

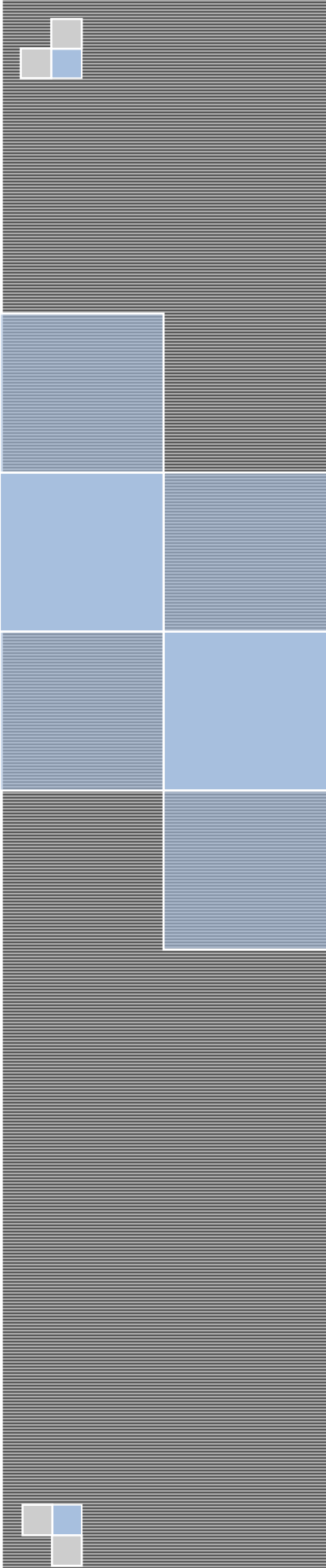




## **ATTACHMENT 4**

# **Addendum to the General Plan Final Environmental Impact Report (SCH# 2011071028) for the 2021-2029 Draft Housing Element**



# Addendum to the City of San Marcos General Plan Final Environmental Impact Report

2021-2029 Housing Element Update

June 2021

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A Land Use Planning, Design, and Environmental Firm



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# 1 INTRODUCTION

## 1.1 PURPOSE AND BACKGROUND

The City of San Marcos is the Lead Agency under the California Environmental Quality Act (CEQA). On February 14, 2012, the City Council adopted the San Marcos General Plan, including the Housing Element, and certified the San Marcos General Plan Final Environmental Impact Report (General Plan FEIR) (State Clearinghouse #2011071028).<sup>1</sup> On June 25, 2013, the City Council adopted the City of San Marcos 2013-2021 Housing Element and certified the April 2013 Addendum to the General Plan FEIR.<sup>2</sup> The City now proposes the current 2021-2029 Housing Element for the 6<sup>th</sup> cycle (referenced herein as “Modified Project” or “Project”). The Modified Project involves minor changes/additions to the Housing Element in compliance with State Housing Element Law Government Code Sections 65580-65590.1.

Following preliminary review of the proposed Housing Element Update, the City of San Marcos, as Lead Agency, has determined that the proposed Project is subject to CEQA (Public Resources Code [PRC] Sections 21000-21177). This Addendum to the General Plan FEIR has been prepared by the City to demonstrate that the proposed Housing Element Update does not meet the conditions warranting preparation of a Subsequent or Supplemental EIR, as the General Plan FEIR fully analyzed the potential environmental impacts associated with the Housing Element Update, as described further.

## 1.2 CEQA REQUIREMENTS

The purpose of this Addendum is to analyze any potential differences between the impacts identified in the General Plan FEIR and those that would be associated with the proposed Project. Pursuant to provisions of CEQA and State CEQA Guidelines the City is the Lead Agency charged with the responsibility of deciding whether to approve the Project. As part of its decision-making process, the City is required to review and consider whether the proposed Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the General Plan FEIR.

Additional CEQA review beyond this Addendum would only be triggered if the Project created new significant impacts or impacts that are more severe than those disclosed in the General Plan FEIR used to approve the San Marcos General Plan in 2012. To use an Addendum as the appropriate CEQA document for the proposed Project, the City must find that major revisions to the General Plan FEIR are not necessary and that none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of additional CEQA documentation has occurred.

In accordance with the State CEQA Guidelines, prior to approving further discretionary action and depending upon the situation, the lead agency must generally either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare

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<sup>1</sup> City Council Resolution 2012-7615.

<sup>2</sup> City Council Resolution 2013-7805.

an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation. (See State CEQA Guidelines, §§ 15162 – 15164.) State CEQA Guidelines Section 15162 states:

When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the State CEQA Guidelines explains when an Addendum to an EIR is appropriate. Per this section, where some changes or additions are necessary to the previously certified EIR, but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR (as described above) have occurred, then the lead agency is directed to prepare an Addendum to the certified EIR (State CEQA Guidelines, § 15164). Further, the Addendum should include a “brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162,” and that “explanation must be supported by substantial evidence” (State CEQA Guidelines, § 15164 [e]). The Addendum need not be circulated for public review but may simply be attached to the certified EIR (State CEQA Guidelines, § 15164 [c]).

## 1.3 INCORPORATION BY REFERENCE

The documents outlined below, which were utilized during preparation of this Addendum and are a matter of public record, are hereby incorporated by reference.

### San Marcos General Plan

The City Council comprehensively adopted the 2012 Update to the City of San Marcos General Plan on February 14, 2012. The General Plan is a comprehensive legal document that sets forth the City's long-range planning policies and serves as the guiding document for achieving the community's vision for the future. The General Plan contains goals, policies, and programs to guide land use and development, and is organized into seven mandatory "elements" in accordance with California Government Code Section 65302: Land Use, Housing, Circulation, Conservation, Open Space, Noise, and Safety. For the 2012 San Marcos General Plan, these elements are organized into Land Use and Community Design, Mobility, Conservation and Open Space, Parks, Recreation and Community Health, Safety, Noise, and Housing Elements. The 6<sup>th</sup> Cycle Housing Element Update is the subject of this Addendum.

Land Use Element Table 2-4 presents the Land Use Plan's buildout potentials and assumptions. Full implementation of the General Plan is anticipated to result in a total of 41,843 dwelling units and approximately 32.9 million square feet of non-residential land uses.

### San Marcos General Plan Final EIR

The City Council adopted the General Plan FEIR on February 14, 2012. The General Plan FEIR provides a program-level analysis of the general environmental impacts resulting from the development of land uses and implementation of policies established within the 2012 General Plan. The General Plan FEIR's analysis is based on the change between development under existing conditions (at the time of document preparation) and those projected for likely development in accordance with the General Plan by theoretical expected development capacity. Based on General Plan FEIR Tables 2.0-2 and 2.0-3, the General Plan FEIR assumed and analyzed the environmental impacts resulting from the following<sup>3</sup>: approximately 37,655 additional persons; 11,208 additional dwelling units; and approximately 21.3 million additional square feet of non-residential land uses. The City's projected population resulting from full implementation of the General Plan is 128,917 persons. The General Plan FEIR concluded that full implementation of the General Plan would result in less than significant impacts or less than significant impacts with the implementation of mitigation measures for all issue areas analyzed except for 3.3 Air Quality (Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation) and 3.7 Greenhouse Gas Emissions (Generation of GHG Emissions), which were determined to be significant and unavoidable. The General Plan FEIR's background and policy information and environmental impact conclusions are cited throughout this Addendum.

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<sup>3</sup> These numbers represent the expected net change in Planning Area Totals from existing 2010 (baseline) to expected development capacity, as calculated in the San Marcos General Plan.

## **Addendum to the San Marcos General Plan Final EIR for the 2013-2021 Housing Element**

The City Council adopted the City of San Marcos General Plan Housing Element for the 2013-2021 planning period and Addendum to the General Plan FEIR on June 25, 2013. The 2013-2021 Housing Element Update involved minor changes and additions to the Housing Element in compliance with State Housing Element Law Government Code Sections 65580-65590.1. The Addendum to the General Plan FEIR concluded there were no substantial changes to the 5<sup>th</sup> Cycle Housing Element (from 2013-2021) that would require major revisions of the Final EIR for the General Plan Update.

### **San Marcos Municipal Code**

The City of San Marcos Municipal Code consists of the City's regulatory and penal ordinances, and certain administrative ordinances. The City's Zoning Ordinance is codified into Title 20, Zoning. The purpose of the Zoning Ordinance is: to protect and promote the public health, safety, comfort, convenience, and general welfare of the San Marcos community; to implement the policies of the General Plan; and to provide the physical, environmental, economic, and social advantages that result from the orderly planned use of land resources. More specifically, the purposes of the Zoning Ordinance are: to establish regulations for the development of land uses and improvements within zoning districts (Zones) in accordance with the goals and policies of the General Plan; to ensure the orderly, attractive, and efficient growth and development of the City of San Marcos for the maximum benefit of its citizens; to strengthen the economic conditions and vitality of commercial centers to maintain and promote existing business and generate opportunities to attract new business; to enable flexibility in development type and scale by location to provide for emerging economic and social trends; and to ensure compatibility between different types of development and land uses.

## 2 ADDENDUM FINDING

As detailed herein, on the basis of substantial evidence in the light of the whole record, a Subsequent or Supplemental EIR is not appropriate for the proposed Project because none of the criteria permitting such a document under State CEQA Guidelines section 15162 are met.

The 2021-2029 Housing Element Update would result in no new significant impacts that were not analyzed in the General Plan FEIR, nor would the proposed Project cause a substantial increase in the severity of any previously identified environmental impacts. The potential impacts associated with the proposed Project would either be the same or less than those described in the General Plan FEIR. In addition, there are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the General Plan FEIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum to the previously certified General Plan FEIR is the appropriate environmental documentation for the proposed Project. In taking action on any of the approvals, the decision-making body must consider the whole of the data presented in the Final EIR and the previously adopted Mitigation Monitoring and Reporting Program (MMRP).



## **3 DESCRIPTION OF THE PROPOSED PROJECT**

### **3.1 BACKGROUND**

#### **3.1.1 HOUSING ELEMENTS AND REGIONAL HOUSING NEEDS ALLOCATION**

The Housing Element is a State-mandated element of the General Plan. The City of San Marcos must update its Housing Element every eight years. Updates to the Housing Element must meet the requirements of California Government Code Sections 65580-65589. The purposes of the Housing Element are to identify the community's housing needs; to state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs; and to define the policies and programs that the community will implement to achieve the stated goals and objectives.

State law requires that the City accommodate its “fair share” of regional housing needs, which are assigned by the San Diego Association of Governments (SANDAG) for all jurisdictions in the San Diego region. SANDAG established the 2021-2029 Regional Housing Needs Plan (RHNP) to assign each city and the unincorporated county in the region its fair share of the regional housing need based on a number of factors established by State law (Government Code Section 65584) and regional housing burdens and needs. The objectives of the Regional Housing Needs Allocation (RHNA) are:

- Increase housing supply and the mix of housing types;
- Promote infill, equity, and environment;
- Ensure jobs housing balance and fit;
- Promote regional income equity; and
- Affirmatively further fair housing.

Beyond the income-based housing needs established by the RHNA, the Housing Element must also address special needs groups; such as seniors, persons with disabilities including developmental disabilities, single female parents, large families, farm workers, and homeless persons.

### **3.2 PROJECT LOCATION AND SETTING**

The City of San Marcos comprises an area of roughly 24.38 square miles located in the central portion of northern San Diego County (North County), approximately 40 miles north of downtown San Diego. The City is bounded by the cities of Vista and Carlsbad to the west, the City of Escondido to the east, and unincorporated areas within the County of San Diego to the north and south. Regional access to the City is provided by State Route 78, an east/west highway that links Interstate 5 with Interstate 15, which provide north/south access to San Marcos and the greater San Diego region; refer to Figure 1, Regional Location. The General Plan planning area for San Marcos encompasses approximately 33.06 square miles, which include the corporate City limits as well as portions of the County of San Diego’s unincorporated land within the City’s Sphere of Influence (SOI); refer to Figure 2, General Plan Planning Area). From its rural and agricultural origins, San Marcos has become one of the fastest growing cities in San Diego County with a present-day population of 97,200 people. Today, San Marcos offers an interface between urban and rural living. Surrounded by foothills, it is a midsize suburban city that has become an education

hub in North County, home to two places of higher learning – Palomar College and California State University San Marcos.

The General Plan identifies the most prevalent land uses in San Marcos as residential, consisting of 31 percent of the planning area; vacant lands consisting of approximately 25 percent of the planning area; and parks, recreational facilities and trails, and open space comprising approximately 14 percent of the planning area. The Land Use and Community Design Element identifies the distribution, location, and intensity of all land use types throughout the City. To fully reflect the range of physical attributes that are important for San Marcos’s success, the Element also contains goals and policies to guide community form and design, and the provision of community facilities and urban services. The Land Use and Community Design Element is primarily implemented by the City’s Zoning Ordinance, which specifies districts and performance standards for various types of land uses described in the General Plan. Each General Plan land use designation has a corresponding zone or zones that implement and regulate the intent of the land use. The zone districts specify the permitted uses for each category and applicable development standards. The City’s Zoning Ordinance includes a Specific Plan Area (SPA) Zone, which provides the opportunity for a creative, comprehensive planning approach for the use and development of land through innovative building types and site design. This Zone affords flexibility to the developer in a context of City review that ensures comprehensive planning and the provision of necessary public services and facilities. Like other zones identified in the Zoning Ordinance, the SPA Zone is intended to implement and is consistent with the SPA land use designation of the General Plan.

The General Plan identifies the expected development capacity associated with the distribution of planned land uses specified in the Land Use Plan (Figure 2-5 of the Land Use and Community Design Element). Table 1, San Marcos General Plan Expected Residential Development Capacity, summarizes the expected development capacity for residential uses within San Marcos based on reasonable density assumptions for the City and SOI.

Table 1: San Marcos General Plan Expected Residential Development Capacity

Residential Land Use Designation	Density Range	Existing Acreage	Expected Development Capacity (Dwelling Units)
Agricultural/Residential	0.125-1.0	3,737.4	1,121.2
Hillside Residential 1	0.05-0.25	1,097.6	219.5
Hillside Residential 2	0.25-0.5	78	15.6
Rural Residential	1.0-2.0	783.1	783.1
Very Low Density Residential	2.1-4.0	1,130.5	3,391.4
Low Density Residential	4.1-8.0	799.8	3,998.9
Low Medium Density Residential	8.1-12.0	131.3	1,312.8
Medium Density Residential 1	12.1-15.0	91.6	1,190.1
Medium Density Residential 2	15.1-20.0	190.3	3,234.3
Medium High Density Residential	20.1-30.0	35.1	877.9
Mixed Use 1 (MU1)	20.1-30.0	90.8	3,812.7
Specific Plan Area (SPA)	N/A	3,576.7	21,855.3
<b>Total</b>			<b>41,812.8<sup>1</sup></b>
<p>Source: City of San Marcos General Plan Land Use and Community Design Element, Table 2-4; Specific Plan Area acreage provided by the City of San Marcos GIS Dataset, 2020.</p> <p>1. City of San Marcos General Plan Land Use and Community Design Element, Table 2-4 lists the total expected development capacity (in dwelling units) at 41,843 units. However, the total based on the sum of the capacity of each land use designation is actually 41,812.8 units.</p>			

### 3.3 CHARACTERISTICS OF PROPOSED PROJECT REVISIONS/ADDITIONS

The project analyzed in this Addendum involves the 2021-2029 Housing Element Update. The proposed amendment would not modify the City of San Marcos General Plan Land Use Map, land use designations, or intensities/densities identified within the General Plan Land Use and Community Design Element. No changes to the maximum development potential approved for the General Plan and analyzed in the General Plan FEIR would occur with the proposed amendment.

#### 3.3.1 HOUSING ELEMENT

In compliance with State Housing Element Law requirements, the City of San Marcos has prepared the 2021-2029 Housing Element (Project) to:

- Provide goals, policies, quantified objectives and scheduled programs to preserve, improve and develop housing
- Identify and analyze existing and projected housing needs for all economic segments of the community
- Identify adequate sites that are zoned and available within the 8-year housing cycle to meet the City's fair share of regional housing needs at all income levels
- Affirmatively further fair housing

- Be certified (approved) by the State Department of Housing and Community Development (HCD) as complying with State law
- Be internally consistent with other parts of the General Plan

## Housing Element Organization

The proposed Housing Element Update covers the October 15, 2021 through October 15, 2029 planning period and is comprised of the following components:

### Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan", which includes the goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments which comprise San Marcos. The Housing Plan includes only minor modifications to the City's current Housing Element Goals and Policies. The Housing Plan includes a number of new programs to address State housing law including future required updates to the San Marcos Municipal Code, new programs to support affirmatively furthering fair housing, and tracking and reporting requirements for Housing Sites.

### Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the "Background Report" which identifies the nature and extent of San Marcos' housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. The Background Report comprehensively updates the background context and conditions identified in the City's current Housing Element.

### Appendix A: Housing Sites Inventory

The Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level. The California Department of Housing and Community Development (HCD) requires that the Housing Sites Inventory be prepared using a State-approved format, included as Appendix A. No land use changes are proposed to accommodate the City's Regional Housing Needs Allocation (RHNA); future residential development is expected to occur in those areas already identified for residential uses including the Creek District and University District. All sites identified in the City's Housing Sites Inventory are currently identified for new development consistent with the potential development capacities identified in Appendix A.

### Appendix B: Public Engagement Summary

As part of the Housing Element Update the process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Public engagement was facilitated in both English and Spanish to further engage the San Marcos community. Public participation played an important role in the refinement of the City's housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public's input also helped to validate and expand upon the contextual information

included in Part 2: Background Report. The City's efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.

## Capacity to Meet Regional Housing Needs

As determined by SANDAG, the City of San Marcos' fair share allocation (RHNA) is 3,116 new housing units during this planning cycle. This includes: 728 units affordable to extremely/very low income households; 530 units affordable to low income households; 542 units affordable to moderate income households; and 1,316 units affordable to above moderate income households. State Income Limits which are used to determine affordability levels are set annually by the California Department of Housing and Community Development.

### Progress Towards the RHNA

RHNA uses June 30, 2020 as the baseline for growth projections for the 2021-2029 planning period. Jurisdictions may count toward the RHNA housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2020. Since this time, 546 housing units have been developed, are under construction, or have received their building permits in San Marcos. Jurisdictions may also count projects that are approved/entitled but not yet built or under construction; 1,039 units across all income categories have been approved/entitled and are expected to be developed within the planning period. Based on this progress, the City has already achieved approximately half of its overall RHNA with housing units constructed, under construction, or approved/entitled or under review (1,585 units). With these units taken into account, the City has fulfilled its allocation of moderate income units and has a remaining RHNA of 1,531 units (640 extremely low/ very low income units, 475 low income units, and 416 above-moderate income units after accounting for the surplus of moderate income units).

Table 2: Progress Towards the RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	728	530	542	1,316	3,116
Constructed, Under Construction/Permits Issued (Since 6/30/2020)	7	5	489	45	546
Units Approved/Entitled	81	50	409	499	1,039
Remaining Allocation	640	475	0 (with a surplus of 356 units)	416 (772 minus the surplus in the moderate income category)	1,531 <sup>1</sup>

Source: City of San Marcos, 2021, San Diego Council of Governments, 2020

1. The City has a surplus of units that have been built or are in the pipeline that are affordable to moderate income households, which can be used to accommodate a portion of the unmet need for above moderate income households.

[Residential Sites Inventory to Accommodate Remaining RHNA](#)

The City has sufficient land appropriately zoned for residential uses throughout the community to accommodate its remaining RHNA (1,531 units) for the 2021-2029 planning period. The City of San Marcos' 6th Cycle residential sites fall into four categories:

- 1) *Proposed development sites.* Five projects in various stages of planning are included as sites. The densities and unit counts proposed by these projects are realistic and consistent with similar projects which have been approved and successfully developed in San Marcos. The five sites are expected to yield 805 units.
- 2) *Accessory dwelling units.* ADUs are allowed on any lot that is zoned for single-family or multifamily dwelling residential use, including lots that are zoned for such use within a Specific Plan Area (SPA). The City has taken an average of the annual number of ADUs constructed over the past three years (5.66 units), and multiplied that by 8 years to arrive at a reasonable expectation of how many new ADUs will likely be constructed during the planning period, at a minimum. Development of ADUs is expected to yield 48 units.
- 3) *Residentially zoned vacant land exclusive of Specific Plan areas.* The inventory of vacant residential land between 0.50 acres and 10 acres in size (exclusive of those in proposed/tentative developments and specific plan areas) in San Marcos totals 379.4 acres. The majority of these vacant parcels are designated for above-moderate development. These vacant properties have the potential to yield 648 units.
- 4) *Mixed use sites in Specific Plans.* Several Specific Plans in San Marcos have remaining residential capacity. Two Specific Plans offer residential development opportunities in a higher-density, mixed use environment: the San Marcos Creek District Specific Plan and the University District Specific Plan. Although the two specific plans combined offer opportunities for development of up to 5,700 units, for the purpose of this Housing Element and reflecting the remaining units needed to meet the City's assigned housing need, only vacant residential mixed use parcels greater than 0.50 acres and less than 10 acres within the Plan boundaries are included in this portion of the sites inventory. Moreover, although a density of at least 30 du/ac is permitted throughout the Specific Plan areas, only 50% of the total potential yield has been identified to accommodate the City's RHNA to account for the potential for mixed-use and non-residential development on a portion of the sites. Based on this methodology, vacant mixed use sites in Specific Plans have the potential to yield 1,592 units.

Table 3: Comparison of RHNA Candidate Sites Realistic Capacity and RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
Remaining 6th Cycle RHNA	640	475	0	416	1,531
Proposed Developments	49	187	561	8	805
ADUs	-	-	-	48	48
Vacant Land Inventory (exclusive of SPAs)	33	34	-	581	648
Vacant Land in Mixed-Use Specific Plans	796*	796*	-	-	1,592
Total	+238 (surplus)	+542 (surplus)	+561 (surplus)	+221 (surplus)	+1,562 (surplus)

Note: The realistic capacity analysis of vacant land in mixed-use specific plans assumes that only 50% of the potential capacity of development at 30 du/ac would be realized. If the sites develop closer to their full capacity, which has been realized as part of past projects, the City's surplus of units affordable to lower-income households would be significantly higher

## Summary of Housing Element Modifications

As previously noted, State law requires that the Housing Element be reviewed and updated not less than every eight years, in order to remain relevant and useful, and reflect a community's changing housing needs. The proposed Housing Element Update involves minor changes/additions to the Housing Element and environmental conditions under which it would be implemented. The following summarizes the modifications to the Housing Element, as compared to the 2013-2021 Housing Element:

### Goals, Policies, and Programs (Part 1: Housing Plan)

The City made minor modifications to the Goals and Policies included in the Housing Element to reflect the City's current housing needs and State mandates.

The following programs were excluded from this 2021-2029 Housing Element, because they were no longer relevant (had already been accomplished) or were replaced with current objectives.

- Current Program 6: San Diego Regional Mortgage Credit Certificates
- Current Program 13: VIBE

The following additions and modifications are included in this 2021-2029 Housing Element:

- Proposed Policy 2.5: Reuse of sites in the City's housing sites inventory
- Proposed Goal 5: Modified to affirmatively further fair housing
- Proposed Policy 5.3: Modified to affirmatively further fair housing
- Proposed Program 2: Maintain Adequate Sites Throughout the Planning Period
- Proposed Program 3: Public Property Conversion to Housing Program
- Proposed Program 4: Replacement of Affordable Units
- Proposed Program 5: Facilitate Affordable and Special Needs Housing Construction
- Proposed Program 9: Accessory Dwelling Units
- Proposed Program 10: Density Bonus Implementation Program

- Proposed Program 11: California Accessibility Standards Compliance Program
- Proposed Program 18: Energy Conservation and Energy Efficiency Opportunities
- Proposed Program 19: Lead Based Paint Education and Reduction Program
- Proposed Program 21: Zoning Code Amendments – Housing Constraints
- Proposed Program 23: Affirmatively Furthering Fair Housing Outreach and Coordination
- Proposed Program 24: Economic Displacement Risk Analysis
- Proposed Program 25: Barriers to Racial and Ethnic Equity

All other Goals, Policies and Programs are reflective of the City's current Housing Element with limited or no modifications to reflect current conditions.

#### [Background Information \(Part 2: Background Report\)](#)

The Background Report of the Housing Element has been comprehensively updated to include current information. This section of the Housing Element includes: Introduction, Accomplishments Under 5<sup>th</sup> Cycle Housing Element, Housing Needs Assessment, Affirmatively Furthering Fair Housing Analysis, Constraints, Housing Resources, Other Requirements, and References.

#### [Appendix A: Housings Sites Inventory](#)

The City has updated its Housing Sites Inventory to demonstrate capacity to accommodate its 2021-2029 RHNA. The Housing Sites Inventory includes a list of sites appropriate to accommodate the RHNA at the appropriate densities and income levels and includes sites identified in the Current Housing Element and other sites designated for residential or mixed-use development consistent with the City's General Plan, Zoning Ordinance, and Specific Plans. No land use changes are proposed as part of the 2021-2029 Housing Element.

#### [Appendix B: Public Engagement Summary](#)

The public engagement program conducted as part of the Housing Element Update project is summarized in Appendix B.



*Figure 1: Regional Location Map*

*Figure 2: General Plan Planning Area*

## **4 ENVIRONMENTAL ANALYSIS**

This Addendum has been prepared to determine whether the proposed Project would result in any new or substantially increased significant environmental impacts in comparison to the approved project as analyzed in the previously certified General Plan FEIR. This section of the Addendum provides analysis and cites substantial evidence that support's the City's determination that the proposed Project does not meet the criteria for preparing a subsequent or supplemental EIR under CEQA Guidelines Section 15162.

The scope of the City's review of the proposed Project is limited by provisions set forth in CEQA and the State CEQA Guidelines. This review is limited to evaluating the environmental effects associated with the proposed Project to the General Plan Project as set forth in the FEIR. This Addendum also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the FEIR was certified. This evaluation includes a determination as to whether the changes proposed by the Project would result in any new significant impacts or a substantial increase in a previously identified significant impact.

The section is patterned after the CEQA Guidelines Appendix G Checklist and provides a summary of impacts associated with the proposed actions, as described in the FEIR, and includes an analysis of the potential impacts associated with the proposed 2021-2029 Housing Element Update. This comparative analysis provides the City with the factual basis for determining whether any changes in the Project, any changes in circumstances, or any new information since the FEIR was certified would require additional environmental review or preparation of a Subsequent EIR or Supplemental EIR.

## 4.1 AESTHETICS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Except as provided in Public Resources Code Section 21099, would the project:						
a. Have a substantial adverse effect on a scenic vista?				X		
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?						X
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X		
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X		

### General Plan FEIR Conclusions

- Over the life of the General Plan, new development and redevelopment are expected to result in a general intensification of the planning area and has the potential to disrupt scenic vista resources such as hillsides, ridgelines, and open space. Infill development of vacant parcels and general intensification of development may limit some viewsheds of hills or reduce the feeling of open space surrounding the central core of planning area. There are no State scenic highways within or adjacent to the planning area. Lastly, new development pursuant to the General Plan may increase the amount of light and glare within the planning area with a potential to influence light levels affecting the Palomar Observatory.
- Implementation of the General Plan would result in general intensification of the planning area. Impacts to scenic vistas and resources would be significant. Measures AES-1 and AES-2 would reduce impacts associated with scenic vistas and resources; and the program level impacts would be reduced to less than significant.

### Analysis of Modified Project

There are no State scenic highways within the General Plan planning area (planning area); therefore, as concluded in the General Plan FEIR, no impacts would occur. The Project does not propose site-specific development, but is rather an update to a policy document to comply with

new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the City. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to aesthetic resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing General Plan policies protecting aesthetic and visual resources. The San Marcos General Plan includes policies and programs to reduce potential impacts to scenic vista resources and to reduce impacts associated with light and glare as a result of new development. Further, General Plan FEIR Mitigation Measures AES-1 and AES-2 requires preservation of unique or special visual features and implementation of the City's Ridgeline Ordinance to reduce potential impacts to aesthetic resources.

The revisions to the Housing Element would not result in new aesthetic impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to aesthetics as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

AES-1 Require proposed development within visually sensitive areas through the City's Ridgeline Ordinance and Specific Plans to minimize visual impacts and to preserve unique or special visual features through the application of techniques, such as:

- Creative site planning
- Integration of natural features into the project
- Use of appropriate scale, materials, and design to complement the surrounding natural landscape
- Minimal disturbance of topography
- Allow clustering of development through Specific Plans so as to preserve a balance of open space vistas, natural features, and community character.
- Creation of contiguous open space networks
- Requiring development to be consistent with the updated, energy-efficient Dark Sky Ordinance
- Require development to comply with the Ridgeline Overlay Zone
- (Implementation Program COS-3.1)

AES-2 Continue to implement and monitor the City's Ridgeline Ordinance to ensure achievement of the desired effect. (Implementation Program LU-5.2)

## 4.2 AGRICULTURE AND FORESTRY RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X		
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X		
c. Result in the loss of forest land or conversion of forest land to non-forest use?						X
d. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X		

### General Plan FEIR Conclusions

- Implementation of the General Plan would not result in conversion of Farmland; thus impacts are considered less than significant.
- Implementation of the San Marcos General Plan would result in significant impacts related to conflict with agricultural zoning. Implementation Mitigation Measure AGR-1 would eliminate conflicts with existing agricultural zoning. Impacts would be reduced to less than significant.
- Implementation of the General Plan would not affect the status of two parcels currently under Williamson Act contract. Impacts are considered less than significant.

### Analysis of Modified Project

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or affect any parcels under a Williamson Act contract.

Subsequent to adoption of the FEIR, amendments to the CEQA Guidelines resulted in the addition of forestry resources as a topical area to be addressed within CEQA Guidelines Appendix G. There are no forest lands located within the General Plan study area. Additionally, the General Plan area is not designated or zoned as forest land. No impacts related to this environmental topic were anticipated as a result of implementation of the General Plan, and no mitigation measures were required.

The revisions to the Housing Element would not result in new agricultural or forestry resource impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to agriculture and forestry resources as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

AGR-1 Upon adoption of the General Plan, the City shall amend/update the City's existing Zoning Ordinance to be consistent with the General plan. This update shall occur within 12 months of General Plan adoption. (Implementation Program LU-1.1)

### 4.3 AIR QUALITY

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Conflict with or obstruct implementation of the applicable air quality plan?				X		
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				X		
c. Expose sensitive receptors to substantial pollutant concentrations?				X		
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X		

## General Plan FEIR Conclusions

- Future development in the City of San Marcos would generate Vehicle Miles Traveled (VMT) and associated emissions of ozone precursors and particulate matter (PM). Future development would also be required to demonstrate compliance with the strategies and measures adopted as part of the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP) during the environmental review process, as well as with the requirements of San Diego County Air Pollution Control District (SDAPCD) to reduce emissions of particulate matter. The City of San Marcos will continue to coordinate with SANDAG and SDAPCD to ensure that all new local land use decisions are incorporated into regional planning and air quality plan updates. Based on the requirements for consistency with emission control strategies in the RAQS and SIP, the General Plan would not conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP. The General Plan is consistent with SDAPCD current air quality planning efforts; therefore, this impact would be less than significant.
- Operational and construction-related emissions require mitigation to prevent violation of air quality standards under the General Plan, while air quality impacts to sensitive receptors and from odors under the General Plan will not be significant given compliance with existing plans and regulations.

## Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce impacts to air quality as a result of new development and would be required to implement General Plan FEIR Mitigation Measures to reduce potential impacts to air quality due to construction-related emissions and operational activities by reviewing future development proposals for potential regional and local air quality impacts per CEQA and, if identified, require mitigation to reduce the impact to a level less than significant, where feasible; continue to update the Green Building Ordinance and Building Code; partner with private industry to incorporate renewable energy features in commercial, business park, and industrial developments; and implement the Regional Air Quality Strategy. General Plan FEIR Mitigation Measure AQ-6 also requires preparation of a health risk assessment during review of proposed development within 500 feet of SR-78 or other sensitive receptors in order to reduce potential impacts to air quality.

The revisions to the Housing Element would not result in new air quality impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to air quality as a result of the proposed Project.



General Plan FEIR Mitigation Measures:

AQ-1 Reduce Construction-Related Emissions. The City and project contractors shall implement the following measures during all construction activities involving demolition or exterior construction. Furthermore, a fugitive dust control plan shall be developed and approved by SDAPCD for all projects prior to issuance of a grading permit and commencement of construction activities. The dust control plan shall specifically identify measures that would minimize generation of fugitive dust from all construction activities. In addition, the following standard measures shall be implemented:

- Comply with and implement all applicable SDAPCD rules and regulations that pertain to construction activities (e.g., asphalt paving ROG requirements, administrative requirements, fugitive dust management practices). Implement all construction-related requirements recommended by the air district or local government.
- Conduct water as necessary to prevent visible dust emissions.
- Apply water, nontoxic chemical stabilizers, or dust suppressants, or use tarps or other suitable material in all disturbed areas that will not be utilized for 10 days or more.
- Prevent carryout and track out of fugitive dust on construction vehicles. Methods to limit carryout and track include, but are not limited to, using wheel washers and/or metal tracks at the site egress(es), sweeping any track out on adjacent public streets at the end of each workday, and lining access points with gravel, mulch, or wood chips.
- Cover or wet the filled cargo compartment of all transport trucks to limit visible dust emissions during transport, and maintain at least 2 feet of freeboard space from the top of a container.
- Install sandbags or other erosion control measures on sites with a slope greater than 1% to prevent silt runoff to public roadways.
- Maintain all construction equipment according to the manufacturers' specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.
- Minimize idling time either by shutting off equipment when it is not in use or reducing the time of idling to no more than 5 minutes. Provide clear signage regarding idling at site access points.
- Use alternative fueled (e.g., compressed natural gas [CNG], liquefied natural gas [LNG], propane), or electric-powered construction equipment where feasible.
- Use equipment with diesel oxidation catalysts, catalyzed diesel PM filters, or other applicable air district-approved emission reduction retrofit devices where feasible.

AQ-2 Review future development proposals for potential regional and local air quality impacts per CEQA. If potential impacts are identified, mitigation will be required to reduce the impact to a level less than significant, where feasible. (Implementation Program COS-4.1)

AQ-3 Periodically upgrade the Green Building Ordinance and requirements as mainline construction practices develop, and new materials and building products become available, with the goal of meeting the state's Net Zero Energy goals by the year 2020 (Implementation Program COS-4.5), and continue to update the Green Building Ordinance and Building Code as required by the state.

AQ-4 Partner with private industry (e.g., solar technology providers) to incorporate renewable energy features in commercial, business park, and industrial developments. (Implementation Program COS-4.8)

AQ-5 Implement the Regional Air Quality Strategy. The City shall work with SDAPCD and SANDAG to implement the RAQS and meet all federal and State air quality standards for pollutants. The City shall participate in any future amendments and updates to the RAQS. The City shall also implement, review, and interpret the proposed General Plan and future discretionary projects in a manner consistent with the RAQS to meet standards and reduce overall emissions from mobile and stationary sources.

AQ-6 Require preparation of a health risk assessment during review of proposed development within 500 feet of SR-78 or other stationary sources producing toxic air contaminants, where environmental review under CEQA indicates the need to identify health issues, reduce exposure to sensitive receptors, and/or to implement alternative approaches to development that reduce exposure to toxic air contaminant sources to levels recommended by the California Air Resources Board guidelines.

## 4.4 BIOLOGICAL RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X		
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X		
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X		
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X		

## General Plan FEIR Conclusions

- Development associated with implementation of the General Plan could result in significant impacts to biological resources because the biological profile of the planning area includes identified presence of listed species, regionally mapped and protected critical habitat areas, watershed features, and related vegetation communities. Specifically, the San Marcos Creek watershed would likely be both directly and indirectly impacted by construction or redevelopment within the Urban Core Focus Areas. Development and redevelopment in this area could also impact MHCP-mapped critical habitat areas for thread-leaved brodiaea, spreading navarretia, and San Diego fairy shrimp. Furthermore, future residential development is permitted under the General Plan in MHCP-mapped critical habitat areas for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) associated with Diegan coastal sage scrub habitats. In addition to the impacts on MHCP-mapped critical habitat, the intensification of development could also result in increased noise levels throughout the City. An increase in noise levels has the potential to affect behavioral and physiological responses in noise-sensitive wildlife receptors. This is considered a significant but mitigable impact.

## Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to biological resources and General Plan FEIR Mitigation Measures BR-1 through BR-10 would reduce potential impacts to less than significant. More specifically, General Plan FEIR Mitigation Measures BR-1, BR-2, BR-3, BR-4, and BR-5 contain provisions to conserve and protect sensitive and unique habitat, require biological assessment in sensitive and regulated habitat areas, require new development to provide adequate on and off-site stormwater and flood management facilities, and require project-specific review under CEQA; Mitigation Measures BR-6 and BR-7 ensures the City continues to work with State and federal agencies to protect areas with rare or endangered species and to require mitigation for California gnatcatcher and Least Bell's Vireo; and Mitigation Measures BR-8, BR-9, and BR-10 require developers to assist wildlife movement when necessary and mitigate impacts to wetlands and waters, upland, riparian and wetland vegetation communities and sensitive plant species. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce impacts to biological resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing General Plan policies protecting biological resources.

The revisions to the Housing Element would not result in new biological resource impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to biological resources as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

BR-1 Conservation of lands in USFWS-mapped gnatcatcher critical habitat shall be consistent with MHCP, may be located either onsite or offsite so long as the conserved land contributes to the unincorporated core area adjacent to the MHCP south of San Marcos, or other areas as approved by the regulatory agency.

BR-2 As development occurs, the City shall work to maintain and protect sensitive and unique habitat areas identified by the regulatory agencies in accordance with the City goals and policies. (Implementation Program COS-1.1)

BR-3 Prior to development approval, require a biological assessment be performed by a qualified biologist in sensitive and regulated habitat areas where rare and endangered species are known or reasonably expected to be present. (Implementation Program COS-1.2)

BR-4 As a condition of project-specific approval, the City shall require new development and redevelopment to provide adequate on-site and off-site stormwater and flood management facilities to control direct and indirect erosion and discharges of pollutants and/or sediments. To determine the facility and BMP needs, the City will require, when necessary, a hydrological/drainage analysis be performed by a state-licensed and City-approved engineer, with the cost of said analysis the responsibility of the project applicant.

BR-5 Activities implemented under the General Plan will undergo project-specific review for potential impacts to biological resources in accordance with CEQA. The City of San Marcos shall require that all General Plan implementation activities adhere to California and federal legislation that protects all sensitive plants, wildlife, habitats, waters, and wetlands. The City shall work closely with the USACE, RWQCB, USFWS, and CDFG during the discretionary project permitting and CEQA review of any project that may result in the alteration of a stream bed, involve the removal of vegetation in wetland and riparian habitats, disturb waters of the U.S. or otherwise impacts sensitive biological resources. If recommended or required by the resource agencies, project-specific measures to mitigate potential impacts to sensitive species, such as California gnatcatchers, native birds, San Diego fairy shrimp or other listed or sensitive species occurring in the project boundaries, will be established as conditions of project approval. Mitigation measures for habitat and species may include but are not limited to, avoidance, minimization, enhancement, restoration, land preservation, or a combination of any of these.

BR-6 Continue to work with state and federal resource agencies (e.g., California Department of Fish and Game (CDFG)), U.S. Army Corps of Engineers, and United States Fish and Wildlife Service (USFWS)) to protect areas containing rare or endangered species of plants and animals. (Implementation Program: COS-1.3)

BR-7 Mitigation shall be required as outlined below for California gnatcatcher, and least Bell's vireo for any grading or clearing activities in areas where there is potential to impact these species (California gnatcatcher, MHCP habitat only).

Prior to issuance of any authorization to proceed, the City, or appointed designee, shall verify that the MHCP boundaries and the following project requirements regarding the above listed species are shown on the grading and building permit plans:

1. No clearing, grubbing, grading or other construction activities shall occur between the following breeding seasons for the project-impacted species:
  - a. March 1 and August 15, the breeding season for the California gnatcatcher
  - b. March 15 and September 15, the breeding season of the least Bell's vireo
2. A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey habitat areas (only within the MHCP for gnatcatchers) that would be subject to the construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the California gnatcatcher, and least Bell's vireo. Surveys for these species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction.
  - a. If the aforementioned avian species are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Person and applicable resource agencies which demonstrate whether or not mitigation measures such as noise walls are necessary during the applicable breeding seasons as follows:
    - i. If this evidence indicated the potential is high for the aforementioned avian species to be present based on historical records or site conditions, then Condition 1-b or 1-c shall be adhered to as specified above.
    - ii. If this evidence concludes that no impacts to the species are anticipated, no new mitigation measures are necessary.
  - b. If the above listed species are present, then the following conditions must be met during the above listed breeding seasons per species:
    - i. No clearing, grubbing, or grading of occupied habitat shall be permitted within the habitat. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; AND
    - ii. No construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of the occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of the occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City at least two weeks prior to the commencement of construction activities; OR
    - iii. At least two weeks prior to the commencement of clearing, grubbing, grading and/or any construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g. berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the aforementioned species avian species. Concurrent with the

commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB (A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the appropriate breeding season.

- c. If the permittee begins construction prior to the completion of the protocol avian surveys, then the Development Services Department shall assume that the appropriate avian species are present and all necessary protection and mitigation measures shall be required as described in 1 a, b and c.

BR-8 During the design and CEQA review of individual projects, the City shall require developers to provide for continued movement of wildlife by assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are identified in this document, adopted HCP/NCCPs, or movement studies that identify evidence of wildlife movement. Bridges and/or other undercrossings that allow continued movement of wildlife shall be incorporated where roads or transit features would create barriers to wildlife movement and use of nursery sites. Size-class-specific crossing structures shall be evaluated for each species to ensure that crossings are functional for movement. Directional fencing shall be considered to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, the fence should extend and angle away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, one-way gates should be used so animals that do get around fence end runs can safely exit roadways.

BR-9 Mitigation is required for MHCP covered species by Section 404 permits (including ESA Section 7 consultations). Any unavoidable impacts to wetlands or waters (including vernal pools) must be mitigated to result in no net loss of wetland vegetation acreage and biological function and value within the MHCP subregion, preferably within the City of San Marcos and same drainage system.

BR-10 Permanent and temporary project impacts on upland, riparian and wetland vegetation communities and sensitive plant species shall be consistent with established ratios in the MCHP region and the objectives of the draft City of San Marcos Subarea Plan. Mitigation shall be completed through onsite preservation, off-site acquisition of mitigation land located in the region, habitat restoration that increases the habitat quality and biological function of the site or monetary compensation to acquire, maintain and administer the preservation of sensitive biological resources.

## 4.5 CULTURAL RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				X		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				X		
c. Disturb any human remains, including those interred outside of formal cemeteries?				X		

### General Plan FEIR Conclusions

- Prehistoric and historical archeological sites are known to exist within the planning area and other archeological sites are likely to be found. This is considered a significant but mitigable impact. No ethnographic resources were identified in the planning area which is considered a less than significant impact.
- Historic resources are known to exist within the planning area and additional historic resources may also be present. Although implementation of the General Plan would not direct destruction of, or damage to, historical resources, future land uses and infill development permitted under the General Plan could result in changes that affect historic structures or the historic character of neighborhoods or districts. This is considered a significant but mitigable impact.
- The potential for encountering human remains during construction development activities is possible and impacts to human remains may occur.

### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to historic and archeological resources and human remains. Further, General Plan FEIR Mitigation Measures CR-1, CR-2, CR-3, and CR-4 requires review and/or site survey prior to ground-disturbing activities, monitoring by a qualified archeologist during certain development projects, and/or evaluation of discovered cultural resources by a qualified archaeologist to avoid or minimize impacts to archaeological or cultural resources. General Plan



FEIR Mitigation Measures CR-5 and CR-6 requires enforcement of historic preservation laws and consultation with appropriate individuals or organizations to minimize potential impacts to historic and cultural resources that may occur at the result of a proposed project. General Plan FEIR Mitigation Measures CR-7 and CR-8 requires, the relocation of historic structures to the historic Heritage Park section of Walnut Grove Park, when feasible, and/or feasible project-level mitigation to specific development projects that would disturb a historic structure listed or eligible to be listed in the NRHP, the CRHR, or the San Diego County Local Register of Historical Resources. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to cultural resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing General Plan policies protecting cultural resources.

The revisions to the Housing Element would not result in new cultural resource impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to cultural resources as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

CR-1 During CEQA review of potential new development projects, the City shall require any potential new development project involving grading, ground-disturbing, and other major earth-moving activities to conduct a review of literature and historic maps and a records search to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event that the records indicate that no previous survey has been conducted, the project implementer shall have a qualified cultural resource specialist conduct a survey of the project area. Specifically, the report shall explicitly state the results of the literature study and site survey. In addition, the City shall consult the Native American Heritage Commission and any and all area Tribes that have filed a claim in the Sacred Lands Inventory to identify potential places of cultural and/or religious importance or sites that may contain other cultural resources. Resources that cannot be avoided will need to be evaluated, and if found significant, will require project-level mitigation prior to project approval.

CR-2 During the planning, design, and environmental review phases of individual development projects the City shall require the project implementer to incorporate design measures in engineering documents to provide avoidance or minimization of impacts to significant archaeological or cultural resources. Archaeological or cultural resource sites identified as significant shall be avoided or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines.

Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Suggested capping methods should be communicated to interested Tribes for their review and Tribal recommendations shall be considered to the maximum extent feasible as capping plans

are finalized. Passive uses for capped sites include trails, picnic areas, and play areas. Capped areas should not contain asphalt or landscaping with invasive root systems.

CR-3 During construction of specific development projects, the City shall require monitoring of grading, ground-disturbing, and other major earth-moving activities in previously undisturbed areas or in areas with known archaeological resources projects by a qualified archeologist and Tribal monitor during activities in areas with cultural resources of interest to local Native American Tribes. Both the archaeologist and tribal monitor shall observe grading, ground-disturbing, and other major earth-moving activities.

CR-4 The City shall require a qualified archaeologist to evaluate any cultural resources discovered during site construction activities, and the Tribal monitor will accompany a qualified archeologist to identify, and determine the significance of, cultural resources and/or sacred lands.

Should an archaeological deposit and/or feature be encountered during construction activities, an Archaeological Data Recovery Program shall be prepared and implemented with consultation with interested Native American Tribes. Both the archeologist and Tribal monitor should strive for agreement on the determined significance of an artifact or cultural resource. Once in agreement, either the archeologist or Tribal monitor may divert or halt ground-disturbing activities for the purposes of implementing a data recovery program. A data recovery program for archaeological sites consists of excavation of a percentage of the site, determined in consultation with the project implementer, to provide information necessary to answer significant research questions.

All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with interested Tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring.

The qualified archaeologist will apply mitigation measures prior to resuming construction work. Local Native American Tribes shall be consulted in the identification of mitigation measures to address impacts consistent with California requirements, including provisions to address inadvertent discoveries.

CR-5 The City shall work with state, and federal agencies to apply and enforce historic preservation laws, including the adopted Mills Act, regulations, and codes including the California Historical Building Code and other state laws resources to ensure the adequate protection of resources when analyzing a proposed project (Implementation Program COS-8.1).

CR-6 The City shall require consultation for itself and project implementers with the appropriate organizations and individuals (e.g., Information Centers of the California Historical Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), and Native American groups and individuals) to minimize potential impacts to historic and cultural resources that may occur at the result of a proposed project (Implementation Program COS-8.2).

CR-7 Where feasible, the City shall require the relocation of historic structures to the historic Heritage Park section of Walnut Grove Park to protect them from impacts resulting from a proposed project (Implementation Program COS-8.3).

CR-8 Prior to construction of specific development projects that would disturb a historic structure listed or eligible to be listed in the NRHP, the CRHR, or the San Diego County Local Register of Historical Resources, the City shall require the development of feasible project-level mitigation measures, identified in consultation with the State Historic Preservation Office when appropriate, to avoid or substantially reduce impacts to significant cultural resources. Feasible project-level mitigation measures include maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which will be conducted in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

## 4.6 ENERGY

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X		
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X		

### General Plan FEIR Conclusions

This topic is addressed within Section 3.14, Public Services, Utilities, and Energy in the General Plan FEIR.

- Future land uses consistent with the proposes General Plan would increase energy consumption in the planning area, requiring that additional energy resources be delivered to residents and businesses by San Diego Gas and Electric (SDG&E). Future projects proposed consistent with the General Plan would be required to complete an environmental review process which would assess whether SDG&E can accommodate the energy needs of that project. In addition, future development would be required to comply with the current energy performance standards found in Title 24 as well as General Plan energy conservation policies and actions. This is considered a less than significant impact.

### **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to energy resources. In addition, the Housing Element includes a new program, Program 18: Energy Conservation and Energy Efficiency Opportunities, which promotes energy-efficient standards and programs to assist homeowners and property owners of all income levels. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to energy resources. The Housing Element policies and programs would not have an impact on existing General Plan policies addressing energy resources.

The revisions to the Housing Element would not result in new energy resource impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to energy resources as a result of the proposed Project.

## 4.7 GEOLOGY AND SOILS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:						
<ul style="list-style-type: none"> <li>Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</li> <li>Strong seismic ground shaking?</li> <li>Seismic-related ground failure, including liquefaction?</li> <li>Landslides?</li> </ul>				X		
b. Result in substantial soil erosion or the loss of topsoil?				X		
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X		
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X		
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X		
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X		

## General Plan FEIR Conclusions

- The planning area is not located within a designated Alquist-Priolo fault zone. Active or potentially active faults within proximity may potentially cause shaking in the planning area. Liquefaction areas are primarily limited to minor areas within the planning area. Within the planning area, an extremely limited area registers as having a “moderate” soil slip susceptibility.
- As with all development activities, there is a potential for the increase of soil erosion in the area as a result of vegetation removal, grading and development activities or earth scorching resulting from urban or wildland fires within the planning area. However, no actions are prescribed by the General Plan that would specifically increase these events or soil erosion. City plans such as the CWPP and regulatory ordinances for landscaping and grading would lessen the potential.
- No actions are prescribed by the General Plan that would specifically locate a project or development on an area of unstable geologic units, nor does it alter the City’s existing approach to development foundations, excavation or hillside grading.
- Geotechnical reports indicate expansive clays occur in the soils covering the older alluvial deposits and all bedrock formations in the hillside areas and the upper reaches of canyons where colluvium is present. The most likely locations for collapsible soils are the current and pre-development washes and drainage channels, particularly San Marcos Creek valley and Twin Oaks Valley drainages.
- Historically, soils have been sufficient to handle use of septic systems based on City of San Marcos engineering standards. City policies do not prohibit the use or expansion of septic systems. Implementation of the General Plan would not impact the soils or the engineering standards for septic.
- The San Marcos planning area is not located within an area specifically identified by the California Department of Mines and Geology as having substantial mineral resources and no known mineral resource recovery sites of local importance are included in the General Plan or any other specific land use plan associated with the planning area.
- With adherence to and implementation of the General Plan policies, City regulations, codes and ordinances, and implementation of existing federal, state, and local laws and regulations concerning building construction and hazard mitigation, these effects are considered a less than significant impact.

## Analysis of Modified Project

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City’s RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts associated with geology and soils. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with geology and soils, including preparation of site-specific

geotechnical analysis and required compliance with the San Marcos Municipal Code. The Housing Element policies and programs would not have an impact on existing General Plan policies regarding geology and soils.

The revisions to the Housing Element would not result in new impacts to geology and soils beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to geology and soils as a result of the proposed Project.

## 4.8 GREENHOUSE GAS EMISSIONS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				X		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X		

### General Plan FEIR Conclusions

- Construction-related greenhouse gas (GHG) emissions would be primarily short-term in the form of CO<sub>2</sub>. This is considered a significant but mitigable impact. Operational GHG emissions may be both direct and indirect emissions and would be generated by area, mobile, and stationary sources. This is considered a significant and unavoidable impact.
- The General Plan would not conflict with the AB 32 Scoping Plan, or any other plans, policies, or regulations for the purpose of reducing GHG emissions. Neither the City nor any other agency with jurisdiction over this project has adopted climate change or GHG reduction measures with which the General Plan would conflict. This is considered a less than significant impact.

### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos

General Plan, would be reviewed for consistency with policies and programs aimed to reduce GHG emission impacts as a result of new development and would be required to implement General Plan FEIR Mitigation Measures to reduce potential impacts due to construction-related emissions and operational activities. More specifically, GHG-1 requires projects seeking discretionary approval to reduce construction-generated GHG emissions; GHG-2 and GHG-6 encourage recycling; GHG-3 seeks to update California Green Code and San Marcos Green Building Ordinance; GHG-4 seeks partnerships to incorporate renewable energy features into projects; GHG-5 require project applicants to consider and implement measures to reduce GHG emissions; GHG-7 allows for public education on recycling efforts; GHG-8, GHG-9, and GHG-10 deal with water districts and purveyors to reduce water use and increase water supply, and; GHG-11 calls on the city to develop a Climate Action Plan for reducing GHG to meet state requirements.

The revisions to the Housing Element would not result in new GHG emission impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to GHG emissions as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

GHG-1 To reduce construction-generated GHG emissions, projects seeking discretionary approval from the City shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SDAPCD at the time individual portions of the site undergo construction.

The project applicant(s) for any particular discretionary project may submit a report to the City that substantiates why specific measures are considered infeasible for construction of that particular discretionary project and/or at that point in time. By requiring that the list of feasible measures be established prior to the selection of a primary contractor, this measure requires that the ability of a contractor to effectively implement the selected GHG reduction measures be inherent to the selection process.

The recommended measures for reducing construction-related GHG emissions at the time of writing this EIR are listed below. The list will be updated as new technologies or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following:

- Improve fuel efficiency of construction equipment;
  - reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort);
  - perform equipment maintenance (inspections, detect failures early, corrections);
  - train equipment operators in proper use of equipment;
  - use the proper size of equipment for the job; and
  - use equipment with new technologies (repowered engines, electric drive trains).
- Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power.
- Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment. Emissions of NOX from the use of low carbon fuel must be



reviewed and increases mitigated. Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program.

- Reduce electricity use in the construction offices by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Recycle or salvage nonhazardous construction and demolition debris.
- Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials).
- Develop a plan to efficiently use water for adequate dust control. This may consist of the use of nonpotable water from a local source.

GHG-2 As a part of a contractor demolition package, require 25% of non-hazardous debris (excluding excavated soil and land-clearing debris) to be recycled or salvaged. Work with contractors to share best practices on building recycling and reuse and demolition techniques to minimize waste, dust generation, water and energy use and other impacts of construction and demolition work. (Implementation Program COS-7.4)

GHG-3 Upgrade the California Green Code and the San Marcos Green Building Ordinance requirements in a regular and timely manner as mainline construction practices develop and new materials and building products become available with the goal of meeting the state's Net Zero Energy goals by the year 2020. (Implementation Program COS-4.5)

GHG-4 Partner with private industry (e.g., solar technology providers) to incorporated renewable energy features in commercial, business park, and industrial developments. (Implementation Program COS-4.8)

GHG-5 GHG emission reduction strategies and their respective feasibility are likely to evolve over time. The applicants for projects developed as part of the General Plan shall consider and implement, as feasible, the following nonexclusive and nonexhaustive list of measures. These measures are derived from multiple sources, including Appendix B of the California Air Pollution Control Officer's Association (CAPCOA) white paper, CEQA & Climate Change (CAPCOA 2008); CAPCOA's Quantifying Greenhouse Gas Mitigation Measures. A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures (CAPCOA 2010); the California Attorney General's Office publication entitled The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level (California Attorney General's Office 2008); and the BAAQMD's CEQA Guidelines (BAAQMD 2010).

#### *Energy Efficiency*

- Install clean alternative energy features to promote energy self-sufficiency (e.g., photovoltaic cells, solar thermal electricity systems, small wind turbines).
- Install solar water heaters.
- Encourage the use of smart meters and require programmable thermostats.
- Require HVAC duct sealing and periodic inspection.

- Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use. Plant shade trees within 40 feet of the south sides or within 60 feet of the west sides of properties.
- Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Maximize daylight as an integral part of lighting systems in all buildings.
- Install cool roof materials (albedo  $\geq 30$ ).
- Install light-colored "cool" pavements, and strategically locate shade trees along all bicycle and pedestrian routes.

#### *Water Conservation and Efficiency*

- With the exception of ornamental shade trees, use water-efficient landscapes with native, drought-resistant species in all public areas and commercial landscaping. Use water-efficient turf in parks and other turf-dependent spaces.
- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Design buildings and lots to be water-efficient. Only install water-efficient fixtures and appliances.
- Consider restricting watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff. Prohibit businesses from using pressure washers for cleaning driveways, parking lots, sidewalks, and street surfaces. These restrictions should be included in the Covenants, Conditions, and Restrictions of the community.
- Provide education about water conservation and available programs and incentives.

#### *Solid Waste Measures*

- Provide interior and exterior storage areas for recyclables, food waste, and green waste at all buildings; create food waste and greenwaste curbside pickup.
- Provide adequate recycling containers in public areas, including parks, school grounds, and pedestrian zones in areas of mixed-use development.

GHG-6 Continue to implement a full complement of City programs that encourage and accommodate recycling of a broad range of materials, including, but not limited to, the following:

- Curbside commingled recycling
- Curbside green waste recycling
- Waste motor oil collection
- Waste motor oil and commingled recycling drop off
- Sharp objects/needles medical recycling
- Electronic appliance recycling
- Commercial bin recycling
- Construction and demolition waste recycling
- Bulk-item materials collection
- Recycling at multiple-family housing complexes

(Implementation Program COS-7.2)

GHG-7 Educate the public regarding the various recycling programs that the City offers, and the benefits of recycling and waste reduction, including tips on how to recycle. (Implementation Program COS-7.3)

GHG-8 Coordinate development review of a proposed project with the applicable water districts to ensure that adequate water supplies are available to support new development and redevelopment. (Implementation Program COS-5.1)

GHG-9 The City will work with applicable water districts and the San Diego County Water Authority to examine strategies to address the City's water supply needs in compliance with the Urban Water Management Plan. (Implementation Program COS-5.2)

GHG-10 Work with water purveyors to expand opportunities for the use of recycled water for activities such as outdoor irrigation, toilet flushing, fire hydrants, commercial and industrial processes, carwashes, concrete batching, laundromats, dust control, parks, golf courses, other landscaped areas, and other appropriate water-intensive uses. (Implementation Program COS 5.3)

GHG-11 Develop a Climate Action Plan for reducing greenhouse gas emissions to meet state requirements. Components of the plan should include:

- Quantify greenhouse gas emissions, both existing and projected, over a specified time period;
- Establish a level below which the contributions to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify strategies and measures to be implemented at the project level that would collectively achieve the specified emissions level;
- Establish a program for monitoring and reporting results.

(Implementation Program COS-4.2)

## 4.9 HAZARDS AND HAZARDOUS MATERIALS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X		
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X		
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X		
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X		
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X		

### General Plan FEIR Conclusions

- Policies of the project address planned timing of structural development aligned with services/infrastructure development to properly serve the entire population. Thus, new development or redevelopment is not expected to impair implementation of, or physically interfere with, adopted emergency plans such as the City of San Marcos Emergency Operations Plan or Wildland Urban Interface Community Wildfire Protection Plan.

Enforcement of state, county, and local hazardous materials regulations will reduce potential impacts associated with hazards to a level less than significant. However, potential impacts from wildfires in Southern California remain a concern as population growth and development is in limited peripheral areas designated “extreme” community hazard fire zones. These impacts are considered significant but mitigable.

- Policies of the project update would not impact the development or function of the McClellan Airport in any manner. The City of San Marcos is currently in conformance with ALUCP height and land use policies, and the proposed program level modifications would not impact compliance. This impact is considered less than significant.

## **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City’s RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts due to hazards or hazardous materials. Further, General Plan FEIR Mitigation Measures HM-1, HM-2, HM-3, and HM-4 impose restrictions, require review and enforcement of requirements, and provide necessary response teams related to hazardous materials to reduce potential impacts. General Plan FEIR Mitigation Measures HM-5 and HM-6 aim to prevent interference with an adopted emergency plan or emergency evacuation plan by continuing to secure funding for and updating the Emergency Operations Center plan and developing a traffic light management plan for emergency events. General Plan FEIR Mitigation Measures HM-7 and HM-8 requires developments within or adjacent to “High,” “Very High,” or “Extreme” community hazard areas to be studied and to maintain and employ a fuel reduction/management plan.

The revisions to the Housing Element would not result in new hazards and hazardous materials impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to hazards and hazardous materials as a result of the proposed Project.

### **General Plan FEIR Mitigation Measures:**

HM-1 Restrict hazardous materials transportation to designated truck routes and time periods. (Implementation Program S-4.1)

HM-2 Maintain the existing arrangement with the County of San Diego Department of Environmental Health (DEH) Hazardous Materials Division (HMD) and local response teams for hazardous material spill response. (Implementation Program S-4.2)

HM-3 Continue to require and enforce CEQA review and Department of Education siting requirements for schools, parks and other applicable children-related land uses. (Implementation Program S-4.4)

HM-4 Require Cortese List status submittal and review by DEH HMD or appropriate local agency for known or suspected contamination sites prior to issuance of building permits. (Implementation Program S-4.3)

HM-5 Continue to secure funding for and update Emergency Operations Center plan. (Implementation Program S-5.3)

HM-6 Develop traffic light management plan for emergency events and coordinate such plan with NCTD for all significant Sprinter intersections. (Implementation Program S-5.4)

HM-7 Require all new development or existing structures in "High," "Very High," or "Extreme" community hazard areas maintain and employ a fuel reduction/management plan. (Implementation Program S-3.2)

HM-8 Provide fire studies for development within or adjacent to "High," "Very High," or "Extreme" community hazard areas (Implementation Program S-3.3)

## 4.10 HYDROLOGY AND WATER QUALITY

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				X		
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X		
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> <li>result in substantial erosion or siltation on- or off-site;</li> <li>substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</li> <li>create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</li> <li>impede or redirect flood flows?</li> </ul>				X		
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X		
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X		

## General Plan FEIR Conclusions

- Development that could result from implementation of the General Plan would not result in conversion existing groundwater recharge areas to urban uses. This is considered a less than significant impact.
- Implementation of the General Plan will not involve the direct alteration of existing streams, rivers or other drainage patterns. However, future development/redevelopment consistent with the General Plan could impact the existing drainage system. This is considered significant but mitigable.
- New development would increase the amount of landscaped areas, impervious surfaces, and runoff into the storm drain system, creeks, and water bodies in each of the watersheds in the City. New development in previously undeveloped areas can create the potential for greater amounts of pollutants and an increased potential for hydromodification effects in each creek system within each watershed.
- According to the San Diego Multi-Jurisdictional Hazard Mitigation Plan, the San Marcos dam has a “significant” potential for hazards related to dam failure while Dixon Dam has a “high” potential for hazards related to dam failure. However, implementation of the goals and policies of the General Plan would restrict the location of new development to areas that are not in major flood risk areas and by providing well-maintained regional flood control facilities to control flows. This is considered a less than significant impact.
- Impacts related to altering existing drainage patterns; flood hazard areas and risks; and inundation by seiche, tsunami, or mudflow are less than significant based on existing conditions and regulatory setting.

## Analysis of Modified Project

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City’s RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with hydrology and drainage, including preparation of site-specific analysis and required compliance with the San Marcos Municipal Code. The San Marcos General Plan includes policies and programs to reduce potential impacts to hydrology and water quality. Additionally, General Plan FEIR Mitigation Measures HWQ-1 through HWQ-12 outline strategies to increase water supply, decrease pollutants, and increase groundwater quality to reduce potential impacts.

The revisions to the Housing Element would not result in new hydrology and water quality impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to hydrology and water as a result of the proposed Project.



General Plan FEIR Mitigation Measures:

HWQ-1 The City will work with applicable water purveyors and the San Diego County Water Authority to examine strategies to address the City's water supply needs in compliance with the Urban Water Management Plan. (Implementation Program COS-5.2)

HWQ-2 The City will work with water purveyors to expand opportunities for the use of recycled water for activities such as outdoor irrigation, toilet flushing, fire hydrants, commercial and industrial processes, carwashes, concrete batching, laundry mats, dust control, parks, golf courses, other landscaped areas, and other appropriate water-intensive uses. Recycled water would meet all regulatory requirements from DHS and building codes. (Implementation Program COS-5.3)

HWQ-3 New development and redevelopment shall incorporate drought tolerant landscaping in parks and open spaces, within new rights-of-way, in yards, and other appropriate places. (Implementation Program COS-5.4)

HWQ-4 The City will require the implementation of water conservation efforts for households, businesses, industries and public infrastructure. Include the following measures:

- a. Require low-flow appliances and fixtures in all new development;
- b. Work with water providers and water conservation agencies to create an incentives program that encourages retrofitting existing development with low-flow water fixtures;
- c. Require new development and landscaped public areas to utilize state-of-the-art irrigation systems that reduce water consumption including graywater systems, where feasible, and rainwater catchment
- d. Encourage use of drought-tolerant and native vegetation.
- e. Require development project approvals to include a finding that feasible and cost-effective options for conservation and water reuse are incorporated into project design including graywater systems. Implementation of graywater systems are required to meet all DHS, building, plumbing, and SDRWQCB requirements to avoid water quality impacts.
- f. If recycled water is unavailable, evaluate and if feasible, utilize deep water wells rather than potable water for irrigation and other non-drinking purposes.
- g. Educate the public regarding the various water conservation programs that the City serving water districts provide offers, and the benefits of water conservation, including tips on how to reduce water usage.

(Implementation Program COS-5.5)

HWQ-5 The City shall coordinate with regulatory agencies and other parties to ensure that pollutant sources in sub watersheds to surface water and groundwater are re-assigned to the appropriate regulatory process (air, waste, water). (Implementation Program COS-6.1)

HWQ-6 The City, in conjunction with other agencies, shall develop a watershed implementation and improvement plan for each subwatershed to address achievement of sustainable surface water quality and beneficial uses through identification of water use, supply treatment, and transportation opportunities, and provide programs and measures designed to promote, maintain, or achieve compliance with water quality laws, regulations, and standards including statewide

plans, regional plans, TMDLs and NPDES permits for future municipal stormwater permits. (Implementation Program COS-6.2)

HWQ-7 The City shall establish sources, constituents, and water body priorities based on surface water quality and groundwater quality for each watershed within the City of San Marcos. (Implementation Program COS-6.3)

HWQ-8 The City shall identify pollutants of concern in each subwatershed for groundwater and surface water. (Implementation Program COS-6.4)

HWQ-9 The City shall develop a groundwater management plan for each subwatershed groundwater basin to address achievement of sustainable groundwater quality and sustainable beneficial uses. (Implementation Program COS-6.5)

HWQ-10 The City shall involve the public in understanding and defining sustainable watershed protection for surface and groundwater quality management by:

- a. Developing publicly supported criteria for sustainable watershed protection based on social, economic and environmental costs and benefits; and
- b. Applying publicly supported criteria for watershed protection to surface and groundwater quality management decisions.

(Implementation Program COS-6.6)

HWQ-11 The City shall assess hydromodification effects at the sub-watershed level. (Implementation Program COS-6.7)

HWQ-12 The City shall establish at the sub-watershed level hydromodification management plans for high priority drainages. (Implementation Program COS-6.8)

## 4.11 LAND USE AND PLANNING

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
<b>Would the project:</b>						
a. Physically divide an established community?				X		
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X		

### **General Plan FEIR Conclusions**

- While new development and intensification of land uses within the planning area would occur, the different types of uses that would be allowed would not result in the physical division of an established community. Planned transportation and mobility improvements included within the General Plan would not introduce features that would divide an established community. This is considered a less than significant impact.
- Implementation of the San Marcos General Plan would result in conflicts with the existing Zoning Ordinance. This is considered significant but mitigable.

### **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with land use policies and programs. The San Marcos General Plan includes policies and programs to reduce potential impacts resulting from new development and intensification of land uses.

The revisions to the Housing Element would not result in new land use and planning impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to land use and planning as a result of the proposed Project.

#### General Plan FEIR Mitigation Measures:

LU-1 Upon adoption of the General Plan, the City shall amend/update the City's existing Zoning Ordinance to be consistent with the General plan. This update shall occur within 12 months of General Plan adoption. (Implementation Program LU-1.1)

## 4.12 MINERAL RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X		
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X		

### General Plan FEIR Conclusions

This topic is addressed within Section 3.6, Geology, Soils, and Mineral Resources in the General Plan FEIR.

- The planning area is primarily not located within an area specifically identified by the California Department of Mines and Geology as having substantial mineral resources but does contain a limited area of MRZ-2 class lands, which denote known mineral resources, and 6 mines or quarries operate in the planning area. As the planning area has no operating mine/quarry operations, implementation of the General Plan would not impact the land planning or function mine and quarry operations. Land use changes that would affect the current or future operation of these areas, site-specific or adjacent to, is not proposed. Further, policies of the Conservation and Open Space Element ensure compliance with CEQA and state law for the protection of mineral resources. The General Plan contains policies and programs to ensure compliance with CEQA and state law for the protection of significant aggregate resources, should any be discovered within the planning area. This is considered a less than significant impact.

### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to mineral resources as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in new mineral resources impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to mineral resources as a result of the proposed Project.

#### 4.13 NOISE

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project result in:						
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X		
b. Generation of excessive groundborne vibration or groundborne noise levels?				X		
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X		

#### General Plan FEIR Conclusions

- Development and intensification of land uses within the planning area due to implementation of the San Marcos General Plan would result in significant impacts related to noise. This is considered significant but mitigable.
- Implementation of the General Plan would not expose new or existing noise sensitive land uses to elevated aircraft noise levels. This is considered a less than significant impact.

#### Analysis of Modified Project

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be

reviewed for consistency with policies and programs aimed to reduce potential impacts associated with noise, including preparation of site-specific analysis and required compliance with the San Marcos Municipal Code. The San Marcos General Plan includes policies and programs to reduce potential impacts to ambient noise levels as a result of groundborne vibration or exposure to excessive noise levels. Further, General Plan FEIR Mitigation Measures N-1, N-2, N-3, and N-4 ensure review and enforcement of noise standards on new and existing development, development of noise impact guidelines, and require construction activities to reduce potential impacts related to noise.

The revisions to the Housing Element would not result in noise impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to noise as a result of the proposed Project.

General Plan FEIR Mitigation Measures:

N-1 Review development proposals to ensure that the noise standards and compatibility criteria set forth in the Noise Element are met. Consult Noise Element guidelines and standards for noise compatible land uses to determine the suitability of proposed developments relative to existing and forecasted noise levels. Enforce the California Noise Insulation Standards to ensure an acceptable interior noise level of 45 dBA Ldn in habitable rooms.

N-2 Enforce the City's Noise Ordinance limits for noise producing land uses to limit the effect of noise on adjacent properties. Update the Noise Ordinance to incorporate new noise standards consistent with the Noise Element and to ensure effectiveness in controlling noise sources. Revise the Noise Ordinance to achieve the following:

- Provide hourly and maximum property line noise level limits for all major zoning districts defined in the Zoning Ordinance;
- Limit the hours of deliveries to commercial, mixed use, and industrial uses adjacent to residential and other noise sensitive land uses;
- Limit the hours of operation for commercial and retail to limit noise intrusion into nearby residential and other noise sensitive land uses;
- Limit noise levels generated by commercial and industrial uses;
- Limit outdoor industrial activities or operations to control excessive noise at adjacent residential properties;
- Limit the hours of operation of high noise-generating industrial equipment;
- Limit the hours of operation for refuse vehicles and parking lot sweepers if their activity results in an excessive noise level that adversely affects adjacent residential uses;
- Require the placement of loading and unloading areas so that commercial buildings shield nearby residential land uses from noise generated by loading dock and delivery activities. If necessary, additional sound barriers shall be constructed on the commercial sites to protect nearby noise sensitive uses;
- Require the placement of all commercial HVAC machinery to be placed within mechanical equipment rooms wherever possible. (Equipment manufacturer's specifications for venting and access to outside air shall be maintained); and

- Require the provision of localized noise barriers or rooftop parapets around HVAC, cooling towers, and mechanical equipment so that line-of-sight to the noise source from the property line of the noise sensitive receptors is blocked. (Equipment manufacturer's specifications for venting and access to outside air shall be maintained).

N-3 Develop noise impact analysis guidelines that describe the City's desired procedure and format for acoustical studies. Acoustical studies will be required for all discretionary projects where any of the following apply:

- The project includes a noise-sensitive land use that is located within the existing or future 65 dBA CNEL contour for transportation noise sources.
- The project will cause future traffic volumes to increase by 25 percent or more on any roadway that fronts residential, institutional, or open space land uses.
- The project will expose a noise-sensitive land use to a stationary noise source exceeding the standards outlined in the Noise Element. Such stationary sources may include mechanical equipment operations, entertainment venues, industrial facilities, and property maintenance.
- The project includes a noise-sensitive land use in the vicinity of existing or proposed commercial and industrial areas.
- The project is a mixed-use development that includes a residential component. The focus of this type of acoustical study is to determine likely interior and exterior noise levels and to recommend appropriate design features to reduce noise.
  - Recommend appropriate mitigation to achieve compliance with the adopted policies and standards of the Noise Element. Where the noise source in question consists of intermittent single events, the report must address the effects of maximum noise levels in sleeping rooms in terms of possible sleep disturbance. An acoustical analysis prepared in accordance with the Noise Element shall:
    - be the financial responsibility of the applicant seeking City approval of a project;
    - be prepared by a qualified person experienced in the fields of environmental noise assessment and architectural acoustics;
    - include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and predominant noise sources;
    - estimate existing and projected cumulative (20 years) noise in terms of CNEL or Ldn, and compare those noise levels to the adopted standards and policies of the Noise Element;
    - recommend appropriate mitigation to achieve compliance with the adopted policies and standards of the Noise Element. Where the noise source in question consists of intermittent single events, the report must address the effects of maximum noise levels inside sleeping rooms with windows open in terms of possible sleep disturbance;
    - estimate noise exposure after the prescribed mitigation measures have been implemented; and
    - describe a post-project assessment program that could be used to evaluate the effectiveness of the proposed mitigation measures.

*Groundborne Vibration and Noise*

See Mitigation Measure N-1 through N-3 above.

N-4 The City shall require construction contractors to implement the following measures during construction activities through contract provisions and/or conditions of approval as appropriate:

- Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- Construction operations and related activities associated with the project shall comply with the operational hours outlined in the City of San Marcos Noise Ordinance.
- Construction equipment shall not be idled for extended periods of time in the vicinity of noise sensitive receptors.
- Locate fixed and/or stationary construction equipment as far as possible from noise sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers).
- Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment.
- Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated Sound Transmission Class (STC) rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be determined by analysis.



## 4.14 POPULATION AND HOUSING

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X		
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X		

### General Plan FEIR Conclusions

- Although the General Plan would accommodate population and employment growth within the planning area, this in and of itself, is not an environmental impact. This is considered a less than significant impact.
- Land use changes allowed by the General Plan may impact existing residential development, but substantial changes are primarily expected to include activities that would maintain or increase the existing housing stock with limited displacement or destruction of existing homes. This is considered a less than significant impact.

### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the San Marcos General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with substantial unplanned population growth and displacement.

The revisions to the Housing Element would not result in housing and population impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to population and housing as a result of the proposed Project.

## 4.15 PUBLIC SERVICES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
<p>a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <ul style="list-style-type: none"> <li>• Fire protection?</li> <li>• Police protection?</li> <li>• Schools?</li> <li>• Parks?</li> <li>• Other public facilities?</li> </ul>						
				X		

### General Plan FEIR Conclusions

- Future population growth associated with development would require an increase of public services demand for police protection, fire protection, schools, libraries, and recreation and open space. Local and regional service providers must continue to evaluate the levels of service desired and the funding sources available to meet increases in demand. Potential impacts are addressed by various City policies included in the General Plan, as well as site-specific mitigation measures identified once a project site and proposal are known. This is considered a less than significant impact.

### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. The San Marcos General Plan includes policies and programs to reduce potential impacts to public services as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in public services impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR

mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to public services as a result of the proposed Project.

#### 4.16 RECREATION

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X		
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X		

#### General Plan FEIR Conclusions

- The increased population resulting from implementation of the General Plan will create a demand for additional park improvements to increase the availability of recreational opportunities within the San Marcos planning area. This population increase would require expansion of existing facilities and/or construction of new park and recreation facilities. The City of San Marcos requires the provision of parks and/or open space park land for residential and non-residential development projects. In lieu of providing acreage, the City can assess project fees for community park land as stipulated by the Quimby Act. These fees will be used to acquire community park land as sufficient funding and land become available, and/or to expand and maintain existing recreational facilities. Implementation of the General Plan would contribute additional funding to the City of San Marcos as new development occurs and fees resulting from the Quimby Act are paid. This is considered a less than significant impact.

#### Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to

reduce potential impacts to parks and recreation facilities as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in parks and recreation facilities impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to recreation as a result of the proposed Project.

## 4.17 TRANSPORTATION

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X		
b. <i>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</i>				X		
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X		
d. Result in inadequate emergency access?				X		

### General Plan FEIR Conclusions

- Implementation of the General Plan would result in general intensification of the planning area. Development or intensification activities is expected to result in increases to the resident population, number of employees, and number of visitors to the planning area, resulting in increases in traffic volumes. This is considered a significant but mitigable impact.
- Implementation of the General Plan would not cause impacts related to air traffic patterns, and impacts would be less than significant for design hazards, emergency access, public transit, bicycle, and pedestrian facilities.

## Analysis of Modified Project

The General Plan FEIR did not address potential impacts to vehicle miles traveled (VMT) because at the time of preparation of the General Plan FEIR, VMT was not the primary metric used as the basis for determining the significance of transportation impacts under CEQA. However, the proposed Project does not include site-specific development or result in any changes to existing land uses or allow for greater development than what was considered in the General Plan FEIR. Thus, the proposed Project would result in the same VMT as would occur under the existing General Plan and would not result in new impacts or substantially more significant impacts related to VMT.

It should be noted that although Level of Service (LOS) no longer serves as the basis for determining the significance of transportation impacts under CEQA, the General Plan FEIR included mitigation to address potentially significant impacts to the LOS of various intersections and to support multi-modal travel to reduce potential impacts to the City's transportation system. These Mitigation Measures are identified below.

As noted above, the Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to the circulation system, including increased hazards and emergency access, as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in transportation impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to transportation as a result of the proposed Project.

### General Plan FEIR Mitigation Measures:

TT-1 Consider the following improvements to intersections that have not been identified as protected intersections:

- Rancho Santa Fe Road/Melrose Drive – Add a westbound right turn lane. With this improvement, the intersection would operate at LOS D, an acceptable level.
- Rancho Santa Fe Road/San Elijo Road – Consider a northbound right-turn overlap phase (note – this would prohibit westbound U-turns at the intersection). With the improvement, the intersection would operate at LOS D, an acceptable level.
- Buena Creek Road/Twin Oaks Valley Road – Add a second eastbound left turn lane and an eastbound overlap right-turn phase (note – this would prohibit northbound U-turns at the intersection). With this modification, the intersection would operate at LOS D.
- Borden Road/Twin Oaks Valley Road – Add a second eastbound left-turn lane, add a southbound overlap right-turn phase (note – this would prohibit eastbound U-turns at the intersection), and provide for protected left-turn phasing for the northbound and southbound approaches. With this modification, the intersection would operate at LOS C.

TT-2 Support alternative modes of travel by continuously developing and supporting these modes of travel. This can continually occur by:

- Continued implementation and update of the Bicycle Master Plan and integrating it with a Pedestrian Master Plan;
  - Update and maintain City Roadway Standards to consider the public realm of the street and implement complete streets, as appropriate;
  - Consider development of a neighborhood electric vehicle (NEV) master plan to encourage use of no emission vehicles on appropriate facilities. Coordinate with SANDAG and the State Legislature to allow NEVs on public roadways with greater than 35 miles per hour posted speed limit;
  - Develop innovative funding mechanisms (such as fee districts or Transnet funding) to assist in implementing, operating, and maintaining the proposed shuttle system and bike share facilities within the City;
  - Work with developers to integrate bicycle and pedestrian amenities within their development plans.
- (Implementation Program M-3.1)

#### 4.18 TRIBAL CULTURAL RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X		
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X		

## **General Plan FEIR Conclusions**

Since certification of the General Plan FEIR, the CEQA Guidelines Appendix G Checklist has been revised to include a new category for Tribal Cultural Resources impacts. This topical area is addressed in the General Plan FEIR's Cultural Resources section.

## **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs and the General Plan FEIR includes Mitigation Measures CR-1, CR-3, CR-4, and CR-6 to reduce potential impacts related to tribal cultural resources. The Housing Element policies and programs would not have an impact on existing General Plan policies protecting tribal cultural resources.

The revisions to the Housing Element would not result in new tribal cultural resource impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts to tribal cultural resources as a result of the proposed Project.

## 4.19 UTILITIES AND SERVICE SYSTEMS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X		
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X		
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X		
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X		
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X		

### General Plan FEIR Conclusions

- Implementation of the San Marcos General Plan would result in significant impacts related to water infrastructure, water supply, and wastewater capacity. This is considered significant but mitigable.
- Future land uses consistent with the proposed General Plan would result in increased solid waste generation, increased stormwater volumes, and increased energy consumption; however, the General Plan includes numerous policies and programs to reduce solid waste generation, stormwater volumes, and energy consumption. This is considered a less than significant impact.



## Analysis of Modified Project

The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts to utilities and service systems as a result of new development and intensification of land uses. Additionally, General Plan FEIR Mitigation Measure PSU-1 ensures adequate funding for infrastructure improvements; General Plan FEIR Mitigation Measure PSU-2 considers services that reduce water demand; General Plan FEIR Mitigation Measure PSU-3 reviews development and redevelopment proposals to ensure adequate water and wastewater service, and; General Plan FEIR Mitigation Measures PSU-4, PSU-5, and PSU-6 require new developments to demonstrate adequate utility capacity, provide necessary facilities, install sufficient sewer facilities, and pay a share of wastewater infrastructure improvements to reduce potential impacts related to utilities and service systems. The Housing Element policies and programs would not have an impact on existing General Plan policies addressing utilities and service systems

The revisions to the Housing Element would not result in new utilities and service systems impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to utilities and service systems as a result of the proposed Project.

### General Plan FEIR Mitigation Measures:

PSU-1 Update existing fee programs, and revise as needed, to ensure adequate funding is available to provide infrastructure improvements and community facilities for new development. Amend appropriate codes to require new projects to pay for the infrastructure and services they necessitate, including through private financing or grants. Affordable housing developments that meet specified criteria may warrant full or partial fee reductions. (Implementation Program LU-7.2)

PSU-2 Consider water-based services that reduce demand and draw on alternative supplies to be equivalent to new supplies. Water-based services include the application of state-of-the-art technology and practices; matching water quality to its end use; and financing local wastewater reuse in the same manner in which centralized water supply options are financed. (Implementation Program LU-8.6)

#### Water Supply

See PSU-2 above.

PSU-3 Review development and redevelopment proposals and require necessary studies, as appropriate, water conservation, and mitigation measures to ensure adequate water and wastewater service. (Implementation Program LU-8.5)

## Wastewater Capacity

See PSU-3 above.

PSU-4 The City shall require new development to demonstrate adequate utility capacity and provide necessary facilities prior to approval.

PSU-5 The City shall require new development to install sufficient sewer facilities to meet wastewater collection agency performance standards.

PSU-6 The City shall require new development to pay its fair share for wastewater infrastructure improvements.

## 4.20 WILDFIRE

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				X		
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X		
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X		
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X		

## General Plan FEIR Conclusions

Since certification of the General Plan FEIR, the CEQA Guidelines Appendix G Checklist has been revised to include a new category for Wildfire impacts. The topic of wildfire hazards is addressed in the General Plan FEIR's Hazardous and Hazardous Materials section.

- Potential impacts from wildfires in Southern California remain a concern as population growth and development is in limited peripheral areas designated “extreme” community hazard fire zones. These impacts are considered significant but mitigable.

### **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the planning area. However, potential development of vacant and underutilized sites to accommodate the City’s RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The San Marcos General Plan includes policies and programs to reduce potential impacts due to wildfires. Additionally, General Plan FEIR Mitigation Measures HM-5 and HM-6 aim to prevent interference with an adopted emergency plan or emergency evacuation plan by continuing to secure funding for and updating the Emergency Operations Center plan and developing a traffic light management plan for emergency events.

The revisions to the Housing Element would not result in new wildfire impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan Policies, there would be no new significant or significantly different impacts related to wildfire as a result of the proposed Project.

#### General Plan FEIR Mitigation Measures:

See Mitigation Measure HM-7 above.

See Mitigation Measure See HM-8 above.

## 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X		
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				X		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X		

### General Plan FEIR Conclusions

As described above, the General Plan FEIR concluded that full implementation of the General Plan would result in less than significant impacts or less than significant impacts with the implementation of mitigation measures for all issue areas analyzed except for 3.3 Air Quality (Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation) and 3.7 Greenhouse Gas Emissions (Generation of GHG Emissions), which were determined to be significant and unavoidable. The General Plan FEIR’s background and policy information and environmental impact conclusions are cited throughout this Addendum.

### Analysis of Modified Project

Future housing could significantly impact, directly or through habitat modifications, sensitive vegetation communities and/or sensitive plant and wildlife species; refer to Section 4.4 above. Additionally, ground-disturbing activities associated with future development, such as grading or excavation, could unearth undocumented archeological or disturb unknown human remains; refer

to Section 4.5 above. Individual project proposals would be subject to review under CEQA, and site-specific biological and cultural surveys would be conducted, as needed, to evaluate potential impacts to such resources. Following compliance with the established regulatory framework, recommended FEIR mitigation measures, and General Plan Policies, no new significant impact to biological or cultural resources or substantial increase in the severity of previously identified significant impacts would occur with implementation of the Project.

The General Plan FEIR determined that cumulative impacts would result in the following areas: violation of air quality standard or contribution to air quality violation, generation of GHG emissions, water supply, energy infrastructure. All other cumulative impacts were determined to be less than significant.

The anticipated housing development would not result in environmental effects that would cause substantial adverse effects on human beings.