ENVIRONMENTAL CHECKLIST

APOLLO SENIOR CARE FACILITY

PREPARED FOR:

Apollo Senior Care, LLC
2661 Pummelo Court
Escondido, CA 92037

Prepared by:

TTG Environmental & Associates
8885 Rio San Diego Drive, Suite 237
San Diego, California 92108

January 2020

Case# ENV 19-0003

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FINAL

MITIGATED NEGATIVE DECLARATION

FOR APOLLO SENIOR CARE FACILITY
3141 EAST VALLEY PARKWAY, ESCONDIDO 92027
CONDITIONAL USE PERMIT
(City File ENV 19-003)

ENVIRONMENTAL CHECKLIST SUPPLEMENTAL COMMENTS

An Initial Study Environmental Checklist was prepared for this project and is included as a separate attachment to this Mitigated Negative Declaration (MND). The information contained in the Initial Study and the MND Supplemental Comments will be used by the City of Escondido to determine potential impacts associated with the proposed project.

INTRODUCTION

This Mitigated Negative Declaration assesses the environmental effects of the proposed Conditional Use Permit and buildout of three existing parcels for the future development of a 78-unit assisted living facility and the construction of new infrastructure such as electrical lines, waterlines, gas lines, and other utilities.

As mandated by CEQA Guidelines Section 15105, affected public agencies and the interested public may comment on the project during the public review period starting on **November 14, 2019** and ending on **December 3, 2019.** Written comments on the Mitigated Negative Declaration should be submitted to the following address by 5:00 p.m., December 3, 2019**.** Following the close of the public comment review period, the City of Escondido will consider this Mitigated Negative Declaration and any received comments in determining the approval of this project.

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

Contact: Ann Dolmage, Associate Planner
Telephone: (760) 839-4548
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A printed copy of this document and any associated plans and/or documents are available for review during normal operation hours for the duration of the public review period at the City of Escondido Planning Division at the address shown above, and also available on the City's website. The City of Escondido General Plan Update (2012); Final Environmental Impact Report (2012); and Climate Action Plan are incorporated by reference. These documents are available for review at the City of Escondido Planning Counter or can be obtained through the City of Escondido Planning Division or on the City of Escondido Web Site.

PROJECT DESCRIPTION

Apollo Development Group is proposing to construct a 78-unit Assisted Living/Memory Care facility at 3141 East Valley Parkway in the City of Escondido (Figure 1). The site is generally located on the south east side of El Norte Parkway at E. Valley Parkway, south of Hidden Trails Road and north of Old Guejito Grade Road as shown in Figure 2 (APNs 240-110-54, -55, &-56). The project site is approximately 3.3 acres in size and is currently occupied by a 1,734 square foot single-family residence. The project will include 78 units, including 53 assisted living units consisting of studio, one-bedroom, and two-bedroom units, and 25 memory care units consisting of studios and double rooms (Figure 3). The project will include 41 parking spaces for employees and residents/guests. The facility will have a partial floor at ground level and three full floors above. The total building footprint is 59,397 square feet (Figure 4).

Construction is scheduled to commence in June 2020 and will require 18 months to complete. Construction will include demolition of the existing single-family residence, site grading, and construction of the building and parking lot. Cut and fill estimates are expected to be 15,137 cubic yards (cy) of cut and 2,480 cy of fill with 12,656 cy of export material. Cut and fill slopes would be 2:1 and 1.5:1. The applicant will be seeking a grading exemption for the 1.5:1 slopes.

This environmental review is necessary because the parcels contain coast live oak woodland and diegan coastal sage scrub habitat totaling 0.04-acre that would be cleared for site development. Mitigation measures are necessary to offset the removal of the 0.04-acre of habitat at a 1:1 ratio. The site also contains mature oak trees of which 23 would be removed (Figure 5).

PROJECT LOCATION AND ENVIRONMENTAL SETTING

The City of Escondido (City) is located at the northeastern portion of San Diego County, adjacent to the cities of Vista and San Marcos on the west, unincorporated communities of Valley Center to the north and Ramona to the east; and San Diego to the south. The

majority of the property has been altered with an existing single-family structure, garage and driveway. Past uses on the western portion of the parcel include agricultural production (active grove). The northern and western edges of the site consist of manufactured slopes as a result of adjacent roadway construction, and those slopes are landscaped with ornamental plant species. The property is generally sloped to the west and north (irrespective of the manufactured roadway slopes) with elevations on site ranging from 730 to 828 feet above mean sea level. Soils on site consist of Escondido very fine sandy loam (9 to 15 percent slopes, eroded) and Friant rocky fine sandy loam (30 to 70 percent slopes).

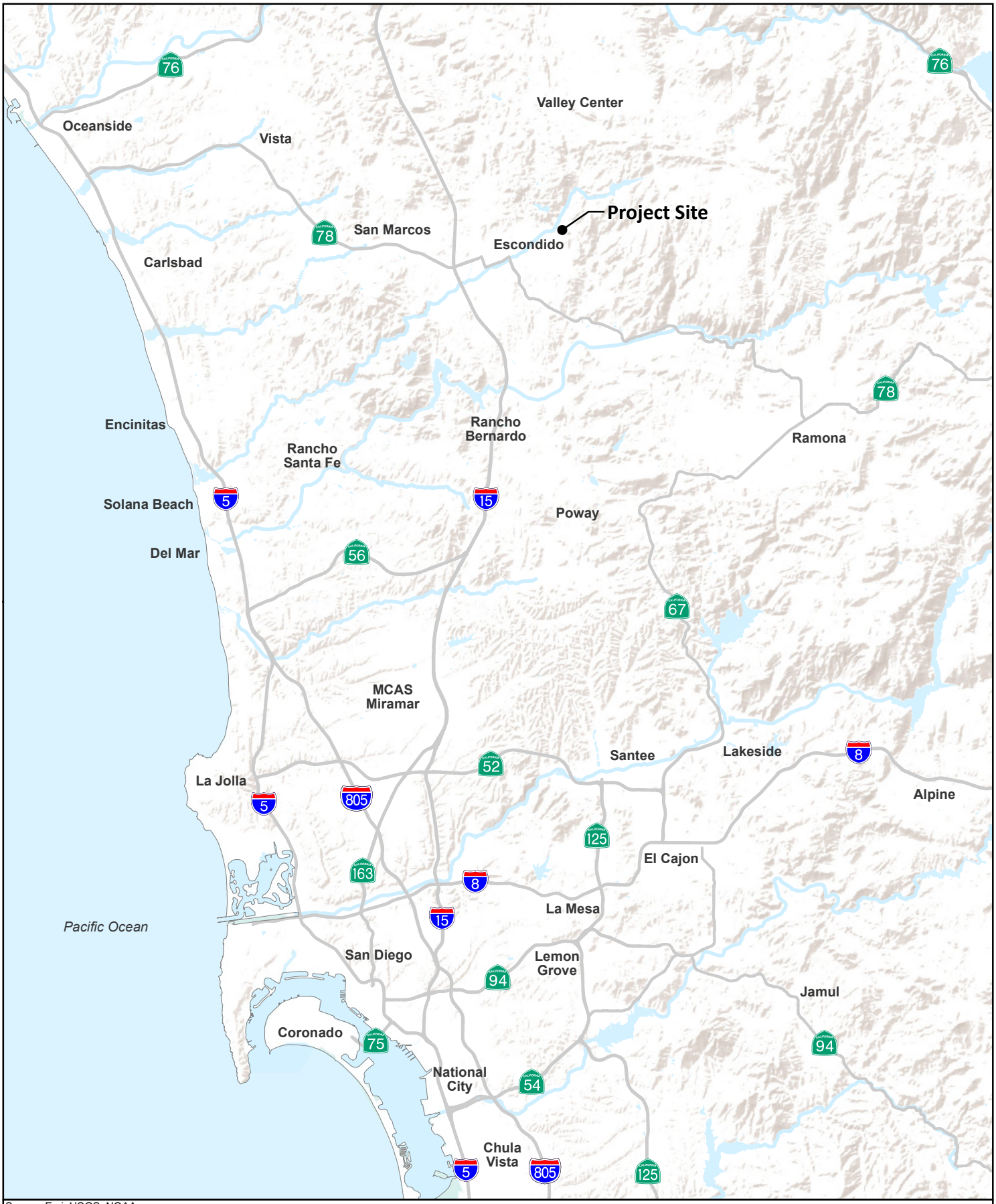
The site is surrounded by Old Guejito Grade Road and an undeveloped parcel to the south, undeveloped land to the east, Ryan Park and Valley High School to the north. Additionally, single-family residential homes are located to the north, south, west and undeveloped open space further east. Dixon Reservoir and associated steep slopes are located further northwest. The General Plan land-use designation for the subject site is Specific Plan and the underlying zoning designation is SPA-5.

Responsible Agency Permit Approvals

The applicant would be required to comply with the NPDES General Permit for Storm Water Discharges Associated with Construction of Land Disturbance Activities (SWRCB Order No. 2009-0009-DWQ, NPDES No. CA2000002), as well as related City requirements for storm water/erosion control.

Anticipated Public Hearings

Discretionary permits associated with this project include the issuance of a conditional use permit (CUP). The project is subject to a public hearing with the Planning Commission. Public noticing is required for the Notice of Intent to Adopt the Draft Mitigated Negative Declaration. The proposed project is tentatively scheduled for planning commission consideration and adoption on January 14, 2020 for the certification of the Mitigated Negative Declaration and the purchase of mitigation credits from the Daley Ranch Mitigation Bank.



Source: Esri, USGS, NOAA

Figure 1
APOLLO SENIOR CARE PROJECT

TTG ENVIRONMENTAL

0 5 Miles

Regional Location Map

Source: SANDAG & SanGIS 2017

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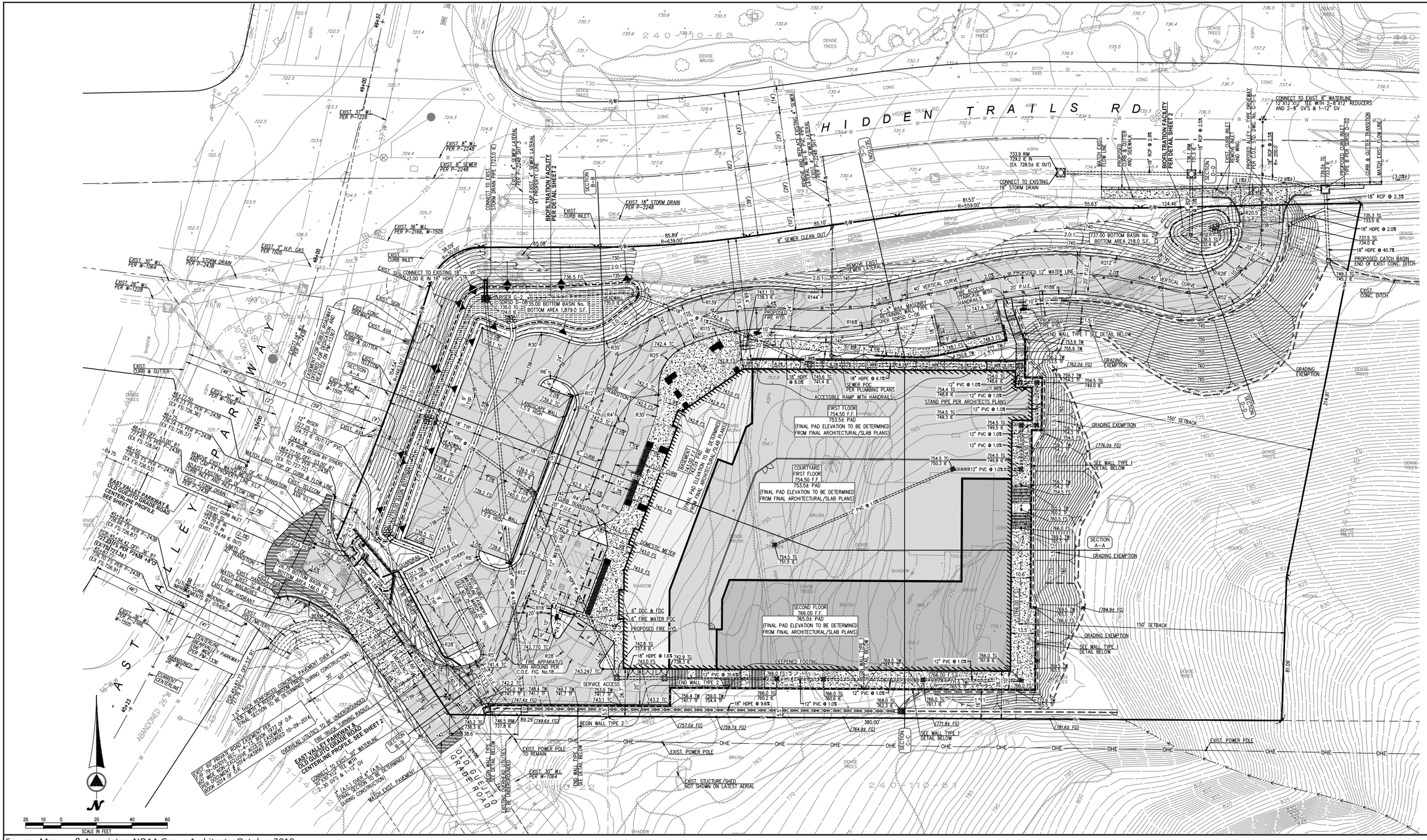
0 2,000 Feet

Figure 2
APOLLO SENIOR CARE PROJECT

Project Vicinity Map



Source: Masson & Associates, NOAA Group Architects, October 2019

Figure 3

APOLLO SENIOR CARE PROJECT

Site Plan

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1 **ASSISTED LIVING ENTRY FROM PARKING LOT**
Scale: 12" = 1'-0"

2 **MEMORY CARE ENTRY FROM PARKING LOT**
Scale: 12" = 1'-0"

3 **PORTE-COCHERE**
Scale: 12" = 1'-0"

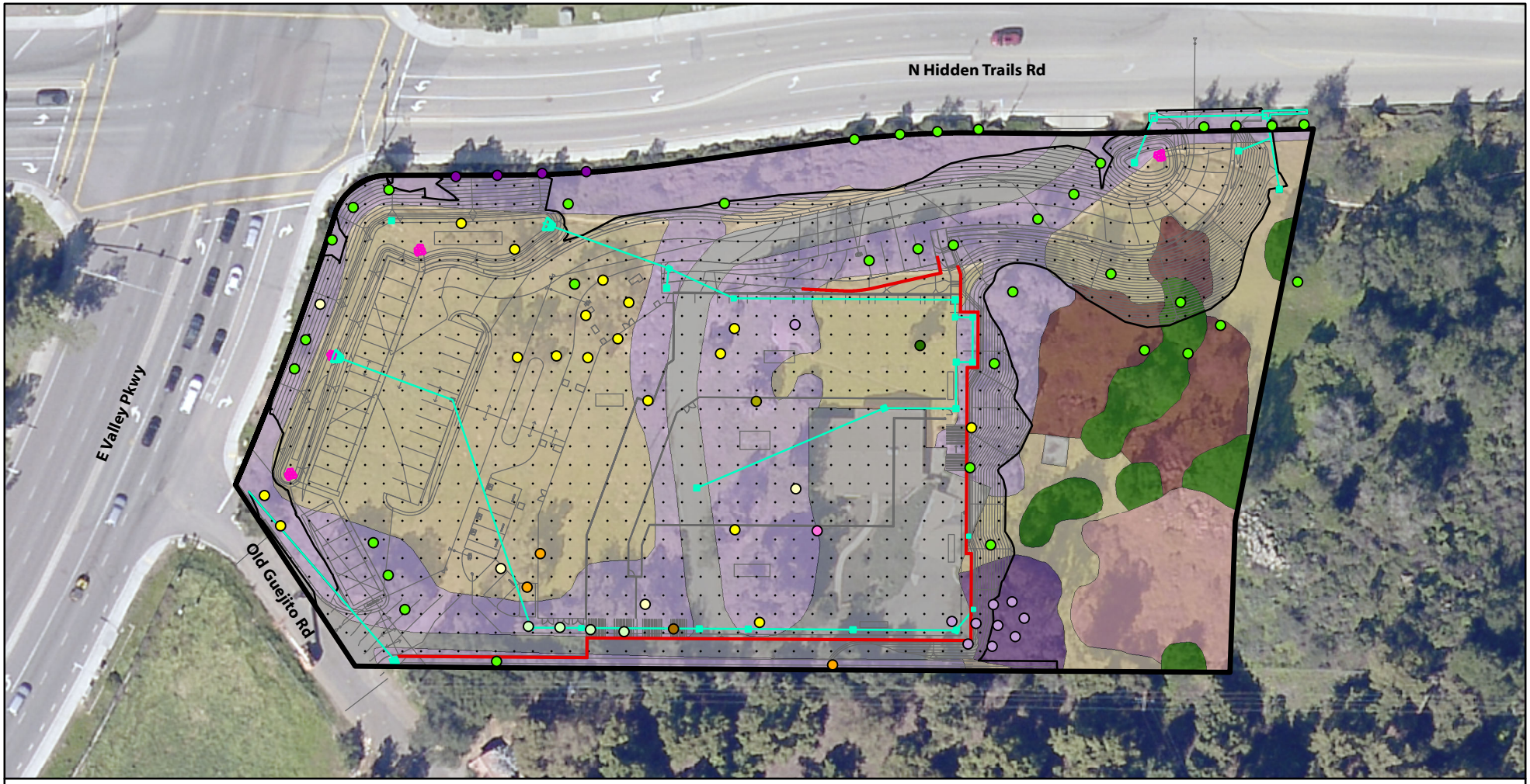
4 **COURTYARD**
Scale: 12" = 1'-0"

Source: NOAA Group Architects, 2019

Figure 4
APOLLO SENIOR CARE PROJECT

TTG ENVIRONMENTAL

Perspectives



Project Boundary
Project Impacts
Retaining Wall
Storm Drain
Energy Dissipator (Rip-rap)

Vegetation

- Coast Live Oak Woodland
- Diegan Coastal Sage Scrub
- Diegan Coastal Sage Scrub - Disturbed
- Eucalyptus Woodland
- Ornamental
- Disturbed Habitat
- Developed

Species

- Ash
- California pepper
- Canary Island palm
- Crepe myrtle
- Eucalyptus
- Juniper
- Norfolk Island pine
- Oak
- Olive
- Pine
- Windmill palm

[1] Source: Ahles Landscape Architecture, Inc.

Source: Alden Environmental, 2019

TTG ENVIRONMENTAL

0 80 Feet

Figure 5
APOLLO SENIOR CARE PROJECT

Biological Resources

I. AESTHETICS

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 the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
d. *Create a new source of substantial light or glare that would adversely affect day or nighttime views?*

a) **Less than Significant Impact**. For purposes of CEQA, a scenic vista is generally considered an expansive view of a unique or remarkable landscape, which is observable from a location accessible to the public. The Escondido General Plan Resource Conservation Element and Land Use and Community Element related to visual resources apply to the proposed project as follows:

Resource Conservation Element Goal 3
"Preservation of significant visual resources such as ridgeline, hillsides, and viewsheds serve as a scenic amenity and contribute to the quality of life for residents."

Visual Resource Policy 3.5
Regulate development on intermediate ridges, hilltops, and hillsides to preserve the natural appearance and landform, and minimize impacts on terrain with a slope greater than 15 percent subject to the following requirements:

Slopes Greater than 15 Percent

a) Locate development to avoid potentially hazardous areas and environmentally sensitive areas, as well as to avoid dislocation of any unusual rock formations or any other unique or unusual geographic feature.

b) Design development to minimize grading requirements by incorporating terracing, padding, and cut-and-fill grading that conforms to the natural contours of the site and protects the visual continuity of the hillside.

c) *Cluster the overall development pattern in accordance with General Plan provisions to preserve the maximum amount of open spaces and natural setting and to reduce grading, erosion, and runoff potential.*

d) *Landscape the site with existing trees and other natural vegetation, as much as possible, to stabilize the slopes, reduce erosion, and enhance the visual appearance of the development.*

e) *Minimize the visual impact of development on adjoining residential areas to the extent feasible.*

The vegetated hillsides and crop of mature trees of the project site and adjacent undeveloped lands provide a pleasing view of an expansive landscape and distant views of open space areas and mountains to the north and east. However, the project site is within an urbanized area undergoing residential and public institution buildout. The ongoing planned development and views of the existing residential uses in the surrounding area have reduced the overall visual quality of the project area. Therefore, the visual landscape is not considered to have the attributes of a unique or remarkable landscape.

The City does not specifically designate scenic vistas. Although not officially designated, major roads in the City in proximity to the project site include El Norte Parkway and Valley Parkway, and major public open space areas include Lake Hodges Reservoir, Lake Wohlford, Lake Dixon and Kit Carson Park. The site is visible from El Norte Parkway and Valley Parkway. Due to its distance, the project site is not visible from the open space areas. The majority of the site sits atop a flat graded pad and typically at a higher elevation than the surrounding residential uses. The northern and eastern project boundary consists of vegetated slopes which minimize direct views to and from the project site. The proposed 3-story building and partially visible basement will be approximately 35 feet in height, which is within the City's allowable building height limit. The project would be visible from the surrounding public views. However, the project design includes landscaping and integration of oak trees to enhance views of the developed site. Although highly visible, the project is not expected to substantially interrupt or obstruct available views from any scenic vistas. No designated scenic vistas would be impacted by the project. Thus, impacts to scenic vistas would be less than significant.

b) **No Impact**. There are no officially designated or eligible highways within the City. The closest State Scenic Highway is SR 78 through the Anza-Borrego Desert State Park, over 30 miles east of the City. Therefore, no impacts to scenic resources within a State Scenic Highway would occur.

c) **Less than Significant**. The presence and movement of heavy construction equipment and staging areas could temporarily degrade the existing visual character and/or quality of the project site and surrounding area for existing developed land uses. Buildout of the project is anticipated to occur over an 18-month period, with construction anticipated to begin in June 2020 and end in November 2021. Construction activities would require the use of various types of equipment, such as scrapers, graders, dozers, and trucks as well as signs, cones, and trash receptacles. Project construction would involve the temporary use of fenced staging areas for construction equipment and materials. Although these staging areas would be located in disturbed areas, construction equipment and materials would be visible to residents, and at parks and school sites over an 18-month duration. Thus, construction activities would temporarily degrade the existing visual character of the site in the vicinity of developed areas. The temporary impacts to the visual character of the site would be less than significant given the short-term nature of construction activities.

The subject parcel includes vegetated hillsides and crops of mature oak trees that are located throughout the surrounding parcel. Grading would occur throughout the site, resulting in the removal of mature trees and alterations to the existing natural landform, including vegetated slopes located along the eastern portion of the site. The project includes an exemption to the grading design guidelines to allow an increase in the height of cut and fill slopes beyond the City grading design criteria. The project is within the Northeast Gateway SPA 5, which emphasizes criteria assuring high-quality architectural design for the residences, preservation of all slopes over 25% as open space, and sensitivity to views along Valley Parkway and other public streets. The project site plan includes a large-scale building with street frontage entryways to courtyard spaces and gardens. The building façade includes visual relief and articulation provided by balconies. Although the large-scale project is located adjacent to small-scale buildings and single-family homes to the south and west, there are setbacks provided by a surface parking lot along the frontage road to the north and west. Landscaping and lighting will be included throughout the project site. The use of setbacks, treatment of the building façade, integration of street-frontage, use of courtyards and gardens, lighting and landscaping treatment will enhance the visual integrity of the project area. Project implementation would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of the site and its surroundings. The overall aesthetic quality of the design would complement the surrounding residential and public uses.

Additionally, per mitigation measure Bio-1 described in Section I, Biology, any mature tree removed as part of the development would be replaced as required by the City's Grading Ordinance and tree preservation requirements. The upper

portions of the slopes would be revegetated with appropriate materials and irrigated to provide stabilization, reduce erosion, and enhance the visual appearance of the development.

The proposed project would be generally consistent with the existing single-family residential and urban character of the surrounding area. While the proposed project would change the character of the project site from a single-family residential development to an assisted living facility, it would not significantly degrade the existing visual character or quality of the site and impacts would be less than significant.

Any mature tree removed as part of the development would be replaced as required by the City's Grading Ordinance and tree preservation requirements. Therefore, the proposed project would be consistent with applicable zoning and other regulations governing scenic quality and would not result in any adverse impacts directly, indirectly or cumulatively to the visual character or quality of the project area.

d) **Less Than Significant Impact**. Existing lighting sources on the site and surrounding area generally consist of any street lights; home lighting, and vehicle headlights. The proposed project includes light standard heights, intensities, locations, and light reduction strategies to eliminate light spilling onto adjacent properties. The proposed lighting required for the assisted living facility would be consistent with lighting for the surrounding uses including the adjacent single-family homes to the west. All lighting fixtures would be shielded from neighboring properties. Lighting for the new development would be consistent with the City's lighting standards and would not create a substantially new source of light or glare. All new lighting would be required to be in compliance with the City's Outdoor Lighting Ordinance, which would ensure that potential impacts associated with glare or light will be minimized to below a level of significance.

II. AGRICULTURE RESOURCES

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation commission, to non-agricultural use?

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

c. 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?*

a-b) **Less than Significant Impact.** The site is designated as a Farmland of Local Importance by the Farmland Mapping and Monitoring Program of the California Resources Agency, and as identified in the City General Plan Final Environmental Impact Report (Figure 4.2-1; 2012). It is not listed as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is designated as "Other Land" and is not under a Williamson Act contract. The subject site appears to have been used for agricultural purposes (orchards) from at least 1946 through 1980; but is no longer an active agricultural land use. Therefore, development of the site would not result in the conversion of agricultural lands to non-agricultural uses. Impacts on existing or potential agricultural activity in Escondido or North San Diego County would be less than significant with project implementation.

c-e) **No Impact**. The subject parcel is identified as disturbed and native habitat. No farmland, forest land, timberland, or other agricultural uses occur on the project site; or surrounding area. The property is not listed as agricultural or prime farmland by the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program. The project site and surrounding area is not listed as prime Agricultural Lands (General Plan 2012). Therefore, the proposed project will not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use or result in the conversion of forest land to non-forest use. The project site does not contain any Williamson Act or other agricultural land contracts. Accordingly, no associated impacts to agricultural-related zoning or contract land would result.

III. AIR QUALITY

Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

The following analysis is based on the Air Quality and Greenhouse Gas Report prepared for the project (Scientific Resources Associates 2020). The proposed Apollo Senior Care Facility includes both construction and operational impacts. Construction impacts include emissions associated with site grading/preparation, utilities installation, construction of buildings, architectural coatings application, and paving. Operational impacts include emissions associated with the project, including traffic, at full buildout.

a-b) **Less Than Significant Impact**. Projects that are consistent with existing General Plan documents, which are used to develop air emissions budgets for the purpose of air quality planning and attainment demonstrations, would be consistent with the SDAB's air quality plans, including the Regional Air Quality Strategy (RAQS) and the State Implementation Plan (SIP). Both of these air quality plans contain strategies for the region to attain and maintain the ambient air quality standards. Provided the project is in compliance with applicable Rules and Regulations adopted by the SDAPCD through their air quality planning process, the project would not conflict with or obstruct implementation of the RAQS or SIP.

The site is within the Northeast Gateway Specific Plan Area. The Northeast Gateway Specific Plan Area is designed primarily for residential development. The project site is within an area designated for low-density residential dwellings. The project is considered to be an allowable use with the underlying zoning requirements and planned land uses within the Specific Plan Area.

The project would be in compliance with applicable Rules and Regulations adopted by the SDAPCD and would therefore not conflict with or obstruct implementation of the RAQS or SIP and would not result in a significant impact.

<u>Construction Impacts</u>

An analysis was conducted assuming that construction would be completed in a single phase. The project construction would be completed in 18 months. Construction was assumed to commence in June 2020 and be complete in November 2021. Construction phases would consist of demolition of the existing residential dwelling; grading and utilities installation; building construction; paving; and architectural coatings application.

Emissions from construction of the project were estimated through the use of the CalEEMod Model (SCAQMD 2016). It was assumed that standard fugitive dust control measures would be implemented, including watering of active sites three times daily.

For the purpose of estimating emissions from the application of architectural coatings, it was assumed that water-based coatings that would be compliant with SDAPCD Rule 67.0.1 VOC limitations would be used for both exterior and interior surfaces. Rule 67.0.1 requires flat architectural coatings to meet a VOC limit of 50 grams/liter, and non-flat coatings to meet a VOC limit of 100 grams/liter. For the purpose of this analysis, this assumption was included in the CalEEMod Model by assuming that the architectural coating emissions would meet a VOC limit of 50 grams/liter for interior coatings and 100 grams/liter for exterior coatings.

According to the air quality analysis conducted for the project (*Table 4, Estimated Construction Emissions*, SRA 2019), emissions associated with construction are below the significance thresholds for all construction phases and pollutants. Construction of the project would be short-term and temporary. Thus, the emissions associated with construction would not result in a significant impact on the ambient air quality.

Operations

The main operational impacts associated with the project would be impacts associated with traffic. Minor impacts would be associated with energy use and landscaping. To address whether the project would result in emissions that would violate any air quality standard or contribute substantially to an existing or proposed air quality violation, the operational emissions associated with the project were compared with the significance thresholds.

Based on the estimates of the emissions associated with project operations, the emissions are below the significance criteria for all pollutants (*Table 5, Estimated Operational Impacts,* SRA 2020). Because emissions are less than the significance levels, they would not result in a significant air quality impact.

A project could result in a cumulatively significant impact if it would generate emissions that constitute a cumulatively considerable net increase of PM10 or exceed quantitative thresholds for O3 precursors, oxides of nitrogen (NOX) and volatile organic compounds (VOCs). The project site is in an area that is largely developed, and emissions from existing projects are part of the air quality background.

No specific projects were identified in the immediate vicinity of the project that would be likely to be constructed simultaneously with the project. Furthermore, the impacts associated with the project are below the significance thresholds. Because the project's emissions are less than significant, the combined emissions during construction and operations would not be expected to result in a cumulatively considerable impact to air quality.

c) **Less than Significant Impact**.

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot spots." According to Caltrans guidance (University of California Davis 1998), CO "hot spots" have the possibility of forming at intersections with a level of service (LOS) of E or F. Due to the small size of the project, the project would not generate substantial traffic that would results in a degradation in LOS at nearby intersections. It is therefore anticipated that no CO "hot spots" would result from project-related traffic.

Construction and operations would result in minor emissions of TACs from construction equipment and motor vehicles. The project is an assisted living facility and is not a major source of TACs. The amounts of TACs that would be generated from construction equipment and motor vehicles is negligible and would not result in a significant impact to sensitive receptors.

d) **No Impact**. During construction, diesel equipment operating at the site may generate some nuisance odors; however, due to the distance of sensitive receptors to the project site and the temporary nature of construction, odors associated with project construction would not be significant.

According to the SCAQMD CEQA Air Quality Handbook (SCAQMD 1999), land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The Apollo Senior Care Facility does not include any of the operations cited in the SCAQMD's handbook. Odor impacts would not be significant.

IV. BIOLOGICAL RESOURCES

The effects of a project on biological resources are considered to be significant if the proposed project would:

a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
c. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
e. *Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?*
f. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

a) **Less Than Significant Impact with Mitigation**. The analysis provided in this section is based on a Biological Letter Report prepared for the proposed project by certified biologist, Greg Mason of Alden Environmental (Alden Environmental July 2019). Mr. Mason conducted a biological survey of the project site on July 6, 2019 to identify sensitive biological resources that occur on the site, the potential impacts of the preliminary development plan on those resources, and potential mitigation for the impacts to sensitive biological resources.

Based on the biology report, and as shown in Table 1 below, the site contains six vegetation communities: coast live wood oakland, diegan coastal sage scrub, diegan coastal sage scrub-disturbed, eucalyptus woodland, ornamental, disturbed, and developed habitat (Refer to Figure 6).

Tree Survey Results

A tree survey was conducted on the project site by Ahles Landscape Architecture, Inc. Trees were mapped, and their dripline and diameter-at-breast-height measurements were recorded along with notations of which trees are planned to be preserved and which are planned to be removed. There are 81 trees on site including oak, pine, olive, ash, California pepper, crape myrtle, Canary Island date palm, eucalyptus, juniper, Norfolk Island pine, and windmill palm.

Sensitive Plant Species

No sensitive plant species were observed onsite during the site visit, although it was conducted at a time of year when most sensitive annual species have finished blooming. The CNDDB search did not identify any sensitive species on site or in the vicinity of the site. Based on the site's past and current land uses/disturbances and the limited area of native vegetation present, the potential for sensitive plant species to occur on site is considered low.

Sensitive Animal Species

Based on the site's past and current land uses/disturbances and the limited area of native vegetation present, the potential for sensitive animal species to occur on site is considered low, and none were observed or detected during the site visit. Three sensitive species have been reported to the California Native Diversity Database (CNDDB) in the vicinity of the project including California coastal gnatcatcher, least bell's vireo, and Dulzura pocket mouse.

Table 1
Vegetation Communities and Land Cover

Biological Resource	Existing On Site (acres)	Impacted Onsite	Impacted Offsite	Total Impacted
Coast live oak woodland	0.13	0.01	0.00	.01
Diegan coastal sage scrub	0.15	0.00	0.00	0.00
Diegan coastal sage scrub-disturbed	0.17	0.03	0.00	0.03
Eucalyptus woodland	0.06	0.02	0.00	0.02
Ornamental	1.10	0.83	0.02	0.85
Disturbed Habitat	1.20	1.10	0.00	1.10
Developed	0.49	0.48	0.00	0.48
Totals	**3.30**	**2.47**	**0.02**	**2.49**

Source: Apollo Assisted Living Project, Biology Letter Report (Alden Environmental 2019).

Coastal California Gnatcatcher. The federal threatened coastal California gnatcatcher has been reported to the CNDDB in the vicinity of the site, and the U.S. Fish and Wildlife Service has designated Critical Habitat for the gnatcatcher immediately off site to the east. However, the Draft Subarea Plan (Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001) states:

Although coastal California gnatcatchers have occasionally been sighted in the Northeastern Habitat Area, coastal sage scrub habitats in the northeast core are generally considered suboptimal for the gnatcatcher because they are situated at the eastern edge of the species' distribution and above the typical elevational range of the species in San Diego County. The resulting climatic conditions (lower temperatures) constrain the gnatcatcher's ability to utilize these areas throughout the year. Only one gnatcatcher locality has been recorded in this area despite extensive surveys there.

Least Bell's Vireo (*Vireo bellii pusillus*). The federal endangered least Bell's vireo has been reported to the CNDDB in the vicinity of the site; however, there is no least Bell's vireo habitat (riparian woodland and scrub) present on site, so the species is not expected to occur there.

The Dulzura Pocket Mouse (*Chaetodipus californicus femoralis*). This California Species of Special Concern was reported to the CNDDB in the vicinity of the site; however, it is not included in the Draft Subarea Plan list of species occurring or potentially occurring in the City. This pocket mouse is primarily associated with mature chaparral, which is not present on site. Therefore, the Dulzura pocket mouse is not expected to occur there.

Nesting Birds

The federal Migratory Bird Treaty Act (MBTA) regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others. Disturbance that causes nest destruction or abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." Given the presence of shrub- and tree associated vegetation on site, there is potential for nesting on site by MBTA-regulated species.

Wildlife Corridors

The site is located on the eastern edge of the developed City, and according to the Draft Subarea Plan is not within a Biological Core and Linkage Area, which is a large block of natural habitats that "contribute to regional landscape linkages that connect a number of diverse and sensitive habitats, plants, and animals between northern San Diego County's coastal environments and its more interior and drier foothill habitats." Therefore, the site is not a wildlife corridor, nor does it occur within such a corridor.

Jurisdictional Features

There are no drainages or wetland areas on site; as such, there are no areas that would be considered jurisdictional by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board.

Impacts

Based on the project's preliminary development plan impact footprint, construction of the project would impact a total of 2.47 acres on site, as well as 0.02 acre of ornamental vegetation off site (to construct a storm drain system; Table 1; Figure 6). The project would impact 0.01 acre of coast live oak woodland and 0.03 acre of Diegan coastal sage scrub-disturbed. These impacts would be significant and require mitigation because coast live oak woodland and Diegan coastal sage scrub-disturbed vegetation communities are considered "sensitive biological habitats." Per the Subarea Plan, mitigation ratios are 2:1 for coast live oak woodland and 1:1 for coastal sage scrub. The project would therefore be required to mitigate up to 0.05 acre of sensitive biological habitat. Impacts to eucalyptus woodland, ornamental, disturbed habitat, and developed would be less than significant because they are not sensitive, and no mitigation would be required.

The project's tree survey indicates that 26 oaks would be removed. Replacement standards in Section 33-1069(b) of the Zoning Code require replacement with 30 oaks. The project plans to replace 10 oaks onsite. Additional off-site replacement or an alternative solution for the remaining 20 oak trees will be required to mitigate the loss of the mature trees. The loss of mature and protected trees would be considered a significant impact.

Mitigation Measures

Bio-1: Per the City's Subarea Plan, sensitive biological habitat that is removed shall be mitigated either on site or off site by the planting of the same habitat species at a minimum ratio of one to one (1:1) for coastal sage scrub and two to one (2:1) for impacts to coast live oak woodland. If replacement of sensitive biological species and/or habitat is not feasible on or off site, other equivalent mitigation measures may be considered by the director.

Prior to issuance of the grading permit, the applicant will mitigate for impacts to sensitive biological habitats (coast live oak woodland and Diegan coastal sage scrub-disturbed) through purchase of credits for 0.05 acre at the City of Escondido Daley Ranch Conservation Bank or another approved habitat mitigation bank.

Bio-2: Mitigation for the loss of mature and protected trees shall be conducted per City Municipal Code Sec. 33-1069 (Vegetation Protection and Replacement Standards) in coordination with the City. If mature trees cannot be preserved on-site, they shall be replaced at a minimum one to one (1:1) ratio. The preferred replacement is a tree(s) of equal size and caliper. Protected trees shall be replaced at a minimum two to one (2:1) ratio. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the director, based on the specific circumstances of each request, the characteristics and condition (size, age, and location) of the individual trees involved, and any professional report.

If any required replacement trees cannot be planted on-site, the applicant or owner shall coordinate with the City of Escondido Public Works Department and Planning Division to arrange for the planting of trees within one or more Landscape Maintenance Districts. The applicant will replace 10 trees onsite. The applicant or owner shall be responsible for the planting of the 20 off-site replacement trees, and shall be responsible for maintaining said trees for an establishment period of at least twenty-four (24) months. If one or more Landscape Maintenance Districts are not available to accommodate the trees, a City-owned park or open space area may substitute, at the discretion of Public Works and Planning. If the Landscape Maintenance District, park, or open space area is not irrigated, the applicant or owner shall be responsible for watering the off-site replacement trees during the 24-month establishment period.

Bio-3: To ensure that MBTA-regulated species' nesting activities are not impacted, a pre-construction general nesting bird survey will be conducted within all potential nesting habitat (in this case, shrub- and tree-associated vegetation on site) that may be impacted by active construction during the general avian breeding season (February 1 through August 31). The pre-construction survey will be conducted no more than 7 days prior to initiation of construction. If no active avian nests are identified within the development impact footprint area or within a 300-foot buffer of the proposed development project area (as feasible), no further mitigation is necessary. If active nests of avian species regulated by the MBTA are detected within the proposed development footprint or within a 300-foot buffer, construction will be halted until the young have fledged, until a qualified biologist has determined the nest is inactive, or until appropriate mitigation measures that respond to the specific situation have been developed and implemented in consultation with the regulatory agencies.

The results of the survey will be provided in a report to the Director, City of Escondido Planning Department, for concurrence with the conclusions and recommendations.

b) **Less than Significant Impact.** No jurisdictional wetlands were identified onsite. The project would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which identifies all construction BMP requirements required by Section IV, in accordance with Order No. 99-08-DWQ of the *State General Permit for Stormwater Discharges Associated with Construction Activity* (State General Construction Permit). The City requires that both erosion and sediment control BMPs be installed and maintained for all applicable projects in addition to good housekeeping and site and materials management.

Implementation of standard BMPs identified in the project's SWPPP would serve to minimize potential indirect impacts to any offsite drainages. Potential impacts to offsite drainages would be less than significant.

c) **No Impact.** No federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) were identified onsite as part of the biological field survey (Scheidt 2017). Therefore, project development would result in no impacts to wetlands.

d) **Less than Significant Impact.** Areas that serve as wildlife movement corridors are considered biologically sensitive. Wildlife corridors can be defined in two categories: regional wildlife corridors and local corridors. Regional corridors link large sections of undeveloped land and serve to maintain genetic diversity among wide-ranging populations. Local corridors permit movement between smaller patches of habitat. Target species for wildlife corridor assessment typically include species such as bobcat, mountain lion, and mule deer.

High quality corridors connect extensive areas of native habitat and are not degraded to the point where free movement of wildlife is significantly constrained. Typically, high quality corridors consist of an unbroken stretch of undisturbed native habitat. Since the project site is bordered on all sides by existing residential and agricultural development, it is not considered to be part of a wildlife corridor.

Large mammals, such as mule deer *Odocoileus hemionus* and mountain lion *Felis concolor* prefer large unfragmented natural areas that offer extensive adequate forage or hunting opportunities as well as the opportunity for movement across long distances. Because the project site is situated within a developed, essentially urbanized area, these opportunities are very limited. The project site

is unsuitable for use by large mammal species because of its disturbed nature and surrounding land uses.

Native Wildlife Nursery Sites, which are considered sensitive resources that require protection, are defined as sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Features such as individual raptor or woodrat nests do not constitute places where wildlife *concentrate*, thus they do not meet this definition and are therefore not considered Native Wildlife Nursery Sites. No Native Wildlife Nursery Sites occur on or near the project site, and none will be impacted by project implementation.

e) **Less than Significant with Mitigation Incorporated.** As stated above, the site contains sensitive habitat associated with coast live oak woodland and Diegan coastal sage scrub-disturbed. The loss of this sensitive habitat, including the loss to mature oak trees, would result in a significant impact. With implementation of the mitigation measures listed above, this impact would be reduced to below a level of significance.

f) **No Impact**. The project site is located within the boundaries of the City's Draft Multiple Habitat Conservation Program Subarea Plan (Draft Subarea Plan; Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001). It is located in the southern end of the Northeastern Habitat Area, and the vegetation shown on Figure 3-1 of the Draft Subarea Plan is agriculture. The site is not within a Biological Core and Linkage Area (Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001). Therefore, no conflicts with provisions of an adopted HCP or NCCP, or other approved conservation plan, would occur with the proposed project.

V. CULTURAL RESOURCES

The effects of a project on cultural resources are considered to be significant if the proposed project would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §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 formal cemeteries?

a) **Less than Significant Impact with Mitigation**. A records search, field survey, and preparation of an archaeological letter report were prepared for the project

(Brian F. Smith and Associates 2019). The field survey was conducted on May 8, 2019 by Brian F. Smith acting as the Principal Investigator and Senior Project Archaeologist Tracy Stropes. Based on the natural location of the project and record search results, there is a high potential to encounter both prehistoric and historic resources within the subject property. The project is located at the base of the bedrock-laden foothills east of the Escondido Creek and northwest of the San Pasqual Valley. This area is known to contain numerous prehistoric resources associated with the exploitation of resources found near the creek and within the surrounding foothills. Further, the two closest prehistoric resources to the project consist of the metate uncovered during the planting of an orchard (SDI-1038) and a lithic scatter (SDI-1039). Subsurface artifacts were uncovered at both sites during agricultural activities. Therefore, the agricultural use of the property, the presence of a structures as visible on the historic aerials, the location of the property to both natural sources of water and the bedrock-laden foothills, and the number of historic and prehistoric resources previously recorded in the area, the subject property is considered highly sensitive for cultural resources.

During the survey the property was characterized as a partially developed parcel containing a 1950s-era residence, garage, and associated landscaping and hardscape. The residential development generally is situated within the center third of the subject property located at the end of a paved driveway. The western third of the property currently contains a cleared field formally used as a citrus grove. The eastern third of the property is characterized as steep terrain containing bedrock outcroppings. The bedrock was investigated for use wear; however, no signs of prehistoric use were detected. A small concrete foundation was identified on the slope, approximately 70 feet east of the residence. The foundation likely represents the location where a water tower once stood, based upon the remnants of water pipes and electrical wires for a pump. No midden soils or archaeological resources were observed during the survey; however, the survey coverage was limited by the existing landscaping, hardscape, and single-family residence.

No evidence of any archaeological resources were identified within the property during the survey. The existing residence and associated features appears to have been constructed during the mid-1950s. However, the house is not included in any of the City's historic surveys, is not in a historic district, nor listed on the state or local historic register, therefore, the City does not require further assessment of the existing structure. The project is not expected to cause a substantial adverse impact to a historical resource.

b) **Less than Significant Impact with Mitigation**. In addition to the standing structures, the project parcel is situated within an area of high sensitivity for cultural resources. The subject property is located at the base of the bedrock-laden foothills just over a quarter-mile from Escondido Creek. The location of the property to these natural features would have been advantages for the prehistoric inhabitants of the area. Further, elements of the two closest archaeological resources were discovered subsurface in agricultural fields located within similar terrain as the current project. Therefore, due to the presence of numerous recorded cultural resources located near the property of the project area and the limited visibility encountered during the archaeological survey, the potential exists that buried cultural deposits may be present under the landscaping, hardscape, and structures. Based upon the potential to encounter buried archaeological deposits or artifacts associated with the prehistoric occupation along the Escondido Creek as well as the historic use and development of the property, archaeological and Native American monitoring of any earth-moving activities associated with the demolition of the existing structure is recommended for the project. Implementation of the mitigation measures listed below would reduce impacts to cultural resources to a less than significant level (see Section XVIII, Tribal Cultural Resources).

c) **Less than Significant**. No human remains are anticipated to be discovered during project construction due to the lack of burial sites recorded on the site and steep topography of the property. In accordance with Health and Safety Code 7050.5, CEQA 15064.5(e), and Public Resources Code 5097.98, if any human remains are discovered, all work would be halted in the vicinity of the discovery, the appropriate authorities would be notified, and standard procedures for the respectful handling of human remains would be adhered to.

VI. ENERGY

The effects of a project on energy resources are considered to be significant if the proposed project would:

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?

a,b) **Less than Significant**. California's Renewable Portfolio Standard requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Further, as

amended in 2015 by SB 350, retail sellers of electric services must increase procurement from eligible renewable energy resources to 40 percent of total retail sales by 2024, 45 percent of total retail sales by 2027, and 50 percent of total retail sales by 2030. As amended in 2018 by SB 100, retail sellers of electric services must increase procurement from eligible renewable energy resources to 44 percent of total retail sales by 2024, to 50% of total retail sales by 2026, to 52% of total retail sales by 2027, and to 60% of total retail sales by 2030.

Title 24, Part 6, of the California Code of Regulations regulates the design of building shells and building components. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The California Public Utilities Commission, CEC, and the ARB also have a shared, established goal of achieving Zero Net Energy (ZNE) for new construction in California. The key policy timelines include: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030.

The ZNE goal generally means that new buildings must use a combination of improved efficiency and renewable energy generation to meet 100 percent of their annual energy need.

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) are commonly referred to as CALGreen, and establish voluntary and mandatory

The project would construct a maximum of 78 assisted living dwelling units. The Title 24, Building Standards Code, California Energy Code and California Green Building standards would be applicable to the project. Adherence to Title 24, the Building Standards CEC and Green Building Standards would minimize wasteful and inefficient use of energy resources during construction and operation of the project. Impacts would be less than significant level.

VII. GEOLOGY AND SOILS

The effects of a project on geology and soils are considered to be significant if the proposed project would:

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 risks to life or property?*

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

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

The analysis provided in this section is based on the Escondido General Plan Update (2012).

a-d) **Less than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act identifies no active faults within Escondido; consequently, the risk of surface rupture is low. Several earthquake faults exist in Escondido's vicinity, and the nearest is the Elsinore Fault, located approximately 20 miles northeast of the site. This fault is not considered a serious threat due to the distance and magnitude of past seismic activity. However, an earthquake large enough to result in moderate ground shaking is possible. Seismic risks are significantly higher in areas closer to the region's major faults, and a moderate or major earthquake could result in potentially damaging ground shaking (City of Escondido, 2012). Impacts to the project would be precluded through adherence to requirements specified in the Alquist-Priolo Act, the Uniform Building Code, Title 24 of the California Building Code, and all development regulations of the City.

Compliance with these building standards would reduce impacts to below levels of significance associated with seismic hazards.

According to the Escondido General Plan EIR, the project site is located outside areas subject to liquefaction hazards or landslides (Escondido General Plan EIR, Figures 4.6-3 and 4.6-4). Due to the dense underlying formational soils throughout the site and surrounding area, the potential for soil liquefaction occurring at the site is considered to be low. Erosion and sedimentation impacts would be addressed through conformance with the NPDES *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit, State Water Resources Control Board [SWRCB]). Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with NPDES/City storm water requirements, potential erosion and sedimentation impacts from a proposed project would be avoided. Adherence to the City's grading and erosion control measures would ensure implementation of appropriate measures during grading and construction activities to reduce soil erosion impacts to below levels of significance.

e) **No Impact.** The project would not require the installation of a septic system. The project sewer lines would connect to the existing system along Hidden Trails Rod and E. Valley Parkway. Soils affected by the installation of a septic system will not be part of project development and therefore, no impact would occur.

f) **Less than Significant with Mitigation**. Geologically, the project is mainly characterized as the Cretaceous Granite of Dixon Lake (Kdl). However, the lower elevated northwestern corner of the of the property is mapped as Pleistocene older alluvial flood plain deposits (Qoa) (Kennedy 1999). According to the City of Escondido General Plan EIR, these geologic rock formations have a moderate potential for the occurrence of sensitive paleontological resources. The potential for encountering paleontological resources is moderate if construction-related excavations, trenching, or other forms of ground disturbance exceed 10 feet below the surface. Therefore, ground-disturbing land development as a result of the proposed project would have the potential to significantly impact paleontological resources. However, compliance with the following mitigation measures would reduce these impacts to a level below significant.

Paleo-1: If construction-related excavations, trenching, or other forms of ground disturbance are required 10.0 feet or more below the surface, a paleontological monitor shall be present on the project site during ground-disturbing activities. The paleontological monitor shall be equipped to salvage fossils as they are

unearthed, to avoid construction delays, and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.

Paleo-2: If unanticipated paleontological resources are encountered during ground-disturbing activities:

- All work within 50 feet shall halt, until the discovery can be evaluated by a qualified paleontologist.
- The monitor shall determine whether the findings are significant and whether additional work, including recovery and preservation of the find, is warranted.

VIII. GREENHOUSE GAS EMISSIONS

In order to determine the potential effects of a project on greenhouse gas emission (GHG), 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?

a, b) **Less Than Significant**. The following analysis is based on the Air Quality & Greenhouse Gas Report prepared for the project (SRA 2020). In December 2013, the City of Escondido adopted its Greenhouse Gas Emissions Adopted CEQA Thresholds and Screening Tables (City of Escondido 2013). According to the thresholds, a project must demonstrate consistency with the City's Climate Action Plan, which includes reducing 26,807 MTCO2e per year from new development by 2020 as compared to unmitigated conditions. In their threshold's guidance, the City adopted a screening threshold of 2,500 MTCO2e per year to define small projects that are considered less than significant. For projects with GHG emissions above 2,500 MTCO2e per year, the City adopted Screening Tables with GHG reduction measures, which are assigned point values based on the anticipated amount of GHG emission reductions that would be achieved. Projects would be required to demonstrate that they would achieve 100 total points from GHG emission reduction measures to demonstrate compliance with the CAP and less than significant impacts.

Emissions of criteria pollutants and GHGs were calculated for the proposed project. As shown in Table 2, the emissions of both criteria pollutants and GHGs are below the City's screening thresholds. The project would, therefore, not result in a significant impact associated with greenhouse gases.

Table 2 Summary of Estimated Operational Greenhouse Gas Emissions				
Emission Source	**Annual Emissions (Metric Tons per Year)**			
	CO_2	**CH_4**	**N_2O**	**CO2e**
	Operational Emissions			
Area Sources	1	0.0001	0.0000	1
Energy Use	111	0.0038	0.0013	112
Water Use	23	0.1333	0.0033	27
Solid Waste management	7	0.4269	0.0000	18
Vehicle Emissions	240	0.0127	0.0000	240
Amortized Construction Emissions	15	0.0000	0.0000	22
Total	**397**	**0.05768**	**0.0046**	**413**
Global Warming Potential Factor	**1**	**25**	**298**	
CO_2 Equivalent Emissions	**397**	**15**	**1**	**413**

Source: SRA 2020

IX. HAZARDS AND HAZARDOUS MATERIALS

The effects of a project on hazards and hazardous materials are considered to be significant if the proposed project would:

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 safety hazard 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.*

a–c) **Less than Significant**. Due to the nature of the proposed assisted living facility, the project would not result in any associated impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances or wastes. Use and/or storage of hazardous materials at the project site are expected to be minimal and typical of assisted living facilities, and therefore, would not constitute a level that would be subject to regulation. Construction of the project would involve the use of common, but potentially hazardous materials, including vehicle fuels, paints, cleaning materials, and caustic construction compounds. The transport and handling of these materials would occur in accordance with California Occupational Safety and Health Administration (Cal OSHA) guidelines. Further, such materials would be disposed of in accordance with California Department of Toxic Substance Control (DTSC) and County Regulations. Compliance with applicable OSHA, Cal OSHA and DTSC regulations for the handling of hazardous materials and any spill cleanup procedures (in the event of any accidental spill) would prevent significant hazards to the public and the environment. Therefore, potential impacts would be considered less than significant.

d) **No Impact.** The site was evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database (DTSC 2015a) which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites, and the California State Waterboard's Geotracker (DTSC 2015b), which lists LUFT sites. A LUFT site is an undergoing cleanup due to an unauthorized release from an underground storage tank system. According to the EnviroStor and Geotracker database, there are no listings for the project site. Any development of the project site would be required to comply with all applicable Fire, Building, and Health and Safety Codes, which would eliminate any potential risk of upset. The site is not located within a 100-year floodplain (FEMA 2018). Therefore, the

project will not create a significant risk of upset or hazard to human health and safety.

e,f) **No Impact**. The nearest airport to the project site is the McClellan Palomar Airport, in Carlsbad, California, which is more than 12 miles to the west. Therefore, the project site is not within an airport overlay zone and no safety hazard impacts are associated with the proposed project. The project also is not located within the vicinity of a private airstrip and would not result in a safety hazard for people residing or working in the project area. Therefore, the project would not result in any associated impacts related to safety hazards for people residing or working in the project area.

The project does not include activities or structures that would impair implementation of, or physically interfere with, an emergency response plan, or result in the closure or any roadways. The proposed development is not expected to result in the need for additional emergency and fire facilities. Any development of the site would be required to comply with all applicable Fire, Building, and Health and Safety Codes.

g) **Less than Significant**. The subject site is located within a High Fire Hazard Zone as indicated on the Wildfire Risk Map for Escondido and Escondido General Plan Community Protection Element (Figure VI-6; City of Escondido 2012). The property is located in proximity to native habitat areas to the east and undeveloped wildland areas further north, which may contain flammable vegetation such as chaparral, sage scrub and woodland areas. Appropriate enhanced construction for the building would be required, as determined by the Fire Department during review of the building plans. The proposed project would be consistent with Fire Protection Policies 2.14 – 2.17, which specifically pertain to wildland fire. These policies require site design, management practices, removal of overgrown vegetation and fire-resistant landscaping to prevent wildfire. Implementation of these measures would reduce potential risks associated with wildland fires to a less than significant level.

X. HYDROLOGY AND WATER QUALITY

The effects of a project on hydrology and water quality are considered to be significant if the proposed project would:

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/increased erosion or siltation on- or off-site;

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

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

   (iv) Impede or redirect flood flows?

d. *In flood hazard, tsunami, or seich 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?*

a-c) **Less Than Significant Impact**. Th project is located on a northwestern facing slope located at the base of the foothills known as the Barren Hills. Elevations within the project area range from approximately 820 feet AMSL within the steep eastern section of the property to approximately 730 feet AMSL within the northwest corner. The existing drainage pattern sheet flows northerly into an existing storm drain system located on Hidden Valley Road and westerly into an existing storm drain system located in Old Guejito Grade Road, with an average slope of 16%. The site ultimately drains into Escondido Creek via an existing storm drain system. There are three drainage basins consisting of both on-and-offsite areas that sheet flow through the site from the southeast side of the site in northwesterly directions. Based on the Preliminary Drainage report prepared for the project (Masson & Associates 2019), the existing drainage runoff quantity is 8.9 cfs. With project development, the runoff quantity would increase by 3.3 cfs to 12.2 cfs. The runoff from the project would be minimized through the use of water quality and hydromodification BMPs. Runoff from the site will be directed to three different bio-retention basins. The first bio-retention basin would include underground R-tanks located along the west and northwest side of the project

site. The bio-retention basin would include an impermeable liner to prevent infiltration. The basin would include a flow control device to allow for a measured release to meet hydromodification requirements and to reduce increased runoff. The second bio-retention basin would be located in the northeastern portion of the site and the third standard bio-retention basin would be located in the southwest corner. The detention of tributary stormwater would have the beneficial side effect of helping to reduce the peak rate of flow discharging from the site to below existing conditions. All three basins satisfies all required area and volume quantities for hydromodification, water quality treatment and 100 year flood attenuation. These improvements would serve to reduce project drainage impacts to below a level of significance.

The proposed project would comply with the Escondido Grading and Erosion Control Ordinance (Article 55 of the Escondido Municipal Code) which establishes grading and erosion control regulations. Any potential project-related impacts from construction activities would be avoided or reduced below a level of significance through conformance with existing NPDES, City storm water standards and storm water design requirements (SUSMP). The site would be paved or landscaped so that exposed soils would not occur on the site. Post development design and permanent BMPs would ensure operational impacts (storm water and non-storm water runoff) from the project would have less than significant impacts to downstream receiving waters.

The project site is located outside the 100-year flood zone with no associated mapped 100-year floodplains occurring locally in the SanGIS database or on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs). Therefore, no structures would impede or redirect flood flows.

d) **No Impact**. With regard to risks due to dam or levee failure, the project is located within the Lake Wohlford and Lake Dixon Dam Inundation Areas (Escondido General Plan EIR, Figure 4.9-2). However, the proposed land use (assisted living facility) is not expected to contain pollutants that could be released in the event of an inundation due to dam failure. With regard to tsunami risk, the City is not located within a mapped tsunami inundation area. Given the project site's inland location, the risk release of pollutants associated with seiche and tsunami events would be negligible.

e) **No Impact**. Water service to the site currently is provided by the City of Escondido and the project would not withdraw groundwater or otherwise substantially interfere with long-term groundwater recharge or the groundwater table level. Therefore, the proposed project would not result in any significant impacts to hydrology or water quality; result in a significant increase in runoff

from the site; or adversely impacts surface water beneficial uses, water quality objectives, or 303(d) impaired water listings.

The Groundwater Management Plan (GMP) for the San Pasqual Valley groundwater basin is an adaptive management plan for the basin. The GMP only applies to the land within the jurisdiction of the city of San Diego; therefore, development within the City of Escondido would not be subject to this plan. For this reason, the project would not conflict with or obstruct implementation of a sustainable groundwater management plan.

XI. LAND USE AND PLANNING

The effects of a project on existing or planned land uses are considered significant if the proposed project would:

a. *Physically divide an established community?*
b. *Cause a significant environmental impact due to a conflict with land-use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

a) **No Impact.** The proposed project is adjacent to single-family residential development to the south and west; public school and park to the north, and single-family residential and agricultural uses to the east. Existing access to the site is provided East Valley Parkway, Hidden Valley Road and Old Guejito Road. The project would not result in the permanent closure of any streets or sidewalks or the separation of uses and/or disruption of access between land use types. The project's construction (on-site grading of the existing lot and the development of the assisted living residential uses) would not create any new land use barriers nor preclude the development of surrounding parcels. Adequate public facilities are available including water. Therefore, no impact would occur with the project as it relates to impacts to an established community.

b) **No Impact.** The project would not require an amendment to the General Plan to accommodate a change in land use and zoning. The project would introduce land uses that are generally compatible with the surrounding land uses, including uses directly adjacent to the west and north, which are single family residential uses. The project implements General Plan policies that require sound design standards while supporting the establishment of defined uses that are compatible with surrounding uses. Therefore, no significant land use compatibility impacts would occur with the project. Potential visual impacts are

discussed in Section 1, Aesthetics, which were determined to be less than significant. Therefore, no detrimental land-use policy impacts would result from the proposed project.

XII. MINERAL RESOURCES

The effects of a project on mineral resources are considered to be significant if the proposed project would:

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?*

a, b) **No Impact**. The areas surrounding the City's urban core are designated MRZ-3 (Escondido General Plan FEIR 2012). These areas contain known mineral deposits that could qualify as mineral resources, but further exploration is needed to determine if they contain mineral resources of value. However, it is unknown if the areas designated MRZ-3 contain mineral resources of value. No mineral extraction facilities currently exist in the vicinity of the project site or are identified in the General Plan (2012). The site is adjacent to residential uses, parks and schools, which are considered incompatible with mineral extraction facilities. Due to surrounding land uses, the project site would not be a feasible site for exploration of mineral resources. Therefore, construction of the project would not result in the loss of availability of a known mineral resource.

XIII. NOISE

The effects of a project on noise are considered to be significant if the proposed project would 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?*

a) **Less Than Significant Impact.** The following analysis is based on the Noise Report prepared for the project (Eilar Associates 2019). Long-term noise monitoring was conducted near the rear portion of the proposed building on the project site, approximately 430 feet and 280 feet from the centerlines of East Valley Parkway and Hidden Trails Road, respectively. The ambient noise levels on the project site ranged from 42.6 dBA at nighttime and 55.0 dBA during am peak hours.

According to the operational noise impacts calculated in the noise report, the project is not expected to generate a substantial permanent increase in ambient noise levels in the vicinity of the project site. A substantial increase would be considered an increase of three decibels or more, which would represent a doubling of sound energy. In order to demonstrate this fact, minimum measured ambient noise levels were compared to the calculated noise impacts of the rooftop equipment. demonstrated in Table 3, the increase in ambient noise levels is not expected to exceed the three-decibel threshold of significance, and therefore, this impact is considered to be less than significant.

Table 3
Operational Noise Impacts Compared to Minimum Ambient Noise Levels

Receiver	Description	Noise Level (dBA)			
		Minimum Existing Ambient	Operational Noise Impacts	Ambient + Operational	Increase
R1	North Property line	42.6	28.2	42.8	0.2
R2	South property line	42.6	41.5	45.1	2.5
R3	East property line	42.6	34.4	43.2	0.6
R4	West property line	42.6	25.7	42.7	0.1

Source: Eilar & Associates 2019

The proposed project is anticipated to generate approximately 253 ADT on surrounding roadways. As the project does not exceed the thresholds above which a detailed traffic impact analysis would be prepared, the distribution of these trips on surrounding roadways has not been determined. For this reason, for a worst-case analysis of project-generated traffic noise, the anticipated project traffic was added to each surrounding roadway's existing traffic volume to determine the anticipated increase in noise levels along each roadway resulting from the addition of project traffic. Based on the minimal amount of traffic generated by the project, the increase in noise levels on surrounding roadways would be below the three-decibel threshold of significance. Project-generated traffic noise levels are considered to be less than significant.

Estimated construction noise impacts were calculated assuming the typical stages and pieces of equipment. Average hourly noise levels were determined to remain at or below 75 dBA at the nearest noise sensitive property lines. Other noise-sensitive properties are located at a greater distance from on-site activity and therefore would be exposed to lesser noise levels. Noise from temporary construction is expected be less than significant considering the anticipated construction schedule and assuming that equipment is maintained in proper operating condition and using appropriate mufflers. Noise impacts from anticipated construction activity are expected to remain at or below the 75 dBA construction noise limit set by the City of Escondido. It is also unlikely that noise from temporary construction activity would cause a significant increase in ambient noise levels at actual sensitive receiver locations beyond property lines, due to high levels of traffic noise from Valley Parkway. Additionally, no construction activity would take place during the more sensitive nighttime hours when ambient noise levels tend to be lower, as per City of Escondido requirements. For these reasons, this impact is deemed to be less than significant.

b) **Less Than Significant Impact.** Proposed construction phases for the project are not expected to include any significant vibration-inducing equipment, such as pile driving or heavy soil compaction. As these types of equipment would not be present, excessive levels of groundborne vibration and groundborne levels are not expected to be received by any persons. This impact would be less than significant.

c) **No Impact**. The project site is not located within an airport land use plan nor is it located within two miles of a private airstrip, public airport, or public use airport. Therefore, the proposed project would not expose people residing within the project area to excessive noise levels from such uses.

XIV. POPULATION AND HOUSING

The effects of a project on population and housing are considered to be significant if the proposed project would:

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 housing, necessitating the construction of replacement housing elsewhere?

a-b) **No Impact**. The project would introduce 78 assisted living residential units. The project would be implemented within a previously disturbed site which includes an existing single-family residence. The development of the assisted living facility is generally compatible with the current land use and zoning designation. The project would not induce substantial unplanned population growth. These units would support the City's Regional Share Housing Requirements and the General Plan Housing Policy 1.1 to expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City. The project would result in the removal of one single family residence and replaces the existing use with 78 assisted living units. The project would, therefore, not result in the substantial displacement of existing housing nor necessitate the construction of replacement housing elsewhere.

XV. PUBLIC SERVICES

The effects of a project on public services are considered to be significant if the proposed project would:

a. *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

   i. Fire protection

   ii. Police protection

   iii. Schools

   iv. Parks

   v. Other public facilities?

   a) **No Impact**. The development of the assisted living facility on the existing project site would be consistent with the General Plan land-use designation for the site and would not adversely impact public services. Public utilities currently are available to serve the site within the existing public right-of-way or easements. The new building would create an incremental increase in demand for water, sewer and electricity over existing levels, but the project increase is not significant on an area-wide level and the project would not require a major expansion of existing facilities (see discussion under Section XIX below).

XVI. RECREATION

The effects of a project on recreation are considered to be significant if the proposed project would:

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

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

a-b) **No Impact**. The proposed development would cause an incremental increase in demand on the City's recreational facilities. However, the development fees paid by the developer would offset the anticipated impact on existing facilities. The proposal will not impact the quality or quantity of existing recreational opportunities since no recreational opportunities currently exist on the site. The project site is not listed as a potential park site in the City's Master Plan of Parks and Trails.

XVII. TRANSPORTATION

The effects of a project on transportation and traffic are considered to be significant if the proposed project would:

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

b. Would the project 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?

a-d) **Less Than Significant**. According to the traffic letter report prepared for the project (LLG 2019), the project is expected to add approximately 253 average daily trips (ADT) with 5 inbound / 2 outbound trips during the AM peak hour and 7 inbound / 7 outbound trips during the PM peak hour. Access to the site is

provided from a private driveway along Hidden Valley Road. Per the City's Circulation Element, Valley Parkway is classified as a Prime Arterial, El Norte Parkway is classified as a Major Road, and Hidden Trails Road is classified as a Local Collector. The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Bus service would not be impacted by the proposed project or impact any existing or proposed bicycle facilities in the area as designated on the City's Bicycle Facility Master Plan. Impacts would be less than significant.

Construction Traffic – Temporary traffic impacts would occur during site preparation and construction activities. Due to the nature of the project, additional trips from haul trucks and construction trips would have a minimal short-term impact on the local roadways or intersections. Construction traffic typically occurs during the off-peak hours. Therefore, impacts to LOS during temporary construction would be less than significant.

Design Features/Hazards/Emergency Access. The project does not include any design features or incompatible uses that would substantially increase hazards. The project includes access via a private driveway along Hidden Valley Road and a service road on Old Guejito Road. The project is not expected to increase hazards due to design features or result in inadequate emergency access.

XVIII. TRIBAL CULTURAL RESOURCES

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

a. *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*

b. *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 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.*

a-b) Less than Significant Impact with Mitigation. In accordance with California State Assembly Bill AB 52, the City initiated government to government consultation with four tribes including Rincon Band of Luiseno Indians, the San Luis Rey Band of Mission Indians, Soboba Band of Luiseno Indians, and the Mesa Grande Band of Mission Indians through written notification of the proposed project activities. As required under AB 52, letters were sent to the tribes on May 28, 2019. A response was received from the Rincon Band of Luiseno Indians and the San Luis Rey Band of Mission Indians requesting formal consultation. On July 3, the Rincon Band expressed their agreement in having standard conditions for cultural resources, including archaeological and tribal monitoring during site grading activities to be included as mitigation measures for the project. Formal consultation with the Rincon Band was closed on July 15, 2019.

The San Luis Rey Band of Mission Indians provided a formal request for tribal consultation under the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21080.3.1 subdivisions (b), (d) and (e)) for the mitigation of potential project impacts to tribal cultural resource for the proposed project. Consultation with the San Luis Rey Band is ongoing.

Implementation of following mitigation measures CUL-1 through CUl-10 will be required as mitigation to reduce to a less-than significant level potential impacts to any tribal cultural resources. All tribal correspondence is available for review in the Planning Division project file.

Mitigation Measures:

TCR-1: The City of Escondido Planning Division ("City") recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between them. Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

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

TCR-3: The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

TCR-4: During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring**.**

TCR-5: In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

TCR-6: If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

TCR-7: The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

TCR-8: As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

TCR-9: If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified Archaeologist does not collect the

cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

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

XIX. UTILITIES AND SERVICE SYSTEMS

The effects of a project on utilities and service systems are considered to be significant if the proposed project would:

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?*

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

a–c) **Less than Significant Impact**. The project would be located within an urban setting that has access to water, sewer, electricity and storm water infrastructure. Water and storm water services are provided by the City of Escondido. The proposed development would result in 78 assisted living residential units; thus, it would not be required to conduct a water supply assessment (i.e, project is not a proposed residential development of more than 500 units pursuant to SB 221).

Wastewater treatment service is provided to the project site by the Hale Avenue Resource Recovery Facility (HARRF), which is owned and operated by the City of Escondido. The HARRF is a secondary-treatment wastewater treatment facility with a capacity of 18 million gallons per day (mgd). The HARRF treats raw sewage from the City of Escondido and the Rancho Bernardo community located in the City of San Diego. Wastewater collection and treatment are achieved via a network of lift stations, gravity pipelines, and sanitary sewer mains. The facility operates 24 hours a day, and the average daily flow is 15.6 mgd, generally comprising an estimated 11.8 mgd from Escondido and 3.8 mgd from Rancho Bernardo (Escondido 2019).

Upon connection to the City's sewer infrastructure the project would be required to comply with the wastewater treatment requirements of the San Diego Regional Water Quality Control Board (RWQCB). The project would contribute to a minimal amount of discharge to the HARRF's existing capacity. The project is anticipated to generate 15,600 gallons per day (gpd) of wastewater, which would increase the current wastewater flow at the HARRF by less than 1%.[1] Typical wastewater flows at the HARRF are 15.6 mgd. The project's increase would not exceed the permitted capacity of the HARRF (18.0 mgd). As such, the project would not exceed the wastewater treatment requirements of the City of Escondido or the San Diego RWQCB. Existing wastewater treatment facilities would be adequate to serve the project's wastewater treatment needs.

Further, based on information regarding the project's flow and future expansion of the HARRF to a capacity of 27 mgd, the addition of wastewater from the project would remain well below the HARRF's anticipated capacity. The project would not impede the City's compliance with relevant General Plan policies, including Wastewater System Policy 13.1, regarding regular review and update of the Wastewater Master Plan (last updated in 2014), and Wastewater System Policy 13.2, ensuring that the HARRF and supporting infrastructure would

[1] 15,600 gpd/15,600,000 gpd= .001x100=0.1%

provide sufficient capacity to meet normal and emergency demand for existing and future growth.

Wastewater Facilities

Existing City-maintained wastewater facilities are present in the vicinity of the project site. The existing sewer system consists of a 4-inch sewer line that extends from the northern portion of the site to Hidden Trails Road. Project improvements include the removal of the 4-inch sewer line and replacement with a 6-inch PVC pipe. No additional offsite improvements to the existing wastewater conveyance system would be required.

The project, therefore, would not require the construction or expansion of wastewater facilities, and impacts would be less than significant.

d) **Less than Significant Impact.** Water service is provided to the project site by the City of Escondido Water and Wastewater Division (EWWD), which provides potable water supply and distribution to the proposed project area. The EWWS is a member of the San Diego County Water Authority (SDCWA), the region's wholesale water provider, which in turn is a member of the Metropolitan Water District (MWD) of Southern California. MWD supplies water to approximately 18 million people in a 5,200-square mile service area that includes portions of Ventura, Los Angeles, Orange, San Bernardino, Riverside, and San Diego counties.

EWWD's water supply originates from two sources, local water and imported water from SDCWA. From the San Luis Rey River watershed, local water is stored on a seasonal basis in the Lake Henshaw and Lake Wohlford reservoirs. Local water is delivered by EWWD to the City via the Escondido Canal and associated pipelines. Local water is shared with VID and provides approximately 18 percent of EWWD's average water demand. Some groundwater wells are located throughout the EWWD's service area; however, these wells are privately owned and maintained. EWWD does not participate in any groundwater storage or replenishment programs. The remaining 82 percent of water demand within EWWD's service area is provided by imported water from San Diego County Water Authority (SDCWA). EWWD has two connections to the SDCWA aqueduct system.

The Escondido-Vista Water Treatment Plant (EVWTP) treats raw water for EWWD's service area. EVWTP was constructed in 1976 and has a permitted capacity of 75 million gallons per day (mgd).

According to the City's Urban Water Management Plan, Escondido has a projected water demand of 24,903 AF by 2020 and 25,840 AF by 2030. As indicated, the City anticipates that it will have adequate water supply to serve existing and future customers through 2040 (Escondido 2016). The City supplies approximately 21,862 A per year, or 19.5 mgd of water to its customers.2

Based on the City's water demand rate (800 gpd per equivalent residential unit), the project would demand approximately 62,400 gpd, which represents 0.3% of the identified normal year water supply described above. Consequently, sufficient water supplies are available to serve the project and impacts on water supplies would be less than significant.

In January 2017, the Escondido City Council approved a Conditional Use Permit (CUP) to allow the construction of a microfiltration reverse osmosis treatment facility to be owned and operated by the City. The project involves development of a new city facility to provide advanced treatment for recycled water produced at the City's HARRF for agricultural uses, with the capacity for future treatment for indirect potable reuse. The facility would be sized for a total production capacity of 2 mgd. This facility represents the potential for additional recycled water supplies to be made available for public use, including the proposed project, in the future.

Therefore, sufficient water supplies are available to serve the project from existing entitlements and resources, and no new or expanded entitlements are required. Impacts in this regard would be less than significant.

e) **Less than Significant Impact**. The city's stormwater drainage system operates under San Diego Regional Water Quality Control Board (RWQCB) Order Number R9-2013-0001 (MS4 Permit), as amended by Order Numbers R9-2015-0001 and R9-2015-0100. This permit was issued to manage discharges from municipal separate storm sewer systems (MS4s) in the San Diego region and was adopted on May 8, 2013, replacing the 2007 Municipal Stormwater Permit (R9-2007-0001). The 2013 MS4 Permit applies to all 21 municipal agencies in San Diego County, including the City of Escondido (Escondido 2015).

All on-site runoff flows in a northerly and easterly direction toward an existing 18" inlet within Hidden Valley Road. A stormwater system has been incorporated into the project design as shown in the project grading plan (Figure XX). The stormwater system includes a bioretention/biofiltration facility located on the northwest corner of the site. The private roadway, parking lots and landscaped areas would be directed towards the biofiltration basin with underdrains

2 21,862 AF per year/365 days=59.9 AF per day x325,851 gallons /AF= 19.5 mgd; one acre-foot=325,851.427 gallons

connected to the storm drain system. Construction of the project's stormwater drainage facilities would be located entirely on site. The project would not result in expansion of any existing facilities, or additional off-site facilities; therefore, impacts would be less than significant.

The project would require water use during construction for construction related activities. However, this water use would be temporary in nature and would not generate a substantial amount of stormwater that would require treatment or disposal. Therefore, the project is anticipated to result in less than significant impacts on stormwater drainage facilities during construction.

f) **Less than Significant Impact**. Escondido Disposal, Inc. is responsible for the collection and disposal of solid waste and recyclables from homes, businesses and industries in the proposed project area. Residential collection of solid waste by Escondido Disposal is transferred to the Escondido Disposal Transfer Station where it is then taken to either the Sycamore or Otay Mesa Landfill. The Escondido Disposal Transfer Station is a 59,000-square- foot, covered, concrete floor space that is operated by Escondido Disposal and has an annual permitted throughput of 902,500 tons. There are no other solid waste disposal or handling facilities within the proposed project area. The Otay and Sycamore landfills, which serve the proposed project area, are located outside of the planning area boundary and are owned and operated by a private company, Allied Waste Industries. The Otay landfill is located in the City of Chula Vista, south of the proposed project area, while the Sycamore landfill is located in the City of Santee, also south of the proposed project area. In addition to solid waste disposal services provided by Escondido Disposal, the City of Escondido Recycling & Waste Reduction Division operates a Recycling Hotline, promotes recycling through presentations in area schools, offers workshops on vermiculture, maintains the Household Hazardous Waste Program, contracts trash collection services with Escondido Disposal, and promotes citywide cleanup events.

Information from CalRecycle's Disposal Rates Detail for residents (5.2 pounds per day) in Escondido was used to calculate the amount of solid waste potentially generated by the proposed project (CalReycle 2018). According to the projected number of residents and staff, the project is anticipated to generate an estimated population of 149 persons.

Based on the city's residential waste disposal rates and the project's estimated number of residents, approximately 141 tons of solid waste would be generated

by the project per year at project buildout. [3] All solid waste generated by the project would be disposed of at one of the landfills used for collecting solid waste generated in the city.

Sycamore Canyon Landfill accepted the majority of the city's solid waste (98.1 percent). The Sycamore Landfill has a maximum permitted daily throughput of 5,000 tons and a maximum permitted capacity of 39,608,998 cubic yards. The project is estimated to produce 141 tons per year of solid waste. This amount would not substantially increase the daily throughput beyond the permitted levels of the Sycamore Landfill.

As discussed in Section 4.18(f) above, the project would not result in a substantial permanent increase in solid waste generation or a significant change in the characteristics of solid waste generated at the site. Construction waste would include one-time disposal of material that cannot be recycled or reused. Where possible, appropriate measures would be undertaken to recycle or reuse solid waste generated during project construction. Solid waste generated by the project would be disposed of in compliance with the requirements for construction waste management mandated by the City of Escondido Municipal Code. Therefore, the project would not conflict with federal, state, and local statutes and regulations related to solid waste and no impacts would occur.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

b. *Due to slope, prevailing winds, and other factors, exacerbate wildlfire risks, and thereby expose project occupants to, pollutant concentrations from a wild fire 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?*

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3 Annual solid waste: 149 persons x 5.2 lbs per day per person of solid waste x 365 days = 282,802 lbs per year/2,000 lbs = 141 tons per year.

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?*

a-c) **Less than Significant.** The subject site is located within a High Fire Hazard Zone as indicated on the Wildfire Risk Map for Escondido and Escondido General Plan Community Protection Element (Figure VI-6; City of Escondido 2012). The property is located in proximity to native habitat areas to the east and undeveloped wildland areas further north, which may contain flammable vegetation such as chaparral, sage scrub and woodland areas. Appropriate enhanced construction for the building would be required, as determined by the Fire Department during review of the building plans. The proposed project would be consistent with Fire Protection Policies 2.14 – 2.17, which specifically pertain to wildland fire. These policies require site design, management practices, removal of overgrown vegetation and fire-resistant landscaping to prevent wildfire. Implementation of these measures would reduce potential risks associated with wildland fires to a less than significant level.

d) Less than Significant. The project does not include any design features or incompatible uses that would expose people or structures to significant risks, including downslope or downstream flooding or landslides. As previously discussed in Section X, Hydrology and Water Quality, project development would increase runoff by 2.1 cfs to 10.7 cfs. The runoff from the project would be minimized through the use of water quality and hydromodification BMPs. Runoff from the site will be directed to a bio-retention basin and underground R-tanks located along the west and northwest side of the project site. The bio-retention basin will include an impermeable liner to prevent infiltration. The basin will include a flow control device to allow for a measured release to meet hydromodification requirements and to reduce increased runoff. The detention of tributary stormwater would have the beneficial side effect of helping to reduce the peak rate of flow discharging from the site to below existing conditions. These improvements would serve to reduce project drainage impacts to below a level of significance.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

The effects of a project on Tribal Cultural Resources are considered to be significant if the proposed project would:

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

plant or animal community, 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 would cause substantial adverse effects on human beings, either directly or indirectly*?

a-c) **Less Than Significant Impact with Mitigation Measures**:

Potential impacts to the environment as a result of this project are in the areas of Biology, Cultural, Paleontological and Tribal Resources. As mitigated, the project is not expected to have any significant impacts, either long-term or short term, nor would it cause substantial adverse effects on human beings, either directly or indirectly. The project would not degrade the quality of the environment for plant or animal communities, substantially reduce the habitat of a fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, nor reduce the number or restrict the range of endangered plants or animals. The project would not eliminate important examples of the major periods of California history or prehistory. As described, the project's impacts would be avoided by incorporation of project design measures, or mitigated to levels below significance, and no cumulatively considerable impacts would occur. Therefore, the proposed project would not have a significant individual or cumulative impact on the environment.

Summary of Mitigation Measures:

Biological Resources

Bio-1: Per City Municipal Code (Sec. 33-1069, Vegetation Protection and Replacement Standards), sensitive biological habitat that is removed shall be mitigated either on site or off site by the planting of the same habitat species at a minimum ratio of one to one (1:1). If replacement of sensitive biological species and/or habitat is not feasible on or off site, other equivalent mitigation measures may be considered by the director.

Prior to issuance of the grading permit, the applicant will mitigate for impacts to sensitive biological habitats (coast live oak woodland and Diegan coastal sage scrub-disturbed) through purchase of credits for 0.04 acre at the City of Escondido Daley Ranch Conservation Bank or another approved habitat mitigation bank.

Bio-2: Mitigation for the loss of mature and protected trees shall be conducted per City Municipal Code Sec. 33-1069 (Vegetation Protection and Replacement Standards) in coordination with the City. If mature trees cannot be preserved on-site, they shall be replaced at a minimum one to one (1:1) ratio. The preferred replacement is a tree(s) of equal size and caliper. Protected trees shall be replaced at a minimum two to one (2:1) ratio. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the director, based on the specific circumstances of each request, the characteristics and condition (size, age, and location) of the individual trees involved, and any professional report.

If any required replacement trees cannot be planted on-site, the applicant or owner shall coordinate with the City of Escondido Public Works Department and Planning Division to arrange for the planting of trees within one or more Landscape Maintenance Districts. The applicant will replace 10 oak trees onsite. The applicant or owner shall be responsible for the planting of the remaining 20 off-site replacement trees, and shall be responsible for maintaining said trees for an establishment period of at least twenty-four (24) months. If one or more Landscape Maintenance Districts are not available to accommodate the trees, a City-owned park or open space area may substitute, at the discretion of Public Works and Planning. If the Landscape Maintenance District, park, or open space area is not irrigated, the applicant or owner shall be responsible for watering the off-site replacement trees during the 24-month establishment period.

Bio-3: To ensure that MBTA-regulated species' nesting activities are not impacted, a pre-construction general nesting bird survey will be conducted within all potential nesting habitat (in this case, shrub- and tree-associated vegetation on site) that may be impacted by active construction during the general avian breeding season (February 1 through August 31). The pre-construction survey will be conducted no more than 7 days prior to initiation of construction. If no active avian nests are identified within the development impact footprint area or within a 300-foot buffer of the proposed development project area (as feasible), no further mitigation is necessary. If active nests of avian species regulated by the MBTA are detected within the proposed development footprint or within a 300-foot

buffer, construction will be halted until the young have fledged, until a qualified biologist has determined the nest is inactive, or until appropriate mitigation measures that respond to the specific situation have been developed and implemented in consultation with the regulatory agencies. The results of the survey will be provided in a report to the Director, City of Escondido Planning Department, for concurrence with the conclusions and recommendations.

Paleontological Resources:

Paleo-1: If construction-related excavations, trenching, or other forms of ground disturbance are required 10.0 feet or more below the surface, a paleontological monitor shall be present on the project site during ground-disturbing activities. The paleontological monitor shall be equipped to salvage fossils as they are unearthed, to avoid construction delays, and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.

Paleo-2: If unanticipated paleontological resources are encountered during ground-disturbing activities:

- All work within 50 feet shall halt, until the discovery can be evaluated by a qualified paleontologist.
- The monitor shall determine whether the findings are significant and whether additional work, including recovery and preservation of the find, is warranted.

Tribal Cultural Resources:

TCR-1: The City of Escondido Planning Division ("City") recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between them. Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies,

excavations, geotechnical investigations, grading, and all other ground disturbing activities.

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

TCR-3: The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

TCR-4: During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring**.**

TCR-5: In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor, shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

TCR-6: If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and

disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

TCR-7: The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

TCR-8: As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

TCR-9: If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified Archaeologist does not collect the cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

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

REFERENCES

Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents listed below are hereby incorporated by reference. The pertinent material is summarized throughout this MND where that information is relevant to the analysis of impacts of the Project. The following references were used in the preparation of this MND and are available for review at the Planning Department, located at 201 North Broadway, Escondido, CA.

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