

3.0 Sphere of Influence Update and Cumulative Impacts

3.1. Sphere of Influence Update

This section addresses the update to the City of Escondido Municipal Service Review and Sphere of Influence (SOI) Update and the reorganization of Safari Highlands Ranch (SHR) which includes annexation to the City of Escondido and detachment from County Service Area 135. The analysis in this section is largely based on the City of Escondido Municipal Service Review and Sphere of Influence Study (MSR/SOI Study) prepared by the City of Escondido (Escondido 2017) in accordance with state law and San Diego Local Agency Formation Commission (LAFCO) policies. The MSR/SOI Study is included in its entirety in **Appendix 2.11**.

An SOI is a plan for the probable physical boundaries and service area of a local government agency, as determined by the Local Agency Formation Commission. A property must be within a city's SOI before it can be annexed into a city's corporate limits. Annexation is a separate and subsequent LAFCO process to change a jurisdiction's governmental boundaries. Two or more changes of organization initiated in a single proposal (such as concurrent annexation and detachment) are defined as a reorganization.

The City of Escondido's existing adopted SOI includes approximately 68 square miles. The Escondido MSR/SOI update evaluates the ability of the City to serve areas currently within the SOI and seven Candidate Study Areas that would add 1,908 acres to, and delete 1,128 acres from, the City's SOI, resulting in a net gain of 780 acres to the City's SOI. The determination on the City of Escondido SOI update would not change the authorized land use designations in the seven Candidate Study Areas, which currently are under the jurisdiction of the County of San Diego. The County's land use designations would remain in effect until such time as an annexation to the City was approved by LAFCO and subsequently recorded.

Only one of the seven Candidate Study Areas - Candidate Study Area 1: SHR - proposes entitlements at this time. Candidate Study Area 1 proposes reorganization, rezoning, and a project-level development plan, in conjunction with the City's SOI update. The proposed reorganization for this area involves the following jurisdictional changes:

- Annexation to the City of Escondido, which, among other things, would transfer land use authority and service responsibility from the County of San Diego to the City of Escondido
- Detachment from County Service Area (CSA) No. 135 (Regional Communications)
- Concurrent divestiture (exclusion) from the latent structural fire protection/emergency medical service areas of CSA No. 135 (Structural Fire/Emergency Medical Service)

Candidate Study Areas 2 through 6 are proposed only for inclusion within the City's SOI; Candidate Area 7 is proposed for deletion from the City's SOI. No annexation/reorganization, rezoning, or project-level development entitlements are proposed for Candidate Study Areas 2 through 7 at this time.

3.1.1. Existing Conditions

San Diego LAFCO adopted the City's SOI in 1979 and reaffirmed the SOI in 2003 and again in 2008. The existing SOI is designated by LAFCO as being "larger-than-agency" because it includes not just the area within the City's corporate boundary but also adjacent unincorporated territory located in San Diego County.

In 2012, the City of Escondido adopted an update to its General Plan, which identifies a policy framework for guiding the City's growth through 2035. As a policy document with a long-term perspective, a city's general plan may include adjacent territory the city expects to ultimately serve and/or annex, as well as other areas of particular interest to the city. The planning area evaluated in the City of Escondido General Plan update includes the city's corporate boundary, its SOI, and additional unincorporated territory in San Diego County.

Prior to an area being considered for inclusion in a city's SOI, LAFCO requires that the area first be included in the city's general plan. All seven SOI Candidate Study Areas currently are under the land use jurisdiction of the County of San Diego. Also, all are within the City of Escondido's adopted General Plan planning area boundary; some have been in the planning area for decades. **Table 3.1-1** provides summarized descriptions of the seven Candidate Study Areas, including their respective land use designations under both the County of San Diego General Plan and the City of Escondido General Plan. Full descriptions of the seven Candidate Study Areas can be found in **Section 1.0, Project Description**, of this Environmental Impact Report (EIR).

Except for Candidate Study Area 1: SHR, the theoretical maximum yield identified in **Table 3.1-1** refers to the number of dwelling units that potentially could be developed in each Candidate Study Area. The theoretical maximum yield for Candidate Study Area 1 reflects the project-level plan of development for that area, which is fully described in **Section 1.0, Project Description**, of this EIR. Because Candidate Study Areas 2 through 7 do not propose project-level development entitlements at this time, theoretical maximum yields are assumed, taking into consideration each area's general physical site characteristics, designated land uses under the County's General and Community Plans and the City's General Plan, and development criteria specified in each of the respective General Plans.

As an example of General Plan–specified development criteria, certain land use designations contain slope-dependent density requirements, such as allowing a maximum of 1 dwelling unit (DU) per 4, 8, or 20 acres, depending on the presence of slopes ranging in gradients of 0–25 percent, 25–35 percent, and over 35 percent, respectively.

Table 3.1-1. Candidate Study Area Summary

Candidate Study Area		Acres ^a	Existing Use	County of San Diego Land Use Designation	City of Escondido Land Use Designation	Theoretical Max. Yield County/City (Dwelling Units unless otherwise noted)
1	Safari Highlands Ranch	1,098	Undeveloped; not historically used for agriculture	Rural Lands (RL-40) 1 DU/40 AC	SPA #4 ^b 800 DU max	27/550
2	Beacon Sun Ranch	235	Commercial avocado ranch; contains steep slopes	Rural Lands (RL-40) 1 DU/40 AC	Rural I (R1) 1 DU/4, 8, or 20 AC	6/25
3	Remainder of SPA #4	255	Undeveloped; no active agricultural operations	Rural Lands (RL-40) 1 DU/40 AC	SPA #4 800 DU max	170/6 ^c
4	Northeastern Escondido	128	Undeveloped; City-owned; no active agriculture	40 AC designated Rural Lands (RL-40) 1 DU/40 AC 88 AC designated Open Space-Conservation	Rural I (R1) 1 DU/4, 8, or 20 AC	1/16
5	Southwestern Escondido	117	Residential	40 AC designated Rural Lands (RL-20); 1 DU/20 AC 10 AC designated Semi-Rural Residential 1 (SR-1); 1 DU/1, 2, or 4 AC 68 AC designated Semi-Rural Residential 2 (SR-2); 1 DU/2, 4, or 8 AC	48 AC designated SPA #8 (Business Park – Escondido Research Technology Park/Harmony Grove) 10 AC designated Estate I (E1) 1 DU/1, 2, 4, or 20 AC 20 AC designated Estate II (E2) 1 DU/0.5, 1, or 20 AC 40 AC designated Rural II (R2) 1 DU/2, 4, or 20 AC	48 Acres ERTC Specific Plan; 70 DUs/ 70 DUs
6	Remnant Parcels Old Guejito Grade Road	73	Residential	Rural Lands (RL-40) 1 DU/40 AC	Rural I (R1) 1 DU/4, 8, or 20 AC	1/15

Table 3.1-1, continued

Candidate Study Area		Acres ^a	Existing Use	County of San Diego Land Use Designation	City of Escondido Land Use Designation	Theoretical Max. Yield County/City (Dwelling Units unless otherwise noted)
7	Possible SOI Reduction Areas	1,092	Southern portion of Hidden Meadows and Valley Center communities of County of San Diego	11 AC designated Office Professional 8 AC designated; Open Space-Conservation 143 AC designated; Rural Lands 20 (RL-20) 1 DU/20 AC 47 AC designated Semi-Rural Residential (SR-1); 1 DU/1, 2, or 4 AC 88 AC designated Semi-Rural Residential (SR-2); 1 DU/2, 4, or 8 AC 679 AC designated; Semi-Rural Residential (SR-4); 1 DU/4, 8, or 16 AC 115 AC Hidden Meadows Specific Plan Area	Rural I (R1) 1 DU/4, 8, or 20 AC	11 Acres Office Professional, 8 Acres Open Space, 204 dwelling units, 115.5 Acres Hidden Meadows Village Specific Plan, 204 DUs/195 DUs

Source: Escondido 2017

Notes:

- a. Acreages are rounded to the nearest whole number: less than 0.5 are rounded down; 0.5 and greater are rounded up.
- b. Since 1990, the City of Escondido General Plan has included Specific Planning Area #4 (Valley View), which comprises approximately 1,590 acres and includes Candidate Study Areas 1 and 3. The General Plan allows up to 800 dwelling units for the entire SPA #4. The Safari Highlands Ranch project proposes 550 dwelling units.
- c. Approximately 133 acres of SPA #4 have been developed with 80 dwelling units (Rancho Vistamonte), which were annexed into the City's corporate boundary in 2003. The Safari Highlands Ranch project proposes 550 dwelling units. The resulting maximum number of available dwelling units in SPA #4 is 170.

3.1.2. Regulatory Framework

State

Each county in California has a Local Agency Formation Commission, which is an independent, quasi-legislative agency established by state law and governed by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). An SOI is characterized as a planning tool to provide guidance in reviewing individual proposals, promote efficient service provision, and prevent duplication of service responsibilities. Before, or in conjunction with, an update to an SOI, the applicable LAFCO is required to conduct a municipal service review and make written determinations with respect to each of the following:

1. Present and planned land uses in the area, including agricultural and open space lands;
2. The present and probably need for public facilities and services in the area;
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide;
4. The existence of any social or economic communities of interest in the area if the LAFCO determines that they are relevant to the agency; and
5. The present and probable need for public facilities and services related to sewers, municipal and industrial water, or structural fire protection of any disadvantaged unincorporated communities (DUC) within or contiguous to the SOI.

A DUC is an unincorporated, inhabited (e.g., containing 12 or more registered voters) community where the median household income is less than 80 percent of the statewide annual median household income.

The municipal service review includes the information LAFCO needs to make the written determinations. It is an informational document that does not result in immediate implementation, but is intended to provide for the sharing of data, communication, and services among local agencies, organizations, and stakeholders.

Local

San Diego LAFCO

Locally, San Diego LAFCO has adopted policies to implement the mandates of the Cortese-Knox-Hertzberg Act in San Diego County. The following policies are pertinent to the City of Escondido SOI update and the SHR reorganization.

Legislative Policy L-101, Preservation of Open Space and Agricultural Lands

This local policy furthers one of the priorities of the Cortese-Knox-Hertzberg Act regarding the preservation of open space and prime agricultural lands. LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. LAFCOs are directed to guide development away from prime agricultural lands, as defined by Government Code Section 56064, unless that action would not promote the planned, orderly, and efficient development of an area. LAFCOs are to encourage development of existing vacant or non-prime agricultural lands within a

jurisdiction before approving any proposal that would allow development of open space lands outside of an agency's boundary. Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands.

Legislative Policy L-102, Spheres of Influence of Cities and Special Districts

This policy sets forth the manner in which San Diego LAFCO establishes and updates spheres of influence. San Diego LAFCO is to review city and special district SOIs at approximately five-year intervals and to conduct SOI evaluations and updates prior to the five-year interval if an affected jurisdiction or interested party submits a request based on adequate justification. Such justification may include a property under a single ownership that is split by a sphere boundary if the split property shares characteristics including access, geography, communities of interest, and the manner in which services will be provided, or a reorganization involving two or more jurisdictions if the SOI boundaries are coterminous and each jurisdiction agrees to the SOI amendments and reorganization.

Legislative Policy L-106, Strategy for Conducting and Using Municipal Service Reviews

This policy establishes a framework to assist San Diego LAFCO in the preparation of municipal service reviews, while focusing on the service review determinations specified in state law. San Diego LAFCO determines which services are to be included in the municipal service review and determines the final geographic boundary and agencies that are to be the subject of the review. In accordance with this policy, San Diego LAFCO directed the preparation and content of the MSR/SOI Study for the seven Candidate Study Areas involved in the update to the City of Escondido SOI.

The MSR/SOI Study for the Escondido SOI update was prepared in accordance with LAFCO requirements and direction. Among the documents reviewed as part of the MSR/SOI Study are the City of Escondido's 2012 General Plan and Environmental Impact Report, available facilities master plans, such as the 2012 Water Master Plan and 2012 Wastewater Master Plan, major financial documents including the FY 2016 Annual Operating Budget and Preliminary Five-Year Capital Improvement Program and Budget (FY 2016 to FY 2020), the County of San Diego General Plan and Community Plans, and demographic information gathered from the San Diego Association of Governments (SANDAG). Additionally, interviews were conducted with City department representatives who oversee the potential provision of public services to the Candidate Study Areas.

Table 3.1-2 summarizes the recommendations in the MSR/SOI Study regarding the seven Candidate Study Areas. The table also identifies whether a Candidate Study Area is identified as a disadvantaged unincorporated community (DUC) and whether it contains prime agricultural lands.

Table 3.1-2. MSR/SOI Study Recommendations

Candidate Study Area	DUC Yes/No	Prime Agricultural Lands Yes/No	MSR/SOI Recommendation
1	Yes	No ^a	Add to City's SOI ^b
2	Yes	Yes ^c	Add to City's SOI
3	Yes	No	Add to City's SOI only if Candidate Study Area 1: SHR also is added to the City's SOI
4	No	No	Add to City's SOI
5	Yes	Yes	Add to City's SOI
6	Yes	No	Add to City's SOI
7	No	Yes	Remove from City's SOI

- a. Safari Highlands Ranch does not contain Prime Agricultural Land based on the criteria used by LAFCO. The property has not supported agricultural production and does not contain prime soils as classified by the USDA or the Storie Index.
- b. The MSR/SOI Study also recommends that Candidate Study Area 1: SHR be annexed into the City's corporate boundaries.
- c. Per the MSR/SOI Study, Candidate Study Area 2 supports a regionally important commercial avocado ranch. The areas is designated Rural Lands (RL-40, 1 DU/40 AC) by the County of San Diego General Plan, and Rural 1 (R1, 1 DU/4, 8, or 20 AC, depending on slope) by the City of Escondido General Plan. Both of these designations provide for the protection of agricultural lands.

Escondido General Plan

The Escondido General Plan includes several unincorporated neighborhoods within its planning area. These unincorporated areas include the Lake Wohlford, North Broadway, Jesmond Dene, and Harmony Grove neighborhoods. Candidate Study Areas 1, 2, 3, 4, and 6 are in the Lake Wohlford Neighborhood. Candidate Study Area 5 is in the Harmony Grove Neighborhood. Candidate Study Area 7 is in the Lake Wohlford, North Broadway, and Jesmond Dene neighborhoods. The General Plan anticipates that requests for modifying the City's SOI and annexing these unincorporated properties would be considered during the 20-plus-year planning horizon of the General Plan. The General Plan's Land Use and Community Form Element sets forth SOI modifications and annexation policies to ensure that the city's boundary expansions are consistent with the General Plan's vision and the City's long-term goals.

The Land Use and Community Form Element's relevant goals and policies addressing annexation and SOI updates/modifications are as follows:

Goal 16 – Annexation

Annexation of properties for the provision of municipal services where development shall complement and be compatible with adjoining areas without placing an undue burden on the city.

Annexation Policy 16.1

Allow property owners to annex to the city, and actively annex unincorporated lands owned by the city.

Annexation Policy 16.2

Promote the annexation of unincorporated lands where it is determined in the city's interest to promote orderly development, implement goals and objectives, and/or to expedite facilities and services.

Annexation Policy 16.3

Demonstrate that facilities, services, and infrastructure are adequate to serve proposed annexation in accordance with city standards, acknowledging Neighborhood Maintenance & Preservation Policy 4.4 allowing more flexible public improvement requirements in the Rural and Estate I single-family residential areas.

Annexation Policy 16.4

Allow annexations if it can be demonstrated that appropriate improvements as determined by the city will be financed by the property owner(s), and that such expansion of the city will not have unacceptable adverse fiscal or environmental impacts to existing city services or residents. Exceptions to this policy may be considered subject to Policy 16.2.

Annexation Policy 16.8

Expand the Sphere of Influence to be coterminous with the [General Plan] Planning Area boundary where such expansion is deemed appropriate by the City and the Local Agency Formation Commission.

In conjunction with goals and policies, the General Plan outlines 11 Quality of Life Standards that establish minimum thresholds of service levels for various public improvements and facilities for traffic and transportation, public schools, fire service, police service, wastewater system, parks system, library service, open space system, air quality, water system, and economic prosperity. These Quality of Life Standards serve as the basis for analyzing service adequacy, needs, and deficiencies. The MSR/SOI Study prepared for the Escondido SOI update details the current and planned facilities and services for the Candidate Study Areas and compares the performance against, among other factors, the General Plan's Quality of Life Standards.

In evaluating an annexation, the City considers whether the area requesting annexation:

1. Is physically contiguous with City boundaries;
2. Represents a logical expansion of the City;
3. Creates an area of unincorporated county "island;"
4. Involves a DUC;
5. Is experiencing a failed septic system; and
6. Would be adequately served by existing City facilities, services, and infrastructure, based on the City's General Plan Quality of Life Standards.

3.1.3. Analysis of Project Effects and Determination of Significance

In evaluating the significance of the project's environmental effects, California Environmental Quality Act (CEQA) Guidelines Section 15064 requires consideration of both direct physical changes and reasonably foreseeable indirect physical changes in the environment that may be caused by the project. A direct physical change is one that is caused by, and immediately related to, the project. An indirect physical change is one that is not immediately related to the project, but which is caused indirectly by the project. An indirect physical change also may occur when a direct physical change causes yet another physical change in the environment. An indirect

physical change is to be considered only if that change is a reasonably foreseeable impact that may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

To illustrate the difference between direct and indirect physical changes, the State CEQA Guidelines use the construction of a sewage treatment plant as a project example. Under this example, dust, noise, and heavy equipment traffic are identified as direct physical changes in the environment caused by the treatment plant project. The facilitation of population growth in the service area due to the increase in sewage treatment capacity, and an increase in air pollution, are identified as indirect physical changes in the environment caused by the treatment plant project.

Actions on the Escondido SOI update do not authorize any physical development and therefore would not result in direct physical impacts in the environment. However, these actions do provide a pathway to development, thereby resulting in indirect physical changes in the environment. The test is whether the indirect physical change is reasonably foreseeable or is speculative and not reasonably foreseeable.

Analysis of Candidate Study Area 1: SHR

Action on Candidate Study Area 1: SHR, which proposes reorganization, rezoning, and project-level development entitlements in conjunction with the SOI update, would result in reasonably foreseeable direct and indirect physical changes to the environment that must be considered in this analysis. The analysis of the project effects and determination of significance regarding Candidate Study Area 1: SHR is included in **Sections 2.1** through **2.14** in this EIR. **Sections 2.1** through **2.14** include a full discussion of each issue area, impacts, and mitigation measures (if required).

Analysis of Candidate Study Areas 2 through 7

Candidate Study Areas 2 through 7 do not involve annexation/reorganization, rezoning, or project-level development entitlements at this time. The action on the SOI update for these areas represents an initial policy decision that must be followed by subsequent actions prior to commencing physical development, including annexation, rezoning, and/or project-level development entitlements.

Candidate Study Area 7 is proposed for deletion from the City's SOI and would not be required to obtain approvals for annexation and rezoning, only development entitlements, prior to developing under the existing County General Plan land uses. Potential, future subsequent actions for physical development could be a tentative map, tentative parcel map, specific plan, or various use permits. There is no timeline for when these subsequent actions would occur, nor is there any well-defined concept for future development in Candidate Study

Areas 2 through 7 from which to substantively assess potential significant effects. Further, and most importantly, these subsequent actions would require project-level CEQA analysis and determination prior to any physical development. At that time, when defined concepts and project applications are submitted to the City, site-specific CEQA analysis would be conducted which would identify project-specific impacts and mitigation measures. Therefore, the direct

and indirect physical changes in the environment associated with the SOI update for Candidate Study Areas 2-7 are considered speculative and not reasonably foreseeable.

In conclusion, the action on the SOI update, which would include Candidate Study Areas 2 through 6 in the City's SOI and delete Candidate Study Area 7 from the City's SOI, does not authorize any physical development for these areas and therefore would not result in direct physical changes to the environment. **No impacts** would result.

3.2. Cumulative Impact Analysis

Sections 15130 and 15065(c) of the CEQA Guidelines require the discussion of cumulative impacts when they are significant. An EIR is required to identify and discuss cumulative impacts that may result from a project when considered with other closely related projects and reasonably foreseeable projects.

The CEQA Guidelines define cumulative effects as “two or more individual effects that, when considered together are considerable, or which compound or increase other environmental impacts.” The guidelines further state that the individual effects can be the various changes related to a single project, or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects (CEQA Guidelines Section 15355). CEQA Guidelines Section 15130 allows the use of two alternative methods to determine the scope of a project for the cumulative impact analysis:

- **List Method** – A list of past, present, and foreseeable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the lead agency.
- **General Plan Projection Method** – A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For purposes of this EIR, the list method has been used; refer to **Table 3.2-1**. A specific study area has been defined for individual issue areas (traffic and circulation, noise, air quality, etc.) to provide issue-specific analysis of potential project-related cumulative impacts. Existing and reasonably anticipated projects within each study area have been identified and are discussed in greater detail in terms of their potential to contribute to significant cumulative impacts.

3.2.1. Aesthetics and Visual Resources

Cumulative Setting

Figure 2.1-3, Viewshed/cKOP Locations, identifies the project viewshed, which represents the geographic scope of the cumulative study area. Existing and future development within the viewshed would have the potential to be viewed in combination with the proposed project (or portions thereof). Those projects identified in **Table 3.2-1, Cumulative Projects in the Vicinity of Safari Highlands Ranch**, that are located within the viewshed boundary were therefore considered in the cumulative analysis, in addition to the proposed project.

Table 3.2-1. Cumulative Projects in the Vicinity of Safari Highlands Ranch

No.	Project Name	Description	Location
City of Escondido			
1.	Black Angus Restaurant	7,500 SF Restaurant	Westfield North County Mall
2.	Amanda Lane Estates	21 Single-Family Estate Homes	Amanda Lane, north of Gamble Land and east of the I-15 in the City of Escondido. This project has been approved and annexed to the City.
3.	Oak Creek	65 Single-Family Estate Homes	West of I-15 and east of Felicita Road in the City of Escondido. This project has been approved and annexed to the City.
4.	Emmanuel Faith Church Expansion	Church expansion and renovation: 400 additional seats, 200-student preschool	639 E. 17th Avenue in the City of Escondido
5.	1560 South Escondido Blvd Multi-family Residential	2 Commercial Structures, 2 Shopkeeper Flats, 22 townhomes	East side of Escondido Boulevard between 15th Avenue and Felicita Avenue
6.	2516 South Escondido Blvd Multi-family Residential	70 Residential Units	East side of the I-15 and south of Citracado Parkway in the City of Escondido
7.	2412 South Escondido Blvd Multi-family Residential	70 Residential Units	East of the I-15 and north of Citracado Parkway in the City of Escondido
8.	City Plaza Mixed Use	Mixed-use redevelopment with 55 apartments, 5,198 SF commercial space	East side of Escondido Boulevard south
9.	Talk of the Town	Automatic car wash facility, oil change facility, 4,156 SF restaurant	Northwest corner of the Centre City Parkway/ Brotherton Road intersection in the City of Escondido
10.	Monticello Congregate Care	101 congregate care facility units, 30 memory care units, 71 assisted living units	The project is located adjacent to the existing Westminster Seminary site located on Boyle Avenue, east of Bear Valley Parkway in the City of Escondido.
11.	Westminster Seminary	70 condominiums	The project site is located east of Bear Valley Parkway, north of Encino Drive in the City of Escondido.

Table 3.2-1, continued

No.	Project Name	Description	Location
12.	661 Bear Valley	62 Residential Units	The project is located adjacent to the existing Westminster Seminary site located on Boyle Avenue, east of Bear Valley Parkway in the City of Escondido.
County of San Diego			
13.	Morrison Homes	12 lot subdivision	14395 San Pasqual Way, Escondido, CA 92025
14.	Franks Subdivision TM4555	12 lots	14350 San Pasqual Way, Escondido, CA 92025
15.	Escondido Haley Ranch TM4935	5 lots	17331 San Pasqual Valley RD, Escondido, CA 92027
16.	Wohlford PRD TM4567	16 lots	3201 Lemora Lane, Escondido, CA 92027
17.	Royal View Subdivision TM5178	9 lots	2505 Royal View RD, Escondido, CA 92027
18.	Wohlford Partners PRD TM4924	Information unavailable ^b	23904 Crown Hill Lane, Escondido, CA 92027
19.	Equipment Storage 3300-78-1999	Major Use Permit 6500 SF storage yard, 2400 SF shop building on 20 acres	23945 Old Wagon RD, Escondido, CA 92027
20.	Oak Mountain School-Phoenix House	MUP for group care facility, 15 clients, 4 care takers	15397 Oakvale RD, Escondido, CA 92027
21.	San Pasqual/Madrigal PRD STP	STP for 16 lot subdivision (existing)	Vista Norte at Old San Pasqual Road
22.	Oro Verde 10 Lot Subdivision	Information unavailable ^b	NO ADDRESS
23.	Rockwood Canyon Farm Road	Information unavailable ^b	"Initial Consultation" – IN REVIEW
24.	Sringeri Vidya Bharati Foundation Temple	17,500 SF building w/ public worship, 5 dwelling units	Along Old San Pasqual Road between San Pasqual Road and SR-78
City of San Diego			
	No projects to include	—	—

It may be possible to view the project site from vantage points beyond the viewshed boundary. However, such views would not be significantly affected or changed with the project due to the relative size of the proposed structures, distance to the site, topography of the site and the siting of the structural elements within the development area, intervening development and established vegetation, and natural and proposed project landscaping.

As described in the City's General Plan EIR, the City of Escondido and its planning area are characterized by a valley surrounded by rolling hills and mountains. Escondido is highly urbanized; however, portions of the General Plan planning area that are outside of the city boundary, but inside of the planning area, are located in the unincorporated communities of San Dieguito, North County Metropolitan (NC Metro), and Valley Center and support lower-density, more rural-type development patterns.

The planning area includes a diversity of man-made and natural features that contribute to the character of the existing visual setting, including view corridors, viewsheds, and other resources having scenic value. Other scenic natural features throughout the area include creeks and riparian areas, rock outcroppings, and lakes, as well as several large areas of open space including parks, Multiple Habitat Conservation Program (MHCP) lands, and other designated conservation areas. Additionally, the City is in proximity to the Palomar Observatory, and therefore, existing and future development in the planning area has the potential to adversely affect visibility and operations at the observatory.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.1, Aesthetics and Visual Resources**.

Scenic Vistas and Resources

All future development within the identified viewshed would have the potential to affect resources considered to have scenic value in the City's General Plan planning area, particularly development that substantially alters ridgelines or steep hillsides via rigid grading techniques or that results in a substantial loss of natural resources having scenic value (e.g., lakes, streams, large tree stands). Such activities would have the potential to adversely affect, disrupt, or block existing scenic views, thereby contributing to their degradation.

The City does not specifically designate scenic vistas in the General Plan planning area; however, Municipal Code Chapter 33, Article 44, Section 33-1067.F, Design Guidelines for the Hillside and Ridgeline Overlay (HRO) District, identifies major roadways and public open space areas that offer views considered to have scenic value. As stated previously, ridgelines are considered to offer the most important views from scenic vistas in the General Plan planning area; however, views also include valleys, natural vegetation, historic or unique structures, agricultural lands, rivers and lakes, rock outcroppings, and large open spaces.

The SHR project, similar to other future development projects in the viewshed, would be subject to City review for the potential to adversely affect scenic views or resources in the community that are considered to have scenic value. Each development would be considered on an individual basis with regard to proposed visual and physical characteristics, including the loss of on-site scenic resources, the potential to block or disrupt existing scenic views (e.g.,

via significant structural height or bulk), or substantial alteration of ridgelines or skylines, among other features that may contribute to scenic views.

The project would incorporate a clustered design to ensure that the effects of grading are minimized and on-site ridgelines are protected, in addition to maintaining the majority of the site as undeveloped natural open space. Such measures would reduce the project's potential to contribute to the degradation of scenic views or resources, thereby largely allowing the visual setting on the majority of the site to be retained. Conformance with applicable regulations, requirements of the City's Municipal Code (e.g., the Grading and Erosion Control Ordinance), and consistency with the City's General Plan policies would ensure that future development in the cumulative study area does not have a substantial adverse effect on a scenic vista.

There are no officially designated or eligible state scenic highways in the City's General Plan planning area. The closest designated state scenic highway is a portion of State Route 125, located more than 20 miles to the south. Therefore, future development in the cumulative study area, including the proposed project, would not have the potential to substantially damage scenic resources within a state scenic highway.

All future development in Escondido requiring discretionary action would be subject to an evaluation of the significance of potential cumulative visual and aesthetic changes on a site-specific, project-by-project basis, with consideration for its scope and contribution to a change in the community's overall visual pattern or character. Because affected lands would have varied visual characteristics (historic buildings, rock outcroppings, agricultural resources, mature trees, etc.), each development would be considered individually, as well as on a cumulative basis, for its potential to substantially contribute to a change in the overall visual landscape or character as a result of the loss of any such resources. Adherence to applicable General Plan policies and goals and any appropriate City Design Standards, as well as project-specific measures (e.g., with preparation of a specific plan), would reduce potential cumulative impacts relative to the long-term alteration to views of scenic resources.

The project has been designed to minimize the degree to which it would contribute to a change in the visual landscape through sensitive grading design, limiting the development footprint and dedicating on-site open space, and implementing architectural and landscape design standards. As such, the project, when considered with other area development, would not substantially damage scenic vistas. Therefore, cumulative impacts would be **less than significant**.

Visual Character or Quality

Visibility of the project site, when viewed in combination with other projects in the study area, would vary, based on viewing distance; the scale of proposed elements in the visual landscape; topography, intervening development and landscaping; and location of the viewer, among other elements. The project, as with other planned or future development occurring on vacant or generally undeveloped lands in the viewshed, would result in a permanent visual change in the existing landscape, altering the affected land from undeveloped to developed in nature. Such projects, along with other identified redevelopment projects in the more urbanized areas of the viewshed, would have the potential to substantially degrade the existing visual character or quality of the affected site and/or its surroundings.

Construction of currently approved and pending projects in the project vicinity would permanently alter the nature and appearance of the area as future development occurs over upcoming years. Because of the number of projects identified for the cumulative analysis, it is not anticipated that project construction activities would contribute to a cumulative impact on visual resources in the study area. Gradual buildout of the projects considered in the cumulative analysis would result in a change in the existing conditions over time; however, it is not anticipated that such change would result in a significant visual impact as it would not substantially alter the community's overall visual landscape.

Future construction activities in the cumulative study area would occur on various sites and at varied times, when an application for development is made, and may or may not occur at the same time as the proposed project. Therefore, it is unlikely that all such construction and/or disturbance on the affected lands would be experienced by viewers at one time. Such construction-related activities would be short-term and would cease upon completion.

All new development projects in the cumulative study area would be subject to environmental and design review on a site-specific, project-by-project basis to ensure visual aesthetic impacts are limited to the extent possible during the construction process. All future construction activities would be required to be consistent with the City's regulatory requirements and applicable conditions of approval to further reduce potential cumulative effects of construction.

All future discretionary projects would be subject to evaluation of the significance of potential cumulative visual and aesthetic changes on a site-specific, project-by-project basis, with consideration for their scope and their contribution to result in a change to the community's overall visual pattern or character. The addition of the cumulative projects identified would have the potential to create a substantial adverse change to the features that represent a valued visual resource in the area; however, the degree of change would depend on the development proposed and the characteristics of each (scale, bulk, height, materials, etc.).

All future development would be subject to the City's Municipal Code to ensure that grading activities do not substantially alter existing ridgelines and skylines or result in topography that is inconsistent with the natural topography. It is assumed that with development of the discretionary projects, landscaping treatments would be installed to further blend development into the natural surroundings, thereby reducing the projects' effects on the appearance of the existing landscape and enhancing the overall visual setting.

Although the improvements made with the proposed project would be visible from varied vantage points, due to the scale and bulk of the project components, the project as designed is not anticipated to contribute to a significant visual change in the existing viewshed. The proposed development pattern on-site would allow only portions of the site to be viewed in conjunction with other projects in the viewshed, and all on-site development would not be viewed with the other discretionary projects at one time, thereby reducing the visibility of the project elements.

The project has been designed to minimize the degree to which it would contribute to a change in the visual landscape through sensitive grading design, limiting the development footprint and preserving on-site natural open space, and architectural and landscape design standards.

The project would also be subject to conformance with the Design Standards and Guidelines in Chapter V of the SHR Specific Plan to ensure a quality development that is consistent with the overall character of the surrounding community.

Both the project and other future development in the cumulative study area would be subject to the City's Municipal Code and Grading and Erosion Control Ordinance, General Plan policies, and other local regulations intended to minimize the potential visual effects of ongoing development in the viewshed. Conformance with such measures, as well as City discretionary review and approval, would ensure that the proposed project, when considered with other area development, would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, cumulative impacts would be **less than significant**.

Light and Glare

All lighting proposed with future development in the cumulative study area, such as street lighting, security lighting, or exterior illumination, would result in the potential for increased lighting impacts within the community. Additionally, development may include the use of building materials with the potential to result in significant glare effects (e.g., large expanses of reflective glass on commercial buildings). Therefore, depending on the type and intensity of development proposed, future projects within the viewshed, as well as in the larger community and/or region, may have the potential to adversely affect day or nighttime views in the area, as well as operations at the Palomar Observatory located to the northeast, due to lighting and/or glare effects.

The City would evaluate projects in the cumulative study area on a project-by-project basis to determine the extent of such lighting necessary and any appropriate site-specific measures to reduce potential impacts on surrounding areas (shielding, use of low-level lighting, directing lighting away from adjacent properties and open space areas, etc.). As such, it is anticipated that potential cumulative effects of increased lighting and/or glare associated with future development in the cumulative study area would be reduced to less than significant levels.

Because the proposed project would adhere to applicable City and County outdoor lighting requirements, requires minimal lighting for the purposes of maintenance and security, and includes design measures to reduce the potential impact of lighting associated with the development (shielding, directed downward, etc.), the project would not contribute to a significant cumulative impact relative to light and/or glare. Further, specific design measures are included in the SHR Specific Plan to guide the incorporation of nighttime lighting for the project to ensure project effects relative to lighting and glare are minimized to the extent feasible. As such, cumulative impacts with regard to lighting and/or glare are considered to be **less than significant**.

3.2.2. Air Quality

Cumulative Setting

With regard to past and present projects, the background ambient air quality, as measured at the monitoring stations maintained and operated by the San Diego Air Pollution Control District (SDAPCD), measures the concentrations of pollutants from existing sources. Past and

present project impacts are therefore included in the background ambient air quality data. The cumulative projects used in the air quality analysis are listed in **Table 3.2-1**. For the purpose of nonattainment pollutants, the cumulative study area would be the entire air basin; however, contributions from individual projects on basin-wide nonattainment pollutants cannot be determined through modeling analyses.

San Diego County is designated as a nonattainment area for the federal ozone standard and is also a nonattainment area for the state standards for ozone, coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). As such, significant cumulative impacts to air quality for volatile organic compounds (VOCs) (an ozone precursor), nitrogen oxide (NO_x) (an ozone precursor), PM₁₀, and PM_{2.5} exist. The greatest concern involving criteria air pollutants is whether a project would result in a cumulatively considerable net increase of PM₁₀ and/or PM_{2.5} or exceed screening level thresholds of ozone precursors (VOCs and NO_x).

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.2**.

Cumulative Short-Term Construction Impacts

Cumulative impacts during the construction phase would typically happen if two or more projects near each other are simultaneously constructing projects or if a project's PM₁₀, PM_{2.5}, NO_x, and/or VOCs emissions exceed SDAPCD thresholds. With respect to local impacts, cumulative construction particulate impacts are considered when projects may be within a few hundred yards of each other. Since there are no known neighboring construction projects, this issue is not a cumulative concern.

However, the proposed project would generate construction emissions of VOC and NO_x in exceedance of SDAPCD thresholds, even with the implementation of mitigation measures **MM AIR-1** and **MM AIR-2** (see **Section 2.2**). As such, the project, when considered with other area development, would result in a significant cumulative impact and the project's contribution to that impact would be **cumulatively considerable**. The exceedance of the SDAPCD construction thresholds would also result in a significant cumulative impact with respect to violations of the Regional Air Quality Strategy and the State Implementation Plan (short-term construction emissions of NO_x and VOCs) and the project's contribution to this impact is considered **cumulatively considerable**.

Cumulative Long-Term Operational Impacts

As shown in **Table 2.2-7**, the project's emissions would exceed SDAPCD thresholds for VOC, CO, PM₁₀, and PM_{2.5}. The emissions exceedances are predominantly associated with the use of wood-burning hearths/fireplaces, and the resulting impact is **potentially significant**. However, with mitigation incorporated (mitigation measure **MM AIR-3**), the proposed project would not exceed the SDAPCD's adopted operational thresholds. As a result, the proposed project would not contribute a cumulatively considerable increase of any nonattainment criteria pollutant. Accordingly, the project's impacts would be **less than cumulatively considerable**.

3.2.3. Biological Resources

Cumulative Setting

The geographic scope for the cumulative impact analysis includes past, present, and future development projects within a geographic area sufficiently large to provide a reasonable basis for evaluating cumulative impacts relative to biological resources. The geographic scope is partially based on the nature of the geography surrounding the project site and the characteristics and properties of each resource, and the region to which they apply.

Additionally, the region within which the project lies is affected by several habitat conservation plans that are aimed at the long-term protection of sensitive wildlife species and habitat. The County of San Diego is currently in the process of creating a Multiple Species Conservation Program (MSCP) Plan for the unincorporated areas of northern San Diego County. The goal of the MSCP is to maintain and enhance biological diversity in the region and maintain viable populations of endangered, threatened, and key sensitive species and their habitats while promoting regional economic viability by streamlining the land use permit process. The plan, if adopted, would be regulated by the Biological Mitigation Ordinance (BMO), which outlines specific criteria for projects within an MSCP boundary.

The County MSCPs generally do not designate an exact preserve boundary, but instead designate large Pre-Approved Mitigation Areas (PAMAs) within which conservation efforts are to be concentrated and a preserve can be assembled. The MSCPs generally provide incentives for development to occur outside of a PAMA. As such, the MSCPs are intended to provide guidance for addressing potential significant impacts on biological resources and offer mitigation options for development projects located within their boundaries to ensure long-term resource protection on a regional (e.g., cumulative) level.

The southern portion of project site is within an existing PAMA for the approved South County MSCP; the northern portion of the site is within a proposed PAMA in the draft North County MSCP planning area.

The cumulative study area considered for this analysis is the boundaries of the two MSCPs and includes the past, present, and anticipated future development projects (including the proposed project) that lie within these boundaries, as listed in **Table 3.2-1**.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.3**.

As discussed in **Section 2.3, Biological Resources**, the project proposes to preserve approximately 760 acres of the site as undeveloped open space for the protection of natural resources. Although impacts would be minimized through sensitive project design, the proposed development footprint would result in significant impacts to sensitive wildlife and habitat, thereby contributing to a potential loss of such resources in the region. Therefore, when considered with the potential effects of other development projects within the boundaries of the two MSCPs described above, the project would have the potential to contribute to an adverse effect on special-status species and/or sensitive natural communities identified in local or regional plans, policies, or regulations or by the wildlife agencies.

Tables 2.3-3 through 2.3-9 provide a breakdown of anticipated direct impacts resulting with the proposed project. The project would result in a loss of oaks and oak woodland habitat, as well as Brewer's redmaids. Temporary indirect impacts on sensitive avian species that have the potential to be present on-site may also occur with project construction, as well as direct impacts on native vegetation as a result of project grading and clearing that may reduce habitat for sensitive wildlife species including California gnatcatcher, arroyo toad, rosy boa, coast horned lizard, and other species. Other indirect impacts resulting from edge effects (noise, nighttime lighting, fuel modification, landscape irrigation, invasive species or exotic vegetation, use of rodenticides or pesticides, domestic pets, habitat fragmentation, and/or human intrusion into conserved habitat) would also occur, similar to those anticipated with other development projects in the area.

The project would permanently impact habitats and vegetation communities on approximately 31 percent of the project area and portions of the linear off-site improvement areas affected by the primary access road and two emergency access roads (see **Figures 2.3-4A, 2.3-4B, and 2.3-4C**). As shown in **Tables 2.3-3 through 2.3-9**, project development would, to some degree, impact on- and off-site vegetation communities which include Diegan coastal sage scrub, cactus scrub, deer weed scrub, southern mixed chaparral, oak woodland, and non-native grasslands. Disturbance of these vegetation communities would result in a potentially significant impact, and mitigation is required in compliance with County MSCP and non-MSCP mitigation ratios, as shown in **Tables 2.3-7 and 2.3-8**. Therefore, the project would have the potential to contribute to a loss of such habitat in the region, thereby potentially reducing available habitat for sensitive wildlife species within the adopted and draft MSCP boundaries.

The project has been designed to largely avoid the majority of sensitive oak riparian habitat present on-site; however, the project would result in direct impacts to approximately 2.12 acres of oak riparian woodland on-site and 0.50 acre off-site, and approximately 2.58 acres on-site of oak woodland habitat (no off-site impacts). Additionally, the project would result in direct impacts to mulefat scrub totaling approximately 0.05 acre on-site and 0.02 acre off-site. Direct impacts to western ragweed mesic meadow would total approximately 0.15 acres on-site (no off-site impacts). Other impacts to sensitive habitat would occur to Diegan coastal sage scrub, coastal sage-chaparral transition, southern mixed chaparral, and non-native grassland; refer to **Table 2.3-5**. Disturbance of such habitat would result in a potentially significant impact and mitigation is required in compliance with County MSCP and non-MSCP mitigation ratios, as shown in **Table 2.3-8**.

Other future development projects within the MSCP boundaries considered herein would also have the potential to contribute to similar loss of riparian habitat in the region, depending on the conditions on-site. All such development projects would be required to mitigate for impacts on sensitive riparian habitat, as applicable, consistent with MSCP or non-MSCP requirements to ensure the long-term protection of such resources in the region.

To minimize the potential for the project to contribute to a significant cumulative impact on sensitive biological resources in the study area, implementation of mitigation measures **MM BIO-1 through MM BIO-13** would reduce project impacts on sensitive habitat and wildlife species to less than significant.

It is anticipated that other development projects located within the adopted and draft MSCP boundaries would similarly mitigate for impacts on sensitive biological resources as a result of future development on each respective site, as appropriate. As with the proposed project, it is anticipated that such impacts would be mitigated to below a level of significance to ensure the regional long-term protection and maintenance of sensitive species. Refer also to **Section 2.3** of this EIR for a discussion of project consistency with the provisions of the applicable habitat conservation plans. With implementation of mitigation measures **MM BIO-1** through **MM BIO-12**, the project, when considered in combination with other development projects, would not result in a significant cumulative impact on any candidate, sensitive, or special-status species or on any riparian habitat or other sensitive natural habitat. Therefore, project cumulative impacts to biological resources would be **less than cumulatively considerable**.

3.2.4. Cultural Resources

Cumulative Setting

According to CEQA, the importance of cultural resources stems from their research value and the information they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. For sites considered less than culturally significant, the information is preserved through recordation, test excavations, and preservation of artifactual data. Culturally significant sites that are placed in protected open space easements avoid direct impacts and preserve potential research data. Significant sites that are not placed in open space easements and are directly impacted by a project would preserve information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and the South Coast Information Center (SCIC). Because cultural resources are nonrenewable in nature, it is critical that information obtained through survey and excavation is appropriately recorded and retained.

Prehistoric and historic settlement patterns can be very broad; therefore, it is prudent to consider a large study area when evaluating cumulative impacts. The cumulative study area was determined to be 1-mile radius from the project site. The cumulative study area was identified based on potential future research questions that could be developed within the context of subsistence and settlement models for the project area.

The project records searches were used as a guide for making site comparisons and defining site types and resource study areas. In addition, updated information (2015) obtained through the records information found at the SCIC was also used for the cumulative impact assessment. The current status of archaeological sites outside of the project boundaries was verified through visual inspection of aerial imagery. Assumptions of site status were based on aerial maps showing developed lands and site conditions.

There have been 43 archaeological sites recorded in the cumulative study area (1-mile radius of the SHR project site). The primary prehistoric sites identified in or near the project site include surface lithic scatters, temporary camps/artifact scatters, quarries, bedrock milling, and habitation sites. The other sites (quarries, temporary camps/artifact scatters, and habitation locales) are located along the canyons and drainages that feed into the San Dieguito watershed.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.4**.

Impacts to the significant sites in the cumulative study area have been or will be mitigated through avoidance/preservation in open space, data recovery, and curation of cultural materials collected. Following the implementation of mitigation measures **MM CUL-1** through **MM CUL-7**, project impacts would be reduced to less than significant. If significant cultural resources sites were to be discovered during project construction, direct impacts to cultural resources would be reduced to less than significant through proposed mitigation measures that include avoidance, if feasible, recordation, and/or data recovery.

Because the proposed project and those projects identified within the cumulative impact study area are primarily mitigated by the collection and archiving of information and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of and access to archived research materials for future generations. For the SHR project, no on- or off-site significant resources are known, and implementation of avoidance, if feasible, recordation, and/or data recovery, as appropriate, would be implemented in the case of discovery of a new significant cultural resources site during project ground disturbing activities. Any retrieved information would be archived so that it would be available for future researchers. As such, the project, when considered with other area development, would result in **less than significant cumulative** impacts (after mitigation). Relative to tribal cultural resources, no sites or resources meeting the criteria to qualify as significant have been identified. Based on the assumption that other area development would similarly avoid or mitigate any impacts to tribal cultural resources, cumulative impacts are considered **less than significant**.

3.2.5. Geology and Soils

Cumulative Setting

Geotechnical impacts tend to be site-specific rather than cumulative in nature. For example, seismic events may damage or destroy a building on the project site, but the construction of a development project on one site would not cause any adjacent parcels to become more susceptible to seismic events, nor can a project affect local geology in such a manner as to increase risks regionally. Impacts regarding surficial deposits, namely erosion and sediment deposition, however, can be cumulative in nature within a watershed.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.5**.

Soils associated with the project site are similar to other soils in the area. Impacts associated with fault rupture and strong seismic ground shaking, seismic-related ground failure, including liquefaction and unstable soils, landslides, and shallow groundwater are based on site-specific conditions. These inherent conditions are an end result of natural historical events that occur through vast periods of geologic time and are not based on cumulative development.

The SHR project will require grading of portions of the subject property to allow for development as proposed. The project would use both contour grading and terracing techniques to reduce overall grading and to minimize the visual effects of manufactured slopes. Following construction, all graded slopes would be planted for erosion control, and major manufactured slopes would be landscaped in accordance with the approved Landscape Plan. The resulting project site would not be visually and topographically different from existing development surrounding the proposed project site. It is expected that the project and other area development will comply with existing codes and standards, including the California Building Code. Geologic conditions and appropriateness for construction are largely site-specific, and a cumulative impact related to geology and soils would not be expected to occur. Resulting cumulative impacts would be **less than significant**.

3.2.6. Greenhouse Gas Emissions

Because climate change is caused by the collective of human actions taking place throughout the world, it is inherently a cumulative issue. The City of Escondido adopted a Climate Action Plan to address the cumulative impact of greenhouse gas emissions. The proposed project is evaluated against this cumulative criteria and found to result in impacts that are **less than significant** with implementation of the proposed mitigation measures (mitigation measures MM GHG-1 and MM GHG-2). Refer to **Section 2.6**.

3.2.7. Hazards and Hazardous Materials

Cumulative Setting

The cumulative setting for hazards associated with the proposed project generally consists of existing and future uses in Escondido in proximity to Safari Highlands Ranch. In particular, this cumulative setting condition includes the proposed and approved projects identified in **Table 3.2-1**.

Analysis of Cumulative Effects and Determination of Significance

The significance guidelines that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.7**.

Impacts associated with hazardous materials are generally site-specific. The project site does not contain known contaminated groundwater, nor are any asbestos- or lead-containing structures located on the site. Project implementation would result in potential short-term impacts during construction activities associated with exposure to hazards such as potentially contaminated soils. However, hazards and hazardous materials impacts associated with the project would be site-specific and would not contribute to cumulative hazardous impacts. In addition, the proposed project would not result in significant impacts related to airport hazards or regional emergency/evacuation plans. Cumulative projects in the site vicinity would be required to implement, as appropriate, similar site-specific measures to address potential impacts from hazardous materials and airport hazards. These kinds of impacts do not combine to increase effects. Therefore, cumulative impacts related to hazardous materials would be **less than significant**.

3.2.8. Hydrology and Water Quality

Cumulative Setting

Implementation of the proposed project would require conformance with a number of regulatory requirements related to hydrology and water quality, including applicable elements of the Clean Water Act, National Pollutant Discharge Elimination System (NPDES), City storm water standards, California Porter-Cologne Water Quality Control Act, and Water Quality Control Plan for the San Diego Basin (Basin Plan). The cumulative study area is the San Dieguito watershed (905.32 San Dieguito Hydrologic Unit), pursuant to the Basin Plan.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.8**.

The proposed project would be in conformance with all applicable regulatory requirements related to hydrology and water quality. Based on such conformance, all identified project-level hydrology and water quality impacts from the proposed project would be avoided or reduced below a level of significance.

The described regulatory requirements constitute a regional effort to implement hydrology and water quality protections through a watershed-based program designed to meet applicable criteria such as Basin Plan Beneficial Uses and Water Quality Objectives. To this end, these standards require the implementation of efforts to reduce runoff and contaminant discharges to the maximum extent practicable, with the NPDES Municipal Permit identifying the goal of “promoting attainment of water quality objectives necessary to support designated beneficial uses.”

Based on the described regional/watershed-based approach required for hydrology and water quality issues in existing regulatory standards as well as the fact that conformance with these requirements would be required for all identified projects in the cumulative project area, including the proposed project, cumulative hydrology and water quality impacts would be **less than significant**.

3.2.9. Land Use and Planning

Cumulative Setting

Cumulative land use and planning impacts may occur when project-specific impacts evaluated in an EIR are combined with the effects of other projects which, when examined individually, may not be considered to be significant. All of the projects depicted in **Table 3.2-1** were included in review of the potential for significant cumulative land use impacts. The inclusion of all projects in **Table 3.2-1** was based on the location of these projects in the general site vicinity and the possibility that these projects, in combination with the proposed project, would conflict with their respective land use plans and policies.

Analysis of Cumulative Effects and Determination of Significance

The significance guidelines that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.9**.

Physical Division of an Established Community

Cumulative projects would include the construction of new or widened roadways, airports, railroad tracks, open space areas, or other features that would individually have the potential to physically divide an established community. In addition to these larger projects, smaller cumulative projects could have the effect of forming a barrier to access that would physically divide a community. Such impacts would generally be limited to an individual community and would not be cumulative in nature. Multiple projects in the same community could combine to result in a cumulative effect to the division of that community. The proposed project does not propose any new land uses or infrastructure projects, including roadways, that would divide established communities. Therefore, the proposed project, in combination with other cumulative projects, would result in a **less than significant cumulative impact**.

Conflicts with Land Use Plans, Policies, and Regulations

Cumulative projects in the region would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Similar to the proposed project, cumulative projects in the northern San Diego County region would use regional planning documents, and general plans of adjacent jurisdictions and counties would be consistent with the regional plans, to the extent they are applicable. Cumulative projects would be required to comply with the applicable land use plan or they would not be approved. Implementation of the proposed project would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the proposed project. Therefore, the proposed project, in combination with other cumulative projects, would result in a **less than significant cumulative impact**.

3.2.10. Noise

Cumulative Setting

The geographic extent of the cumulative setting for noise consists of the project site and vicinity. Ambient noise levels in the project area are primarily affected by vehicle traffic on nearby area roadways. As a result, the primary factor for cumulative noise impact analysis is the consideration of future traffic noise levels along area roadways.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.10**.

Cumulative noise impacts would occur primarily as a result of increased traffic on vicinity roadways due to buildout of the proposed project and other projects in the vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of project area buildout to the future cumulative base traffic volumes in the project area and vicinity. The noise levels associated with cumulative base traffic volumes without the project and cumulative base traffic volumes with the project are identified in **Table 3.2-2**.

Table 3.2-2. Cumulative Plus Project Conditions Predicted Noise Levels

Roadway Segment	L _{dn} at 100 Feet from Roadway Centerline		Change	Noise Standard (dBA) ¹	Exceeds Standard?	Affected Land Use
	No Project	With Project				
Rockwood Road						
Site Access to Cloverdale Road	54.0	58.5	4.5	>3.4	Yes	Residential, School & Open Space
Cloverdale Road						
Rockwood Road to San Pasqual Valley Road	57.2	60.6	3.4	>2.6	Yes	Residential, Agriculture & Open Space
San Pasqual Road						
San Pasqual Valley Road to Ryan Drive	58.4	59.8	1.4	>2.3	No	Residential, Agriculture & Open Space
Ryan Drive to Bear Valley Parkway	63.0	63.5	0.5	>1.4	No	Residential, School & Open Space
San Pasqual Valley Road						
Zoo Road to Cloverdale Road/San Pasqual Road Intersection	61.9	62.0	0.1	>1.6	No	Zoo, Agriculture & Open Space
Cloverdale Road/San Pasqual Road Intersection to Summit Drive	62.8	63.8	1.0	>1.4	No	Residential, Agriculture & Open Space
Bear Valley Parkway						
San Pasqual Valley Road to Sunset Drive	63.9	63.9	0.0	>1.2	No	Residential & Open Space
Sunset Drive to San Pasqual Road	65.6	65.6	0.0	>1.0	No	Residential, Park, Churches & Schools

Note: Traffic noise levels were calculated using the FHWA roadway noise prediction model. Refer to **Appendix 2.10** for noise modeling assumptions and results.

- Specific noise standards derived from the City's General Plan Community Protection Element. See **Table 2.10-5**. Where existing noise levels fall in between values cited in the Community Protection Element, significance thresholds are adjusted based on the interpolation of the closest given values.

As shown in **Table 3.2-2**, predicted increases in traffic noise levels associated with the cumulative plus project scenario would exceed standards for two roadway segments. While the placement of sound walls along affected streets could reduce resulting noise at certain residential locations, the City of Escondido cannot ensure feasible implementation of noise barriers, as they would fall under County of San Diego jurisdiction and would also likely require property owner approval. Such barriers are therefore deemed infeasible. Because the noise impact is attributed to vehicle noise, effective, measurable remedies to reduce vehicle volumes would need to be identified and implemented to serve as feasible mitigation. While measures such as encouraging ridesharing, carpooling, and alternative modes of transportation could reduce vehicle volumes, such measures can neither be mandated of residents, nor are they shown to reduce vehicle trips to the extent needed to reduce vehicle noise levels below established thresholds. Therefore, no feasible mitigation measures exist to reduce the identified impact. The impact is considered **cumulatively considerable and unavoidable**.

3.2.11. Public Services and Recreation

Cumulative Setting

Several related cumulative development projects have been recently completed or are planned for development in the vicinity of the proposed project, as listed in **Table 3.2-1**. The cumulative study area for public services is the area within the service districts.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.11**.

Police Protection

It is anticipated that expanded police protection services would be funded from increased property taxes and other revenues to the Escondido Police Department resulting from the project, as well as from other cumulative developments in the area surrounding the project site that have contributed or will contribute to the increased demands on police protection services. Accordingly, potential cumulative impacts to police protection would be **less than significant**.

Schools

For the cumulative school analysis, only residential projects that would be served by the same schools as the proposed project are included. Based on the location and type of projects listed in **Table 3.2-1**, each cumulative development project is required to address student loading via development fees at the time of building permit issuance. All three school districts serving the proposed project and cumulative projects have established school impact mitigation fees to address the facility impacts created by residential development. The districts use these fees to pay for facility expansion and upgrades needed to serve new students. These fees will be collected prior to project approval and the issuance of a building permit during the plan check process (Escondido Municipal Code Article 21, Chapter 6). According to the Residential Development School Fee Justification Studies for both the San Pasqual Union School District and the Escondido Union High School District, the cost will go toward financing future school facilities' needs, as appropriate.

The state legislature provided authority for school districts to assess impact fees for both residential and nonresidential development projects. Those fees, as authorized under Education Code Section 17620(a) and Government Code Section 65995(b), are collected by municipalities at the time building permits are issued and conveyed to the affected school district in accordance with a defined fee structure. The legislature has declared that the payment of those fees constitutes full mitigation for the impacts generated by new development.

The established requirements ensure that school services and adequate facilities become available concurrent with the number of students generated by each project. Cumulative impacts to area schools would be **less than significant**.

Libraries

The proposed project and cumulative projects will be required to pay the standard development impact fees pursuant to Escondido Municipal Code Chapter 6, Article 18B. Payment of the public facility development fee ensures that the public facility standards established by the City are met with respect to the additional needs created by residential development. Accordingly, implementation of the proposed project would not result in the need to construct a library facility. Therefore, cumulative impacts to area libraries would be **less than significant**.

Parks and Recreation

Regarding use of existing parks, it was determined that implementation of the proposed project would not have a significant impact on parks and recreational facilities because it would conform to the Municipal Code (Article 18C of Chapter 6), as do other projects in Escondido. Similar to the proposed project, the cumulative projects would be required to comply with the Municipal Code (Article 18C of Chapter 6) in proportion to their potential impact on the demand for parks and recreational facilities, as required by the City. Since mitigation for potential project effects would be required prior to issuance of building permits for all cumulative projects approved by area lead agencies, and a number of mitigation avenues exist (e.g., payment of park fees, the dedication of park land, or a combination of these methods), the cumulative projects would not increase the use of existing neighborhood parks, regional parks, or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. No cumulative regional impact would occur. As noted above, the project's contribution to any regional effect also would be addressed through design and consistency with established requirements.

The adverse impacts of any new or expanded recreational facility required for the cumulative projects would be location-specific and associated with the companion development, and impacts would be analyzed and mitigated separately in a project-level CEQA analysis. Therefore, the project's new recreational facilities would not contribute to a cumulative recreational impact. As a result, cumulative parks and recreation impacts would be **less than significant**.

3.2.12. Traffic and Circulation

Traffic impact analysis is inherently cumulative because it is important to analyze a project's impact within the context of existing and future traffic conditions to which all projects contribute, and where appropriate, provide mitigation measures to reduce a project's contribution to any cumulative significant impacts identified to the degree feasible. Refer to **Section 2.12, Traffic and Circulation**, for a discussion of the project's contribution to potential cumulative traffic impacts and resulting mitigation requirements. While the project, in combination with other cumulative projects, would result in cumulative significant impacts, the project's contribution to these impacts after the implementation of mitigation measures would be **less than cumulatively considerable**.

3.2.13. Utilities and Service Systems

Cumulative Setting

Several related cumulative development projects have been recently completed or are planned for development in the vicinity of the proposed project, as listed in **Table 3.2-1**. The cumulative study area for utilities and service systems is the area within the service districts.

Analysis of Cumulative Effects and Determination of Significance

The significance criteria that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.13**.

Water Supply and Facilities

The San Diego County Water Authority's (SDCWA) 2015 Urban Water Management Plan (UWMP) analyzes comprehensive planning at a regional level and estimates water use associated with accelerated forecasts of residential development as part of its municipal and industrial sector demand projections. The demand associated with accelerated forecast growth is intended to account for the land use development that the San Diego Association of Governments (SANDAG) currently projects to occur between 2035 and 2050, but which has the likely potential to occur on an accelerated schedule. When necessary, this additional demand increment can be used by SDCWA member agencies to meet the demands of development projects not identified in the general land use plans or for new annexations.

As documented in the 2015 UWMP, the SDCWA is planning to meet future and existing demands which include the demand increment associated with the accelerated forecast growth. Part of the SDCWA tool kit in these projections consists of water supply assessments prepared for applicable projects. The SDCWA will assist its member agencies in tracking the agency-provided certified EIRs that include water supply assessments which use the accelerated forecast growth demand increment to demonstrate adequate supplies for the development. Cumulative impacts on water supply and water facilities would be **less than significant**.

Wastewater Management

A collection and treatment system with the appropriate capacity for the proposed project would be constructed as part of the project. All other cumulative developments that would generate sewage would be required to provide adequate wastewater collection and treatment facilities. Therefore, cumulative impacts on wastewater treatment services would be **less than significant**.

3.2.14. Wildfire Hazards

Cumulative Setting

Wildfire has the ability to rapidly spread from one community to another if uncontained, thereby not only affecting localized areas but having the potential to cause damage on a regional scale. Winds can broaden the reach of wildfire effects by carrying embers that may ignite structures or vegetation located at a distance from the core of a fire, or by dispersing smoke and other hazardous contaminants through the air, reducing air quality and resulting in adverse effects on public health. As such, the geographic scope (cumulative study area) for the

cumulative analysis of wildfire hazards is considered to be lands in Escondido, the City's Sphere of Influence, and adjoining communities. The Escondido Fire Department (EFD) provides initial response to lands in the City and by contract to areas within the Rincon del Diablo Water District-Improvement District "E," but service to the larger surrounding area in the unincorporated county, San Marcos, and Vista is provided by the California Department of Forestry and Fire Protection (Cal Fire), the Valley Center Fire Protection District, the Deer Springs Fire Protection District, the Vista Fire Protection District, the San Marcos Fire Protection District, the Rancho Santa Fe Fire Protection District, CSA 135 and other local fire departments through cooperative aid agreements.

Analysis of Cumulative Effects and Determination of Significance

The significance guidelines that were used to evaluate project-specific impacts also are used here to evaluate cumulative impacts. Refer to **Section 2.14**.

Exposure to Risk Involving Wildland Fires

Due to existing conditions (i.e., topography and vegetation), wildfires may occur in wildland areas on and adjacent to the project site, as well as in the surrounding region. However, such events would not be significantly increased in frequency, duration, or size as a result of project implementation.

The Safari Highlands Ranch project (estimated 1,760 future residents) represents a potential increase in fire protection service demand of approximately 182 calls per year, which is within the capacity of the existing EFD fire stations that presently serve the area. However, the project would increase demand on Station 4, and the station's response time to the entrance of the project site presently exceeds the City's emergency response time standard. The project, when considered with other development in the study area, would have the potential to result in a potentially significant cumulative impact from exposure of people or structures to a risk of loss, injury, or death involving wildland fires.

Such impacts would be substantially reduced through construction of the proposed on-site fire station. The fire station would be maintained through assessments, property taxes, and/or a separate agreement. The final funding amount would be determined by the project applicant and the City of Escondido and included in a Fire Service Agreement to be completed at later stages of planning, prior to map recordation. The planned new fire station would be adequate to respond to project-generated calls and would have significant capacity to respond to other calls from outside of the project in a time frame that would represent a substantial improvement as compared to existing service. Therefore, significant cumulative impacts would not result.

Furthermore, project implementation would largely convert a portion of the subject site from readily ignited fuels (undeveloped, vegetated lands) to ignition-resistant structures and landscape, in combination with an up to 200-foot-wide fuel modification zone along the perimeter of the project site as a preventive buffer for the spread of wildfire onto adjacent lands (or onto the project site). These measures would provide greater fire protection for area residents who do not presently have fire-resistant features on their homes (i.e., tile roofing). Similarly, future development in the study area that converts undeveloped, vegetated lands

into developed lands would further contribute to a reduction in fuels more prone to the occurrence of wildfire.

Therefore, when considered with other cumulative projects in the study area, cumulative impacts would be **less than significant**.

Impair Emergency Plan or Evacuation Plan

Currently, no encompassing emergency evacuation plans have been adopted for the project region. However, existing and future development in the cumulative study area would be subject to a regional emergency response and/or evacuation in the event of a wildfire or other significant event (for example, a major earthquake).

The County's Office of Emergency Services oversees implementation of the Operational Area Emergency Plan and the County's Multi-Jurisdictional Hazard Mitigation Plan. Both plans outline mechanisms to ensure proper protocols are followed in the event of a regional emergency. All existing and future development in the cumulative study area would be subject to the measures identified in these plans, which are intended to ensure that emergency access routes are maintained and proper evacuation procedures implemented, thereby reducing potential risk for public endangerment or impairment of evacuation in the event of an emergency. All development projects would be required to demonstrate that they would not interfere with implementation of either plan prior to approval.

The Safari Highlands Ranch Wildland Fire Evacuation Plan has been prepared specific to the project site to ensure that adequate emergency access and evacuation of the site can be maintained over the long term; refer to **Appendix 2.14**. In the event of a wildfire, neighboring communities within the SOI of Safari Highlands Ranch may be evacuating in a similar time frame, depending on the type of wildfire emergency, including the 580-unit Rancho San Pasqual community (accessed via Rockwood Road and Cloverdale Road) and the 80-unit Vista Monte community (accessed via Rockwood Road). Additionally, the San Pasqual Union School located off Rockwood Road may also affect typical evacuations. As such, the project has been evaluated for its potential to contribute to impairment of evacuation of the site and/or surrounding lands. As discussed in **Section 2.14**, it is calculated that up to 1,652 vehicles in addition to the 1,210 vehicles from Safari Highlands Ranch (total of 2,862 vehicles) could be evacuating in a similar time frame during a major wildfire incident that required full evacuation of the area, although this is a conservative estimate.

The analysis determined that under the most common scenario of a Santa Ana wind-driven fire approaching from the open lands to the east-northeast, there would be adequate time for a full evacuation of the project site and surrounding communities (4 hours for fire to reach Safari Highlands Ranch site and 3 hours maximum evacuation of all communities), while other scenarios could result in inadequate evacuation times. Perhaps the "worst-case" scenario is a wildfire that encroaches upon Safari Highlands Ranch and neighboring communities in a short time frame, with Rockwood Road becoming the only viable exit for Safari Highlands Ranch residents due to blockages or hazards on the alternate egresses. In this scenario, law enforcement would have the option to conduct a phased evacuation of Safari Highlands Ranch residents, relocate residents within the project, or even instruct all residents to take temporary refuge in their homes or designated facilities within the Village Core.

While Safari Highlands Ranch is not officially designated a shelter-in-place community, the proposed structures would be ignition-resistant, defensible, and designed to require minimal resources for protection, thereby enabling contingency options that may not be available to existing neighboring communities. Such project design features would enable law enforcement to effectively manage the outflow of Safari Highlands Ranch residents' vehicles onto Rockwood Road, such that existing evacuation times for the neighboring Rancho Vistamonte and Rancho San Pasqual communities would not be adversely affected, and adopted evacuation procedures would not be interrupted or interfered with.

Measures identified in the plan can ultimately be integrated into a regional evacuation plan if and when area officials and stakeholders prepare one. However, as a stand-alone document, the project-specific evacuation plan would facilitate the safe evacuation of residents of the proposed development and would ensure that the project does not interfere with or inhibit evacuation of surrounding properties. With implementation of the evacuation plan, the project is not anticipated to contribute to a cumulative impact by impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. Therefore, when considered with other cumulative projects in the study area, a significant cumulative impact would not occur. Cumulative impacts would be **less than significant**.

Provision of New Facilities to Maintain Service

As previously stated, construction of the proposed on-site fire station would allow adequate provision of fire protection services for the project site and surrounding land uses within the station's designated service area (and beyond, if such an event arises). Additional resources would also be available from EFD Stations 2 and 4, which are considered underutilized on a call volume basis, based on the results of the analysis in the Safari Highlands Ranch Fire Protection Plan and when compared to standard utilization rates for busy fire stations.

Prior to approval by the affected jurisdiction, the proposed project, in combination with other future projects in the cumulative study area, would be required to demonstrate that emergency response objectives can be met or to otherwise offer a feasible alternative to achieve comparable emergency response objectives. With construction of the proposed fire station, response times for the project and adjacent land uses would be met. Further, all potential physical impacts resulting from project implementation have been evaluated in **Section 2.0** of this EIR and mitigated to the maximum extent feasible.

Future projects in the cumulative study area would also be subject to fire service availability and suppression assessments, as appropriate, that are intended to enable the fire service agencies to proportionally augment and enhance staffing, which would in turn offset a growing population and increased call volumes, resulting in a favorable condition. As such, when considered with other development within the study area, the proposed project is not anticipated to contribute to a substantial adverse physical impact associated with the need and provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Cumulative impacts would be **less than significant**.

3.3. Growth Inducement

As stated in State CEQA Guidelines Section 15126.2(d), an EIR must discuss whether or not a project may be growth inducing. The question to be asked is whether or not a “project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Included are projects that would remove obstacles to population growth. Examples of these types of actions include (1) a “major expansion of a wastewater treatment plant” that would thereby allow for more construction in service areas covered by the plant; and (2) actions that could encourage and facilitate “other activities” that could significantly affect the environment. Typically, the latter issue involves the potential for a project to induce further growth by the expansion or extension of existing services, utilities, or infrastructure.

The CEQA Guidelines further state that “[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment” (Section 15126.2[d]). This EIR therefore evaluates the proposed project’s influence on growth in the surrounding area as a result of an increase in residential density through General Plan/specific plan amendments and rezone applications, on-site and off-site road improvements, extension of public services or utility lines, and construction of a fire station.

It is relevant to note that the proposed project would be largely consistent with growth envisioned both in the City’s General Plan and in the San Diego Association of Governments (SANDAG) 2050 Regional Transportation Plan (RTP; SANDAG 2011), but it is not entirely consistent because of the higher housing density the project proposes.

The SHR project site is located in an unincorporated area of northeastern San Diego County, California, approximately 30 miles north of downtown San Diego and 18 miles east of the Pacific Ocean. The property is east of the Rancho San Pasqual community (580 homes), northeast of the Rancho Vistamonte community (80 homes), and just north of the San Diego Zoo Safari Park (see **Figure 1-1A, Safari Highlands Ranch Location Map**). For purposes of understanding the proposed project setting and the potential to induce growth in the project vicinity, see **Figure 1-1B, Sphere of Influence Study Areas**, which depicts the surrounding land uses.

3.3.1. Growth Inducement Due to Land Use Policy Changes and Construction of Housing

As noted above, the proposed project would be generally consistent with projected growth in both the City’s General Plan and the SANDAG 2050 RTP analyses, and would become fully consistent with these plans with adoption of the General Plan Amendment (GPA) that is part of the project and with the eventual corresponding amendments to the RTP (refer to discussion below). Based on concerns regarding residential housing shortages, urban sprawl, and traffic loading on surrounding roadways, the City and SANDAG specifically reviewed where best to place new population nodes, taking into account three primary criteria: employment and commercial opportunities in the vicinity; existing infrastructure; and surrounding residential densities. The SANDAG 2050 Regional Transportation Plan includes a combination of economic and demographic projects, existing land use plans and policies, and potential future land use plan changes.

The area where the proposed project is sited is identified in these plans as suitable for residential development (although at a lower density than the project proposes) due to the employment and commercial opportunities in Escondido and nearby San Marcos. Escondido, in particular, is actively expanding work opportunities, with new commercial/industrial and health-care-focused work opportunities being generated just north of Harmony Grove Road and along Citracado Parkway. Public roads leading to the project area are currently in place on the southern and southwestern sides of the property. Water, gas, and electrical utilities will be extended to the project area from Rockwood Road and are proposed to serve the area within the project boundaries. Suburban housing currently exists south and southwest of the project site. As such, identification of the project site for estate residential development is consistent with the goals of existing regional plans. The SHR project brings residential uses to an area experiencing housing shortages and places residences in proximity to similar uses, necessary utilities, and work opportunities.

The possibility that substantial growth-inducing impacts may occur with respect to land use plan conformance to the existing City General Plan, Subregional Plan or Specific Plan, and City Zoning Code must be addressed. If the SHR project is approved for development of 550 dwelling units as proposed, the remaining maximum balance of units available within SPA #4 property to the south and northeast of the SHR project would be 170. This density would be in exchange for on-site and/or off-site community benefits in addition to the project's impacts as permitted in the General Plan. The project includes preparation and adoption of a Specific Plan and a prezone as part of the requested discretionary actions; a General Plan Amendment is not required or proposed. With project approval and the adoption of the Specific Plan and the prezone, the project would be consistent with applicable land use designations.

The question arises as to whether the GPA and the prezone associated with the proposed project would encourage an associated similar pattern of growth in the surrounding area. As discussed above, the key growth-inducement issue is the potential for a project to foster economic and population growth or the construction of additional housing in the area surrounding the project.

First, substantial growth surrounding the proposed project site is not anticipated because of the lack of developable land. Most of the undeveloped lands surrounding the project site consist of steeply sloping terrain or environmentally constrained areas, such as the San Diego Zoo Safari Park to the south, single-family residences occasionally to the north and west, Rancho San Pasqual development directly to the west, and site drainage by two primary tributaries that flow in a southwesterly direction.

As described in **Section 1.0, Project Description**, the proposed project consists of two primary components: (1) the Safari Highlands Ranch project and (2) the Citywide MSR/SOI update. For a complete description and analysis of the SOI update and analysis, see **Section 3.1**. Only one of the seven Candidate Study Areas—Candidate Study Area 1: SHR—proposes additional entitlements at this time. Candidate Study Areas 2 through 6 are proposed only for inclusion within the City's SOI; Candidate Study Area 7 is proposed for deletion from the City's SOI. However, the proposed action on the SOI update does not authorize any physical development for these areas and therefore would not result in direct physical changes to the environment. No annexation/reorganization, rezoning, or other project-level development entitlements are proposed for Candidate Study Areas 2 through 7 at this time.

In 2012, the City of Escondido adopted an update to its General Plan, which identifies a policy framework for guiding the City's growth through 2035. As a policy document with a long-term perspective, a city's general plan may include adjacent territory the city expects to ultimately serve and/or annex, as well as other areas of particular interest to the city. The planning area evaluated in the City of Escondido General Plan update includes the City's corporate boundary, its SOI, and additional unincorporated territory in San Diego County.

Prior to an area being considered for inclusion in a city's sphere of influence, LAFCO requires that the area first be included in the city's general plan. All seven SOI Candidate Study Areas are currently under the land use jurisdiction of the County of San Diego. Also, all are within the City of Escondido's adopted General Plan planning area boundary; some have been in the planning area for decades. Therefore, the proposed expansion which would be included in the SOI update would not be growth inducing.

Furthermore, the proposed land uses consist primarily of housing, along with recreational uses and open space. The project would not include a major employment center or employment opportunities that could spur growth; rather, the project is considered to be growth accommodating (as opposed to growth inducing), because the project would provide additional housing opportunities in a region in which construction of 388,436 new homes is forecast to be required by 2050 to accommodate a 40 percent increase in the regional population (SANDAG 2011).

In and of itself, approval of the proposed project would not render it more, or less, likely that additional development in the surrounding area would take place. As described above, the planning agencies with responsibility for siting development have laid out a plan for this part of the City with which the proposed project is generally consistent. The fact that project implementation would accommodate these plans—rather than trigger them—indicates that the project would not be growth inducing. Other developments may be proposed, and they also would be required to evaluate potential conflicts with the applicable general plans in their respective CEQA documents and would be subject to review and approval by the City.

3.3.2. Growth Inducement Due to Provision of Public Services and Recreation

The provision of public services or recreation could potentially induce growth by eliminating an obstacle to growth. For a complete discussion and analysis of proposed public services and utilities, see **Section 2.11, Public Services and Recreation**.

The proposed project would build and dedicate to the City a fire station which would be located at the southern tip of the project boundary, near the main entrance of the site off Safari Highlands Ranch Road (refer to **Section 1.0, Project Description**). This station would be a Escondido Fire Department (EFD) station. The fire station would provide service to the project site and improve emergency response for fire and medical emergencies in the area. Travel time from the new station to the most remote (distant) lot within the project boundaries is estimated to be 5.8 minutes, within the 7.5-minute EFD response goal (Dudek 2017). While surrounding properties would benefit from improved fire service, the proposed fire station would not increase the number of properties that could be served within the 7.5-minute response time standard. Therefore, the project would not remove a barrier to growth because current response time standards for surrounding parcels would not change.

A shortfall of schools is identified in **Section 3.2.11**, but identified mitigation consists of payment of fees, so the project would only support school construction required to serve students residing in Safari Highlands Ranch.

The proposed project would construct a private swim and tennis recreation facility and public multi-use trails. The provision of these facilities would not induce growth, however; they would accommodate existing and planned growth. Recreational facilities would be provided for the use and benefit of members of the public and future project residents within the facilities' effective service radius and to avoid overburdening other parks in the project vicinity.

Therefore, the proposed project would not induce growth through provision of public facilities or services.

3.3.3. Growth Inducement Due to Roadway Construction/Improvements

The construction of new roadways or the improvement of existing roadways and intersections could potentially induce growth if that development/improvement provides significantly improved accessibility to undeveloped or underdeveloped sites, or if it removes an obstacle to development by providing greater roadway capacity than is needed to serve existing and cumulative development. The proposed development would include paving and widening of two 21-foot-wide travel lanes, bicycle lanes, a pedestrian path, and landscaping of Safari Highlands Road, only increasing their capacity to the extent necessary to accommodate project-related traffic. Local drivers already use these roadways; the widening would not be sufficient to attract additional drivers beyond those associated with the project and would not extend these roadways northward or eastward beyond the private roadways of the project site. Any undeveloped parcels west of the project site are already served by these roads. Thus, improvements to Safari Highland Road would not open an access route to lands that were previously inaccessible.

In addition, the proposed project would construct a private, on-site street system connecting the project's neighborhoods and recreational amenities. These roads could be used by local motorists, but this use would be relatively minimal, given the areas accessed, and would not be a basis for additional area growth. Because the proposed roadway improvements would be designed to only serve the project, growth-inducing effects are not anticipated.

The proposed emergency access road within Candidate Study Area 2 (Beacon Sun Ranch) that connects to Safari Highlands Ranch would not be considered growth inducing because the road is being built for the limited purpose of emergency response rather than to accommodate general development-related traffic.

3.3.4. Growth Inducement Due to Extension of Public Utilities

The extension of public water and sewer services into new areas or the increase in capacity of existing facilities is traditionally seen as having the potential to encourage either development of existing, vacant properties adjoining utility improvements or more intensive use of existing developed lots near these utilities. In the case of the proposed project, growth inducement due to project upgrades is not likely to occur because sewer, potable water, gas, electricity, and telecommunications lines are generally already available in the project area, serving other

existing nearby development. For a complete discussion and analysis of proposed utilities services, see **Section 2.13, Utilities and Service Systems**.

The project area would have adequate water supply to the proposed development of single-family residential homes, the recreation center, the fire station, and irrigated common areas. Water services will be divided into three hydraulic grade zones. The water will enter the project from the main on Rockwood Road and then pass through a new pump station, which will convey the water through the project to the constructed reservoir. The construction of the reservoir (tank) will only serve the proposed project—approximately 550 residential units, the recreation center, and the fire station. Refer to Chapter 3 of **Appendix 2.13-1, Safari Highlands Ranch Potable Water and Recycled Water Report**, for further details regarding water services.

Existing sewer facilities are located in the vicinity of the project area. The existing sewer system that would have adequate capacity and serve the project area consists of a 12-inch gravity line leading from Rockwood Road to Lift Station 13.

Service would be extended only to the project, and the area surrounding utility extensions consists of existing or planned development by others. The project would not be extending services to a new, undeveloped area where connections off-site to future development could occur. Similarly, detention/retention facilities would be constructed only to satisfy the needs of the project. As such, the extension of public utilities to the project site is not considered to be growth inducing.

3.3.5. Conclusion

In summary, the proposed project would not promote the construction of additional housing, provide employment opportunities, and/or extend roads, public services, or utilities into large, developable open space areas. Therefore, the project would not result in substantial growth inducement.

3.3.6. Sources Cited

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