential.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Given the urbanized nature of the project area, it is unlikely that construction of the proposed project would result in the disturbance of human remains. Nonetheless, in the unlikely event that human remains are discovered during project construction, the City will comply with State of California Health and Safety Code Sections 7050.5-7055. All ground disturbance will be required to stop within 50 feet of the discovery, and the contractor shall notify the City immediately. The City will then notify the San Diego County coroner. If the coroner determines the remains are human and of Native American descent, in compliance with Section 5097.98 of the California Public Resources Code, the coroner will notify the Native American Heritage Commission, which will identify the legal most likely descendant to take custody of the remains. Through project compliance with the State of California Health and Safety Code, potential impacts to human remains would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
ENERGY: *Would the project:*				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

This section is primarily based on Appendix A, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*.

Significance Thresholds

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines includes the following criteria:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the project complies with existing energy standards.
- **Criterion 5**: The effects of the project on energy resources.
- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage addresses Criterion 1. The discussion of construction-related energy use focuses on Criteria 2, 4, and 5. The operational transportation energy demand analysis discusses Criteria 2, 4, and 6, and the operational building energy demand analysis discusses Criteria 2, 3, 4, and 5.

a) Would the project 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. The project proposes storm water drainage improvements within a portion of the city. The following analysis focuses on the on-road (automotive) fuel consumption associated with project-generated construction vehicle trips and off-road fuel consumption associated with construction equipment usage. The estimated construction fuel consumption is based on the project's anticipated construction equipment list, timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. Since the project would not include any habitable buildings with natural gas or electricity consumption and would not generate any vehicle trips during operation, other than for maintenance and repair, similar to that which occurs under existing conditions, the project would not consume energy during the operation phase (CEQA Guidelines Appendix F – Criteria 2 through 6).

Table 4, *Project and Countywide Energy Consumption*, summarizes the project's estimated energy consumption. As shown in Table 4, the project's construction off-road equipment and construction on-road fuel consumption would increase the County's overall consumption by 0.4189 and 0.0028 percent, respectively, which represents a nominal energy consumption increase over the County's existing consumption (CEQA Guidelines Appendix F – Criterion 1).

Table 4. Project and Countywide Energy Consumption

Energy Type: Fuel Consumption During Construction	Project Annual Energy Consumption[1]	San Diego County Annual Energy Consumption[2]	Percentage Increase Countywide
Construction Off-Road Fuel Consumption	62,386 gallons	14,892,532 gallons	0.4189%
Construction On-Road Fuel Consumption	44,424 gallons	1,564,725,141 gallons	0.0028%

Notes:
1. As modeled in CalEEMod version 2022.1.
2. The project's construction and operational automotive fuel consumption is compared with the projected Countywide fuel consumption in 2026 (construction start year).
3. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the CARB EMFAC2021 model.

Refer to Appendix A (Air Quality/Greenhouse Gas Emissions/Energy Data) of Appendix A to this IS/MND, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*, for assumptions used in this analysis.

Fossil fuels necessary for construction vehicles and other energy-consuming equipment would be used during project construction activities. Fuel energy consumed during construction would be short-term and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with state requirements that heavy-duty diesel equipment, not in use for more than five minutes, must be turned off. Project construction equipment would also be required to comply with the latest Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and project owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (CEQA Guidelines Appendix F – Criterion 4).

The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, culverts, pipes, and manufactured or processed materials would not substantially increase demand for energy compared to overall local and regional demand for construction materials. As indicated in Table 4, the project's fuel consumption from off-road construction equipment use would be approximately 62,386 gallons, which would increase fuel use in the County by 0.4189 percent. Also indicated in Table 4, the project's fuel consumption from on-road construction vehicle use would be approximately 44,424 gallons, which would increase fuel use in the County by 0.0028 percent. As such, construction would have a nominal effect on the local and regional energy supplies (CEQA Guidelines Appendix F – Criterion 2). Construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or state (CEQA Guidelines Appendix F – Criterion 5). Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, project impacts related to energy would be less than significant impact.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As a storm water drainage improvement project with minimal energy consumption during construction and no new energy consumption during operation, the project is not anticipated to conflict with or obstruct any state plan for renewable energy or energy efficiency. Specifically, as shown in Table 4, the project's off-road fuel consumption and on-road fuel consumption from construction would increase San Diego County's consumption by approximately 0.4189 and 0.0028 percent, respectively. Further, the project would be required to adhere to all applicable federal, state, and local requirements pertaining to energy efficiency during construction. In addition, project implementation would not result in increased operational electricity, natural gas, or fuel consumption compared to existing conditions. Therefore, project-related energy impacts would be less than significant.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS: *Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

This section is based on the project site-specific Preliminary Geotechnical Evaluation (Appendix D, *Preliminary Geotechnical Evaluation*, Allied Geotechnical Engineers, Inc., dated November 22, 2024).

a-i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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. As stated in the City of Escondido General Plan EIR, the city is not located on any known active or potentially active faults as defined by the California Geological Survey and is not located within an Alquist-Priolo Earthquake Fault Zone (City of Escondido 2012a, City of Escondido 2021b, and California Department of Conservation 2024c). The nearest active fault to the project area is the Newport-Inglewood-Rose Canyon Fault and the Elsinore Fault, which are identified as Alquist-Priolo earthquake faults, located approximately 18 miles northeast of the project area. According to the City of Escondido General Plan EIR, significant impacts from a fault rupture could occur within 50 feet of an Alquist-Priolo fault (City of Escondido 2012a and City of Escondido 2021b). Further, the project would be required to conform with current seismic structural design standards of the California Code of Regulations Title 24 (California Building Standards Code [CBC]) to ensure stability and minimize potential adverse effects from potential ground rupture. Additionally, the project involves improvements to the underground storm water drainage system and does not propose any habitable structures. As such, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be less than significant.

a-ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. Refer to Response 3.7(a)(i), above. The project site is located in a seismically active area of Southern California, and a seismic event along the Newport-Inglewood-Rose Canyon Fault or the Lake Elsinore Fault could result in seismic ground shaking at the project site. Seismic ground shaking may have the potential to affect the proposed underground storm water drainage improvements. However, project compliance with seismic design standards identified in the current version of the CBC would minimize potential adverse effects, including the risk of loss, injury, or death from strong seismic ground shaking. As such, impacts would be less than significant.

a-iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking due to a sudden increase in pore water pressure, which causes the soils to lose strength and behave as a liquid (City of Escondido 2012a and City

of Escondido 2012b). As stated in the Preliminary Geotechnical Evaluation for the project site, it is anticipated that groundwater elevation in the project site is heavily influenced by the water level in Escondido Creek. During heavy regional precipitation event, groundwater levels in the vicinity of Escondido Creek are likely raise to an elevation of a few feet beneath the existing ground surface. According to Figure 4.6-3, *Liquefaction Hazard Areas*, from the City of Escondido General Plan EIR, portions of the project area are susceptible to liquefaction due in part to the project area's proximity to Escondido Creek (City of Escondido 2012a and City of Escondido 2012b). The area identified as a Liquefaction Hazard Area is generally restricted to a linear corridor along Escondido Creek bound by East Washington Avenue and East Valley Parkway. As discussed in the Preliminary Geotechnical Evaluation for the project site, the liquefiable zones are deepest in the vicinity of Escondido Creek and are estimated to be on the order of 20 feet maximum. Nonetheless, the project would be required to comply with all relevant state and local regulations and construction standards, including seismic structural design requirements identified in the current CBC. Project compliance with relevant seismic design standards and regulations would ensure impacts regarding seismic-related ground failure, including liquefaction, would be less than significant.

a-iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less Than Significant Impact. According to the City of Escondido General Plan EIR, Figure 4.6-4, *Landslide Hazard Area*, there are no soils susceptible to landslide hazards on or adjacent to the project site (City of Escondido 2012a and City of Escondido 2012b). Additionally, as discussed in the project site-specific Preliminary Geotechnical Evaluation, the project site is not located on or below any known (mapped) ancient landslides and the site is not located in an area that is susceptible to landslide hazards. Further, the project site is generally flat and does not include substantial slopes or features that would increase the landslide potential on the project site. Therefore, the proposed project would not cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Potential impacts involving landslides would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project site has been previously disturbed and is in an urbanized area. Construction activities involving soil disturbance, such as excavation, stockpiling, and grading, could result in short-term erosion of exposed soils by wind and/or water. The project would comply with the provisions of City Municipal Code Chapter 33, Article 55, *Grading and Erosion Control* (Grading and Erosion Control Ordinance) which contains grading regulations. Furthermore, pursuant of the City's Municipal Code Chapter 22, Article 2, Section 22-26, *Reduction of Pollutants in Stormwater*, prior to any activities that may result in pollutants entering a municipal separate storm sewer system, the project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for approval by the City Engineer prior to construction. The SWPPP would identify best management practices (BMPs) to be implemented during project construction to prevent erosion, minimize siltation, and protect water quality. Adherence to the BMPs in the SWPPP would minimize soil erosion from project-related construction activities. With implementation of the SWPPP and its associated BMPs, project construction would result in a less than significant impact involving soil erosion and loss of topsoil.

Operation of the proposed project would not result in exposure of bare soils as all areas disturbed during project construction would be resurfaced after installation activities associated with the proposed underground storm water drainage infrastructure. As such, the project would not result in soil erosion or the loss of topsoil during operation, and no impact would occur.

c) Would the project 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. Refer to Responses 3.7(a)(iii), 3.7(a)(iv), and 3.7(d) for discussion concerning the project's potential to result in on- or off-site liquefaction, landslides, and expansive soils, respectively. Ground collapse can also potentially occur due to liquefaction, landslides, and expansive soils; however, for the reasons stated in Responses 3.7(a)(iii), 3.7(a)(iv), and 3.7(d), potential impacts related to collapse would be less than significant. The project's potential to result in lateral spreading and subsidence are discussed below.

Lateral Spreading

Lateral spreading is a phenomenon in which shallow, water-saturated soils move downslope on a liquefied soil layer. As stated in the City of Escondido General Plan EIR, San Diego County, including the project area, has no known cases of lateral spreading resulting in damage to property or structures (City of Escondido 2012a and City of Escondido 2012b). Nonetheless, the project site-specific ***Preliminary Geotechnical Evaluation*** (Appendix D) states that the risk of lateral spread displacement due to a major seismic event in the vicinity of Escondido Creek during high groundwater levels is considered high. However, compliance with applicable state and local construction standards and regulations, including the CBC, would reduce the potential for the project to result in lateral spreading on or off the project site. Potential impacts would be less than significant.

Subsidence

Subsidence, which can be caused by groundwater depletion, seismic activity, and other factors, refers to elevation changes of the land whether slow or sudden. According to the City of Escondido General Plan EIR, the underlying geologic formations of San Diego County, including the city, are mostly granite and have a very low potential for subsidence (City of Escondido 2012). Nonetheless, the project would be required to demonstrate compliance with applicable CBC design requirements to reduce potential impacts related to unstable soil conditions. As such, compliance with CBC design requirements would result in a less than significant impact in regard to subsidence.

Conclusion

In summary, the project site is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential impacts related to landslides, lateral spreading, subsidence, liquefaction, and collapse would be less than significant.

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

No Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can result in damages by cracking foundations, causing settlement, and distorting structural elements. According to Figure 4.6-5, *Expansive Soils*, from the City of Escondido General Plan, soils in the project area are not identified as expansive. In addition, the project-specific *Preliminary Geotechnical Evaluation* (Appendix D) states that the project site is not located in areas underlain by expansive soils (AGE 2024). Therefore, the project would not result in substantial direct or indirect risks to life or property due to expansive soils, and no impact would occur.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project involves storm water drainage system improvements and does not propose development of residential or other land uses that would generate the need for the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation. The project site has been previously disturbed and is in an urbanized area. The project's proposed infrastructure would be installed beneath existing roadways and other public rights-of-way, where other underground utilities have previously been installed. As such, it is anticipated that the majority of soils encountered during project excavation activities would be composed of fill material. However, there may be some locations along the project site where the depth of the proposed culvert/pipeline may encounter native soils. According to Figure 4.5-2, *Geological Formations*, from the City of Escondido General Plan EIR, native soils in the project area include old alluvial valley deposits, young alluvial valley deposits, and granitic and other intrusive crystalline rocks of all ages. Old alluvial valley deposits are identified as having a moderate potential for paleontological resources, while young alluvial valley deposits are identified as having a low potential for paleontological resources. Granitic rocks are considered to have no potential for paleontological resources. Thus, paleontological sensitivity on the project site is assumed to be low to moderate, and project excavation activities may encounter native soils that have the potential to support unknown buried paleontological resources. As such, disturbance into native soils on the project site could potentially result in significant impacts to paleontological resources.

Prior to the commencement of ground-disturbing activities, mitigation measure GEO-1 would require the project Applicant to retain a qualified paleontologist to conduct full-time paleontological monitoring during all ground-disturbing activities in areas with the potential to support unknown buried paleontological resources. In the event that paleontological resources are encountered during project construction, mitigation measure GEO-1 would also require all project construction activities to halt until a qualified paleontologist evaluates the paleontological significance of the

find and recommends a course of action. Thus, with implementation of the following mitigation measure, impacts would be reduced to less than significant levels:

GEO-1: **Paleontological Resources Construction Monitoring.** Prior to the commencement of excavation activities, the City of Escondido shall retain a Society of Vertebrate Paleontology (SVP) qualified paleontologist (i.e., professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research and at least four months of supervised field and analytic experience in general North American paleontology as defined by the SVP) to conduct full-time paleontological monitoring during excavation activities in areas with the potential to support unknown buried paleontological resources. Monitoring logs shall be submitted monthly to the City of Escondido Director of Development Services, or their designee.

A final report shall be prepared describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and/or laboratory methods, an overview of the project site geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City of Escondido Director of Development Services, or their designee. If the monitoring efforts produced fossils, a copy of the report shall also be submitted to the designated museum repository.

If evidence of subsurface paleontological resources is found during construction activities, excavations within 50 feet of the find shall cease and the construction contractor shall contact the City of Escondido Director of Development Services, or their designee. With direction from the City of Escondido Director of Development Services, or their designee, a qualified paleontologist shall be retained to evaluate the find prior to resuming construction activities in the immediate vicinity of the find. If the City of Escondido determines the resource is significant and cannot be immediately recovered, the qualified paleontologist shall prepare and execute a Paleontological Resources Mitigation Program (PRMP) for the salvage and curation of the identified resource(s). The PRMP shall specify the fieldwork and laboratory methods to be undertaken, curation requirements, proposed staff qualifications, and whether the entire resource is to be collected or a specified statistically significant sample.

3.8 Greenhouse Gas Emissions

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

Discussion

This section is primarily based on Appendix A, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*. The project-specific technical memorandum is based on a preliminary version of the proposed project, which included smaller construction trench widths and smaller widths/diameters of culverts/pipelines, meaning that the actual amount of surface disturbance (including pavement removal) and soil cut/fill would be approximately doubled from that assumed in the project-specific technical memorandum. However, even with the doubling of surface and soil disturbance during construction, potential greenhouse gas (GHG) emissions would remain well below the applicable significance thresholds.

Background

The natural process through which heat is retained in the troposphere[5] is called the "greenhouse effect." The greenhouse effect traps heat in the troposphere. This "trapping" of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

California is a substantial contributor of global GHGs, emitting approximately 371.1 million metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2022, which is 9.3 $MMTCO_2e$ lower than 2021 levels.[6] A carbon dioxide equivalent (CO_2e) is a metric measure used to compare the emissions from various GHGs based on their global warming potential. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the global atmosphere is mostly independent of the point of emission. Every state in the U.S. and every nation emits GHGs and, as a result, makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions

[5] The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface to 10 to 12 kilometers.

enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 ppm. For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of September 2024, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 427 ppm (Scripps 2024).

The Intergovernmental Panel on Climate Change constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm CO_2e concentration is required to keep global mean warming below 2 degrees Celsius (3.8 degrees Fahrenheit), which in turn is assumed to be necessary to avoid dangerous climate change.

Regulatory Setting

This section includes information pertaining to the most currently relevant regulations associated with the reduction of GHG emissions. For a detailed discussion of applicable federal, state, and regional regulations related to the reduction of GHG emissions, refer to Appendix A, ***Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum***.

Assembly Bill 32 - California Global Warming Solutions Act of 2006, Senate Bill 32 - California Global Warming Solutions Act of 2016, and CARB Climate Change Scoping Plans

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and required CARB to prepare a Climate Change Scoping Plan that outlines the main state strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 required CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 $MMTCO_2e$. To implement AB 32, the first Climate Change Scoping Plan (2008 Scoping Plan) was approved by CARB on December 11, 2008, and included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG emissions reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade Program) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the 2008 Scoping Plan, the 2013 Scoping Plan, which defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan and evaluated how to align the State's longer-term GHG emissions reduction strategies with other

state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.

Senate Bill (SB) 32, signed into law on September 8, 2016, extended AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remained unchanged). In December 2017, CARB adopted the 2017 Scoping Plan (an update to the 2013 Scoping Plan), which provided a framework for achieving the 2030 target. The 2017 Scoping Plan relied on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of then recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan, the 2017 Scoping Plan did not provide project-level thresholds for land use development. Instead, it is recommended that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of no more than 6 metric tons of carbon dioxide equivalents ($MTCO_2e$) by 2030 and 2 $MTCO_2e$ by 2050.

In response to the passage of AB 1279 and the identification of the 2045 GHG emissions reduction target, CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) in December 2022. The 2022 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying a new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Scoping Plan includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Scoping Plan assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; and implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, as well as taking an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Scoping Plan, "the plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the State's natural and working lands and using a variety of mechanical approaches." In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Scoping Plan includes emissions and carbon sequestration in natural and working lands and explores how they contribute to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. The Cap-and-Trade Program continues to substantially contribute to the reduction of near-term emissions to meet the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet the identified GHG emissions reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375 - 2008 Sustainable Communities and Climate Protection Act

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the State's 18 major metropolitan planning organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. On December 10, 2021, SANDAG, which serves as the metropolitan planning organization for the San Diego region, adopted its 2021 Regional Transportation Plan/Sustainable Communities Strategy, also known as *San Diego Forward: The Regional Plan* (2021 Regional Plan). SANDAG provided CARB a complete submittal of the 2021 Regional Plan and all necessary supporting information on March 16, 2022. It was determined that the 2021 Regional Plan (i.e., the SCS) achieves the regional targets, as adopted by CARB in 2018, to reduce GHG emissions from passenger vehicle use by 15 percent by 2020 and 19 percent by 2035, compared to 2005 levels (CARB 2022).

San Diego Association of Governments 2021 Regional Plan

The 2021 Regional Plan combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan, which complies with specific state and federal mandates that achieve GHG emission reduction targets set by CARB; compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process.

As the regional transportation planning agency, SANDAG continues to implement regional transportation control measures to reduce motor vehicle use, thereby reducing emissions and improving air quality. The measures expand access to public transit, vanpools, and park-and-ride/bicycle facilities, and include enhancements to the regional high-occupancy vehicle lane system.

Every four years, SANDAG researches and updates the Regional Plan of all future strategies to enhance the movement of people and goods within the region. SANDAG is currently in the process of developing more concrete details of the Draft 2025 Regional Plan. This comprehensive document will describe the transportation projects, programs, and policies while describing how SANDAG will pay for them, how the plan will cooperate with other local planning documents, a technical analysis of how the plan could impact the environment, and more.

City of Escondido Climate Action Plan

The City of Escondido Climate Action Plan (CAP) was adopted in March 2021. The CAP provides a roadmap for reducing GHG emissions through the implementation of various strategies, goals, actions, and supporting measures. The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist) and Guidance for Demonstrating Consistency with the City of Escondido CAP to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. The CAP Consistency Checklist summarizes the methodology and

application of a GHG screening threshold of 500 $MTCO_2e$ per year for new development projects to determine if a project would need to demonstrate consistency with the CAP.

Significance Thresholds

The determination of the significance of GHG emissions calls for a careful judgment by the lead agency (CEQA Guidelines Section 15064.4[a]). A lead agency has the discretion to determine whether to quantify GHG emissions and/or rely on a qualitative analysis or performance-based standards (CEQA Guidelines Section 15064[a][1]-[2]). CEQA does not compel a numeric estimate of every project's GHG emissions (*Mission Bay Alliance v. Office of Community Investment and Infrastructure* [2016] 6 Cal.App.5th 160, 201). "Given the nature of greenhouse gas emissions—gases that trap heat in the atmosphere, contributing to global climate change but with little immediate perceptible effect on the locale from which they emanate—a project's compliance with an area-wide greenhouse gas reduction plan may be more useful in determining the significance of those emissions on a global scale than quantification of its incremental addition to greenhouse gas emissions" (Id. [internal citations omitted]).

As previously stated, the City's CAP is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a CAP. Projects that are consistent with the General Plan and implement applicable CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. Conversely, projects that are consistent with the General Plan, but do not implement CAP GHG reduction measures, as well as General Plan Amendments and Annexations that increase emissions beyond CAP projections, would require a project-level GHG analysis. The City's CAP establishes a GHG screening threshold of 500 $MTCO_2e$ per year for new development projects to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. Projects that exceed the established CAP threshold of 500 $MTCO_2e$ per year would need to showcase consistency to CAP measures.

In addition to determining consistency with the City's CAP Consistency Checklist, the methodology for evaluating the project's potential impacts related to GHG emissions focuses on its consistency with applicable plans adopted for the purpose of reducing and/or mitigating GHG emissions. This analysis also quantifies the project's potential GHG emissions.

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

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

a) and b) Less Than Significant Impact.

Greenhouse Gas Emissions

As a storm water drainage improvement project, the only direct project-related GHG emissions would occur during construction activities. CalEEMod version 2022.1 was used to calculate project-related construction GHG emissions. Construction is anticipated to take approximately 24 months to complete. After construction, the storm water drainage improvements would not include

any pump stations or occupied buildings and would not introduce new stationary source GHG emissions; minimal GHG emissions would be generated from vehicle operation associated with ongoing routine maintenance activities, similar to that which occurs under existing conditions. CalEEMod outputs are contained within Appendix A, (Air Quality/Greenhouse Gas Emissions/Energy Data) of Appendix A of this IS/MND, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*. Table 5, *Estimated Greenhouse Gas Emissions*, presents the estimated GHG emissions associated with the project.

Table 5. Estimated Greenhouse Gas Emissions

Source	CO_2 (MT/yr[1])	CH_4 (MT/yr[1])	N_2O (MT/yr[1])	Refrigerants (MT/yr[1])	CO_2e (MT/yr[1])
Direct Emissions					
Total Construction GHG Emissions	1,694.50	0.08	0.13	0.79	**1,733.60**
Construction (amortized over 30 years)	56.48	<0.01	<0.01	0.03	**57.79**
Total Project Construction Emissions	***57.79***				

Notes: MT/yr = metric tons per year
1. Emissions calculated using CalEEMod Version 2022.1; totals may be slightly off due to rounding.
Source: Refer to Appendix A (Air Quality/Greenhouse Gas Emissions/Energy Data) of Appendix A to this IS/MND, *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum*, for assumptions used in this analysis.

Construction GHG emissions are amortized over 30 years (i.e., total construction emissions divided by the lifetime of the project, assumed to be 30 years), as recommended by SCAQMD.[7] As shown in Table 5, the project would result in 57.79 $MTCO_2e$ per year in construction-related GHG emissions when amortized over 30 years, or a total of 1,733.60 $MTCO_2e$ in 30 years. Therefore, the project would result in 57.79 $MTCO_2e$ per year, which would not exceed the City CAP's GHG screening threshold of 500 $MTCO_2e$ per year. As such, the CAP Consistency Checklist is not required for the project, and impacts associated with GHG emissions would be less than significant.

Consistency With Applicable Plans

As a storm water drainage improvement project with minimal construction GHG emissions, the project is not anticipated to conflict with or obstruct any applicable plans adopted for the purpose of reducing emissions of GHG. Specifically, as shown in Table 5, project-related GHG emissions would be approximately 57.79 $MTCO_2e$ per year, which is well below the threshold of 500 $MTCO_2e$ per year. Overall, the project would generate a nominal amount of GHG emissions and would not have the potential to conflict with CARB's 2022 Scoping Plan, the City's CAP, or any other applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As a storm water drainage improvement project, the project does not propose any habitable buildings and would not generate new vehicle trips during operation that would result in increased GHG emissions. As such, impacts would be less than significant.

[7] The project lifetime is based on the standard 30-year assumption of the SCAQMD (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas [GHG] Significance Threshold*, October 2008). Since the SDAPCD does not provide similar guidance, the project lifetime was assumed to be 30 years.

3.9 Hazards and Hazardous Materials

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

Discussion

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the proposed project would result in increased transport, use, storage, and disposal of hazardous materials, which could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction equipment and/or materials (i.e., oil, diesel fuel, transmission fluids, and solvents). These activities would be short-term in nature, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. The construction contractor would be required to implement standard construction BMPs related to the transport, use, storage, and disposal of hazardous materials in conformance with applicable federal, state, and local regulations pertaining to the use, handling, and disposal of hazardous substances. Accordingly, typical use of construction-related hazardous materials for the proposed improvements would not create a significant hazard to the public or the environment, and construction impacts would be less than significant.

Due to the nature of the proposed storm water drainage infrastructure system, the use of hazardous materials during project operation is not anticipated. Project operation would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and no significant operational impact would occur.

b) Would the project 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 in Response 3.9(a), construction of the proposed improvements would require limited use of hazardous materials that are typical for construction-related activities (i.e., oils, fuels, hydraulic fluids, and solvents). Although the potential for accidental releases (e.g., spilling of hydraulic fluids or diesel fuel from on-site construction equipment maintenance) does exist, it is anticipated any such incidents would be limited to small volumes and/or low concentrations. The construction contractor would be required to implement standard construction BMPs to avoid accidental spills and properly minimize the release in such an event in conformance with applicable federal, state, and local regulations regarding the use and handling of hazardous substances. As such, the project would not 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, and construction impacts would be less than significant.

During operation, the proposed storm water drainage infrastructure improvements are not anticipated to involve the use of hazardous materials. As such, the release of hazardous materials into the environment is unlikely to occur during project operation, and no operational impact would occur.

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

Less Than Significant Impact. The following schools are within 0.25 miles of the project site:

- Orange Glen High School, located at 2200 Glenridge Road (adjacent to the southern extent of the project site)
- Glen View Elementary School, located at 2201 East Mission Avenue (adjacent to the proposed improvements on East Mission Avenue)
- Palomar College (Escondido Campus), located at 1951 East Valley Parkway (adjacent to the proposed improvements along North Midway Drive)
- Children's Choice Academy, located at 2355 East Valley Parkway (adjacent to the proposed improvements along North Citrus Avenue)
- Learning Jungle – Escondido East, located at 1851 East Washington Avenue (located adjacent to the proposed improvements along East Washington Avenue)
- Oak Hill Elementary School, located at 1820 Oak Hill Drive (approximately 190 feet from the project site along South Midway Drive)
- Heritage Elementary School, located at 1855 East Valley Parkway (approximately 0.1 miles southwest of the proposed improvements along North Midway Drive)
- Heritage Flex Academy, located at 2269 East Valley Parkway (approximately 0.1 miles southwest of the proposed improvements along North Citrus Avenue)
- Escondido Charter High School, located at 1868 East Valley Parkway, approximately 0.1 miles west of the proposed improvements along North Midway Drive)

However, as discussed in Responses 3.9(a) and 3.9(b) above, project construction would be in conformance with applicable federal, state, and local regulations regarding the transport, use, storage, and disposal of hazardous materials, substances, and waste. Given the limited quantities and the types of hazardous materials associated with the project (i.e., oil, diesel fuel, transmission fluids, and solvents) and implementation of the standard construction BMPs and applicable regulations, the handling of hazardous materials within 0.25 miles of an existing or proposed school during project construction would not cause adverse health risk effects to students or staff at surrounding schools. Potential construction-related impacts would be less than significant.

As discussed in Responses 3.9(a) and 3.9(b) above, project operation would not require the use of hazardous materials, and therefore, would not emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within 0.25 miles of a school. No operational impacts would occur.

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

Less Than Significant Impact. The project site is an approximately five-mile-long corridor within public rights-of-way along existing roadways and Escondido Creek. The project site is not

included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on the State Water Resources Control Board's GeoTracker database and the California Department of Toxic Substances Control's EnviroStor database, 15 hazardous material cleanup sites have been identified within one block of the project site. All but two of the 15 cleanup sites have been adequately remediated and the cases have been closed; therefore, such sites are considered to no longer pose a potential risk of hazard to the public or the environment. The two remaining cases currently open on GeoTracker are:

- **Suzy Cleaners (1654 East Valley Parkway).** On February 7, 2020, a case was opened for this property due to potential aquifer, indoor air, and soil contamination from release of chemicals associated with a dry cleaning operation, including perchloroethylene (PCE). The Site Investigation Work Plan for the property is under development.
- **Former Ha's and Economy Cleaners (1718 East Valley Parkway).** On August 17, 2021, a case was opened for this property due to potential aquifer, indoor air, and soil contamination from release of chemicals associated with a dry cleaning operation, including PCE and trichloroethylene (TCE). The case is currently under legal review to determine the party legally responsible for costs related to site cleanup.

Although these two cases are currently open, the sites are located at least 100 feet from the proposed construction footprint at their closest point, and Escondido Creek is located in between the two cleanup sites and the closest extent of the project construction footprint. Therefore, it is unlikely that ground-disturbing activities associated with the proposed project would encounter contamination from the two open case sites. Further, the project would result in underground storm water drainage infrastructure improvements; no habitable structures or groundwater-dependent uses are proposed that would have the potential to expose people to a significant hazard to the public or the environment. Project impacts would be less than significant.

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

No Impact. The nearest public airport to the project site is the Ramona Airport located approximately 10 miles to the southeast. Based on the *Airport Land Use Compatibility Plan for Ramona Airport*, adopted April 7, 2022, the project site is not located within a safety zone or noise exposure zone (San Diego County Airport Land Use Commission 2022). Additionally, the project site is not located within the vicinity of a private airstrip or related facilities. The proposed improvements do not include any habitable structures and would be undergrounded within existing public rights-of-way. Therefore, project implementation would not expose people residing or working in the project area to excessive noise levels or safety hazards associated with aircraft operations. No impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact with Mitigation Incorporated. The County of San Diego, the incorporated cities in the county (including Escondido), and other public agencies within the county recently updated the countywide Multi-Jurisdictional Hazard Mitigation Plan, which

identifies potential risks and ways to minimize damage caused by natural and human-caused disasters. The County of San Diego Board of Supervisors adopted the revised 2023 Multi-Jurisdictional Hazard Mitigation Base Plan on February 7, 2023 (County of San Diego 2023a). The revised comprehensive plan includes the Multi-Jurisdictional Hazard Mitigation Plan: City of Escondido Annex, which states the City's Public Works Department and Police Department are responsible for identifying evacuation routes and procedures (County of Escondido 2023b). As identified in Figure 4.8-4, *Emergency Evacuation Routes*, from the City of Escondido General Plan EIR, the closest major evacuation route to the project site is Interstate 15, located approximately 2.6 miles west of the project site (City of Escondido 2024b). Therefore, the proposed project would not directly affect any designated evacuation routes.

Project construction occurring within public roadways may have the potential to result in temporary effects on vehicular circulation in the affected area. Lane closures and/or road detours could impair emergency vehicle response times and/or access, and/or interfere with emergency evacuations in the city. As discussed in Responses 3.15(a)(i) and 3.15(a)(ii), below, during project construction, the ability of the City's Fire Department and Police Department to maintain acceptable response times could be impacted due to temporary road segment and/or lane closures. Similarly, the construction phase could temporarily affect local evacuation routes. As such conditions could potentially represent a significant impact, mitigation measure TR-1 provided in Response 3.17(c) is proposed to require preparation and implementation of a Traffic Control Plan during project construction to reduce project effects on emergency response and emergency evacuation to a less than significant level.

The proposed project would not result in permanent alterations to existing area vehicular circulation routes, as the proposed improvements would be located underground. Additionally, once operational, the proposed project would improve road connectivity by decreasing flooding and related road closures in the project area. As such, project operation would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur in this regard.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The project site is located in an area surrounded by a built urban environment and is not located in a Very High Fire Hazard Severity Zone (CalFire 2024). However, a Very High Fire Hazard Severity Zone exists in the hillsides surrounding the city, approximately 0.4 miles southeast of the project area at its closest point. Nonetheless, as a storm water drainage infrastructure project, the project would not introduce land uses or other conditions that would increase risk of wildfire. Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impact would occur in this regard.

3.10 Hydrology and Water Quality

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

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the US EPA has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCBs) to preserve, protect, enhance, and restore water quality. The project site is located within the jurisdiction of the San Diego RWQCB.

The proposed project may result in temporary water quality impacts during short-term construction activities. The excavation required for project construction would result in exposed soils that may be subject to wind and water erosion. Potential pollutants associated with these activities could damage downstream waterbodies. The project site is approximately 57.5 acres. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the SWRCB's NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order WQ 2022-0057-DWQ (Construction General Permit). The Construction General Permit requires the project applicant (i.e., the City) to prepare and implement a SWPPP. The SWPPP would specify BMPs to be used during project construction. Implementation of the BMPs would ensure runoff and discharges during the project construction phase would not violate any water quality standards. Upon completion of the project, the project applicant is required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed. Therefore, compliance with the Construction General Permit and project-specific SWPPP would reduce potential short-term construction-related impacts to water quality to less than significant levels.

After construction, the project site would be resurfaced similar to existing conditions. The proposed storm water drainage improvements would provide filtration and treatment of runoff before discharging into Escondido Creek pursuant to state and regional water quality requirements. Therefore, project operation would not result in the violation of water quality standards or waste discharge requirements and would not otherwise substantially degrade surface or ground water quality. Impacts would be less than significant in this regard.

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

Less Than Significant Impact. The project site is currently developed with paved roads and sidewalks and is not used for groundwater extraction or groundwater recharge purposes. As an infrastructure project, the project does not propose habitable structures or other land uses that may be dependent upon groundwater supplies. Project construction would include resurfacing the project site following culvert and pipeline installation. Therefore, the project would not result in an increase in impervious surface area as compared to existing conditions. Additionally, the proposed storm water drainage improvements would provide filtration and treatment of runoff before discharging into Escondido Creek pursuant to state and regional water quality

requirements; however, this would not affect area groundwater supplies, as the filtrated and treated storm water would be discharged into the surface waters of a concrete-lined portion of Escondido Creek. Accordingly, the project would not impede sustainable groundwater management of the underlying groundwater basin, and impacts would be less than significant.

c-i) Would the project 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 result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The purpose of the proposed project is to eliminate flooding in the project area by improving the storm water drainage systems, which would result in a beneficial modification to the existing drainage systems in the city. Pursuant to City Municipal Code Chapter 22, Article 2, Section 22-26, *Reduction of Pollutants in Stormwater*, the project would be required to prepare a SWPPP to identify BMPs for implementation during project construction to prevent erosion, minimize siltation, and protect water quality. Adherence to the BMPs in the SWPPP would minimize soil erosion and siltation from project-related construction activities.

As discussed in Response 3.10(b), the project would not result in an increase in impervious surfaces. The project also would not alter the course of a stream or river. The proposed storm water drainage system improvements would result in the discharging of collected storm water in the project area into Escondido Creek, which is a concrete-lined channel in the project area. Therefore, the increased volume of storm water discharge into Escondido Creek as a result of project operation would not alter the course of the creek and would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

c-ii) Would the project 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 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 Response 3.10(c)(i). The project would not substantially alter the existing drainage pattern of the site and would not increase the area of impervious surfaces within the project boundaries. Rather, the proposed project is intended to eliminate flooding that occurs several times per year in the project area by improving the storm water drainage systems, thereby resulting in a beneficial modification to the existing drainage systems in the city; the project does not propose improvements that would result in flooding on- or off-site. The proposed drainage improvements have been designed to ensure that Escondido Creek would not overflow due to the increased volume of discharge into the creek as a result of project operation. Impacts would be less than significant.

c-iii) Would the project 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 create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Refer to Responses 3.10(a), 3.10(c)(i), and 3.10(c)(ii).

c-iv) Would the project 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 impede or redirect flood flows?

Less Than Significant Impact. Refer to Response 3.10(c)(ii).

d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. Refer to Responses 3.10(a), 3.10(c)(i), and 3.10(c)(ii) with regard to the potential release of pollutants from the project, which is located in a flood hazard zone. The project would be required to prepare a SWPPP for City approval, and BMPs would be implemented during project construction to protect water quality. Additionally, the proposed improvements would not increase impervious area within the project boundaries, thereby minimizing the potential for additional runoff that may contain pollutants. Potential impacts related to the release of pollutants during project construction or operation would be less than significant.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a substantial undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. According to the City of Escondido General Plan EIR, the City and project site are located more than one mile inland from the Pacific Ocean, and thus, are at a sufficient distance so as not to be subject to tsunami impacts (City of Escondido 2012b). No impact would occur in this regard.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. According to the City of Escondido General Plan EIR, seiches are possible at Lake Dixon and Lake Wohlford. The nearest body of water, Lake Dixon, is located approximately 0.7 miles to the northeast of the project site. Both Lake Dixon and Lake Wohlford are reservoirs built by local municipalities and water districts to provide water to local residents and businesses. Typically, all land around a reservoir's shoreline is in public holdings, which restrict private land development and minimize risk of inundation from seiches (City of Escondido 2012b). Therefore, a seiche would not result in the release of pollutants from the project, as the project site would likely not be inundated from seiches, and no impact would occur in this regard.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Water Quality Control Plan for the San Diego Basin (Basin Plan) establishes water quality standards for ground and surface waters within the San Diego Region, which includes the city, and is the basis for the San Diego RWQCB's regulatory programs (San Diego RWQCB 2021). The nearest impaired water body to the project site under the jurisdiction of the Basin Plan is Escondido Creek, which traverses the project site. Escondido Creek then flows in a southwesterly direction towards Elijo Lagoon approximately 12 miles to the southwest. Pollutants and stressors for Escondido Creek include benthic community effects, bifenthrin, dichlorodiphenyltrichloroethane (DDT), indicator bacteria, manganese, nitrogen, selenium, sulfates, total dissolved solids, toxicity, cyfluthrin, cypermethrin, iron, phosphorus, pyrethroids, turbidity, and phosphate. Pollutants and stressors for Elijo Lagoon include indicator

bacteria, dissolved oxygen, phosphorus, turbidity, eutrophic conditions, sedimentation/siltation, and toxicity.

As discussed in Response 3.10(a), the proposed project may result in water quality impacts during short-term construction activities. However, compliance with the Construction General Permit and project-specific SWPPP would reduce potential short-term construction-related impacts to water quality to less than significant levels. The SWPPP would specify BMPs to be used during project construction. Implementation of the BMPs would ensure runoff and discharges during project construction would not violate any water quality standards. The proposed storm water drainage improvements would provide filtration and treatment of runoff before discharging into Escondido Creek pursuant to state and regional water quality requirements. Therefore, the proposed project would not conflict with or obstruct implementation of the Basin Plan, and impacts would be less than significant.

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans or prepare an alternative to a groundwater sustainability plan. The city is not located within a high- or medium-priority groundwater basin. Therefore, no sustainable groundwater management plan applies to Escondido. Further, as indicated in Response 3.10(b), the proposed project would not substantially deplete groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant in this regard.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING: *Would the project:*				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) Would the project physically divide an established community?

Less Than Significant Impact. Construction of the proposed storm water drainage infrastructure improvements would occur within public rights-of-way, primarily within the travel lanes of existing roadways, in an urbanized portion of the city. Due to the nature of the proposed improvements (i.e., below ground surface), it is not anticipated that construction would result in the physical division of an established community. Temporary lane and/or road closures would occur during project construction; however, given the linear nature of the project, the active construction area would continuously move along the project site at a rate of approximately 50 to 80 linear feet per day. As such, project construction impacts related to physically dividing an established community would be less than significant.

The area affected by the proposed improvements is highly urbanized and is generally surrounded by multi- and single-family residential, commercial, and institutional uses. The project would not include substantial new infrastructure that would induce population growth or alter existing land uses in the city, such as major roadways or water supply systems. Accordingly, the proposed improvements would not remove barriers to growth, generate extraordinary economic growth, generate an indirect inducement to significant growth, be a precedent-setting action, or encroach into open space. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties.

Because the proposed storm water drainage infrastructure improvements would be below ground, no physical elements of the project would result in the division of an established community. Furthermore, the proposed project would enhance connectivity in the city by eliminating reoccurring floods and subsequent road closures as a result of the current storm water drainage infrastructure capacity. Therefore, project operation would not physically divide an established community, and no operational impact would occur.

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

No Impact. The project site is located within public rights-of-way associated with existing roadway corridors and the concrete-lined Escondido Creek. Roadway corridors in the city do not have a General Plan or zoning designation. Escondido Creek has a General Plan designation of "Flood" and is zoned as "Flood Control Channel" (FCC). The proposed project would not alter the existing uses of the project site. As such, the project would be consistent with applicable land use plans, policies, and regulations, including those outlined in the City of Escondido General Plan and Municipal Code. Accordingly, no impact would occur.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES: *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

a) Would the project 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 City of Escondido General Plan does not identify the presence of mineral resource deposits or active extraction operations in Escondido (City of Escondido 2012a). Additionally, the project corridor is built out with roadways and sidewalks and is not available for mineral resource recovery. Therefore, the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur.

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

No Impact. Refer to Response 3.12(a), above.

3.13 Noise

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

Discussion

The information presented in this analysis is based on the *East Valley Parkway and Midway Drive Drainage Improvements Project – Noise and Vibration Assessment*, prepared for the proposed project by Michael Baker International, dated October 25, 2024; refer to Appendix E, *Noise and Vibration Assessment*. The project-specific technical memorandum is based on a preliminary version of the proposed project, which included smaller construction trench widths and smaller widths/diameters of culverts/pipelines, meaning that the actual amount of surface disturbance (including pavement removal) and soil cut/fill would be approximately doubled from that assumed in the project-specific technical memorandum. However, even with the doubling of surface and soil disturbance during construction, construction would only occur during the days and hours allowed by the City's Municipal Code, and thus would not exceed applicable noise requirements.

Fundamentals of Sound and Environmental Noise

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In terms of human response to noise, a sound

10 dBA higher than another is perceived to be twice as loud, and 20 dBA higher is perceived to be four times as loud, and so forth. Everyday sounds normally range from 30 dBA (very quiet) to 100 dBA (very loud). On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by several sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

The metrics used to characterize community noise exposure fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. Noise levels described by L_{dn} and CNEL are similar and usually do not differ by more than 1 dBA. Additionally, the L_{max}, or maximum sound level, describes the highest sound level at a single event in which the sound level changes value as time goes on. Although L_{max} is important in evaluating an interference caused by a single noise event, L_{max} could not be totaled into a one-hour or a 24-hour cumulative measure of impact.

Fundamentals of Environmental Groundborne Vibration

Sources of earth-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 6, *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels*, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

Ground vibration can be a concern in instances where buildings shake and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for groundborne vibration are planes, trains, and construction activities such as pile driving and vibratory compacting activities which require the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

Table 6. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006–0.019	64–74	Range of threshold of perception.	Vibrations unlikely to cause damage of any type.
0.08	87	Vibrations readily perceptible.	Recommended upper level to which ruins and ancient monuments should be subjected.
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities.	Virtually no risk of architectural damage to normal buildings.
0.2	94	Vibrations may begin to annoy people in buildings.	Threshold at which there is a risk of architectural damage to normal dwellings.
0.4–0.6	98–104	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.	Architectural damage and possibly minor structural damage.

Source: California Department of Transportation, *Transportation Related Earthborne Vibrations,* 2002.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and

other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The project site is currently surrounded by land uses including single- and multi-family residences, commercial uses, schools, religious institutions, a self-storage center, a fire station, and a public park. The nearest sensitive receptors are residential uses (multi-family residences and single-family residences), institutional uses (New Hope Community Church), and schools (Orange Glen High School, Glen View Elementary School, Palomar College [Escondido Campus], Children's Choice Academy, and Learning Jungle – Escondido East) located along the proposed project limits. Project construction activities would occur as close as five feet from the existing residential uses.

Escondido Construction Noise Ordinance

The City has established a quantitative threshold that applies to noise levels at active construction sites. Based on Escondido Municipal Code Sections 17-234 and 17-238, the maximum noise allowed during permitted construction hours at the nearest residential uses shall not exceed a one-hour average sound level limit of 75 dBA at any time. Escondido Municipal Code Sections 17-234 and 17-238 state:

Section 17-234, Construction Equipment

Except for emergency work, it shall be unlawful for any person, including the City of Escondido, to operate construction equipment as follows:

a. *It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of seven (7) a.m. and six (6) p.m. and on Saturdays between the hours of nine (9) a.m. and five (5) p.m., and provided that the operation of such construction equipment complies with the requirements of subsection (d) of this section.*

b. *It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the president, governor or city council as public holidays.*

…

d. *No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of seventy-five (75) dB at any time, unless a variance has been obtained in advance from the city manager.*

e. *Persons engaged in construction for profit or as a business shall post signs at conspicuous places on a construction site, indicating hours of work as prescribed by this article or authorized by permit and the applicable noise level limits.*

Section 17-238, Grading

a. *It shall be unlawful for any person, including the City of Escondido, to do any authorized grading at any construction site, except on Mondays through Fridays during a week*

between the hours of seven (7) a.m. and six (6) p.m. and, provided a variance has been obtained in advance from the city manager, on Saturdays from ten (10) a.m. to five (5) p.m.

b. For the purpose of this section, "grading" shall include but not be limited to compacting, drilling, rock crushing or splitting, bulldozing, clearing, dredging, digging, filling and blasting.

c. In addition, any equipment used for grading shall not be operated so as to cause noise in excess of a one hour sound level limit of seventy-five (75) dB at any time when measured at or within the property lines of any property which is developed and used in whole or in part for residential purposes, unless a variance has been obtained in advance from the city manager.

a) Would the project result in 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.

Construction

Construction noise typically occurs intermittently, and the created noise levels vary depending on the nature or phase of construction (e.g., grading, grubbing, and excavation). The proposed project would be constructed over a duration of approximately 24 months, and all stages of construction activities would occur simultaneously.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and the number of each type of equipment used. Construction equipment produces maximum noise levels when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, or part power. Construction noise levels are typically associated with multiple pieces of equipment simultaneously operating on part power. The City has established a quantitative threshold that applies to noise levels at active construction sites. Based on the City's Municipal Code Sections 17-234 and 17-238, the maximum noise level allowed during permitted construction hours at the nearest residential uses shall not exceed a one-hour average sound level limit of 75 A-weighted decibels (dBA) at any time.

Project noise levels from construction equipment and activities were modeled using the Federal Highway Administration's Roadway Construction Noise Model. Although project construction activities would occur simultaneously, and the total length of the project alignment totals approximately 3.5 miles, the active construction area would progress at a rate of approximately 50 to 80 linear feet per day. As such, construction noise levels would intermittently occur for a day when construction equipment is operating closest to the nearest sensitive uses. Due to the site constraints (narrow construction area) and project phasing, construction activities would not occur simultaneously at one locale. Therefore, the noise level of each piece of construction equipment

is quantified individually. As the construction equipment linearly progresses, construction noise levels at a given locale would decrease as the equipment operates farther from the sensitive uses.

Table 7, *Construction Noise Levels at Adjacent Residential Receptors*, presents the estimated construction noise levels at the nearest noise-sensitive receptors. Sensitive land uses surrounding the project area include single- and multi-family residences, schools, and religious institutions. Project construction activities would occur as close as five feet from the existing residential uses. Table 7 also shows construction noise levels at 50 and 80 feet (for informational purposes only).

Table 7. Construction Noise Levels at Adjacent Residential Receptors

Construction Equipment	Number of Equipment	Estimated Exterior Construction Noise Level at 5 feet (dBA L_{eq})[1]	Estimated Exterior Construction Noise Level at 15 feet (dBA L_{eq})[1]	Estimated Exterior Construction Noise Level at 50 feet (dBA L_{eq})[1]	Estimated Exterior Construction Noise Level at 80 feet (dBA L_{eq})[1]
Concrete/Industrial Saws	2	102.6	93.0	82.6	78.5
Excavators	3	96.7	87.2	76.7	72.6
Pavers	1	94.2	84.7	74.2	70.1
Compactors (Plate)	1	96.2	86.7	76.2	72.2
Pressure Washers	1	105.1	95.6	85.1	81.0
Pumps	2	97.9	88.4	77.9	73.8
Rollers	1	93.0	83.5	73.0	68.9
Rough Terrain Forklifts	1	91.0	81.5	71.0	66.9
Rubber Tired Loaders/Skid Teer Loaders	2	95.1	85.6	75.1	71.0
Surfacing Equipment	1	97.3	87.8	77.3	73.3
Tractors/Loaders/Backhoes	1	93.6	84.0	73.6	69.5
Welders	1	90.0	80.5	70.0	65.9

dBA = A-weighted decibels; L_{eq} = equivalent sound level
Notes:
1. The noise level of each construction equipment is quantified individually due to the nature of the construction activities. Refer to Appendix A, Noise Data, of Appendix D, *Noise and Vibration Assessment*, for modeled heavy construction equipment list.
Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006 (see Appendix A, Noise Data, of IS/MND Appendix D, *Noise and Vibration Assessment*).

As shown in Table 7, construction noise levels would be approximately 90.0 to 105.1 dBA equivalent sound level (L_{eq}) at five feet and approximately 80.5 to 95.6 dBA L_{eq} at 15 feet. As previously stated, construction activities would progress linearly, and equipment would move at a rate of 50 to 80 feet per day. Construction noise would range from approximately 70.0 to 85.1 dBA L_{eq} at 50 feet and approximately 65.9 to 81.0 dBA L_{eq} at 80 feet and would have the potential to exceed the City's one-hour average sound level limit of 75 dBA. However, noise levels from point sources such as equipment at construction sites typically attenuate at a rate of 6 dBA per doubling of distance. As the construction equipment moves linearly along the project alignment, none of the construction equipment would operate continuously for eight hours or more near a sensitive

receptor. Additionally, the project would implement several BMPs during construction to reduce noise levels at the sensitive receptors, such as the use of construction equipment with properly operating and maintained mufflers and locating stationary construction equipment so that emitted noise is directed away from the nearest sensitive receptors. Project construction hours would also be consistent with the City's Municipal Code (grading activities would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday, and construction activities would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday; grading and construction activities would not be allowed on Sundays or holidays). Noise mufflers could provide noise reduction of approximately 10 dBA, and natural noise reduction from intervening topography, structures, and landscaping would also occur. Nonetheless, construction-related noise could potentially exceed the City's one-hour sound level limit of 75 dBA, and project construction would require a variance from the City Manager, pursuant to Escondido Municipal Code Section 17-234(d). Therefore, project construction noise levels would not exceed standards established in the City's noise ordinance, and construction noise impacts would be less than significant.

Operational

Mobile Noise

Operation of the proposed storm water drainage improvements would not generate new vehicular trips and would not increase the roadway capacity along any of the subject roadways. Therefore, project operation would not result in increased mobile source noise. No impact would occur in this regard.

Stationary Noise

The project would not introduce new land uses, and operation of the proposed project would not introduce any new stationary noise-generating sources (i.e., pumps). No impact would occur in this regard.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s).

The project would use vibratory rollers during construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The California Department of Transportation's *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the California Department of Transportation architectural damage criterion for continuous vibrations at residential buildings of 0.5 in/sec PPV. Table 8, ***Typical Vibration Levels for Construction Equipment***, summarizes the groundborne vibration levels associated with representative construction equipment.

Table 8. Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (in/sec)	Approximate peak particle velocity at 15 feet (in/sec)[1]
Vibratory roller	0.210	0.368
Large bulldozer	0.089	0.156
Loaded trucks	0.076	0.133
Small bulldozer	0.003	0.005

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$
where: PPV (equip) = the peak particle velocity in inch-per-second of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in inch-per-second from Table 7-4 of the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual*
D = the distance from the equipment to the receiver
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Construction activities would occur linearly along the subject roadways, and due to the site constraints (narrow construction area), large construction equipment, including large bulldozers, would operate as close as 15 feet from the nearest sensitive receptor buildings. As indicated in Table 8, vibration velocities range between 0.005 and 0.368 in/sec at 15 feet, which would not cause vibration levels to exceed the 0.5 in/sec threshold at the closest sensitive receptor structures. Further, construction activities would progress linearly along the subject roadways, and active construction areas would move at a rate of approximately 50 to 80 feet per day. As such, vibration levels resulting from the proposed project would be temporary and intermittent in nature. Therefore, impacts from construction vibration would be less than significant.

Operational

Operation of the proposed project would not generate groundborne vibration that would be felt by surrounding uses. Project operation would not involve railroads or substantial heavy truck operations that would result in vibration effects. No impact would occur.

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 proposed project is not located within an airport land use plan, and there are no public or private airports or airstrips within two miles of the project site. The nearest public use airport to the project site is the Ramona Airport which is approximately 10 miles southeast of the project site. Furthermore, the proposed project would not include a land use that would expose people residing or working in the project area to excessive airport-related noise levels. Therefore, no impact would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING: *Would the project:*				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) Would the project 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 proposed project involves improvements to the City's existing storm water drainage infrastructure system. The project would not include a residential or commercial component and would not directly or indirectly induce substantial area population growth. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. No impact would occur.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed improvements would occur within existing public rights-of-way currently developed with roadways and sidewalks. Therefore, the project would not result in the displacement of any existing people or housing, and no construction of replacement housing would be required. No impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES:				
a) 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:				
i) Fire protection?	☐	☒	☐	☐
ii) Police protection?	☐	☒	☐	☐
i) Schools?	☐	☐	☐	☒
i) Parks?	☐	☐	☐	☒
i) Other public facilities?	☐	☐	☐	☒

Discussion

a-i) 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 fire protection?

Less Than Significant Impact with Mitigation Incorporated. The Escondido Fire Department provides 24-hour fire, rescue, and emergency medical services throughout the city, including the project site. The Escondido Fire Department also includes a Fire Prevention Division, Fire Operations Division, Fire Administrative Division, and Fire Support Services Division.[8] Seven fire stations serve the City. The closest fire station to the project site is Escondido Fire Department Station 2 at 421 North Midway Drive, which is immediately adjacent to the project alignment in the central portion of the project area. Station 2 is currently staffed with one captain, one engineer, two firefighter paramedics, and one paramedic/emergency medical technician, and includes one Type 1 Fire Engine, one rescue ambulance, and one Type 6 Brush Patrol Engine.[9] Station 7,

[8] City of Escondido Fire Department, *Escondido Fire Department Organization Chart*, https://fire.escondido.org/Data/Sites/3/media/Welcome-Organization/DutyOrgChart8.14.23.pdf, accessed October 3, 2024.

[9] City of Escondido Fire Department, *Facilities*, https://fire.escondido.org/Facilities/Facility/Details/Fire-Station-2-25, accessed October 3, 2024.

located at 1220 North Ash Street, approximately one mile to the northeast of the project site at its closest point, also serves the project area. Station 7 is currently staffed with one captain, one engineer, one firefighter paramedics, and two paramedics, and includes one Type 1 Fire Engine and one rescue ambulance.[10]

The project would not involve development of any residential units or other land uses that would have the potential to generate new population or increase demand for new or expanded fire protection services. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. Due to the nature of the proposed improvements, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.

During construction, the project could potentially affect the ability of the Escondido Fire Department to maintain acceptable response times due to temporary road segment and/or lane closures, which could result in a potentially significant impact to fire protection services. However, with implementation of mitigation measure TR-1 in Response 3.17(c), which includes preparation and implementation of a Traffic Control Plan during project construction, potential impacts to fire protection response times would be reduced to less than significant levels.

a-ii) 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 police protection?

Less Than Significant Impact with Mitigation Incorporated. The Escondido Police Department provides law enforcement services to the city, including the project area. The Police Department headquarters is located at 1163 Centre City Parkway, approximately 1.9 miles west of the project site at its nearest point.[11]

Project construction activities would be short term, and the need for law enforcement services after project construction is not anticipated due to the nature of the proposed improvements. As appropriate, construction staging areas would be routinely secured during the construction phase to minimize the potential for theft or vandalism to occur. Once the storm water drainage infrastructure is operational, all such improvements would be underground and would therefore not be anticipated to pose a risk for vandalism or other security risk. The proposed project would not include new residential units or other land uses that would require new or expanded law enforcement services. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities or the need for

[10] City of Escondido Fire Department, *Facilities*, https://fire.escondido.org/Facilities/Facility/Details/Fire-Station-7-31, accessed October 3, 2024.

[11] City of Escondido Police Department, https://www.escondido.gov/172/Police; accessed October 3, 2024.

new or physically altered police facilities, the construction of which could cause significant environmental impacts.

During construction, the project could potentially affect the ability of the Escondido Police Department to maintain acceptable response times due to temporary road segment and/or lane closures, which could result in a potentially significant impact to police services. However, with implementation of mitigation measure TR-1 in Response 3.17(c), which includes preparation and implementation of a Traffic Control Plan during project construction, potential impacts to police response times would be reduced to less than significant levels.

a-iii) 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 schools?

No Impact. A number of existing schools are adjacent to or in the vicinity of the project site, including:

- Orange Glen High School, located at 2200 Glenridge Road (adjacent to the southern extent of the project site)
- Glen View Elementary School, located at 2201 East Mission Avenue (adjacent to proposed improvements on East Mission Avenue)
- Palomar College (Escondido Campus), located at 1951 East Valley Parkway (adjacent to the proposed improvements along North Midway Drive)
- Children's Choice Academy, located at 2355 East Valley Parkway (adjacent to the proposed improvements along North Citrus Avenue)
- Learning Jungle – Escondido East, located at 1851 East Washington Avenue (located adjacent to the proposed improvements along East Washington Avenue)
- Oak Hill Elementary School, located at 1820 Oak Hill Drive (approximately 190 feet from the project site along South Midway Drive)
- Heritage Elementary School, located at 1855 East Valley Parkway (approximately 0.1 miles southwest of the proposed improvements along North Midway Drive)
- Heritage Flex Academy, located at 2269 East Valley Parkway (approximately 0.1 miles southwest of the proposed improvements along North Citrus Avenue)
- Escondido Charter High School, located at 1868 East Valley Parkway, approximately 0.1 miles west of the proposed improvements along North Midway Drive)

Although these schools are located within proximity to the project site, the proposed storm water drainage improvements would not induce population growth, introduce new land uses that would generate student-aged population, or increase the overall demand on local schools. As a result, the project would not result in the provision or need for new or physically altered governmental facilities relative to schools that may have the potential to result in significant environmental impacts to maintain adopted service ratios or other performance objectives. With regard to

driveway access to schools adjacent to the project site, refer to Response 3.17(c) in Section 3.17, Transportation. No impact would occur to school facilities or to school service ratios or other performance objectives that would necessitate new or physically altered schools.

a-iv) 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 parks?

No Impact. The City currently owns, operates, and maintains 15 parks and associated facilities within the city boundaries.[12] Washington Park, located at 501 North Rose Street in the southwestern portion of the project area, is the only City park that lies within proximity to the project site.

As discussed in Response 3.15(a)(iii), as a storm water drainage infrastructure project, the proposed project would not induce area population growth or introduce new land uses that would generate population or increase demand on local or regional recreational resources, including parks. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. As a result, the project would not result in the provision or need for new or physically altered parks that may have the potential to result in significant environmental impacts to maintain adopted service ratios or other performance objectives. No impact to park facilities would occur.

a)v) 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 other public facilities?

No Impact. Other public facilities include libraries, hospitals, and other public-serving uses. The nearest public library to the project site is the Escondido Public Library, located approximately 1.4 miles to the southwest at 239 South Kalmia Street. The nearest hospital, General Healthcare Partners, is located approximately 1.1 miles to the southwest of the project site at 215 South Hickory Street.

As previously stated, due to the nature of the proposed improvements, the project would not generate new population or result in land uses that would increase demand on existing governmental facilities or services. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. Construction and operation of the proposed project would not result in the provision or need for new or physically altered public facilities that may have the potential to result in significant environmental impacts to maintain adopted service ratios or other performance objectives. No impact would occur.

[12] City of Escondido, Park Facilities, https://www.escondido.gov/439/Park-Facilities, accessed October 2, 2024.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

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

No Impact. The proposed project involves improvements to the City's existing storm water drainage infrastructure system. The project would not include a residential component that would increase the number of residents in the city. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. As such, the project would not cause an increase in the use of existing neighborhood parks, regional parks, or other recreational facilities. No impact would occur.

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

No Impact. As discussed in Response 3.16(a), the project would not include a residential component that would increase the number of residents in the city. Rather, the proposed project would accommodate existing development by increasing the capacity of the storm water drainage systems in the central portion of the city to address reoccurring flooding on more than 1,600 properties. As such, the project would not include or require the construction or expansion of recreational facilities. No impact would occur.

3.17 Transportation

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

Discussion

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

Less Than Significant Impact. The Escondido General Plan Mobility and Infrastructure Element includes transportation goals, policies, and implementation programs that govern the system of roadways, intersections, bicycle paths, pedestrian ways, and other components throughout the circulation system, which collectively provide for the movement of people and goods throughout the city. The following Escondido General Plan Mobility and Infrastructure Element policy applies to the proposed project:

- Complete Streets Policy 2.4: Evaluate access, safety, and convenience of various transportation modes for every project involving the following eight user groups: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.

Because the project area supports a variety of public circulation means, including roadways, sidewalks, bike lanes, and bus routes and stops, circulation facilities may be affected during construction of the proposed infrastructure improvements. The project may therefore have the potential to conflict with a program, plan, ordinance, or policy addressing the circulation system. However, measures would be taken to ensure that pedestrian access, bicycle access, and access to area public transit would be maintained, as applicable, throughout the construction phase. Although a significant impact would not occur in this regard, implementation of mitigation measure TR-1 (see Thresholds 3.17(c) and 3.17(d), below) would require preparation and implementation of a Traffic Control Plan, reducing the potential for conflicts relative to the transportation system

to occur. Additionally, as the proposed improvements would be undergrounded, project operation would not impact the movement of goods or services in the surrounding area. Thus, the project would be consistent with Complete Streets Policy 2.4.

As a storm water drainage improvement project, the proposed improvements would not involve features that would permanently decrease access, safety, or convenience for pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services. In fact, the proposed storm water drainage improvements would improve drainage in the project area, which currently floods several times a year, causing road closures and hindering access, safety, and convenience for motor vehicles, pedestrians, bicyclists, and transit users during flooding events. Therefore, operation of the project would not conflict with area transportation modes.

As such, the proposed project would not conflict with General Plan policies or implementation programs related to the circulation system. Impacts would be less than significant in this regard.

Bicycle Master Plan

The City's Bicycle Master Plan represents an implementation tool of the City of Escondido General Plan. The General Plan was most recently updated in 2012 and includes numerous goals and objectives that encourage the use of bicycles. However, the Bicycle Master Plan does not directly introduce any new goals beyond those identified in the General Plan.

Bicycle Facilities

Based on Figure ES-1, ***Existing & Planned Bikeways***, of the Bicycle Master Plan, the majority of the proposed storm water drainage improvements would be located on streets with existing or proposed Class II or Class III bike lanes. An existing Class I Multi-use bike lane also runs along the extent of Escondido Creek within the project area (City of Escondido 2012c). Any bike lanes temporarily affected by the project during active construction would be rerouted as needed, along with vehicular traffic flows, to minimize potential conflicts and maintain bicyclist safety. Following completion of the proposed improvements, no disruption to bike travel in the affected area would occur. As such, construction or operation of the proposed improvements would not impede implementation of the Bicycle Master Plan.

The project would not conflict with a plan, ordinance, or policy addressing bicycle facilities, and impacts would be less than significant.

Transit Facilities

Bus services. The North County Transit District (NCTD) provides bus services in the city via 30 BREEZE routes (NCTD 2024). A number of existing bus routes serve the area affected by the proposed improvements, as shown in Table 9, ***Bus Routes within the Project Area***.

Table 9. Bus Routes within the Project Area

Route Number	Route Name	Affected Project Roadways
351-352	Escondido Circulator	Valley Parkway, East Grand Avenue, 2nd Avenue, East Washington Avenue
354	Orange Glen High School via Mission, Lincoln, & Citrus	East Lincoln Avenue, North Midway Drive, Glenridge Drive, Citrus Avenue
355/357	El Norte Parkway & Valley Parkway	El Norte Parkway, Valley Parkway
371 Flex	FLEX Ramona Commuter	Valley Parkway
388	Escondido to Pala	Valley Parkway
651/652	Escondido Transit Center to Orange Glen High School	Citrus Avenue, Glenridge Drive, East Grand Avenue, 2nd Avenue, Valley Parkway, East Washington Avenue
Source: NCTD 2024		

As construction of the proposed improvements is anticipated to proceed at an estimated 50 to 80 feet per day for open trench culvert/pipe installation, existing bus stop locations within the project area would generally be maintained during the construction phase. However, in instances where a bus stop may be affected by construction activities, temporary relocation of the bus stop along the same street may be required to ensure that public access to bus transit is provided. Such temporary disruptions are anticipated to be limited to 24-hour periods as construction within a particular area is completed. Further, due to the nature of the proposed improvements, the project is not anticipated to result in an increase in public use of local bus or transit facilities, compared to the existing condition, thereby reducing the potential for conflict to occur.

Additionally, based on City of Escondido General Plan Figure 3-4, *Existing & Proposed Transit Routes*, the NCTD is proposing an extension of the existing NCTD rapid bus line which would extend eastward from Centre City Parkway along Valley Parkway to its intersection with Bear Valley Parkway. Thus, this extension may be affected by the proposed storm water drainage improvements, depending on the timing of construction of the NCTD line and whether project-related improvements are underway in the vicinity along Valley Parkway at the time. As appropriate, coordination would occur to ensure that the project does not interfere with access to this bus line during construction.

Rail Services. The NCTD currently operates a commuter rail line (SPRINTER) that spans 22 miles and connects the cities of Oceanside, Vista, San Marcos, and Escondido through 15 stations that run along the State Route 78 corridor. The closest SPRINTER station to the project site is the Escondido Transit Center which is located approximately 2 miles southwest of the project site. Based on the City of Escondido General Plan Figure 3-4, *Existing & Proposed Transit Routes*, the NCTD is proposing an extension of the existing SPRINTER rail line from the Escondido Transit Center along Centre City Parkway. However, the proposed project would not result in any design features, roadway improvements, or pedestrian walkway improvements that would permanently interfere with future extension of the SPRINTER rail line in Centre City Parkway right-of-way due to distance. As such, implementation of the proposed project would not have the potential to interfere with or impact existing or future SPRINTER rail line services.

Additionally, temporary sidewalk closures on streets or at intersections along the affected alignments may be required while the proposed improvements are being installed; however, such

short-term closures are not anticipated to substantially disrupt pedestrian movement in the project area or decrease the performance or safety of such facilities. Further, improvements would be phased and constructed in segments, rather than at one time, thereby reducing the potential for substantial disruption to pedestrian circulation routes or access to public transportation along existing roadways or intersections that may be affected by the project.

As the proposed storm water drainage infrastructure improvements would be undergrounded, long-term operations would not affect surface circulation systems once construction is completed. At project completion, operation of the facilities would not conflict with any program plan, ordinance, or policy addressing the City's existing or future transit, bicycle, or pedestrian network. Further, any disturbance to affected roadways, transit, bicycle, or pedestrian facilities would be restored to pre-project conditions upon the completion of construction.

As such, the project would not conflict with a plan, ordinance, or policy regarding transit facilities, and impacts would be less than significant.

Overall, the proposed storm water drainage infrastructure improvements would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

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

No Impact. The City adopted thresholds of significance and screening criteria for vehicle miles traveled (VMT) evaluation on April 21, 2021. The thresholds of significance and screening criteria are provided in the *City of Escondido Transportation Impact Analysis Guidelines* (VMT Guidelines), dated April 21, 2021. The methodologies in the VMT Guidelines are consistent with OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), dated December 2018, and the Institute of Transportation Engineers' *San Diego Regional Guidelines*, dated May 2019.

The VMT Guidelines identify instances where a development project would be screened out of VMT analysis based on a presumption that its VMT effects would be less than significant. The proposed project was reviewed with the City's screening criteria to determine if a VMT analysis is necessary; as an infrastructure improvement project, such exceptions do not apply. Traffic generated by the proposed project would be limited to that during the construction phase. No land uses that would generate new vehicle trips in the affected area would result with the proposed storm water drainage infrastructure improvements. Once construction is completed, vehicle trips would be limited to periodic maintenance or repair on an as-needed basis. Therefore, a VMT analysis is not required and the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). No impact would occur.

c) Would the project 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 with Mitigation Incorporated. During construction, temporary lane closures may be required to allow for the proposed improvements within the affected right-of-way. Construction-related traffic may temporarily affect vehicular (including buses), bicycle, and

pedestrian movement along affected roadways, thereby potentially affecting public safety or restricting or delaying access to existing land uses. Mitigation measure TR-1 would be implemented to reduce potential safety hazards by requiring preparation of a Traffic Control Plan for roadways and intersections affected by the project, prior to the start of construction. Implementation of mitigation measure TR-1 would reduce potential temporary construction impacts to less than significant.

The proposed improvements would not include new permanent design features or incompatible uses that could adversely affect vehicular or other means of transportation on affected roadways. As the improvements would be installed underground, no physical design features or incompatible uses that could decrease public safety during project operations would result. Further, any disturbance to affected roadways, transit, bicycle, or pedestrian facilities would be restored to pre-project conditions upon the completion of construction. Due to the nature of the proposed infrastructure improvements, no operational impacts would occur.

TR-1: **Prepare and Implement a Traffic Control Plan.** The construction contractor shall prepare a Traffic Control Plan for roadways and intersections affected by the proposed improvements for approval by the City Engineer. The Traffic Control Plan shall include, but not be limited to, the following elements based on local site and roadway conditions:

- Provide street layout showing location of construction activity and surrounding streets to be used as detour routes, including “special signage.” Post a minimum 72-hour advance warning of construction activities within affected roadways to allow motorists to select alternative routes.
- Restrict delivery of construction materials to non-peak travel periods (9:00 a.m. to 3:00 p.m.) or as appropriate. Weekend and night work shifts shall be allowed in non-residential areas only.
- Maintain the maximum travel-lane capacity during non-construction periods, and provide flagger-control at construction sites to manage traffic control and flows.
- Limit the construction work zone in each block to a width that, at a minimum, maintains alternate one-way traffic flow past the construction zone.
- Maintain access for driveways and private roads, except for brief periods of construction, in which case property owners will be notified.
- Require temporary steel-plate trench crossings, as needed, to maintain reasonable access to homes, businesses, and streets. When required by the applicable encroachment permit, maintain the existing lane configuration during nonworking hours by covering the trench with steel plates or by using temporary backfill.
- Require appropriate warning signage and safety lighting for construction zones.
- Access for emergency vehicles shall be maintained at all times. Police, fire, and emergency services shall be notified of the timing, location, and duration of

construction activities that could hinder and/or delay emergency access through the construction period.

- Coordinate with the North County Transit District to plan, as needed, for the temporary relocation of bus stops and/or detour of transit routes on affected storm water drainage alignments.
- Identify detours, where available, for bicyclists and pedestrians in areas potentially affected by project construction.
- Provide adequate off-street parking locations for workers' vehicles and construction equipment in those areas where on-street parking availability is insufficient.
- Repair and restore the roadway right-of-way to its original condition or better upon completion of work.

d) Would the project result in inadequate emergency access?

Less than Significant Impact with Mitigation Incorporated. As discussed in Response 3.17(c) above, project construction would result in disturbance within the roadway right-of-way that may temporarily affect emergency access. Such activity may require lane closures and/or a reduction in the width of travel ways during the construction phase. As discussed in Response 3.17(c) above, although construction activities would temporarily impact adjacent roadway right-of-way (e.g., through partial lane closures), the proposed project would implement mitigation measure TR-1 which would require preparation and implementation of a Traffic Control Plan. Potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flag person to direct traffic during heavy equipment use, among others, may be identified to ensure that emergency access is maintained during short-term project construction activities. With implementation of mitigation measure TR-1, impacts would be reduced to less than significant.

The proposed storm water drainage infrastructure improvements would be located underground. No direct effects on emergency access would therefore result following completion of construction. No impact would occur in this regard.

3.18 Tribal Cultural Resources

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

Discussion

a-i) Would the project 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 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)?

No Impact. As detailed in Response 3.5(a), no historic resources listed or eligible for listing in a state or local register of historic resources are located on the project site. Therefore, no impact related to known historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

a-ii) Would the project 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 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 Resource 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. In compliance with AB 52, the City distributed letters via certified mail on October 28, 2024 to 31 Native American tribes notifying each tribe of the opportunity to consult with the City regarding the proposed project. The tribes were identified based on a list provided by the NAHC or were tribes that had previously requested to be notified of future projects proposed by the City. The tribes had 30 days to respond to the City's request for consultation pursuant to AB 52. The information provided below is a summary of the results of consultation between the City and the two tribes that requested consultation pursuant to AB 52. Of the 31 Native American tribes that received notices: 3 were returned as undeliverable, 23 received the letter, and the City did not receive responses from 5. The City received responses from the Tribes below, and engaged in consultation pursuant to AB 52.

The San Luis Rey Band of Mission Indians (San Luis Rey Band) responded on November 08, 2024, to request consultation. City staff and the San Luis Rey Band held a meeting on February 06, 2025. City staff described the project, and the San Luis Rey Band requested information regarding the timeframe for construction of project storm drain system. On March 18, 2025, the requested information was provided to the tribe. On May 30, 2025, the City provided the tribe with the proposed mitigation measures. The City followed up on July 29, 2025 and August 5, 2025 seeking comments on the proposed mitigation measures. As of the date of this public review period, the City has not received correspondence from the San Luis Rey Band, and consultation is considered ongoing.

The Rincon Band of Luiseño Indians (Rincon Band) responded on November 26, 2024, requesting any existing documents pertaining the project, including, but not limited to, the cultural survey, record search results, and geotechnical reports. The Rincon Band also requested consultation on the project. The City and the Rincon Band held a meeting on March 5, 2025 to discuss the project and potential impacts to tribal cultural resources. The Rincon Band requested additional information related to the project including, but not limited to, staging areas, and the biological resources report. The Rincon Band also provided a confidential letter to the City on May 7, 2025 that indicated general agreement with the proposed cultural mitigation measures. The Rincon Band requested a revision to the Cultural Resources Assessment Memorandum. On August 5, 2025 the City provided Rincon Band with the revised Cultural Resources Assessment Memorandum, and the Rincon Band requesting additional mitigation measures. Consultation with the Rincon Band is ongoing as of the date of publication of this IS/MND. On September 25, 2025, the Rincon Band agreed with the additional mitigation measures and concluded consultation.

3.19 Utilities and Service Systems

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

Discussion

a) Would the project 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?

No Impact. As discussed in Section 2.3, Project Characteristics, project construction would require the relocation of some existing segments of water, sewer, storm water drainage, and natural gas lines beneath the project site roadways to accommodate construction of the proposed storm water drainage culverts and pipelines. The relocation of these existing public utility lines is included as part of the proposed project, and therefore, this IS/MND already analyzes the potential environmental effects for the project, including the relocation of existing utility facilities. The project

would not require the relocation or construction of any additional public utility infrastructure not previously discussed in this IS/MND, and the proposed relocation of existing utility lines would not result in any additional impacts beyond those disclosed throughout this IS/MND. No additional impact would occur.

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

No Impact. The proposed project involves improvements to the City's existing storm water drainage infrastructure system. The project would not include any uses that would require water supplies beyond the nominal amount required during project construction activities for dust suppression, equipment rinse off, etc. It is anticipated that any demand for water use would cease at the end of construction. Therefore, no impact to water supplies would occur.

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

No Impact. The proposed project involves improvements to the City's existing storm water drainage infrastructure system. The project would not include any habitable land uses that would necessitate wastewater treatment. Therefore, no impact to wastewater treatment capacity would occur.

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

Less Than Significant Impact. The proposed improvements to the City's existing storm water drainage infrastructure system would not lead to a permanent increase in solid waste generation. During construction, waste would be limited to debris from the removal of linear strips of existing pavement and subsurface material. Debris from project construction would be brought to the closest landfill, Miramar Landfill, which has remaining capacity of approximately 11 million tons, with estimated closure occurring in the year 2031 (CalRecycle 2024). Project construction debris would be recycled, reused, or diverted to the extent feasible and would comply with California's construction debris recycling requirements, pursuant to the California Green Building Standards Code. Therefore, the project would not generate waste in excess of established state and local standards, or in excess of the capacity of local infrastructure, and impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to Response 3.19(d).

3.20 Wildfire

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

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact with Mitigation Incorporated. As stated in Response 3.9(g), the project site is located in an area surrounded by a built urban environment and is not located in a Very High Fire Hazard Severity Zone (CalFire 2024). However, a Very High Fire Hazard Severity Zone exists in the hillsides surrounding the city, approximately 0.4 miles southeast of the project area. Nonetheless, as a storm water drainage infrastructure project, the project would not increase the risk of wildfire. Additionally, as discussed in Response 3.9(f), project construction could temporarily affect local evacuation routes. However, with implementation of mitigation measure TR-1 in Response 3.17(c), which includes preparation and implementation of a Traffic Control Plan during project construction, potential impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan would be reduced to less than significant levels.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As stated in Response 3.20(a), the project site is approximately 0.4 miles from a Very High Fire Hazard Severity Zone. However, the project would not include a residential or commercial component, and therefore, would not include any habitable structures, the occupants of which would be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed project involves improvements to the City's existing storm water drainage infrastructure system. The project would not include the installation or maintenance of any other 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 would occur.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As stated in Response 3.20(b), the project would not include a residential or commercial component, and therefore, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

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 Impact with Mitigation Incorporated. As detailed in Section 3.4, Biological Resources, no impact would occur to any special-status plant or wildlife species known to occur in the project area. However, short-term construction activities could impact nesting birds protected by the Migratory Bird Treaty Act. Implementation of mitigation measure BIO-1 would minimize potential impacts to nesting birds to less than significant levels. As such, the project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

Further, as indicated in Section 3.5, Cultural Resources, Section 3.7, Geology and Soils, and Section 3.18, Tribal Cultural Resources, project implementation is not anticipated to result in adverse impacts to cultural, tribal cultural, or paleontological resources with implementation of mitigation measures CUL-1, CUL-2, and GEO-1. As such, upon implementation of recommended mitigation measures, the project is not anticipated to eliminate important examples of the major periods of California history or prehistory and impacts would be less than significant in this regard.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 3.1 through 3.20, the proposed project would not result in any significant impacts in any environmental resource areas with implementation of project mitigation measures. Implementation of mitigation measures at the project level would reduce the potential for the incremental effects of the proposed project to be less than considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

The project would result in improved storm water drainage in the project area. Any future improvements to the City's storm water drainage infrastructure would similarly be required to undergo separate environmental review under CEQA on a project-by-project basis. Therefore, the project would not incrementally result in greater land use impacts from a cumulative standpoint.

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

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this IS/MND reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, transportation, and other issues. As concluded in these previous sections, the proposed project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and mitigation measures. Impacts would be reduced to less than significant levels in this regard.

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APPENDIX A:
Air Quality, Greenhouse Gas Emissions, and Energy Consumption Technical Memorandum

APPENDIX B:
Biological Technical Report, Aquatic Resources Delineation Report, and Supplemental Memo

APPENDIX C:
Cultural Resources Assessment

APPENDIX D:
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APPENDIX E:
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