



**Addendum No. 5 to the Escondido General Plan
Update, Downtown Specific Plan Update, and
Climate Action Plan Final Environmental Impact
Report (SCH #2010071064)
Escondido, California**

Prepared for
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ATTACHMENTS (Under Separate Cover)

1:	Air Quality Analysis, RECON Environmental, Inc.
2:	Local Mobility Analysis, RICK Engineering Company
3:	Geotechnical Investigation, Christian Wheeler Engineering
4:	Climate Action Plan Checklist, RECON Environmental, Inc.
5:	Storm Water Quality Management Plan, RICK Engineering Company
6:	Drainage Study, RICK Engineering Company
7:	Noise Analysis, RECON Environmental, Inc.
8:	Will Serve Letter, City of Escondido

1.0 Introduction

This document is Addendum No. 5 to the Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Final Environmental Impact Report Project (State Clearinghouse [SCH] No. 2010071064) (referred to hereafter as the "Final EIR"). This Addendum has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 15164.

1.1 Project Background

On May 23, 2012, the City of Escondido (City) adopted the Final EIR for the implementation of an update to the existing General Plan, including the Housing Element (General Plan Update), an update to the existing Downtown Specific Plan (Downtown Specific Plan Update) and creation and implementation of an Escondido Climate Action Plan (E-CAP) (Approved Project). A Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations regarding the Final EIR were also adopted at the same public hearing. Following the adoption of the Final EIR, the City adopted four addendums to the Final EIR:

1. Addendum No. 1 was adopted on May 8, 2019, and consisted of amending the Downtown Specific Plan to include a Density Transfer Program. The Density Transfer Program allows residential densities to be exceeded on a case-by-case basis through a density transfer process subject to approval of a Planned Development Permit and Development Agreement (or other agreement approved by the City), filed concurrently with all other necessary land development permit requests. The Density Transfer Program consists of the sale or transfer of one parcel's development rights of dwelling units to another parcel, which allows more residential development on the second parcel while reducing or preventing development on the originating parcel. Overall density within the Downtown Specific Plan cannot exceed the maximum buildout of 5,275 residential units. The Density Transfer Program requires a deed restriction to be recorded on the Sending Area property to demonstrate that the development rights are severed from the lot designated as a Sending Area. No "fractional" units may be severed or re-allocated. Residential density may be transferred as "whole" numbers from Sending Areas in the Downtown Specific Plan to Receiving Areas in the Downtown Specific Plan. The mechanism to sever dwelling units from a Sending Area and/or allocate units to a Receiving Area is through a Density Credit Pool, managed by the Planning Division.
2. Addendum No. 2 was adopted on August 11, 2021, and consisted of a map amendment to Figure II-4 of the Downtown Specific Plan to eliminate the ground-floor retail requirement in areas where standalone residential uses would not be detrimental to the surrounding commercial districts and goals of the Downtown Specific Plan.
3. Addendum No. 3 was adopted on March 22, 2023, and consisted of a General Plan amendment to update the City's Housing Element for the 6th Cycle planning period from April 15, 2021, to April 15, 2029, and a General Plan text amendment to update the Community Health and Services Chapter.

4. Addendum No. 4 was adopted on October 1, 2025, and consisted of a General Plan Amendment to update the Community Protection Chapter; and the addition of an Environmental Justice section to the Community Health and Services chapter.

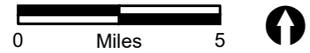
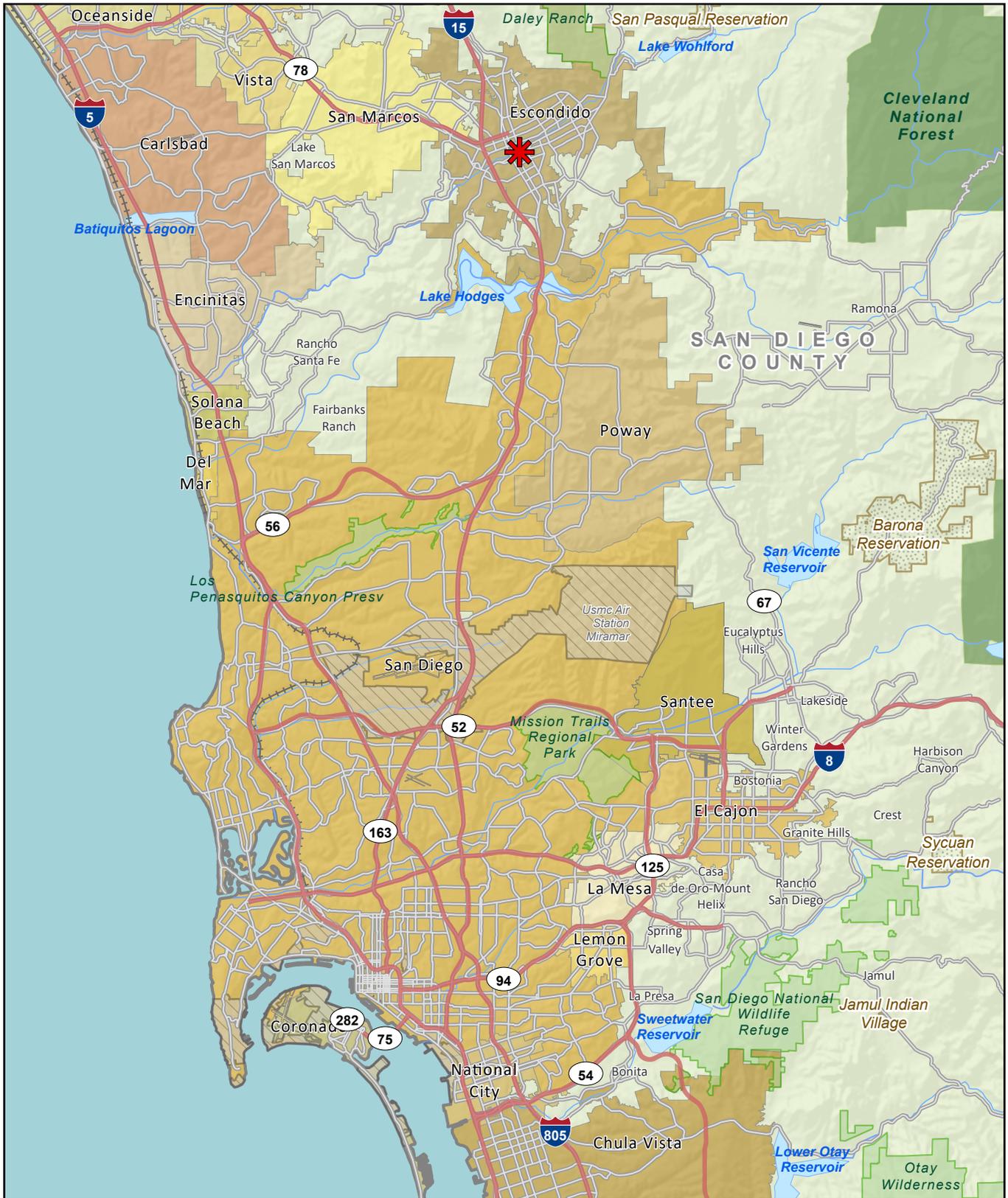
Addendum No. 5 includes a Design Review Permit and a Planned Development Permit for the construction of a five-story, 128-unit multi-family building on a 1.04-acre project site located at 137 West Valley Parkway (Accessor's Parcel Number [APN] 229-421-26-00). Addendum No. 5 also includes a Specific Plan Amendment (SPA) to the Downtown Specific Plan to remove the ground-floor retail component and to increase the allowed building height from 60 feet to 65 feet and from four stories to five stories for APN 229-421-26-00. In addition, Addendum No. 5 includes a Development Agreement in tandem with the Planned Development Permit to access the Density Credit Pool, to pay an in-lieu fee to reduce the required open space, and to demonstrate consistency with the Climate Action Plan (CAP) checklist as it relates to the number of required trees. These proposed actions are together referred to hereafter as the "Modified Project." Figure 1 identifies the regional location and Figure 2 identifies the Approved and Modified Project locations on an aerial photograph.

1.2 Approved Project

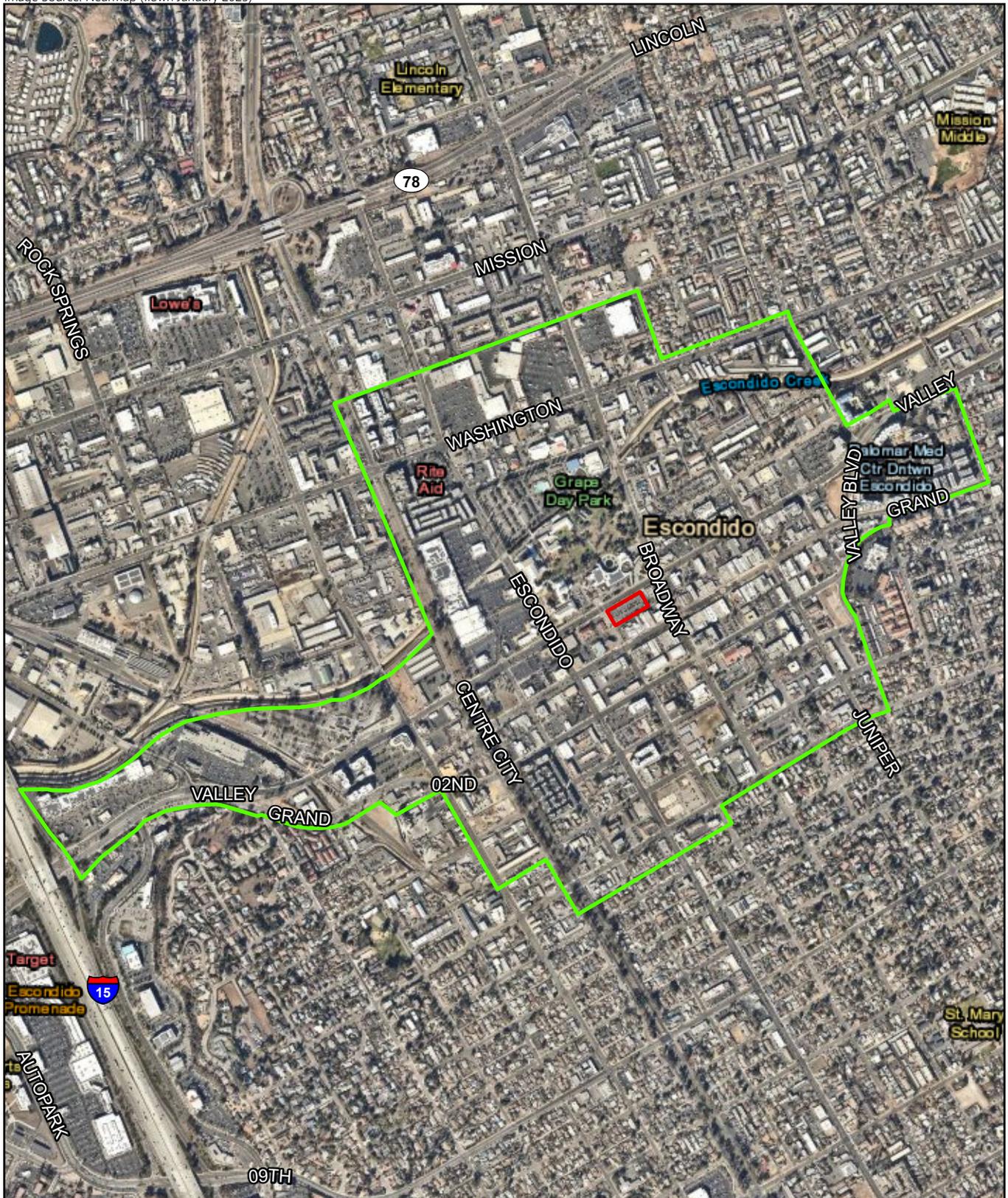
The Final EIR analyzed environmental impacts associated with the General Plan Update, Downtown Specific Plan Update, and E-CAP. The General Plan Update consisted of a statement of long-range public policy to guide the use of private and public lands within the City, the City's Sphere of Influence (SOI) and some areas adjacent to the City's SOI. The Downtown Specific Plan Update provided a comprehensive plan for land use, development regulations, development incentives, design guidelines and other related actions aimed at implementing the strategic goals for the downtown area as set forth in the General Plan goals and policies. The E-CAP established goals and policies to reduce greenhouse gas (GHG) emissions by incorporating environmental responsibility into the City's daily management of residential, commercial and industrial growth, education, energy and water use, air quality, transportation, waste reduction, economic development, and open space and natural habitats. The Final EIR was structured to serve as a tiering document for future development projects within the City pursuant to the requirements of CEQA.

1.3 Purpose of Addendum

Addendum No. 5 addresses changes to the Approved Project associated with the Modified Project as discussed in greater detail in Section 2. The Final EIR and Addendum No. 5, along with the other documents incorporated by reference herein, serve as environmental review of the Modified Project, as required pursuant to the provisions of CEQA, the CEQA Guidelines, and 14 California Code of Regulations Section 15164 et seq. The environmental analysis in this Addendum, and all feasible mitigation measures identified in the Final EIR, shall be incorporated into the resolutions approving the Modified Project.



 Project Location



- ▭ Modified Project
- ▭ Downtown Specific Plan Update (Approved Project)



FIGURE 2
Project Location on Aerial Photograph

1.4 Basis for Addendum

Section 15164 (a) of the CEQA Guidelines states, "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent Environmental Impact Report (EIR) have occurred." Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR or Negative Declaration may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

1. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - a. Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - b. Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - i. The project would have one or more significant effects not discussed in the previous EIR or negative declaration;
 - ii. Significant effects previously examined would be substantially more severe than shown in the previous EIR;
 - iii. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

2. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
3. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

The lead agency has assessed the proposed modifications in light of the requirements defined under Section 15162 of the CEQA Guidelines. As discussed in this Addendum, none of the conditions requiring preparation of a subsequent negative declaration under Section 15162 of the CEQA Guidelines are satisfied.

1.5 Evaluation of Environmental Impacts

The responses to each of the Environmental Checklist questions addressed in this Addendum use CEQA terminology as specified below.

Reduced Impact. The impacts of the Modified Project would be less than those of the original Approved Project.

No New Impact/No Impact. The Modified Project would result in no impact or no new impact compared to the original Approved Project.

New Mitigation Required. The Modified Project would result in a new or substantially greater impact compared to the original Approved Project and new mitigation would be required to reduce the impact to a less than significant level, resulting in a Subsequent EIR or Mitigated Negative Declaration (MND).

New Potentially Significant Impact. The Modified Project would result in a new impact or substantially greater impact compared to the original Approved Project. A subsequent MND or EIR would be required.

2.0 Modified Project

1. Project Name:

Kingsbarn Escondido Project (Modified Project)

2. Lead Agency:

City of Escondido
Development Services Department, Planning Division
201 North Broadway
Escondido, CA 92025

3. Contact Person and Phone Number:

Ivan Flores, AICP
Principal Planner
760-839-4529
Ivan.Flores@escondido.gov

4. Project Location:

137 West Valley Parkway, Escondido, CA
APN: 229-421-26-00

5. Project Applicant/Sponsor:

Kingsbarn Realty Capital
2500 Sand Hill Road, Suite 320
Menlo Park, CA 94025

6. General Plan Designation:

Downtown Specific Plan (SPA 9)

7. Zoning:

Specific Plan Area (S-P)

8. Surrounding Land Use(s) and Project Setting:

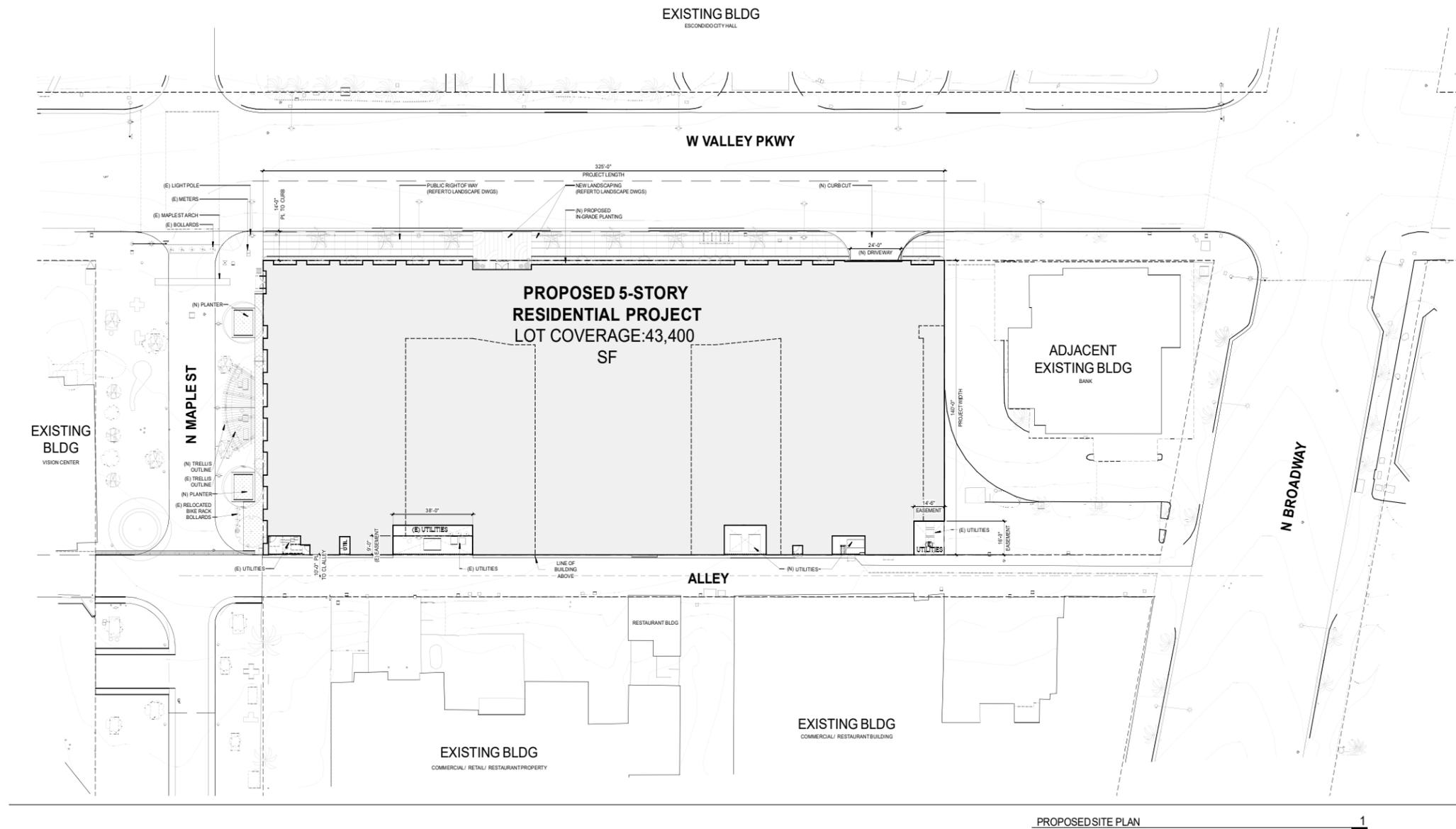
The 1.04-acre Modified Project site is developed with a public parking lot. Surrounding land uses include West Valley Parkway followed by Escondido City Hall to the north and northwest, commercial uses to the east, northeast, and southwest, John Paul the Great Catholic University to the south, and the Civic Center to the west.

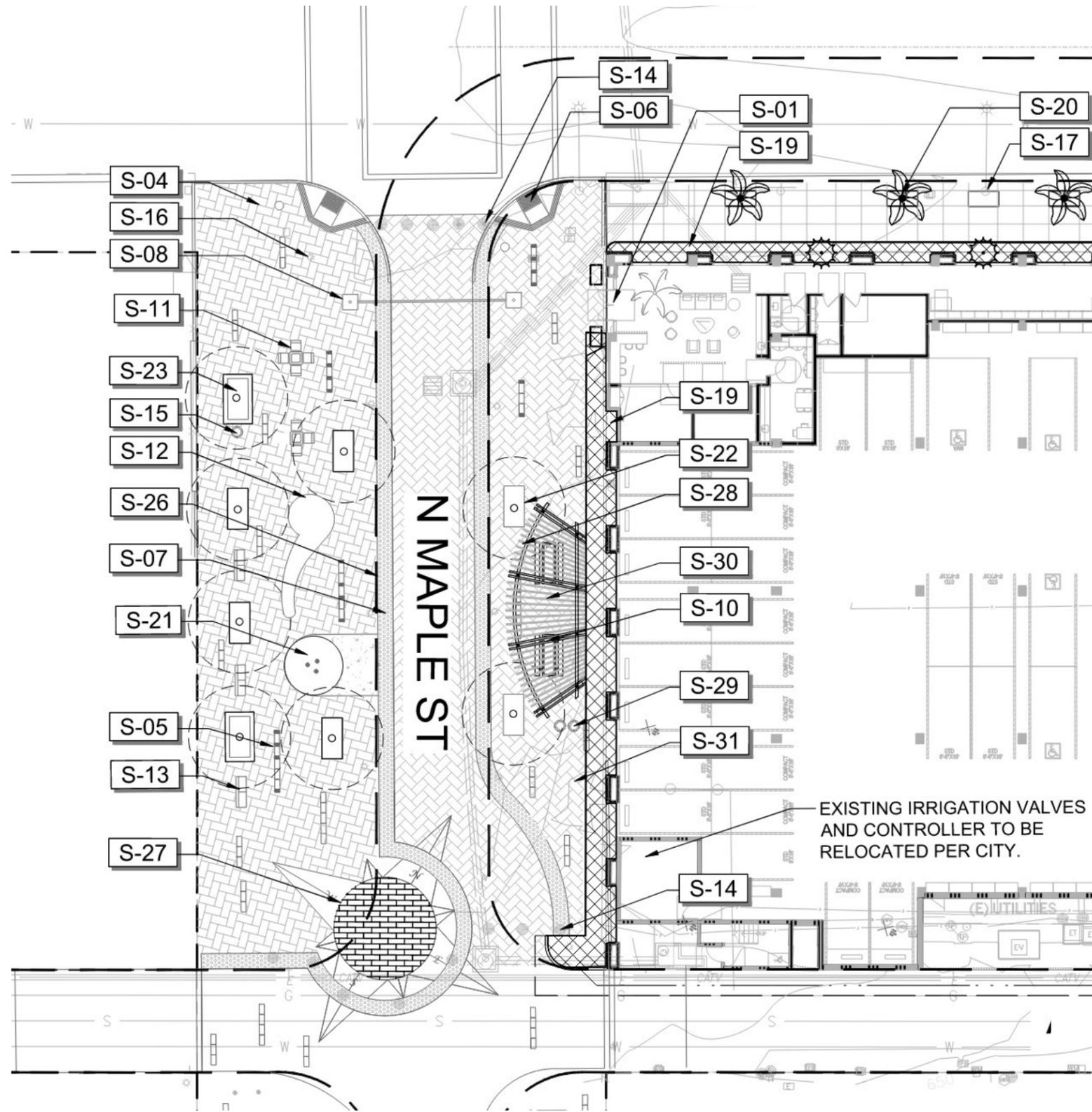
9. Modified Project Description:

The Modified Project would consist of a SPA to the Downtown Specific Plan to remove the ground-floor retail component and increase the allowed building height from 60 feet to 65 feet and the number of stories from four to five. Additionally, the Modified Project includes a Development Agreement and Planned Development Permit to utilize the City's Density Transfer Program to transfer 50 units from underutilized sites within the Downtown Specific Plan to the Modified Project site; and to pay an in-lieu fee to demonstrate consistency with the CAP checklist as it pertains to a required number of trees. The Modified Project would also require a Design Review Permit and a Planned Development Permit for the construction of a five-story, 128-unit multi-family residential building and associated recreational areas (Figure 3). The Planned Development Permit also includes a request to reduce the required open space and instead pay an in-lieu fee, as permitted by the Downtown Specific Plan, as well as to allow the use of tandem parking spaces. Grading would involve the excavation of 1,400 cubic yards and construction is anticipated to take approximately 18 months. The 113,384-square-foot building would consist of the following:

- Level one would be 2,980 square feet and consist of 114 parking spaces including five accessible spaces, one van-accessible space, 20 compact spaces, and 88 standard spaces. Of the 114 spaces, 46 would be electric vehicle ready and 11 would be electric vehicle supply equipment spaces. In addition, 22 of the 114 parking spaces would be tandem stalls. Level one would also include eight short-term bicycle parking spaces and eight long-term bicycle parking spaces.
- Level two would be 26,481 square feet and consist of 29 dwelling units and shared community spaces including a pool, barbeque/dining area, lounge, fitness center, co-working area, and lawn and game area.
- Level three would be 26,440 square feet and consist of 33 dwelling units.
- Level four would be 31,043 square feet and consist of 33 dwelling units.
- Level five would be 26,440 square feet and consist of 33 dwelling units.

The Modified Project would also consist of minimal off-site improvements to Maple Street Plaza located directly west of the Modified Project site. Off-site improvements would include replacing the existing tree and planter with traffic rated unit pavers, relocating the existing trellis structure, removing the existing bicycle racks, and removing and capping of the equipment and utility vault supporting the existing fountain and irrigation systems. Off-site improvements would also include installing a five-foot wide in-grade landscape planter along the western boundary of the Modified Project site (Figure 4).





CODE	DESCRIPTION
S-01	ENTRY CONOPY - 6 FT. PROJECTION INTO R.O.W.
S-02	NOT USED
S-03	NOT USED
S-04	EXISTING ENHANCED PAVERS TO REMAIN, TYP.
S-05	EXISTING DECORATIVE CONCRETE INLAY TO REMAIN, TYP.
S-06	EXISTING ACCESSIBLE RAMP TO REMAIN, TYP.
S-07	EXISTING TRUNCATED DOMES TO REMAIN, TYP.
S-08	EXISTING GATEWAY TO REMAIN.
S-09	BIKE RACKS
S-10	PICNIC TABLE WITH BENCHES, TYP.
S-11	EXISTING FURNITURE TO REMAIN, TYP.
S-12	EXISTING SCULPTURAL BENCH TO REMAIN
S-13	EXISTING BENCHES TO REMAIN, TYP.
S-14	EXISTING REMOVABLE BOLLARDS TO REMAIN, TYP.
S-15	EXISTING TRASH RECEPTACLE TO REMAIN
S-16	EXISTING LIGHT TO REMAIN, TYP.
S-17	EXISTING STREETLIGHT TO REMAIN, TYP.
S-18	DECORATIVE PLANTER POT, TYP.
S-19	PLANTING AREA, TYP.
S-20	PARKWAY PALM TREES WITH TREE GRATES.
S-21	EXISTING FOUNTAIN TO REMAIN.
S-22	EXISTING PLANTER TO REMAIN, TYP.
S-23	EXISTING TREE TO REMAIN, TYP.
S-24	EXISTING DRIVEWAY TO REMAIN
S-25	DRIVEWAY ENTRANCE TO PARKING
S-26	FIRE LANE. SEE CIVIL PLANS
S-27	EXISTING TREE AND PLANTER TO BE REMOVED. CURRENT LIMITS TO BE FILLED IN WITH DECORATIVE AND INTERPRETIVE PLAQUE. THIS AREA IS TO BE VEHICULAR RATED FOR FIRE TRUCK LOADING.
S-28	EXISTING PLAZA TRELLIS TO BE RELOCATED
S-29	EXISTING TRASH AND RECYCLING RECEPTACLES TO BE RELOCATED
S-30	EXISTING FURNITURE TO BE REMOVED, INFILL WITH DECORATIVE PAVERS TO MATCH EXISTING
S-31	EXISTING TREE WELL TO BE REMOVED



FIGURE 4
Modified Project Off-site Improvements

3.0 Environmental Determination

The City previously certified the Final EIR and MMRP for the Approved Project on May 23, 2012. Based on all available information, in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which would require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which would require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was adopted, that shows any of the following:
 - The project would have one or more significant effects not discussed in the previous environmental document;
 - Significant effects previously examined would be substantially more severe than shown in the previous environmental document;
 - Mitigation measures previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based on a review of the Modified Project, none of the situations described in Section 15162 of the State CEQA Guidelines apply. No changed circumstances have occurred, and no new information of substantial importance has become known, which would result in new significant or substantially increased adverse impacts as a result of the Modified Project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the State CEQA Guidelines. Public review of this Addendum is not required under CEQA.

3.1 Impact Summary

The potential impacts of the Modified Project on the environmental factors in the checklist below were evaluated in this Addendum. None were found to involve new significant environmental effects or a substantial increase in the severity of environmental effects either due to a change in the Approved Project, change in circumstances, or new information of substantial importance. As discussed in Section 4 of this Addendum, the Modified Project would not result in new or more severe environmental effects, and no new mitigation would be required.

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that no substantial changes are proposed in the project, there are no substantial changes in the circumstances under which the project will be undertaken, and there is no new information of substantial importance that was unknown when the project was approved. Major revisions to the previous approved ND or MND or certified EIR are not required due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, the previously adopted ND or MND or previously certified EIR adequately addresses the potential impacts of the project without modification.
- I find that no substantial changes are proposed in the project, there are no substantial changes in the circumstances under which the project will be undertaken, and there is no new information of substantial importance that was unknown when the project was approved. Major revisions to the previous approved ND or MND or certified EIR are not required due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The previously adopted ND or MND or previously certified EIR adequately addresses the potential impacts of the project. However, minor changes require the preparation of an ADDENDUM.
- I find that substantial changes are proposed in the project, there are substantial changes in the circumstances under which the project will be undertaken, or there is new information of substantial importance that was unknown when the project was approved. Major revisions to the previous approved ND or MND or certified EIR are required due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. However, all new potentially significant environmental effects or substantial increases in the severity of previously identified significant effects are reduced to below a level of significance through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT MND is required.
- I find that substantial changes are proposed in the project, there are substantial changes in the circumstances under which the project will be undertaken, or there is new information of substantial importance that was unknown when the project was approved. Major revisions to the previous approved environmental document are required due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. However, only minor changes or additions or changes would be necessary to make the previously certified EIR adequate. Therefore, a SUPPLEMENTAL EIR is required.
- I find that substantial changes are proposed in the project, there are substantial changes in the circumstances under which the project will be undertaken, or there is new information of substantial importance that was unknown when the project was approved. Major revisions to the previously approved environmental document are required due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, a SUBSEQUENT EIR is required.

Won Flores
Signature

November 5, 2025
Date

Won Flores
Printed Name

Principal Planner
Title

4.0 Environmental Checklist

The following analysis follows the CEQA Guidelines Appendix G Environmental Checklist to evaluate the adequacy of the environmental impact findings and mitigation determined in the Approved Project/Final EIR relative to impacts and mitigation of the Modified Project.

4.1 Aesthetics

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Scenic Vistas	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Scenic Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Visual Character	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Light or Glare	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Scenic Vistas

Approved Project

The Final EIR determined that the Approved Project would not result in the significant obstruction, interruption, or detracting of a scenic vista. Specifically, while the Final EIR determined that the Downtown Specific Plan Update would allow for greater building densities in the Historic District, which could have the potential to block views of scenic historic resources, application of the Planning Principles and Guidelines section of the Downtown Specific Plan Update would protect scenic views. These guidelines promote project design that encourages views to important spaces and buildings. In addition, implementation of the City's existing Grading and Erosion Ordinance would protect views of ridgelines by requiring development to comply with grading design guidelines for development on all steep slopes and require slope analyses and visual analyses for development near skyline ridges. Compliance with existing regulations would continue to protect ridgelines from grading that would obstruct, interrupt, or detract from a view of the ridgelines. Therefore, compliance with existing regulations and General Plan Update and Downtown Specific Plan Update policies would reduce impacts related to obstruction, interruption, or detracting of skyline and intermediate ridgelines to below a level of significance.

Modified Project

The Modified Project would consist of a SPA to the Downtown Specific Plan to remove the ground-floor retail component and increase the allowed building height from 60 feet to 65 feet and the number of stories from four to five for the construction of a five-story, 128-unit multi-family building. The Modified Project site is surrounded by urban development including West Valley Parkway followed by Escondido City Hall to the north and northwest, commercial uses to the east,

northeast, and southwest, John Paul the Great Catholic University to the south, and the Civic Center to the west. Parcels within the Historic Downtown District of the Downtown Specific Plan located east of Valley Boulevard, and north of East Valley Parkway allow for a maximum building height of 75 feet and up to five stories. Therefore, the building height increase associated with the Modified Project site would be consistent with the surrounding urban land uses and would not result in the significant obstruction, interruption, or detracting of a scenic vista.

Like the Approved Project, the Modified Project would be required to comply with the Planning Principles and Guidelines section of the Downtown Specific Plan Update that protect scenic views. These guidelines promote project design that encourages views to important spaces and buildings. In addition, implementation of the City's existing Grading and Erosion Ordinance would protect views of ridgelines by requiring development to comply with grading design guidelines for development on all steep slopes and require slope analyses and visual analyses for development near skyline ridges. Compliance with existing regulations would continue to protect ridgelines from grading that would obstruct, interrupt, or detract from a view of the ridgelines. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Scenic Resources

Approved Project

The Final EIR determined that the Approved Project could have the potential to result in adverse changes to scenic resources as a result of future development activity. However, implementation of the City's Grading and Erosion Ordinance and General Plan Update policies in the Resource Conservation Element would protect views of ridgelines by requiring compliance with grading design guidelines for development on all steep slopes, requiring slope analyses and visual analyses for development near skyline ridges, and prohibiting development on skyline ridges. Therefore, compliance with existing regulations and General Plan Update policies would protect ridgelines from development impacts that would result in substantial adverse changes to scenic ridgelines. Furthermore, the City's Certificate of Appropriateness requirement protects historic districts and the resources within them from adverse exterior impacts. Therefore, impacts related to adverse changes to historic districts would be less than significant. The proposed General Plan Update includes policies to protect other scenic resources, including water bodies, rock outcroppings, and areas of native vegetation, and requirements for future SPAs to protect scenic resources. These policies are intended to ensure that significant adverse changes to scenic resources would not occur. Therefore, compliance with existing regulations and the proposed General Plan Update would ensure that impacts to scenic resources are less than significant.

Modified Project

The Modified Project is located within the retail core area of the Historic Downtown District in the Downtown Specific Plan. The Historic Downtown District is a localized scenic resource. The Modified Project site is developed with a parking lot and would not demolish any existing buildings. Therefore, the Modified Project would not adversely affect the historic exterior appearance of any existing historic buildings, or the Historic Downtown District. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Visual Character or Quality

Approved Project

The Final EIR determined that the Approved Project would allow for additional development within the General Plan Update planning boundary, which could affect the existing visual character or quality of communities within the planning boundary. However, existing City policies and regulations, such as the Zoning and Grading and Erosion Ordinances, General Plan Update design principles and policies, and Downtown Specific Plan Update goals and policies, are intended to protect visual character and quality. These policies establish guidelines for high-quality development consistent with existing visual character and require design review of new development. Therefore, with implementation of existing City policies and regulations, the proposed General Plan Update, and the Downtown Specific Plan Update, the Approved Project would result in a less than significant impact to visual character or quality.

Modified Project

Like the Approved Project, the Modified Project would be required to comply with existing City policies and regulations, such as the Zoning and Grading and Erosion Ordinances, General Plan Update design principles and policies, and Downtown Specific Plan Update goals and policies, which are intended to protect visual character and quality. Implementation of these policies would ensure the Modified Project consists of high-quality development consistent with the existing visual character of the Historic Downtown District. Additionally, the Modified Project would require design review of new development. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Light or Glare

Approved Project

The Final EIR determined that the Approved Project would have the potential to result in increased light and glare that could adversely affect day or nighttime views within the City's urban core. However, future development would be required to comply with the City's outdoor lighting ordinance. Additionally, the General Plan Update and Downtown Specific Plan Update include policies that require new development, including development that would install reflective surfaces as part of E-CAP implementation, to avoid light and glare impacts, including spillover light and incompatible glare. New development would likewise be required to comply with City and General Plan Update policies, as well as Downtown Specific Plan policies, if applicable. Compliance with all applicable regulations and policies would reduce the Approved Project's impacts related to light and glare to below a level of significance.

Modified Project

Like the Approved Project, the Modified Project would be required to comply with the City's outdoor lighting ordinance and all relevant General Plan Update and Downtown Specific Plan policies. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.2 Agriculture and Forestry Resources

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Conversion of Agricultural Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Land Use Conflicts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Indirect Conversion of Agricultural Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Conversion of Agricultural Resources

Approved Project

The Final EIR determined that the Approved Project would result in the potential conversion of 3,546 acres of agricultural resources. However, the General Plan Update provides multiple policies within various elements that promote the preservation of agricultural operations within the Approved Project area. Furthermore, the E-CAP provides additional measures that encourage agricultural efficiency within the Approved Project area. With implementation of the identified General Plan policies and E-CAP measures, the Approved Project would result in a less than significant impact related to the direct conversion of agricultural resources to non-agricultural uses.

Modified Project

The Modified Project site is developed with a parking lot and would not result in the conversion of agricultural resources into non-agricultural uses. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Land Use Conflicts

Approved Project

The Final EIR determined that implementation of the Approved Project would not result in changes to existing agricultural preserve areas and would not impact any existing Williamson Act Contract lands. Additionally, implementation of the Approved Project would not result in any land use changes that would conflict with zoning requirements for agriculture. Furthermore, the General Plan Update and E-CAP include multiple policies and measures that promote local agriculture and agricultural efficiency. Therefore, impacts related to agricultural land use conflicts would be less than significant.

Modified Project

The Modified Project site is developed with a parking lot and would not result in changes to existing agricultural preserve areas or existing Williamson Act Contract lands. Additionally, the Modified Project would not result in any land use changes that would conflict with zoning requirements for agriculture. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Indirect Conversion of Agricultural Resources

Approved Project

The Final EIR determined that implementation of the General Plan Update policies and smart growth planning strategies would reduce the potential for agricultural resources to be converted to non-agricultural resources. Impacts would be less than significant impact.

Modified Project

The Modified Project site is developed with a parking lot and would not convert agricultural resources to non-agricultural resources. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.3 Air Quality

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Air Quality Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Air Quality Violations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sensitive Receptors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Objectionable Odors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the Air Quality Analysis prepared by RECON Environmental, Inc. (Attachment 1).

1. Air Quality Plans

Approved Project

The Final EIR determined that growth accommodated by the Approved Project is consistent with the San Diego Association of Governments (SANDAG) projections accounted for in the San Diego County Regional Air Quality Strategy (RAQS) and California's State Implementation Plan (SIP). Future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP during the City's environmental review process, as well as with the requirements of the City and/or San Diego Air Pollution Control District (SDAPCD) to reduce emissions of particulate matter. Therefore, implementation of the Approved Project would result in a less than significant impact associated with conflicts with applicable air quality plans.

Modified Project

Project consistency is based on whether the Modified Project would conflict with or obstruct implementation of the RAQS and/or applicable portions of the SIP, which would lead to increases in the frequency or severity of existing air quality violations.

The RAQS is the applicable regional air quality plan that sets forth the SDAPCD's strategies for achieving the National and California Ambient Air Quality Standards. The SIP plans for San Diego County specifically include the Redesignation Request and Maintenance Plan for the 1997 National Ozone Standard for San Diego County (2012), the 2004 Revision to the California State Implementation Plan for Carbon Monoxide–Updated Maintenance Plan for Ten Federal Planning Areas, and the 2020 Plan for Attaining the National Ambient Air Quality Standard for Ozone in San Diego County. The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone in accordance with the applicable SIPs. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The most recent 2022 RAQS and Transportation Control Measures (TCMs) were adopted in 2023 (SDAPCD 2022).

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG in the development of regional transportation plans and sustainable communities strategies. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the General Plan would not conflict with the RAQS. If a project proposes development that is less dense than anticipated by the growth projections, the project would be consistent with the RAQS. However, if a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The Modified Project site is designated as Downtown Specific Plan (SPA 9) in the City's General Plan. The Downtown Specific Plan is planned to accommodate up to 5,275 residential units. The Modified Project site is located within the Historic District of the Downtown Specific Plan, which allows for 78

dwelling units (75 dwelling units per one acre). The Modified Project would consist of a SPA to the Downtown Specific Plan to remove the ground-floor retail component and increase the allowed building height from 60 feet to 65 feet and the number of stories from four to five. In addition, the Modified Project would utilize the City's Density Transfer Program to transfer 50 units to the Modified Project site from underutilized sites within the Downtown Specific Plan to allow for the construction of 128 multi-family units. The Modified Project would be consistent with the overall density of the Historic District and would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area. Therefore, the Modified Project would not result in an increase in growth beyond what is anticipated by the General Plan. Additionally, the Modified Project would be consistent with the growth projections accounted for in the RAQS. Thus, the Modified Project would not obstruct or conflict with implementation of the RAQS or SIPs. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Air Quality Violations

Approved Project

The Final EIR determined that the Approved Project would result in significant emissions of volatile organic compounds and particulate matter with a diameter of 10 microns and less (PM₁₀) during construction. This estimate assumes equal amounts of development occurring each year. Realistically, yearly construction emissions for all pollutants may be greater or lower depending on how development is implemented. Based on the conservative planning-level assumptions of this analysis, impacts related to construction emissions would be potentially significant.

Operational emissions of criteria pollutants associated with future development under the Approved Project would exceed the significance thresholds for PM₁₀ and particulate matter with a diameter of 2.5 microns and less (PM_{2.5}). Future development under the Approved Project would be required to comply with California Air Resources Board (CARB) motor vehicle standards, SDAPCD regulations for stationary sources and architectural coatings, and the General Plan Update goals and policies. While the General Plan goals and policies are intended to reduce impacts associated with air quality violations, these measures cannot guarantee that operational emissions would be reduced to a less than significant level. Therefore, the Approved Project would result in a potentially significant impact associated with air quality violations during construction and operation. The Final EIR identifies **Mitigation Measure Air-1** to reduce construction related emissions and **Mitigation Measure Air-2**, which requires the preparation of air quality studies for projects that exceed a screening level. However, impacts would remain significant and unmitigated.

Modified Project

The region is classified as an attainment area for all criterion pollutants except ozone, PM₁₀, and PM_{2.5}. The SDAB is a non-attainment area for the 8-hour federal and state ozone standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_x and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. PM_{2.5} includes fine particles that are found in smoke and haze and are emitted from all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM₁₀ includes both fine and coarse dust particles, and sources include crushing or grinding operations and dust from paved or unpaved roads. Consistent with **Mitigation Measure Air-2**, an Air

Quality Analysis for the Modified Project was prepared (see Attachment 1). Construction and operational emissions associated with the Modified Project were calculated using the California Emissions Estimator Model (CalEEMod) 2022.1 (California Air Pollution Control Officers Association 2022) as a part of the air quality analysis prepared for the Modified Project (see Attachment 1).

Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include the following:

- fugitive dust from grading activities;
- construction equipment exhaust;
- construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- construction-related power consumption.

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations.

Maximum construction emissions associated with the Modified Project are summarized in Table 1.

Construction	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	1	14	16	<1	2	1
Site Preparation	1	11	12	<1	3	2
Grading	2	16	15	<1	4	2
Building Construction	1	9	14	<1	1	<1
Paving	1	4	7	<1	<1	<1
Architectural Coatings	45	1	2	<1	<1	<1
Maximum Daily Emissions	45	16	16	<1	4	2
<i>Significance Threshold</i>	<i>75</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter with a diameter of 10 microns and less; PM _{2.5} = particulate matter with a diameter of 10 microns and less SOURCE: Attachment 1						

For assessing the significance of the air quality emissions resulting during construction of the Modified Project, the construction emissions were compared to the City's screening thresholds. As shown in Table 1, maximum daily construction emissions associated with the Modified Project are projected to be less than the applicable thresholds for all criteria pollutants. These thresholds are designed to provide limits below which project emissions would not significantly change regional air quality.

The Modified Project would be required to implement dust control measures in accordance with SDAPCD Rules 50, 51, 52, 54, and 55. The Modified Project would also be required to implement mitigation measures identified in the Final EIR, including **Mitigation Measure Air-1**, to reduce construction-related emissions. Furthermore, all construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to five minutes, requires all construction fleets to be labeled and report to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements.

Because it would not exceed the applicable thresholds for all criteria pollutants and would implement standard construction measures compliant with mandatory SDAPCD rules and regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation, as well as mitigation measures identified in the Final EIR, Modified Project construction emissions would not result in regional emissions that would exceed the National or California Ambient Air Quality Standards or contribute to existing violations. Therefore, construction associated with the Modified Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Modified Project region is non-attainment, and impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Operation

The Modified Project would result in operational emissions associated with mobile, area, and energy sources. Based on the Local Mobility Analysis, the Modified Project would generate six weekday trips per unit for a total of 768 daily weekday trips (see Attachment 1). Area source emissions associated with the Modified Project include consumer products, architectural coatings, and landscaping equipment. Energy source emissions associated with the Modified Project include natural gas used in space and water heating.

Maximum operational emissions associated with the Modified Project are summarized in Table 2.

Table 2 Summary of Maximum Operational Emissions (pounds per day)						
	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources	3	2	16	<1	3	1
Area Sources	3	<1	7	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Total	6	2	24	<1	3	1
<i>Significance Threshold</i>	<i>55</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter with a diameter of 10 microns and less; PM _{2.5} = particulate matter with a diameter of 10 microns and less SOURCE: Attachment 1						

As shown in Table 2, maximum daily operational emissions associated with the Modified Project are projected to be less than the applicable thresholds for all criteria pollutants. Therefore, operational emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the Modified Project region is non-attainment, impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Sensitive Receptors

Approved Project

The Final EIR determined that the Approved Project would not result in a carbon monoxide (CO) hotspot at the most congested intersections in the City and impacts associated with CO hotspots would be less than significant. Regarding toxic air contaminants (TACs), the Final EIR determined that future development would result in potentially significant emissions of diesel particulate matter (DPM) and other TACs. Land development projects are required to comply with Assembly Bill (AB) 2588, SDAPCD Rule 1210, Toxic Air Contaminant Public Health Risks—Public Notification and Risk Reduction, and CARB standards for diesel engines. The General Plan Air Quality and Climate Protection Element requires future land uses to be sited according to CARB recommendations. Therefore, impacts related to TACs from freeways, dry cleaning facilities, and gas stations would be less than significant. However, CARB does not make specific recommendations for other potential sources of TACs in the planning area, including waste transfer, industrial, medical, and research and development facilities. Therefore, the Approved Project would result in a potentially significant impact to sensitive receptors. The Final EIR identifies **Mitigation Measures Air-3** and **Air-4**, which require the preparation of health risk assessments (HRAs) for sensitive receptors sited within 500 feet of a waste transfer facility and within one mile of industrial, medical, or research and development facilities that are sources of TACs. Implementation of these mitigation measures would reduce impacts to a less than significant level.

Modified Project

Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The Modified Project site is surrounded by commercial and institutional uses. The nearest sensitive land uses are the residential uses located approximately 450 feet northeast of the Modified Project site.

Carbon Monoxide Hot Spots

Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal Clean Air Act. This means that SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Bay

Area Air Quality Management District (BAAQMD) developed a screening threshold in their 2022 CEQA Guidelines (BAAQMD 2022). These screening criteria are considered applicable in the SDAB because the San Francisco Bay Air Basin and the SDAB have the same CO maintenance designations. If the following screening criteria are met, operation of a project would result in less than significant impacts related to CO:

- The Modified Project would be consistent with an applicable congestion management program established by the County of San Diego (County) congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Traffic generated from the Modified Project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Based on the Local Mobility Analysis (LMA) prepared for the Modified Project, turning volumes at affected intersections would be significantly less than both the 44,000 vehicles per hour and 24,000 vehicles per hour screening levels identified above (Attachment 2). Furthermore, these intersections are projected to operate at level of service A, B, or C, which are considered acceptable. Therefore, the Modified Project's traffic contribution of 768 would not generate a CO hot spot that could expose sensitive receptors to substantial pollutant concentration. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Diesel Particulate Matter – Construction

Construction of the Modified Project would result in the generation of diesel-exhaust DPM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the Modified Project site.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction is anticipated to last for approximately 18 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Modified Project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 18 months, the exposure would be five percent of the total 30-year exposure period used for health risk

calculation. Furthermore, the nearest sensitive receptors are located 450 feet or more from the Modified Project site, and DPM would dissipate quickly with distance from the site. Construction activities would be subject to several control measures per the requirements of SDAPCD rules and regulations and CARB Airborne Toxic Control Measures (see Section 4.3(2), above). Due to the short-term construction duration and the limited construction emissions, there is very low potential for fugitive dust or DPM to impact sensitive receptors during construction. The total construction DPM emissions are not of a magnitude and duration that could create significant air toxic risks to the nearest receptors during construction. Compliance with the SDAPCD rules and regulations would reduce the fugitive dust emissions during construction and associated impacts to sensitive receptors. Thus, the Modified Project's construction emissions would not have the potential to significantly impact the nearby residents. Therefore, the Modified Project would not expose sensitive receptors to substantial levels of TACs during construction. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Diesel Particulate Matter – Operation

The CARB handbook indicates that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible. The Modified Project site is not located within 500 feet of a freeway or heavily traveled roadway. Therefore, the Modified Project would not expose sensitive receptors to substantial pollutant concentrations associated with DPM during operation. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Stationary Sources

As discussed above under the Approved Project, the Final EIR identifies **Mitigation Measure Air-3**, which requires the preparation of HRAs for sensitive receptors sited near a waste transfer facility, and **Mitigation Measure Air-4**, which requires the preparation of HRAs for sensitive receptors sited near industrial, medical, or research and development facilities. The Modified Project site is not located within 500 feet of a waste transfer facility. The Modified Project site is not located within the recommended screening distances of gas stations or dry cleaners. The SDAPCD Air Toxic "Hot Spot" Mapping Tool identifies facilities that have prepared HRAs (SDAPCD 2025). The Modified Project site is not located within one mile of any facility that requires public notification and risk reduction. Therefore, the Modified Project site is not located within any area of impact identified by the mapping tool and impacts associated with TACs from stationary sources would be less than significant and **Mitigation Measures Air-3** and **Air-4** would not apply. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Odors

Approved Project

The Final EIR determined that while odor sources are present within the General Plan Update and Downtown Specific Plan planning areas, such as the Hale Avenue Resource Recovery Facility (HARRF) and waste transfer facility, SDAPCD Rule 51, Nuisance, prohibits nuisance odors that adversely affect nearby receptors. Development of land uses consistent with the Approved Project that would have the potential to result in nuisance odors, such as new industrial facilities, would be required to comply

with SDAPCD regulations related to odor. The General Plan Update land use designations prohibit the siting and construction of land uses in mixed use development that are incompatible due to odors. Compliance with SDAPCD Rule 51 and the General Plan Update would ensure that a substantial number of sensitive receptors would not be exposed to objectionable odors. Additionally, the Final EIR determined that odors generated by construction activities would not be significant. Therefore, the Approved Project's impacts associated with objectionable odors would be less than significant.

Modified Project

The potential for an odor impact is dependent on several variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. Similar to the Approved Project, exposure to odors associated with construction would be short term and temporary in nature (18 months) and would disperse quickly with distance from the Modified Project site. Therefore, construction would not generate other emissions (such as those leading to odors) adversely affecting a substantial number of people. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

The following list provides some common types of facilities that are known producers of objectionable odors (BAAQMD 2022). This list of facilities is not meant to be all-inclusive.

- Wastewater Treatment Plant
- Wastewater Pumping Facility
- Sanitary Landfill
- Transfer Station
- Composting Facility
- Petroleum Refinery
- Asphalt Batch Plant
- Chemical Manufacturing
- Fiberglass Manufacturing
- Painting/Coating Operations
- Rendering Plant
- Coffee Roaster
- Food Processing Facility
- Confined Animal Facility/Feed Lot/Dairy
- Green Waste and Recycling Operations
- Metal Smelting Plants

The Modified Project does not include any of these uses that are typically associated with odor complaints. The Modified Project does not propose any uses or activities that would result in potentially significant operational-source odor impacts and, consistent with the General Plan Update, would not site any use that would be incompatible due to odors. Therefore, the Modified Project would not generate other emissions (such as those leading to odors) adversely affecting a substantial number of people. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

Air-1: Construction Dust Control Measures. During grading activities for any future development within the General Plan Update planning area boundary, the onsite construction superintendent shall ensure implementation of standard best management practices to reduce the emissions of fugitive dust, including but not limited to the following actions:

- i. Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water will be applied at a frequency to be determined by the onsite construction superintendent.
- ii. Temporary hydroseeding with irrigation will be implemented on all graded areas on slopes, and areas of cleared vegetation will be revegetated as soon as possible following grading activities in areas that will remain in a disturbed condition (but will not be subject to further construction activities) for a period greater than three months during the construction phase.
- iii. Operate all vehicles on the construction site at speeds less than 15 miles per hour.
- iv. Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer.
- v. If a street sweeper is used to remove any track-out/carry-out, only PM10-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

Air-2: Air Quality Impact Assessment. An Air Quality Impact Analysis shall be prepared for projects within the General Plan Update boundary that exceed one of the air quality study trigger criteria in Table 4.3 12, Air Quality Impact Analysis Trigger Criteria.

4.4 Biological Resources

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Special Status Species	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Riparian Habitat and Other Sensitive Natural Communities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Federally Protected Wetlands	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Wildlife Movement Corridors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Local Policies and Ordinances	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Habitat Conservation Plans and Natural Community Conservation Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**1. Special Status Species***Approved Project*

The Final EIR determined that compliance with existing regulations and the General Plan Update goals and policies would reduce direct and indirect impacts to special status species to a less than significant level. However, until the City's Multiple Habitat Conservation Program (MHCP) Subarea Plan is adopted, the Approved Project would result in a cumulatively considerable impact to species identified as a candidate, sensitive, or special status species. Adoption of the MHCP Subarea Plan would reduce the Approved Project's contribution of potential cumulative impacts to a less than significant level; however, this conservation plan requires approval at the federal and state levels, which the City cannot guarantee ahead of time. In addition, the timing of the MHCP Subarea Plan adoption may not coincide with General Plan Update impacts in these areas. Therefore, requiring adoption of the MHCP Subarea Plan cannot be considered feasible mitigation for the Approved Project. Until the City's MHCP Subarea Plan is adopted, the Approved Project's cumulatively considerable contribution to a significant cumulative impact to sensitive species would be significant and unavoidable.

Modified Project

The City's MHCP Subarea plan has not been adopted since certification of the Final EIR. The Modified Project site is developed with a parking lot and does not contain native habitat on-site. Thus, implementation of the Modified Project would not result in impacts to special status plant and wildlife species and their habitat. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Riparian Habitat and Other Sensitive Natural Communities*Approved Project*

The Final EIR determined that compliance with existing regulations and the General Plan Update goals and policies would reduce direct and indirect impacts to riparian habitats and other sensitive natural communities to a less than significant level. However, until the City's MHCP Subarea Plan is adopted, the Approved Project would result in a cumulatively considerable impact to riparian habitats and other sensitive natural communities. Adoption of the MHCP Subarea Plan would reduce the Approved Project's contribution of potential cumulative impact to a less than significant level; however, this conservation plan requires approval at the federal and state levels, which the City cannot guarantee ahead of time. In addition, the timing of MHCP Subarea Plan adoption may not coincide with General Plan Update impacts. Therefore, requiring adoption of the MHCP Subarea Plan cannot be considered feasible mitigation for the Approved Project. Until the City's MHCP Subarea Plan is adopted, the Approved Project's cumulatively considerable contribution to a significant cumulative impact to sensitive habitats would be significant and unavoidable.

Modified Project

The City's MHCP Subarea plan has not been adopted since certification of the Final EIR. The Modified Project site is developed with a parking lot and does not contain native habitat on-site. Thus, implementation of the Modified Project would not result in impacts to riparian habitat and other sensitive natural communities. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Federally Protected Wetlands

Approved Project

The Final EIR determined that implementation of the Approved Project would have the potential to result in impacts to federal wetlands from future development. However, future development that would potentially impact a wetland would be required to obtain permitting from federal and/or state agencies. Additionally, proposed General Plan Update policies require the protection of wetland habitats and require biological surveys and mitigation for potential impacts to biological resources. Therefore, compliance with existing permitting requirements and proposed General Plan Update policies would reduce impacts to a less than significant level.

Modified Project

The Modified Project site is developed with a parking lot and does not contain native habitat or wetlands on-site. Thus, implementation of the Modified Project would not result in impacts to federally protected wetlands. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Wildlife Movement Corridors

Approved Project

The Final EIR determined that compliance with existing regulations and the General Plan Update goals and policies would reduce impacts to wildlife movement corridors and nursery sites to a less than significant level. However, until the City's MHCP Subarea Plan is adopted, the Approved Project would result in a cumulatively considerable impact to wildlife movement corridors and nursery sites. Adoption of the MHCP Subarea Plan would reduce the Approved Project's contribution of potential cumulative impacts to a less than significant level; however, this conservation plan requires approval at the federal and state levels, which the City cannot guarantee ahead of time. In addition, the timing of MHCP Subarea Plan adoption may not coincide with General Plan Update impacts. Therefore, requiring adoption of the City's MHCP Subarea Plan cannot be considered feasible mitigation for the Approved Project. Until the MHCP Subarea Plan is adopted, the Approved Project's cumulatively considerable contribution to a significant cumulative impact to wildlife movement corridors and nursery sites would be significant and unavoidable.

Modified Project

The City's MHCP Subarea plan has not been adopted since certification of the Final EIR. The Modified Project site is developed with a parking lot, is surrounded by urban uses, and does not contain native habitat on-site. Thus, implementation of the Modified Project would not result in impacts to wildlife movement corridors. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Local Policies and Ordinances*Approved Project*

The Final EIR determined that implementation of the Approved Project would be required to comply with applicable sections of the City's Zoning Ordinance. Regulatory processes to ensure compliance are already in place and would not be impacted by the General Plan Update. Compliance with the requirements of the Zoning Ordinance, existing regulations, preservation agreements, and the proposed General Plan Update would protect the open space resources identified in the City's Master Plan for Parks, Trails, and Open Space. Therefore, impacts associated with local policies and ordinances would be less than significant.

Modified Project

The Modified Project site is developed with a parking lot and does not contain any open space resources. Thus, implementation of the Modified Project would not result in impacts related to local policies and ordinances. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

6. Habitat Conservation Plans and Natural Community Conservation Plans*Approved Project*

The Final EIR determined that future projects proposed under the Approved Project would be required to comply with applicable habitat conservation plans (HCPs) and the Natural Community Conservation Planning (NCCP) program. Existing regulations and the proposed General Plan Update policies would ensure future compliance of projects proposed under the General Plan Update and Downtown Specific Plan Update. Implementation of E-CAP measures would be required to comply with the applicable Multiple Species Conservation Program or MHCP, if adopted. Therefore, a potentially significant impact associated with conflicts with habitat conservation plans and NCCPs would not occur.

Modified Project

The Modified Project site is developed with a parking lot and does not contain native habitat on-site. Thus, implementation of the Modified Project would not result in impacts to habitat conservation plans or NCCPs. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.5 Cultural and Paleontological Resources

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Historical Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Archaeological Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Paleontological Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Human Remains	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Historical Resources

Approved Project

The Final EIR determined that implementation of the Approved Project would have the potential to result in substantial adverse changes to the significance of historical resources. Designated and potentially significant historical resources could be disturbed due to demolition, destruction, alteration, or structural relocation as a result of new private or public development or redevelopment allowable under the Approved Project. While existing City and County policies (as applicable) and regulations, as well as proposed General Plan Update and Downtown Specific Plan goals and policies, are intended to protect historical resources, specific measures that implement these policies and regulations are necessary to ensure that the intended protections are achieved. Therefore, the Approved Project was determined to result in a potentially significant impact to historical resources. Implementation of **Mitigation Measure Cul-1**, which would enhance community appreciation of the importance of the City’s historic sites and buildings, and protect and preserve significant historical resources to the extent feasible through the identification of features of cultural and historical significance to the community and designation as landmark features, structures and sites of historic, aesthetic, and special character, would reduce potential impacts to historical resources to a less than significant level.

Modified Project

The Modified Project site is developed with a parking lot, and it is not identified as a significant historical site in Table 4.5-2 of the Final EIR. Thus, development of the Modified Project would not result in substantial adverse changes to the significance of historical resources and **Mitigation Measure Cul-1** from the Final EIR would not apply. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Archaeological Resources

Approved Project

The Final EIR determined that the Approved Project would have the potential to result in a substantial adverse change in the significance of an archaeological resource, including the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory. While the proposed General Plan Update goals and policies are intended to protect archaeological resources, specific measures that implement these policies and regulations are necessary to ensure that the intended protections are achieved. Therefore, the Approved Project was determined to result in a potentially significant impact to archaeological resources. Implementation of **Mitigation Measures Cul-3, Cul-4, Cul-5, and Cul-6**, which address the monitoring and treatment of cultural resources, development of cultural resources management and restoration plans, supporting the dedication of easements that protect important cultural resources, and protecting significant cultural resources through tribal consultation, would reduce potential impacts to archaeological resources to a less than significant level.

Modified Project

The Modified Project would consist of a SPA to the Downtown Specific Plan to remove the ground-floor retail component and increase the allowed building height from 60 feet to 65 feet and the number of stories from four to five for the construction of a five-story, 128-unit multi-family building. In accordance with the provisions of Senate Bill (SB) 18 the City sent letters to 20 tribes on November 13, 2024. The Pala Band of Mission Indians responded in a letter dated December 5, 2024; however, they did not request consultation. The Rincon Band of Luiseño Indians (Rincon) requested consultation in a letter dated November 21, 2024. The City met with Rincon on December 5, 2024, and March 17, 2025, during which Rincon requested the presence of Native American monitors during any ground-disturbing activities. The Modified Project would incorporate **Mitigation Measures Cul-3, Cul-4, Cul-5, and Cul-6**, which were previously adopted in the Final EIR. With incorporation of the previously adopted **Mitigation Measures Cul-3, Cul-4, Cul-5, and Cul-6** impacts would be reduced to a less than significant level. Additionally, as requested by Rincon, the Modified Project would include a condition of approval requiring a Rincon Native American monitor to be on-site during grading. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Paleontological Resources

Approved Project

The Final EIR determined that the Approved Project would have the potential to directly or indirectly destroy a unique paleontological resource or site. Such potential impacts are anticipated when excavations occur in geologic formations having high or moderate sensitivity and high or moderate fossil-bearing potential. However, existing policies and regulations and proposed General Plan Update goals and policies protect unique paleontological resources and would reduce any potential impacts to paleontological resources to a less than significant level. Therefore, the Approved Project would result in a less than significant impact to unique paleontological resources.

Modified Project

As identified in Figure 4.5-2 in the Final EIR, the geologic formation underlying the Modified Project site is old alluvial valley deposits. Old alluvial valley deposits are considered to have a moderate paleontological sensitivity. Ground-disturbing activities in moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Areas proposed for discretionary development projects that are subject to CEQA review and found in areas identified as having high or moderate sensitivity for paleontological resources are required by the City to conduct a preliminary assessment by a professional paleontological resource consultant to determine if the characteristics of a unique paleontological resource or site are present. Since the Modified Project site is developed with a parking lot, the City did not require a preliminary assessment. However, the Modified Project would require excavation and additional grading activities. Therefore, the Modified Project would include a condition of approval requiring a paleontological monitor to be on-site during grading. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Human Remains

Approved Project

The Final EIR determined that the Approved Project would have the potential to disturb human remains, including those located outside of formal cemeteries. Ground-disturbing activities from the development of land would have the potential to cause adverse impacts to human remains. However, existing federal and state policies and regulations would reduce impacts associated with human remains to a less than significant level. Therefore, the Approved Project would result in a less than significant impact to human remains.

Modified Project

The Modified Project site is developed with a parking lot and there are no dedicated cemeteries or recorded burials within the Modified Project site footprint or surrounding area. Therefore, the potential for encountering human remains during construction is very low. In the unlikely event of a discovery of human remains, they would be handled in accordance with the California Public Resources Code (Section 5097.98), State Health and Safety Code (Section 7050.5), and California Government Code Section 27491. These regulations detail specific procedures to follow in the event of a discovery of human remains (i.e., work would be required to halt, and no soil would be exported off-site until a determination could be made via the County Coroner and other authorities as required). Adherence to these regulatory requirements in the event of an unanticipated discovery would ensure that the Modified Project would not disturb human remains, including those interred outside of dedicated cemeteries. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

Cul-3: Require that significant archaeological resources be preserved in-situ, as feasible. The incorporation of resources into historical parks and multiple use recreation parks shall be encouraged. When avoidance of impacts is not possible, data recovery mitigation shall be required for all significant resources. Any significant artifacts recovered during excavation, other than cultural material subject to repatriation, shall be curated with its associated records at a curation facility approved by the City. Excavation of deposits of Native American origin shall be coordinated with and monitored by local Native American representatives.

Cul-4: Develop management and restoration plans for identified and acquired properties with cultural resources.

Cul-5: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grant or matching funds, or funds from private organizations.

Cul-6: Protect significant cultural resources through coordination and consultation with the NAHC and local tribal governments, including SB-18 review.

4.6 Geology and Soils

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Exposure to Seismic-Related Hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Soil Erosion or Topsoil Loss	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Soil Stability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Expansive Soils	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Wastewater Disposal Systems	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the Geotechnical Investigation prepared by Christian Wheeler Engineering (Attachment 3).

1. Exposure to Seismic-Related Hazards

Approved Project

The Final EIR determined that implementation of the Approved Project would designate land uses that would allow development to occur in areas with geological risks such as seismically induced ground shaking, liquefaction, and landslides. Impacts from seismically induced fault rupture would not occur due to the lack of active fault traces in the Approved Project area. Future development consistent with the Approved Project area would be required to comply with all relevant federal and state regulations and building standards, including Seismic Design Categories E and F structural design requirements identified in the California Building Code (CBC). Additionally, the proposed

General Plan Update includes multiple policies intended to reduce seismic hazards. Therefore, impacts from seismically induced fault rupture, ground shaking, liquefaction, and landslides would be less than significant.

Modified Project

As discussed in the Geotechnical Investigation (see Attachment 3), no active or potentially active faults are known to traverse the Modified Project site. The active Elsinore Fault Zone is located approximately 15 miles northeast of the Modified Project site. Like the Approved Project, the Modified Project would be required to comply with all relevant federal and state regulations and building standards, including Seismic Design Categories E and F structural design requirements identified in the CBC. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Soil Erosion or Topsoil Loss

Approved Project

The Final EIR determined that compliance with existing regulations, such as the CBC and the National Pollutant Discharge Elimination System permit program, and the policies identified in the General Plan Update would reduce potential impacts to soil erosion or the loss of topsoil from implementation of the Approved Project to below a level of significance.

Modified Project

Construction of the Modified Project would displace soils and temporarily increase the potential for soil erosion. However, the Modified Project would implement construction Best Management Practices (BMPs) consistent with the requirements of the City's Storm Water Design Manual, which would minimize erosion and loss of topsoil. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Soil Stability

Approved Project

The Final EIR determined that implementation of the Approved Project would have the potential to result in hazards associated with landslides and liquefaction. However, future development under the General Plan Update would be required to comply with federal and state building standards and regulations, including the CBC. Compliance with such regulations, in addition to implementation of the proposed General Plan Update policies, would reduce impacts associated with on- or off-site landslides and liquefaction to a less than significant level.

Modified Project

As discussed in the Geotechnical Investigation (see Attachment 3), the Modified Project site has a very low potential for landsliding. Additionally, the near surface soils encountered at the Modified Project site were found to not be considered susceptible to liquefaction due to such factors as depth

to the groundwater table, soil density, and grain-size distribution. Additionally, the Modified Project would include the project site-specific recommendations included in the Geotechnical Investigation. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Expansive Soils

Approved Project

The Final EIR determined that the Approved Project would designate land uses that would allow for the development of structures on potentially expansive soils. Therefore, future construction projects in the Approved Project area would be affected by expansive soils. However, future projects would be required to comply with all applicable federal and state regulations, including the CBC. Compliance with such regulations, and implementation of proposed General Plan Update policies, would reduce potentially significant impacts to below a level of significance.

Modified Project

As discussed in the Geotechnical Investigation (see Attachment 3), the foundation soils underlying the Modified Project site are quaternary-age older alluvium and weathered granitic bedrock. The quaternary-age older alluvium and weathered granitic bedrock were found to have a low expansion index. Additionally, the Modified Project would include the project site-specific recommendations included in the Geotechnical Investigation. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Wastewater Disposal Systems

Approved Project

The Final EIR determined that implementation of the Approved Project would designate land uses that have the potential to allow development to occur in areas where soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. However, future development projects would be required to comply with all applicable state and local regulations related to septic tanks and wastewater disposal, including County Department of Environmental Health requirements for issuance of an on-site wastewater treatment systems permit. Compliance with such regulations would reduce the potential for septic systems to be within areas with soils incapable of supporting such systems. Therefore, impacts would be less than significant.

Modified Project

The Modified Project would connect to existing sewer lines and would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.7 Greenhouse Gas Emissions

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Compliance with AB 32	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Potential Effects of Global Climate Change on the Proposed General Plan Update	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the CAP Checklist prepared by RECON Environmental, Inc. (Attachment 4).

1. Compliance with AB 32

Approved Project

For the first impact threshold analyzed in the Final EIR, per Appendix G of the CEQA Guidelines, impacts related to GHG emissions are normally considered significant if implementation of the Approved Project would result in any of the following:

- a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

To assess impacts associated with GHG emissions, the Approved Project was compared for consistency with AB 32 reduction targets to determine significance. The AB 32 reduction target has been determined as the reduction of statewide GHG emissions to 1990 levels by 2020, or as outlined in the AB 32 Scoping Plan, the functional equivalent of 15 percent below "current" (2005) levels by 2020.

The Final EIR determined that with the incorporation of the GHG-reducing policies of the Approved Project and the E-CAP reduction measures, the City would reduce emissions to a level that is below the 2020 reduction target. Therefore, the impact associated with GHG emissions from the Approved Project would be less than significant and no additional mitigation was required.

Modified Project

Since preparation of the Final EIR, the reduction target year of 2020 has passed. The statewide 2020 GHG reduction goals were achieved. Additionally, the City has since updated its CAP with the most recent version adopted in March 2021. The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. The CAP's

strategies and measures are designed to reduce GHG emissions for build-out under the General Plan. In order to reduce emissions and meet updated statewide targets, the CAP has established local reduction targets consistent with CARB's 2017 Climate Change Scoping Plan. To support the achievement of statewide GHG reduction targets and reduce emissions locally, the CAP sets the following emission reductions targets using 2012 levels as a reference point:

- 4 percent below 2012 levels by 2020;
- 42 percent below 2012 levels by 2030; and,
- 52.5 percent below 2012 levels by 2035.

The City's CAP is a qualified GHG emissions reduction plan in accordance with State CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a CAP. Projects that are consistent with the General Plan and implement applicable CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. Conversely, projects that are consistent with the General Plan but do not implement CAP GHG reduction measures, as well as General Plan Amendments and Annexations that increase emissions beyond CAP projections, will require a project-level GHG analysis.

The purpose of the CAP Consistency Review Checklist (Checklist) is to implement GHG reduction measures from the CAP and determine if development would demonstrate consistency with the CAP's assumptions for implementation. Projects that are consistent with the CAP, as determined by the Checklist, may rely on the CAP for the cumulative impact analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions. The Checklist was used to determine if the Modified Project is consistent with the City's CAP. The first step of the Checklist is to determine if the Modified Project is consistent with the CAP projections. Projects that are consistent with the City's existing General Plan land use designation would be consistent with the CAP projections. If a project is not consistent with the existing land use designation but includes a General Plan Amendment that would result in GHG emissions equal to or less than estimated emissions generated under the existing designation, that project would also be consistent with the CAP projections.

The Modified Project site is designated as Downtown Specific Plan (SPA 9) in the City's General Plan and is zoned Specific Plan Area (S-P). The Downtown Specific Plan specifies a residential density of 75 dwelling units per acre with a ground-floor retail or office component required. Based on these requirements, under the existing designations, the Modified Project site could be developed with up to 78 residential dwelling units and approximately 43,000 square feet of ground-floor retail or office space. The Modified Project would require a SPA that would remove the ground-floor commercial requirement and would utilize the City's Density Transfer Program to transfer 50 units to the Modified Project site from underutilized sites within the Downtown Specific Plan. This would allow for the development of 128 residential dwelling units and no ground-floor retail or office space. The Density Transfer Program requires a deed restriction on the underutilized site to demonstrate that the development rights are severed from the lot, therefore ensuring that the total number of residential dwelling units in the Downtown Specific Plan area would not increase from the planned 5,275 units. Thus, the Modified Project would result in no net increase in GHG emissions associated with the

residential land uses in the Downtown Specific Plan area and would result in a decrease in emissions that would have been associated with ground-floor retail or office use. Therefore, the Modified Project would generate GHG emissions equal to or less than estimated emissions generated under the existing designation.

To further support these conclusions, emissions were calculated for (1) the Modified Project that would construct 128 residential dwelling units, and (2) a hypothetical project consistent with the existing land use designation that would construct 78 residential dwelling units and 43,000 square feet of ground-floor retail space. The results are summarized in Table 3. It is noted that this does not account for the reduction in the overall anticipated GHG emissions in the Downtown Specific Plan area that would result from the reduction of 50 units on an underutilized site. As shown, the Modified Project would result in less GHG emissions than a project consistent with the existing land use designations.

Table 3 GHG Emission Comparison (MT CO ₂ E per Year)		
Source	Modified Project (128 Multi-family Units)	Hypothetical Project (78 Multi-family Units 43,000 Square Feet Retail)
Mobile	581	2,069
Energy	57	53
Area	2	2
Water	7	9
Waste	30	32
Refrigerants	<1	<1
Construction (Amortized over 30 years)	17	16
TOTAL	693	2,181
MT CO ₂ E = metric tons of carbon dioxide equivalent SOURCE: Attachment 4. NOTE: Totals may vary due to independent rounding.		

In summary, because the Modified Project would not result in an increase in residential units in the Downtown Specific Plan area and would remove the ground-floor commercial requirement, and because the Modified Project would result in less GHG emissions than a project consistent with the existing land use designations, the Modified Project would be consistent with the CAP projections.

For projects that are determined to be consistent with CAP projections, the next step is to identify if the Modified Project would be estimated to emit fewer than 500 metric tons of carbon dioxide equivalent (MT CO₂E) annually. If found to emit fewer than 500 MT CO₂E, a project would not contribute considerably to cumulative climate change impacts. These projects would be considered consistent with the CAP and are not subject to the reduction measures of the CAP. As shown in Table 3, the Modified Project would exceed the screening level threshold and is therefore required to implement applicable measures and strategies contained in step 2 of the Checklist.

As detailed in the Checklist (see Attachment 4), the Modified Project would be consistent with the following applicable strategies and measures of the CAP:

- Electric Vehicle Charging Stations (CAP Measures T-1.3 and T-1.4) – The Modified Project would include 114 total parking spaces including five accessible spaces, one van-accessible space, 20 compact spaces, and 88 standard spaces. In addition, of the 114 spaces, 46 would be electric vehicle ready and 11 would be electric vehicle supply equipment spaces. The Modified Project would also include eight short-term bicycle parking spaces and eight long-term bicycle parking spaces.
- Pedestrian Infrastructure (CAP Measure T-3.2) – The Modified Project would improve the frontage by including embellished landscaping, enhanced paving, bicycle racks, enhanced pedestrian lighting and a public art mural on the eastern side of the building. The southern side of the building facing the alley would also include a public art piece and enhanced pedestrian lighting.
- Transportation Demand Management and Transit (CAP Measures T-3.4 and T-3.6) – The Modified Project would construct a multi-family residential use located in the Downtown Specific Plan Area which includes 114 parking spaces, which represents a reduction of more than 15 percent from the otherwise applicable parking requirement. The nearest major transit stop to the Modified Project site is located approximately 0.2 miles east along West Valley Parkway. Pursuant to AB 2097 (Government Code Section 65863.2), cities and counties are prohibited from imposing minimum automobile parking requirements on developments located within 0.5 miles of a major transit stop. Because the Modified Project site is located within 0.5 miles of a qualifying transit stop, it is not subject to the minimum parking requirements. As such, this item is not applicable to the Modified Project. Furthermore, AB 2097 advances the state’s objectives to reduce automobile dependency, increase transit utilization, and achieve vehicle miles traveled (VMT) and GHG reductions, and therefore does not conflict with the intent of the CAP.
- Bicycle Infrastructure (CAP Measure T-3.5) – The Modified Project would provide bike racks at the West Valley Parkway frontage. West Valley Parkway currently has a Class I bike lane, and no additional improvements would be required per the City’s Bicycle Master Plan.
- Alternatively Fueled Water Heaters (CAP Measures E-4.1 and E-4.2) – The Modified Project would include electric heat pump water heaters in all proposed units.
- Electric Cooking Appliances (CAP Measure E-4.2) – The Modified Project would only install electric cooking appliances.
- Zero Net Energy (CAP Measure E-5.2) – The Modified Project is a residential project and is not subject to the CAP’s zero net energy measure.
- Landscape Water Consumption (CAP Measure W-6.2) – The Modified Project is not a single family or townhome project and is not subject to the CAP’s landscape water consumption measure.

- Tree Planting (CAP Measure C-9.1) – The Modified Project would be required to plant one tree per each unit, resulting in a total of 128 trees. The Modified Project includes a landscape plan that would provide a variety of shade and canopy trees along the street frontage, within Maple Street Plaza, and throughout the outdoor amenity space, for a total of 22 trees. The applicant has agreed to pay an in-lieu fee for the remaining 106 trees, totaling \$34,450 (\$325 per tree).

Therefore, the Modified Project would be consistent with the City’s CAP and would result in less than significant GHG impacts related to compliance with statewide GHG reduction goals. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Potential Effects of Global Climate Change on the Proposed General Plan Update

Approved Project

The Final EIR analyzed the impacts of climate change on the Approved Project. Climate change impacts that would be most relevant to the Approved Project are the effects on water supply, wildfires, energy needs, and impacts to public health. The Final EIR estimated impacts to the year 2050, which is further in the future than the scope of the Approved Project, which plans for development to the year 2035. The Final EIR determined that the policies and measures included in the General Plan, E-CAP, and the various other environmental analysis sections of the Final EIR work to conserve resources affected by climate changes such as wildfires, ecosystems, public safety, water supply, public health, and energy. With the implementation of the policies and measures designed to reduce GHG emissions and impacts of climate change, impacts associated with the Approved Project as a result of climate change would be less than significant.

Modified Project

There are no changes associated with the Modified Project that would result in increased impacts related to climate change effects. As discussed above, the Modified Project would be consistent with the City’s CAP. Chapter 5 of the CAP includes an assessment of climate change on the City, outlines key strategies for improving community resilience and adaptation, and addresses and provides equitable resilience and hazard mitigation for everyone in the community. It includes the following adaptation strategies and measures:

- Strategy A-1: Become a “Climate Smart” Leader
 - Measure A-1.1: Fully anticipate, plan for, and mitigate the risks of climate change and seize the opportunities associated with the social and environmental change.
 - Measure A-1.2: Make sure that everyone is given the opportunity to be prepared for the current and future risks that are exacerbated by climate impacts.
 - Measure A-1.3: Hardwire social equity and environmental justice into new programs and projects.
 - Measure A-1.4: Develop working relationships with other agencies and continue to analyze climate impacts.

- Strategy A-2: Build Thriving and Resilient Neighborhoods
 - Measure A-2.1: Make sure that everyone has equitable access to healthy environments in which to live, work, and play.
 - Measure A-2.2: Create “climate safe and decent” housing options.
 - Measure A-2.3: Build capacity for adaptive neighborhoods.
 - Measure A-2.4: Build a sustainable and resilient transportation network.

Each measure identified above includes actions that the City is taking to address the impacts of climate change on its residents. The Modified Project is subject to these CAP adaptation measures as well as General Plan policies related to energy efficiency and conservation, transportation, water consumption, and solid waste reduction. The Modified Project is also subject to state building requirements including Title 24 and California Green Building Standards Code, which focus on energy-efficiency and sustainability.

As with the Approved Project, because the City implements strategies to reduce GHG emissions, conserve water, reduce wildfires, preserve ecosystems, and reduce energy use, impacts associated with climate change on the Modified Project would be less than significant. No new impacts would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

None

4.8 Hazards and Hazardous Materials

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Transport, Use, or Disposal of Hazardous Materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Accidental Release of Hazardous Materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Hazards to Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Existing Hazardous Materials Sites	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Public Airports	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Private Airports	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Emergency Response and Evacuation Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Wildland Fires	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**1. Transport, Use, or Disposal of Hazardous Materials***Approved Project*

The Final EIR determined that implementation of the Approved Project would result in an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses, as designated under the Approved Project, would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations and implementation of the policies proposed within the General Plan Update would ensure the Approved Project's impacts related to transport, use and disposal of hazardous materials would be less than significant.

*Modified Project*Construction

During the construction of the Modified Project, potentially hazardous materials would likely be handled on-site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment as well as specific materials for building construction, such as asphalt and concrete. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the Modified Project. Hazardous materials would be stored in designated areas away from environmentally sensitive areas in quantities that would not pose a significant hazard to the public in the event of a release.

Although these materials would likely be stored on the Modified Project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the Modified Project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration, California Department of Transportation, the Resource Conservation and Recovery Act, and the SDAPCD. Therefore, construction of the Modified Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

Operation

Operation of the Modified Project would require the use of limited amounts of hazardous materials such as common cleaning products, pesticides, and paint, all of which are routinely found in residential and commercial areas. The DTSC has primary regulatory authority for enforcing hazardous materials regulations. Additionally, state hazardous waste regulations are contained

primarily in Title 22 of the California Code of Regulations. Furthermore, the California Occupational Safety and Health Administration has developed rules and regulations regarding worker safety around hazardous and toxic substances. If used, transported, and stored or disposed of properly, these materials do not pose a substantial risk or hazard to the public or the environment. Any potential impacts associated with the routine transport, use, or disposal of hazardous materials, although minimal, would be further minimized with adherence to applicable regulations. Therefore, operation of the Modified Project would not create a significant hazard to the public or the environment through routine use, transport, and disposal of hazardous materials. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Accidental Release of Hazardous Materials

Approved Project

The Final EIR determined that implementation of the Approved Project would result in an increase in land uses that commonly store, use, and dispose of hazardous materials, such as light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial development. Additionally, existing industries and businesses that use hazardous materials may expand or increase to accommodate the projected growth under the General Plan Update. These land uses could result in an accidental release of hazardous materials. Furthermore, implementation of the E-CAP could result in the accidental release of hazardous materials from retrofitting and installation of energy efficient facilities. However, all future development allowable under the land use designations identified in the General Plan Update would be required to comply with applicable federal, state and local regulations related to the transportation, use, storage, and disposal of hazardous materials. Compliance with such regulations would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Therefore, required compliance with existing regulations would ensure the Approved Project's impacts related to an accidental hazardous materials release would be less than significant.

Modified Project

The Modified Project would be required to comply with applicable federal, state and local regulations related to the transportation, use, storage, and disposal of hazardous materials. Furthermore, project construction would be required to implement the Division of Occupational Safety and Health of California Construction Safety Plan/Hazard Communication Program; in case of accidental release, the Modified Project would be required to comply with the Code of Federal Regulations Section 1910.120, which establishes health and safety requirements related to hazardous waste operations. Compliance with such regulations would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Hazards to Schools

Approved Project

The Final EIR determined that the General Plan Update and Downtown Specific Plan Update include land uses that have a high potential for hazardous materials usage to be located within one-quarter-mile of an existing or proposed school or daycare facility. Additionally, the E-CAP identifies GHG reduction measures that have the potential for hazardous materials to be used within one-quarter mile of an existing or proposed school or daycare facility. However, compliance with federal and state regulations pertaining to hazardous waste would ensure that the Approved Project's risk associated with hazardous emissions and schools would remain below a level of significance.

Modified Project

Central Elementary School is located approximately 0.18 miles southeast of the Modified Project site and Classical Academy High School is located approximately 0.20 miles northeast of the Modified Project site. Additionally, Classical Academy Middle School is located approximately 0.28 miles northwest of the Modified Project site. The Modified Project does not propose uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials or substances. Therefore, the Modified Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

4. Existing Hazardous Materials Sites

Approved Project

The Final EIR determined that under implementation of the General Plan Update and Downtown Specific Plan Update, land use and development may be located on a site such as those pursuant to Government Code Section 65962.5, areas with historic or current agricultural operations, or areas with petroleum contamination. However, compliance with applicable existing regulations and processes and implementation of the proposed General Plan Update policies would ensure that the General Plan Update and Downtown Specific Plan Update would not result in a significant hazard to the public or the environment from the location of future land uses for human habitation or occupation on existing hazardous materials sites. The E-CAP does not propose development of any land use that involves human habitation or occupation and was concluded to have no impact. Therefore, the Approved Project would have a less than significant impact associated with existing hazardous materials sites.

Modified Project

Review of the DTSC Envirostor database (DTSC 2025) and the State Water Resources Control Board Geotracker database (2025), determined that there are no contaminated sites with an open status on or adjacent to the Modified Project site. Therefore, the Modified Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No new

or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Public Airports

Approved Project

The Final EIR determined that implementation of the Approved Project would include low-density residential land uses (Estate I, Estate II, Rural I, Rural II) or public land/open space within the Airport Impact Areas for the Ramona and McClellan-Palomar Airports. These land uses generally have low concentrations of people which would reduce the risk of safety hazards for people residing or working in the area. Therefore, the Approved Project would be compatible with the Airport Impact Areas for the Ramona and McClellan-Palomar Airports, and impacts would be less than significant. Furthermore, implementation of the E-CAP would not impose measures that conflict with aircraft operations within the vicinity of a public airport.

Modified Project

The nearest airport to the Modified Project site is McClellan-Palomar Airport, located approximately 11 miles to the west. Review of the Airport Land Use Compatibility Plan for McClellan-Palomar Airport determined that the Modified Project site is not located within a safety zone or noise exposure zone (County of San Diego 2022). Therefore, the Modified Project would not result in a safety hazard or excessive noise for people residing or working in the area. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

6. Private Airports

Approved Project

The Final EIR determined that implementation of the Approved Project could result in land use designations that allow development within two miles of a private airport. However, the land uses proposed within the vicinity of a private airport, specifically Lake Wohlford Resort Airstrip, would be consistent with allowable uses as they would be low density in nature and would preclude high concentrations of persons located in areas adjacent to private airport operations. Furthermore, implementation of the E-CAP would not impact private airport operations. Therefore, the Approved Project would not result in safety hazards for people residing or working in the vicinity of a private airport and impacts would be less than significant.

Modified Project

The nearest private airport to the Modified Project site is the Lake Wohlford Resort Airstrip, located approximately 6.14 miles to the northeast. The Modified Project site is within the Historic Downtown District of the Downtown Specific Plan which is surrounded by urban development. Parcels within the Historic Downtown District of the Downtown Specific Plan located east of Valley Boulevard, and north of East Valley Parkway, allow for a maximum building height of 75 feet and up to five stories. Therefore, the Modified Project would be consistent with the surrounding land uses and would not result in safety hazards for people residing or working in the vicinity of a private airport. No new or

more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

7. Emergency Response and Evacuation Plans

Approved Project

The Final EIR determined that compliance with existing regulations and continual updating of emergency response and evacuation plans would prevent implementation of the General Plan Update and Downtown Specific Plan Update from impairing emergency response and evacuation plans. Furthermore, the E-CAP does not propose measures that would impair emergency response or evacuation plans. Therefore, the Approved Project would not result in a potentially significant impact associated with emergency response and evacuation plans.

Modified Project

The Modified Project would not alter the existing circulation network. All construction activities would be required to comply with the City's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the Modified Project would not interfere with an adopted emergency response plan or emergency evacuation plan. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

8. Wildland Fires

Approved Project

Most of the Approved Project area is located in High or Very High Fire Hazard Severity Zones (FHSZs). The Final EIR therefore determined that implementation of the Approved Project would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. Specifically, the Final EIR found the Approved Project would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. However, compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce impacts to a less than significant level. Implementation of the E-CAP would not expose people or structures to significant hazards involving wildland fires.

Modified Project

Review of the California Department of Forestry and Fire Protection (CAL FIRE) FHSZ maps and data determined that the Modified Project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2025). Furthermore, the Modified Project site is located within an urbanized portion of the City away from any urban/wildland interface. Therefore, the Modified Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.9 Hydrology and Water Quality

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Water Quality Standards and Requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Groundwater Supplies and Recharge	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Erosion or Siltation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Flooding	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Exceed Capacity of Stormwater Systems	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Housing within a 100-year Flood Hazard Area	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Dam Inundation and Flood Hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Seiche, Tsunami, and Mudflow Hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the Storm Water Quality Management Plan (SWQMP) prepared by RICK Engineering Company (Attachment 5) and the Drainage Study prepared by RICK Engineering Company (Attachment 6).

1. Water Quality Standards and Requirements*Approved Project*

The Final EIR determined that development of future land uses as designated in the General Plan Update and Downtown Specific Plan Update would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water and groundwater quality. It is also anticipated that non-point source pollutants, caused from the development of future land uses as designated in the proposed General Plan Update and Downtown Specific Plan Update, would otherwise degrade surface water and groundwater quality. Additionally, proposed land uses could exacerbate existing groundwater quality impacts. Furthermore, the E-CAP would encourage the construction of transit and transportation facilities that could result in polluted runoff during construction or operation. However, implementation of the applicable laws and regulations, in addition to the policies proposed under the General Plan Update, would protect water quality. Impacts would be less than significant.

Modified Project

Construction of the Modified Project would have the potential to generate erosion/sedimentation and pollutants that could impact water quality. As discussed in the SWQMP (see Attachment 5), the Modified Project would implement construction BMPs consistent with the requirements of the City's Storm Water Design Manual, which is a design manual for compliance with the City's Municipal Code (Chapter 22, Article 2) and regional Municipal Separate Storm Sewer Systems Permit (California Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) for storm water management. Storm water runoff from the Modified Project would be managed via a modular wetland system, designed pursuant to the City's Storm Water Design Manual, that would minimize erosion and prevent pollution from affecting water quality. Therefore, the Modified Project would not conflict with applicable laws and regulations related to water quality standards and requirements. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

2. Groundwater Supplies and Recharge

Approved Project

The Final EIR determined that implementation of the Approved Project would not utilize groundwater for any purpose, such as for potable water or landscape irrigation and, therefore, would not deplete groundwater supplies. Additionally, very few groundwater supplies are found throughout the Approved Project area and the General Plan Update proposes policies that would protect these limited resources. Other groundwater sources used to serve the Approved Project area include the Warner Basin aquifer and Lake Henshaw. Neither of these groundwater sources are located within the Approved Project area. Therefore, the Approved Project would result in a less than significant impact to groundwater resources.

Modified Project

Like the Approved Project, the Modified Project would not utilize groundwater for any purpose, such as for potable water or landscape irrigation, and therefore would not deplete groundwater supplies. Therefore, no new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

3. Erosion or Siltation

Approved Project

The Final EIR determined that development of future land uses as designated in the Approved Project would have the potential to result in the alteration of drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Additionally, the development of roadways or transit facilities, encouraged by the E-CAP, could result in substantial erosion or siltation on- or off-site during construction and operational activities. However, new construction and development would continue to implement the National Pollutant Discharge Elimination System permit program, which requires a SWPPP to be prepared and BMPs to be identified for construction sites greater than one acre. Additionally, all land disturbance activities occurring within the Approved Project area would

be subject to the discharge prohibitions and additional requirements stated in the City’s Jurisdictional Runoff Management Plan. Adherence to existing regulations would reduce erosion by minimizing site disturbance and controlling internal construction erosion. Compliance with the applicable existing regulations and implementation of the proposed General Plan Update policies would reduce impacts associated with excessive erosion or siltation to below a level of significance. Therefore, the Approved Project would result in a less than significant impact associated with excessive erosion or siltation.

Modified Project

As discussed in the Drainage Study (see Attachment 6), existing drainage on the Modified Project site drains to a single point of compliance (POC-1). Half of the Modified Project site currently drains in the easterly direction, to an existing grate inlet along the eastern corner of the site. The other half of the Modified Project site drains in the northerly direction, to an existing grate inlet along the northern corner of the site. Existing flows are conveyed through the existing storm drain system and join with off-site drainage along West Valley Parkway. Drainage confluences at the cleanout located at the west corner of West Valley Parkway. Existing runoff from the Modified Project site then discharges to the concrete lined Escondido Creek, which ultimately flows west to the San Elijo Lagoon and discharges to the Pacific Ocean.

Drainage patterns for the post Modified Project conditions would remain similar to the existing drainage patterns, with all drainage flowing to POC-1. Drainage from the Modified Project site would be directed north to a proposed modular wetland system, which treats the runoff prior to discharging it from the site. The off-site drainage surrounding the Modified Project site would remain and be routed in the same manner as the existing conditions—around the development through the existing storm drain conveyance system. The proposed modular wetland system would tie into the existing curb inlet north of the Modified Project site and convey flows through the existing conveyance system along West Valley Parkway. Flows confluence at POC-1, at the cleanout located along the west corner of West Valley Parkway. Runoff from the Modified Project site then discharges to the concrete lined Escondido Creek, which ultimately flows west to the San Elijo Lagoon and discharges to the Pacific Ocean. As shown in Table 4, the post Modified Project condition would reduce peak flows during the 100-year storm event from 17.9 cubic feet per second (cfs) to 17.8 cfs. Therefore, the Modified Project would not result in substantial erosion or siltation on- or off-site. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

Table 4 Pre- and Post-Modified Project Hydrologic Conditions (cubic feet per second)						
Drainage Basin	POC	Return Period (years)	Modified Project Condition	Tributary Area (acres)	Time of Concentration (minutes)	Q (cfs)
100	1	100	Pre-Modified Project	3.7	9.7	17.9
			Post-Modified Project		7.2	17.8

POC = point of compliance; cfs = cubic feet per second; Q = discharge
SOURCE: Attachment 6

4. Flooding

Approved Project

The Final EIR determined that development of future land uses as designated in the General Plan Update would have the potential to result in substantial alteration of existing drainage patterns and increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site during after construction activities. Additionally, implementation of the E-CAP could result in the alteration of drainage patterns during and after construction activities associated with the development of transit or roadway facilities. However, existing policies and regulations, as well as implementation of the proposed General Plan Update policies, would reduce any potentially significant impacts associated with flooding to a less than significant level.

Modified Project

As shown in Table 4, the post Modified Project condition would reduce peak flows during the 100-year storm event from 17.9 cfs to 17.8 cfs. Therefore, the Modified Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Exceed Capacity of Stormwater Systems

Approved Project

The Final EIR determined that development of future land uses as designated in the proposed General Plan Update and Downtown Specific Plan Update, and development of roadway and transit facilities encouraged under the E-CAP, would have the potential to contribute runoff in a manner that would exceed existing stormwater drainage facilities. Compliance with existing policies and regulations, and implementation of the proposed General Plan Update policies, would reduce impacts to stormwater systems to a less than significant level. Therefore, the Approved Project would result in a less than significant impact associated with the exceedance of stormwater drainage system capacity.

Modified Project

As shown in Table 4, the post Modified Project condition would reduce peak flows during the 100-year storm event from 17.9 cfs to 17.8 cfs. Therefore, the Modified Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

6. Housing within a 100-year Flood Hazard Area

Approved Project

The Final EIR determined that development of future land uses as designated in the Approved Project would result in the placement of housing within flood hazard areas. Compliance with existing regulations, and implementation of the proposed General Plan Update policies, would reduce impacts associated with the placement of housing in flood hazard areas to a less than significant level. Furthermore, the measures identified in the E-CAP would not result in the placement of housing within a flood hazard area. Therefore, the Approved Project would result in a less than significant impact associated with housing in flood hazard areas.

Modified Project

As identified in Figure 4.9-3 in the Final EIR, the Modified Project site is not located within a 100-year flood hazard area. Therefore, the Modified Project would not develop housing within a 100-year flood hazard area. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

7. Dam Inundation and Flood Hazards

Approved Project

The Final EIR determined that development of future land uses as designated in the Approved Project would result in the potential to expose people or structures to a significant risk of loss, injury or death involving flooding as a result of a levee or dam failure, by placing persons or housing in areas that could experience dam inundation from the failure of Lake Wohlford and Lake Dixon Dams. Implementation of the E-CAP would have no impact related to exposing people or structures to a significant risk of loss, injury or death involving flooding. However, compliance with the County's Multi-Jurisdictional Hazard Mitigation Plan, the Lake Dixon and Lake Wohlford Dam Emergency Action Plans, and implementation of the policies proposed within the General Plan Update would reduce impacts associated with dam inundation and flood hazards to a less than significant level.

Modified Project

As identified in Figure 4.9-2 in the Final EIR, the Modified Project site is located within the Lake Wohlford Dam Failure Inundation Area and the Dixon Lake Dam Failure Inundation Area. Like the Approved Project, the Modified Project would be required to comply with the County's Multi-Jurisdictional Hazard Mitigation Plan, the Lake Dixon and Lake Wohlford Dam Emergency Action Plans, and implementation of the policies proposed within the General Plan Update. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

8. Seiche, Tsunami, and Mudflow Hazards

Approved Project

The Final EIR determined that due to the inland location of the Approved Project, implementation of the proposed General Plan Update would not expose people or structures to hazards associated with inundation by a tsunami. Therefore, impacts associated with a tsunami would be less than significant. Additionally, implementation of the General Plan Update would not result in land uses or development within areas subject to inundation from a seiche. However, implementation of the General Plan Update would locate land uses and development in areas that would be considered susceptible to mudflows. Compliance with existing regulations and implementation of General Plan Update Soils and Seismicity Policy 7.3 would reduce impacts associated with mudflows to a less than significant level.

Modified Project

Like the Approved Project, the Modified Project would not expose people or structures to hazards associated with inundation by a tsunami or seiche. The Modified Project site is currently developed and surrounded by urban development. Construction of the Modified Project would displace soils which could temporarily increase the potential for mudflow hazards. However, the Modified Project would implement construction BMPs consistent with the requirements of the City’s Storm Water Design Manual, which would minimize erosion. Thus, the Modified Project site would not be susceptible to mudflows. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.10 Land Use and Planning

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Physical Divisions of an Established Community	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Conflicts with Land Use Plans, Policies, and Regulations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Conflicts with HCPs or NCCPs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**1. Physical Division of an Established Community***Approved Project*

The Approved Project does not propose any new roadways or other specific features that would divide an established community. Growth under the General Plan Update would be concentrated within the 15 study areas and would not substantially change physical development patterns in established communities. Additionally, changes to the circulation system within established communities would enhance accessibility within the community. Development standards in the General Plan Update would ensure that new development would not preclude future development as long as it is consistent with the proposed land use plan. Additionally, General Plan Update policies promote connectivity and compatibility with existing neighborhoods. Therefore, impacts associated with the physical division of an established community would be less than significant.

Modified Project

The Modified Project site is developed with a parking lot and surrounded by urban development. The Modified Project would construct 128 multi-family units and would not affect the surrounding land use pattern. Similarly, the Modified Project would not alter the existing circulation network. The Modified Project would connect to existing utilities that are adjacent to the Modified Project site and are already serving the surrounding development. Therefore, the Modified Project would not physically divide an established community. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Conflicts with Land Use Plans, Policies, and Regulations*Approved Project*

The Final EIR determined that the Approved Project would not result in conflicts with applicable land use plans, policies, and regulations. Impacts related to the General Plan Update, Downtown Specific Plan Update, and E-CAP would be less than significant.

Modified Project

The Modified Project site is designated as Downtown Specific Plan (SPA 9) in the City's General Plan. The Downtown Specific Plan is planned to accommodate up to 5,275 residential units. The Modified Project site is located within the Historic District of the Downtown Specific Plan which allows for 78 dwelling units (75 dwelling units per one acre). The Modified Project would consist of a SPA to the Downtown Specific Plan to remove the ground-floor retail component and increase the allowed building height from 60 feet to 65 feet and the number of stories from four to five. Additionally, the Modified Project would utilize the City's Density Transfer Program to transfer 50 units to the Modified Project site from underutilized sites within the Downtown Specific Plan to allow for the construction of 128 multi-family units. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would not

result in conflicts with applicable land use plans, policies, and regulations. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Conflicts with HCPs or NCCPs

Approved Project

The Final EIR determined that the Approved Project would not result in potentially significant impacts associated with the physical division of an established community or conflicts with local plans, policies, regulations, or applicable HCPs and NCCPs.

Modified Project

The Modified Project site is developed with a parking lot and does not contain native habitat on-site. Thus, implementation of the Modified Project would not result in impacts to HCPs or NCCPs. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.11 Mineral Resources

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Mineral Resource Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Mineral Resource Recovery Sites	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Mineral Resource Availability

Approved Project

The Final EIR determined that the Approved Project area is developed with land uses that limit the availability of mineral resources. Additionally, only a small portion of the Approved Project area has been designated as containing known mineral resources of value. Implementation of the Approved Project does not propose land uses that would substantially limit the future availability of known mineral resources. Therefore, the Approved Project would result in a less than significant impact associated with the availability of mineral resources.

Modified Project

As discussed in Section 4.11 of the Final EIR, the City does not designate any mineral resources of value in the City. Furthermore, the Modified Project site is developed with a parking lot and surrounded by urban uses. Therefore, the Modified Project would not result in the loss of mineral resource availability. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Mineral Resource Recovery Sites

Approved Project

The Final EIR determined that the Approved Project would not result in the development of land uses that would result in the loss of availability of any mineral resource recovery sites. Therefore, the Approved Project would result in a less than significant impact associated with mineral resources recovery sites.

Modified Project

The Modified Project site is developed with a parking lot and surrounded by urban uses. Therefore, the Modified Project would not result in the loss of mineral resource recovery sites. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.12 Noise

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Excessive Noise Levels	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Excessive Groundborne Vibration	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Permanent Increase in Ambient Noise Levels	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Temporary Increase in Ambient Noise Levels	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Excessive Noise Exposure from Airports	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the Noise Analysis prepared by RECON Environmental, Inc. (Attachment 7).

1. Excessive Noise Levels*Approved Project*

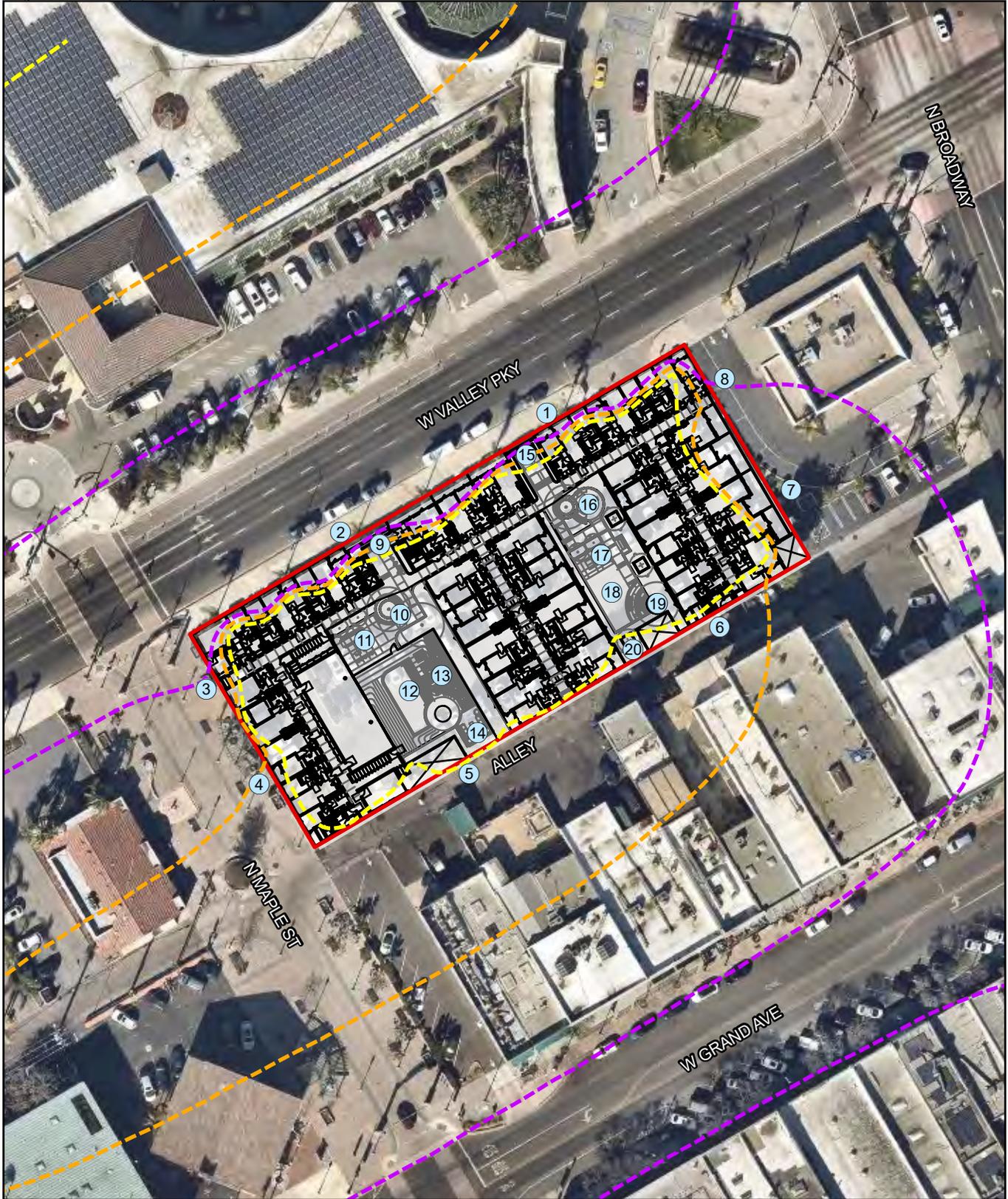
The Final EIR determined that future development under the Approved Project would have the potential to expose noise-sensitive land uses and new commercial, office, and industrial land uses to excessive noise levels from existing roadway noise and noise related to existing commercial, industrial, and extractive land uses, and the Palomar Energy Center power plant. However, compliance with existing regulations such as the Noise Ordinance, and implementation of the proposed General Plan goals and policies, including Noise Policies 5.1 through 5.4 and the Noise Compatibility Guidelines, would reduce impacts to below a level of significance. Therefore, impacts associated with noise compatibility would be less than significant.

Modified Project

Noise impacts associated with the Modified Project are analyzed in the Noise Analysis (see Attachment 7). The results are summarized below.

Noise and land use compatibility is regulated by the Noise Element of the General Plan. Multi-family land uses are “normally acceptable” with noise levels up to 65 community noise equivalent level (CNEL), “conditionally acceptable” with noise levels from 60 to 70 CNEL, “normally unacceptable” with noise levels from 70 to 75 CNEL, and “clearly unacceptable” with noise levels above 75 CNEL. These noise level standards are applied at multi-family recreation areas and are not normally applied to balconies or patios.

Vehicle traffic noise level contours across the Modified Project site were calculated using SoundPLAN. These contours take into account shielding provided by the proposed buildings. Because the exterior use areas associated with the Modified Project are located on the second floor, noise contours were modeled at the second floor elevation. Noise levels were also modeled at specific second-floor exterior use area receivers as well as at a series of first- through fifth-floor receivers located around the building façade. Vehicle traffic noise contours and receiver locations are shown in Figure 5. The results are summarized in Table 5.



Project Boundary	Vehicle Traffic Noise	0 Feet 80	
Site Plan	60 CNEL		
Receivers	65 CNEL		
	70 CNEL		

FIGURE 5
Vehicle Traffic Noise Contours

Receiver	Location	1 st Floor	2 nd Floor	3 rd Floor	4 th Floor	5 th Floor
1	Northern Building Façade	75	74	73	72	71
2	Northern Building Façade	75	74	73	71	70
3	Western Building Façade	68	70	70	68	68
4	Western Building Façade	62	64	65	66	66
5	Southern Building Façade	59	60	61	62	63
6	Southern Building Façade	62	64	65	66	66
7	Eastern Building Façade	65	67	69	69	69
8	Eastern Building Façade	70	71	71	70	70
9	Seating Area	--	64	--	--	--
10	Barbecue Area	--	53	--	--	--
11	Barbecue Area	--	52	--	--	--
12	Pool	--	56	--	--	--
13	Pool	--	55	--	--	--
14	Pool	--	59	--	--	--
15	Seating Area	--	65	--	--	--
16	Barbecue/Dining Area	--	51	--	--	--
17	Open Space	--	53	--	--	--
18	Lawn and Game Area	--	57	--	--	--
19	Lounge	--	58	--	--	--
20	Seating Area	--	61	--	--	--

CNEL = community noise equivalent level
SOURCE: Attachment 7.

As shown in Table 5, exterior noise levels at the second-floor recreation areas (Receivers 9 through 20) would range from 52 to 65 CNEL. Noise levels would not exceed 65 CNEL and the Modified Project would be compatible with the City's exterior noise level standards. Exterior noise impacts would be less than significant.

Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration's Highway Traffic Noise Analysis and Abatement Guidance, buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 decibels (dB), while light-frame structures with double-glazed windows may provide noise level reductions of 20 to 25 dB (see Attachment 7).

The interior noise level standard for residential uses is 45 CNEL. As shown in Table 5, exterior noise levels at the building façade would be 75 CNEL or less. Because a standard 20 dB reduction provided by standard light-frame construction would not achieve interior noise levels of 45 CNEL or less, a more detailed evaluation of interior noise levels was conducted. The sound transmission class (STC) rating of windows, walls, and roofs is an integer value that rates how well a building component attenuates noise. The STC rating general reflects the dB reduction that a building component can achieve. Because a noise reduction of up to 30 A-weighted decibels [dB(A)] is required to achieve interior noise levels of 45 CNEL or less, building components with an STC rating of up to 30 would be required. Standard walls and roofs typically have STC ratings greater than 40 and would achieve

the required noise reduction. In accordance with City General Plan Policy 5.4, once floor plans and the locations of all window and door components are identified, a final interior noise assessment would be required prior to the issuance of building permits that identifies the exact building components necessary to reduce interior noise levels to the City's standard of 45 CNEL. The preparation of an interior noise study and inclusion of identified window and door components shall be a condition of approval. Therefore, the Modified Project would not expose receivers to interior noise levels in excess of standards established in the General Plan, and impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Excessive Groundborne Vibration

Approved Project

The Final EIR determined that the Approved Project could result in the construction of new land uses and placement of new development in close proximity to the SPRINTER rail line which would have the potential to result in impacts associated with excessive groundborne vibration. General Plan Policy 5.5 requires compliance with the Federal Transit Administration (FTA) vibration criteria. Compliance with this policy would reduce potential groundborne vibration impacts related to future development; however, additional mitigation is necessary to ensure proper setbacks are established. The Final EIR also found that the Approved Project would result in a potentially significant impact related to groundborne vibration during construction that had the potential to damage buildings. The Final EIR identifies **Mitigation Measure Noi-1**, which would reduce construction-related vibration, but not to a less than significant level leaving impacts remaining significant and unmitigated. The Final EIR also identifies **Mitigation Measure Noi-2**, which would reduce vibration impacts from the SPRINTER to a less than significant level.

Modified Project

Human reaction to vibration is dependent on the environment the receiver is in, as well as individual sensitivity. For example, outdoor vibration is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying (see Attachment 7). The FTA damage thresholds indicate that, for buildings not extremely sensitive to vibration, a damage threshold of between 0.2 inches per second (in/sec) peak particle velocity (PPV) to 0.5 in/sec PPV would apply depending on the type of building.

Construction activities produce varying degrees of ground vibration depending on the equipment and methods employed. While ground vibrations from typical construction activities rarely reach levels high enough to cause damage to structures, special consideration must be made when sensitive or historic land uses are near the construction site. Construction activities that typically generate the highest levels of vibration are blasting and impact pile driving. However, the Modified Project would not include blasting or pile driving. The equipment that would be used during construction with the greatest potential to generate vibration would be bulldozers and loaded trucks. According to the FTA, bulldozers and loaded trucks generate vibration levels of 0.089 and 0.076 in/sec PPV at 25 feet, respectively. Vibration levels would exceed 0.2 in/sec PPV at distances of 12 feet or closer from a bulldozer and 10 feet from a loaded truck. The nearest structures are located approximately 20 feet or more from the edge of the Modified Project footprint, therefore, vibration

levels are not anticipated to exceed 0.2 in/sec PPV. Furthermore, construction equipment would not be located immediately adjacent to the building due to physical constraints. Rather, they would be located either on the adjacent roads or on the Modified Project site at distances greater than 10 feet from the adjacent buildings. All other construction equipment operating on-site would generate vibration levels that are less than a bulldozer. As identified in the Final EIR, the Modified Project would comply with **Mitigation Measure Noi-1** during construction activities. Implementation of **Mitigation Measure Noi-1** would reduce construction vibration impacts to less than significant levels. Once operational, the Modified Project would not be a source of groundborne vibration. Additionally, the Modified Project is not located adjacent to the SPRINTER right-of-way and **Mitigation Measure Noi-2** would not apply. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Permanent Increase in Ambient Noise Levels

Approved Project

Traffic Noise

The Final EIR determined that the future development under the Approved Project would result in potentially significant permanent increases in ambient noise levels due to vehicle traffic at the 2035 planning horizon. General Plan Noise Policy 5.6 requires technical reports to be prepared for future developments that would have the potential to substantially increase ambient noise levels and Noise Policies 5.11 and 5.12 would reduce noise levels from traffic noise. Future development would be subject to the proposed incremental noise impact standards (see Table 2 of the Noise Analysis in Attachment 7). However, implementation of Noise Policy 5.6 would not reduce cumulative impacts to a less than significant level because it cannot be guaranteed that noise levels would be reduced to below the applicable threshold. Mitigation was found to be infeasible, therefore, cumulative impacts associated with future regional roadway traffic noise increases would remain significant and unavoidable.

Operational Noise

The Final EIR determined that new operational noise sources would have the potential to result in substantially permanent increases in noise levels. However, implementation of General Plan Noise Policy 5.6 requires technical reports to be prepared for future developments that would have the potential to substantially increase ambient noise levels. The purpose of the report would be to ensure that adequate sound attenuation from these noise sources would be provided. Additionally, Noise Policies 5.8 and 5.9 include requirements specifically for mixed use development that would reduce noise impacts from these developments. Future development would also be required to comply with the provisions of the City's Noise Ordinance. Compliance with the General Plan standards and policies and the Noise Ordinance would reduce impacts related to permanent increases in ambient noise to a less than significant level.

*Modified Project*Traffic Noise

The Modified Project would increase traffic on West Valley Parkway. The increase in off-site noise levels was calculated using traffic volumes provided in the LMA (see Attachment 2). General Plan Noise Policy 5.3 requires noise attenuation for outdoor spaces in all developments where projected incremental exterior noise levels exceed those shown in General Plan Figure VI-14. The increase in off-site noise levels adjacent to West Valley Parkway are summarized in Table 6.

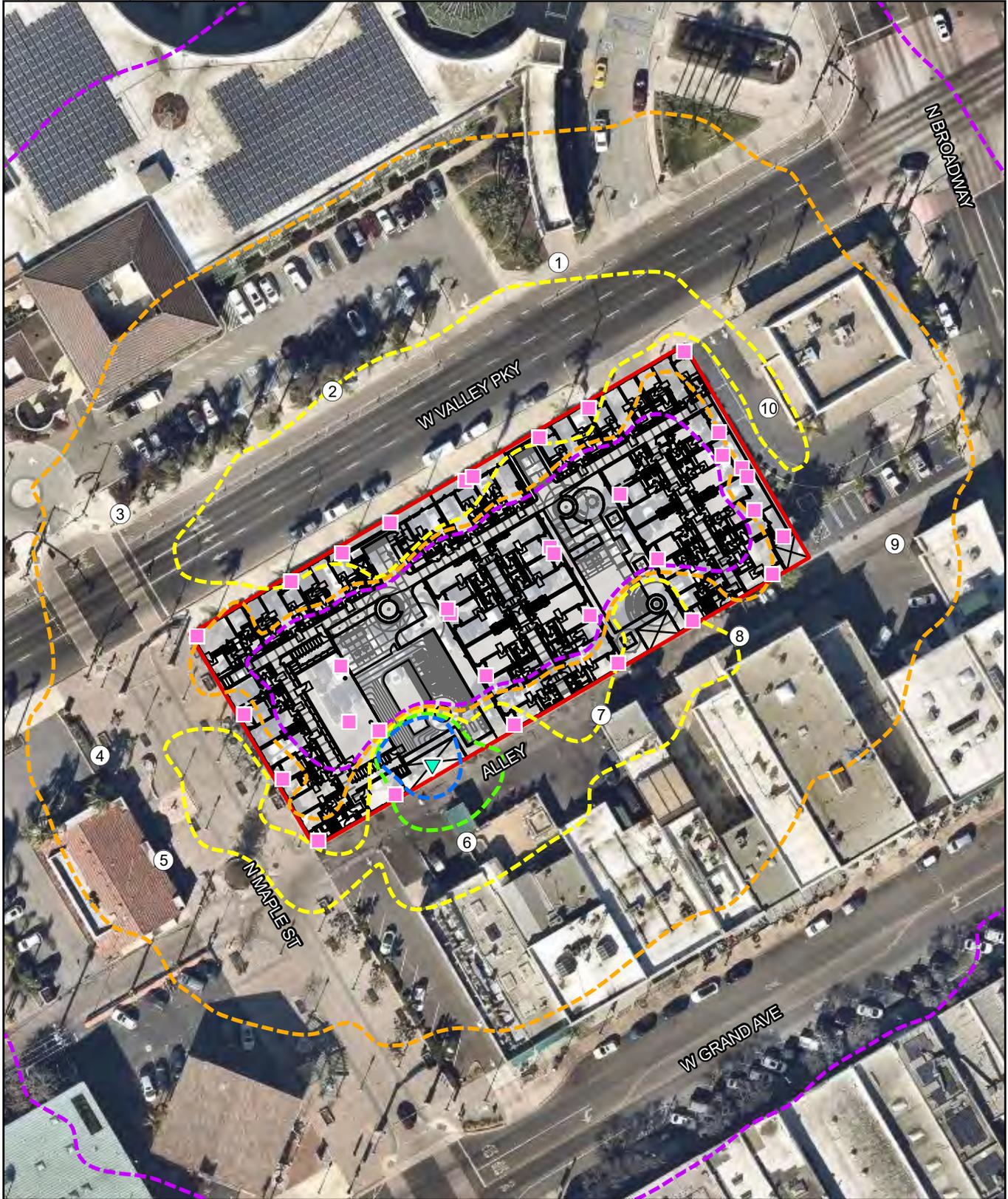
Roadway Segment	Existing CNEL	Near-Term CNEL	Near-Term + Project CNEL	Project Increase over Existing
West Valley Parkway				
Broadway to Escondido Boulevard	69.2	69.5	69.5	0.3
Escondido Boulevard to Centre City Parkway	69.4	69.7	69.8	0.4
CNEL = Community Noise Equivalent Level SOURCE: Attachment 7				

As shown, the Modified Project would result in noise level increases of 0.4 dB or less. The Modified Project would not exceed the allowable noise level increases shown in General Plan Figure VI-14. It should be noted that 3 dB is considered a barely perceptible change in noise levels. Therefore, an increase of 0.4 dB or less would not be an audible change in noise levels. Operational roadway noise would not generate a substantial permanent increase in ambient noise levels for off-site noise sensitive land uses, and impacts would be less than significant. Impacts related to traffic noise would therefore be reduced compared to the Approved Project.

Operational Noise

Operational noise sources on the Modified Project site are anticipated to be typical of any residential neighborhood, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. None of these noise sources associated with residential uses are anticipated to violate the Municipal Code or result in a substantial permanent increase in existing noise levels. The Modified Project would include heating, ventilation, and air conditioning (HVAC) units and boilers. Noise levels due to this mechanical equipment were modeled to determine if they have the potential to produce noise in excess of City limits. The HVAC equipment for the residential units would be split unit condensers which were modeled on each private terrace. The amenity space on the second floor would include two packaged HVAC units. The Modified Project would also include boilers in the ground-floor garage.

Noise levels were modeled at a series of 10 receivers located at the adjacent uses. Modeled receivers and daytime and nighttime operational noise contours are shown in Figures 6a and 6b, respectively. Operational noise levels are summarized in Table 7.

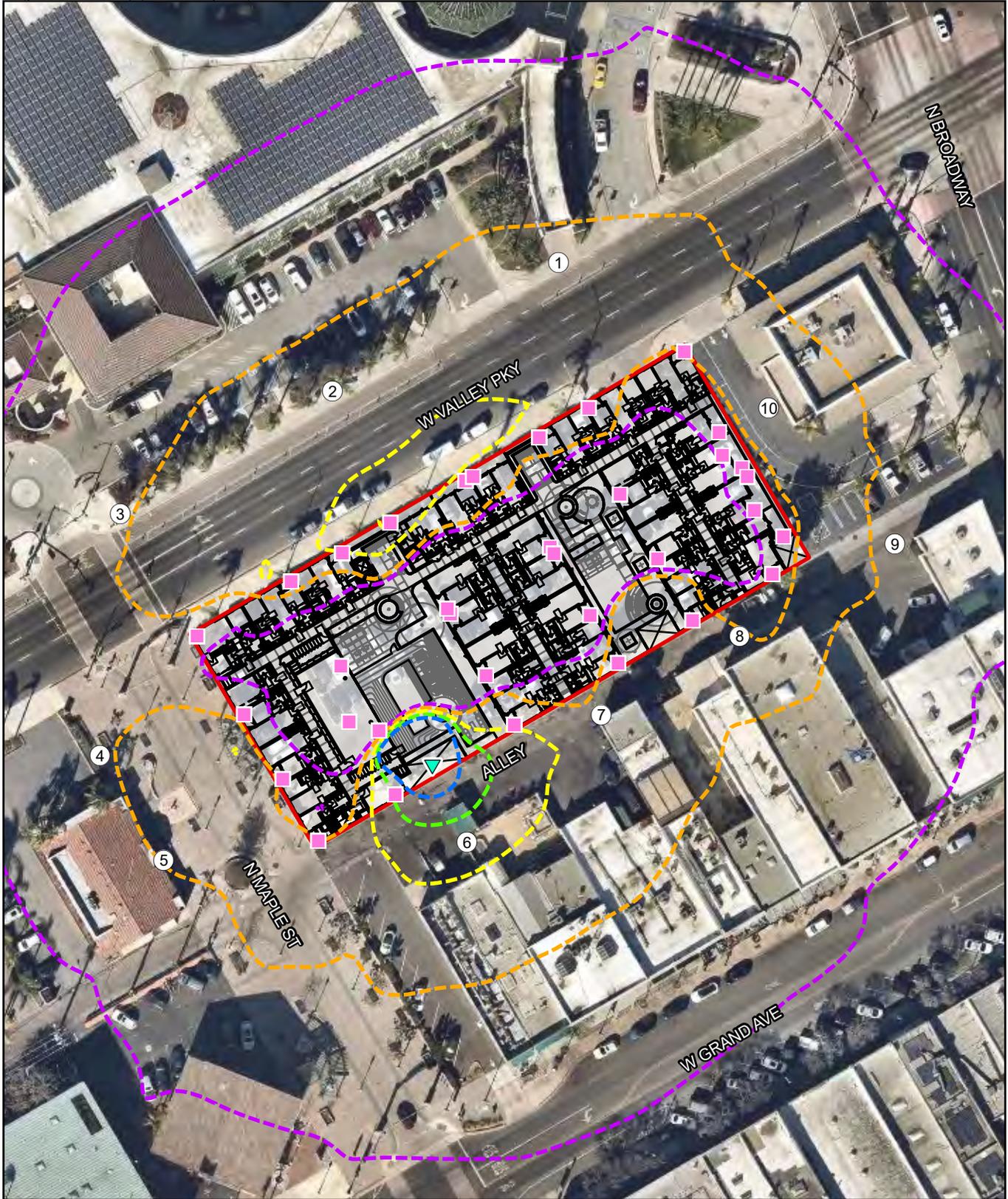


- Project Boundary
- Receivers
- Site Plan
- HVAC
- ▼ Boiler

- Daytime HVAC Noise**
- 40 dB(A) L_{eq}
 - 45 dB(A) L_{eq}
 - 50 dB(A) L_{eq}
 - 55 dB(A) L_{eq}
 - 60 dB(A) L_{eq}



FIGURE 6a
Daytime Operational
Noise Contours



- Project Boundary
- Receivers
- Site Plan
- HVAC
- ▼ Boiler

- Nighttime HVAC Noise**
- 40 dB(A) L_{eq}
 - 45 dB(A) L_{eq}
 - 50 dB(A) L_{eq}
 - 55 dB(A) L_{eq}
 - 60 dB(A) L_{eq}



FIGURE 6b
Nighttime Operational
Noise Contours

Table 7 Operational Noise Levels at Adjacent Receivers [dB(A) L_{eq}]			
Receiver	Land Use	HVAC Noise Level	
		Daytime	Nighttime
1	City Hall	49	46
2	City Hall	50	47
3	City Hall	48	45
4	Commercial	48	45
5	Commercial	48	45
6	Commercial	53	52
7	Commercial	49	47
8	Commercial	48	45
9	Commercial	47	44
10	Commercial	51	48

dB(A) L_{eq} = A-weighted decibels equivalent noise level.
SOURCE: Attachment 7

As shown, daytime operational noise levels would range from 47 to 53 dB(A) L_{eq} at the adjacent property lines and nighttime noise levels would range from 44 to 52 dB(A) L_{eq} . Noise levels would not exceed the City's daytime and nighttime commercial noise level limits of 60 and 55 dB(A) L_{eq} , respectively. Therefore, operational noise would not generate a substantial permanent increase in ambient noise levels in excess of limits established in the Municipal Code, and impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

4. Temporary Increase in Ambient Noise Levels

Approved Project

The Final EIR determined that future development under the Approved Project would have the potential to result in temporary increases in ambient noise levels due to construction of new land uses and infrastructure. However, future construction activities would be required to implement construction measures to meet the noise level limit established in the City's Noise Ordinance, such as noise barriers or construction methods as recommended in General Plan Noise Policy 5.7. The Noise Ordinance also limits the hours of construction so that construction activities would not result in sleep disturbance. Therefore, compliance with the Noise Ordinance would reduce the Approved Project's construction-related noise impacts to a less than significant level.

Modified Project

Noise level limits for construction activities are established in Sections 17-234 and 17-238 of the Municipal Code, which state that no construction equipment shall exceed a one-hour average sound level limit of 75 dB(A) L_{eq} . In addition, Section 17-234 states that construction activities are only permitted between 7:00 a.m. and 6:00 p.m. Monday through Friday, and 9:00 a.m. and 5:00 p.m. on Saturdays. Section 17-238 states that grading activities are only permitted between 7:00 a.m. and

6:00 p.m. Monday through Friday, and provided a variance has been obtained in advance from the City Manager, between 10:00 a.m. and 5:00 p.m. on Saturday.

The Modified Project site is bounded by commercial and institutional uses. The nearest sensitive land uses are the residential uses located approximately 450 feet northeast of the Modified Project site. Noise associated with construction was modeled at a series of 10 receivers located at the adjacent properties. The results are summarized in Table 8. Construction noise contours are shown in Figure 7.

Table 8 Construction Noise Levels at Adjacent Receivers [dB(A) L_{eq}]		
Receiver	Land Use	Construction Noise Level
1	City Hall	69
2	City Hall	70
3	City Hall	68
4	Commercial	68
5	Commercial	68
6	Commercial	72
7	Commercial	75
8	Commercial	75
9	Commercial	69
10	Commercial	75

dB(A) L_{eq} = A-weighted decibels equivalent noise level.
SOURCE: Attachment 7

As shown in Table 8, construction noise levels are anticipated to range from 68 to 75 dB(A) L_{eq} at the adjacent properties. Although the existing adjacent uses would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. In accordance with Sections 17-234 and 17-238 of the Municipal Code, construction activities would not occur before 7:00 a.m. or after 6:00 p.m. on Mondays through Fridays, before 9:00 a.m. or after 5:00 p.m. on Saturdays, and would not occur any time on Sundays and holidays. As construction activities associated with the Modified Project would comply with the requirements of the Municipal Code, impacts associated with temporary increases in noise levels during construction would be less than significant. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Excessive Noise Exposure from Airports

Approved Project

The Final EIR determined that future development under the Approved Project would not be located within the 60 CNEL noise contour of any public use airport, Marine Corps Air Station (MCAS) Miramar, or private airstrip. Additionally, development under the Approved Project would not interfere with operations at a public use airport, MCAS Miramar, or private airstrip. Therefore, although areas within the planning boundary would be subject to overflights and periodic aviation noise, residents and workers would not be exposed to excessive noise levels from a public airport, MCAS Miramar, or a private airstrip. Impacts related to noise from airports and airstrips would be less than significant.



- Project Boundary
- Receivers

Construction Noise

- 60 dB(A) L_{eq}
- 65 dB(A) L_{eq}
- 70 dB(A) L_{eq}
- 75 dB(A) L_{eq}



FIGURE 7
Construction Noise Contours

Modified Project

The Modified Project site is not located within the 60 CNEL noise contour of any public use airport, MCAS Miramar, or private airstrip. Like the Approved Project, impacts related to noise from airports and airstrips would be less than significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measure

Noi-1: Construction Vibration Best Management Practices. All general construction activities that take place within 100 feet of a building with the potential to be damaged by excessive vibration, or use pile-driving, blasting, or other high-impact construction equipment within 200 feet of a daytime noise sensitive land use (public and private educational facilities, churches, libraries, museums, cultural facilities, golf courses and passive recreational parks) shall implement the following construction BMPs recommended by the Federal Railroad Administration in the High Speed Ground Transportation Noise and Vibration Impact Assessment (2005):

1. Sequence of operations:
 - a. Phase demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period.
2. Alternative construction methods:
 - a. Avoid impact pile driving where possible in vibration-sensitive areas. Drilled piles or the use of a sonic or vibratory pile driver causes lower vibration levels where the geological conditions permit their use.
 - b. Select demolition methods not involving impact, where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower vibration levels than impact demolition by pavement breakers, and milling generates lower vibration levels than excavation using clam shell or chisel drops.
 - c. Avoid vibratory rollers and packers near sensitive areas

4.13 Population and Housing

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Population Growth	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Displacement of Housing and People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Population Growth

Approved Project

The Final EIR determined that development and infrastructure proposed under the General Plan Update would directly and indirectly induce population growth; however, this growth is consistent with forecasted growth for the City. The General Plan Update is a comprehensive plan to guide future growth and includes a framework for land use and development, as well as goals and policies to prevent unanticipated or inappropriate population growth in the Approved Project area. Growth identified in the Downtown Specific Plan Update would be consistent with the proposed General Plan Update. Additionally, the E-CAP would not result in any new development, changes in population, or the construction of facilities that would propose land use changes beyond those identified in the General Plan Update and Downtown Specific Plan Update. Therefore, the Approved Project would not result in the direct or indirect inducement of unplanned population growth and a significant impact would not occur.

Modified Project

The Modified Project would utilize the City's Density Transfer Program to transfer 50 units to the Modified Project site from underutilized sites within the Downtown Specific Plan to allow for the construction of 128 multi-family units. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would not result in the direct or indirect inducement of unplanned population growth. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Displacement of Housing and People

Approved Project

The Final EIR determined that implementation of the General Plan Update land use designations would result in the displacement of up to 142 existing residential dwelling units. Additionally, up to 300 homes and businesses have the potential to be displaced from the expansion or construction of the Approved Project's circulation system. Therefore, the Approved Project would result in the displacement of substantial numbers of existing housing and people, necessitating the construction of replacement housing elsewhere and impacts would be significant. Although compliance with existing regulations, implementation of General Plan Update policies and **Mitigation Measure Pop-1**, which would require the City to coordinate with property owners that would experience displacement, impacts would not be reduced to a less than significant level. The Approved Project's direct impact would remain significant and unavoidable.

Modified Project

The Modified Project site is developed with a parking lot and would construct 128 multi-family units. Therefore, the Modified Project would not displace substantial numbers of existing people or housing and would instead increase housing within the City. Since the Modified Project would not displace people or housing, **Mitigation Measure Pop-1** from the Final EIR would not apply. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.14 Public Services

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Fire Protection Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Police Protection Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. School Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Library Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Fire Protection Services

Approved Project

The Final EIR determined that the Approved Project includes land use designations that would increase population and housing. The population and housing increases projected under the General Plan Update would increase the demand for fire protection agency services. To maintain or achieve acceptable travel time standards for fire protection, the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. However, the construction of new facilities would be subject to separate CEQA review, which would disclose potential environmental impacts, and analyze potential reduction measures. Additionally, multiple General Plan Update policies specifically address fire protection services within the City and are intended to reduce impacts associated with fire protection facilities. Implementation of the General Plan Update policies, including the requirement to comply with CEQA, would reduce impacts related to the construction and expansion of fire protection facilities to a less than significant level. Implementation of the E-CAP would not result in an increase in population or development and would not increase the demand for fire protection services. Therefore, the Approved Project would result in a less than significant impact associated with the construction or expansion of fire protection facilities.

Modified Project

The fire station closest to the Modified Project site is Escondido Fire Department Station 1, located at 310 North Quince Street, approximately 0.2 miles northwest of the Modified Project site. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. As part of the permitting process, the Modified Project would be reviewed by the Escondido Fire Department and the City's Building Department to ensure that the Modified Project meets all relevant fire protection requirements, including response times and personnel availability. In addition, the Modified Project would be required to comply with City fire suppression standards including providing adequate fire access. Furthermore, the Modified Project applicant would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B that are applied to the funding of public facilities, including fire stations, to offset the incremental increase in the demand for fire protection services generated by the Modified Project. Therefore, the Modified Project would not result in the need for new or physically altered fire protection facilities. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

2. Police Protection Services*Approved Project*

The Final EIR determined that the Approved Project would designate areas of increased land use densities in the Approved Project area in order to accommodate projected population growth. The projected population and housing growth would result in a need for increased law enforcement services; however, existing Escondido Police Department facilities are anticipated to be able to accommodate the increased growth without requiring the need for new facilities to maintain levels of service. It is possible that the buildout of the General Plan Update would require the construction of new or expansion of existing County Sheriff Department facilities, the construction of which would potentially result in adverse environmental effects. The construction of any new police facilities would be subject to CEQA review, which would minimize environmental impacts. Additionally, multiple General Plan Update policies specifically address police protection services within the Approved Project boundary and are intended to reduce impacts associated with the provision of new police protection facilities. Implementation of the General Plan Update policies, including compliance with CEQA, would reduce impacts related to police protection facilities to a less than significant level. Implementation of the E-CAP would not result in an increase in population or development within the Approved Project planning area and would not result in an increased demand for police protection services. Therefore, the Approved Project would result in a less than significant impact associated with the construction or expansion of police protection facilities.

Modified Project

The Escondido Police Department headquarters is located at 1163 Centre City Parkway, which is located approximately 1.14 miles northwest of the Modified Project site. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Additionally, construction of the Modified Project would be subject to compliance with

Municipal Code Title 18, Building Code and Regulations, which adopts by reference the CBC. Chapter 33, Safeguards During Construction, of the CBC includes emergency access requirements that would minimize site safety hazards and potential construction-related impacts to police services. Examples of minimization activities would include ensuring construction materials are properly secured overnight. Compliance with existing regulations would ensure impacts on police services during construction are less than significant. Furthermore, the Modified Project applicant would be required to pay development impact fees per Municipal Code Chapter 6 Article 18B that are applied to the funding of public facilities, including police stations, to offset the incremental increase in demand for police protection services generated by the Modified Project. Therefore, the Modified Project would not result in the need for new or physically altered police protection facilities. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

3. School Services

Approved Project

The Final EIR determined that the Approved Project would accommodate increases in population and housing, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required. The construction of these facilities would be subject to CEQA review, which would minimize environmental impacts. Additionally, the proposed General Plan Update includes policies that are intended to reduce impacts associated with provision of school facilities. The implementation of these policies would result in a less than significant impact related to school facilities. Implementation of the E-CAP would not result in an increase in population or development within the General Plan Update planning area and would not increase the demand for school services. Therefore, the Approved Project would result in less than significant impacts related to school facilities.

Modified Project

Because the modified project is a residential development, the Modified Project applicant would be required to pay development impact fees that would help fund ongoing school service and new facilities. Pursuant to SB 50 (Government Code Sections 65995[h], 65996[b], and 65996[h]), fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. The payment of statutorily capped fee amounts provides "full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities" (SB 50). The Escondido Union School District collects residential and commercial developer fees for projects within its service area to support costs of construction and expansion of school facilities. The Modified Project applicant would be required to pay development impact fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h), 65996(b), and 65996(h) in effect at the time of building permit issuance. Therefore, the Modified Project would not result in the need for new or altered school facilities. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Library Services

Approved Project

The Final EIR determined that the Approved Project would accommodate increases in population and housing, which would result in an increase in library demand. To maintain acceptable performance objectives, the construction of new or expanded library facilities would be required. The construction of these facilities would be subject to CEQA review, which would minimize environmental impacts. Additionally, the proposed General Plan Update includes policies that are intended to reduce impacts associated with the provision of library facilities. Compliance with CEQA and implementation of applicable General Plan Update policies would result in a less than significant impact related to library facilities. Implementation of the E-CAP would not result in an increase in population or development within the General Plan Update planning area and would not increase the demand for library services. Therefore, the Approved Project would result in a less than significant impact related to library facilities.

Modified Project

As discussed in Section 4.14 of the Final EIR, the City does not currently meet the quality of life standards assigned to library services; however, the General Plan recommends expanding the City's existing library facilities to meet the needs of its expanding population. Specifically, to meet the proposed quality of life standards identified within the General Plan Update, the Escondido Public Library would need to provide the following by 2035: 79 staff, 420,000 collection items, and 102,333 square feet of facility space. Consistent with General Plan Update policies focused on library services, the City will continue to improve library staffing, inventory, and programs to meet its goal. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Furthermore, the Modified Project would be required to pay development impact fees that are applied to the funding of public facilities, including libraries, to offset the incremental increase in demand for library services generated by the Modified Project. Therefore, the Modified Project would not result in the need for new or altered library facilities. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.15 Recreation

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Deterioration of Parks and Recreational Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Construction of New Recreational Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Deterioration of Parks and Recreational Facilities

Approved Project

The Final EIR determined that implementation of the Approved Project would have the potential to result in the deterioration of recreational facilities throughout the Approved Project area. Increases in population and development would result in an increased use of recreational facilities, which would have the potential to result in the deterioration of existing facilities. Additionally, the forecasted increase in population in areas that do not currently have adequate local recreational facilities would have the potential to accelerate the deterioration of existing facilities from intensified overuse. However, implementation of existing regulations, the proposed General Plan Update and Downtown Specific Plan Update policies and E-CAP measures would reduce impacts associated with deterioration of parks and recreational facilities to below a level of significance. Furthermore, implementation of the E-CAP would not result in significant impacts related to the deterioration of parks and recreational facilities. Therefore, the Approved Project would result in a less than significant impact associated with the deterioration of parks and recreational facilities.

Modified Project

The Modified Project would utilize the City’s Density Transfer Program to transfer 50 units to the Modified Project site from underutilized sites within the Downtown Specific Plan to allow for the construction of 128 multi-family units. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Consequently, the Modified Project would not substantially increase demand for local parks and recreational facilities. Additionally, the inclusion of on-site recreational facilities including a pool, barbecue/dining area, lounge, fitness center, co-working area, and lawn and game area would reduce usage of local and regional parks and recreational facilities. Furthermore, per Municipal Code Chapter 6 Article 18B, the Modified Project applicant would be required to pay development impact fees that would be applied to the funding of public parks to offset the incremental increase in demand for parks generated by the Modified Project. Therefore, the Modified Project would not result in a substantial increase in 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, and impacts would be less than

significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

2. Construction of New Recreational Facilities

Approved Project

The Final EIR determined that the General Plan Update and Downtown Specific Plan Update do not specifically plan or site new recreational facilities; however, land uses under the General Plan Update and Downtown Specific Plan Update would allow for the development of future recreational facilities, including parks, trails, athletic fields, and community centers. Additionally, the E-CAP supports the development of facilities within the City’s Bicycle Master Plan. The construction of new recreational facilities or expansion of existing facilities would have the potential to result in physical environmental effects. Implementation of existing regulations, the proposed General Plan Update and Downtown Specific Plan Update policies and E-CAP measures would reduce the potentially significant impact associated with the construction of new recreational facilities to a less than significant level.

Modified Project

The Modified Project would include on-site recreational facilities including a pool, barbecue/dining area, lounge, fitness center, co-working area, and lawn and game area. These amenities would be located entirely within the Modified Project site. Consequently, potential impacts associated with proposed on-site recreation facilities have been considered within this Addendum. Therefore, the Modified Project would not have an adverse physical effect on the environment due to the construction or expansion of recreational facilities. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.16 Transportation and Traffic

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Traffic and Level of Service Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Air Traffic	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Road Safety	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Emergency	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Alternative Transportation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

The Modified Project analysis in this section is based on the Local Mobility Analysis prepared by RICK Engineering Company (see Attachment 2).

1. Traffic and LOS Standards

Approved Project

The Final EIR utilized Level of Service (LOS) as the metric for determining significant. It was determined that implementation of the General Plan Update would result in 14 deficient roadway segments and seven deficient intersections throughout the Approved Project area. This would result in a significant direct and cumulative impact. Implementation of the proposed General Plan Update policies and **Mitigation Measures Tra-1** through **Tra-12**, in addition to compliance with applicable regulations, would reduce nine traffic impacts to a less than significant level. However, 11 roadway segments and intersection impacts would remain significant because mitigation for these impacts was determined to be infeasible by the City. Therefore, the Approved Project would result in significant and unavoidable traffic and LOS impacts.

Modified Project

Consistent with the analysis requirements of Section 15164 of the CEQA Guidelines, the evaluation of traffic utilizes the LOS metric to allow an equivalent comparison of potential impacts. The Modified Project site is developed with a parking lot that currently generates vehicular trips. As discussed in the LMA (see Attachment 2), the results of the intersection LOS analysis showed that the study intersections currently operate at LOS C or better during the AM and PM peak hours and would continue to operate at LOS C or better during the peak hours under Near-Term conditions without and with the Modified Project. The City has a design objective of LOS D or better for intersection operations per Street Network Policy 7.3 of the City's General Plan Mobility and Infrastructure Element. Therefore, implementation of the Modified Project would result in a reduced impact compared to the Approved Project because all intersections would continue to operate at acceptable levels.

The results of the roadway segment analysis showed that the study segments of Valley Parkway currently operate at LOS C or better based on the daily traffic volumes and capacity of the functional roadway classification per the City's General Plan Mobility and Infrastructure Element. The roadway segment analysis results also showed that the study segments of Valley Parkway are expected to continue to operate at LOS C or better under Near Term conditions without and with the Modified Project. The City has a design objective of LOS D or better for daily roadway segment operations per Street Network Policy 7.3 of the City's General Plan Mobility and Infrastructure Element. Consequently, LOS of the study roadway segments with the addition of project traffic would comply with the City's General Plan LOS policy. Therefore, implementation of the Modified Project would result in a reduced impact compared to the Approved Project because all roadway segments would continue to operate at acceptable levels. Since the Modified Project would not result in LOS impacts, **Mitigation Measures Tra-1** through **Tra-12** from the Final EIR would not apply, and impacts associated with the Modified Project would be reduced in comparison to the Approved Project.

Since certification of the Approved Project, the CEQA Guidelines were amended and the metric used to evaluate transportation impacts changed from LOS to VMT. As the above analysis demonstrates, these changes to the CEQA guidelines do not represent effects that were not examined in the Final EIR nor new information that could result in new impacts that were not previously evaluated in the Final EIR. Furthermore, the LMA (see Attachment 2) determined that the Modified Project would be screened out from requiring a VMT analysis since it is in a transit-accessible area and a VMT efficient area. Therefore, the Modified Project would not result in VMT impacts.

2. Air Traffic

Approved Project

The Final EIR determined that the Approved Project would not alter existing air traffic patterns or locations and, therefore, impacts to air traffic patterns would be less than significant.

Modified Project

Like the Approved Project, the Modified Project would not alter existing air traffic patterns or locations. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

3. Road Safety

Approved Project

The Final EIR determined that implementation of the General Plan Update would result in increased traffic on roadways with horizontal and vertical curves that are sharper than existing standards. In addition, the Approved Project could result in increased traffic on roadways that are also used by slow moving agricultural vehicles. However, compliance with existing regulations, in addition to implementation of the proposed General Plan Update and Downtown Specific Plan Update policies and E-CAP reduction measures, would reduce road safety impacts to below a level of significance.

Modified Project

The Modified Project would not alter the existing circulation network. Vehicular access to the Modified Project site would be via one driveway on West Valley Parkway which is the same location as the existing public parking lot driveway. Therefore, the Modified Project would not result in increased traffic on roadways with horizontal and vertical curves that are sharper than existing standards. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

4. Emergency Access

Approved Project

The Final EIR determined that under the General Plan Update, construction activities, new development and private roadways have the potential to impair emergency access. However, compliance with existing regulations, in addition to implementation of the proposed General Plan Update policies and Downtown Specific Plan Update policies would reduce impacts to a less than significant level. Additionally, implementation of the E-CAP would reduce roadway congestion which would result in increased emergency response and evacuation access in the event of an emergency. Therefore, the Approved Project would result in a less than significant impact to emergency access.

Modified Project

The Modified Project would not alter the existing circulation network. Vehicular access to the Modified Project site would be via one driveway on West Valley Parkway which is the same location as the existing public parking lot driveway. Additionally, all construction activities would be required to comply with the City's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the Modified Project would not result in inadequate emergency access. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Alternative Transportation

Approved Project

The Final EIR determined that implementation of Approved Project would create provisions for alternative modes of transportation, including multi-modal transit stations, bike lanes, bus stops, trails, and sidewalks. Additionally, the E-CAP contains a variety of reduction measures that promote alternative transportation within the Approved Project area. Many policies proposed in the General Plan Update would require coordination between the City and the agencies responsible for public transportation planning, including SANDAG. Therefore, compliance with existing regulations, in addition to implementation of the proposed General Plan Update and Downtown Specific Plan Update policies and E-CAP reduction measures would ensure impacts related to alternative transportation would be less than significant.

Modified Project

As discussed in the LMA (see Attachment 2), the nearest major transit stop to the Modified Project site is located approximately 0.2 miles east along West Valley Parkway. In addition, 10-to-14-foot-wide sidewalks are currently provided on West Valley Parkway in the immediate vicinity of the Modified Project site, with enhanced crosswalks across West Valley Parkway at Maple Street on the northwest corner of the Modified Project site. Furthermore, the Modified Project site is located across West Valley Parkway from the Escondido Creek Trail, which runs along the west side of Broadway north of West Valley Parkway, and along the north side of West Valley Parkway from Broadway to Centre City Parkway as a Class IV separated bikeway. The Escondido Creek Trail runs

along the west side of Centre City Parkway north of West Valley Parkway as a Class I bike path and continues west along Escondido Creek. Class II bike lanes are also currently provided along Centre City Parkway. Implementation of the Modified Project would not alter existing alternative transportation. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

4.17 Utilities and Service Systems

Issue	New Potentially Significant Impact	New Mitigation Required	No New Impact/ No Impact	Reduced Impact
1. Wastewater Treatment Requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. New Water or Wastewater Treatment Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sufficient Stormwater Drainage Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Adequate Water Supplies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Adequate Wastewater Supplies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Sufficient Landfill Capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Solid Waste Regulations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Energy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

1. Wastewater Treatment Requirements

Approved Project

The Final EIR determined that buildout of the General Plan Update would potentially require the expansion of the existing HARRF or the construction of a new wastewater treatment facility to serve the growth anticipated in the Approved Project area. Implementation of the E-CAP reduction strategies may also result in a small increase in wastewater treatment demand. If new or expanded wastewater facilities are not provided to serve new development under the General Plan Update, a violation in wastewater treatment standards would occur. However, multiple regulations and proposed General Plan Update policies relate specifically to the adequate and timely provision of wastewater treatment facilities so that wastewater standards are not violated. Furthermore, the proposed E-CAP contains a number of reduction measures that would promote water conservation, which would subsequently reduce wastewater treatment demand. Implementation of proposed General Plan Update policies, E-CAP reduction measures and compliance with existing regulations would reduce impacts related to wastewater treatment requirements to below a level of significance.

Therefore, the Approved Project would not result in a significant impact associated with wastewater treatment requirements.

Modified Project

The City updated the Wastewater Treatment Master Plan in 2012 to accommodate the buildout of the General Plan Update. Wastewater treatment services for the Modified Project would be provided by the HARRF operated by the City. The facility is designed to treat wastewater flow of 18 million gallons per day (MGD), operating 24 hours a day (City of Escondido 2025a). The average daily flow is 12.7 MGD, consisting of the City's flow of 9.7 MGD and the City of Rancho Bernardo's flow of 3.0 MGD. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would be consistent with the growth assumptions utilized to forecast wastewater demand for the HARRF operated by the City. Consequently, the Modified Project would not require relocation or construction of new or expanded off-site wastewater facilities.

As addressed in the Will Serve Letter provided by the City (Attachment 8), the Modified Project would connect to existing public sewer lines and is inside the City's sewer service area. Consequently, potential impacts associated with the construction of proposed on-site wastewater facilities have been considered within this Addendum. Therefore, the Modified Project would not require construction of off-site wastewater facilities or expansion of existing facilities. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

2. New Water or Wastewater Treatment Facilities

Approved Project

The Final EIR determined that development of future land uses as designated in the General Plan Update and Downtown Specific Plan Update would have the potential to require or result in the construction of new or expanded water, wastewater or recycled water facilities, the construction of which would have the potential to cause significant environmental effects, such as air quality, biological resources, cultural resources, noise, and hydrology and water quality. Additionally, the E-CAP measures may contribute to increased demand for water and wastewater services, which could ultimately require the construction or expansion of new water, wastewater or recycled water facilities. Subsequent CEQA review would be required in the event new water, wastewater, or recycled water facilities are constructed or expanded, which would disclose potential impacts and propose reduction measures for any significant impacts associated with the new facilities. Additionally, multiple General Plan Update policies are proposed which would reduce the need to construct new water, wastewater, or recycled water facilities and reduce associated environmental impacts. Furthermore, the proposed E-CAP contains several reduction measures that would promote water conservation, which would subsequently reduce the demand for water and wastewater and their associated treatment facilities. Implementation of proposed General Plan Update policies, E-CAP reduction measures and compliance with existing regulations would reduce the Approved Project's impacts related to the expansion or construction of new water, wastewater or recycled water facilities to a less than significant level.

*Modified Project*Water

Water services would be provided by the City's Water Division from the Escondido-Vista Water Treatment Plant. The Water Treatment Plant was constructed in 1976 and has a capacity of 75 million gallons a day (City of Escondido 2025b). The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Consequently, the Modified Project would not require relocation or construction of new or expanded off-site water facilities.

As addressed in the Will Serve Letter provided by the City (see Attachment 8), the Modified Project would connect to existing public water lines and is inside the City's water service area. Consequently, potential impacts associated with construction of proposed on-site water facilities have been considered within this environmental document. Therefore, the Modified Project would not require construction of off-site water facilities or expansion of existing facilities, and impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Wastewater

As discussed in Section 4.17.1 above, wastewater treatment services would be provided by the HARRF operated by the City, which is designed to treat wastewater flow of 18 million MGD, operating 24 hours a day. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would be consistent with the growth assumptions utilized to forecast wastewater demand for the HARRF operated by the City. Consequently, sufficient capacity exists to accommodate the Modified Project. Therefore, the Modified Project would not require construction of off-site wastewater facilities or expansion of existing facilities, and impacts would be less than significant. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

3. Sufficient Stormwater Drainage Facilities

Approved Project

The Final EIR determined that development of future land uses as designated in the General Plan Update and Downtown Specific Plan Update would have the potential to increase the amount of impermeable surfaces within the General Plan Update area, thereby increasing stormwater runoff. Implementation of some E-CAP measures may also increase impervious surfaces and associated stormwater runoff. The increase in stormwater runoff would require the construction or expansion of new stormwater facilities to handle the increased runoff flows, which would have the potential to result in significant environmental impacts. The construction of new stormwater facilities would be subject to CEQA review, which would minimize associated environmental impacts. Additionally, multiple General Plan Update policies and one E-CAP measure are proposed that would reduce the need to construct new stormwater drainage facilities and reduce associated environmental impacts. Implementation of these General Plan Update policies, the E-CAP reduction measure and compliance

with existing regulations would reduce impacts related to the construction of new or expanded stormwater facilities to below a level of significance. Therefore, the Approved Project would result in a less than significant impact associated with new or expanded stormwater drainage facilities.

Modified Project

Stormwater facilities in the Modified Project site vicinity are maintained by the City's Utilities Department. As shown in Table 4, the Modified Project would reduce peak flows during the 100-year storm event from 17.9 cfs in the pre-Modified Project condition to 17.8 cfs in the post Modified Project conditions. The Modified Project would achieve this reduction in peak flows by introducing a modular wetland system to treat and detain runoff prior to discharging off-site. Consequently, the Modified Project would not require relocation or construction of new or expanded off-site stormwater facilities. Therefore, the Modified Project would not require the construction of off-site storm water drainage facilities or expansion of existing facilities. No new or more severe impacts would occur as a result of the Modified Project and no new mitigation would be required.

4. Adequate Water Supplies

Approved Project

The Final EIR determined that implementation of the General Plan Update and Downtown Specific Plan Update would result in an increase in housing units to accommodate planned population growth, which would increase demand for water provided by Escondido Water and Wastewater Division (EWWD), Vallecitos Water District (VWD), Vista Irrigation District (VID), Valley Center Municipal Water District (VCMWD) and Rincon Del Diablo Water District (RDD). Implementation of the E-CAP may also result in a slight increase in water demand associated with the construction of transit-related facilities. Although multiple planning documents exist to ensure a reliable water supply is available for future growth, none of the 2010 Urban Water Management Plans account for the growth proposed under the General Plan Update or Downtown Specific Plan Update. Additionally, the Urban Water Management Plans of San Diego County Water Authority, VWD and RDD predict water supply shortages during multiple dry water years until 2035. Although regulations, proposed General Plan Update policies and proposed E-CAP reduction measures would reduce water supply demand, they would not reduce demand to the extent that an adequate water supply would be assured. Therefore, implementation of the Approved Project has the potential to result in a demand for water supply that exceeds existing entitlements and resources, or necessitates new or expanded entitlements. Impacts would be significant. **Mitigation Measure Util-1** would require the EWWD Water Distribution Master Plan to be updated to accommodate the buildout of the General Plan Update. Even with compliance with existing regulations and implementation of the General Plan Update policies and E-CAP reduction measures, and **Mitigation Measure Util-1**, impacts would remain significant and unavoidable.

Modified Project

The City updated the Water Master Plan in 2012 to accommodate the buildout of the General Plan Update. Therefore, **Mitigation Measure Util-1** has been completed and would not apply to the Modified Project. As discussed in Section 4.17.2 above, the Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore

would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would be consistent with the growth assumptions utilized to forecast water supply demand in the City's Water Master Plan. Consequently, the Modified Project would not require relocation or construction of new or expanded off-site water facilities. Therefore, no new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

5. Adequate Wastewater Facilities

Approved Project

The Final EIR determined that development of future land uses as designated in the General Plan Update and Downtown Specific Plan Update would result in increased demand on existing wastewater systems due to increased sewage flows associated with the new development. Some E-CAP measures may also minimally increase wastewater flows within the Approved Project area. An increase in wastewater flows could result in EWWD or VWD having inadequate capacity to serve the projected demand associated with the buildout of the General Plan Update. Multiple regulations and General Plan Update policies would assist in providing adequate wastewater capacity and infrastructure for the growth anticipated under the General Plan Update. Additionally, the proposed E-CAP contains a number of reduction measures that would promote water conservation, which would subsequently reduce wastewater treatment demand. Implementation of the proposed General Plan Update policies, E-CAP reduction measures and compliance with existing regulations would reduce impacts related to inadequate capacity. However, until EWWD's Wastewater Master Plan and VWD's Master Plan is updated to account for growth anticipated under the proposed General Plan Update, impacts would remain significant. Therefore, the Approved Project would result in a potentially significant impact related to adequate wastewater facilities. Implementation of **Mitigation Measure Util-2**, which would require the EWWD Wastewater Master Plan to be updated to accommodate the buildout of the General Plan Update and the City to coordinate with VWD during its next Master Plan Update, would reduce impacts regarding adequate wastewater facilities to a less than significant level.

Modified Project

As discussed in Section 4.17.1 above, the City updated the Wastewater Treatment Master Plan in 2012 to accommodate the buildout of the General Plan Update. Therefore, **Mitigation Measure Util-1** has been completed and would not apply to the Modified Project. Wastewater treatment services would be provided by the HARRF operated by the City, which is designed to treat wastewater flow of 18 million MGD, operating 24 hours a day. The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Therefore, the Modified Project would be consistent with the growth assumptions utilized to forecast wastewater demand for the HARRF operated by the City. Consequently, sufficient capacity exists to accommodate the Modified Project. Therefore, the Modified Project would not exceed existing wastewater treatment capacity. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

6. Sufficient Landfill Capacity

Approved Project

The Final EIR determined that if additional landfills are not constructed and existing landfills are not expanded, the County's Integrated Waste Management Plan Siting Element estimates that the County, including the Approved Project area, would run out of physical landfill capacity by 2016. The horizon year of the General Plan is 2035 and land uses proposed under the General Plan could generate solid waste requiring disposal well beyond the year 2035. Therefore, the development of future land uses as designated in the General Plan Update and Downtown Specific Plan Update would have the potential to be served by landfills with insufficient capacity to accommodate future solid waste disposal needs. Solid waste generated from implementation of E-CAP reduction measures would also be potentially served by landfills with insufficient capacity. While proposed General Plan Update policies, E-CAP reduction measures and existing regulations are intended to provide adequate solid waste disposal facilities for the future and increase waste diversion, unless additional landfill facilities are provided, impacts would remain significant. Until additional solid waste disposal capacity is available to serve buildout of the Approved Project, impacts would remain significant and unavoidable.

Modified Project

Escondido Disposal, Inc. (EDI) provides waste and recycling services to the City. EDI conducts residential waste collection and takes the trash to the Escondido Resource Recovery transfer station, where trash is sorted into recyclable, organics, and refuse. EDI has an extensive program designed to recycle trash consistent with state regulations. AB 341, also called the "Mandatory Commercial Recycling Regulation," requires businesses and multi-family residential dwellings of five units or more, that generate four or more cubic yards of commercial solid waste per week to implement recycling programs, on or after July 1, 2012. The California Integrated Waste Management Act of 1989 (AB 939) emphasizes resource conservation through reduction, recycling, and reuse of solid waste. Waste that cannot be disposed of would likely be deposited at Miramar Landfill. Almost 910,000 tons of trash are disposed of yearly at Miramar Landfill. The landfill spans over 1,500 acres and opened on December 7, 1959, and has since operated in three areas: north, south and west. South Miramar Landfill operated from 1959 to 1973. North Miramar Landfill operated from 1973 to 1983. West Miramar Landfill, which is still in operation today, opened in 1983. According to the California Department of Resources Recycling and Recovery, West Miramar Landfill has a remaining capacity of 11,080,871 tons and is expected to have capacity until January 1, 2031 (California Department of Resources Recycling and Recovery 2025). Therefore, the County has additional landfill capacity since certification of the Approved Project.

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. Construction activities would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. As shown in Attachment 1 to Attachment 1, operation of the Modified Project could potentially generate 94.6 tons of solid waste per year (518 pounds per day), which would be far below the 11,080,871-ton capacity expected for West Miramar Landfill until January 1, 2031. Therefore, the Modified Project

would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure and impacts would be reduced in comparison to the Approved Project.

7. Solid Waste Regulations

Approved Project

The Final EIR determined that development of future land uses designated in the General Plan Update and Downtown Specific Plan Update, and implementation of E-CAP measures, would comply with federal, state, and local statutes and regulations related to solid waste. Additionally, proposed General Plan Update policies and E-CAP measures regarding solid waste disposal would further ensure compliance with applicable regulations. Therefore, impacts associated with solid waste regulations would be less than significant.

Modified Project

All collection, transportation, and disposal of solid waste generated by the Modified Project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50 percent of their solid waste generation into recycling. In addition, the state has set an ambitious goal of 75 percent recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill and AB 1826 is a mandatory organic recycling bill. The County adopted its Integrated Waste Management Plan in 1998, which includes the Countywide Summary Plan, Source Reduction and Recycling Elements, and Non-Disposal Facility Elements for the county and each city in the county. Waste generated by the Modified Project would enter the City's waste stream but would not adversely affect the City's ability to meet the requirements of AB 939, AB 341, or AB 1826, since the Modified Project's waste generation would represent a nominal percentage of the waste created within the City. Therefore, the Modified Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

8. Energy

Approved Project

The Final EIR determined that development of land uses as designated in the General Plan Update and Downtown Specific Plan would require energy for construction and operation, thereby increasing energy demand in the General Plan Update planning area. To accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, which would have the potential to cause significant and unavoidable environmental effects. Implementation of the E-CAP reduction measures would reduce energy consumption, and the subsequent need to construct or expand new energy production and/or transmission facilities. Additionally, multiple General Plan Update policies are proposed to reduce the need to construct new energy facilities and reduce associated environmental impacts. Furthermore, the construction of new energy facilities

would be subject to CEQA review, which would minimize associated environmental impacts. Therefore, the Approved Project would result in a less than significant impact associated with new or expanded energy facilities.

Modified Project

The Modified Project would not result in an increase in the overall allowable number of units in the Downtown Specific Plan area and therefore would not result in an increase in growth beyond what is anticipated by the General Plan. Consequently, the Modified Project would not substantially increase energy demand. No new or more severe impacts would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

None

5.0 Revised Mitigation Monitoring and Reporting Program

Table 9 Mitigation Monitoring and Reporting Program Incorporated into the Modified Project		
Mitigation Measure	Timing of Action(s) and Verification	Responsible Party(ies)
Air Quality		
<p>Air-1: Construction Dust Control Measures. During grading activities for any future development within the General Plan Update planning area boundary, the onsite construction superintendent shall ensure implementation of standard best management practices to reduce the emissions of fugitive dust, including but not limited to the following actions:</p> <ul style="list-style-type: none"> i. Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water will be applied at a frequency to be determined by the onsite construction superintendent. ii. Temporary hydroseeding with irrigation will be implemented on all graded areas on slopes, and areas of cleared vegetation will be revegetated as soon as possible following grading activities in areas that will remain in a disturbed condition (but will not be subject to further construction activities) for a period greater than three months during the construction phase. iii. Operate all vehicles on the construction site at speeds less than 15 miles per hour. iv. Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer. v. If a street sweeper is used to remove any track-out/carry-out, only PM₁₀ efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances. 	During grading activities	City of Escondido; Project Proponent
<p>Air-2: Air Quality Impact Assessment. An Air Quality Impact Analysis shall be prepared for projects within the General Plan Update boundary that exceed one of the air quality study trigger criteria in Table 4.3 12, Air Quality Impact Analysis Trigger Criteria.</p>	An Air Quality Analysis was prepared for the Modified Project by RECON Environmental, Inc. and is included as Attachment 1 to this Addendum.	Complete

Table 9 Mitigation Monitoring and Reporting Program Incorporated into the Modified Project		
Mitigation Measure	Timing of Action(s) and Verification	Responsible Party(ies)
Cultural and Paleontological Resources		
Cul 3: Require that significant archaeological resources be preserved in-situ, as feasible. The incorporation of resources into historical parks and multiple use recreation parks shall be encouraged. When avoidance of impacts is not possible, data recovery mitigation shall be required for all significant resources. Any significant artifacts recovered during excavation, other than cultural material subject to repatriation, shall be curated with its associated records at a curation facility approved by the City. Excavation of deposits of Native American origin shall be coordinated with and monitored by local Native American representatives.	If cultural resources are discovered during ground disturbing activities	City of Escondido; Project Proponent
Cul 4: Develop management and restoration plans for identified and acquired properties with cultural resources.	If cultural resources are discovered during ground disturbing activities	City of Escondido; Project Proponent
Cul-5: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grant or matching funds, or funds from private organizations.	If cultural resources are discovered during ground disturbing activities	City of Escondido
Cul-6: Protect significant cultural resources through coordination and consultation with the NAHC and local tribal governments, including SB-18 review.	The City met with Rincon on December 5, 2024, and March 17, 2025, during which Rincon requested the presence of Native American monitors during any ground disturbing activities. The Modified Project will be conditioned to include a Rincon Native Monitor to be on-site during grading activities.	City of Escondido; Project Proponent
Noise		
Noi-1: Construction Vibration Best Management Practices. All general construction activities that take place within 100 feet of a building with the potential to be damaged by excessive vibration, or use pile-driving, blasting, or other high-impact construction equipment within 200 feet of a daytime NSLU (public and private educational facilities, churches, libraries, museums, cultural facilities, golf courses and passive recreational parks) shall implement the following construction BMPs recommended by the Federal Railroad Administration in the High Speed Ground Transportation Noise and Vibration Impact Assessment (2005): <ol style="list-style-type: none"> 1. Sequence of operations: <ol style="list-style-type: none"> a. Phase demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period. 2. Alternative construction methods: <ol style="list-style-type: none"> a. Avoid impact pile driving where possible in vibration-sensitive areas. Drilled piles or 	During Construction Activities	City of Escondido; Project Proponent

Table 9 Mitigation Monitoring and Reporting Program Incorporated into the Modified Project		
Mitigation Measure	Timing of Action(s) and Verification	Responsible Party(ies)
<p>the use of a sonic or vibratory pile driver causes lower vibration levels where the geological conditions permit their use.</p> <p>b. Select demolition methods not involving impact, where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower vibration levels than impact demolition by pavement breakers, and milling generates lower vibration levels than excavation using clam shell or chisel drops.</p> <p>c. Avoid vibratory rollers and packers near sensitive areas</p>		

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- 2022 Airport Land Use Commission and San Diego County Regional Airport Authority, Airport Land Use Compatibility Plan for McClellan-Palomar Airport.
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ATTACHMENTS
(Under Separate Cover)