Mission 316 Specific Plan

Final Initial Study/Mitigated Negative Declaration

ND 14-007

City of San Marcos

October 2014

TABLE OF CONTENTS

List of Tables

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1.0 INTRODUCTION AND SUMMARY

This Final Initial Study and Mitigated Negative Declaration (IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 *et seq*.) and the *CEQA Guidelines* (California Administrative Code Section 15000 *et seq*.).

CEQA Guidelines Section 15074(b) and (d) state:

> "(b) Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis."
>
> "(d) When adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects."

In accordance with this requirement, the Mission 316 Specific Plan Project IS/MND is comprised of the following:

- Draft Initial Study and Mitigated Negative Declaration September 2014;
- This Final IS/MND document, October 2014, that incorporates the information required by §15074 (included in this document); and
- A Mitigation Monitoring and Reporting Program (included in this document).

Format of the Final IS/MND

This document is organized as follows:

Section 1.0 Introduction and Summary

This section describes CEQA requirements and content of this Final IS/MND.

Section 2.0 Corrections and Additions

This section provides a list of those revisions made to the Draft IS/MND text as a result of comments received and/or errors and omissions discovered subsequent to release of the Draft IS/MND for public review.

Section 3.0 Responses to Comment Letters Received on the Draft IS/MND

This section provides copies of the comment letters received and individual responses to written comments.

Section 4.0 Mitigation Monitoring and Reporting Program

This section provides a program of monitoring or reporting to ensure that the provisions or revisions are complied with during implementation of the project.

2.0 CORRECTIONS AND ADDITIONS

This section contains revisions to information included in the Draft IS/MND (September 2014) based upon additional or revised information required to prepare a response to a specific comment. Please see copies of the letters and responses in Section 3.0, Responses and Comments of this Final IS/MND, as applicable.

2.1 REFINEMENTS TO MITIGATION MEASURES

Based upon comments from the Wildlife Agencies, the following mitigation measure were refined. Changes are shown in a strike out/underline format.

~~**MM-BIO-1** Permanent impacts to 3.61 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.61 acres of Tier II habitat shall be preserved through on-site preservation, a purchase of credits from an approved mitigation bank, or a combination thereof as approved by the Planning Director.~~

MM-BIO-1 Permanent impacts to 3.81 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.81 acres of Tier II habitat shall be mitigated through either preservation in the City of San Marcos, a purchase of credits from an approved mitigation bank, or a combination thereof, as approved by the Planning Director.

2.2 REVISED AND SUPPLEMENTAL TEXT

The following table summarizes the changes to the Draft IS/MND. These changes were based upon comments received during public review as well as additional clean up items due to project refinements.

Pages	IS/MND Section	Summary of Change
5 and 8	II.A – Project Description	Acreage of proposed boundary adjustment updated.
34	IV.a – Biological Resources	Reference to ruderal vegetation removed. Table 6 deleted and new Tables 6a and 6b added .
35 (Figure 7)	IV.a – Biological Resources	Figure 7 revised to remove reference to ruderal vegetation.
36	IV.a – Biological Resources	Tables 6a and 6b added to document. Mitigation measures BIO-1 updated to reflect revised amount of mitigation requirement for DCSS impacts and to also clarify where the mitigation may take place.
105	VIII. Findings	Mitigation measures BIO-1 updated to reflect revised amount of mitigation requirement for DCSS impacts and to also clarify where the mitigation may take place.

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3.0 RESPONSE TO WRITTEN COMMENTS

Section 3.0 contains responses to all comment letters received on the September 2014 Draft IS/MND. A total of six comment letters were received during the comment period, which closed October 15, 2014 (Table 3-1).

Table 3-1. Comment Letters – Mission 316 Specific Plan

Number	Letter Preparer	Date
1A	Governor's Office of Planning and Research – State Clearinghouse and Planning Unit (1 of 2)	10-15-14
1B	Governor's Office of Planning and Research – State Clearinghouse and Planning Unit (2 of 2)	10-16-14
2	United States Fish and Wildlife Service/California Department of Fish and Game	10-15-14
3	California Public Utilities Commission	10-15-14
4	Pechanga Cultural Resources	10-15-14
5	Rincon Band of Luiseño Indians	10-8-14

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STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

RECEIVED
OCT 17 2014
CITY OF SAN MARCOS
PLANNING DIVISION

October 15, 2014

Garth Koller
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069-2918

Subject: Mission 316 Specific Plan
SCH#: 2014091041

Dear Garth Koller:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on October 14, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

1A-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH#	**2014091041**
Project Title	Mission 316 Specific Plan
Lead Agency	San Marcos, City of
Type	**MND** Mitigated Negative Declaration
Description	The Davia Village Specific Plan proposes 95 attached residential units. Discretionary actions for the project include a General Plan Amendment, Rezone, Approval of Specific Plan and Tentative Map.

Lead Agency Contact

Name	Garth Koller		
Agency	City of San Marcos		
Phone	(760) 744-1050 x3231	***Fax***	
email			
Address	1 Civic Center Drive		
City	San Marcos	***State*** CA	***Zip*** 92069-2918

Project Location

County	San Diego		
City	San Marcos		
Region			
Lat / Long	33° 8' 32.5" N / 117° 9' 27.5" W		
Cross Streets	Mission Drive/Falcon Place		
Parcel No.	220-210-10, -41, -46		
Township	***Range***	***Section***	***Base***

Proximity to:

Highways	SR-78
Airports	
Railways	BNSF
Waterways	San Marcos Creek
Schools	
Land Use	Heart of the City Specific Plan

Project Issues Archaeologic-Historic; Biological Resources; Noise; Traffic/Circulation; Vegetation

Reviewing Agencies Resources Agency; Department of Conservation; California Coastal Commission; Caltrans, District 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 11; Air Resources Board; Native American Heritage Commission; Public Utilities Commission

Date Received 09/15/2014 ***Start of Review*** 09/15/2014 ***End of Review*** 10/14/2014

Letter 1A
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1 of 2

1A-1 This letter from Governor's Office of Planning and Research states that the City complied with the State Clearinghouse review requirements for draft environmental document pursuant to the California Environmental Quality Act. This letter does not raise any environmental issues.

As a point of clarification, on the attachment to the letter, there is an incorrect reference to Davia Village project in the project description. This was a typographical error. The correct project, name, as referenced in the subject line of OPR's letter is Mission 316 Specific Plan.

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

October 16, 2014

RECEIVED
OCT 20 2014
CITY OF SAN MARCOS
PLANNING DIVISION

Garth Koller
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069-2918

Subject: Mission 316 Specific Plan
SCH#: 2014091041

Dear Garth Koller:

The enclosed comment (s) on your Mitigated Negative Declaration was (were) received by the State Clearinghouse after the end of the state review period, which closed on October 14, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2014091041) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1B-1

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624

California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-SDG-15B0008-15CPA0004

OCT 15 2014

Mr. Garth Koller, Principal Planner
City of San Marcos
1 Civic Center Drive
San Marcos, California 92069

Subject: Comments on the Draft Mitigated Negative Declaration for the Mission 316 Specific Plan (P14-0001: GPA 14-001, R 14-001, SP 14-001, MFSDP 14-001, TSM 14-001, CUP 14-016, ND 14-007; SCH #2014091041), City of San Marcos, San Diego County, California

Dear Mr. Koller:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced draft Mitigated Negative Declaration (MND) for the Mission 316 Specific Plan (Project), in the City of San Marcos (City), dated September 15, 2014. The comments provided herein are based upon information provided in the draft MND (and associated reference materials), our knowledge of sensitive and declining vegetation communities, and our participation in the Multiple Habitat Conservation Program (MHCP) and the City's draft MHCP Subarea Plan (SAP).

1B-1 Cont.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA, Fish and Game Code §2050 *et. seq.*) and other sections of the Fish and Game Code. The Department is also responsible for the administration of the Lake and Stream Alteration Agreement program (Fish and Game Code §1600 *et seq.*). The Department also administers the Natural Community Conservation Planning (NCCP) program (NCCP, Fish and Game Code §2800 *et. seq.*). The City participates in the NCCP and the Service's HCP programs through the development of its draft SAP.

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) 2

The Project proposes an attached residential condominium project of 95 residential units, 213 parking spaces, 5.27 acres of common and landscaped open space, and associated roadways and other infrastructure. The Project site is bounded on the west and east by undeveloped land, on the north by existing residential and disturbed open space, and on the south by Mission Road; and is located outside of the Focused Planning Area (FPA), or preserve, in the City's draft SAP.

The Project site consists of three parcels (APN 220-210-10, -41, and -46) totaling approximately 9.27 acres. The western parcel of the Project site was previously maintained as a residence with an orchard and an existing San Diego Gas & Electric power line that traverses the southern portion of the parcel. As part of the Project, a boundary adjustment to APN 220-210-10 of 0.29 acre to the landowner north of the Project site will occur, bringing the total Project site to 8.98 acres. The boundary adjustment will include 0.09 acre of Diegan coastal sage scrub. However, the MND does not disclose what vegetation types make up the remainder of the boundary adjustment area.

The Project site (prior to the boundary adjustment) supports 3.8 acres of Diegan coastal sage scrub, 0.9 acre of ruderal vegetation, 4.27 acres of urban/developed, and 0.3 acre of disturbed open space. No coastal California gnatcatchers (*Polioptila californica californica*, gnatcatcher) were detected during protocol-level surveys conducted April to June 2014.

A 150-foot fuel management zone will be provided on three sides of the Project site. Fuel management will occur in three zones: Zone A, the first 50 feet around a structure; Zone B, generally 51 to 100 feet beyond structures; and Zone C, 101 to 150 feet beyond structures. While the draft MDN states that fuel modification within zones B and C will impact approximately 0.11 acre of Diegan coastal sage scrub, it does not disclose what other vegetation impacts will occur from fuel modification. Off-site portions of zones B and C overlap existing conservation easements on two parcels (APNs 220-480-01 and -06). Special clearing techniques will be used on these parcels including selective hand-clearing of the most highly flammable plants and retaining small patches of native vegetation. Fuel modification in the conservation easements will require approval from the Golden State Lands Conservancy and the appropriate resource agencies prior to any vegetation management activities.

According to the draft MND, the project will impact a total of 3.61 acres of Diegan coastal sage scrub, including 0.11 acre of fuel modification offsite. However, it is unclear how this impact total was arrived at and the draft MND did not include information on impacts to other vegetation types.

Permanent impacts to 3.61 acres of Diegan coastal sage scrub will be mitigated through on-site preservation, purchase of credits from an approved mitigation bank, or a combination thereof as approved by the Planning Director. The draft MND also states mitigation will not be required for impacts to 0.11 acre of Diegan coastal sage scrub that may otherwise be cleared per County of San Diego Code Section 4907.2.1 that allows up to 20 feet of vegetation clearing along Mission Road.

1B-1 Cont.

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) 3

The Wildlife Agencies offer the comments and recommendations in the enclosure to assist in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that it is consistent with, and does not adversely affect, the City's draft SAP and ongoing regional habitat conservation planning efforts. We appreciate the opportunity to comment on this draft MND and look forward to further coordination among the City and Wildlife Agencies to discuss and resolve the issues associated with the Project, including those raised in this letter. If you have questions regarding our comment on the Project, please contact Janet Stuckrath of the Service (760-431-9440 ext. 270, Janet_Stuckrath@fws.gov) or Eric Hollenbeck of the Department (858-467-2720, Eric.Hollenbeck@wildlife.ca.gov).

1B-1 Cont.

Sincerely,

, for

Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

cc:
State Clearinghouse (fax only)

Enclosure

ENCLOSURE

Wildlife Agency Comments/Recommendations
Mission 316 Specific Plan MND

1. The draft MND states that the proposed project site supports 0.9 acre of *ruderal* vegetation. The MHCP does not recognize *ruderal* as a vegetation community type (Appendix F, MHCP Vol. II, p. F-3). Areas that formerly would have been classified as ruderal now fall into one of the categories defined in Appendix F: annual (nonnative) grassland, disturbed land, or agricultural (including fallow) land. The final MND should change the ruderal vegetation type to the appropriate vegetation community type based on the definitions in Appendix F.

2. The final MND should require mitigation for impacts to annual (nonnative) grassland at a 0.5:1 ratio consistent with the MHCP.

3. According to the draft MND, approximately 0.1 acre of Diegan coastal sage scrub will not be impacted by the proposed project. This 0.1 acre is in three localized areas and will not continue to provide any value for wildlife. Therefore, the Wildlife Agencies would consider all the Diegan coastal sage scrub on the Project site to be impacted and recommend that mitigation be provided accordingly.

4. According to the draft MND, fuel modification zones B and C for the proposed project will overlap existing conservation easements on adjacent parcels. Please provide information regarding the origin of these easements (i.e., for what projects did they provide mitigation). Fuel modification is generally not allowed within mitigation areas or conservation easements. All fuel modification should be contained within the existing property boundaries. Therefore, we recommend that the proposed project be redesigned to remove all fuel modification from adjacent properties.

5. Any required fuel modification should be consistent with the *Memorandum of Understanding between the Fish and Wildlife Service of the United States Department of Interior, the California Department of Fish and Game, the California Department of Forestry, the San Diego County Fire Chief's Association and the Fire District's Association of San Diego County* (dated February 26, 1997).

6. The draft MND states that the mitigation requirement for impacts to Diegan coastal sage scrub will be met through on-site preservation, purchase of credits from an approved mitigation bank, or a combination thereof. Because the on-site areas are too small to provide values for wildlife and serve as useful mitigation, we recommend that all mitigation requirements (both Diegan coastal sage scrub and annual grassland) be met off site through the purchase of credits at a mitigation bank approved by the City and Wildlife Agencies.

7. The final MND should provide a table that shows impacts to all vegetation types from project construction and fuel modification, taking into account the proposed boundary line adjustment.

1B-1 Cont.

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) Enclosure, Page 2

8. We do not concur that mitigation should not be required for permanent impacts to areas that may be periodically cleared along Mission Road per County of San Diego Code Section 4907.2.1. Therefore, the final MND should require mitigation for impacts to these areas.

1B-1 Cont.

Letter 1B
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
2 of 2

1B-1 This letter from the Governor's Office of Planning and Research transmit the comment letter from the United States Fish and Wildlife Service/California Department of Fish and Wildlife (USFWS/CDFG). The City received a separate copy of the letter directly from the Wildlife Agencies and it is included as Letter 2. Responses to the USFWS/CDFG letter are provided in responses 2-1 through 2-13.

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624

California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-SDG-15B0008-15CPA0004

OCT 15 2014

Mr. Garth Koller, Principal Planner
City of San Marcos
1 Civic Center Drive
San Marcos, California 92069

Subject: Comments on the Draft Mitigated Negative Declaration for the Mission 316 Specific Plan (P14-0001: GPA 14-001, R 14-001, SP 14-001, MFSDP 14-001, TSM 14-001, CUP 14-016, ND 14-007; SCH #2014091041), City of San Marcos, San Diego County, California

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2-1

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) 2

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2-2

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2-3

According to the draft MND, the project will impact a total of 3.61 acres of Diegan coastal sage scrub, including 0.11 acre of fuel modification offsite. However, it is unclear how this impact total was arrived at and the draft MND did not include information on impacts to other vegetation types.

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2-4

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) 3

The Wildlife Agencies offer the comments and recommendations in the enclosure to assist in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that it is consistent with, and does not adversely affect, the City's draft SAP and ongoing regional habitat conservation planning efforts. We appreciate the opportunity to comment on this draft MND and look forward to further coordination among the City and Wildlife Agencies to discuss and resolve the issues associated with the Project, including those raised in this letter. If you have questions regarding our comment on the Project, please contact Janet Stuckrath of the Service (760-431-9440 ext. 270, Janet_Stuckrath@fws.gov) or Eric Hollenbeck of the Department (858-467-2720, Eric.Hollenbeck@wildlife.ca.gov). 2-5

Sincerely,

, for

Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

cc:
State Clearinghouse (fax only)

Enclosure

ENCLOSURE

Wildlife Agency Comments/Recommendations
Mission 316 Specific Plan MND

1. The draft MND states that the proposed project site supports 0.9 acre of *ruderal* vegetation. The MHCP does not recognize *ruderal* as a vegetation community type (Appendix F, MHCP Vol. II, p. F-3). Areas that formerly would have been classified as ruderal now fall into one of the categories defined in Appendix F: annual (nonnative) grassland, disturbed land, or agricultural (including fallow) land. The final MND should change the ruderal vegetation type to the appropriate vegetation community type based on the definitions in Appendix F. 2-6

2. The final MND should require mitigation for impacts to annual (nonnative) grassland at a 0.5:1 ratio consistent with the MHCP. 2-7

3. According to the draft MND, approximately 0.1 acre of Diegan coastal sage scrub will not be impacted by the proposed project. This 0.1 acre is in three localized areas and will not continue to provide any value for wildlife. Therefore, the Wildlife Agencies would consider all the Diegan coastal sage scrub on the Project site to be impacted and recommend that mitigation be provided accordingly. 2-8

4. According to the draft MND, fuel modification zones B and C for the proposed project will overlap existing conservation easements on adjacent parcels. Please provide information regarding the origin of these easements (i.e., for what projects did they provide mitigation). Fuel modification is generally not allowed within mitigation areas or conservation easements. All fuel modification should be contained within the existing property boundaries. Therefore, we recommend that the proposed project be redesigned to remove all fuel modification from adjacent properties. 2-9

5. Any required fuel modification should be consistent with the *Memorandum of Understanding between the Fish and Wildlife Service of the United States Department of Interior, the California Department of Fish and Game, the California Department of Forestry, the San Diego County Fire Chief's Association and the Fire District's Association of San Diego County* (dated February 26, 1997). 2-10

6. The draft MND states that the mitigation requirement for impacts to Diegan coastal sage scrub will be met through on-site preservation, purchase of credits from an approved mitigation bank, or a combination thereof. Because the on-site areas are too small to provide values for wildlife and serve as useful mitigation, we recommend that all mitigation requirements (both Diegan coastal sage scrub and annual grassland) be met off site through the purchase of credits at a mitigation bank approved by the City and Wildlife Agencies. 2-11

7. The final MND should provide a table that shows impacts to all vegetation types from project construction and fuel modification, taking into account the proposed boundary line adjustment. 2-12

Mr. Garth Koller (FWS/CDFW-SDG-15B0008-15CPA0004) Enclosure, Page 2

8. We do not concur that mitigation should not be required for permanent impacts to areas that may be periodically cleared along Mission Road per County of San Diego Code Section 4907.2.1. Therefore, the final MND should require mitigation for impacts to these areas. 2-13

Letter 2
United States Fish and Wildlife Service/California Department of Fish and Wildlife

2-1 This comment provides introductory remarks and details the role of the USFWS and CDFW in protecting natural resources. This comment does not raise any specific environmental issues so no further comment is warranted.

2-2 This comment reiterates the project description and does not raise any specific environmental issues.

2-3 This comment addresses impacts associated with the proposed fuel modification in Zones B and C. Table 6a of the IS/MND has been updated to reflect habitat types on site and within the proposed fuel modification Zones B and C. The table is also provided below.

Table 6a. Habitat Types (Onsite and within Fuel Modification Zones B and C)

Habitat Type	Onsite (Acres)	Offsite (Acres) (1)	Total
Diegan Coastal Sage Scrub (Tier II)	3.7	0.11	3.81
Urban/Developed (Tier IV)	4.1	0.43	4.53
Disturbed (Tier IV)	1.2	0.04	1.24
Total	**9.0**	**0.58**	**9.58**

(1) Offsite areas within Fuel Modification Zones B and C

2-4 The calculation for Diegan coastal sage scrub (DCSS) impacts has been updated. The project will impact 3.7 acres of DCSS onsite and 0.11 acres of DCSS offsite associated with the proposed fuel modification for a total of 3.81 acres of impact. The IS/MND has been updated to reflect these new impacts numbers. Mitigation measure MM BIO-1 has also been updated to reflect the requirement for 3.81 acres of habitat mitigation for the increased impacts to DCSS habitat.

2-5 This comment provides closing remarks to the introductory letter and referenced an attachment. Responses 2-6 through 2-12 address comments raised in the attachment.

2-6 The area described as ruderal in the Draft IS/MND has been reclassified as either urban/developed or disturbed. Please see Table 6a of the Final IS/MND.

2-7 The project site does not support any non-native grasslands. The areas previously classified as ruderal have been reclassified as urban/developed or disturbed. Therefore the project will not impact nonnative grasslands and no mitigation is required for this habitat.

2-8 The calculation for Diegan coastal sage scrub (DCSS) impacts has been updated. The 0.1 acre of DCSS proposed to be left on site is now identified as being impacted.

2-9 The project proposes to establish fuel modification Zones B and C within adjacent real property that is subject to a Conservation Easement Deed dated April 25, 2002 granted by Klass de Haan in favor of The Environmental Trust, Inc., and recorded in the Official Records of San Diego County on September 27, 2002 as Instrument No. 2002-0833478 ("Conservation Easement"). These fuel modification zones are required to comply with the San Marcos Municipal Code section 17.64.240, which requires 150-feet of brush clearance from structures. No coastal California gnatcatchers were detected within the proposed fuel modification zones during protocol-level surveys conduction April to June 2014.

The proposed fuel modification zones are being created with the approval of the neighboring property owner, the Conservation Easement manager, and the City of San Marcos. The Conservation Easement was put in place in 2002 to protect coastal sage scrub habitat in connection with entitlements for the adjacent property. The original management agency was The Environmental Land Trust, Inc. That entity subsequently filed bankruptcy and a new conservation manager was put in place, Golden State Land Conservancy. Golden State Land Conservancy finds the brush management beneficial to the existing conservation easement because with little remaining endowment, they can no longer clear the area of non-natives. The current proposal would shift clearing obligations to the Project as part of the Project's Fire Protection Plan and a pending brush management easement, the terms of which have been approved by all parties.

It is important to note that the existing Conservation Easement does not prohibit fuel modification activities contemplated by the Project. Section 3(a) of the Conservation Easement only prohibits "incompatible fire protection activities." Pursuant to Section 3(g) of the Conservation Easement, fire breaks required to be maintained by law are not prohibited by the terms of the Conservation Easement. Brush management within the Conservation Easement areas is required to comply with San Marcos Municipal Code fire safety requirements and protect public safety in general, and therefore cannot be characterized as "incompatible fire protection activities" or otherwise prohibited by the Conservation Easement. The proposed fuel modification activities described in the Mission 316 Fire Protection Plan will be carefully conducted using special clearing techniques, including selective hand-clearing of the most highly flammable plants and retaining small patches of native vegetation. Such brush management includes:

- Removal of all dead and dying plant materials and trimmings
- Native, non-irrigated vegetation shall be retained by breaking up continuity between patches of continuous fuels. A 20-foot on-center spacing between patches of native vegetation is desireable.
- Maintain grasses to 18 inches.
- Minimum 20 feet between tree canopies.
- Single specimen native shrubs, exclusive of sagebrush, may be retained 20 feet on center.

Clearing activities would not occur during the nesting period between February 15 and August 15.

The proposed fuel modification activities are consistent with the Conservation Easement's habitat management plan – the Land Management Plan for Hilltop Environmental Preserve, dated January 31, 2002, which contemplated that brush management would occur within the Conservation Easement Area. It required the conservation manager to provide input on fire control activities that are "best" for the conservation easement property. Here, Golden State Land Conservancy has advised that allowing the Project to maintain fuel modification zones within the Conservation Easement would benefit the conservation easement area by ensuring that clearing of non-native species would occur.

2-10 The MOU referenced in this comment pertains to existing development. To address fire safety and fire fuel modification, a Fire Protection Plan was prepared for the project and was reviewed and approved by the City of San Marcos Fire Marshal. See Attachment A, immediately after this response letter, for correspondence from the City's Fire Marshal stating the project complies with the City Code and that a reduction of the fire clearing requirements is not justified based upon the site's fuels, terrain and hazards potential.

2-11 Mitigation measures MM BIO-1 has been revised to note that mitigation shall be through either preservation in the City of San Marcos, purchase of credits from an approved mitigation bank, or a combination thereof, as approved by the Planning Director. Onsite mitigation is no longer proposed as an option.

2-12 Table 6b has been added to the Final IS/MND that shows impacts to all vegetation types from project construction and fuel modification taking into account the proposed boundary line adjustment. The table is also provided below:

Table 6b. Habitat Impacts from Development and Fuel Modification Zones B and C

Habitat Type	Development Impacts (Acres)	Fuel Modification Impacts (Acres)	Total
Diegan Coastal Sage Scrub (Tier II)	3.7	0.11	3.81
Urban/Developed (Tier IV)	4.1	0.43	4.53
Disturbed (Tier IV)	1.2	0.04	1.24
Total	**9.0**	**0.58**	**9.58**

2-13 The calculation for Diegan coastal sage scrub (DCSS) impacts has been updated and now includes an impact assumption for areas that were allowed to be cleared along Mission Road per County of San Diego Code Section 4907.2.1. Overall, the project will impact 3.81 acres of DCSS. This includes 3.7 acres onsite and 0.11 acres offsite associated with fire fuel modification. Mitigation measures MM BIO-1 will require mitigation at a 1:1 ratio for loss of DCSS and will reduce the impact to below a level of significance.

ATTACHMENT A to Response to Comments for Letter 2
Letter from City of San Marcos Division Chief- Fire Marshal Robert Scott
(Referenced in response 2-10, above)

1 Civic Center Drive
San Marcos, CA 92069-2918

Telephone
760.744.1050
FAX: 760.744.5213

October 20, 2014

Mr. Garth Koller
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92078

Re: FWS/CDFW-SDG-15B0008-15CPA0004

Garth,

In regard to the proposed Mission 316 project and the Fuel Management Zone; this project's proposed Fire Protection Plan (FPP) has been reviewed and approved by the fire department. The FPP currently complies with City Code requirements. A site-wide reduction of the Fuel Management Zone width is not justified based on the site's fuels, terrain, and potential hazard.

If you should have any questions or need additional information, please let me know.

Sincerely,

Robert Scott

Robert Scott
Division Chief-Fire Marshal

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

October 15, 2014

Garth Koller
City of San Marcos
1 Civic Center Drive
San Marcos, California 92069

Dear Garth:

SUBJECT: SCH 2014091041 San Marcos (San Diego) Mission 316 Specific Plan - DMND

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings and Engineering Branch (RCEB) is in receipt of the draft *Mitigated Negative Declaration (DMND)* for the proposed City of San Marcos (City) Mission 316 Specific Plan Project.

The project area includes active railroad tracks. RCEB recommends that the City add language to the Mission 316 Specific Plan so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW. 3-1

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

Letter 3
California Public Utilities Commission

3-1 The project site does not contain railroad tracks nor is it adjacent to a rail line. Mission Road separates the project site from the SPRINTER rail line. The project does not propose the construction or alteration of any crossings. The traffic report prepared for the project did not identify any traffic impacts or safety issues related to rail crossings.

PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 308-9295 • Fax (951) 506-9491

October 15, 2014

VIA E-Mail and USPS

Ms. Susan Vandres Rodriguez
Associate Planner/Tribal Liaison
City of San Marcos
Planning Department
1 Civic Center Drive
San Marcos, CA 92069-2949

Re: Pechanga Tribe Comments on the Notice of Intent for the Initial Study/Mitigated Negative Declaration (IS/MND) for P14-0001, GPA 14-001, R14-001, SP14-001, MFSDP14-001, TSM14-001, CUP14-016, ND14-007, Mission 316 Project

Dear Ms. Vandrew Rodriguez:

This comment letter is submitted by the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government, in response to the Notice of Intent for the Initial Study/Mitigated Negative Declaration (IS/MND) for the above named project.

The Tribe is in agreement with the proposed mitigation measures for cultural resources as presented in the document for this Project and request that they be incorporated into the final MND and added as conditions of approval for the Project. San Marcos is a culturally significant area and the Tribe appreciates the opportunity to preserve and protect the sensitive Luiseño cultural resources and to monitor earthmoving activities in the area. The Tribe thanks the City for the inclusion of the proposed mitigation measures which address the potential impacts to cultural resources, and for the inclusion of the Tribe in those measures.

The Pechanga Tribe looks forward to continuing to work together with the City of San Marcos in protecting the invaluable Luiseño cultural resources found in the City. Please contact me at 951-770-8104 if you have any questions or comments.

4-1

Sincerely,

Anna M. Hoover
Cultural Analyst

cc: Pechanga Office of the General Counsel

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Letter 4
Pechanga Cultural Resources

4-1 This comment letter states that the Pechanga Band of Luiseño Indians agrees with the proposed mitigation measures for cultural resources. The cultural resources mitigation measures are included in the mitigation monitoring and reporting program and implementation of the mitigation measures will be required as a condition of project approval.

RINCON BAND OF LUISEÑO INDIANS
Culture Committee
1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2621 or·(760) 297-2622 & Fax:(760) 749-8901

October 8, 2014

Garth Koller
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

Re: Mission 316 Specific Plan

Dear Mr. Koller:

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your notification dated September 15, 2014, and we thank you for the continued consultation on the Mission 316 Specific Plan Project. The location you have identified is within the Aboriginal Territory of the Luiseño people, and is also within Rincon's historic boundaries.

The Luiseño Aboriginal Territory has significant meaning to Rincon's history, culture, and identity, and this area possesses known and yet to be discovered cultural resources. The project area is within our Traditional Use Area thus there is a high probability for cultural findings and discoveries. Rincon's concerns are that any ground disturbing activities could destroy resources that we regard as Culturally Significant.

We are not opposed to the project but do request continued consultation. We also are requesting that the Rincon Cultural Resources Department be afforded the opportunity to provide the Native American Monitor for this project.

If there are any questions please do not hesitate to contact our office at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

5-1

Sincerely,

Rose Duro
Rincon Culture Resources Department

Letter 5
Rincon Band of Luiseño Indians

5-1 This comment letter states that the project site is within the Aboriginal Territory of the Luiseño people and within Rincon's historic boundaries. The letter also notes the potential for cultural resources to be encountered during ground disturbing activities.

While the cultural resources survey did not identify any cultural resources on the site, the Draft IS/MND noted the potential for unidentified resources to be encountered during ground disturbing activities (Impact CR-1). Mitigation measures (MM CR-1 through MM CR-8) were included in the Draft IS/MND which require monitoring by an archaeologist and a Luiseño Native American during project grading. Implementation of these mitigation measures will be required as a condition of project approval and will reduce potential impacts to below a level of significance.

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4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION AND SUMMARY

Pursuant to Section 21081.6 of the Public Resources Code and the *California Environmental Quality Act (CEQA) Guidelines* Section 15097, public agencies are required to adopt a monitoring or reporting program to assure that mitigation measures and revisions identified in the Mitigated Negative Declaration (MND) are implemented. As stated in Section 21081.6 of the Public Resources Code:

> *"… the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment."*

Pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision makers coincidental to certification of the MND. The Mitigation Monitoring and Reporting Program (MMRP) must be adopted when making the findings (at the time of approval of the project).

As defined in the CEQA Guidelines, Section 15097, "reporting" is suited to projects that have readily measureable or quantitative measures or which already involve regular review. "Monitoring" is suited to projects with complex mitigation measures, such as wetland restoration or archaeological protection, which may exceed the expertise of the local agency to oversee, are expected to be implemented over a period of time, or require careful implementation to assure compliance. Both reporting and monitoring would be applicable to the proposed project.

The Initial Study/ Mitigated Negative Declaration prepared for the Mission 316 Specific Plan provided an analysis of the environmental effects resulting from construction and operation of the project.

4.2 MITIGATION MATRIX

To sufficiently track and document the status of mitigation measures, a mitigation matrix has been prepared and includes the following components:

- Impact
- Mitigation Measure
- Action
- Timing
- Responsibility

The mitigation matrix is included in Table 4-1. Additionally, the project will be required to adhere to the design features presented in Table 4-2.

Table 4-1. Mitigation Measures

Impact	Mitigation Measure	Action	Timing	Responsibility
BIOLOGICAL RESOURCES				
Project impacts 3.81 acres of Diegan coastal sage scrub, a sensitive habitat, which also supports orange throated whiptail.	**MM-BIO-1** Permanent impacts to 3.81 acres of Diegan coastal sage scrub shall be mitigated through either preservation in the City of San Marcos, a purchase of credits from an approved mitigation bank, or a combination thereof, as approved by the Planning Director.	Purchase of off-site Tier II habitat or payment of in-lieu fees.	Prior to project construction	Applicant
Potential to impact nesting raptors if construction occurs during the raptor breeding season.	**MM-BIO-2** If grading is scheduled to occur during the raptor breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist for active nests shall be completed prior to construction activities. If active nests are identified, additional mitigation in conformance with the City's Biology Guidelines shall be implemented to the satisfaction of the City and wildlife agencies (i.e., appropriate buffers, monitoring schedules, etc.). Within three months following the completion of any required monitoring, two copies of the Final Biological Monitoring Report and/or evaluation report which describes the results, analysis, and conclusions of the Biological Monitoring Program shall be submitted to the City and wildlife agencies. The report shall address findings of active/inactive nests and any recommendations for retention of active nests, removal of inactive nests, and mitigation for offsetting loss of breeding habitat.	Preconstruction surveys prior to grading if grading proposed during the raptor breeding season.	Prior to any grading activities during the raptor breeding season	Applicant and project biologist
Potential to impact breeding and nesting birds if construction occurs during the raptor breeding season.	**MM-BIO-3** During the avian breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist shall occur prior to issuance of grading permits or removal of trees. If active nests are identified, construction activities shall adhere to appropriate noise buffer zone restrictions. The buffer shall be maintained until the qualified biologist determines that any young birds have fledged. Written results of such surveys shall be submitted to and be approved by City staff and wildlife agencies.	Preconstruction surveys prior to grading if grading proposed during the bird nesting season.	Prior to any grading activities during the avian breeding season.	Applicant and project biologist

Impact	Mitigation Measure	Action	Timing	Responsibility
CULTURAL RESOURCES				
While no resources were identified on the project site, the site's location near CA-SDI-749 warrants monitoring by a qualified archaeological monitor and a Native American monitor to prevent accidental disturbance of any intact cultural deposits that were not identified on the project site.	**MM-CR-1** A qualified archeological monitor and a *Luiseño* Native American monitor shall be present during all earth moving and grading activities to assure that any potential cultural resources, including tribal, found during project grading be protected.	Monitoring of earthmoving and grading activities.	During grading and earthmoving activity	Applicant, Archaeological Monitor, and Tribal Monitor
	MM CR-2 Prior to beginning project construction, the Project Applicant shall retain a San Diego County qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to cultural resources evaluation, which shall include archaeological documentation, analysis and report generation and take into account tribal customers and traditions.	Retention of an archaeological monitor to monitor ground disturbing activities.	At least 30 days prior to grading the applicant shall execute a Cultural Resources and Treatment agreement with the	Applicant
	MM-CR-3 At least 30 days prior to beginning project construction, the Project Applicant shall enter into a Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a *Luiseño* Tribe. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site.	Development of a Cultural Resources Treatment and Monitoring Agreement.	At least 30 days prior to grading the applicant shall execute a Cultural Resources and Treatment agreement with the	Applicant and Pechanga Band
	MM-CR-4 Prior to beginning project construction, the Project Archaeologist shall file a pre-grading report with the City to document the proposed methodology for grading activity observation, which will be determined in consultation with the contracted Luiseño Tribe referenced in MM-CR-3. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority	Filing of a pre-grading report with the City.	Prior to project construction.	Applicant

Impact	Mitigation Measure	Action	Timing	Responsibility
	to stop and redirect grading activities. In accordance with the agreement required in MM-CR-3, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation the Luiseño Native American monitor in order to evaluate the significance of any archaeological resources discovered on the property. Tribal and archaeological monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities, and shall also have the authority to stop and redirect grading activities.			
	MM-CR-5 The landowner shall relinquish ownership of all cultural resources collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site to the appropriate Tribe for proper treatment and disposition per the Cultural Resources Treatment and Monitoring Agreement referenced in MM-CR-3. All cultural materials that are deemed by the Tribe to be associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98. In the event that curation of cultural resources is required, curation shall be conducted by an approved facility and the curation shall be guided by California State Historic Resource Commissions Guidelines for the Curation of Archaeological Collections. The City of San Marcos shall provide the developer final curation language and guidance on the project grading plans prior to issuance of the grading permit, if applicable, during project construction.	Landowner shall relinquish any cultural resources found on the site to the appropriate Tribe.	At the time resources are found.	Applicant
	MM-CR-6 All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.	Avoidance and preservation (if feasible) of sacred sites	At the time of encounter	Applicant

Impact	Mitigation Measure	Action	Timing	Responsibility
	MM-CR-7 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Suspected Native American remains shall be examined in the field and kept in a secure location at the site. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. The NAHC must then immediately notify the "most likely descendant(s)" of the discovery. The most likely descendants(s) shall then make recommendations within 48 hours, and engage in consultation concerning treatment of remains as provided in Public Resources Code 5097.98.	Halting of construction and contact NAHC.	At the time human remains are encountered	Applicant
	MM-CR-8 If inadvertent discoveries of subsurface archaeological/cultural resources, not included human remains or associated burial goods which is addressed in MM-CR-7, are discovered during grading, the Developer, the project archaeologist, and the Luiseño Tribe under agreement with the landowner described in MM-CR-3 shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological resources. If the Developer, the project archaeologist and the Tribe cannot agree on the significance of mitigation for such resources, these issues will be presented to the Planning Director for decision. The Planning Director shall make a determination based upon the provisions of the California Environmental Quality Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Tribe. Notwithstanding any other rights available under	Halt construction and assess significance or resources.	At the time inadvertent discoveries are encountered	Applicant

Impact	Mitigation Measure	Action	Timing	Responsibility
	law, the decision of the Planning Director shall be appealable to the Planning Commission and/or City Council.			
NOISE				
Select second floor balconies will have elevated exterior noise levels. This represents a significant impact.	**MM-N-1** A 4-foot high noise barrier shall be required for second floor balconies of the units along Mission Road as shown in **Figure 11**. The barriers shall be constructed of non-gapping materials such as masonry stone, ¼ inch-thick glass, Plexiglass, or a combination of these materials architecturally integrated with the project. Verification of the type of noise reduction barrier material shall be provided to the Planning Director for review and approval prior to grading permit issuance. The barrier shall reduce the exterior noise levels to comply with the City of San Marcos Noise standards of 65 dBA CNEL at the multi-family residences and any outdoor usable areas. Afinal noise assessment shall be prepared prior to the issuance of the first building permit. This final report would identify the interior noise requirements based upon architectural and building plans to meet the City's established interior noise limit of 45 dBA CNEL.	Construction of noise attenuation features	Prior to occupancy of residences with balconies that face Mission Road.	Applicant
Proposed rock crushing activities will create sounds levels that exceed 60 dBA Leq.	**MM-N-2** Noise mitigation will be required for the crusher to break line of site from the crusher to nearby residences. Shielding can be achieved through an earthen berm, 5/8-inch plywood, 1-inch acoustical blankets, or a combination of these strategies. Earthen berm and/or plywood shall be one to two feet above the top of the crushing equipment to break line-of-site between the crusher and off-site residences. The reductions shall achieve 60 dBA Leq. **Figure 12** shows the general location of the crusher and the placement of the required mitigation. Noise measurements shall be conducted once the crusher is in place and noise mitigation is implemented to ensure the 60 dBA Leq requirement is met. If noise levels are found to be above the established thresholds of 60 dBA at any existing single family residential use, 65 dBA for any multifamily use or 70 dBA at a commercial use then additional mitigation in the form of	Berming and/or shielding of the rock crusher to keep noise levels within City standards. Noise measurements to be take to confirm reductions have been met.	Prior to operation of the crusher.	Applicant

Impact	Mitigation Measure	Action	Timing	Responsibility
	higher barriers, sound absorbing materials or operational limits on the crushers usage will need to be incorporated to meet the required thresholds.			
TRANSPORTATION/TRAFFIC				
Existing trees in the median of Mission Road limit visibility and the minimum required stopping sight distance is not met. This represents a significant impact	**MM-TR-1** All trees in the median of Mission Road affected by the design of the turning lane and the line of sight distance shall be addressed by the applicant/developer. Prior to removal, the applicant/developer shall deposit sufficient funds allowing the City to hire a Certified Arborist to assess the value of trees and replacement ratio. Pending the Arborist's report, the City shall determine the feasibility of relocating the affected trees or an appropriate replacement ratio and size for the replacement of the trees at the cost of the applicant/ developer. The applicant/developer shall be responsible for tree removal prior to any construction related to the median improvements. Finally, the project applicant/developer shall replace all affected landscaping in the median. Proposed replacement landscaping selections for the median shall be reviewed and approved by the Department of Public Works. The replacement landscaping shall be maintained to a height not to exceed 36 inches.	Tree assessment prior to tree removal and replacement and/or relocation of trees as determined by City. Replacement of landscaping in median.	Prior to removal of trees.	Applicant

Table 4-2. Design Considerations for the Project

Aesthetics • Lighting plan to be reviewed and approved by the Planning Director. • Incorporates architectural enhancement including enhanced buildings materials, varied rooflines and wall planes.
Air Quality • The project shall implement fugitive dust control measures. These measures include watering the site a minimum of twice daily, reducing speeds on unpaved surfaces to 15 miles per hour or less, replacing ground cover in disturbed areas quickly, and reducing dust during loading/unloading of dirt and other materials. • Low-VOC coatings shall be used for all buildings, as required under SDAPCD Rule 67.0.
Geology/Soils • All structures on the site would be designed in accordance with seismic parameters of the current California Building Code (2013).
Hazards/Hazardous Materials • Debris and trash on the project site shall be collected and disposed in accordance with federal, state, and local regulations. • Implementation of the Fire Protection Plan for the project. • Applicant/developer shall obtain a grant of easement for the off-site fuel management zones along the western and northern edge of the development.
Hydrology/Water Quality • The project will be required to provide a design to mitigate water quality and HMP under the land development requirements deemed to be in effect of the Regional Stormwater permit R9 2013-0001 and the currently adopted Standard Urban Stormwater Mitigation Plan (SUSMP). • Mark all inlets with the words “No Dumping! Drains to Waterways” and “No Contamine” in Spanish. • Landscaping has been designed to minimize irrigation and runoff and to minimize the use of fertilizers and pesticides that can contribute to storm water. • Sidewalks, parking lots and roads shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing will be collected to prevent entry into the storm drain system. Wash water containing any cleaning agents or degreaser shall be collected and discharged to the sanitary sewer and not discharged to a storm drain. • Trash container area to be screened or walled to prevent off-site transport of trash. • Provide roofs, awnings or attached lids on all trash containers to minimize direct precipitation and prevent rainfall from entering containers • Post signs on all dumpsters informing residents that hazardous material are not to be disposed of. • Implementation of all construction-related BMPs identified in the SWPPP.
Noise • A speed limit of 15 MPH shall be posted along the on-site haul route along with signage limiting the use of “jake” brakes. • All construction equipment shall be properly fitted with mufflers. • Compliance with Title 17 of the City’s Municipal Code relating to blasting operations.

Public Services – Fire • Roadways serving the project shall have a minimum improved paved width of 24 feet with an additional 8 feet to each side for parking. Any other roadway features such as cul-de-sacs and gates must meet the design criteria of the San Marcos Fire Department. • Knox key boxes shall be installed for emergency access to all structures. • Any automatic gates are required to have a Knox rapid entry system and emergency vehicle strobe detector. • Fire hydrants with an adequate water supply must be installed at locations approved by the San Marcos Fire Department. Hydrant spacing shall be 300 feet apart for multi-family areas. For single-family areas, hydrants shall be spaced 600 feet apart. • Residential structures shall be outfitted with automatic fire sprinklers and alarms per California Building Code 2010 edition and City Ordinance.
Traffic • Prior to any construction activities associated with proposed project, the applicant shall submit a haul route plan for review and approval by the City Engineer.
Utilities and Services Systems • Payment of Water Capital Facility Fees per Vallecitos Water District Ordinance No. 175. • Payment of Wastewater Capital Facility Fees per Vallecitos Water District Ordinance No. 176. • Payment of Wastewater Density Impact Fees per Vallecitos Water District Ordinance No. 177.

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LIST OF APPENDICES (Appendices included on CD in back of document)

LIST OF FIGURES

LIST OF TABLES

LIST OF TABLES (continued)

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I. INTRODUCTION

I. PURPOSE

This document is an Initial Study (IS) for preliminary evaluation of environmental impacts resulting from implementation of the Mission 316 Specific Plan. For the purposes of this document, this proposed development as described in Section II, Project Description, will be called the "proposed project."

II. CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS

As defined by Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines, an Initial Study is prepared to provide the Lead Agency with information to use in deciding to prepare either an Environmental Impact Report (EIR) or a Negative Declaration (ND) as the most appropriate environmental documentation for the proposed discretionary action. The City of San Marcos (City) is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency with the principal responsibility for approving a project that may have significant effects upon the environment.

Through this IS, the City has determined that although the project could have a significant effect on the environment, mitigation has been included to bring all potential impacts to less than significant levels. This determination was made based upon technical analysis, factual data, and other supporting documentation. Therefore, a Mitigated Negative Declaration (MND) is being proposed. The IS/MND will be circulated for a period of 30 days for public and agency review. Comments received on the document will be considered by the City before it acts on the proposed project.

This IS has been prepared in conformance with CEQA of 1970, as amended (Public Resources Code, Section 21000 et. seq.) and Section 15070 of the State Guidelines for Implementation of CEQA of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et seq.).

III. INTENDED USES OF INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This IS, along with the attached MND, is an informational document intended to inform City decision-makers, other responsible or interested agencies, and the public of potential environmental effects of the proposed project. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts.

IV. CONTENTS OF DOCUMENT

This IS/MND is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed project as follows:

I. INTRODUCTION identifies the City contact persons involved in the process, scope of environmental review, environmental procedures, and incorporation by reference documents.

II. PROJECT DESCRIPTION describes the proposed project. A description of proposed discretionary approvals and permits required for project implementation is also included.

III. ENVIRONMENTAL CHECKLIST FORM presents the results of the environmental evaluation for the proposed project and those issue areas that would have a significant impact, potentially significant impact, a less than significant impact with mitigation incorporation, or no impact.

IV. ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked is discussed and supported with sufficient data and analysis. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation. In this section, mitigation measures are also recommended, as appropriate, to reduce adverse impacts to levels of "less than significant" where possible. This section also presents the Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

V. DOCUMENT PREPARERS identifies those persons consulted and involved in preparation of this IS.

VI. REFERENCES lists bibliographical materials used in preparation of this document.

VII. MITIGATED NEGATIVE DECLARATION

VIII. FINDINGS

V. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the environmental checklist form is stated and responses are provided according to the analysis undertaken as part of the Initial Study. All responses take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Project impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the referenced information sources show that the impact simply does not apply to the proposed project.

2. **Less Than Significant Impact:** Development associated with project implementation will have the potential to impact the environment. These impacts, however, will be less than the thresholds that are considered significant and no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The Lead Agency must describe the mitigation measures and explain how the measures reduce the effect to a less than significant level.

4. **Potentially Significant Impact:** Future implementation will have impacts that are considered significant and additional analysis and possibly an EIR are required to identify mitigation measures that could reduce these impacts to less than significant levels.

VI. PERMITS AND ENTITLEMENTS FOR PROJECT APPROVAL

Agency	Discretionary Action
City of San Marcos	• General Plan Amendment (GPA 14-001) • Zoning Ordinance Amendment (R 14-001) • Adoption of the Specific Plan (SP 14-001) • Tentative Subdivision Map (TSM 14-001) • Multifamily Site Development Plan (MFSDP 14-001) • Conditional Use Permit (CUP 14-016) • Adoption of Mitigated Negative Declaration (ND 14-007) • Adoption of Mitigation Monitoring and Reporting Program

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II. PROJECT DESCRIPTION

A. PROJECT LOCATION AND SETTING

The Mission 316 Specific Plan project site currently consists of three parcels (APN 220-210-46, 220-210-41, and 220-210-10 totaling approximately 9.27 acres. As part of project approval, a boundary adjustment to APN 220-210-10 from 3.43 acres to 3.4 acres will occur.~~of 0.29 acres to the landowner north of the project site will occur~~. This adjustment brings the project area to 9.0 acres. ~~8.98 acres.~~

The project site is located in the City of San Marcos in North San Diego County, generally north of Mission Road between Woodward Street and Falcon Place. The project site is undeveloped except for an existing San Diego Gas & Electric power lines that traverse the southern portion of the site. Portions of the site were previously graded.

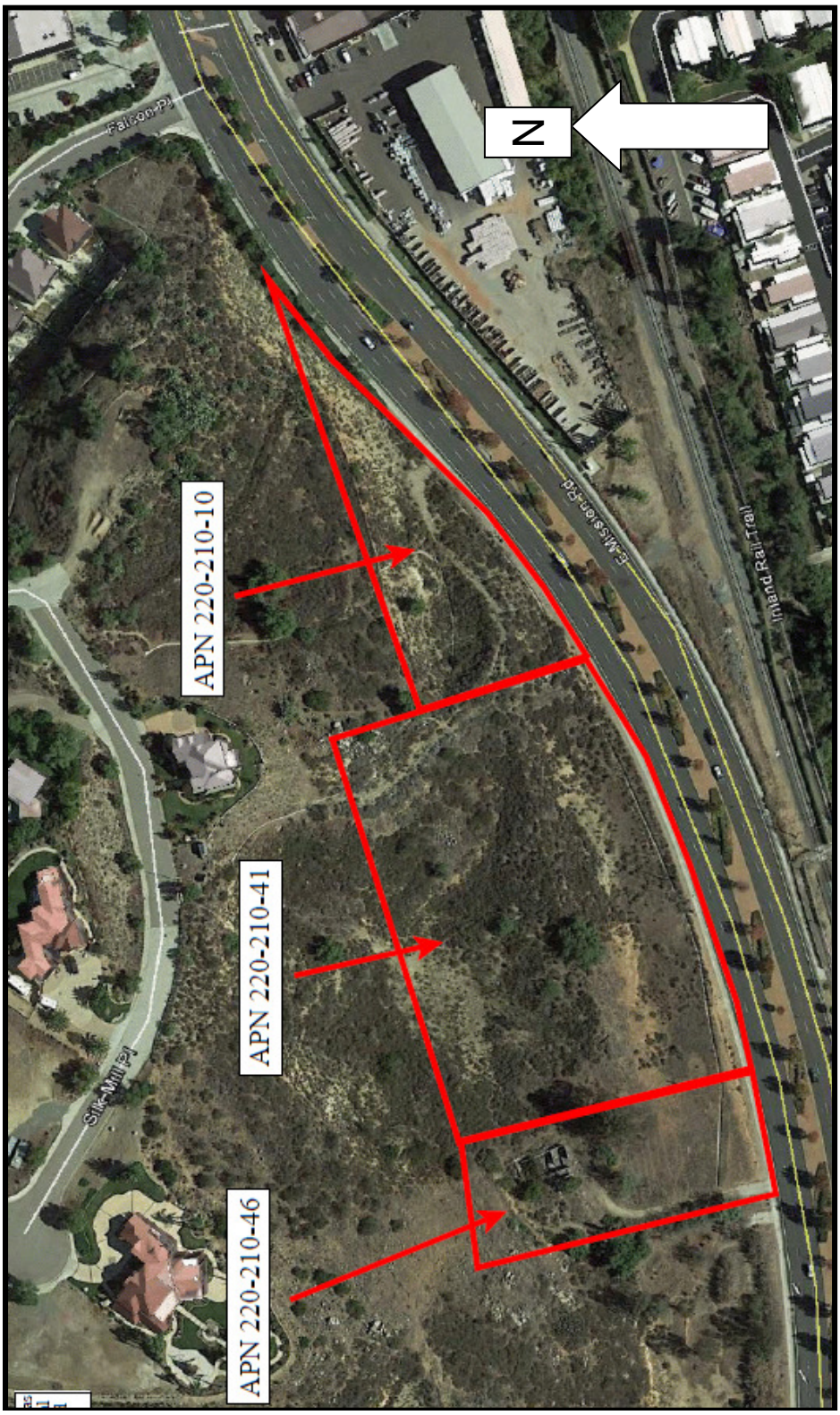
The project site is bounded on the west and east by undeveloped land, on the north by existing residential and disturbed open space, and on the south by Mission Road (**Figure 1**). Further west is Woodward Street, Twin Oaks Valley Road, and residential development lies further north and east of the project site. Light commercial uses are also located east of the project site. The City of San Marcos Civic Center, an open space area, and the North County Health Services San Marcos Health Center is located farther south beyond Mission Road. The project site is currently vacant with the exception of remnants of a foundation of a former residence in the northwestern corner of the site.

B. PROJECT DESCRIPTION

The Mission 316 project proposes an attached residential condominium project of 95 residential units (**Figure 2**). The project is proposed to be constructed as a single-phase development. The Specific Plan for the project is included as **Appendix A** of this document. Objectives of the project, as identified in the Specific Plan, include:

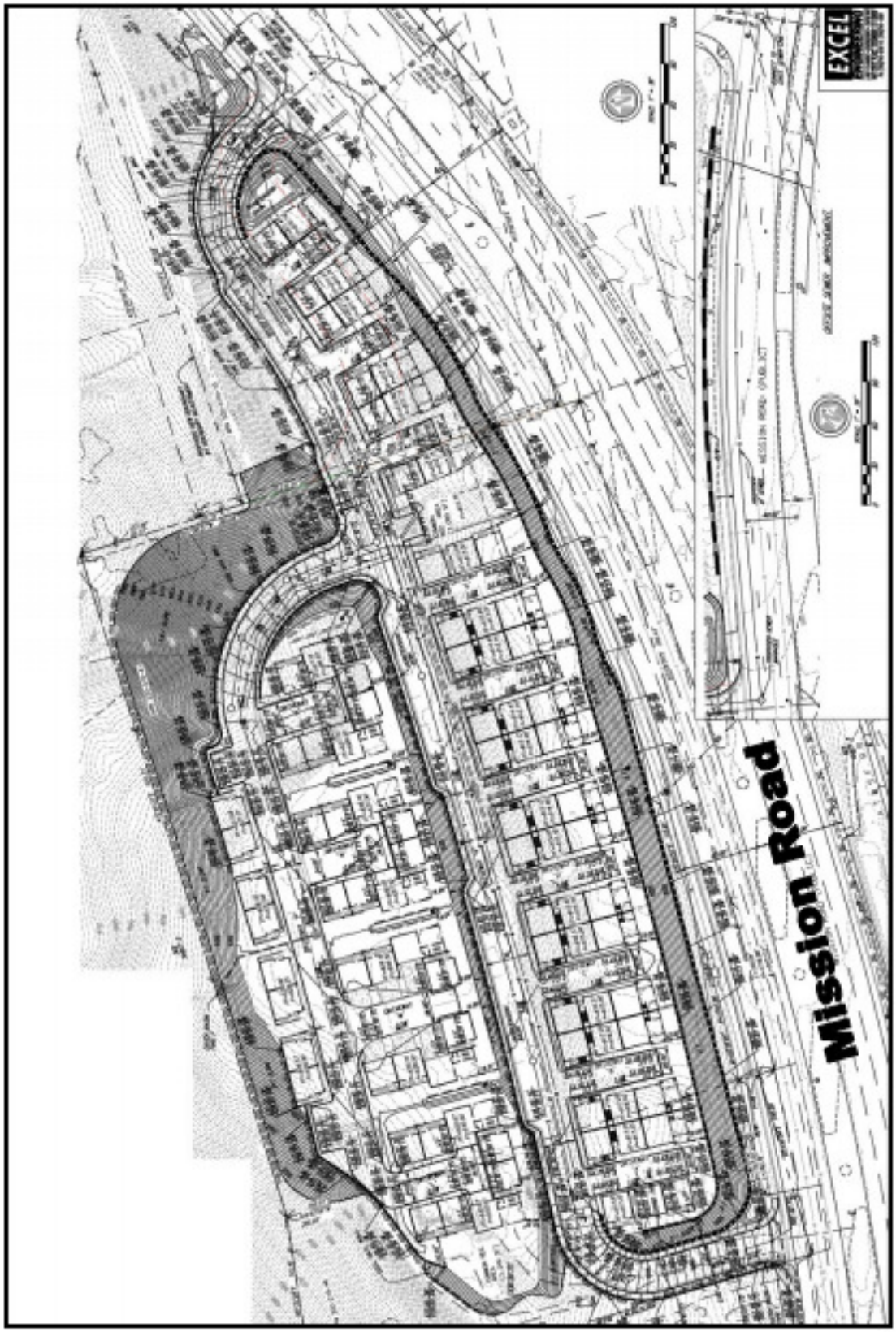
- Incorporate a low-medium density multi-family residential development into the neighborhood that serves as a transitional residential use to the surrounding low-density residential neighborhood;
- Provide new housing opportunities in the market by providing a range of unit sizes and a number of different bedroom counts including two, three, and four bedroom units to accommodate a large spectrum of family demographics and the growing housing needs of the region;
- Create a desired buffer to the adjacent developments and businesses by providing a logical transition of attached condominium units between the commercial, mobile home, and industrial uses to the south and east, and single-family residential development to the north, east, and west, and planned residential development to the east;
- Provide a visually pleasing street scene with medium-density development through architectural design, unified landscape theme, and recreation areas providing continuity along Mission Road;
- Design a safe and efficient circulation system that adequately supports the anticipated level of traffic in and around the Plan area that is pedestrian safe; and
- Develop a financing plan that provides for the efficient and timely provision of infrastructure and public services as development occurs.

Figure 1. Project Site



Source: AEC, LLC
Not to Scale

Figure 2. Residential Site Development Plan



Attached Residential - The project proposes 95 attached multi-family condominium homes across 21 condominium buildings. The homes will range from approximately 1,400 square feet (s.f.) to 1,990 s.f. and feature two or three bedrooms, depending on the home plan and layout. The attached homes will be three stories with a maximum building height of 45 feet.

Parking – A total of 213 parking spaces are proposed as part of the project. This includes two garage spaces for each residential unit (190 spaces) plus an additional 23 guest parking spaces.

Open Space – A total of 5.27 acres of common and landscaped open space areas are proposed within the Specific Plan area. Over half of this total provides passive open space to be used by residents. Private patios and a bio-retention area comprise the remaining square footage.

Proposed Roadways – There are two access points to the project site from Mission Road. The internal road widths are generally 24 feet wide.

Utility Infrastructure – The project will connect to existing Vallecitos Water District (VWD) infrastructure for water and wastewater service. VWD has an existing water connection and will provide service to the site through existing lines in Mission Road. Onsite water circulation will be through a network of 3- or 4-inch pipes. A separate fire system within the plan area will be fed from an 8-inch public fire main. An 8-inch underground fire service main will serve the building sprinklers and hydrants on the project site.

VWD maintains an existing sewer lines in Mission Road and Falcon Place, approximately 435 feet east of the project site. As part of the project a segment of 8-inch sewer pipeline will be constructed to connect the project site with existing infrastructure in Falcon Place.

Water Quality Management – The project includes a comprehensive water quality management approach. The project incorporates bioretention features of various sizes for water quality and hydrology purposes. A total of 7,174 s.f. of bioretention areas are proposed on the project site. Additionally, the project will implement a variety of source control Best Management Practices (BMPs) to minimize the potential for pollutants such as sediment, trash, metals, bacteria, oil/grease and organics to reach the storm drain and off-site waterways.

Parcel Boundary Adjustments - The project site currently consists of three parcels (APN 220-210-46, 220-210-41, and 220-210-10) totaling approximately 9.27 acres. Due to a legal lot line mapping error between the project boundary and the two lots to the north (220-450-39 and 220-480-06) of the project site, a boundary adjustment shall be completed as part of project approval to correct this error to reduce the total acreage of this parcel from 3.43 acres to 3.14 acres. This adjustment will reduce the overall project acreage to ~~8.98~~9.0 acres and result in an increase of acreage to the parcels to the north. A conservation easement is recorded on the two parcels to the north. The overall acreage of the existing conservation easement on those parcels will remain the same.

Project Construction

Grading – Grading for the project includes 56,500 cubic yards (cy) of cut and 36,500 cy of fill with 20,000 cy of export. These grading quantities include adjustments for bulking, remedial work, and street and building undercuts. The export is expected to last for 45 work days, with approximately 100 truck trips per work day. A haul route permit from the City will be required for the import.

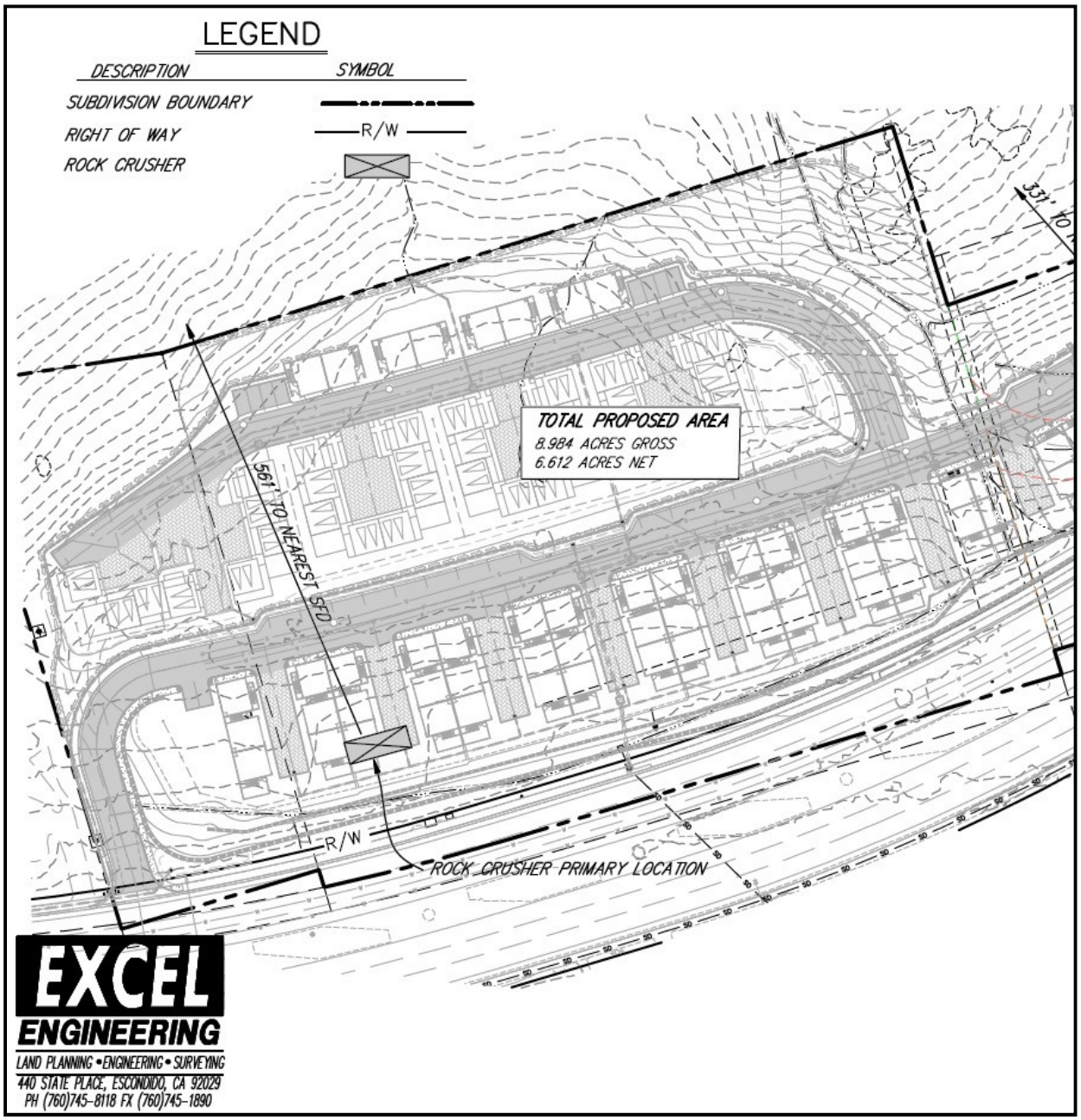
Blasting and Rock Crusher – Due to the bedrock on the project site, blasting will be required. Blasting is expected to occur over a two day period. A Conditional Use Permit for a temporary rock crusher is also

included as a discretionary action for the project. Rock crushing equipment will be located in the southwestern portion of the site, more than 500 feet from the nearest residence. The proposed rock crusher location is presented in Figure 3.

Construction Schedule – Site grading and infrastructure improvements are anticipated to start in early 2015, with vertical construction starting in October 2015 and project completion in January 2018.

Off Site Improvements – The only offsite improvement for the project is the construction of an 8-inch sewer line to connect the project site to existing infrastructure in Mission Road at Falcon Place.

Figure 3. Proposed Rock Crusher Location



Discretionary Actions – Discretionary approvals required for the project include:

- General Plan Amendment (GPA 14-001) modification of the Heart of the City Specific Plan to allow the Mission 316 Specific Plan.
- Zoning Ordinance Amendment (R 14-001) modification of the Heart of the City Specific Plan to allow the Mission 316 Specific Plan
- Adoption of the Specific Plan (SP 14-001)
- Tentative Subdivision Map (TSM 14-001)
- Multifamily Site Development (MFSDP 14-001)
- Conditional Use Permit (CUP 14-016)
- Adoption of Mitigated Negative Declaration (MND 14-007)
- Adoption of Mitigation Monitoring and Reporting Program

Project Design Features – The project includes design considerations and will adhere to applicable regulatory requirements, as identified in **Table 1**.

Table 1. Design Considerations for the Project

Aesthetics • Lighting plan to be reviewed and approved by the Planning Director. • Incorporates architectural enhancement including enhanced buildings materials, varied rooflines and wall planes.
Air Quality • The project shall implement fugitive dust control measures. These measures include watering the site a minimum of twice daily, reducing speeds on unpaved surfaces to 15 miles per hour or less, replacing ground cover in disturbed areas quickly, and reducing dust during loading/unloading of dirt and other materials. • Low-VOC coatings shall be used for all buildings, as required under SDAPCD Rule 67.0.
Geology/Soils • All structures on the site would be designed in accordance with seismic parameters of the current California Building Code (2013).
Hazards/Hazardous Materials • Debris and trash on the project site shall be collected and disposed in accordance with federal, state, and local regulations. • Implementation of the Fire Protection Plan for the project. • Applicant/developer shall obtain a grant of easement for the off-site fuel management zones along the western and northern edge of the development.
Hydrology/Water Quality • The project will be required to provide a design to mitigate water quality and HMP under the land development requirements deemed to be in effect of the Regional Stormwater permit R9 2013-0001 and the currently adopted Standard Urban Stormwater Mitigation Plan (SUSMP). • Mark all inlets with the words “No Dumping! Drains to Waterways” and “No Contamine” in Spanish. • Landscaping has been designed to minimize irrigation and runoff and to minimize the use of fertilizers and pesticides that can contribute to storm water. • Sidewalks, parking lots and roads shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing will be collected to prevent entry into the storm drain system.

Wash water containing any cleaning agents or degreaser shall be collected and discharged to the sanitary sewer and not discharged to a storm drain. • Trash container area to be screened or walled to prevent off-site transport of trash. • Provide roofs, awnings or attached lids on all trash containers to minimize direct precipitation and prevent rainfall from entering containers • Post signs on all dumpsters informing residents that hazardous material are not to be disposed of. • Implementation of all construction-related BMPs identified in the SWPPP.
Noise • A speed limit of 15 MPH shall be posted along the on-site haul route along with signage limiting the use of "jake" brakes. • All construction equipment shall be properly fitted with mufflers. • Compliance with Title 17 of the City's Municipal Code relating to blasting operations.
Public Services – Fire • Roadways serving the project shall have a minimum improved paved width of 24 feet with an additional 8 feet to each side for parking. Any other roadway features such as cul-de-sacs and gates must meet the design criteria of the San Marcos Fire Department. • Knox key boxes shall be installed for emergency access to all structures. • Any automatic gates are required to have a Knox rapid entry system and emergency vehicle strobe detector. • Fire hydrants with an adequate water supply must be installed at locations approved by the San Marcos Fire Department. Hydrant spacing shall be 300 feet apart for multi-family areas. For single-family areas, hydrants shall be spaced 600 feet apart. • Residential structures shall be outfitted with automatic fire sprinklers and alarms per California Building Code 2010 edition and City Ordinance.
Traffic • Prior to any construction activities associated with proposed project, the applicant shall submit a haul route plan for review and approval by the City Engineer.
Utilities and Services Systems • Payment of Water Capital Facility Fees per Vallecitos Water District Ordinance No. 175. • Payment of Wastewater Capital Facility Fees per Vallecitos Water District Ordinance No. 176. • Payment of Wastewater Density Impact Fees per Vallecitos Water District Ordinance No. 177.

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III. ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. **Project Title:** Mission 316 Specific Plan

2. **Lead Agency Name and Address:**
   City of San Marcos
   1 Civic Center Drive
   San Marcos, CA 92069

3. **Contact Person and Phone Number:**
   Mr. Garth Koller, Principal Planner
   760-744-1050, ext. 3231
   GKoller@san-marcos.net

4. **Project Location:** The project site is located in the City of San Marcos in North San Diego County, generally north of Mission Road between Woodward Street and Falcon Place. Specifically, the project site is bounded on the west and east by undeveloped land, on the north by existing residential and disturbed open space, and on the south by Mission Road.

5. **Project Sponsor's Name and Address:**
   Integral Communities
   2235 Encinitas Boulevard, Suite 216
   Encinitas, CA 92024

6. **General Plan and Zoning Designations:** The project site is designated Heart of the City Specific Plan in the City's General Plan. The zoning on the project site is also Heart of the City Specific Plan. Within the Heart of the City Specific Plan, the site is designated for Commercial uses. The project proposes a residential condominium project under a new Specific Plan. The new Specific Plan would serve as the guiding land use document for the project site. A General Plan Amendment and Rezone would be required for approval of the project and to change the General Plan and zoning designation from Heart of the City Specific Plan to Mission 316 Specific Plan.

7. **Description of Project:** Please see Section II for project description.

8. **Surrounding Land Uses and Setting:** The project site is bounded on the west and east by undeveloped land, on the north by existing residential and disturbed open space, and on the south by Mission Road. Further west is Twin Oaks Valley Road, and residential development lies further north and east of the project site. Light commercial uses are also located east of the project site. The City of San Marcos Civic Center, an open space area, and the NCHS San Marcos Health Center is located farther south beyond Mission Road. The project site is currently vacant with the exception of remnants of a foundation of a former residence in the northwestern corner of the site.

9. **Other Public Agencies Whose Approval is Required:** California Department of Fish and Wildlife and United States Fish and Wildlife Service

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Mitigated to Below a Level of Significance," as indicated by the checklist on the following pages. All impacts identified for the project will be mitigated to below a level of significance.

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

C. DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Garth Koller, Project Planner

Date: September 10, 2014

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. 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) Substantially degrade the existing visual character or quality of the site and its surroundings?			**X**	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			**X**	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Legacy Assessment Project and the carbon measurement methodology provided in Forest Protocols adopted by the California Air resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				**X**
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			**X**	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		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 Wildlife 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
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				**X**
ii) Strong seismic ground shaking?			**X**	
iii) Seismic-related ground failure, including liquefaction?				**X**
iv) Landslides?				**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 risks to life or property?			**X**	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				**X**
VII. GREENHOUSE GAS EMISSIONS. 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 any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?			**X**	
b) Create a significant hazard to the public or the environment through reasonable 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**

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 for people residing or working in the project area?				**X**
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				**X**
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			**X**	
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?			**X**	
b) Have a potentially significant adverse impact on groundwater quality or cause or contribute to an exceedance of applicable groundwater receiving water quality objectives or degradation of beneficial uses?			**X**	
c) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				**X**
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site (e.g., downstream)?			**X**	
e) Create a significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes?			**X**	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			**X**	
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			**X**	
h) Result in increased impervious surfaces and associated increased runoff?			**X**	
i) Result in significant alteration of receiving water quality during or following construction?			**X**	
j) Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).			**X**	
k) Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?			**X**	
l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?			**X**	
m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?			**X**	
n) Otherwise substantially degrade water quality?			**X**	
o) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				**X**
p) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				**X**
q) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				**X**
r) Inundation by seiche, tsunami, or mudflow?				**X**

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				**X**
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			**X**	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				**X**
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a 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**
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		**X**		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			**X**	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			**X**	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		**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 expose people residing or working in the project area to excessive noise levels?				**X**
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				**X**
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?				**X**
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				**X**

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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:				
a) Fire protection?			**X**	
b) Police protection?			**X**	
c) Schools?			**X**	
d) Parks?			**X**	
e) Other public facilities?			**X**	
XV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?			**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**	
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			**X**	
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			**X**	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				**X**
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		**X**		**X**
e) Result in inadequate emergency access?			**X**	
f) Result in inadequate parking capacity?			**X**	
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				**X**

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			**X**	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?			**X**	
e) 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**	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			**X**	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				**X**
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		**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**		

IV. ENVIRONMENTAL ANALYSIS

This section provides an evaluation of the impact categories and questions contained in the Environmental Checklist.

I. AESTHETICS

a) Have a substantial adverse effect on a scenic vista? No Impact

The project is located in a developed portion of the City that includes a mix of developed uses including the City of San Marcos Civic Center to the southwest, a health center, a mobile home park as well as existing residential, commercial and self-storage units.

Scenic resources and vistas within the City are predominantly associated with primary and secondary ridgelines, which are identified via a Ridgeline Protection and Management Overlay Zone (ROZ). The project is located at a low elevation and flat part of the City and is not located on or near any of the protected ridgelines (Figure 4-5 of the General Plan). The project site and vicinity are not identified as a scenic vista point or area by the City. Thus the project would not result in a substantial adverse effect on a scenic vista and no impacts are identified.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway? No Impact

The project site is located approximately 0.25 miles north of State Route 78 (SR-78). A portion of SR-78 is recognized as a Scenic Highway by Caltrans; however, that portion is not in the project vicinity. The portion identified as a Scenic Highway is approximately 50 miles east of the project site near Anza Borrego (Caltrans 2014). Thus the project would not impact a State Scenic Highway.

At a local level, SR-78 is designated by the City as a view corridor. The highway corridor provides view of the Merriam Mountains, Mount Whitney, Double Peak, California State University San Marcos (CSUSM) and Palomar Community College. The proposed development would not impact views to these peaks or resources from SR-78 since it is situated at a lower elevation than these resources. Moreover, the project site is not visible from SR-78.

The City's ROZ is designed to protect natural viewsheds and unique natural resources, and to minimize physical impacts to select primary and secondary ridgelines. These protected primary and secondary ridgelines are shown on Figure 4-5 of the Conservation and Open Space Element of the City's General Plan. Development is not proposed on or near areas identified as primary or secondary ridgelines.

The project site does not support any historic buildings. The project site does contain the ruin of a residential building constructed between 1953 and 1964; however, according to the Historic Resources Survey and Evaluation Report (ASM Affiliates 2014), this structure is not historic in nature. See Section V.a, below, for additional detail on this structure. Therefore, the project would not damage any historic buildings.

In addition, the project site does not support any significant trees or rock outcroppings as identified or protected by the City's General Plan. Therefore, no impact is identified.

c) Substantially degrade the existing visual character or quality of the site and its surroundings? Less than Significant Impact

The project is located in a developed portion of the City that includes a mix of developed uses including the City of San Marcos Civic Center to the southwest, a health center, a mobile home park as well as existing residential, commercial and self-storage units.

The Mission 316 Specific Plan includes Design Guidelines that cover such items as setbacks, heights and stories, lot coverage, parking, open space, and building materials. The project proposes a residential density of 10.5 dus/acre with three story condominium buildings. The project site provides space to transition from existing industrial, commercial, and mobile home uses to the south to existing low and medium-density residential to the north.

The Specific Plan identifies a total of 21 attached condominium buildings with four different building configurations within three plan types, which will provide a varied and interesting visual architectural landscape. Each unit within the Specific Plan Area shall include a two-car garage and designated storage space. The units within the plan area were designed with a mix of bedrooms, bathrooms, and differing amenities to accommodate a range of family needs and broaden the variety of units available within the City of San Marcos. The units range from 1,400 s.f., to 1,990 s.f.

Building materials used for the proposed project will be used to create visually pleasing residential condominium dwelling units that help blend the structures with the surrounding neighborhoods and set the tone for the development of the nearby commercial and industrial uses. The attached multi-family condominium units shall be constructed using standard wood framed construction. Roofing materials will consist of concrete shake tiles, or concrete slate tiles depending on the style of units. The project will also have enhanced building materials, such as stucco exteriors of all buildings, wood trim, horizontal lap siding, decorative iron railings, decorative iron pot shelves, and wood shutters. Materials and colors will vary from structure to structure to prevent a repetitive look throughout the Specific Plan Area.

Minimum setbacks have been established to provide separation between buildings as well as create a buffer zone between neighboring developments.

The Specific Plan also includes landscaping guidelines and suggests the use of walls, fences, and monuments that create a cohesive blend of the built environment with the project as a whole while also providing privacy for residents.

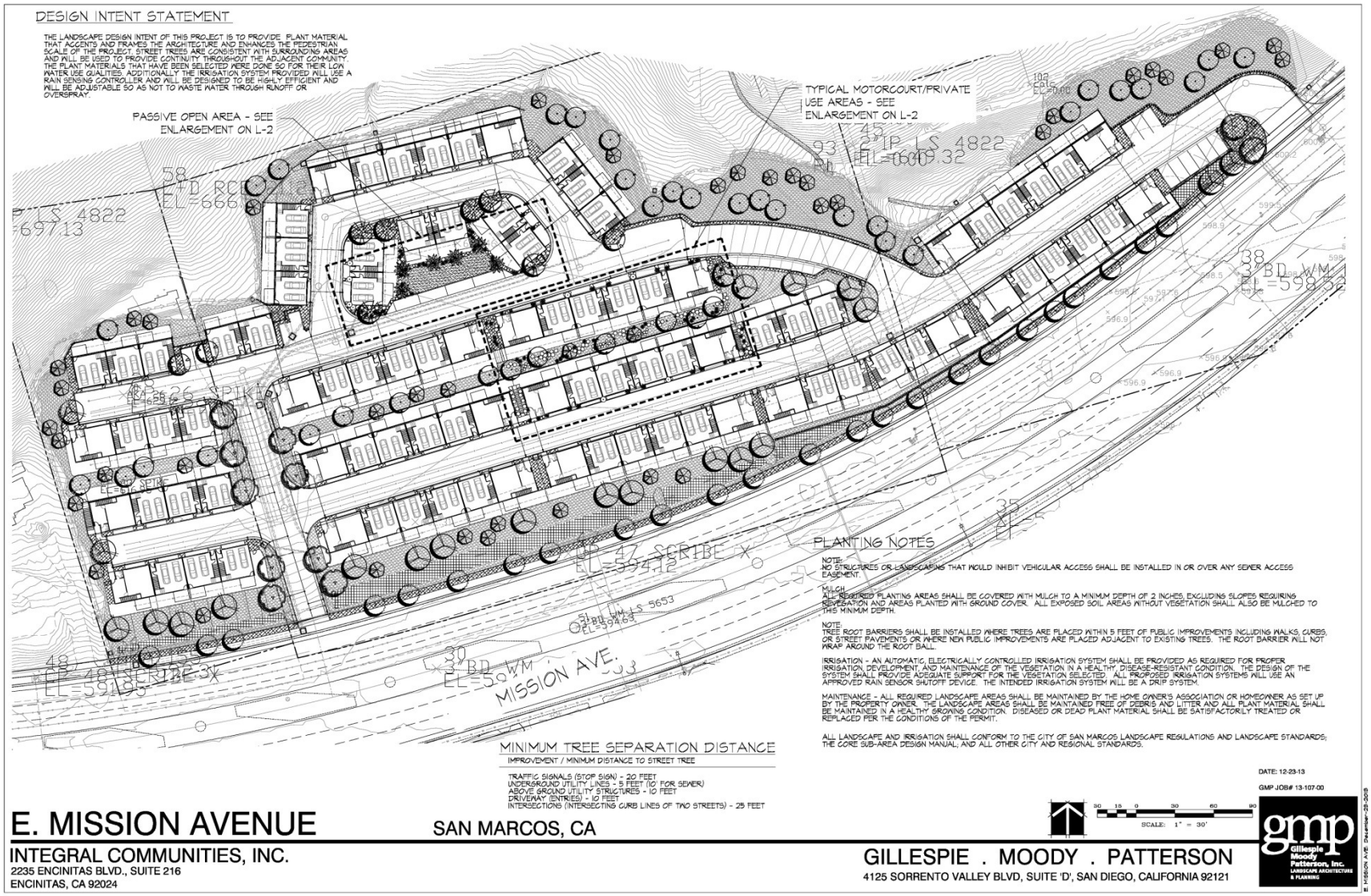
Figures 4 and 5 depict site renderings of the project from the east entry and from an aerial perspective. Architectural elevations for each building type are included in Section 3.2.2 of the Specific Plan (Appendix A of this document). **Figure 6** depicts the proposed landscape plan. Please see Section 3.3. of the Specific Plan for detailed plant palette information (Appendix A to this document).

Through implementation of the Specific Plan Design Guidelines, the project will not substantially degrade the existing visual character or quality of the site and surrounding area, and impacts are less than significant.

Figure 4. Site Rendering (East Entry)

Figure 5. Site Rendering (Mid-Block Aerial)

Figure 6. Landscape Concept Plan



d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? Less than Significant Impact

The proposed project will incorporate lighting into the project design to the extent necessary for safety and security, and to complement architectural character. A lighting plan will be prepared for the project and submitted to the Planning Department for review and approval.

Lighting requirements are guided by standards set by the City of San Marcos, which requires downward-directed low-pressure sodium vapor lighting, with the exception of specialized streetscape lighting or architectural detail lighting. The proposed project would be designed to adhere to these standards.

Proposed roofing and building finishes would not be of a kind that would result in glare. As detailed in Section 3.2.9 of the Specific Plan, roofing materials will consist of concrete shake tiles or concrete slate tiles. Building exteriors will include a light stucco finish and wood trim. Therefore, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts are less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? No Impact

The project site does not fall in an area mapped as prime farmland, unique farmland or farmland of statewide importance, as determined by the Farmland Mapping and Monitoring Program, as shown in the San Marcos General Plan (Figure 4-4, Agricultural Areas). The project site was formerly developed as with one residential structure. The nearest land designated as farmland of local importance is located over one mile from the project site across a major arterial. The nearest land designated as prime farmland is located over 1.5 miles from the project site. Therefore, the project would not result in the conversion of such lands and no impact is identified for this issue area.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? No Impact

The project site is not located within a Williamson Act contract area. According to the San Marcos General Plan EIR, no Williamson Act contracts exist within the City limits (City of San Marcos 2012). Further, the project site is not zoned for agricultural use. The project site is identified as Heart of the City Specific Plan Area (SPA) on the City's Zoning Map (City of San Marcos 2014). Under the proposed project, the site would be rezoned to Mission 316 Specific Plan Area. Therefore, no impact is identified for this issue area.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? No Impact

The proposed project is not located in an area that is zoned for forest land, timber land or for timber production. The project site is identified as Heart of the City SPA on the City's Zoning Map (City of San Marcos 2014). Under the proposed project, the site would be rezoned to Mission 316 Specific Plan Area. Therefore, no impact is identified for this issue area.

d) Result in the loss of forest land or conversion of forest land to non-forest use? No Impact

The project site does not support forests, nor is there any forest land adjacent to the project site. The project site is currently undeveloped and surrounded by lands zoned SPA and Open Space (O-S), with lands beyond Mission Road zoned Industrial 2 (I-2), Public Institutional (P-I), Mobile Home Park (R-MHP), and Residential 1 (R-1-7.5). The project is proposed adjacent to existing or proposed development within an urbanized area. Therefore, the proposed project will not result in the loss of forest land or the conversion of forest land to non-forest use. No impact is identified for this issue area.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? No Impact

The project does not 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. The project site does not support any agricultural or timber uses, nor is it adjacent to such uses. Therefore, no impact is identified for this issue area.

III. AIR QUALITY

An air quality technical report was prepared for the project by Scientific Resources Associated (2014a) and is included as **Appendix B.**

a) Conflict with or obstruct implementation of the applicable air quality plan? Less Than Significant Impact

Projects that are consistent with existing General Plan documents, which are used to develop air emissions budgets for the purpose of air quality planning and attainment demonstrations, would be consistent with the San Diego Air Basin's (SDAB) air quality plans, including the Regional Air Quality Strategy (RAQS) and the State Implementation Plan (SIP). Both of these air quality plans contain strategies for the region to attain and maintain the ambient air quality standards. Provided a project proposes the same or less development as accounted for in the General Plan document, and provided the project is in compliance with applicable Rules and Regulations adopted by the San Diego Air Pollution Control District (SDAPCD) through their air quality planning process, the project would not conflict with or obstruct implementation of the RAQS or SIP.

The project involves construction of 95 multi-family residential units across 21 attached condominium buildings. The project involves a change from Heart of the City Specific Plan to Mission 316 Specific Plan. Under the Heart of the City Specific Plan the site is identified as having a commercial use. Under the Mission 316 Specific Plan, the site would be for residential. While the project is inconsistent with the General Plan, the proposed residential uses would generate fewer trips compared to a commercial use and vehicular air emissions would be less under the project. A commercial use would generate two to three times more vehicle trips per day. Therefore, the project does not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? Less Than Significant Impact

Table 2 shows the state and federal attainment status for criteria pollutants in the SDAB. As shown in Table 2, the SDAB is a non-attainment area for the state and federal eight-hour O_3 standards, and for the state one-hour O_3, PM_{10}, and $PM_{2.5}$ standards.

Table 2. Attainment Status of Criteria Pollutants in San Diego Air Basin

Criteria Pollutant	Federal Designation	State Designation
Ozone (one hour)	Attainment (1)	Non-attainment
Ozone (eight hour)	Non-attainment	Non-attainment
Carbon monoxide	Attainment	Attainment
PM_{10}	Unclassified (2)	Non-attainment
$PM_{2.5}$	Attainment	Non-attainment
Nitrogen dioxide	Attainment	Attainment
Sulfur dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen sulfide	(no federal standard)	Unclassified
Visibility	(no federal standard)	Unclassified

Source: San Diego Air Pollution Control District. January 2010. http://www.sdapcd.org/info/facts/attain.pdf

(1) The federal 1-hour standard of 12 pphm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

(2) At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassified.

To determine whether a project would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, project emissions may be evaluated based on the quantitative emission thresholds established by the SDAPCD.

As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 for the preparation of Air Quality Impact Assessments (AQIA). For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality. Since SDAPCD does not have AQIA thresholds for emissions of VOCs, the use of the threshold for VOCs from the City of San Diego's Significance Thresholds (City of San Diego 2011) is appropriate. The screening thresholds are presented in **Table 3**.

Construction Emissions

Construction activities, including soil disturbance dust emissions and combustion pollutants from on-site construction equipment and from off-site trucks hauling dirt, cement or building materials, will create a temporary addition of pollutants to the local airshed.

Table 3. Screening-Level Criteria for Air Quality Impacts

Pollutant	Total Emissions		
Construction Emissions	**Lb. per Day**		
Respirable Particulate Matter (PM_{10})	100		
Fine Particulate Matter ($PM_{2.5}$)	100		
Oxides of Nitrogen (NOx)	250		
Oxides of Sulfur (SOx)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	137		
Operational Emissions	**Lb. Per Hour**	**Lb. per Day**	**Tons per Year**
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	100	15
Oxides of Nitrogen (NOx)	25	250	40
Oxides of Sulfur (SOx)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15

Source: Scientific Resources Associated 2014a

Table 4 presents the model results for the construction of the project. Construction projects within the City are required to implement fugitive dust control measures during grading, which includes watering the site a minimum of twice daily to control dust, as well as reducing speeds on unpaved surfaces to 15 mph or less, replacing ground cover in disturbed areas quickly, and reducing dust during loading/unloading of dirt and other materials. Also, projects would utilize low-VOC paints that would not exceed 100 grams of VOC per liter for interior surface and 150 grams of VOC per liter for exterior surfaces, in accordance with the requirements of SDAPCD Rule 67.0 for architectural coatings. Thus, Table 4 presents an estimate of the maximum daily construction emissions, assuming that these construction project design features will be employed.

As shown in Table 4, maximum daily emissions of all criteria pollutants would be below the significance thresholds for each criteria pollutant. Construction emission would be less than significant.

Operational Emissions

Operational impacts associated with the proposed project would include impacts associated with vehicular traffic, as well as area sources such as energy use, consumer products use, and architectural coatings use for maintenance purposes. Emissions associated with project operations were estimated using the CalEEMod Model, based on the project's overall trip generation rate of 8 trips per dwelling unit (RBF Consulting 2014).

Table 5 provides a summary of the estimated operational emissions for the proposed project. As shown in Table 5, operational emissions for the project would be below the significance criteria for all criteria pollutants. Therefore, air quality impacts related to operational emissions would be less than significant.

Table 4. Construction Emissions – Proposed Project

Construction Project/Phase	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Grading						
Fugitive Dust – Blasting	-	-	-	-	33.09	9.93
Explosives Emissions	-	8.50	33.50	-	-	-
Fugitive Dust - Rock Crushing	-	-	-	-	2.48	0.75
Rock Crusher Generator Emissions	1.45	19.16	5.78	0.03	0.55	0.55
Fugitive Dust	-	-	-	-	4.78	2.59
Off-Road Diesel	7.21	81.55	48.03	0.07	4.02	3.70
Hauling Truck Trips	0.99	14.67	9.26	0.03	1.86	0.66
Worker Trips	0.11	0.13	1.37	0.003	0.21	0.06
Total	**9.76**	**124.01**	**97.94**	**0.13**	**46.99**	**18.24**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Utilities and Infrastructure						
Off-Road Diesel	1.00	9.98	6.30	0.01	0.64	0.59
Worker Trips	0.02	0.02	0.25	0.0005	0.04	0.01
Total	**1.02**	**10.00**	**6.55**	**0.01**	**0.68**	**0.60**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
Building Construction Off-Road Diesel	3.66	30.03	18.74	0.03	2.12	1.99
Building Construction Vendor Trips	0.12	1.09	1.21	0.002	0.08	0.04
Building Construction Worker Trips	0.26	0.31	3.36	0.007	0.56	0.15
Total	**4.04**	**31.43**	**23.31**	**0.04**	**2.76**	**2.18**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Paving						
Paving Off-Road Diesel	2.32	25.18	14.98	0.02	1.41	1.30
Paving On-Road Diesel	0.06	0.55	0.61	0.001	0.04	0.02
Paving Worker Trips	0.06	0.07	0.74	0.002	0.12	0.03
Total	**2.44**	**25.80**	**16.33**	**0.02**	**1.57**	**1.35**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coatings Use						
Architectural Coating Offgassing	4.17	-	-	-	-	-
Off-Road Diesel	0.37	2.37	1.88	0.003	0.20	0.20
Architectural Coatings Worker Trips	0.05	0.06	0.63	0.001	0.12	0.03
Total	**4.59**	**2.43**	**2.51**	**0.00**	**0.32**	**0.23**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Simultaneous Construction Emissions	**8.30**	**96.34**	**58.66**	**0.10**	**10.87**	**7.00**
Significance Threshold	137	250	550	250	100	100
Above Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Table 5. Operational Emissions – Proposed Project

	VOC	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Summer Day, Lbs/day						
Area Sources	5.25	0.09	7.90	0.00	0.17	0.17
Energy Use	0.03	0.29	0.12	0.00	0.02	0.02
Vehicular Emissions	2.45	5.18	24.21	0.06	4.20	1.17
TOTAL	**7.73**	**5.56**	**32.23**	**0.06**	**4.40**	**1.36**
Significance Screening Criteria	137	250	550	250	100	55
Above Screening Criteria?	*No*	*No*	*No*	*No*	*No*	*No*
Winter Day, Lbs/day						
Area Sources	5.25	0.09	7.90	0.00	0.17	0.17
Energy Use	0.03	0.29	0.12	0.00	0.02	0.02
Vehicular Emissions	2.60	5.50	25.59	0.06	4.20	1.17
TOTAL	**7.89**	**5.88**	**33.62**	**0.06**	**4.40**	**1.36**
Significance Screening Criteria	137	250	550	250	100	55
Above Screening Criteria?	*No*	*No*	*No*	*No*	*No*	*No*

CO Hot Spot Analysis

Projects that involve traffic impacts may have the potential for CO "hot spots" to occur (i.e., high concentrations of CO at intersections). The Traffic Impact Analysis Report (RBF Consulting 2014) indicated that project-related traffic would not result in a significant degradation in level of service or significant delay at any of the intersections within the study area. Therefore, no exceedances of the CO standard are predicted, and the project would not cause or contribute to a violation of this air quality standard.

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? Less Than Significant Impact

The SDAB is a non-attainment area for the state and federal eight-hour O_3 standards, and for the state one-hour O_3 standard and PM_{10} and $PM_{2.5}$ standards. Evaluating whether the project could result in a cumulatively considerable impact on air quality relies on both the project's consistency with the RAQS and SIP, which address attainment of the O_3 standards, and the potential for the project to result in a cumulatively considerable impact due to particulate emissions.

As part of the RAQS and SIP planning process, the SDAPCD develops an emission inventory, based on projections from the San Diego Association of Governments (SANDAG), of growth in the region as well as on information maintained by the SDAPCD on stationary source emissions within the SDAB. The SDAPCD then uses the emission inventory to conduct airshed modeling, which provides a demonstration that the SDAB will attain and maintain the O_3 standards. Provided a project's emissions are consistent with the projections within the RAQS and SIP, the project would not result in a cumulatively considerable impact on O_3 within the SDAB.

With regard to emissions of O_3 precursors NOx and VOCs during construction, the SIP includes emissions associated with construction in its emissions budget and therefore within its attainment demonstration. The O_3 precursor emissions associated with project construction are well below the screening level thresholds and are well within the construction emissions budget contained in the SIP, which includes a demonstration that the SDAB will attain and maintain the O_3 standards. Thus because the project will be consistent with the SIP and therefore consistent with the attainment demonstration for O_3 contained within the SIP, the project would not result in a cumulatively considerable impact that would cause or contribute to a violation of the O_3 standard.

Because the project would result in emissions below the significance thresholds for all nonattainment pollutants, the project would not result in additional emissions of O_3 precursors above that projected in the attainment demonstration for O_3. The project will therefore not result in a cumulatively considerable impact on O_3 levels within the SDAB.

No simultaneous major construction projects are anticipated within 100 meters of the project site. Furthermore, particulate emissions for both construction and operations are below the significance thresholds. Therefore, no cumulatively considerable PM_{10} impact would result from construction or operation of the project.

d) Expose sensitive receptors to substantial pollutant concentrations? Less Than Significant Impact

Toxic Air Contaminants

Sensitive receptors are defined as schools, hospitals, resident care facilities, or day-care centers, as well as residential receptors in the project vicinity. The threshold concerns whether the project could expose sensitive receptors to substantial pollutant concentrations, either of criteria pollutants, or of toxic air contaminants (TACs).

If a project has the potential to result in emissions of any TACs which result in a cancer risk of greater than 10 in 1 million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. According to the CARB Air Quality and Land Use Handbook, residential uses are not land uses that would emit substantial amounts of toxic air contaminants (CARB 2005). The truck traffic that would be associated with the construction activities would be confined to on-site trips to redistribute excavated material and minor on-road trips to deliver construction materials. Additionally, there are no surrounding land uses that are anticipated to generate TACs. TAC impacts would be less than significant.

e) Create objectionable odors affecting a substantial number of people? Less Than Significant Impact

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction. Odors are highest near the source and would quickly dissipate off-site; any odors associated with construction would be temporary. Due to the temporary nature of construction odors and the anticipated dissipation of odors off-site, impacts during construction would be less than significant.

The project is a residential development and would not include land uses that would be sources of nuisance odors. Thus the potential for odor impacts associated with the project is less than significant.

IV. BIOLOGICAL RESOURCES

A biological assessment report and addendum were prepared for the project by Advantage Environmental Consultants, LLC. These document are included as **Appendices C1 and C2.**

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? Less than Significant With Mitigation Incorporated

Sensitive species are defined here as species of rare, threatened, or endangered status, or depleted or declining species according to the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Native Plant Society (CNPS), the California Natural Diversity Database (CNDDB) record for the Rancho San Marcos 7.5 minute quadrangle, or wildlife species and plant communities specifically designated as covered or narrow endemic species or sensitive habitats under the draft Natural Community Conservation Plan (NCCP) for the City of San Marcos. Habitat that supports a listed species or a narrow endemic species is also a sensitive biological resource.

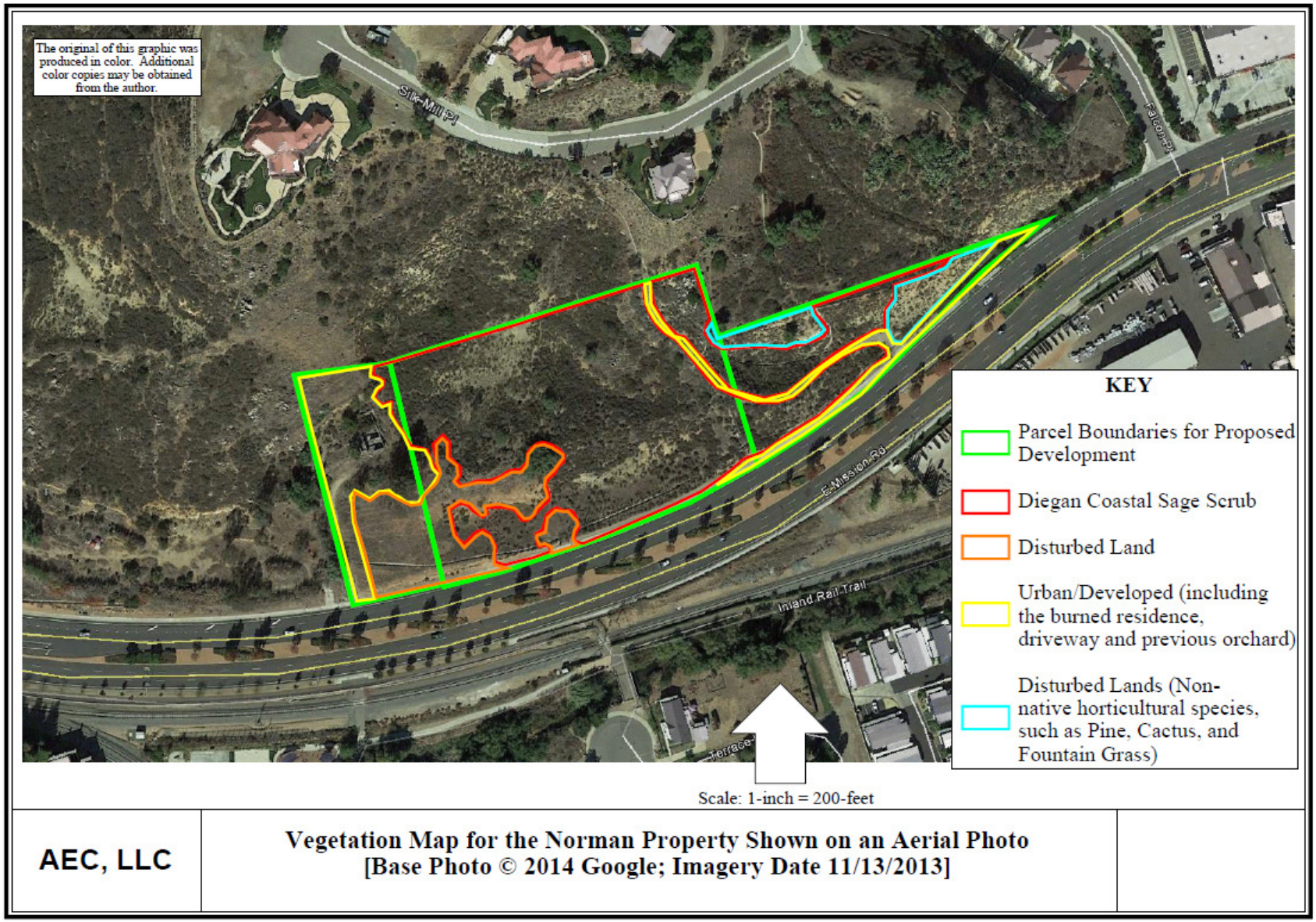
State and federal agencies regulate sensitive species and require an assessment of their presence or potential presence to be conducted on-site prior to approval of any proposed development on a property. General biological surveys as well as endemic, rare plant, and animal presence/absence and/or potential surveys were conducted to map the vegetation communities on the project site and to assess the presence or potential for presence of sensitive wildlife and vegetation communities. A complete list of all plant and wildlife species observed on-site is included as an attachment to Appendix C.

Habitat acreages on the project site are summarized in **Table 6a** and presented in **Figure 7**. Table 6a also summarizes the habitat types in the proposed off-site fuel modification zones B and C. The project site supports Diegan coastal sage scrub, ~~ruderal vegetation,~~ a variety of disturbed lands, and urban/developed lands. Of these vegetation communities, Diegan coastal sage scrub is considered a sensitive vegetation community. No sensitive plants were identified on-site.

~~Table 6. Biological Resources On-Site (Current Legal Parcels)~~

~~Habitat Type~~	~~Total (acres)~~
~~Diegan Coastal Sage Scrub (Tier II)~~	~~3.8~~
~~Ruderal Vegetation (Tier IV)~~	~~0.9~~
~~Urban/Developed (Tier IV)~~	~~4.27~~
~~Disturbed (Tier IV)~~	~~0.3~~
~~**Total**~~	~~**9.27**~~

Figure 7. Vegetation Map



~~As described in Section II.A, above, a boundary line adjustment will reduce the project size by 0.29, which includes 0.09 acre of Diegan coastal sage scrub. County of San Diego Fire Code Section 4907.2.1 allows up to 20 feet of vegetation clearing along driveways and public and private roadways. Taking into account 20 lateral feet of clearing along Mission Road, impacts to approximately 0.11 acre of Diegan coastal sage scrub will not require mitigation. Three localized areas of Diegan coastal sage scrub totaling 0.1 acre will not be impacted by the proposed development. Approximately 0.11 acres of Diegan coastal sage scrub will be impacted by required fuel modification. Offsite improvement associated with sewer line connections would occur within the existing Mission Road right-of-way and would not result in habitat impacts. Therefore,~~

Table 6a. Habitat Types (Onsite and within Fuel Modification Zones B and C)

Habitat Type	Onsite (Acres)	Offsite (Acres) (1)	Total
Diegan Coastal Sage Scrub (Tier II)	3.7	0.11	3.81
Urban/Developed (Tier IV)	4.1	0.43	4.53
Disturbed (Tier IV)	1.2	0.04	1.24
Total	**9.0**	**0.58**	**9.58**

(1) Offsite areas within Fuel Modification Zones B and C

Table 6b summarizes the impacts, but habitat type for the onsite development as well as the proposed fuel modification in Zones B and C.

Table 6b. Habitat Impacts from Development and Fuel Modification Zones B and C

Habitat Type	Development Impacts (Acres)	Fuel Modification Impacts (Acres)	Total
Diegan Coastal Sage Scrub (Tier II)	3.7	0.11	3.81
Urban/Developed (Tier IV)	4.1	0.43	4.53
Disturbed (Tier IV)	1.2	0.04	1.24
Total	**9.0**	**0.58**	**9.58**

As shown in Table 6b, the project will impact a total of 3.81 acres of Diegan coastal sage scrub (3.7 acres for development and 0.11 acres for fuel modification), 4.53 acres of urban/developed area (4.1 acres for development and 0.43 acres for fuel modification), and 1.24 acres of disturbed areas (1.2 acres for development and 0.04 acres for fuel modification). Impacts to urban/developed and disturbed habitats are not considered significant. The impact to Diegan coastal sage scrub is considered significant (**Impact BIO-1)** and mitigation is required. The following mitigation measure is required as a condition of project approval and would reduce the impact to below a level of significance.

MM-BIO-1 Permanent impacts to 3.81 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.81 acres of Tier II habitat shall be mitigated through either preservation in the City of San Marcos, a purchase of credits from an approved mitigation bank, or a combination thereof, as approved by the Planning Director.

~~Implementation of the proposed project would permanently impact 3.61 acres of Diegan coastal sage scrub on the site (**Impact BIO-1**). The following mitigation measure is required to reduce impacts to below a level of significance.~~

~~**MM-BIO-1** Permanent impacts to 3.61 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.61 acres of Tier II habitat shall be preserved through on-site preservation, a purchase of credits from an approved mitigation bank, or a combination thereof as approved by the Planning Director.~~

Given the occurrence of Diegan coastal sage scrub on the project site, a federal protocol presence/absence survey for the California gnatcatcher was conducted. No California gnatcatchers were found on the property during any of the six site visits comprising the federal protocol.

One sensitive wildlife species, the orange-throated whiptail, was observed on the project site during the California gnatcatcher survey. Implementation of the proposed project would impact this small population of orange-throated whiptail, requiring mitigation. Mitigation for this species is handled through mitigation for the habitat in which is occurs. No species-specific mitigation is required. Accordingly, implementation of MM-BIO-1 will also reduce impacts to orange-throated whiptail to below a level of significance.

The project site could support sensitive nesting birds. While no active nests were observed, implementation of the proposed project, removal of on-site trees, and removal of trees from the median of Mission Road as required by the traffic mitigation, could impact nesting birds, which are protected under the Migratory Bird Treaty Act. Additionally, construction noise could also impact nesting birds. This represents a potentially significant impact (**Impact BIO-2 and Impact BIO-3**). Mitigation is required to reduce these impacts to below a level of significance.

MM-BIO-2 If grading is scheduled to occur during the raptor breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist for active nests shall be completed prior to construction activities or tree removal. If active nests are identified, additional mitigation in conformance with the City's Biology Guidelines shall be implemented to the satisfaction of the City and wildlife agencies (i.e., appropriate buffers, monitoring schedules, etc.). Within three months following the completion of any required monitoring, two copies of the Final Biological Monitoring Report and/or evaluation report which describes the results, analysis, and conclusions of the Biological Monitoring Program shall be submitted to the City and wildlife agencies. The report shall address findings of active/inactive nests and any recommendations for retention of active nests, removal of inactive nests, and mitigation for offsetting loss of breeding habitat.

MM-BIO-3 During the avian breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist shall occur prior to issuance of grading permits or removal of trees. If active nests are identified, construction activities shall adhere to appropriate noise buffer zone restrictions. The buffer shall be maintained until the qualified biologist determines that any young birds have fledged. Written results of such surveys shall be submitted to and be approved by City staff and wildlife agencies.

With the incorporation of MM-BIO-1 through MM-BIO-3, the project will not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. Impacts would be mitigated to below a level of significance.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? Less than Significant With Mitigation Incorporated

Based upon the biological assessment report prepared for the project, there are no riparian habitats located on the project site (AEC 2014a). Therefore, the project will not have a substantial adverse effect on any riparian habitat.

On-site Diegan coastal sage scrub communities and impacts to this sensitive natural community are described above in response to criteria IV(a). As described above, implementation of MM-BIO-1 is required to reduce impacts to this sensitive natural community to below a level of significance. With the incorporation of this mitigation measure, the project will not have a substantial adverse effect on any sensitive natural community.

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? No Impact

No definable wetlands were identified within the project boundary. No springs, seeps, or other water sources were located during the course of the biological survey. According to the biological assessment report, no vernal pools have been mapped on the property (AEC 2014a). Therefore, implementation of the proposed project would not have a substantial adverse effect on federally protected wetlands. No impact is identified.

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? No Impact

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, and areas with vegetation cover provide corridors for wildlife travel.

The project site is a habitat island, with Twin Oaks Valley Road farther west of the site, Mission Road south of the site, and residential development north and east of the site blocking any wildlife movement. Furthermore, the project site and vicinity is not identified as being within a Wildlife Corridor per Figure 4-2 of the City of San Marcos General Plan. Therefore, the project will not 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 site and no impact is identified.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact

The Conservation and Open Space Element of the City's General Plan includes policies related to the protection of biological resources. The applicable policies, as well as the project's consistency with these policies, are presented below:

Policy COS-1.1: Support the protection of biological resources through the establishment, restoration, and conservation of high quality habitat areas.

With the exception of on-site populations of Diegan coastal sage scrub, the majority of the projet site would not be characterized as a high quality habitat area. Mitigation for impacts to Diegan coastal sage scrub is identified above in response to criteria IV(a). Therefore, implementation of the project does not conflict with this policy.

Policy COS-1.2: Ensure that new development, including Capital Improvement Projects, maintain the biotic habitat value of riparian areas, oak woodlands, habitat linkages, and other sensitive habitats.

The project site does not support any riparian areas, oak woodlands, or habitat linkages. On-site populations of Diegan coastal sage scrub are considered sensitive, and impacts to this habitat is provided in response to criteria IV(a), above. Therefore, the project does not conflict with this policy.

In conclusion, the project would not conflict with local policies protecting biological resources and no impact is identified for this issue area.

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? No Impact

The project site is located within the Multiple Habitat Conservation Program (MHCP), a comprehensive, multi-jurisdictional habitat conservation plan approved in 2003 for northwestern San Diego County; however, the project site is located outside of the Multiple Habitat Planning Area (MHPA) San Marcos Subarea Plan (SAP) Focus Planning Area (FPA). The City's SAP designates a natural habitat preserve system and provides a regulatory framework for determining impacts and designating mitigation associated with proposed development. Because the SAP has not yet been formally approved and adopted, all projects are required to obtain applicable permits for impacts to listed species under Section 4D, 10(a) or Section 7 of the federal Endangered Species Act. Furthermore, because the project site lies outside of the FPA, implementation of the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. No impact is identified for this issue area.

V. CULTURAL RESOURCES

An Historic Resources Survey and Evaluation Report was prepared for the project by ASM Affiliates (2014) and is included in **Appendix D**.

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? Less Than Significant Impact

An historic resources survey and evaluation report has been prepared for the project site by ASM Affiliates (July 2014) and is included in Appendix D. The report presents the results of a cultural and historical resources inventory conducted within the Area of Potential Effect (APE) for the proposed project. Site records on file at the South Coastal Information Center (SCIC), San Diego State University, indicate 32 previous archaeological surveys have been conducted within a half-mile search radius of the proposed project. One survey intersected a portion of the project site.

One historic address has been previously recorded within a half-mile of the project area. The San Marcos Fire Station Gas & Oil House (P-37-014081), constructed in 1939, was recommended for listing on the National Register of Historic Places. This site is located outside of the proposed project area. No historic resources have been previously recorded within the project site.

One new resource was identified and recorded during the project site survey. The ruin of a residential building constructed between 1953 and 1964 was located within the central upper terrace portion of the project site.

The California Register of Historical Resources (CRHR) program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; and affords certain protections under CEQA.

The ruin is not known to be associated with any significant events or persons and cannot be linked with any important historical trend within the historical context of the City of San Marcos, the State of California, or the United States. Therefore, this resource is not eligible for listing as an architectural resource on the CRHR; however, this site is considered an archaeological site. Any potential for eligibility lies in the research potential of any subsurface archaeological deposits associated with the buildings.

To determine the research potential, four trenches approximately two and a half feet wide and three and a half to four feet deep were dug adjacent to the structure. Subsurface tests were conducted in May 2014 to determine the subsurface potential for intact buried historical deposits. No cultural deposits or isolated resources were encountered during the trenching. Surficial examination and trowel probing of the remainder of the site did not identify any historical deposits.

According to the report, this site does not meet the eligibility criteria and is therefore not recommended for listing on the CRHR. Therefore, this site does not qualify as an historical resource. Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Impacts would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? Less Than Significant with Mitigation Incorporated

Based upon the cultural resources report prepared for the project (ASM Affiliates, 2014), no archeological resources are known to occur on the project site. ASM's research included a records research and site reconnaissance.

As described above, site records on file at the SCIC indicated 32 previous archaeological surveys have been conducted within a half-mile radius of the proposed project, one of which intersected a portion of the project site. Of the 32 previous surveys, ten previously recorded sites containing 12 resources were identified within a half-mile radius of the project site, including six lithic scatters, habitation debris, a homestead, a bungalow, the fire station identified above, and an isolate mano. Each of these resources is located outside of the proposed project area. None of the previous surveys identified or recorded archaeological resources within the current project boundary.

The pedestrian survey conducted by ASM identified one resource of potential archaeological significance; however, as described above, this resource does not provide research potential as no subsurface archaeological deposits associated with the building were identified during on-site trenching. No additional archaeological resources were identified on the site. Additionally, a Sacred Lands File Search was conducted by the Native American Heritage Commission (NAHC) and did not identify any sacred sites in the project area**.**

Native American Letters and SB-18 Consultation

The City of San Marcos sent letters to local Tribes in February 2014 as part of the SB-18 consultation process. Rose Duro, the Rincon Cultural Committee Chairman, responded on March 13, 2014, that the Rincon Band of Luiseño Indians would like to remain informed of any and all updates and changes to the project. Tuba Ebru Ozdil, Planning Specialist from the Pechanga Cultural Resources Department, responded on May 8, 2014 that the tribe has not received sufficient information to engage in meaningful consultation. As such, the tribe invokes its right to consult with the City of San Marcos and requests notification and involvement in the CEQA process, receipt of all environmental review documents including archaeological reports, and notification of all public hearings and scheduled project approvals. Merri Lopez-Keifer, Tribal Counsel for the San Luis Rey Band of Mission Indians, responded on March 13, 2014, that the tribe has concerns regarding this project and will review the necessary environmental review documents for the project in order to provide formal comments to the City of San Marcos.

The City met with a representative from the Pechanga Cultural Resources Department on August 28, 2014 to discuss the project. Following that meeting, Anna Hoover with the Pechanga Cultural Resources Department submitted a letter on August 29, 2014 indicating eight cultural resources mitigation measures that the Tribe would like included in the environmental document. Those measures have been included as MM-CR-1 through MM-CR-8 and implementation of these mitigation measures will be required as a condition of project approval.

While no archaeological resources were identified on the project site, the potential remains for unidentified resources to exist on the project site (**Impact CR-1**). Incorporation of mitigation measures **MM-CR-1 through MM-CR-8** will prevent accidental disturbance of any intact cultural deposits that were not identified on the project site, and shall be required as a condition of project approval to reduce potential impacts to below a level of significance.

MM-CR-1 A qualified archeological monitor and a Luiseño Native American monitor shall be present during all earth moving and grading activities to assure that any potential cultural resources, including tribal, found during project grading be protected.

MM CR-2 Prior to beginning project construction, the Project Applicant shall retain a San Diego County qualified archaeological monitor to monitor all ground-disturbing

activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to cultural resources evaluation, which shall include archaeological documentation, analysis and report generation and take into account tribal customers and traditions.

MM-CR-3 At least 30 days prior to beginning project construction, the Project Applicant shall enter into a Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a Luiseño Tribe. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site.

MM-CR-4 Prior to beginning project construction, the Project Archaeologist shall file a pre-grading report with the City to document the proposed methodology for grading activity observation, which will be determined in consultation with the contracted Luiseño Tribe referenced in MM-CR-3. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in MM-CR-3, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation the Luiseño Native American monitor in order to evaluate the significance of any archaeological resources discovered on the property. Tribal and archaeological monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities, and shall also have the authority to stop and redirect grading activities.

MM-CR-5 The landowner shall relinquish ownership of all cultural resources collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site to the appropriate Tribe for proper treatment and disposition per the Cultural Resources Treatment and Monitoring Agreement referenced in MM-CR-3. All cultural materials that are deemed by the Tribe to be associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

In the event that curation of cultural resources is required, curation shall be conducted by an approved facility and the curation shall be guided by California State Historic Resource Commissions Guidelines for the Curation of Archaeological Collections. The City of San Marcos shall provide the developer final curation language and guidance on the project grading plans prior to issuance of the grading permit, if applicable, during project construction.

MM-CR-6 All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.

MM-CR-7 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California

Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Suspected Native American remains shall be examined in the field and kept in a secure location at the site. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. The NAHC must then immediately notify the "most likely descendant(s)" of the discovery. The most likely descendants(s) shall then make recommendations within 48 hours, and engage in consultation concerning treatment of remains as provided in Public Resources Code 5097.98.

MM-CR-8 If inadvertent discoveries of subsurface archaeological/cultural resources, not included human remains or associated burial goods which is addressed in MM-CR-7, are discovered during grading, the Developer, the project archaeologist, and the Luiseño Tribe under agreement with the landowner described in MM-CR-3 shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological resources. If the Developer, the project archaeologist and the Tribe cannot agree on the significance of mitigation for such resources, these issues will be presented to the Planning Director for decision. The Planning Director shall make a determination based upon the provisions of the California Environmental Quality Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Tribe. Notwithstanding any other rights available under law, the decision of the Planning Director shall be appealable to the Planning Commission and/or City Council.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less Than Significant Impact

The project site does not support any unique geologic features. The on-site pedestrian survey and subsurface testing did not identify any buried resources. Moreover, the project site is located in an area geologically mapped to be underlain by Cretaceous age crystalline bedrock. Due to the limited availability of fossil-producing geologic formations, impacts are considered less than significant.

d) Disturb any human remains, including those interred outside of formal cemeteries? Less Than Significant With Mitigation Incorporated

The cultural resource assessment prepared by ASM Affiliates (2014) did not indicate the likelihood of human remains on the site. Additionally, existing regulations through California Health and Safety Code Section 7050.5 state that if human remains are discovered during project construction, no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The Most Likely Descendant shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98. These regulations are also referenced in **MM-CR-7**. So, while the cultural resources assessment concluded that there is no evidence of human remains on the project site, a Native American monitor shall be

present during the earth moving grading activities to assure that any resources found during project grading would be protected as directed by the MLD (**MM-CR-1**). Therefore, impacts are less than significant with incorporation of mitigation measure MM-CR-1 and MM-CR-7.

VI. GEOLOGY AND SOILS

A geotechnical evaluation was prepared for the project site by GeoTek (2013) and is included as **Appendix E** of this document.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. No Impact

The project site is located within a seismically active region, as is all of southern California. However, the project site is not adjacent to any known active faults. The project site is not located on a fault, as delineated by the most recent Alquist-Priolo Earthquake Fault Zoning Map (CDC 2012a). The closest faults are the Rose Canyon Fault (12 miles southwest of the project), the Elsinore Fault (20 miles to the northeast), and the Coronado Banks fault (27 miles to the southwest). Therefore, no impact is identified for this issue area.

ii) Strong seismic ground shaking? Less Than Significant Impact

The proposed project is located in seismically active southern California and is considered likely to be subjected to strong ground motion from regional seismic activity. As identified in Section VI.a.i, the nearest identified potentially active fault is located approximately 12 miles from the project area. All structures on the site would be designed in accordance with seismic parameters of the current California Building Code (2013). Therefore, the impact for this issue area would be considered less than significant.

iii) Seismic-related ground failure, including liquefaction? No Impact

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other rapid loading. Liquefaction and related phenomena have been responsible for substantial structural damage in historical earthquakes, and are a design concern under certain conditions.

Liquefaction occurs in saturated soils, in which the space between individual particles is completely filled with water. This pore water exerts a pressure on the soil particle that influences how tightly the particles themselves are pressed together.

Prior to an earthquake, pore water pressure is typically low; however, earthquake motion can cause the pore water pressure to increase to the point where the soil particles can readily move with respect to each other. When liquefaction occurs, the strength of the soil decreases and the ability of a soil deposit to support structural loads are reduced.

Due to the relatively shallow bedrock and absence of shallow groundwater at the project site, the liquefaction potential and seismic settlement potential on this site is considered negligible (GeoTek 2013). Therefore, no impact is identified.

iv) Landslides? No Impact

The project site is relatively flat and is located in a flat part of the city. Evidence of ancient landslides or slope instabilities at the project site was not observed during the geotechnical investigation (GeoTek 2013). Thus there is not a potential for the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact is identified for this issue area.

b) Result in substantial soil erosion or the loss of topsoil? No Impact

The project site is currently undeveloped. After development, the project site will support residential uses. Due to the fact that the site will be graded to be generally flat and the project will not leave exposed areas of bare soil, the project will not result in substantial soil erosion or loss of topsoil and no impact is identified.

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? Less than Significant Impact

The project site is located in an area geologically mapped to be underlain mostly by Cretaceous age tonalite bedrock. The project site area is locally underlain by undocumented fill materials, colluvium, and Cretaceous age crystalline bedrock. Undocumented fill soils were locally observed to be scattered across the site. Thicker zones of fill were noted in the vicinity of the former structure on the western edge of the property. The undocumented fill generally consists of gravelly silty sand with some cobble size clasts. Other unmapped areas of undocumented fill may also be present on the site.

In general, undocumented fill soils are not considered suitable for support of structural site improvements, but may be re-used as engineered fill if properly placed. Adherence to the general earthwork recommendations within the geotechnical evaluation (Appendix E) would reduce any potential concerns related to building stability on the project site.

Colluvial soils were observed to cover most of the property, with the exception of where fill and bedrock was exposed and where previous excavation activities had occurred. The colluvium is generally observed to consist of silty fine to medium sand, which is mostly medium brown and slightly porous. Based on the results of the laboratory testing performed on a sample of this material, the onsite colluvium materials indicated a very low expansion potential when tested and classified in accordance with ASTM D 4829. Compliance with the general design recommendations within the geotechnical evaluation (Appendix E) would reduce the risk from soil expansion.

Cretaceous age granitic materials were observed across the property, with outcrops and partially exposed core stones of granitic materials. Weathered granitic materials were observed in previously excavated areas.

As discussed previously, due to the relatively shallow bedrock and absence of shallow groundwater at the site, the liquefaction potential and seismic settlement potential on this site is considered negligible.

Through compliance with general design recommendations included in the geotechnical evaluation (Appendix E), the project would not be subject to or cause instability that would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts for this issue area are less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? Less Than Significant Impact

The geotechnical evaluation for the project (GeoTek 2013) concluded that the upper soils exhibit a very low expansion potential when tested and classified in accordance with ASTM D 4829. Compliance with the general design recommendations within the geotechnical evaluation (Appendix E) would reduce the risk from soil expansion. Therefore, expansion of soils on the site would not result in substantial risks to life or property and impacts are less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? No Impact

The project does not propose any septic tanks or alternative wastewater disposal systems. Therefore, no impact is identified for this issue area.

VII. GREENHOUSE GAS EMISSIONS

A greenhouse gas analysis was prepared for the project by Scientific Resources Associated (2014b). The complete report is included as **Appendix F** of this document.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less Than Significant Impact

Existing Greenhouse Gas (GHG) Emissions

GHG emissions associated with the project were estimated separately for four categories of emissions: (1) construction; (2) energy use, including electricity and natural gas usage; (3) water consumption; and (4) transportation. The analysis includes a baseline estimate assuming Title 24-compliant buildings, which is considered business as usual for the proposed project. Emissions were estimated based on emission factors from the California Climate Action Registry General Reporting Protocol (CCAP 2009). This inventory presents emissions based on "business as usual" assumptions.

Construction GHG Emissions

Construction GHG emissions include emissions from heavy construction equipment, truck traffic, and worker trips. Emissions were calculated based on the CalEEMod Model (ENVIRON 2013), adding in the emissions from the generators that would operate the rock crusher. Total GHG emissions associated with construction are estimated at 1,710 metric tons of CO_2e. To evaluate construction projects' contributions to overall annual GHG emissions, the SCAQMD recommends in their interim guidance for evaluating GHGs under CEQA (SCAQMD 2008) that the emissions be amortized over 30

years and added to operational emissions, as appropriate. Amortized over 30 years, construction would contribute 57 metric tons per year of CO_2 emissions.

Operational GHG Emissions

The Mission 316 Specific Plan proposes to construct 95 multi-family units. The project also includes parking, open space areas, and roadways. Total electricity, natural gas, and water usage rates for the residences under "business as usual" conditions were estimated as discussed in the sections below.

Energy Use Emissions. Energy use generates GHG through emissions from power plants that generate electricity as well as emissions from natural gas usage at the project itself. Business as usual electricity use was estimated based on construction of the proposed project to meet the requirements of Title 24 as of 2005. Based on the latest guidelines and baseline emission calculations for energy efficiency, "business as usual" is considered to be the equivalent of Title 24 as of 2005 because the ARB's baseline inventory and its definition of business as usual is based on compliance with Title 24 as of 2005. The ARB prepared its inventory to evaluate the required reduction from "business as usual", which is defined as the baseline with no measures implemented to reduce emissions of GHGs. For building standards, the goal of reducing emissions below business as usual within the ARB's Scoping Plan is based on Title 24 as of the ARB's inventory. Thus, the baseline used in this analysis is consistent with the ARB's analysis and goals. The use of Title 24 as of 2005 is consistent with the Scoping Plan.

Natural gas use was also estimated based on construction of the proposed project to meet the requirements of Title 24 as of 2005.

Residential electricity use was estimated based on average performance for southern California residences, according to the California Statewide Residential Appliance Saturation Survey (CEC 2010). The energy use figures in this report represent current state-wide average uses, including those that are compliant with 2005 Title 24 standards. The California Statewide Residential Appliance Saturation Survey provided estimated energy use of 4,561 kWh annually for townhomes within the state of California. In the California Statewide Residential Appliance Saturation Survey (CEC 2010), natural gas usage rates were reported as 247 therms per year.

GHG emissions were then calculated based on the emission factors in the California Climate Action Registry General Reporting Protocol (CCAP 2009) to estimate emissions of GHGs per kWh or MMBTU used per year.

Water. Water usage was estimated based on the CalEEMod Model. The model assumes that the residential development would utilize approximately 6.2 million gallons annually for indoor uses and 3.9 million gallons annually for outdoor uses. The California Energy Commission (2006) estimates that in southern California, water usage will have an embodied energy of 12,700 kWh per million gallons.

Vehicle Emissions. Based on the traffic impact analysis (RBF Consulting 2014), the estimated total number of trips for the project is 760.

Solid Waste. Solid waste generation rates were estimated based on the CalEEMod Model. The CalEEMod Model calculated a solid waste generation rate of 23.55 metric tons per year for the project. Solid waste handling GHG emissions were calculated based on the CalEEMod Model.

Operational GHG emissions under "business as usual" conditions are summarized in **Table 7.** As shown in Table 7, total CO_2e emissions would be 1,291 metric tons per year.

Table 7. Summary of Estimated Operational GHG Emission – Business as Usual Scenario

Emission Source	Annual Emissions (Metric tons/year)			
	CO_2	**CH_4**	**N_2O**	**CO_2e**
Operational Emissions				
Electricity Use Emissions	122	0.0051	0.0014	123
Natural Gas Use Emissions	125	0.0138	0.0002	125
Water Consumption Emissions	36	0.0015	0.0004	36
Solid Waste Handling	8.87	0.5242	-	23.55
Vehicle Emissions	916	0.0067	0.0384	927
Amortized Construction Emissions	57	-	-	57
Total	**1,265**	**0.5513**	**0.0404**	**1,291**
Global Warming Potential Factor	1	21	310	-
CO_2 Equivalent Emissions	1,265	15	11	1,291
TOTAL CO_2 Equivalent Emissions	**1,291**			

A significance threshold of 28.3 percent from "business as usual" levels is considered to demonstrate that a project would be consistent with the goals of AB 32. If the project can demonstrate that it would meet these goals, its greenhouse gas emissions, emitted either directly or indirectly, would not have a significant impact on the environment.

Not all of the GHG-reducing project design features identified in the project description are quantifiable due to scientific and methodological limitations regarding GHG savings. The CEC (Architectural Energy Corporation 2007) estimates that implementation of the Title 24 standards as of 2008 will result in reductions in electricity use of 19.7 percent from business as usual for multi-family residential dwellings. The CEC also estimates that implementation of the Title 24 standards as of 2008 will result in reductions in natural gas use of 7.0 percent from business as usual for multi-family residential dwellings. Implementation of Title 24 as of 2013 will reduce energy demand by an additional 15 percent for all structures.

It was anticipated that water conservation measures would be implemented for the project. The reduction in water use for both indoor and outdoor uses was calculated by the CalEEMod Model.

Implementation of the Renewable Portfolio Standards (RPS) will affect indirect GHG emissions associated with electricity use for the project because electricity will be purchased from San Diego Gas and Electric. According to the San Diego County Greenhouse Gas Inventory, implementation of the 33 percent RPS mandate, as established by SB 107, would reduce GHG emissions by 27 percent from 2005 levels; credit was taken for these GHG savings in this analysis.

Under AB 341, the state of California will increase solid waste diversion from landfills to 75% by the year 2020. It was therefore assumed that this program would be implemented and a 75% reduction in solid waste generation and GHG emissions from solid waste would be reduced by 75%.

Implementation of the new federal CAFE standards will achieve reductions that are equivalent to those proposed in AB 1493, the Pavley bill. Emissions were calculated based on the 2020 emission

factors from the EMFAC2011 model, with credit for the Pavley standards and the Low Carbon Fuel Standard.

The results of the GHG inventory for emissions with implementation of GHG reduction measures are presented in **Table 8**.

Table 8. Summary of Estimated Operational GHG Emission With GHG Reduction Measures Scenario

Emission Source	Annual Emissions (Metric tons/year)			
	CO_2	**CH_4**	**N_2O**	**CO_2e**
Operational Emissions				
Electricity Use Emissions	71	0.0030	0.0008	71
Natural Gas Use Emissions	98	0.0109	0.0002	99
Water Consumption Emissions	26	0.0011	0.0003	26
Solid Waste Handling	2.22	0.1311	-	6
Vehicle Emissions	608	0.0047	0.0269	611
Amortized Construction Emissions	57	-	-	57
Total	**862**	**0.1508**	**0.0282**	**873**
Global Warming Potential Factor	1	21	310	
CO_2 Equivalent Emissions	862	4	7	873
TOTAL CO_2 Equivalent Emissions	**873**			
Business as Usual CO_2 Equivalent Emissions	**1,291**			
Percent Reduction	**32.37%**			

As shown in Table 8, with implementation of the project design features described above, project emissions would total 873 metric tons per year and the project will meet the significance threshold by reducing operational GHG emissions by 32.4 percent from business as usual. Because the project would reduce emissions by more than the significance threshold of 28.3 percent, the project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? <u>Less Than Significant Impact</u>

The project would not conflict with implementation of the plans and programs proposed in the conservation element of the City of San Marcos General Plan, and would generate GHG emissions of approximately 1.3 metric tons per service population, which is below the level of 4.9 metric tons per service population used to evaluate impacts in the EIR for the General Plan Update. Accordingly, the project would not result in a significant impact due to GHG emissions.

VII. HAZARDS AND HAZARDOUS MATERIALS

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? Less Than Significant Impact

Hazardous materials include solids, liquids, or gaseous materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, could pose a threat to human health or the environment. Hazards include the risks associated with potential explosions, fires, or release of hazardous substances in the event of an accident or natural disaster, which may cause or contribute to an increase in mortality or serious illness, or pose substantial harm to human health or the environment.

The proposed project would involve the transport of fuels, lubricants, and various other liquids needed for operation of construction equipment at the site and would be transported to the construction site on an as-needed basis by equipment service trucks. In addition, workers would commute to the project site via private vehicles, and would operate construction vehicles/ equipment on both public and private streets. Materials hazardous to humans, wildlife, and sensitive environments would also be present during project construction. These materials include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets. The potential exists for direct impacts to human health and biological resources from accidental spills of small amounts of hazardous materials from construction equipment during construction; however, the proposed project would be required to comply with Federal, State, and City Municipal Code regulations which regulate and control those materials handled on-site. Compliance with these restrictions and laws ensures that potentially significant impacts would not occur. Therefore, a less than significant impact is identified.

b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Less Than Significant Impact

The only hazardous materials anticipated for transport or disposal associated with the project are routinely used household products such as cleaners, paint, solvents, motor oil/automotive products, batteries and garden maintenance products. The use, handling and disposal of these products are addressed by household hazardous waste programs that are part of the Integrated Waste Management Plan of the County of San Diego. Impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? No Impact

The project site is located approximately 0.4 mile east of the North County Regional Education Center, and half a mile from both the Mission Hills Church Preschool and San Marcos Elementary School. The project does not propose any uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. The project is a residential development and such development would not be characterized as emitting or handling hazardous materials. Therefore, no impact is identified for this issue area.

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? Less Than Significant Impact

A Phase 1 Environmental Site Assessment was prepared for the site by Advanced Environmental Consultant (AEC) in 2012. The complete report is included as **Appendix G**. The assessment included a detailed record and database search as well as a site visit. The project site was not listed on any of the databases searched as part of the assessment. One property mapped within 1/8 mile of the site. The Teledyne Metal Forming site at 528 Mission Road is located approximately 0.06 miles northeast of the project site. This is a small quantity generator with no reported violations and AEC concluded that this location would not be of concern to the project site.

During the site visit, pad-mounted electrical transformers were observed along the southeastern portion of the project site along East Mission Road. There was no evidence of a release in the vicinity of the transformers. Household trash and debris were observed within and adjacent to the abandoned buildings on the site. No staining or suspect conditions were identified or associated with this debris.

Based upon historical aerial photographs, agricultural activity took place on the site in the past. AEC collection four surficial soil samples from approximately six to 12 inches below existing grades in four areas of former agricultural activity on the site. The soil samples were analyzed for organichlorine pesticides (OCPs) uses USEPA Test Method 8081A. OCPs were not detected at or above laboratory reporting limits in the soil samples.

EnviroStor Database Search

The California Department of Toxic Substances Control maintains an online database, EnviroStor, that allows for search of permitted facilities and environmental cleanup activities on a specific location. A review of EnviroStor in July 2014 did not reveal any cleanup sites, permitted sites, or other related sites on the project site. A total of nine leaking underground storage tank cleanup sites, and cleanup program sites were located within approximately one-half mile of the project site. More detail on each of these listing and the current status is provided below:

Location	Description	Status
Hollandia Dairy 622 E. Mission Road San Marcos	Leaking Underground Storage Tank Cleanup Site	Completed – Case Closed
7-Eleven Food Store #18977 578 E. Mission Road San Marcos	Leaking Underground Storage Tank Cleanup Site	Completed – Case Closed
Buena Vista Equipment Co. 555 E. Mission Road San Marcos	Cleanup Program Site	Completed – Case Closed
TRI-M-CO 528 E. Mission Road San Marcos	Leaking Underground Storage Tank Cleanup Site	Completed – Case Closed
US Post Office 420 N. Twin Oaks Valley Road San Marcos	Leaking Undergound Storage Tank Cleanup Site	Completed – Case Closed

Location	Description	Status
Timothy Chatton 204 W. Mission Road San Marcos	Cleanup Program Site	Completed – Case Closed
CDF – Former San Marcos Forest Fire Station 236 Pico Ave San Marcos	Leaking Underground Storage Take Cleanup Site	Open - Remediation
Conoco Phillips 190 W. San Marcos Boulevard San Marcos	Leaking Underground Storage Tank Cleanup Site	Completed – Case Closed
Sam Coutts Plastering Inc. 201 La Moree Road San Marcos	Leaking Underground Storage Tank Cleanup Site	Completed – Case Closed

As shown in the table above, listings in the project area have a status of no further action or case closed with the exception of the former CDF station on Pico Avenue. According to the database, soil and groundwater beneath the CDF site were impacted by petroleum from a former 550-gallon underground storage tank. Five wells are monitored annually, and demonstrate that natural attenuation is taking place. The CDF site is located west of Twin Oaks Valley Road, approximately 0.4 mile from the project site. A review of the United States Geological Survey, San Marcos, CA Quadrangle Map depicts the project site as slightly upgradient from the former CDF station. Therefore, even though the case is still open, the petroleum flume is traveling away from the project site.

In summary, the project site is not included on a list of hazardous materials sites nor located near any hazardous materials sites with the potential to impact the site, and, as a result would not create a significant hazard for people residing or working in the area. Additionally, the Phase 1 Environmental Site Assessment prepared for the project did not identify any hazardous conditions on the project or in the vicinity that would impact the project. Thus impacts are less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? No Impact

The proposed project is not located within two miles of a public airport or public use airport. The nearest is the McClellan-Palomar Airport in Carlsbad which is located approximately 6.5 miles west of the project site. The project site falls within Airport Influence Area (AIA) of the McClellan-Palomar Airport Land Use Compatibility Plan (ALUCP), specifically within Review Area 2. Land falling within Review Area 2 consists of locations beyond Review Area 1, but within the airspace protection and/or overflight notification area. Restrictions on heights of structures in high terrain areas are the only restrictions within Review Area 2. Since the project site and future development will be at a lower elevation than adjacent parcels and development, there is not a concern from an airport safety perspective. Therefore, no impact is identified for this issue area.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? No Impact

The proposed project is not located within the vicinity of a private airstrip. Therefore, the project does not have the potential to result in a safety hazard for people residing or working in the project area. No impact is identified for this issue area.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Less than Significant Impact

The project does not propose any development that would impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Construction of the project would not result in any complete road closures. Offsite improvements associated with the extension of the sewer pipeline in Mission Road may require partial lane closures, but not a complete road closure. The San Marcos Fire Department has reviewed the project and has not raised any concerns on this issue. Therefore, impacts are less than significant.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? Less Than Significant Impact

The project site lies within an area considered a Non-Fire Hazard Severity Zone, as designated by the San Marcos Fire Department and California Department of Forestry and Fire Protection. Given the site's proximity to wildland areas, a Fire Protection Plan (FPP) was prepared for the project by Dudek (2014). The FPP addresses water supply, access (including secondary/emergency access where applicable), structural ignitability and ignition resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. The complete plan is included as **Appendix H**. Implementation of the plan will be required as a condition of project approval. The FPP will also be reviewed and approved by the City's Fire Marshal.

As specified in the FPP, the on-site structures will be constructed to the 2013 California Fire Code and Building Code (Chapter 7A), as adopted by the City of San Marcos. Construction shall include enhanced ignition-resistant features, automatic interior sprinklers, appropriate fire flow and water capacity, roads and supporting infrastructure, and fuel modification areas.

Additionally, a 150-foot fuel management zone will be provided on three sides of the project site, per San Marcos Fire Code. Fuel management will occur in three zones, as described below. Habitat impacts due to fuel management were considered in the biological resources analysis in this document.

Zone A comprises the first 50 feet around a structure, with the exception of units located north of Driveway M (upper fire access roadway), which will receive approximately 35 feet of treatment. This zone is irrigated and shall be planted with high-leaf-moisture, fire-resistive plants consistent with the County of San Diego Suggested Plant List for Defensible Space as ground cover and include well-spaced trees and shrubs.

Zone B generally covers 51 to 100 feet beyond structures. Zone B is a non-irrigated reduced fuel zone that consists of ground cover less than six inches high with adequately spaced trees and shrubs. No more than 50 percent of native, non-irrigated vegetation will be retained, and all dead plant material and trimmings will be removed in this zone. Special requirements of off-site fuel modification where Zone B overlaps with the existing biological conservation easements are detailed later in this section.

Zone C generally covers 101 to 150 feet beyond structures. Like Zone B, Zone C is a non-irrigated reduced fuel zone that consists of ground cover less than six inches high with adequately spaced trees and shrubs. No more than 30 percent of native, non-irrigated vegetation will be retained, and all dead plant materials and trimmings will be removed in this zone. Special requirements of off-site

fuel modification where Zone C overlaps with the existing biological conservation easements are detailed later in this section.

For those areas where Zone B and Zone C fuel management overlaps with the conservation easement for two parcels (APNs 220-480-01 and 220-480-06), special clearing techniques shall be used, as detailed in the FPP. The management shall be accomplished through selective hand-clearing of the most highly flammable plants and retaining small patches of native vegetation. Fuel modification in the conservation easements will require approval from the Golden State Lands Conservancy and the appropriate resources agencies, if warranted, prior to any vegetation management activities in those areas. The brush management zones and conservation easements are presented in **Figure 8.**

Fire fuel modification of 20 feet will also occur on either side of project roadways, as per San Marcos Fire Department Fire Code. Vertical clearance of 13.5 feet shall also be required along these roadways.

Annual fuel modification shall be completed by May 1 of each year, and more often as determined by the San Marcos Fire Department to maintain the fuel modification zone function of gradually reducing fire intensity and flame lengths from advancing fire. Homeowners will be responsible for all required fuel treatment measures on their lot. The homeowner's association will be responsible for all vegetation management throughout the common and fuel management zone easement areas of the project site. The homeowner's association will be responsible for ensuring long-term funding and ongoing compliance with fuel modification and maintenance requirements throughout the private portions of the project site as well as on all fuel modification zone easements.

Emergency Access

Primary access to the project site will be via a newly constructed driveway N originating at the east corner of the site and intersecting with East Mission Road. A left turn lane will be added to the eastbound side of East Mission Road as part of the proposed project for additional project access. A secondary emergency access road is proposed at the southwest corner of the project site, which will have dual access in and out of the development with traffic flowing westbound on East Mission Road.

According to the FPP, since this site will utilize ignition resistant construction techniques, the proposed fuel modification areas will provide adequate set back from the on-site structures. With incorporation of the fuel management zone and routine maintenance in full compliance with the fire protection plan prepared for the project, implementation the Mission 316 Specific Plan will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Impacts are less than significant.

Figure 8. Brush Management Zones

VIII. HYDROLOGY AND WATER QUALITY[SHM1]

A water quality improvement plan and a hydrology report were prepared for the project. These documents are included as **Appendix I** and **Appendix J** of this document.

a) Violate any water quality standards or waste discharge requirements? Less than Significant Impact

The project will comply with all water quality standards and waste discharge requirements. Since the project includes disturbance to more than an acre, a Construction General Permit from SWRCB will be require prior to the issuance of a grading permit. A Storm Water Pollution Prevention Plan (SWPPP) will be developed and implemented in accordance with Risk Level 2. The SWPPP will identify Best Management Practices (BMPs) to protect storm water runoff.

New Regional MS4 Permit

On May 8, 2013, the SDRWQCB adopted Order R9 2013-0001, the new Regional MS4 Permit. The permit becomes effective June 27, 2013. Provision E.3.e.(1)(a) of R9 2013-0001 identifies that projects that received prior lawful approval by the time the City's SUSMP is revised in accordance with R9 2013-0001 provision E3.d that the City may allow the prior land development requirements of R9 2007-0001 (as amended January 4, 2011) to apply to the project.

The City is required to update its SUSMP land development requirements within three months of the SDRWQCB concurrence of the Carlsbad Watershed WQIP which is estimated to be 24 months after the May 8, 2013 adoption of R9 2013-0001 or approximately December 2015. The City will make project-specific determinations on a case-by-case basis as to what constitutes prior lawful approval based on its Municipal Code, Ordinances, and project milestones within the development process to identify the appropriate MS4 permit land development requirements that are applicable to each project.

The proposed project has been designed to comply with the land development requirements of Order R9 2007-001 for reliance on the City Standard Urban Stormwater Mitigation Plan (SUSMP) (as amended January 14, 2011). Long term water quality and HMP requirements are mitigated through appropriate design and mitigation requirements for residential, parking lot, and street land uses.

The proposed project is on a development schedule to achieve prior lawful approval under the land development requirements of the SDRWQCB R9 2013-0001 permit and the City's SUSMP, adopted under SDRWQCB permit R9 2007-0001, in accordance with the City's municipal ordinances and is therefore in compliance with the SDRWQCB MS4 permit at this time.

Prior to final issuance of construction permits, the City will evaluate the project's land development milestones and construction schedule and issue a Final Determination of Prior Lawful Approval and determination of applicable MS4 Permit development requirements and MS4. The project will be required to provide a design to mitigate water quality and the hydromodification management plan (HMP) under the land development requirements deemed to be in effect under the R9 2013-0001 permit at the time of permits.

At this time, it is anticipated that no substantive changes will occur with project design based on the recent adoption of R9 2013-0001and the projects development milestone schedule for construction

and implementation. In summary, the proposed project will not violate any water quality standards or waste discharge requirements. Impact will be less than significant.

b) Have a potentially significant adverse impact on groundwater quality or cause or contribute to an exceedance of applicable groundwater receiving water quality objectives or degradation of beneficial uses? Less than Significant Impact

The project does not propose any uses or irrigation with groundwater or wells that would impact ground water quality or cause or contribute to an exceedance of applicable groundwater receiving water quality objectives or degradation of beneficial uses. The project proposes residential uses. The project would not result in any degradation to groundwater quality. Therefore, impacts are less than significant.

c) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? No Impact

The project does not propose the use of groundwater. Potable water for residential and landscaping uses will be provided by Vallecitos Water District. No groundwater will be used. Thus, no impact is identified for this issue area.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site (e.g., downstream)? Less than Significant Impact

Short Term (Project Construction)

The project site is generally flat and does not support any streams or rivers. Grading would occur on the project site to prepare the site for the future residential buildings; however none of this will alter the existing drainage patterns on the site. Additionally, the project will incorporate construction BMPs in compliance with Risk Level 2 of the General Construction Permit. These BMPs focus on areas such as good site management/housekeeping, non-stormwater management, erosion control, sediment control, run-on and run-off control, inspection/maintenance/repair, rain event action plan, and monitoring/reporting requirements. Implementation of these BMPs will further reduce the potential for erosion and siltation entering waterways. Impact will be less than significant.

Long Term (Project Operation)

The project site is undeveloped and does not support any impervious surfaces. Under the proposed project, approximately 32 percent of the site will be impervious surfaces. This includes pavement, sidewalks and roof areas. Based upon the drainage and hydromodification report prepared by Excel Engineering (2014), the pre-development conditions on the site have a runoff rate of 40.53 cfs. In the post development condition, the project will reduce the runoff to 29.59 cfs. This decrease is due to the use of detention in the bio-retention system, which are planted open depressions in the landscape designed to accept stormwater from adjacent impervious surfaces. Therefore impacts would be less than significant.

e) Create a significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes? Less than Significant Impact

The project site is undeveloped and does not support any impervious surfaces. Under the proposed project, approximately 32 percent of the site will be impervious surfaces. This includes pavement, sidewalks and roof areas. Based upon the drainage and hydromodification report prepared by Excel Engineering (2014), the pre-development conditions on the site have a runoff rate of 40.53 cfs. In the post development condition, the project will reduce the runoff to 29.59 cfs. Thus, the project does not create a significant adverse environmental impact to drainage patterns due to changes in runoff rates or volumes and impacts are less than significant.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Less than Significant Impact

The project site is undeveloped and does not support any impervious surfaces. There are no existing streams or rivers on the project site. Under the proposed project, approximately 32 percent of the site will be impervious surfaces. This includes pavement, sidewalks and roof areas. Based upon the drainage and hydromodification report prepared by Excel Engineering (2014), the pre-development conditions on the site have a runoff rate of 40.53 cfs. In the post development condition, the project will reduce the runoff to 29.59 cfs.

Thus, the project does not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on-or off-site. Impacts would be less than significant.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? Less than Significant Impact

Storm water run-off will be treated in accordance with the Regional Water Quality Control Board's (RWQCB) current permit. A Water Quality Improvement Plan, WQIP, prepared for the development, specifies source control BMP's, low impact development designs, LID, and treatment BMP's to be used. Bioretention basins and porous pavers distributed around the site will act as treatment control BMP's. The bio-retention basins and porous paver base materials will also serve to satisfy the RWQCB's requirements for hydromodification.

The storm drain system will consist of two components. The first component will collect onsite runoff through area drains, grated and curb inlets and convey flows to the bioretention basin located along the Mission Road frontage. The bioretention basin will serve to clean the runoff and provide hydro modification, in accordance with the most current RWQCB permits. Flows from the basins will drain to the public system along the Specific Plan area's frontage along Mission Road. The second storm drain component will convey flows from uphill of the development to the existing storm drain in Mission Road. Offsite runoff will not comingle with onsite flows until downstream of the water quality basins. Thus the project will not 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 and impacts are less than significant.

h) Result in increased impervious surfaces and associated increased runoff? Less than Significant Impact

The project site is undeveloped and does not support any impervious surfaces. Under the proposed project, approximately 32 percent of the site will be impervious surfaces. This includes pavement, sidewalks and roof areas. Based upon the drainage and hydromodification report prepared by Excel Engineering (2014), the pre-development conditions on the site have a runoff rate of 40.53 cfs. In the post development condition, the project will reduce the runoff to 29.59 cfs.

Thus, the project does not result in a significant increase in impervious surface or increased runoff and impacts are less than significant.

i) Result in significant alteration of receiving water quality during or following construction? Less than Significant Impact

Short Term (Project Construction)

The project will incorporate construction-related water quality BMPs to protect water quality. The requirements will be identified in the Storm Water Pollution Protection Plan (SWPPP). Such measures could include, but are not limited to:

- Use of sediment trapping devices to control sediment runoff;
- Proper containment and disposal of trash/debris;
- Use of erosion control devices to minimize runoff during rain events; and
- Additional measures to be indentified once SWPPP is available prior to the issuance of the grading permit and start of work onsite.

Preparation and implementation of a SWPPP and construction-related water quality BMPs will ensure that there are no significant alterations to receiving water quality during construction. Impacts would be less than significant.

Long Term (Project Operation)

With regard to project operation, the project includes a comprehensive water quality management approach. The project incorporates porous pavers, landscaping, and bioretention features of various sizes for water quality and HMP purposes. Additionally, the project will implement a variety of site design, source control, LID, and treatment control BMPs in accordance with Order R9 2007-001 to treat to a medium pollutant removal rate or better for the pollutants of concern (nutrients and bacteria) and minimize the potential for pollutants such as sediment, trash, metals, bacteria, oil/grease and organics prior to reaching the storm drain and off-site waterways. The project is required to integrate into its design site design, source control, LID, and treatment control BMPs in accordance to R9 2007-0001 or R9 2013-0001. Thus the project will would not result in significant alterations to receiving water quality after construction and impacts are less than significant.

j) Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash). Less than Significant Impact

The project includes a comprehensive water quality management approach. The project incorporates eight sand filters and five bioretention features of various sizes for water quality and hydrology purposes (see the analysis in Section IX(k) below).

The City's Standard Urban Stormwater Management Plan (SUSMP) requires that the pollutants of concern for each impaired water body in each watershed be treated by engineered treatment controls to a medium pollutant removal efficiency or better prior to leaving each development site. This requirement results in reductions in pollutants.

The proposed project will be required to implement source control, site design, LID standards (e.g., permeable pavement, bioretention facilities), and water quality treatment for the pollutants of concern within the watershed. Engineered treatment controls include LID and BMP techniques such as permeable pavement, media filtrations devices and bioretention facilities. The BMPs required consist of both structural and nonstructural measures, including retention basins, first flush diversion devices, porous pavements, public education, and street sweeping. Thus the project will have a less than significant impact with regard to increasing the pollutant discharges to receiving waters.

k) Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired? Less than Significant Impact

The project site is located in the Richland (904.52) hydrologic sub-area of the San Marcos (904.5) hydrologic area of the Carlsbad watershed. Impaired waterbodies in this watershed include San Marcos Creek (DDE, phosphorus, sediment toxicity, and selenium) and San Marcos Lake (ammonia as nitrogen, nutrients), and the Pacific Ocean (total coliform).

Anticipated pollutants from residential development include: sediments, nutrients, trash/debris, pesticides, and a potential for oxygen demanding substances, oil/grease, and bacteria/viruses. Potential pollutants that could occur from the parking lot include heavy metals, organic compounds, trash/debris, oil/grease, and to a lesser extent sediment, nutrients, and pesticides. Potential pollutants from the proposed roadways in the project site include sediment, heavy metals, organic compounds, trash/debris and oil/grease and to a lesser extent nutrients and oxygen demanding substances.

As detailed in IX(k), above, the project includes a comprehensive water quality management approach. The project incorporates bioretention features of various sizes for water quality and hydrology purposes. See IX(k), above. Impacts will be less than significant.

l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions? Less than Significant Impact

As detailed in IXj, above, the project includes a comprehensive water quality management approach. The project incorporates sand filters and bioretention features of various sizes for water quality and hydrology purposes. Additionally, the project will implement a variety of source control BMPs to minimize the potential for pollutants such as sediment, trash, metals, bacteria, oil/grease, and organics to reach the storm drain and off-site waterways. Additionally, the project will implement several source control BMPs to further minimize the potential to have a significant

environmental impact on surface water quality. Thus the project will not exacerbate any existing sensitive conditions in environmentally sensitive areas. Therefore, impacts are less than significant.

m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters? Less than Significant Impact

As detailed in IXj, above, the project includes a comprehensive water quality management approach. The project incorporates sand filters and bioretention features of various sizes for water quality and hydrology purposes. See IX(k), above. Impacts are less than significant.

n) Otherwise substantially degrade water quality? Less than Significant Impact

A thorough discussion related to water quality has been provided in Sections IX(h) through IX(m). There are no additional features of the project that would result in a potential substantial degradation to water quality that was not already analyzed. Therefore, no additional impacts are identified.

o) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? No Impact

The project site is not located within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazards delineation map. While the project does propose housing, it will not place that housing in any areas that are described by this threshold. Therefore, no impacts are identified for this issue area.

p) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? No Impact

The project site is not located within a 100-year flood hazard area (General Plan Figure 6-3). Therefore, the project will not develop any structures which would impede or redirect flood flows. No impact is identified.

q) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? No Impact

The project site is not located within a 100-year flood zone nor is it located within a dam inundation zone (General Plan Figure 6-3). Therefore, no impact is identified for this issue area.

r) Inundation by seiche, tsunami, or mudflow? No Impact

The proposed project is not located near a coastline, lake, or mountainous area that would be subject to a seiche, tsunami, or mudflow. No impacts are identified for this issue area.

X. LAND USE AND PLANNING

The Mission 316 Specific Plan project proposes a residential development of 95 units as well as associated infrastructure. The residential site development plan was included as Figure 2 of this document.

a) Physically divide an established community? No Impact

The proposed project would not divide an established community. The project site is currently undeveloped but designated and zoned for commercial development. The placement of attached residential units on the site will provide a buffer between existing industrial, commercial, and mobile home units to the south and existing low and medium-density residential to the north. Therefore, the project would not divide an established community and no impact is identified.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Less than Significant Impact

The project site is designated and zoned Heart of the City Specific Plan Area in the City's General Plan. Within the Heart of the City Specific Plan, the project site is designated for commercial uses. The commercial designation allows for general commercial centers serving a wider range of retail needs than neighborhood commercial uses. Under the current designation, no residential units would be developed on the project site.

The project proposes 95 attached residential units on approximately ~~8.98~~9.0 acres yielding a density of 10.5 du/acre. Because the proposed density varies from the commercial uses allowed under the Heart of the City Specific Plan, a General Plan Amendment and rezone are required to change the land use designation and zoning to Mission 316 Specific Plan Area. A General Plan Amendment and rezone are included as discretionary actions of the project. With approval of the project, the proposed densities will be consistent with the General Plan. Impacts are less than significant.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? No Impact

As described above in Section IV(f), the project site is located within the North County MHCP; however, the project site is located outside of the MHPA San Marcos SAP FPA. Because the project site lies outside of the FPA, implementation of the project would not conflict with ay applicable habitat conservation plan or natural community conservation plan. No impact is identified for this issue area.

XI. MINERAL RESOURCES

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state? No Impact

Based upon review of the Mineral Land Classification Maps, the City of San Marcos has been identified as unsuitable as a source of sand and gravel resources (CDC 2012b). There are no known mineral resources on the site of value to the region or to residents of the state. Therefore, the project would not have an impact on any known mineral resource and no impact is identified for this issue area.

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? No Impact

Based upon review of the Mineral Land Classification Maps, the City of San Marcos has been identified as unsuitable as a source of sand and gravel resources (CDC 2012b). There are no known mineral resources on the site of value to the region or to residents of the state. Therefore, the

project would not have an impact on any known mineral resource and no impact is identified for this issue area.

XII. NOISE

A noise impact analysis was prepared for the project by LdN Consulting (2014). The complete report is included as **Appendix K** of this document.

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Less Than Significant Impact with Incorporation of Mitigation

Existing Noise Environment

Noise measurements were taken project site in August 2014. The results of the noise level measurements are presented in **Table 9a**. The measurements were taken on site to establish a baseline of the vehicle noise from adjacent Mission Road. The noise monitoring location can be seen in **Figure 9.**

Table 9a. Measured Ambient Noise Levels

Measurement Identification	Description	Time	Noise Levels (dBA Leq)					
			Leq	Lmax	Lmin	L10	L50	L90
ML 1	Along Mission Road	7:15 – 7:30 AM	64.6	71.9	46.0	67.6	63.8	55.6

Source: Ldn Consulting (2014)

Future On-site Noise Analysis

To determine the future noise environment and impact potentials the Sound32 model was utilized. **Table 9b** presents the roadway parameters used in the analysis including the peak traffic volumes, vehicle speeds, and the hourly traffic flow distribution (vehicle mix). The vehicle mix provides the hourly distribution percentages of automobile, medium trucks, and heavy trucks for input into the Sound32 Model. The buildout conditions include the future traffic volume forecasts provided in the project's traffic study (RBF Consulting 2014).

Table 9b. Future Traffic Parameters

Roadway	Average Daily Traffic (ADT)	Peak Hour Volumes	Modeled Speeds (MPH)	Vehicle Mix %		
				Auto	Medium Trucks	Heavy Trucks
E Mission Road	31,283	3,128	45	96	2	2

Source: Ldn Consulting (2014)

To evaluate the potential noise impacts on the proposed development, outdoor observers were located throughout the site and placed five feet above the finished pad elevation. The modeled observer locations for the potential outdoor use areas are presented in **Figure 10**. It should be noted: there are no ground floor outdoor private use areas along Mission Road. These units have second floor balconies that provide the private use area. The second floor balconies were modeled to determine if shielding/mitigation is required to reduce the noise levels below the City's 65 dBA CNEL threshold. The modeling results are presented in **Table 10**.

Table 10. Future Exterior Noise Levels

Receptor Number	Unmitigated Second Floor Balcony/Deck Noise Levels (dBA CNEL)	Barrier Heights (Feet)	Mitigated Second Floor Balcony/Deck Noise Levels (dBA CNEL)	Worst Case Building Façade Noise Levels (dBA CNEL)
1	69	**4**	63	69
2	70	**4**	64	70
3	71	**4**	64	71
4	71	**4**	64	71
5	71	**4**	65	71
6	72	**4**	65	72
7	72	**4**	65	72
8	62	0	62	62
9	62	0	62	62
10	62	0	62	62

As shown in Table 10, unmitigated second floor balcony noise levels exceed 65 dBA CNEL for receptor location 1 through 7. This represents a significant impact (**Impact N-1**) and mitigation is required.

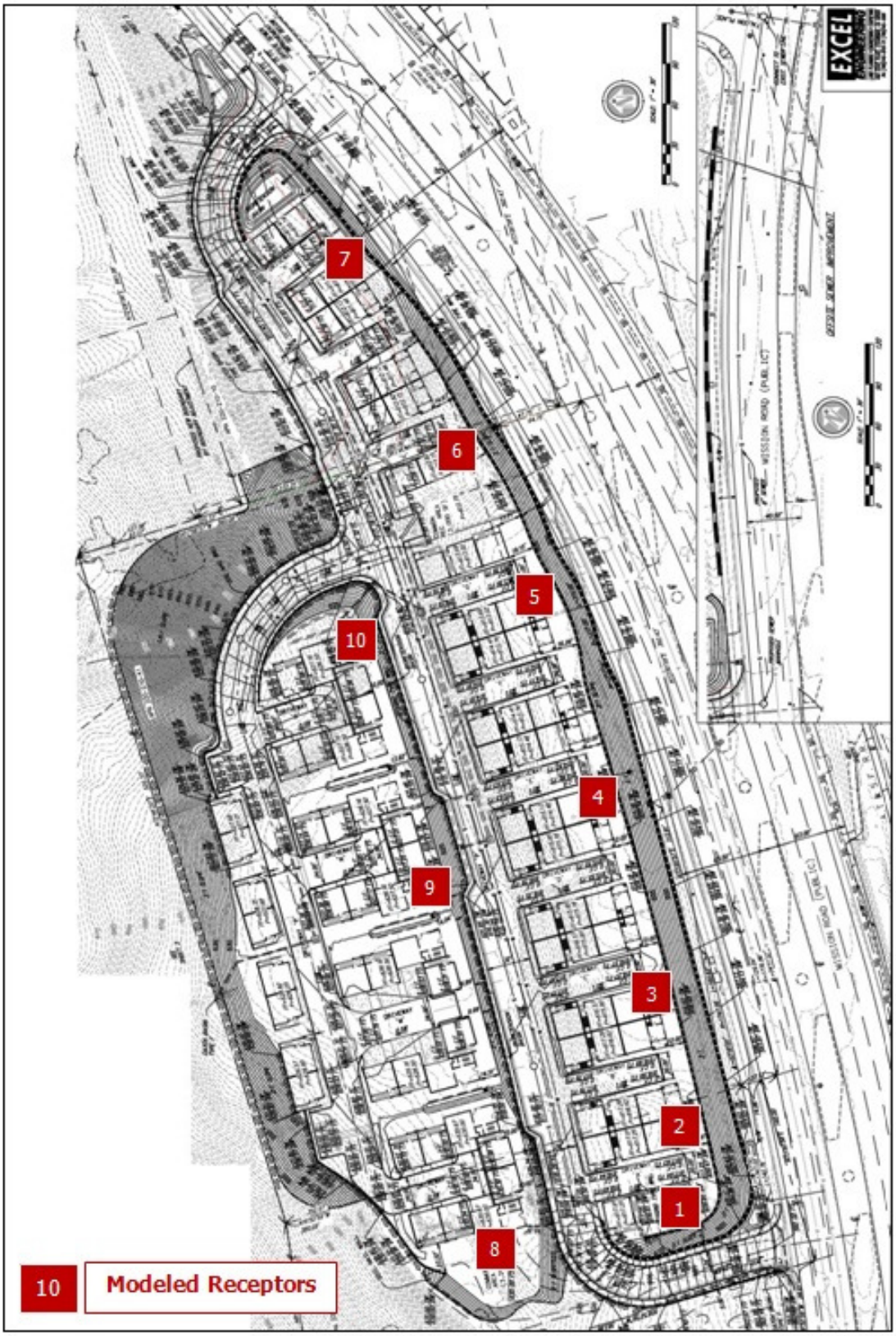
MM-N-1 A 4-foot high noise barrier shall be required for second floor balconies of the units along Mission Road as shown in **Figure 11**. The barriers shall be constructed of non-gapping materials such as masonry stone, ¼ inch-thick glass, Plexiglass, or a combination of these materials architecturally integrated with the project. Verification of the type of noise reduction barrier material shall be provided to the Planning Director for review and approval prior to grading permit issuance. The barrier shall reduce the exterior noise levels to comply with the City of San Marcos Noise standards of 65 dBA CNEL at the multi-family residences and any outdoor usable areas. Afinal noise assessment shall be prepared prior to the issuance of the first building permit. This final report would identify the interior noise requirements based upon architectural and building plans to meet the City's established interior noise limit of 45 dBA CNEL.

As shown in Table 10, with inclusion of 4-foot high barriers on the balconies, noise levels will be reduced to 65 dBA CNEL or lower, which is consistent with the City's noise standards. Thus impacts would be mitigated to below a level of significance.

Figure 9. Noise Modeling Locations

Source: Ldn Consulting (2014)

Figure 10. Modeled Receptor Locations



Source: Ldn Consulting (2014)

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? Less Than Significant Impact

The nearest vibration-sensitive uses are the residences located 300 feet or more from the proposed construction. **Table 11** lists the average vibration levels that would be experienced at the nearest vibration sensitive land uses from the temporary construction activities.

Table 11. Vibration Levels from Construction Activities (Residential Receptors)

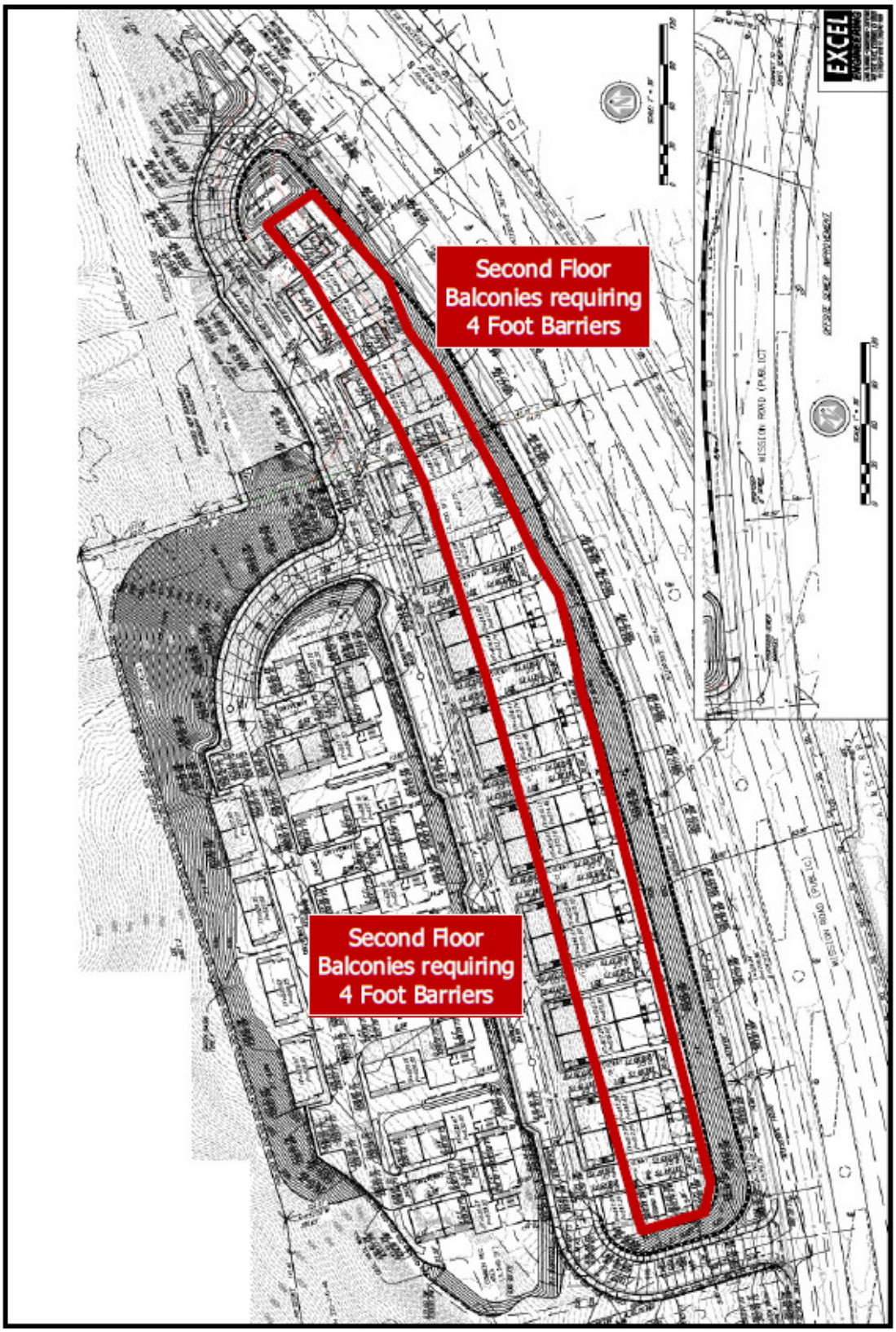
Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate RMS Velocity at 25 Feet (in/sec)	Approximate Velocity Level at 200 Feet (VdB)	Approximate RMS Velocity at 200 Feet (in/sec)
Small bulldozer	58	0.003	30.4	0.0001
Jackhammer	79	0.035	51.4	0.0008
Loaded trucks	86	0.076	58.4	0.0018
Large bulldozer	87	0.089	59.4	0.0021
		FTA Criteria	80	0.2
		Significant Impact?	**No**	**No**

Source: Ldn Consulting (2014) Note: [1] PPV at Distance D = PPVref x $(25/D)^{1.5}$

The Federal Transit Administration (FTA) has determined vibration levels that would cause annoyance to a substantial number of people and potential damage to building structures. The FTA criterion for vibration induced structural damage is 0.20 in/sec for the peak particle velocity (PPV). Project construction activities would result in PPV levels below the FTA's criteria for vibration induced structural damage. Therefore, project construction activities would not result in vibration induced structural damage to residential buildings near the demolition and construction areas. The FTA criterion for infrequent vibration induced annoyance is 80 Vibration Velocity (VdB) for residential uses. Construction activities would generate levels of vibration that would not exceed the FTA criteria for nuisance for nearby residential uses. Therefore, vibration impacts would be less than significant.

Blasting for construction projects typically results in an RMS vibration velocity of about 100 VdB at 50 feet from the blast based on FTA findings. This is equivalent to a peak particle velocity of about 0.4 inch per second. As discussed above the smallest distance between an existing residence and the blasting activity was assumed to be 300 feet. Given attenuation of vibration velocities with distance, the RMS vibration velocity and peak particle velocity at the nearest existing residence would be about 79 VdB and 0.03 inch per second, respectively. Based on the construction vibration damage criteria published by the FTA, the threshold vibration levels for damage to "Non-engineered timber and masonry buildings" are 94 VdB and 0.20 inch per second. Therefore, the effect of the blasting activity on nearby residential structures will not be significant. On the other hand, the human annoyance criterion of 80 VdB would be slightly exceeded when blasting occurred within about 250 feet of existing residences. If blasting is required within 250 feet of existing residences, the potential annoyance may not be completely avoided, however it can be minimized by following the City's blasting procedures, as identified in Title 17 of the City's Municipal Code. Adherence to these procedures is required by law and this requirement is included in the project design feature table (Table 1). These requirements include:

Figure 11. Balconies Requiring Noise Mitigation



- The general contractor or property owner/developer shall give reasonable notice in writing at the time of issuance of a building permit, grading permit or encroachment license to all residences or businesses within 600 feet of any potential blast location. The notice shall be in a form approved by the Building Director. Any resident or business receiving such notice may request of the Building Director that a notice of impending blasting be given by the blaster at the time of the 12 hour advance notice given to the Building Director. The general contractor or property owner/developer shall make all reasonable efforts to contact any and all parties requesting the second notice.
- The blaster shall file a written certification with the Building Director certifying that the general notice required by Section 17.60.060(b) has been given. The certificate shall include addresses and date(s) of notification. A copy shall be retained on file at the Building Division.
- Inspections of all structures within 300 feet of the blast site shall be made before blasting operations. The persons inspecting shall obtain the permission of the building owner to conduct an inspection. The inspections shall be done by a registered struc4tural engineer employed by the blaster or project contractor. The inspection shall be only for the purpose of determining the existence of any visible or reasonably recognizable pre-existing defects or damages in any structure. Inspection refusal shall be at the discretion of the property owner.
- Blasting shall only be permitted between the hours of 9:00 a.m. and 4:00 p.m. during any weekday, Monday through Friday, exclusive of City recognized holidays unless special circumstances warrant another 4time or day and special approval is granted by the Building Director and Fire Chief.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? <u>Less than Significant</u>

Project Related Off-site Transportation Noise

Because mobile/traffic noise levels are calculated on a logarithmic scale, a doubling of the traffic noise or acoustical energy results in a noise level increase of 3 dBA. Therefore, the doubling of the traffic volume, without changing the vehicle speeds or mix ratio, results in a noise increase of 3 dBA. Community noise level changes greater than 3 dBA are often identified as audible and considered potentially significant, while changes less than 1 dBA will not be discernible to local residents. In the range of 1 to 3 dBA, residents who are very sensitive to noise may perceive a slight change.

Community noise exposures are typically over a long time period rather than the immediate comparison made in a laboratory situation. Therefore, the level at which changes in community noise levels become discernible is likely greater than 1 dBA, and 3 dBA appears to be an appropriate threshold for most people. For the purposes of this analysis direct and cumulative roadway noise impacts would be considered significant if the project increases noise levels for a noise-sensitive land use by 3 dBA CNEL and if the project increases noise levels above an unacceptable noise level per the City's General Plan in the area adjacent to the roadway segment.

The projected off-site project-related roadway segment noise levels were calculated using the methods in the Highway Noise Model published by the Federal Highway Administration (FHWA Highway Traffic Noise Prediction Model, FHWA-RD-77-108, December, 1978).

Project Direct Off-Site Noise Impact Analysis

To determine if direct off-site noise level increases associated with the development of the proposed project will create noise impacts, the noise levels for the existing conditions were compared with the noise level increase from the project. Utilizing traffic assessment prepared for the project (RBF Consulting 2014) noise contours were developed for the following traffic scenarios:

- Existing: Current day noise conditions without construction of the project.
- Existing Plus Project: Current day noise conditions plus the completion of the project.
- Existing vs. Existing Plus Project: Comparison of the direct project related noise level increases in the vicinity of the project site.

The noise levels and reference distances to the 60 dBA CNEL contours for the roadways in the vicinity of the project site are given in **Table 12** for the Existing Scenario and in **Table 13** for the Existing Plus Project Scenario. It should be noted that the values in Tables 12 and 13 do not take into account the effect of any noise barriers or topography that may affect ambient noise levels.

Table 12. Existing Noise Levels

Roadway	Roadway Segment	ADT	Vehicle Speeds (MPH)	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Mission Road	San Marcos Blvd to Mulberry Drive	20,145	45	72.3	845

Source: Ldn Consulting 2014

Table 13. Existing + Project Noise Levels

Roadway	Roadway Segment	ADT	Vehicle Speeds (MPH)	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Mission Road	San Marcos Blvd to Mulberry Drive	20,753	45	72.4	871

Source: LdN Consulting 2014

Table 14 presents the comparison of the Existing Year with and without project-related noise levels. As shown in Table 14, the overall roadway segment noise levels will increase 0.1 dBA CNEL with the development of the proposed project. None of the segments have an increase of 3 dBA. Therefore, the project's direct contribution to off-site roadways is less than significant.

Table 14. Existing vs. Existing + Project Noise Levels

Roadway	Roadway Segment	ADT	Vehicle Speeds (MPH)	Noise Level @ 50 Feet (dBA CNEL)
Mission Road	San Marcos Blvd to Mulberry Drive	72.3	72.4	0.1

Source: Ldn Consulting 2014

Cumulative Off-Site Noise Impact Analysis

To determine if cumulative off-site noise level increases associated with the development of the project and other planned or permitted projects in the vicinity will create noise impacts, the noise levels for the near-term project buildout and other planned and permitted projects were compared with the existing conditions. Utilizing the project's traffic assessment (RBF Consulting 2014) noise contours were developed for the following traffic scenarios:

- ***Existing:*** Current day noise conditions without construction of the project.
- ***Existing Plus Cumulative Projects Plus Project:*** Current day noise conditions plus the completion of the project and the completion of other permitted, planned projects, or approved ambient growth factors.
- ***Existing vs. Existing Plus Cumulative Plus Project:*** Comparison of the existing noise levels and the related noise level increases from the combination of the project and all other planned or permitted projects in the vicinity of the site.

The existing noise levels and reference distances to the 60 dBA CNEL contours for the roadways in the vicinity of the project site are given in Table 13 above for the Existing Scenario. The near-term cumulative noise conditions are provided in **Table 15**. No noise barriers or topography that may affect noise levels were incorporated in the calculations.

Table 15. Existing + Project + Cumulative Roadway Noise Levels

Roadway	Roadway Segment	ADT1	Vehicle Speeds (MPH)	Noise Level @ 50 Feet (dBA CNEL)	60 dBA CNEL Contour Distance (Feet)
Mission Road	San Marcos Blvd to Mulberry Drive	23,730	45	73.0	995

Source: Ldn Consulting 2014

Table 16 presents the comparison of the Existing Year and the Near-Term Cumulative noise levels. The overall roadway segment noise levels will increase from 0.7 dBA CNEL with the development of the project. No cumulative noise increase of more than 3 dBA CNEL was found; therefore, a less than significant impact is anticipated.

Table 16. Existing vs. Existing + Project + Cumulative Roadway Noise Levels

Roadway	Roadway Segment	Existing Noise Level @ 50 Feet (dBA CNEL)	Existing Plus Project Noise Level @ 50 Feet (dBA CNEL)	Project Related Noise Level Increase (dBA CNEL)
Mission Road	San Marcos Blvd to Mulberry Drive	72.3	73.0	0.7

Source: Ldn Consulting 2014

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? **Less Than Significant Impact with Incorporation of Mitigation**

Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment includes bulldozers, water truck, loader/crawler, dump truck, road grader, backhoe, drill rig and rock crusher. Such equipment can reach relatively high noise levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours.

The City of San Marcos Municipal Code limits grading, extraction, and construction activities between 7:00 a.m. and 4:30 p.m. Monday through Friday and no grading, extraction or construction is allowed on the weekends or holidays. The Municipal Code does not set noise limits on construction activities. Commonly, the City has utilized the County of San Diego's Noise Ordinance noise limit of 75 dBA for other projects.

The U.S. Environmental Protection Agency (U.S. EPA) has compiled data regarding the noise-generating characteristics of specific types of construction equipment. Noise levels generated by heavy construction equipment can range from 60 dBA to in excess of 100 dBA when measured at 50 feet. However, these noise levels diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 75 dBA measured at 50 feet from the noise source to the receptor would be reduced to 69 dBA at 100 feet from the source to the receptor, and reduced to 63 dBA at 200 feet from the source.

Using a point-source noise prediction model, calculations of the expected construction noise impacts were completed. The essential model input data for these performance equations include the source levels of each type of equipment, relative source to receiver horizontal and vertical separations, the amount of time the equipment is operating in a given day, also referred to as the duty-cycle, and any transmission loss from topography or barriers.

The equipment needed for the development will consist of includes two bulldozers, a water truck, a front loader, a crawler excavator, dump truck, road grader, backhoe, drill rig and rock crusher Based on the EPA noise emissions, empirical data and the amount of equipment needed, worst case noise levels from the construction equipment for site preparation would occur during the grading operations.

Construction Grading Noise Analysis

The grading activities will consist of the preparation of internal roadways, parking and the finished pads. The grading equipment will be spread out over the project site from distances near the occupied property lines to distances of 500 feet or more away. Based upon the site plan the majority of the grading operations, on average, will occur more than 300 feet from the property lines. This means that most of the time the average distance from all the equipment to the nearest property line is 300 feet. **Table 17a** presents the anticipated construction noise levels. As can be seen in Table 17a, at an average distance of 270 feet from the construction activities to the nearest property line would result in a noise attenuation of -14.6 dBA.

Table 17a. Construction Noise Levels

Equipment Type	Quantity Used	Source @ 50 Feet (dBA)	Cumulative Noise Level @ 50 Feet (dBA)
Tractor/Backhoe	1	72	72.0
Dozer D9 Cat	2	74	77.0
Loader/Grader	1	73	73.0
Excavator	1	72	72.0
Water Trucks	1	70	70.0
Dump Trucks	1	75	75.0
Paver/Blade	1	75	75.0
Drill Rig	1	83	83.0
Hoe Ram	1	87	87.0
		Cumulative Level	89.6
		Distance to Sensitive Use	270
		Noise Reduction due to Distance	-14.6
		Property Line Noise Level	**75.0**

Given this, the noise levels will comply with the 75 dBA Leq standard at the property lines. Therefore, impacts are anticipated to be less than significant and no mitigation is required during construction of the proposed project. To help control the noise levels from the haul truck, a speed limit of 15 MPH should be posted along the on-site route and signage limiting the use of engine "jake" graces. Additionally, all equipment should be properly fitted with mufflers and all staging and maintenance should be conducted as far away for the existing residences as possible. These requirements have been included as project design features in Table 1.

Rock Crusher Analysis

This section examines the potential noise source impacts associated with the operation of the proposed temporary rock crushing facility. Rock crushing will occur between the hours of 7:00 AM and 4:00 PM. The rock crushing equipment will be a Thunderbird Hazemag Impact Crushing Plan #CP300 or equivalent and will be located in the southwestern corner of the site near the access road, approximately 500 feet from the nearest residence (Figure 3). Based on empirical data collected at a material processing plant in the City of Upland noise levels from a rock crusher ranged between 80-86 dBA at 45 feet. A worst-case noise level of 86 dBA at 45 feet will be utilized for the analysis.

The nearest residence to the proposed rock crusher location is approximately 500 feet to the north and south across Mission Road. **Table 17b** shows the noise reductions due to distance. As shown in Table 17b, when distance is considered, the noise levels are expected to be 65.1 dBA, which is higher than the City's 60 dBA Leq standard at the property lines. This represents a significant impact (**Impact N-2**) and mitigation is required.

Table 17b. Rock Crushing Noise Levels

Equipment Type	Quantity Used	Source @ 50 Feet (dBA)	Duty Cycle (hrs/day)	Cumulative Noise Level @ 50 Feet (dBA)
Thunderbird Hazemag #CP300	1	86	8	86.0
			Distance to Sensitive Use	500
			Noise Reduction due to Distance	-20.9
			Property Line Noise Level	**65.1**

MM-N-2 Noise mitigation will be required for the crusher to break line of site from the crusher to nearby residences. Shielding can be achieved through an earthen berm, 5/8-inch plywood, 1-inch acoustical blankets, or a combination of these strategies. Earthen berm and/or plywood shall be one to two feet above the top of the crushing equipment to break line-of-site between the crusher and off-site residences. The reductions shall achieve 60 dBA Leq. **Figure 12** shows the general location of the crusher and the placement of the required mitigation. Noise measurements shall be conducted once the crusher is in place and noise mitigation is implemented to ensure the 60 dBA Leq requirement is met. If noise levels are found to be above the established thresholds of 60 dBA at any existing single family residential use, 65 dBA for any multifamily use or 70 dBA at a commercial use then additional mitigation in the form of higher barriers, sound absorbing materials or operational limits on the crushers usage will need to be incorporated to meet the required thresholds.

Implementation of mitigation measure MM-N-2 will reduce the crusher noise impact to below a level of significance. Breaking the line of sight from a noise source to a receptor will typically achieve a 5 decibel reduction or better based on elevation offsets (LdN 2014). Therefore, impacts will be mitigated to below a level of significance.

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 expose people residing or working in the project area to excessive noise levels? No Impact

The nearest airport is the McClellan-Palomar Airport in Carlsbad, which is located approximately 6.5 miles west of the project site. At this distance, the airport would not subject future residents or workers in the project area to excessive noise levels due to airport operations. Therefore, no impact is identified.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? No Impact

The project site is not located within the vicinity of a private airstrip. Therefore, no impact is identified for this issue area.

Figure 12. Rock Crusher Mitigation Location

XIII. POPULATION AND HOUSING

a) Induce substantial 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)? Less than Significant Impact

The project proposes the construction of 95 residential units and associated infrastructure. This will result in an approximately 287 new residents. The project is intended to be consistent with the City's Housing Element which encourages the development of a variety of housing opportunities with emphasis on providing housing which meets the special needs of the community. The project proposes residential uses near regional transportation, employment, services, and shopping to promote the interregional relationship between housing and employment. Additionally, the project is proposed in an area of the City that is already developed and is adjacent to existing infrastructure including water/sewer lines and roadways.

The off-site sewer pipe extension that are proposed as part of the project is being sized and extended only to support the project and would not be characterized as growth inducing. Any improvements associated with the project, including resizing of utility lines, has been considered in this analysis. Therefore, a less than significant impact is identified.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? No Impact

There is no existing housing on the project site and the project site is vacant. Thus the project would not result in the displacement of any existing housing. The project proposes 95 residential units and will add to the housing stock in San Marcos. Therefore, no impact is identified for this issue area.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? No Impact

There is no existing housing on the project site and the project site is vacant. Thus the project would not result in the displacement of any people. The project proposes 95 residential units and will add to the housing stock in San Marcos. Therefore, no impact is identified for this issue area.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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:

a) Fire protection? Less Than Significant Impact

The project site would increase demand on fire protection services due to the construction of 95 residential units. The City of San Marcos Fire Department was contacted for their input on the project, including information regarding stations serving the project, current staffing, response times, and other items related to fire protection services. The Fire Department's response is included with the service provider letters in **Appendix L**.

The Fire Protection Plan (FPP), described in greater detail in Section VII(h), above, indicated Station 1, located at 180 West Mission Road, and staffed with one paramedic engine company, one paramedic truck company, and one paramedic ambulance, would be the primary responder to an incident at the project site, with Station 3 responding only if necessary. The FPP estimated the response time from Station 1 to the most northerly on-site residences would be one and a half to two minutes. This response time satisfies the City's emergency response standard of no more than eight minutes for fire apparatus and nine minutes for ambulance.

The San Marcos Fire Department indicated that current staff levels and equipment is adequate to serve the project; however, the Fire Department continues to experience an increase in emergency and non-emergency response and additional resources will be needed in the future. The project would be contained within preexisting Fire Community Facilities District 2001-01, and would contribute toward the future resources needed by the Fire Department through participation in the CFD and payment of fees. Such payments would go towards providing the additional staff and equipment that would be needed by the Fire Department in the future to provide fire protection services. Any incremental effects of the project on fire protection services will be offset by the City requirement for payment of fees to the preexisting CFD. Therefore, impacts related to fire protection services are less than significant.

Additionally, the project will implement the following design features, per Fire Department requirements, as summarized in the Specific Plan and Fire Protection Plan:

- Roadways serving the project shall have a minimum improved paved width of 24 feet with an additional 8 feet to each side for parking. Any other roadway features such as cul-de-sacs and gates must meet the design criteria of the San Marcos Fire Department.
- Knox key boxes shall be installed for emergency access to all structures.
- Any automatic gates are required to have a Knox rapid entry system and emergency vehicle strobe detector.
- Fire hydrants with an adequate water supply must be installed at locations approved by the San Marcos Fire Department. Hydrant spacing shall be 300 feet apart for multi-family areas. For single-family areas, hydrants shall be spaced 600 feet apart.
- Residential structures shall be outfitted with automatic fire sprinklers and alarms per California Building Code 2010 edition and City Ordinance.

b) Police protection? <u>Less Than Significant Impact</u>

The project site would increase demand on police protection services due to the construction of 95 residential units. According to correspondence from the San Diego County Sheriff's Department, the project site would be served by the San Marcos Station located at 182 Santar Place, which is located approximately one-half mile from the project site (Horst 2014). Current staffing levels are adequate to meet current demand. The addition of development associated with this project will result in an increase in demand on police protection services.

Any incremental effects of the project on police protection services will be offset by the City requirement for payment of fees to preexisting Community Facilities District 98-01 for police protection. These fees would provide for additional staff and equipment to assist in the provision of law enforcement services. Therefore, impacts to police protection services are determined to be less than significant.

c) Schools? Less than Significant Impact

The project is located within the service boundary of the San Marcos Unified School District (SMUSD). Existing schools that would serve the project include:

- Richland Elementary School, 910 Borden Road
- Woodland Park Middle School, 1270 Rock Spring Road
- Mission Hills High School, 1 Mission Hills Court

The current enrollment and planned capacity of each of these schools, as of October 3, 2013, is presented below.

School	Enrollment	Permanent Capacity
Richland Elementary School	794	1,125
Woodland Park Middle School	1,254	1,458
Mission Hills High School	2,540	2,565

Based upon correspondence from SMUSD, the student generation rate for multi-family units is 0.5352 students (2014). When this generation rate is applied to the project, it is anticipated that the project would generate 51 students (K-12). The correspondence from SMUSD is included with the service provider letters in **Appendix L.**

As shown above, there is current capacity for these students in the schools that would serve the project. However, SMUSD does note that nearly 30 percent of their current classrooms are portable/relocatable and while the students can be accommodated at the schools nearest to them, there is a District-wide capacity shortage of 3,294 students.

The project applicant will be required to pay school mitigation fees pursuant to California Education Code Section 17620 and Government Code Section 65995. These fees will assist in funding the SMUSD's long-rage plans. Current Level II school fees are $3.79/s.f. for residential. Therefore, impacts to schools are determined to be less than significant.

d) Parks? Less than Significant Impact

The closest community park to the project site is the Civic Center mini-park is located at 3 Civic Center Drive, approximately 0.1 mile south of the project site across Mission Road. This 0.62-acre park includes half of a basketball court, picnic areas, sand volleyball and trail connections. Additionally, the Community Center is located in the same complex. This facility includes 30,000 s.f. of indoor space, a community building, half of a basketball court, a picnic area and trail connections. The closest major community park to the project site is Hollandia Park located at 12 Mission Hills Court, approximately 0.6 mile east of the project site. This 30-acre park includes two lighted softball fields, a lighted multi-purpose field, off-leash dog park, lighted skate park, playground with climbing wall, picnic areas, horseshoe pits, amphitheater and multi-use trails.

Open space within the proposed project area consists of common open space and landscape areas to include water quality detention basins and private open space. Common open space allows the residents of the Specific Plan area to visually enjoy the outdoor areas. A large passive open space area is located in the north-central portion of the Specific Plan Area. Private open space includes all of the open space privately maintained by individual condominium owners, such as yards and

patios. Since the project provides recreational amenities for future residents, impacts are less than significant.

e) Other public facilities? Less than Significant Impact

In Sections XIV(a) through XIV(d), the analysis concluded that the project would have a less than significant impact related to fire protection, police protection, schools and parks. The project would not result in an impact to any other public facilities. Impacts are less than significant.

XV. RECREATION

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

Community parks located near the project site include Civic Center mini-park, the Community Center, and Hollandia Park. Collectively, these facilities provide many recreational opportunities as described in Section XIV(d).

Open space within the proposed project area consists of common open space and landscape areas to include water quality detention basins and private open space. Common open space allows the residents of the Specific Plan area to visually enjoy the outdoor areas. The project applicant will provide amenities within the common areas and the amenity selection will include input from the Park and Recreation Director. A large passive open space area is located in the north-central portion of the Specific Plan Area. Private open space includes all of the open space privately maintained by individual condominium owners, such as yards and patios. Since the project provides recreational amenities for future residents, impacts are less than significant.

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? Less Than Significant Impact

Open space within the proposed project area consists of common open space and landscape areas to include water quality detention basins and private open space. Common open space allows the residents of the Specific Plan area to visually enjoy the outdoor areas. A large passive open space area is located in the north-central portion of the Specific Plan Area. Private open space includes all of the open space privately maintained by individual condominium owners, such as yards and patios.

These passive recreational amenities are included as part of the project description and within the footprint of the proposed project. Any impacts associated with the development of these recreational amenities are considered in this CEQA document. Impacts are less than significant.

XVI. TRANSPORTATION/TRAFFIC

A traffic impact analysis was prepared for the project by RBF Consulting (2014). The complete report is included as **Appendix M** of this document. The traffic impact analysis assumes 95 residential units. The project study area included four intersections and one roadway segment:

Intersections

- Mission Road / San Marcos Boulevard – Woodward Street
- Mission Road / Falcon Place
- Mission Road / Mulberry Drive
- Mission Road / East Project Driveway

Roadway Segment

- Mission Road, from San Marcos Boulevard to Mulberry Drive

The traffic impact analysis considered the following analysis scenarios:

- Existing Conditions
- Existing Plus Project Conditions
- Existing Plus Cumulative Conditions Without Project
- Existing Plus Cumulative Conditions With Project
- Horizon Year 2035 Conditions Without Project
- Horizon Year 2035 Conditions With Project

a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? Less Than Significant Impact

Existing Level of Service

To determine the existing operation of the study intersections, intersection turning movement counts were taken on a typical weekday during the a.m. (7:00 to 9:00 a.m.) and p.m. (4:00 to 6:00 p.m.) peak period in late January 2014. **Table 18** summarizes the existing a.m. and p.m. peak hour intersection levels of service (LOS) of the study intersections based on the existing peak hour intersection volumes and existing intersection geometry. As shown in Table 18, all study intersections currently operate at acceptable LOS (LOS D) or better during the peak hours.

Daily roadway segment LOS were calculated based on the roadway classification and capacity as well as existing average daily traffic ADT volumes. Table 19 presents the results of the existing conditions daily roadway segment LOS analysis. As shown in Table 19, the study roadway segment currently operates at acceptable LOS (LOS D or better).

Table 18. Existing Peak Hour Intersection Conditions

Study Intersection	Existing Conditions	
	AM Delay [(1)] – LOS	PM Delay [(1)] – LOS
Mission Rd / San Marcos Bl-Woodward St	26.1 – C	28.1 – C
Mission Rd / Falcon Pl [(2)]	16.4 – C	10.1 – B
Mission Rd / Mulberry Dr	30.0 – C	24.1 – C

Notes: [(1)] Seconds of delay per vehicle.
[(2)] Unsignalized, minor street stop controlled intersection.

Table 19. Existing Daily Roadway Segment Conditions

Roadway	Location	Class (# Lanes)	LOS E Capacity	Existing Conditions		
				ADT	V/C	LOS
Mission Road	San Marcos Blvd to Mulberry Dr	Arterial Enhanced (6)	60,000	20,145	0.336	A

Project Trip Generation

To determine the trips forecast to be generated by the proposed project, April 2002 SANDAG Trip Generation rates were utilized in accordance with the City of San Marcos and SANTEC/ITE Traffic Study Guidelines. As shown in **Table 20,** the proposed project will generate a net increase of approximately 760 trips per day, which includes approximately 61 a.m. peak hour trips and approximately 76 p.m. peak hour trips.

Table 20. Proposed Project Trip Generation

Land Use	Unit	Daily (per unit)	AM Peak			PM Peak		
			Total	In	Out	Total	In	Out
Condominium	DU	8	8%	20%	80%	10%	70%	30%
Forecast Project Generated Trips								
Land Use	**Size**	**Unit**	**Daily Trips**	**AM Peak**			**PM Peak**		
				Total	**In**	**Out**	**Total**	**In**	**Out**
Condominium	95	DU	760	61	12	49	76	53	23
Total Project Trips			**760**	**61**	**12**	**49**	**76**	**53**	**23**

Source: SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

Existing + Project Conditions Analysis

The existing plus project conditions analysis evaluates the impact of the build-out of the proposed project on the existing roadway network. The addition of project-generated trips is not forecast to result in a change in operating conditions from acceptable to deficient at any of the study intersections. As shown in **Table 21**, consistent with existing conditions, the study intersections are forecast to continue operating at acceptable LOS (LOS D or better) with the addition of traffic generated by the proposed project.

Table 21. Existing Plus Project Peak Hour Intersection Conditions

Study Intersection	Existing Conditions		Existing + Project		Change in Delay [1]	
	AM Delay[1] LOS	PM Delay[1] LOS	AM Delay[1] LOS	PM Delay[1] LOS	AM	PM
Mission Rd / San Marcos Bl. - Woodward St.	26.1 – C	28.1 – C	26.8 – C	28.3 – C	0.7	0.2
Mission Rd / Falcon Pl [2]	16.4 – C	10.1 – B	16.5 – C	10.2 – B	0.1	0.1
Mission Rd / Mulberry Dr	30.0 – C	24.1 – C	30.3 – C	24.3 – C	0.3	0.2
Mission Rd / East Project Driveway [2] [3]	–	–	16.6 – C	10.3 – B	–	–

[1] Seconds of delay per vehicle.
[2] Unsignalized, minor street stop controlled intersection.
[3] There are two project driveways; however, all project trips were assigned to one driveway to provide a more conservative analysis.

The results of the Existing Plus Project conditions daily roadway segment analysis are presented in **Table 22.** Table 22 shows that, consistent with existing conditions, all study roadway segments will continue operating at acceptable LOS (LOS D or better). The calculated increase in the volume-to-capacity (v/c) ratio does not exceed the significant impact threshold of 0.020 for daily roadway segment operations; therefore, a significant impact was not identified on the study segment.

Table 22. Existing Plus Project Daily Roadway Segment Conditions

Roadway	Location	Class (# Lanes)	LOS E Capacity	Existing Conditions			Existing + Project			Change in V/C
				ADT	V/C	LOS	ADT	V/C	LOS	
Mission Road	San Marcos Blvd to Mulberry Dr	Arterial Enhanced (6)	60,000	20,145	0.336	A	20,753	0.346	A	0.010

Cumulative Conditions – With and Without Project Analysis

To determine the cumulative conditions in the project study area, forecast project traffic associated with City of San Marcos approved or pending projects was added to existing traffic volumes. A total of 17 cumulative projects could add traffic to the study area by project opening year (2016). Cumulative project traffic data through the study area is based on information from traffic impact studies. A list of the cumulative project considered in the traffic analysis is included in Appendix M. Cumulative projects are forecast to generate approximately 71,705 trips per day, which includes approximately 5,219 a.m. peak hour trips and approximately 6,914 p.m. peak hour trips.

Cumulative Conditions Level of Service Analysis

Intersection Analysis

Table 23 summarizes the Existing Plus Cumulative conditions peak hour intersection analysis using HCM methodology, without and with the proposed project.

Table 23. Existing Plus Cumulative Peak Hour Intersection Conditions - Without and With Project

Study Intersection	Without Project		With Project		Change in Delay [1]	
	AM Delay [1] LOS	PM Delay [1] LOS	AM Delay [1] LOS	PM Delay [1] LOS	AM	PM
Mission Rd / San Marcos Bl-	27.5 – C	28.9 – C	27.6 – C	29.1 – C	0.1	0.1

Woodward St.						
Mission Rd / Falcon Pl [2]	17.5 – C	10.5 – B	17.6 – C	10.6 – B	0.1	0.1
Mission Rd / Mulberry Dr	36.1 – D	27.4 – C	36.5 – D	27.6 – C	0.4	0.2
Mission Rd / East Project Driveway [2] [3]	–	–	17.7 – C	10.7 – B	–	–

[1] Seconds of delay per vehicle.
[2] Unsignalized, minor street stop controlled intersection.
[3] There are two project driveways; however, all project trips were assigned to one driveway to provide a more conservative analysis.

As shown in Table 23, all study intersections are forecast to operate at acceptable LOS (LOS D or better) both without and with the proposed project. No significant impacts are identified at the study intersections under Existing Plus Cumulative conditions with the proposed project and no mitigation measures are required.

Roadway Segment Analysis

Daily roadway segment levels of service were calculated based on the roadway classification and capacity as well as ADT volumes. **Table 24** presents the results of the Existing Plus Cumulative conditions roadway segment LOS analysis, without and with the proposed project. As shown in Table 24, the study roadway segment is forecast to operate at acceptable LOS (LOS D or better) under Existing Plus Cumulative conditions without and with the proposed project.

Table 24. Existing Plus Cumulative Daily Roadway Segment Conditions - Without and With Project

Roadway	Location	Class (# Lanes)	LOS E Capacity	Without Project			With Project			Change in V/C
				ADT	V/C	LOS	ADT	V/C	LOS	
Mission Road	San Marcos Blvd to Mulberry Dr	Arterial Enhanced (6)	60,000	23,122	0.385	A	23,730	0.395	A	0.010

Horizon Year 2035 Conditions – With and Without Project

The SANDAG Series 11 North San Diego County Sub-Area traffic model for the year 2030 was used to evaluate the 2035 Horizon Year conditions. The Series 11 model used to generate the forecast 2035 volumes includes traffic from several large-scale projects planned in the City such as the University District, Creek District, and Rancho Coronado (Hanson site). The forecast Series 11 2030 traffic volumes were compared to the Series 12 regional model for year 2035, and it was revealed that the Series 11 model provides a more conservative and accurate analysis of Horizon Year 2035 conditions.

The forecast Horizon Year 2035 daily volumes were post-processed by RBF to develop peak hour intersection volumes. The Horizon Year 2035 peak hour volumes were generated using the forecast growth from existing conditions to 2035. Adjustments were made where appropriate to reflect changes in traffic patterns and growth for all study intersections.

Horizon Year 2035 Conditions Level of Service Analysis

Intersection Analysis

The results of the Horizon Year 2035 intersection LOS analysis are summarized in **Table 25.**

Table 25. Horizon Year 2035 Peak Hour Intersection Conditions - Without and With Project

Intersection	Without Project		With Project		Change in Delay [1]	
	AM Delay[1] LOS	PM Delay[1] LOS	AM Delay[1] LOS	PM Delay[1] LOS	AM	PM
Mission Rd / San Marcos Bl-Woodward St.	28.3 – C	30.4 – C	28.4 – C	30.6 – C	0.1	0.2
Mission Rd / Falcon Pl (2)	22.2 – C	12.1 – B	22.2 – C	12.1 – B	0.0	0.0
Mission Rd / Mulberry Dr	46.6 – D	30.4 – C	47.2 – D	30.6 – C	0.6	0.2
Mission Rd / East Project Driveway [2] [3]	–	–	22.1 – C	12.3 – B	–	–

[1] Seconds of delay per vehicle.
[2] Unsignalized, minor street stop controlled intersection.
[3] There are two project driveways; however, all project trips were assigned to one driveway to provide a more conservative analysis.

As shown in Table 25, all study intersections are forecast to operate at acceptable LOS (LOS D or better) under Horizon Year 2035 Conditions both without and with the proposed project. Therefore, no significant impacts are identified at the study intersections under Horizon Year 2035 Conditions and no mitigation measures are required.

Roadway Segment Analysis

Daily roadway segment LOS was calculated based on the roadway classification and capacity as well as ADT volumes. **Table 26** presents the results of the Horizon Year 2035 Conditions roadway segment LOS analysis, without and with the proposed project.

As shown in **Table 26**, the study roadway segment is forecast to operate at acceptable LOS (LOS D or better) under Horizon Year 2035 conditions without and with the proposed project. Therefore, a significant impact was not identified on the study segment.

Table 26. Horizon Year 2035 Daily Roadway Segment Conditions - Without and With Project

Roadway	Location	Class (# Lanes)	LOS E Capacity	Without Project			With Project			Change in V/C
				ADT	V/C	LOS	ADT	V/C	LOS	
Mission Road	San Marcos Blvd to Mulberry Dr	Arterial Enhanced (6)	60,000	31,283	0.521	B	31,891	0.532	B	0.010

Site Access and Internal Circulation

The proposed Mission 316 project will take access from two driveways along Mission Road located between Woodward Street and Falcon Place. The project driveway intersections will be stop sign controlled at the driveway approaches. The project will include constructing a center median break on Mission Road to provide an eastbound left-turn lane for inbound access into the easterly project driveway. Outbound project trips will be restricted to right-turns exiting the project driveway. The second project driveway will be restricted to right-turn in/out access. Outbound driveway trips heading east on Mission Road would need to u-turn at the signalized intersection of Mission Road /

San Marcos Boulevard-Woodward Street. U-turning project trips were included in the analysis at this intersection.

Although there are two driveways according to the project site plan, all project trips were assigned to one driveway to provide a more conservative analysis of the project access point. Based on the results of the HCM intersection analysis, the project driveway intersection is forecast to operate acceptable LOS (LOS D or better) during the peak hours through the year 2035. Therefore, no operational impacts are anticipated at the project driveway intersection.

Gap Analysis

A gap analysis was conducted during the a.m. and p.m. peak periods to determine if sufficient gaps in traffic on westbound Mission Road would be available without excessive delay or queuing for left-turn movements from the proposed eastbound left-turn lane into the easterly project driveway. The gap analysis methodology is presented in Chapter 19 of the 2010 Highway Capacity Manual (HCM). Based on the HCM methodology, the minimum acceptable gap for a left-turn movement from a six-lane major roadway is 7.5 seconds (5.3 seconds of critical gap time + 2.2 seconds of follow-up time). Critical gap time is the minimum time needed for the first vehicle in the queue to complete the left-turn movement. Follow-up time is the minimum time needed for the second vehicle in the queue to follow the first vehicle when a gap in traffic occurs.

Table 27 summarizes the results of the gap analysis for the eastbound left-turn lane at the proposed Mission Road / East Project Driveway intersection.

Table 27. Gap Analysis For Project Driveway Eastbound Left-Turn Lane

Peak Hour	8-11 sec.		11-15 sec.		15-20 sec.		30-40 sec.		40-50 sec.		Total Vehicles
	# of Gaps	# of Vehicles	# of Gaps	# of Vehicles	# of Gaps	# of Vehicles	# of Gaps	# of Vehicles	# of Gaps	# of Vehicles	
AM	4	8	2	8	1	6	-	-	-	-	**22**
PM	9	18	1	4	-	-	2	30	2	40	**92**

Note: Gap observations conducted by Linscott, Law and Greenspan Engineers on Thursday, September 12, 2013.

Only gaps of 8 seconds or more were recorded during the a.m. and p.m. peak hour observations. As shown in Table 27, the observed gaps were grouped into the following ranges based on the number of left-turning vehicles allowed during each gap range:

- 8-11 seconds: 2 left-turning vehicles
- 11-15 seconds: 4 left-turning vehicles
- 15-20 seconds: 6 left-turning vehicles
- 30-40 seconds: 15 left-turning vehicles
- 40-50 seconds: 20 left-turning vehicles

Assuming that 80 percent of inbound project trips would be using the proposed eastbound left-turn lane to enter the project site, a total of 10 vehicles would make a left-turn during the a.m. peak hour, and 42 vehicles would make a left-turn during the p.m. peak hour. Table 27 shows that there are sufficient gaps to allow 22 left-turning vehicles during the a.m. peak hour, and the gaps during the p.m. peak hour would allow a total of 92 left-turning vehicles. Therefore, the findings of the gap analysis show that sufficient gaps would be available for left-turning vehicles entering the east project driveway.

Based on the findings of the analysis and a review of the project site plan, no operational impacts are anticipated at either of the project driveways.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? Less Than Significant Impact

Queuing Analysis

A queuing analysis was conducted during the a.m. and p.m. peak hours for the proposed eastbound left-turn lane at the Mission Road / East Project Driveway intersection. It is estimated that approximately 80% of the inbound project trips would use the eastbound left-turn lane to enter the project site. Approximately 10 a.m. peak hour trips and 42 p.m. peak hour trips are estimated to use the eastbound left-turn lane into the project site.

The SYNCHRO software program was utilized to conduct the queuing analysis, which reports 95th percentile (maximum) queue lengths for unsignalized intersections. The queuing analysis was conducted for all analysis scenarios with the proposed project. According to the project site plan, a storage length of approximately 100 feet will be provided for the eastbound left-turn lane at the Mission Road / East Project Driveway intersection. The results of the queuing analysis for the eastbound left-turn lane into the project site are presented in **Table 28**.

Table 28. Peak Hour Intersection Queuing Analysis
Mission Road / East Project Driveway Eastbound Left-Turn Lane

Movement	# Lanes	Storage Length (feet)	AM Peak Hour		PM Peak Hour	
			Volume	95% Queue (feet)	Volume	95% Queue (feet)
Existing Plus Project Conditions						
Eastbound Left-Turn	1	100'	10	3 [(1)]	42	5 [(1)]
Existing Plus Cumulative Plus Project Conditions						
Eastbound Left-Turn	1	100'	10	3 [(1)]	42	5 [(1)]
Horizon Year 2035 With Project Conditions						
Eastbound Left-Turn	1	100'	10	4 [(1)]	42	6 [(1)]

[(1)] Reported queues of 20 feet or less typically represent a queue length of only one vehicle.

As shown in Table 28, the reported queue lengths during the peak hours are nominal and represent only one queued vehicle at any one time for all analysis scenarios. Impacts would be less than significant.

Construction Truck Traffic Evaluation

This section evaluates the construction truck materials import activities and the trips associated with the grading of the proposed project site. The purpose of this evaluation is to determine if the estimated truck trips associated with the material import activities would potentially result in traffic impacts during the peak hours.

According to the information provided to RBF, grading operation associated with the project includes a total of approximately 20,000 cubic yards (cy) of earthwork materials to be exported from

the site. The estimated duration of materials export is 30 days. Based on the information described above, **Table 29** presents a summary of the truck export activities.

Table 29. Summary of Construction Truck Export Activities

Project Duration (Days)	Total Cubic Yards	Cubic Yards Per Day	Loads Per Day [(1)]	Loads Per Hour [(2)]	Truck Trips Per Day	Truck Trips Per Hour
30	20,000	667	44	5	88	10

Notes: (1) Calculation is based on a truck capacity of 15 cubic yards per load.
(2) Hourly loads is based on truck hauling operations occurring for 9 hours each day, assuming a schedule from 7:00 a.m. to 5:00 p.m. with a one-hour lunch.

As shown in Table 29, it is estimated that approximately 667 cy of material per day would be exported from the site. Assuming a truck capacity of 15 cy per load, approximately 44 loads per day would be exported from the project site. Assuming each load results in one inbound and one outbound truck trip, it is estimated a total of 88 truck trips per day would occur.

The materials import operation would take place on weekdays from Monday through Friday. Trucks are assumed to enter the site at approximately 7:00 a.m., and the last trucks are expected to exit the site by approximately 5:00 p.m. It is assumed that truck hauling activities would occur for nine hours each day, with one hour off for a lunch break. Based on the hours of operation and the estimated number of daily truck trips (88), it is estimated that approximately 10 truck trips per hour would occur. It is assumed that truck trips per hour would remain constant throughout the day with the exception of a one hour lunch break.

Since trucks tend to have a more significant effect on roadway operations when compared to passenger vehicles, passenger car equivalency factors (PCEs) were applied to convert truck traffic to passenger vehicle equivalents. As specified in the Highway Capacity Manual (HCM) 2000, heavy, multi-axle trucks should use a PCE factor of 2.0. Therefore, the project truck trips calculated in this analysis were multiplied by 2.0 to derive traffic levels in PCEs.

Table 30 summarizes the estimated total daily and hourly trip generation associated with the truck import activities, which includes the PCE factor described above. As shown in Table 30, the truck hauling activities would generate a total of 176 truck PCE trips per day, with 20 truck PCE trips occurring during the a.m. peak hour and 20 truck PCE trips occurring during the p.m. peak hour.

Table 30. Truck Export Activities PCE Trip Generation

Trip Type	Daily Trips	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out
PCE Truck Trips *	176	20	10	10	20	10	10

*Passenger Car Equivalency (PCE) factor of 2.0 applied to the truck trips.

Truck trips associated with the materials export activities will enter and exit the site from Mission Road, most likely from and to the SR-78 / Twin Oaks Valley Road freeway interchange located southwest of the project site. Prior to any construction activities associated with proposed project, the applicant shall submit a haul route plan for review and approval by the City Engineer. This requirements is also included in Table 1 as a project design feature.

The analysis presented earlier in this document concluded that the intersection of Mission Road / San Marcos Boulevard-Woodward Street currently operates at LOS C during the peak hours, and is forecast to continue operating at LOS C through the year 2035.

The proposed 95 condominiums are forecast to generate approximately 61 a.m. peak hour trips and approximately 76 p.m. peak hour trips. The estimated number of truck PCE trips is only 20 trips during the peak hours, which is significantly less than the trips generated by the project when completed. In conclusion, since the study intersections will operate at LOS D or better under all analysis scenarios, construction truck traffic impacts associated with the truck export activities are expected to be less than significant during the peak hours or any other time throughout the day.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? No Impact

The project site is located approximately 6.5 miles east of McClellan-Palomar Airport. Given the type of development proposed (residential), as well as the project's distance from the airport, the project will not result in a change in air traffic patterns. Therefore, no impacts are identified for this issue area.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Less than Significant with Mitigation Incorporated

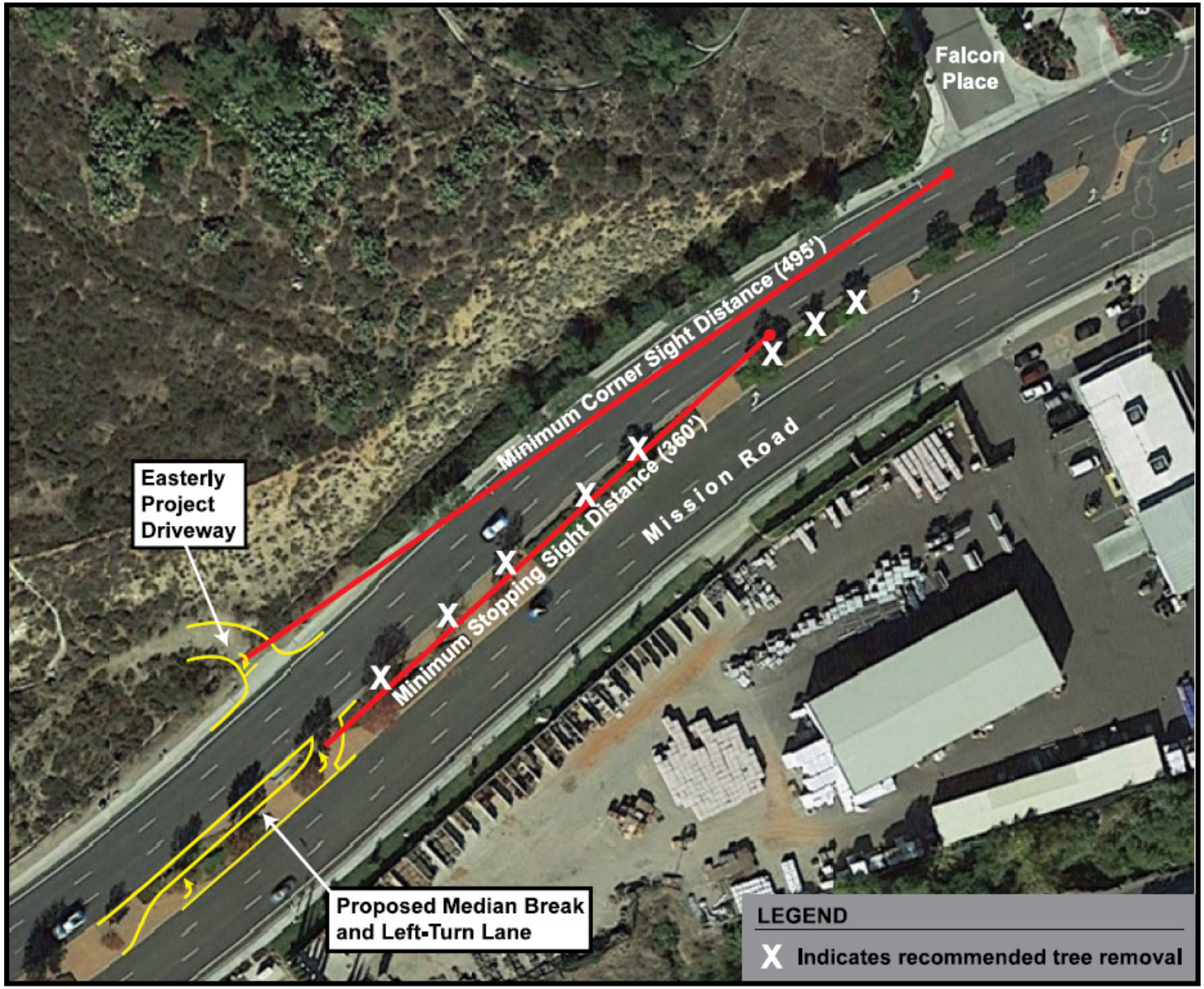
RBF evaluated the sight distance at the two proposed project driveway intersections along Mission to determine if adequate sight distance would be provided for vehicles entering and exiting the project site. Mission Road is a six-lane arterial and a horizontal curve exists on Mission Road along the project site frontage.

The westerly project driveway would be restricted to right-turn in/right-turn out access, and the easterly project driveway would allow inbound left-turns but would be restricted to right-turns exiting the site. The minimum intersection corner sight distance is addressed for the right-turning vehicles exiting both driveways, and the minimum stopping sight distance is addressed for left-turning vehicles entering the easterly driveway. Since the two project driveways are located along the north side of Mission Road, this sight distance evaluation only addresses sight distance looking east on Mission Road from the two project driveway locations.

Mission Road has a posted speed limit of 45 miles per hour (MPH) in both directions of travel. According to Table 405.1A of the Caltrans *Highway Design Manual* (2012), the minimum corner sight distance for a design speed of 45 MPH is 495 feet. Table 201.1 of the Caltrans *Highway Design Manual* (2012) shows that the minimum stopping sight distance for a design speed of 45 MPH is 360 feet.

Figure 13 presents the minimum required corner and stopping sight distance at the Mission Road / East Project Driveway intersection. Figure 13 also shows that adequate corner sight distance is available for right-turning vehicles exiting the easterly project driveway. However, as shown in Figure 13, existing trees in the median of Mission Road limit visibility and the minimum required stopping sight distance is not met. This represents a significant impact (**Impact TR-1**) and mitigation is required.

Figure 13. East Project Driveway Site Distance



MM-TR-1 All trees in the median of Mission Road affected by the design of the turning lane and the line of sight distance shall be addressed by the applicant/developer. Prior to removal, the applicant/developer shall deposit sufficient funds allowing the City to hire a Certified Arborist to assess the value of trees and replacement ratio. Pending the Arborist's report, the City shall determine the feasibility of relocating the affected trees or an appropriate replacement ratio and size for the replacement of the trees at the cost of the applicant/developer. The applicant/developer shall be responsible for tree removal prior to any construction related to the median improvements. Finally, the project applicant/developer shall replace all affected landscaping in the median. Proposed replacement landscaping selections for the median shall be reviewed and approved by the Department of Public Works. The replacement landscaping shall be maintained to a height not to exceed 36 inches.

e) Result in inadequate emergency access? Less Than Significant Impact

The project provides adequate emergency access. Street widths meet the requirements of the San Marcos Fire Department and there are multiple entry points into the residential community. Construction of the proposed project will not result in the closure of any roads that would impede emergency access. The offsite sewer improvements in Mission Road can be completed without fully closing down the roadway. Therefore, impacts are less than significant.

f) Result in inadequate parking capacity? Less Than Significant Impact

Each residential unit in the project will have a two-car garage. Additionally, the Specific Plan mandates one guest parking space for every four dwelling units, which would require a minimum of 23 guest parking spaces. Therefore, adequate parking is proposed as part of the project and impacts are less than significant.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? No Impact

Existing and Future Bicycle and Pedestrian Access

There are currently Class II bike lanes in each direction of travel on Mission Road along the project frontage. From Mission Road, cyclists can access the Class I Inland Rail Trail bike path that currently extends from the intersection of Mission Road / Pacific Street to I-15 in Escondido. The project would retain the bike lane along Mission Road in front of the project site and would not result in any impact to bicyclists.There are currently sidewalks on both sides of Mission Road. From the project site, existing sidewalks provide pedestrian access to nearby destinations such as the City of San Marcos Civic Center, the Civic Center SPRINTER station, and the Civic Center Plaza retail center. The project would retain the sidewalk along the project frontage and would not result in any impacts to pedestrians.

Transit Access

There is currently one bus stop provided in each direction of travel on Mission Road within walking distance (1/4 mile or less) of the proposed project site. The bus stop serves North County Transit District (NCTD) Route 305, which extends from the Vista Transit Center to the Escondido Transit Center via South Santa Fe Avenue and Mission Road. Route 305 provides service from 4:15 a.m. to 11:45 p.m. Monday through Friday, with headways every 30 minutes through most of the day.

Figure 14. West Project Driveway Site Distance

The Civic Center SPRINTER station is located approximately 1/4 mile from the proposed project site, which is considered a reasonable walking distance to access transit. The SPRINTER rail line extends from the Oceanside Transit Center to the Escondido Transit Center, with stations located near major destinations such as downtown Vista, the City of Vista Civic Center, Palomar College, the City of San Marcos Civic Center, California State University San Marcos, and downtown Escondido. The SPRINTER provides service every 30 minutes from 4:00 a.m. to 9:00 p.m. Monday through Friday, and once every 60 minutes from 10:00 a.m. to 6:00 p.m. on Saturday, Sunday and holidays.

The proposed project does not conflict with any plans, policies, or programs supporting alternative transportation. Therefore, no impact is identified for this issue area.

XVII. UTILITIES AND SERVICE SYSTEMS

A Water and Sewer Study was prepared for the project by Vallecitos Water District (2014). The complete report is included as **Appendix N** of this document.

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Less Than Significant Impact

The project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Impacts are less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Less Than Significant Impact

Water Facilities Analysis

Water Distribution Infrastructure Analysis – The project is within the boundaries of the Vallecitos Water District (VWD) for water service. The project lies completely within VWD's 920 Pressure Zone. The project will connect to existing VWD facilities, specifically an 8-inch main in Mission Road. The water modeling conducted by VWD concluded that under average day demand, maximum day demand, and peak hour demand conditions the project would not result in any new distribution system deficiencies. Therefore impact to water distribution infrastructure would be less than significant.

Water Storage Analysis - Based upon the Water and Sewer Study prepared for the project (VWD 2014) the project will increase water demand. Under the planned use in the 2008 VWD Master Plan (commercial) the site would have a water demand of 13,290 gallons per day (gpd). Under the proposed development, the project would have a water demand of 21,860 gpd. This represents an increase of approximately 8,570 gpd.

Potable water storage within VWD is sized for operational, emergency, and fire flow storage. This increase in water demand will result in increase of potable water storage demand capacity by 42,850 gallons. The project will pay Water Capital Facility Fees per VWD Ordinance No. 175. This requirement is also noted in Table 1. These fees will be used by VWD to expand water storage facilities, as needed, within their service area. VWD considers payment of the Water Capital Facility Fees as mitigation for the increase in water storage demand. Therefore, impacts are less than significant.

Water Pump Station Analysis **-** Based upon the Water and Sewer Study for the project (VWD 2014) pump stations are sized to supply minimum day flows while meeting all pressure criteria within their service area. Since the proposed project is located in a pressure zone that is not served by pumping, there are no pump station requirements for the project. Thus, no impact is identified related to water pump stations.

Wastewater Facilities Analysis

The project site is within the boundaries of VWD for sewer service and lies completely within VWD sewer shed 24C. The project would construct an 8-inch sewer main from the development to an existing 8-inch sewer main at Falcon Place.

Based upon the Water and Sewer Study prepared for the project (VWD 2014) the project will increase wastewater flows. Under the current allowable use in the 2008 VWD Master Plan (light industrial) the site would have an expected wastewater flow of 10,632 gpd. Under the proposed development, the project would have a wastewater flow of 16,200 gpd. This represents an increase in wastewater flows of approximately 5,568 gpd.

Wastewater Collection System Analysis **-** The Water and Sewer Study (VWD 2014) concluded that wastewater flow from the project would not result in any deficiencies under peak dry or wet weather flows during ultimate build-out conditions. Therefore impacts are less than significant.

Wastewater Lift Station Analysis **-** Lift stations are sized for peak wet weather flow. Since the project site is not located in a sewer shed that is served by a lift station (Lift Station No. 1 is a stripping station and does not meet this definition) or requires a lift station, there are no lift station upgrade requirements for the project. Thus no impact is identified.

Parallel Land Outfall Analysis **-** VWD's existing outfall is approximately eight miles in length and consists of four gravity pipeline sections and three siphon sections varying from 20 to 54 inches. VWD maintains the entire pipeline from Lift Station No. 1 to the Encina Pollution Control Facility (EWPCF). VWD is currently considering two scenarios for increasing wastewater flows from planned developments within their service area. The first option is constructing a peak flow storage area near Lift Station No. 1. The second option is to convey peak flows to the EWPCF through a parallel land outfall.

The project will pay Wastewater Capital Facility Fees per VWD Ordinance No. 176 and Wastewater Density Impact Fees per VWD Ordinance 177. This requirement is also noted in Table 1. These fees will be used by VWD to help fund the parallel land outfall expansion. VWD considers payment of the fees as mitigation for the increase in the need for land outfall capacity. Therefore, impacts are less than significant.

Wastewater Treatment Facility Analysis **-** VWD uses two wastewater treatment facilities to treat wastewater that is collected within its sewer service area: the MRF and the EWPCF. The project will increase the wastewater flows from the project site by approximately 5,568 gpd. VWD is already projected to experience ultimate solids handling, liquids handling and ocean disposal capacity deficiencies.

The project will pay Wastewater Capital Facility Fees per VWD Ordinance No. 176 and Wastewater Density Impact Fees per VWD Ordinance 177. This requirement is also noted in Table 1. These fees will be used by VWD to help fund the expansion and/or construction of wastewater treatment

facilities to handle increase wastewater quantities. VWD considers payment of the fees as mitigation for the increase in treatment need. Therefore, impacts are less than significant

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Less Than Significant Impact

Storm water run-off will be treated in accordance with the Regional Water Quality Control Board's (RWQCB) current permit. A Water Quality Improvement Plan, WQIP, prepared for the development, specifies source control BMP's, low impact development designs, LID, and treatment BMP's to be used. Bioretention basins and porous pavers distributed around the site will act as treatment control BMP's. The bio-retention basins and porous paver base materials will also serve to satisfy the RWQCB's requirements for hydromodification.

The storm drain system will consist of two components. The first component will collect onsite runoff through area drains, grated and curb inlets and convey flows to the bioretention basin located along the Mission Road frontage. The bioretention basin will serve to clean the runoff and provide hydro modification, in accordance with the most current RWQCB permits. Flows from the basins will drain to the public system along the Specific Plan area's frontage along Mission Road. The second storm drain component will convey flows from uphill of the development to the existing storm drain in Mission Road. Offsite runoff will not comingle with onsite flows until downstream of the water quality basins. All proposed storm drain improvements will be within the project development footprint and are considered in this environmental analysis. Impacts will be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed? Less Than Significant Impact

VWD's 2008 Master Plan assumed that the project site would be developed with commercial uses and assumed a water demand of 13,290 gallons per day (gpd). Under the proposed development, the project would have a water demand of 21,860 gpd. This represents an increase of approximately 8,570 gpd. The Water and Sewer Study (VWD 2014) did not indicate any impacts related to water supply. Therefore, impacts are less than significant.

e) 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? Less Than Significant Impact

As analyzed in Section XVII(b), due to an increase in density, the project will increase the demand for wastewater treatment as well as land outfall capacity. As noted in Section XVII(b), the project will pay Wastewater Capital Facility Fees per VWD Ordinance No. 176 and Wastewater Density Impact Fees per VWD Ordinance 177. This requirement is also noted in Table 1. These fees will be used by VWD to help fund the expansion and/or construction of wastewater treatment facilities to handle increased wastewater quantities and also the expansion of land outfall facilities. VWD considers payment of the fees as mitigation for the increase in treatment need. Therefore, impacts are less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Less than Significant Impact

Solid waste service in the City is provided by a private franchise hauler, EDCO Waste and Recycling (EDCO), which handles all residential, commercial and industrial collections within the City. Waste collected by EDCO is hauled to the Escondido Resources Recovery Transfer Station where it is then transported to the Sycamore Sanitary Landfill in Santee.

The Escondido Transfer Station accepts mixed municipal waste, green materials, and construction/demolition materials. It has a daily capacity of 2,500 tons with a permitted capacity of 5,249 tons/day (CalRecycle 2014a). The Sycamore Sanitary Landfill has a daily permitted capacity of 3,800 tons/day of solid waste, with an anticipated closure date of 2031 (CalRecycle 2014b).

The Specific Plan identifies a trash bin, recycling bin, and green waste bin for each condominium unit. Based upon typical generation rate of 0.44 tons/unit/year, the 126 residential units proposed by the project are expected to generate 41.8 tons/year of solid waste. This does not consider any waste diversion through recycling. It is expected that 50 percent of this total volume will be diverted from the landfill through recycling, thus the volume going to the landfill is expected to be 20.9 tons/year or 0.057 tons/day.

Currently, approximately 2,380 tons of waste enters the Sycamore Canyon Landfill each day (City of San Diego 2013). Therefore, there is approximately 1,585 tons/day of capacity at the landfill. Thus, the project's contribution of 0.08 tons/day would be a less than significant impact.

g) Comply with federal, state, and local statutes and regulations related to solid waste? No Impact

The project will comply with all federal, state and local statutes and regulations related to solid waste, including proper handling of construction and demolition debris. Thus no impact is identified for this issue area.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? Less Than Significant Impact With Mitigation Incorporated

The project site support Diegan coastal sage scrub, which is a sensitive vegetation community. The project will impact ~~3.61~~3.81 acres of Diegan coastal sage scrub. Implementation of mitigation measures MM-BIO-1, which requires mitigation at a 1:1 ratio for impacts to Diegan coastal sage scrub. Mitigation will be in the form of ~~onsite~~ preservation within the City of San Marcos, a purchase of credits from an approved mitigation bank, or a combination thereof as approved by the Planning Director. This mitigation will reduce impacts to sensitive vegetation communities to below a level of significance. One sensitive species, the orange-throated whiptail, was observed on the project site. Implementation of the proposed project would impact this small population of orange-throated whiptail, requiring mitigation. Mitigation for this species is handled through mitigation for the

habitat in which is occurs. No species-specific mitigation is required. Accordingly, implementation of MM-BIO-1 will also reduce impacts to orange-throated whiptail to below a level of significance. Finally, the project has the potential to impact nesting raptors and birds if construction occurs during the bird breeding season. Implementation of mitigation measures MM-BIO-2 and MM-BIO-3 will reduce this potential impact to below a level of significance by requiring pre-construction surveys and avoidance measures if nesting birds are identified. Thus, implementation of the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

A cultural resources study was prepared for the project and did not identify any resources on the site. Mitigation measures MM-CR-1 MM-CR-8 are included as a condition of project approval. These measures require the presence of an archaeological monitor and a Native American monitor during project grading in case any subsurface resources are identified. Provision of these monitors will reduce the potential for impacts to eliminate important examples of the major periods of California history or prehistory to below a level of significance. Therefore, this project has been determined not to meet this Mandatory Finding of Significance and impacts are less than significant with the incorporation of mitigation.

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

Cumulative impacts related to traffic, air quality, greenhouse gas, and noise were analyzed in this CEQA document. Based upon the analysis, the project will not have any cumulative impact related to air quality, noise, and traffic.

All other impacts were site-specific (e.g., cultural resources and noise) and will not result in a significant cumulative impact. Therefore, this project has been determined not to meet this Mandatory Finding of Significance and impacts are less than significant with the incorporation of mitigation.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? Less Than Significant Impact with Mitigation Incorporated

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in Sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX. Hydrology and Water Quality, XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. All impacts in these environmental issue areas are less than significant or mitigated to below a level of significance. Therefore, this project has been determined not to meet this Mandatory Finding of Significance and impacts are less than significant with the incorporation of mitigation.

V. DOCUMENT PREPARERS

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

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VII. MITIGATED NEGATIVE DECLARATION

City of San Marcos

The following Mitigated Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Public Review Period: September 15, 2014 to October 15, 2014

Project Name: Mission 316 Specific Plan

Project Applicant: Integral Communities, 2235 Encinitas Boulevard, Suite 216, Encinitas, CA 92024

Project Location: The project site for the Mission 316 Specific Plan is located in the City of San Marcos in North San Diego County, generally north of Mission Road between Woodward Street and Falcon Place. Specifically, the project site is bounded on the west and east by undeveloped land, on the north by existing residential and disturbed open space, and on the south by Mission Road.

Project Description: The Mission 316 project proposes an attached residential condominium project of 95 residential units (Figure 2 – Residential Site Development Plan). The project is proposed to be constructed as a single-phase development.

Attached Residential - The project proposes 95 attached multi-family condominium homes across 21 condominium buildings. The homes will range from approximately 1,400 square feet (s.f.) to 1,990 s.f. and feature two or three bedrooms, depending on the home plan and layout. The attached homes will be three stories with a maximum building height of 45 feet.

Parking – A total of 206 parking spaces are proposed as part of the project. This includes two garage spaces for each residential unit (184 spaces) plus an additional 22 guest parking spaces.

Open Space – A total of 5.27 acres of common and landscaped open space areas are proposed within the Specific Plan area. Over half of this total provides passive open space to be used by residents. Private patios and a bio-retention area comprise the remaining square footage.

Proposed Roadways – There are two access points to the project site from Mission Road. The internal road widths are generally 24 feet wide.

Utility Infrastructure – The project will connect to existing Vallecitos Water District (VWD) infrastructure for water and wastewater service. VWD has an existing water connection and will provide service to the site through existing lines in Mission Road. Onsite water circulation will be through a network of 3- or 4-inch pipes. A separate fire system within the plan area will be fed from an 8-inch public fire main. An 8-inch underground fire service main will serve the building sprinklers and hydrants on the project site.

VWD maintains an existing sewer lines on Mission Road and Falcon Place, approximately 435 feet east of the project site. As part of the project a segment of 8-inch sewer pipeline will be constructed to connect the project site with existing infrastructure in Falcon Place.

Water Quality Management – The project includes a comprehensive water quality management approach. The project incorporates bioretention features of various sizes for water quality and hydrology purposes. A total of 7,174 s.f. of bioretention areas are proposed on the project site. Additionally, the project will implement a variety of source control Best Management Practices (BMPs) to minimize the potential for pollutants such as sediment, trash, metals, bacteria, oil/grease and organics to reach the storm drain and off-site waterways.

***Grading* –** Grading for the project includes 56,500 cubic yards (cy) of cut and36,500 cy of fill with 20,000 cy of export. These grading quantities include adjustments for bulking, remedial work, and street and building undercuts. The export is expected to last for 45 work days, with approximately 100 truck trips per work day. A haul route permit from the City will be required for the import.

VIII. FINDINGS

This is to advise that the City of San Marcos, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environmental and is proposing this Mitigated Negative Declaration based upon the following findings:

☐ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☒ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance. Mitigation proposed for the project includes:

MM-BIO-1 Permanent impacts to 3.81 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.81 acres of Tier II habitat shall be mitigated through either preservation in the City of San Marcos, a purchase of credits from an approved mitigation bank, or a combination thereof, as approved by the Planning Director.

~~**MM-BIO-1** Permanent impacts to 3.61 acres of Diegan coastal sage scrub shall be mitigated at a 1:1 ratio. A total of 3.61 acres of Tier II habitat shall be preserved through on-site preservation, a purchase of credits from an approved mitigation bank, or a combination thereof as approved by the Planning Director.~~

MM-BIO-2 If grading is scheduled to occur during the raptor breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist for active nests shall be completed prior to construction activities. If active nests are identified, additional mitigation in conformance with the City's Biology Guidelines shall be implemented to the satisfaction of the City and wildlife agencies (i.e., appropriate buffers, monitoring schedules, etc.). Within three months following the completion of any required monitoring, two copies of the Final Biological Monitoring Report and/or evaluation report which describes the results, analysis, and conclusions of the Biological Monitoring Program shall be submitted to the City and wildlife agencies. The report shall address findings of active/inactive nests and any recommendations for retention of active nests, removal of inactive nests, and mitigation for offsetting loss of breeding habitat.

MM-BIO-3 During the avian breeding season (February 1 through September 15), preconstruction surveys conducted by a qualified biologist shall occur prior to issuance of grading permits or removal of trees. If active nests are identified, construction activities shall adhere to appropriate noise buffer zone restrictions. The

buffer shall be maintained until the qualified biologist determines that any young birds have fledged. Written results of such surveys shall be submitted to and be approved by City staff and wildlife agencies.

MM-CR-1 A qualified archeological monitor and a Luiseño Native American monitor shall be present during all earth moving and grading activities to assure that any potential cultural resources, including tribal, found during project grading be protected.

MM CR-2 Prior to beginning project construction, the Project Applicant shall retain a San Diego County qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to cultural resources evaluation, which shall include archaeological documentation, analysis and report generation and take into account tribal customers and traditions.

MM-CR-3 At least 30 days prior to beginning project construction, the Project Applicant shall enter into a Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a Luiseño Tribe. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site.

MM-CR-4 Prior to beginning project construction, the Project Archaeologist shall file a pre-grading report with the City to document the proposed methodology for grading activity observation, which will be determined in consultation with the contracted Luiseño Tribe referenced in MM-CR-3. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in MM-CR-3, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation the Luiseño Native American monitor in order to evaluate the significance of any archaeological resources discovered on the property. Tribal and archaeological monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities, and shall also have the authority to stop and redirect grading activities.

MM-CR-5 The landowner shall relinquish ownership of all cultural resources collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site to the appropriate Tribe for proper treatment and disposition per the Cultural Resources Treatment and Monitoring Agreement referenced in MM-CR-3. All cultural materials that are deemed by the Tribe to be associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

In the event that curation of cultural resources is required, curation shall be conducted by an approved facility and the curation shall be guided by California State Historic Resource Commissions Guidelines for the Curation of Archaeological Collections. The City of San Marcos shall provide the developer final curation

language and guidance on the project grading plans prior to issuance of the grading permit, if applicable, during project construction.

MM-CR-6 All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.

MM-CR-7 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Suspected Native American remains shall be examined in the field and kept in a secure location at the site. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. The NAHC must then immediately notify the "most likely descendant(s)" of the discovery. The most likely descendants(s) shall then make recommendations within 48 hours, and engage in consultation concerning treatment of remains as provided in Public Resources Code 5097.98.

MM-CR-8 If inadvertent discoveries of subsurface archaeological/cultural resources, not included human remains or associated burial goods which is addressed in MM-CR-7, are discovered during grading, the Developer, the project archaeologist, and the Luiseño Tribe under agreement with the landowner described in MM-CR-3 shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological resources. If the Developer, the project archaeologist and the Tribe cannot agree on the significance of mitigation for such resources, these issues will be presented to the Planning Director for decision. The Planning Director shall make a determination based upon the provisions of the California Environmental Quality Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Tribe. Notwithstanding any other rights available under law, the decision of the Planning Director shall be appealable to the Planning Commission and/or City Council.

MM-N-1 A 4-foot high noise barrier shall be required for second floor balconies of the units along Mission Road as shown in **Figure 11**. The barriers shall be constructed of non-gapping materials such as masonry stone, ¼ inch-thick glass, Plexiglass, or a combination of these materials architecturally integrated with the project. Verification of the type of noise reduction barrier material shall be provided to the Planning Director for review and approval prior to grading permit issuance. The barrier shall reduce the exterior noise levels to comply with the City of San Marcos Noise standards of 65 dBA CNEL at the multi-family residences and any outdoor usable areas. Afinal noise assessment shall be prepared prior to the issuance of the first building permit. This final report would identify the interior noise requirements based upon architectural and building plans to meet the City's established interior noise limit of 45 dBA CNEL.

MM-N-2 Noise mitigation will be required for the crusher to break line of site from the crusher to nearby residences. Shielding can be achieved through an earthen berm, 5/8-inch plywood, 1-inch acoustical blankets, or a combination of these strategies. Earthen berm and/or plywood shall be one to two feet above the top of the crushing equipment to break line-of-site between the crusher and off-site residences. The reductions shall achieve 60 dBA Leq. **Figure 12** shows the general location of the crusher and the placement of the required mitigation. Noise measurements shall be conducted once the crusher is in place and noise mitigation is implemented to ensure the 60 dBA Leq requirement is met. If noise levels are found to be above the established thresholds of 60 dBA at any existing single family residential use, 65 dBA for any multifamily use or 70 dBA at a commercial use then additional mitigation in the form of higher barriers, sound absorbing materials or operational limits on the crushers usage will need to be incorporated to meet the required thresholds.

MM-TR-1 All trees in the median of Mission Road affected by the design of the turning lane and the line of sight distance shall be addressed by the applicant/developer. Prior to removal, the applicant/developer shall deposit sufficient funds allowing the City to hire a Certified Arborist to assess the value of trees and replacement ratio. Pending the Arborist's report, the City shall determine the feasibility of relocating the affected trees or an appropriate replacement ratio and size for the replacement of the trees at the cost of the applicant/developer. The applicant/developer shall be responsible for tree removal prior to any construction related to the median improvements. Finally, the project applicant/developer shall replace all affected landscaping in the median. Proposed replacement landscaping selections for the median shall be reviewed and approved by the Department of Public Works. The replacement landscaping shall be maintained to a height not to exceed 36 inches.

A MITIGATED NEGATIVE DECLARATION will be prepared.

If adopted, the Mitigated Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the Planning Division Counter at the City of San Marcos, 1 Civic Center Drive, San Marcos, CA 92069.

NOTICE

The public is invited to comment on the proposed Mitigated Negative Declaration during the review period.

Date of Determination: September 10, 2014

Garth Koller, Project Planner

Appendices A through N are included on CD.

Please see back pocket of document.